SUBJECT: PILOT SOURCE CONTROL AND RECOGNITION PROGRAM FOR MOBILE CLEANERS - Status Report

DISCUSSION: The intent of this item is to inform the Board on this pilot program and to raise issues pertinent to its success. The pilot program is noteworthy for two reasons: it targets a largely unregulated source of polluted discharges to waters in the Region; and it is an outreach based program, based on resolving problems through involvement and education of all affected parties. The pilot program emphasizes recognition of good businesses versus “bad actors”.

A major action area of municipal storm water management programs is the elimination and prevention of discharges other than storm water to storm drain systems. Washwaters are some of the more commonly observed “non-storm water discharges”. Specifically, mobile cleaners (surface cleaners, janitorial services, auto detailers, carpet cleaners, window cleaners) have been identified as a significant source of discharges of material, wastes, and polluted waters to storm drain systems in the San Francisco Bay Area. However, these discharges are difficult to deal with because of the variable quantity and quality of the discharge, the intermittent nature of the discharge, and the mobility of the discharger. Consequently, we have worked with the Bay Area Stormwater Management Agencies Association (BASMAA) on the development of a pilot source control/recognition program for mobile cleaners to resolve these issues.

The pilot program focusses on surface cleaners as a target group of mobile cleaners. Surface cleaners include steam cleaners and pressure washers that clean sidewalks, plazas, parking areas, driveways, drive-throughs, and building exterior surfaces. The surface cleaner pilot program will be used as a prototype for developing materials and approaches for the remaining types of mobile cleaners.

To develop the surface cleaners pilot program, meetings were held with surface cleaners and their customers in which the participants were given a chance to express opinions on what would constitute a successful program. One finding was that customers need educating, as well as the surface cleaners, to ensure that the value of hiring a responsible surface cleaner is understood. As a result, a program consisting of education and recognition has been produced. Surface cleaners who demonstrate awareness of and implement the prescribed pollution prevention practices will be issued a “recognition letter”. The list of recognized cleaners will be provided to businesses and agencies that hire surface cleaners.
To date, the pilot program has completed the development of outreach material (including identification of pollution prevention practices) and scheduled an outreach/recognition workshop for surface cleaners on August 13, 1996. The main premise behind the pollution prevention measures is that washwaters containing soaps or other cleaning agents are toxic and should not be discharged to storm drains. There are scenarios, however, in which discharges would not be considered polluted if the appropriate pollution prevention measures are implemented, and as such, discharge to storm drains would be allowed. The complete list of the outreach materials and events scheduled are described in Appendix A.

We have also sent outreach letters to entities affected by the program to make them aware of the program and how it may affect them and to solicit their cooperation and participation. These include surface cleaners and cleaning equipment distributors, surface cleaner customers, wastewater treatment authorities, municipal storm water management programs, and municipal departments that hire or inspect mobile cleaners. Issues pertinent to these entities and recommended actions are described in Appendix A.

One of the outstanding issues that still needs to be resolved pertains to acceptance of these washwaters by wastewater treatment authorities. Currently, conditions for acceptance of these discharges do not exist or otherwise vary in terms of quantity and quality criteria and disposal costs. For example, some systems will readily accept these discharges, while others impose conditions and costs that may be prohibitive. We intend to work with the Bay Area Dischargers Association and the Bay Area Pollution Prevention Group to resolve this issue. Our intent is to promote acceptance of these discharges such that recognized cleaners are provided incentive and reward for their efforts, and wastewater treatment authorities are provided appropriate credit for acceptance of new discharges.

Another issue concerns the appropriate mechanism for Regional Board endorsement of the program and the proposed allowance of certain discharges to storm drains. Potential actions may include prohibition of discharges that are not in accordance with prescribed pollution prevention measures, NPDES permit(s) for certain discharges, or non-regulatory endorsement of “recognized mobile cleaners”. These and other options will be evaluated during the pilot program, and we will provide the Board with regular updates on the progress of the program.

RECOMMENDATION:

This is an information item. No action is necessary at this time.

Appendices:

A - Outreach Materials and Scheduled Events
Affected Entities, Issues, and Recommended Actions
PILOT SOURCE CONTROL AND RECOGNITION PROGRAM
FOR MOBILE CLEANERS

Outreach Materials and Scheduled Events

"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.

"We'll do the Job Right!" - This card will be distributed by "Recognized Mobile Cleaners" to potential customers. Surface cleaners will use this card to proclaim their qualifications and their intent to prevent water pollution while conducting the cleaning work.

"When You Contract for Surface Cleaning....." - This flyer is geared towards 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 surface cleaning discharges to the storm drain system. The flyer is suitable for photocopying and will be made available for mass mailings by the municipalities.

Pollution Prevention Voucher - The voucher is to be filled out in duplicate by a Recognized Mobile Cleaner upon completion of a cleaning project. Retention of a copy by both the cleaner and the customer provides a record for municipal or State inspectors of the type of surface cleaned, the cleaning method used, and how the wash water was disposed.

Outreach/Recognition Workshop - Outreach workshops will be held to provide surface cleaners with the technical information required to protect the environment, comply with the law, and become a Recognized Mobile Cleaner. The first workshop is scheduled for August 13 and two additional workshops are in the planning stages. The workshops will be videotaped for viewing by surface cleaners who were unable to attend one of the scheduled dates.

Recognition Test and Letter - The true/false, multiple choice exam will take 15-20 minutes to complete. Surface cleaners that correctly answer a minimum percent of the questions will receive a "recognition letter" from BASMAA. This letter can be displayed to customers as proof that the cleaner is qualified to complete the job in an environmentally responsible manner.

Database of Recognized Cleaners - BASMAA will prepare and update a database of Recognized Mobile Cleaners. 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.

Workshop Training Kit - A workshop training kit will be assembled to allow municipalities and/or wastewater treatment authorities the opportunity to offer the Outreach/Recognition Workshop at their discretion. Included in the kit will be a videotape of one of the scheduled workshops, outreach materials to be distributed, the recognition test, a scoring key, and instructions on how to conduct the workshop and administer the test.
# PILOT SOURCE CONTROL AND RECOGNITION PROGRAM FOR MOBILE CLEANERS

## Affected Entities, Issues, and Recommended Actions

<table>
<thead>
<tr>
<th>ENTITY</th>
<th>ISSUES</th>
<th>RECOMMENDED ACTIONS</th>
</tr>
</thead>
</table>
| Surface Cleaner | • Surface cleaners are liable for pollutant discharges to the storm drain system resulting from their cleaning activities.  
• Municipalities will soon be enforcing discharge prohibitions more reliably and possibly more severely.  
• An opportunity is available for surface cleaners to become educated on appropriate methods of wash water disposal and gain some good publicity for environmentally responsible cleaning. | • Participate in the program by attending a source control / recognition workshop and becoming a Recognized Mobile Cleaner.  
• Use pollution prevention practices when cleaning. |
| Surface Cleaner Customer | • Surface cleaner customers are liable for pollutant discharges to the storm drain system resulting from contracted cleaning activities.  
• Municipalities will soon be enforcing discharge prohibitions more reliably and possibly more severely.  
• Customers will be required to take responsibility for the method of disposal utilized by a contracted cleaner. | • Participate by becoming familiar with the prescribed pollution prevention practices.  
• Make use of mobile cleaners who participate in the program by only hiring "Recognized Mobile Cleaners".  
• Supervise contracted cleaners to ensure that appropriate pollution prevention practices are used to dispose of any wash water generated from their activities. |
| Wastewater Treatment Authority | • Wash water determined to be inappropriate for disposal in the storm drain system may be discharged to the sewer system.  
• Mobile cleaners are being directed to contact the local wastewater authority for discharge requirements prior to disposal in the sewer system. | • Participate by becoming familiar with the prescribed pollution prevention practices and incorporating them into pretreatment or pollution prevention programs if appropriate.  
• Assist mobile cleaners who call for advice in determining acceptability of their wash water for sewer disposal. |
| Municipality | • A key component of the municipal storm water permit program is the effective prohibition of non-storm water discharges to storm drain systems.  
• Municipalities and businesses that hire mobile cleaners are liable for discharges from these cleaning activities. | • Participate by becoming familiar with the prescribed pollution prevention practices and incorporating them into the municipality's own storm water management program.  
• Become aware of surface cleaners and customers in the municipality's jurisdiction.  
• Make use of mobile cleaners who participate in the program by only hiring "Recognized Mobile Cleaners". |