Mobile Cleaners Pilot Program: Final Report
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Section 1 - Background

Mobile Cleaners (surface cleaners, janitorial services, auto detailers, carpet cleaners, window washers) have been identified as a significant source of pollutants that are discharged through storm drain systems in the San Francisco Bay Area. The environmental impact, regulatory liability, and ubiquitous nature of discharges from mobile cleaning businesses make them a seemingly ideal candidate for regulation. Yet, local agencies have found it difficult to regulate these discharges due to the businesses being mobile, the discharges being transient, and in the case of surface cleaners and janitorial services, completion of much of the cleaning work at night.

Consequently, the Bay Area Stormwater Management Agencies Association (BASMAA) initiated a pilot project designed to encourage and promote voluntary compliance with regionally accepted Best Management Practices (BMPs). The Mobile Cleaners Pilot Project was conceived by BASMAA as an incentive-based regional source control program. A target group of mobile cleaners would be selected for a focused pilot study and then, based on the results of the study, the program could be expanded to other types of mobile cleaners. Based on the objectives outlined by BASMAA, a team of consultants headed by Larry Walker Associates was selected to develop the pilot program. Palo Alto's Clean Bay Business Program, significantly modified to reflect the unique characteristics of the mobile cleaning industry, was used as a model. Some of the special considerations for this audience included devising strategies to encourage compliance from transient companies, directing educational efforts towards potential customers as well as mobile cleaners themselves, and applying the approach regionwide. The proposed program, endorsed by the San Francisco Bay Regional Water Quality Control Board (RWQCB), included the following components:

- convening advisory groups of mobile cleaners and their customers to provide feedback on program strategies and materials,
- drafting BMPs for proper wash water disposal,
- producing outreach materials for cleaners and customers,
- holding outreach/recognition workshops for cleaners,
- awarding training certificates to cleaners who attended the workshops, and
- creating a database of recognized cleaners.

Project Team

The team of consultants selected by BASMAA to develop the pilot program consisted of Larry Walker Associates, Harris and Company, and Janet Cox. Larry Walker Associates provided project management and the technical background for developing BMPs, Harris and Company helped organize and conduct the workshops, and Janet Cox supplied expertise in public participation strategies and preparation of outreach materials.
Numerous surface cleaners and the Cleaning Equipment Trade Association (CETA), namely Dave Wyett, provided useful input to the project team which resulted in a successful project approach. Geoff Brosseau, the Executive Director of BASMAA, provided project coordination and valuable assistance in developing strategies and program materials.

Report Organization

The final report on the Mobile Cleaners Pilot Program is organized into sections that detail the evolution of the project as it occurred. A summary of each report section is listed below along with the page numbers and section subheadings:

- **Section 1 - Background** [page 1]
  (an overview of the project objectives, purpose, and approach)

- **Section 2 - Program Development** [page 3]
  (a description of the process used to develop the program approach)
  
  Selection of the Target Group
  Advisory Group Meetings
  Key Ingredients Identified for a Successful Surface Cleaners Outreach Program

- **Section 3 - Program Elements** [page 9]
  (a description of each element developed for the program and how they were used to execute the overall approach)
  
  BMPs
  Outreach Materials
  Workshops
  Recognition

- **Section 4 - Workshop Results** [page 12]
  (a summary and assessment of the first surface cleaners workshop)
  
  Pre-workshop Efforts
  Workshop Summary
  Workshop Assessment

- **Section 5 - Follow-up Activities** [page 17]
  (activities necessary for continued implementation of the surface cleaners program and for expanding the program to other types of cleaners)
  
  Additional Outreach Efforts for Surface Cleaners
  Coordination Efforts with POTWs
  Transfer of Program Administration to Local Stormwater Agencies
  Application of the Pilot Program to Other Types of Mobile Cleaners

- **Section 6 - Program Assessment** [page 23]
  (identification of factors contributing to the success of the pilot program and suggested improvements)
Section 2 - Program Development

Development of the pilot program involved selecting a target group for the initial outreach efforts. Once selected, an advisory group consisting of members of the target audience was established to provide input on what would constitute a successful program. This section includes information on target group selection and the results of various advisory group meetings.

Selection of the Target Group (Surface Cleaners)

A target group of mobile cleaners was selected in order to focus initial efforts and to assess outreach techniques and institutional structures. Selection of an appropriate target group was an important first step, because the results of the pilot program will be used to establish a framework for a larger program that is potentially applicable to the entire mobile cleaner industry. To select the appropriate target group, the following criteria were considered:

- Wash water discharged to the streets or storm drains by the target group should pose a substantial threat to water quality based on both composition and quantity.
- The number of businesses in the target group should be large enough to allow meaningful assessment of the pilot project's effectiveness but small enough to make intensive outreach feasible. An optimum size would be 50-150 businesses. (Participation of less than 50 businesses would limit the abilities of the pilot program to ascertain outreach techniques. Greater than 150 businesses may lead to logistical problems in administering a pilot project.)
- The target group should have a definable and identifiable customer base.
- The target group should represent a range of business sizes and language/cultural diversity.

An initial list of mobile cleaners by category was developed under a contract issued by the Bay Area Pollution Prevention Group (BAPPG). (For details on how this database was compiled, refer to discussion in Section 4.) The list was used to compile Table 2-1, a summary of the types of mobile cleaners in the Bay Area and the nature of their discharges. Information regarding discharge volume and pollutant content was based on field experience acquired by members of the BASMAAA Mobile Cleaners Work Group and CETA.

A review of Table 2-1 reveals that categories meeting the size criteria include surface cleaners, water proofers, and window cleaners. Of those three categories, surface cleaners are most likely to generate wastewater that is of concern with respect to composition. In addition, surface cleaners generate wastewater in larger volumes than the other categories, represent a wide range of business sizes (1 to 12 employees), and conduct a variety of activities (e.g., sidewalk and plaza cleaning, parking lot and garage cleaning, cleaning of building exteriors, painting preparation, and graffiti removal). Surface cleaner customers are likely to be local government agencies, property management companies, parking lot operators, and shopping malls. These customers should be easier to identify and contact than customers related to water proofers and window cleaners. Based on the above discussion, surface cleaners appeared to best meet the selection criteria and were selected as the target group for the mobile cleaners pilot program.
**Table 2-1. Characteristics of Bay Area Mobile Cleaners**

<table>
<thead>
<tr>
<th>Category</th>
<th>Estimated Number</th>
<th>Nature of Discharges</th>
<th>Customers</th>
</tr>
</thead>
<tbody>
<tr>
<td>Auto detailers</td>
<td>297</td>
<td>Low volume; grease, oil and metals in discharge</td>
<td>Individual car owners</td>
</tr>
<tr>
<td>Carpet cleaners</td>
<td>1235</td>
<td>Moderate volume, high level of pollutants</td>
<td>Private homes, offices.</td>
</tr>
<tr>
<td>Janitorial services</td>
<td>959</td>
<td>Mostly indoor activities, discharge to sanitary sewer</td>
<td>Office buildings, restaurants, apartment buildings</td>
</tr>
<tr>
<td>Surface Cleaners (steam cleaners/</td>
<td>125</td>
<td>High volume; grease, oil and metals in discharge</td>
<td>Restaurants, parking lot operators, supermarkets, office buildings, apartment buildings, municipalities</td>
</tr>
<tr>
<td>pressure washers)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Truck washers</td>
<td>10</td>
<td>Moderate volume; grease, oil and metals in discharge</td>
<td>Businesses with fleets</td>
</tr>
<tr>
<td>Water proofers</td>
<td>125</td>
<td>Moderate volume, low levels of pollutants</td>
<td>Private home owners, businesses with decks and fences</td>
</tr>
<tr>
<td>Window cleaners</td>
<td>125</td>
<td>Moderate volume, low levels of pollutants</td>
<td>Office buildings, apartment buildings</td>
</tr>
</tbody>
</table>

**Advisory Group Meetings**

Three advisory group meetings, attended by surface cleaners, surface cleaner customers, equipment distributors, and regulators were held to advise the project team on program development. A summary of information obtained from these meetings is presented in the following subsections.

*January 30, 1996*

Attendees at the January 30th meeting consisted of large and small mobile cleaners, equipment distributors, customers, Geoff Brosseau (representing BASMAA), and members of the project team. General information about surface cleaning businesses in the Bay Area was solicited from the attendees and a summary of the information obtained is presented in Table 2-2.
Table 2-2. Characteristics of Bay Area Surface Cleaners

<table>
<thead>
<tr>
<th>Surface cleaners operating in the Bay Area typically......</th>
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<tr>
<td>have 1 to 2 employees and own 1 or 2 cleaning units (this probably describes 95% of the surface cleaning companies).</td>
</tr>
<tr>
<td>do not have any special licenses, although some may have contractor’s licenses and some have business licenses for the city where their office is located.</td>
</tr>
<tr>
<td>learn about their trade through equipment vendors and distributors.</td>
</tr>
<tr>
<td>travel all over the Bay Area to conduct their work, and may go as far north as Eureka and as far east as the Central Valley.</td>
</tr>
<tr>
<td>work in the early morning hours to minimize interruption of customer's business operations.</td>
</tr>
<tr>
<td>are busier during the summer.</td>
</tr>
<tr>
<td>can speak some English, although many employees speak Spanish while the owners speak English. (There are also quite a few Chinese speaking cleaners that contract to Chinese restaurants in San Francisco.)</td>
</tr>
<tr>
<td>obtain new business through advertising in the yellow pages, circulating flyers to potential customers, and word of mouth.</td>
</tr>
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</table>

Discussion with the advisory group members also revealed what surface cleaners would like to see in the pilot program:

- An educational approach with incentives for compliance was preferred over the usual regulatory approach.
- An acceptable education program involved drafting BMPs consistent to all communities of the Bay Area and then making this information available to surface cleaners through brochures and workshops.
- An endorsement from the RWQCB or other official government agency was considered a good incentive for compliance, as it would distinguish environmentally responsible companies from the others.
- Effective outreach to current and potential customers was considered critical to success.

Team members suggested a workshop as a way to educate surface cleaners on the required BMPs and to confer the official endorsement/recognition. The cleaners were interested in this approach and thought that a verbal presentation and slide show would be a good way to explain the regulations and acceptable pollution prevention practices. They also suggested that the workshops be conducted in English, held on a midweek morning, and at a location with minimal traffic and free parking. Sufficient advanced notice was recommended to encourage attendance along with advertising through equipment distributors.

To reward efforts taken for pollution prevention, the advisory group members desired an endorsement letter or training certificate which would be issued to each cleaner by the RWQCB and BASMAA. It was indicated that some sort of official document could be used effectively as a marketing tool. However, to make the recognition process work, the following recommendations were made: 1) new cleaners should be educated and accepted into the program quickly (holding workshops only once or twice a year may limit competition), 2) a list of cleaners receiving the
endorsement must be prepared and regularly updated, and 3) potential customers must be made aware of cleaners on the list.

A major requirement among the cleaners in attendance was an assurance that if an investment is made to comply with BMPs, that competitors will also comply or be punished for not complying. They perceived an unfair advantage to companies not disposing of wash water properly, given lower operating costs and possibly lower bids for projects. Having customers request endorsed companies would help level the playing field; but to achieve this goal, the customers need educating as well as the surface cleaners. Customers can be effectively reached through existing stormwater, pretreatment, or hazardous materials programs. Advisory group members suggested municipalities send letters to potential customers notifying them of the BMPs set forth for surface cleaning and listing the businesses that have been trained to comply with those requirements. The critical point to be stressed in the customer outreach effort was that surface cleaning can be done in an environmentally responsible manner. The surface cleaners worry that customers may stop contracting for cleaning work altogether in order to avoid a potential controversy or enforcement action.

A related problem that was discussed during the advisory group meeting is the lack of a consistent regulatory approach from municipality to municipality. Regulators must be educated about the recommended BMPs and the importance of regional consistency as each city inspects for and ultimately approves/disapproves of disposal practices. This also includes having a consistent policy from the POTWs for accepting wash water through the sanitary sewer system.

March 13, 1996

The March 13th meeting was held to discuss common cleaning/disposal issues and to assess the practicality and appropriateness of the proposed BMPs. Smaller surface cleaning companies were recruited for this meeting to ensure that their point of view would be taken into account in the final set of BMPs. Five surface cleaning companies were represented at the meeting. The discussion of common cleaning/disposal issues covered problems with landscape and sewer disposal, hazardous waste identification and disposal, responsibilities of property owners, and the need for consistent guidance from regulators. Their points of concern are listed below:

- Disposal of wash water to landscaping is a preferred option, but it is only feasible for jobs in residential areas or large industrial parks.
- Collecting wash water and disposing of it to the sewer system was perceived to be time consuming and expensive.
- There is a need for inexpensive, practical methods of collecting wash water.
- Cleaners would like guidance on solid and hazardous waste disposal: how do you determine if waste material is hazardous? If a waste is determined to be a hazardous, where are the appropriate locations for disposal? Who is responsible for disposal, the cleaner or the property owner?
- What are the responsibilities of owner/managers with regard to pollutants entering storm drains from their property?
• Property owners should be informed that they are liable for discharges as well as the cleaner.
• From the cleaners point of view, it would be ideal if the property owners called the POTWs to request approval for discharges or at least told the cleaners how the wash water should be disposed.
• Getting the property owners involved will ensure that irresponsible cleaners are not unfairly competing with responsible cleaners.
• The final concern was consistent acceptance of BMPs by regulatory officials. How will it be ensured that municipal regulators, as well as the RWQCB, are looking for the same types of problem discharges or accepting the same types of storm drain discharges?

The cleaners also provided comments on the proposed BMPs and suggested improvements. These suggestions included the following:

• Dry cleanup before applying water should be emphasized.
• Cleaning without soap should be tried first. It is easier to avoid using soap because less water is required for rinsing afterwards. In fact, soap is not necessary in many situations as hot water under pressure will remove most everything.
• Information should be provided on how to determine if a waste is hazardous.
• When discussing disposal options for cleaning painted buildings, a clear distinction should be made between the very different objectives of removing paint and just cleaning the painted exterior.
• When disposing wash water to landscaped areas or open ground, the soil should be soaked first to ensure good infiltration.

July 30, 1996 Meeting

A group of surface cleaners and cleaning equipment distributors were assembled on July 30 to preview information to be presented at the outreach/recognition workshops and to assess an exam that would be used as the basis for awarding official recognition. (The RWQCB and BASMAA wanted some form of assessment to be given before awarding training certificates.) All of the attendees had attended one or both of the previous advisory group meetings and thus had some knowledge of the pilot program. All the advisory group members easily "passed" the exam which prompted a long discussion on the value of the exam. In an attempt to make the exam appropriate and passable for the majority of cleaners, it was agreed that the usefulness of it as an assessment technique had become diminished. As a result, it was decided that the exam would be given as a "self quiz," to be used solely by the cleaners to determine their own level of awareness and comprehension. Official recognition would not be based on passing an exam, only on attendance at a workshop and then completing the "self quiz." A detailed answer sheet would be provided after the quiz.
Key Ingredients Identified for a Successful Surface Cleaners Outreach Program

The following summary discussion highlights findings from the advisory group meetings in terms of what the target audience believed would constitute a successful surface cleaners program. These findings were used to formulate the program elements described in detail in Section 3.

- An educational approach with incentives for compliance, such as increased business, was preferred over strict regulatory enforcement.
- An endorsement (letter or certificate) from the RWQCB or other government agency would be a good marketing tool to help draw attention to those cleaners who make an effort to comply with the regulations.
- To make the endorsement worthwhile, there must be a method of accurately keeping track of cleaners receiving the recognition and a program to get new cleaners educated and onto the list in a timely manner.
- There is likely an economic advantage given to companies that do not comply with BMPs because of lower operating costs and lower bids for projects. To make sure that an investment to comply with BMPs is worthwhile, there must be some pressure on competitors. Having customers request the endorsed companies would level the playing field.
- To ensure that customers know the value of hiring responsible cleaners, outreach and education is needed for potential customers as well as the surface cleaners.
- Some education of customers can be done through existing pretreatment, hazardous waste, and stormwater programs; issuance of City business licenses; and chambers of commerce mailings. Information about wash water disposal requirements could be provided to potential customers by these entities along with a list of businesses that have been trained to comply with the requirements.
- The best incentive for municipal or County stormwater agencies to implement customer outreach would be instruction from the RWQCB supported by stated Board Policy.
- There is a current lack of consistency between regulators on wash water disposal practices. Municipal regulators must be educated on the recommended BMPs to ensure that each city inspects for and then approves/disapproves of the same practices. This also includes a consistent POTW policy for accepting wash water through the sanitary sewer system.
- A workshop was perceived as a way to educate surface cleaners on the required BMPs and to receive the official endorsement/recognition.
- Any technical guidance provided for pollution prevention should emphasize methods that are inexpensive and practical. The guidance should also provide information on solid and hazardous waste disposal.
Section 3 - Program Elements

In preparing the overall approach and the individual components of the pilot program, the key ingredients identified during the advisory group meetings were integrated with the original objectives laid out by BASMAA. The proposed program was then submitted to BASMAA and the RWQCB for review and approval. The result of these efforts is an education/recognition-based approach to achieving compliance with BMPs. Initially, the outreach to surface cleaners will be entirely educational, although cleaners that attend the workshops are informed that non-stormwater discharges to the storm drain system are illegal, and that enforcement of general stormwater protection regulations may be stepped up as a result of this program. The pilot program for surface cleaners is described in the following paragraphs in terms of the program elements that were developed to implement the overall approach.

BMPs

BMPs were developed for surface cleaners based on a working document prepared by CETA in 1994. (To reduce the amount of jargon presented to the surface cleaners, the term "pollution prevention practices" was used instead of BMPs in all of the outreach materials prepared for this project.) The CETA BMPs were modified according to input from BASMAA and the advisory group members and then reformatted for presentation in a brochure. The BMPs are organized according to the type of surface being cleaned such as sidewalks, parking lots, and painted building exteriors. Appropriate disposal options including landscape disposal, storm drain disposal, and sanitary sewer disposal are listed for each of the surfaces based on known wash water constituents and amount of effort expended to remove pollutants from the wash water prior to discharge.

Outreach Materials

Outreach materials were produced based on the intended audience (surface cleaners, customers, local agencies) and expected use of the materials. The materials were designed to educate cleaners and customers, provide cleaners with a way to advertise their pollution prevention efforts, and facilitate recordkeeping of cleaning work done at a particular job site. Each outreach item developed for the pilot program is described in the following paragraphs:

"Pollution from Surface Cleaning" - This folder was prepared to educate surface cleaners about the effects of wash water discharges to the storm drain system and to prescribe effective, low-cost pollution prevention practices. Surface cleaners are expected to use the folder as a field reference when faced with wash water disposal questions. The folder is constructed of heavy paper and contains a pocket to hold related documents, such as agency phone numbers, advertising brochures, and pollution prevention vouchers.
"We’ll do the Job Right!" - This card was prepared for distribution by "Recognized Surface Cleaners" to potential customers in order to proclaim their qualifications and intent to prevent water pollution while conducting cleaning work. The card fits easily into an envelope for inclusion with bids on specific cleaning projects or use in general outreach to existing or potential customers.

"When You Contract for Surface Cleaning......" - This flyer was prepared for customers who regularly hire surface cleaners. It alerts the customers about the outreach/recognition program and specifies the pollution prevention practices that should be used to prevent improper discharges to the storm drain system. The flyer is suitable for photocopying and will be made available for mass mailings by POTWs and municipal stormwater agencies.

Pollution Prevention Voucher - The voucher was designed as a record of pollution prevention practices undertaken at a particular job site. It is to be filled out in duplicate by a Recognized Surface Cleaner upon completion of a cleaning project. Retention of a copy by both the cleaner and the customer provides a record for inspectors and the cleaners themselves of the type of surface cleaned, the cleaning method used, and how the wash water was disposed.

Workshops

An Outreach/Recognition Workshop was developed to provide surface cleaners with the technical information required to protect the environment, comply with the law, and become a Recognized Surface Cleaner. The first workshop was held August 13, 1996 in Hayward at the Alameda County Public Works Office. At the workshop, an overview of the pilot program was presented along with the stormwater regulations and the appropriate methods for disposing of wash water. After the formal presentations, a question and answer session was held and the self quiz was distributed. Ninety surface cleaners received a training certificate and became Recognized Surface Cleaners. A detailed summary and an assessment of the August 13th workshop are presented in Section 4. Similar workshops were held November 12 and 13, 1996 in the Concord and Palo Alto areas, respectively.

After the initial series of organized workshops, there will still be surface cleaners who either could not attend a workshop or who are new to the business and desire recognition. To address this situation, the August 13th workshop was videotaped and edited for instructional presentation. The video, along with the outreach materials, the self quiz, training certificates, and instructions on how to conduct the workshop and administer the test will be part of a recognition/training kit distributed to municipalities and/or POTWs. Possession of the recognition kit will allow agencies the opportunity to offer Outreach/Recognition Workshops in their offices on an as-needed basis.

Recognition

Surface cleaners may become "recognized" as environmentally responsible surface cleaners by attending a workshop and completing the self quiz. The self quiz is a true/false, multiple choice exam on appropriate pollution prevention practices and the effects of improper wash water disposal methods. Completion of the exam requires 15 to 20 minutes plus additional time for the test taker to review the answer sheet and compute his/her score. After completion of the quiz, a numbered
"training certificate" is issued to the cleaner from BASMAA and the RWQCB. The certificate can be displayed to customers as an indication that the cleaner will comply with regulations and complete the job in an environmentally responsible manner. Recognition is conferred on individuals, not companies, so each company is encouraged to have as many recognized employees as possible to ensure that at least one recognized cleaner is working at a particular job site.

Issuance of the training certificates will also be used by BASMAA to keep track of who has attended workshops and which cleaners may be recommended to municipalities and potential customers. To accomplish that goal, BASMAA maintains a Recognized Cleaners Database. The database includes the company name/address/phone, names of recognized cleaners employed by the company, certificate numbers assigned to those employees, date of training, type of cleaning that is conducted by the company, and the area of service. Municipalities can request a copy of the database to promote recognized cleaners in their area, while potential customers can request a copy of the database when soliciting bids for cleaning projects.
Section 4 - Workshop Results

This section includes detailed information about planning and presenting the first Outreach/Recognition Workshop for surface cleaners, held on August 13, 1996. The work effort included notifying potential participants and other interested parties about the workshop, conducting the workshop, and assessing the value and execution of the workshop.

Pre-workshop Efforts

Surface cleaners, surface cleaner customers, and cleaning equipment distributors were notified about the workshop through a mass mailing completed six weeks prior to the workshop. The municipal stormwater programs, municipal customers, and POTWs were sent materials about the pilot program about three weeks later by the RWQCB. A summary of the recipients and materials included in the mailings is presented in the Table 4-1. The mailing list used for the surface cleaners and equipment distributors was developed under a contract issued to Michelle Friedland by the Bay Area Pollution Prevention Group (BAPPG). Friedland compiled the names through phone books, referrals from cleaners and distributors, membership lists from CETA and other trade associations, and a national database of businesses organized by SIC code. She then verified each name recorded in the database by telephone. Surface cleaner customers were located by the current project team through a review of Bay Area phone books. The targeted types of customers included parking lot owners, shopping centers, real estate management companies, and Chambers of Commerce.

The package sent to cleaners, equipment distributors, and customers included a letter from the RWQCB, a program fact sheet, and a workshop flyer. In the letter, the RWQCB identified discharges from mobile cleaners as a significant source of pollutants to the storm drain system and strongly recommended participation in the surface cleaners program by attending a workshop and becoming a Recognized Surface Cleaner. Equipment distributors and customers were asked to forward the workshop information on to cleaners that they sell equipment to or hire to clean their facilities. The fact sheet described the approach of the pilot program, the outreach materials and events scheduled, and how the materials/events will be used to implement the program. A flyer was also included that listed the date, time, and location of the workshop. This package of informational materials was sent to approximately 500 recipients.

During the week prior to the workshop, phone calls were made to each of the 160 surface cleaners on the mailing list. This contact was made to reinforce the purpose of the workshop and emphasize the benefits of becoming a Recognized Surface Cleaner. Very few cleaners were actually reached in person, but messages were left on all of the available phone message machines. Additional promotion of the workshop came from distribution of workshop flyers at a CETA conference.
Table 4-1. Mailings Completed for the August 13, 1996 Outreach/Recognition Workshop

<table>
<thead>
<tr>
<th>Recipients (Approx. Number)</th>
<th>Mailing Completed By (and contents):</th>
<th>RWQCB</th>
<th>BASMAA</th>
</tr>
</thead>
</table>
| Municipal Stormwater Programs | • RWQCB letter  
• Program fact sheet  
• Surface cleaner brochure  
• Surface cleaner and customer database |       |        |
| Municipal Customers | • RWQCB letter  
• Program fact sheet |       |        |
| POTWs | • RWQCB letter  
• Program fact sheet  
• Surface cleaner brochure |       |        |
| Surface Cleaners (160) | • RWQCB letter  
• Program fact sheet  
• Workshop flyer |       |        |
| Commercial Customers (260) | • RWQCB letter  
• Program fact sheet  
• Workshop flyer |       |        |
| Cleaning Equipment Distributors (75) | • RWQCB letter  
• Program fact sheet  
• Workshop flyer |       |        |

Workshop Summary

The first Outreach/Recognition Workshop was held at the Alameda County Public Works Office in Hayward on Tuesday, August 13, 1996. A total of 106 people attended the workshop. The number and types of attendees are summarized in Table 4-2.

Registration began at 9:30 am, although many participants arrived as early as 8:30 am. The early arrivals occupied their time by perusing tabletop displays set up by four equipment vendors and viewing equipment that would be used in the technical presentation. After a reorganization of the seating layout to accommodate extra participants, the workshop started a little after 10:00 am with an introduction by Chris Harris of Harris and Company. Geoff Brosseau of BASMAA then spoke for 25 minutes on the background for a mobile cleaners program, the various players and their responsibilities, and the overall strategy for the surface cleaners program (brochures, vouchers, database, additional workshops, etc.). Dale Bowyer of the RWQCB spoke for 10 minutes addressing the water quality regulations, the reasons behind the regulations, and the approach that regulators will be taking when handling wash water discharges. Mack Walker of Larry Walker Associates then spent approximately 30 minutes providing technical information regarding the implementation of pollution prevention practices.
Table 4-2. Attendees of the August 13, 1996 Outreach/Recognition Workshop

<table>
<thead>
<tr>
<th>Business Category</th>
<th>Number of Attendees</th>
<th>Representing.....</th>
</tr>
</thead>
<tbody>
<tr>
<td>Surface Cleaners</td>
<td>83</td>
<td>companies that wash sidewalks, plazas, buildings, mobile homes, shopping carts, parking lots, restaurant kitchens, and vehicles as well as companies that restore wood surfaces.</td>
</tr>
<tr>
<td>Equipment Distributors</td>
<td>16</td>
<td>companies that sell and rent pressure washing equipment, sell cleaning materials, and distribute water treatment supplies.</td>
</tr>
<tr>
<td>Municipalities (regulators and maintenance personnel)</td>
<td>6</td>
<td>City of San Jose, City of Sacramento, Contra Costa Clean Water Program, City of Sunnyvale, and the City of Concord.</td>
</tr>
<tr>
<td>Consultants</td>
<td>1</td>
<td>EOA, Inc.</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>106</strong></td>
<td></td>
</tr>
</tbody>
</table>

After the formal presentation, a question and answer session was facilitated by Geoff Brosseau. The attendees had many questions, resulting in the question and answer session spilling over into the time allotted for the self quiz. The questions primarily focused on why the surface cleaning industry is being targeted when there are many larger sources of pollutants, procedures for dealing with POTWs, inconsistent enforcement from different agencies, and how to conduct specific cleaning applications. Additional questions were asked and answered during administration of the quiz. After the quiz was completed by the workshop attendees, an answer sheet was passed out which included the correct answers to the questions and explanations for why the correct answer should have been selected. At this point in the workshop, the participants were encouraged to ask questions about the quiz or pick up their training certificates.

Blank training certificates were prepared prior to the workshop with spaces available to enter the date of the workshop, the certificate number, and the name of the recognized surface cleaner. The 1996/97 period of certificate validity was established and printed on the certificates, in case major program/policy changes occurred in the future and it becomes necessary to retrain the recognized cleaners. Red paper was chosen for the certificates after determining that red is the most difficult color to photocopy. It is hoped that production of a poor photocopy will deter "counterfeiting" of certificates. During the workshop, certificate numbers and the names of the recognized cleaners were recorded on the certificates according to entries on the registration list. At the end of the workshop, 90 certificates were issued to almost all of the surface cleaners in attendance and a few of the equipment distributors and regulators.
Workshop Assessment

The value and execution of the August 13th workshop was assessed through comments from participants and analysis by the project team. Participant’s comments were obtained by conversations with workshop organizers and from evaluations completed a month after the workshop was completed. The project team’s assessment involved analyzing efforts that contributed to the success of the workshop and improvements that could be made to increase effectiveness of future workshops.

Participant’s Comments

The vast majority of participants were pleased with the workshop and the incentive/educational approach taken in the pilot project. Approval was noted through comments and by the evident desire of the cleaners to obtain a training certificate, customer brochures, and pollution prevention vouchers. Many participants asked when the next workshop will be held and how they will be notified of the scheduled date. (It was unclear whether the participants wanted to send other employees or if they wanted to attend another workshop thinking that additional information would be presented. The plan to conduct additional workshops in the next few months was announced in the presentation but the contents of the workshops were not specified.)

Workshop organizers and presenters were thanked many times for their efforts and were told that clarification of the regulations and requirements was really needed. The primary concern of cleaners already implementing pollution prevention practices was to level the playing field so that all competitors are bidding for jobs under the same conditions. Some of the attendees suggested improvements for future workshops and for the mobile cleaners program.

One month after the workshop, an evaluation form was sent to all participants (see Section 5 for details on the post-workshop mailing). Opinions were solicited on the content of the presentations and recommendations were requested for effective, inexpensive pollution prevention practices. Comments received at the workshop and through returned evaluation forms are summarized below:

- All of the participants that filled out an evaluation form indicated that the workshop provided them with a good understanding of the environmental issues and pollution prevention requirements.
- Many participants felt that more information was needed on specific pollution prevention techniques and specific applications.
- Some of the pollution prevention practices suggested during the presentation were perceived as impractical or expensive. The cleaners felt they could recommend some better practices.
- Many cleaners identified a need for better access points for disposal of wash water to the sanitary sewer system.
- Concerns were expressed about the inconsistent enforcement of regulations. Different policies between cities is frustrating. Honest competition is restricted when some cleaners get away with improper disposal methods while others are being prosecuted.
• More participation by vendors at the workshop was desired. The cleaners wanted to see actual demonstrations of pollution prevention equipment and/or receive a list of equipment suppliers.
• It would be useful to have a method of sharing information on regulations and pollution prevention practices within the industry. A newsletter, a page on the Worldwide Web, and articles in trade journals were suggested.

Analysis by the Project Team

Based on attendance, participant's enthusiasm, and amount of information transmitted during the workshop, the workshop was considered a success by BASMAA and the project team. Some of the factors contributing to the success of the workshop are listed below:

• Inclusion of a letter from the RWQCB with the workshop flyer demonstrated the State's concern and identified the ramifications of not participating in the program.
• Phone calls made to the surface cleaners a few days prior to the workshop reminded them of the upcoming event and highlighted the importance of participation.
• The trade association (CETA) was an effective network for reaching cleaners and increasing participation at the workshop.
• Practical information was presented at the workshop in a comfortable forum and in a reasonable time period (2 hours).

Although the first workshop was considered a success, possible improvements for future workshops were noted by the project team especially with regards to administration.

• More vendors, displaying a variety of products, should be present at the workshops.
• Workshops could be scheduled for an earlier hour, since many of the participants arrived prior to 9:30 am.
• Additional time and assistance is required at the registration table in order to clearly record the participant's name and company information. Clearly recording the participant's name will prevent problems with completing training certificates and updating the database.
• Certificates should be numbered and dated before the workshops to save time and prevent undue stress when it comes time to enter the individual names.
• The question and answer session may need to be longer to prevent distractions during the exam period.
• Questions asked by participants should be repeated by the moderator to ensure they are heard by all audience members.
• There was some overlap of subject matter between presenters, namely the environmental problems associated with improper disposal and recognition to CETA BMPs.
Section 5 - Follow-up Activities

Follow-up activities for the Mobile Cleaners Pilot Program include additional outreach for surface cleaners through workshops, newsletters, and further customer contacts; coordination efforts with POTWs regarding sanitary sewer disposal policies; transfer of program administration to local stormwater programs; and development of outreach programs for other types of mobile cleaners.

Additional Outreach Efforts for Surface Cleaners

Additional Outreach/Recognition Workshops were held for surface cleaners, one in Concord on November 12, 1996 and one in Palo Alto on November 13, 1996. The Concord workshop was sponsored by the Contra Costa Clean Water Program, the Fairfield-Suisun Urban Runoff Management Program, and the Vallejo Sanitation and Flood Control District. The Palo Alto workshop was sponsored by the Santa Clara Valley Nonpoint Source Pollution Control Program and the San Mateo Countywide Stormwater Pollution Prevention Program. Attendance was excellent at both workshops and the level of enthusiasm amongst participants was still very high. The number of attendees and the type of businesses that they represented are summarized in Table 5-1. Employees from private surface cleaning companies were the largest category in attendance once again, but there were more public works employees at this set of workshops than seen previously.

The Recognized Cleaners Database was prepared immediately after the August 13th Surface Cleaners Workshop and at that time consisted of 90 recognized cleaners. This initial list was made available to anyone requesting information on trained surface cleaners in their area. The list was also included with a pollution prevention mailing completed by the City of Palo Alto and was distributed (along with the master customer flyer) to all Bay Area POTWs and municipalities through BASMAA and the RWQCB. Additions to the database after the November 12th and 13th workshops have increased the number of recognized cleaners to 236. The database entries (based on participation in the first three workshops) are summarized in Table 5-2 and organized by each cleaner's identified business category.

Each of the workshop participants received a thank you letter from BASMAA. The participants were thanked for participating in the program and their desire to prevent pollution of our waterways. The letter sent out after the first workshop included information regarding the November 12 and 13th workshops and, to encourage attendance, explained that each employee needs to be recognized, not just one employee from each company. Letters sent out after the second and third workshops informed participants about plans to periodically update surface cleaners on the recognition program as well as preparation of the recognition/training kit which would allow workshops to be given at local stormwater agency offices. A self-addressed evaluation form was included with all of the letters to solicit an assessment of the workshop and suggestions for better, more practical methods of achieving pollution prevention.
<table>
<thead>
<tr>
<th>Business Category</th>
<th>Number of Attendees</th>
<th>Representing.....</th>
</tr>
</thead>
<tbody>
<tr>
<td>Surface Cleaners</td>
<td>101</td>
<td>janitorial services, garbage collectors, auto detailers, carpet cleaners, and surface cleaning companies that wash sidewalks, plazas, buildings, windows, and restaurant kitchens.</td>
</tr>
<tr>
<td>Customers</td>
<td>5</td>
<td>property managers and shopping centers.</td>
</tr>
<tr>
<td>Equipment Distributors</td>
<td>12</td>
<td>companies that sell and rent pressure washing equipment, sell cleaning materials, and distribute pollution prevention equipment.</td>
</tr>
<tr>
<td>Municipal Public Works Employees</td>
<td>35</td>
<td>departments that maintain landscaping, clean streets and sidewalks, remove graffiti, and clean storm drains and wastewater collection systems (from West Valley Sanitation District, Walnut Creek, Campbell, Daly City, Mountain View, Saratoga, Palo Alto, and Los Gatos.)</td>
</tr>
<tr>
<td>Municipal Regulators</td>
<td>18</td>
<td>Concord, San Carlos, Atherton, Contra Costa Clean Water Program, Delta Diablo Sanitation District, Daly City, West Valley Cities Stormwater Program, Stanford University, Vallejo Sanitation and Flood Control District, Santa Clara Valley Nonpoint Source Control Program, and Mountain View.</td>
</tr>
<tr>
<td>Consultants</td>
<td>1</td>
<td>Zumwalt Engineering (consultant to City of Mountain View)</td>
</tr>
<tr>
<td>Total</td>
<td>172</td>
<td></td>
</tr>
</tbody>
</table>

Preparation of the recognition/training kit is underway. The kit will include two video versions of the workshop, one for managers/owners of surface cleaning companies and another for surface cleaners. The version for managers/owners will include background information on the program and the regulations. The version for surface cleaners will only include information on how to implement pollution prevention practices. Distribution of the kit to interested agencies will occur by the summer of 1997. At that time, a list of agencies possessing the kit will be sent to everyone on the surface cleaners mailing list.
Table 5-2. Cleaners Included in the Recognized Cleaners Database Based on Participation in the First Three Workshops

<table>
<thead>
<tr>
<th>Business Categories</th>
<th>Number of Cleaners</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cleaners (the majority are surface cleaners, but some identified themselves as auto detailers, carpet cleaners, and window washers)</td>
<td>166</td>
</tr>
<tr>
<td>Customers (property managers or shopping mall operators that either hire surface cleaners or have cleaners on staff)</td>
<td>7</td>
</tr>
<tr>
<td>Equipment Distributors</td>
<td>18</td>
</tr>
<tr>
<td>Municipal Public Works Employees</td>
<td>35</td>
</tr>
<tr>
<td>Municipal Regulators</td>
<td>9</td>
</tr>
<tr>
<td>Consultants</td>
<td>1</td>
</tr>
<tr>
<td>Total</td>
<td>236</td>
</tr>
</tbody>
</table>

Activities suggested for further development of the Surface Cleaners Program:

- The surface cleaners program should be monitored to determine if the program has effectively achieved the desired goals. For example, it should be determined if recognized cleaners are actually receiving more business because of their involvement in the program. This can be done by tracking the number of requests for the Recognized Cleaners Database, surveying customers, and surveying cleaners. To determine the effect of the pilot program on discharges to the storm drain system, inspectors reports can be assessed and pollution prevention vouchers examined and tabulated. To evaluate the continuing level of support in the surface cleaner community, participation can be monitored through the number of training certificates issued and the number of attendees at future workshops. It may also be useful to survey cleaners after a year or so to gauge their perceptions of the program.

- Additional customer outreach is needed to determine what will motivate them to hire only recognized surface cleaners. The first part of this process would involve research to determine who the customers are and if there are any trade associations or organizations that can be used for networking and conscripting advisory group volunteers. The second part of this process would be to develop a program for reaching these customers and encouraging their participation.

- The cleaners really voiced a strong desire to see demonstrations of pollution prevention equipment at the workshops. Due to concerns expressed by the vendors themselves, this demonstration never occurred. However, since the cleaners want to at least know who sells the products, a list of pollution prevention equipment suppliers should be prepared and distributed to the recognized surface cleaners.
• Many workshop participants expressed an interest in receiving periodic updates on environmental issues, regulatory changes, and the recognition program. To maintain an informed and interested surface cleaner community, preparation of a newsletter, web site, or periodic articles in trade journals should be considered.

Coordination Efforts with POTWs

To facilitate further implementation of the Surface Cleaners Program, and in particular, to ease the transfer of non-stormwater discharges from storm drain systems to sanitary sewer systems, several coordination efforts were initiated at the end of this pilot program.

Mobile Cleaner Wastewater Sampling

BASMAA and the BAPPG are working together to identify mobile cleaning discharges of significant concern to POTWs. The project involves identifying discharges of significant concern based on mobile cleaner discharge data or best professional judgment of problematic cleaning job types, setting up cleaning jobs, taking and analyzing samples, and interpreting the results. BASMAA has contributed funds to conduct the project and POTWs will contribute laboratory services. Information on discharges determined to be of significant concern will be used in the development of a model POTW policy and procedures project.

POTW Policies and Procedures

Given the Regional Board position on accepting mobile cleaning discharges and that information on problematic jobs is forthcoming, POTWs will be developing internal policies and procedures for dealing with these "new" discharges. To assist the POTWs in this process and address the concern of regional consistency, a model policy and procedures will be written by BAPPG and promoted throughout the Bay Area (much as model stormwater ordinances were developed and adopted by co-permittees throughout the country). The BAPPG project involves developing such a model policy and procedures, and then working with individual POTWs to facilitate its review (revision if necessary) and adoption.

Transfer of Program Administration to the Local Stormwater Agencies

After the design, development, and implementation of the pilot Surface Cleaners Program, the next step is for local stormwater agencies to take over some of the continuing implementation. BASMAA will continue to facilitate and coordinate the program from a regional level, but further and more detailed implementation must happen at the local level. To maintain the momentum of this program, it is important that all the agencies, as well as the cleaners and their customers, do their part to ensure its long-term success. To start the transfer of program administration to local agencies, BASMAA produced two mailings (described below) that contained information on the Surface Cleaners Program and suggestions on how the agencies could implement program elements. BASMAA will continue to work with local agencies on these ideas and others to ensure the program's long-term success.
A letter and program materials were sent to all municipal stormwater program representatives and wastewater treatment plant source control staff in the Bay Area. The items described below were included in the mailing packet:

- "When You Contract for Surface Cleaning....." (Master copy) - The master copy is suitable for photocopying and distribution to any surface cleaning customers within an agency (e.g., public works, purchasing) as well as to private customers using existing mailing lists (e.g., business license, pretreatment list). The flyer is designed to be folded in thirds, taped shut, stamped, and addressed.
- Database of Recognized Cleaners - BASMAA keeps and updates this database of Recognized Mobile Cleaners. Municipalities can use the database to promote recognized cleaners in their area, while potential customers (both public and private) can request a copy of the database to check if their current cleaner is recognized or to use when soliciting bids for cleaning jobs.
- "Pollution from Surface Cleaning" - This folder explains the environmental effects of wash water discharges to storm drains and the pollution prevention practices to reduce these discharges.
- Answers to Frequently Asked Questions - Provides information on the Mobile Cleaners Pilot Program in a question and answer format.

A letter was sent to all stormwater program representatives listing potential follow-up actions that local agencies could take to help implement the Surface Cleaners Program. These actions are listed below:

- Post and circulate workshop announcements
- Copy and send customer flyers using existing mailing lists such as the business license list, the pretreatment list, and the Chamber of Commerce list
- Publicize the program through normal outlets (e.g., newsletters, utility bill inserts)
- Require cleaners to have a Training Certificate in exchange for a business license
- Require cleaners to have a Training Certificate in exchange for municipal/agency contracts
- Establish a purchasing policy that only cleaners on the BASMAA database of recognized cleaners will be listed on RFQ/RFP mailing lists
- Train municipal/agency staff (e.g., source control/pretreatment/inspection/enforcement) on the Surface Cleaners Program
- Send in-house cleaning staff to an outreach/recognition workshop
- Hold workshops using the recognition/training kit available from BASMAA
- Increase enforcement of the Surface Cleaners Program through:
  - training of inspection/code enforcement staff and
  - integration into other commercial/industrial stormwater program elements
• Add questions to inspection forms such as:
  - Are outside surfaces (e.g., sidewalks, driveways) wet early in the morning?
  - Is outdoor cleaning of sidewalks, buildings, driveways, etc. conducted?
  - If so, who does the cleaning and is the cleaner recognized by BASMAA and the Regional Board as having attended the training?
  - Are there plans to clean outside surfaces for painting or graffiti removal?
  - If so, is the cleaner or painter recognized by BASMAA and the Regional Board as having attended the training?

A letter was sent to all stormwater program representatives asking them to help identify one person at each stormwater program who can act as the local contact on mobile cleaning activities. (BASMAA plans to make the compiled list of local contacts available to other agencies as well as mobile cleaners and their customers.) The contact's duties would include:

• Being familiar with the surface cleaning program and prescribed pollution prevention practices
• Becoming aware of surface cleaners working in the local jurisdiction and their customers
• Responding to complaints and enforcing against cleaners and their customers for use of improper cleaning practices
• Assisting mobile cleaners calling for help

Application of the Pilot Program to Other Types of Mobile Cleaners

Development of a similar outreach program for other types of mobile cleaners should be postponed for at least a year. This time will allow implementation of the additional recommended activities for surface cleaners and will allow a "settling in" period to assess the value and effectiveness of the pilot program. Once this final assessment is completed, the process used in the pilot program should be adapted according to the different nature of the next target group. From a preliminary review of other types of mobile cleaners, auto detailers/fleet washers may be the next ideal choice. In particular, the companies that steam clean engines and the insides of tanker trucks generate wash water of very poor quality due to the detergents used in cleaning and the compounds removed from the vehicles themselves. To identify appropriate disposal methods, prescribe appropriate BMPs, and coordinate efforts with POTWs, wash water suspected to be of significant concern from vehicle washing operations should be characterized to the extent practicable prior to development of the program.
Section 6 - Program Assessment

Through a positive program of education and incentives, the Mobile Cleaners Pilot Program has created an enthusiastic wave of support for pollution prevention within the surface cleaner community. A significant percentage of surface cleaners working in the Bay Area have received the training and are essentially participating in the program. There are certainly a variety of reasons for each cleaner's participation, and it remains to be seen whether the enthusiasm can be translated into actual implementation of the prescribed BMPs. However, a positive connection has been made and will be cultivated through some type of periodic communication (see Section 5). The connection between BASMAA and the cleaners and the threat of stepped-up enforcement if compliance is not achieved should keep many cleaners "in the fold."

Based on observations compiled during development and implementation of the pilot program, the following elements have been identified that positively influenced the outcome of the program. As such, these elements should be included in the development of similar programs for other types of mobile cleaners.

- Use of advisory groups from the surface cleaner community was indispensable to the development of a program that was well-received by the target audience.
- Use of a workshop to confer recognition and transmit BMP information contributed significantly to the development of positive perceptions about the program within the surface cleaner community. It was important to alleviate suspicions by meeting regulators and hearing first-hand about the educational approach of the program.
- Use of a positive incentive for compliance (recognition) versus the traditional regulatory approach helped to increase participation in the program.
- Keeping the message simple was popular with the participants. Simple, straightforward BMPs and clear, easy to recognize rewards for compliance.
- The target audience was a good size to work with in a pilot program. The audience was large enough to show a range of responses, but not too large to complicate project administration.
- Use of a regional organization (BASMAA) to coordinate and represent program efforts helped to increase participation and ensure consistent administration. Use of a regional organization as program coordinator demonstrates that governmental agencies can work together, reflects an efficiency of administration and costs, and provides the basis for consistent enforcement between areas.
- It was essential to include all members of the surface cleaners community (company managers, cleaners, customers, municipal agencies) when devising the program and putting together outreach materials.
- Inclusion of a trade association in program development was very effective. CETA provided background information on the surface cleaner community, networked to cleaners about the workshops, and reviewed the draft program materials.
To improve the pilot program and make the program more likely to succeed when applied to other types of mobile cleaners, the following improvements are suggested:

- POTWs should be significantly included from the beginning of the project. The POTWs need to have their role defined and to have clear information on the quality and quantity of discharges to the sanitary sewer system. The need for a coordinated effort between all affected parties should not be underestimated.

- Customers of the target group should be included more in project development. It is essential to determine exactly what the customers need to see in order to understand issues and hire recognized cleaners. An attempt was made to include customers in the surface cleaners program, but due to the diverse types of businesses they represent, it was difficult to track the customers down or to relate why this issue affects them. Use of a trade association, such as CETA, would have been useful to identify the customers and encourage their participation.