

# **Source Control and Recognition Program for Mobile Cleaners**

## **Frequently Asked Questions**

- 1) Question: Why are mobile surface cleaning activities so difficult to deal with?

Answer: They 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.

- 2) Question: What is the Source Control Program for Mobile Cleaners?

Answer: The Source Control Program for Mobile Cleaners is a regional program initiated by the Bay Area Stormwater Management Agencies Association (BASMAA) and the San Francisco Bay Area Regional Water Quality Control Board. It is designed to help break through barriers to pollution control and establish a model for dealing with mobile surface cleaning discharges.

The program is noteworthy because:

- 1) It is an outreach-based program designed to resolve problems through involvement and education of affected parties.
- 2) Emphasizes recognition of good businesses versus “bad actors.”

- 3) Question: Why are mobile cleaner discharges a concern?

Answer: One of the two primary goals of the federal storm water regulations and NPDES storm water permits is to “effectively prohibit” non-stormwater discharges to storm drain systems.

Washwaters are some of the more commonly observed non-storm water discharges.

Mobile cleaners have been identified as a significant discharger of material, wastes, and polluted waters to storm drain systems in the San Francisco Bay Area and other parts of the country.

- 4) Question: Why was an outreach and recognition approach chosen to address mobile cleaner discharges?

Answer: Discharges from mobile cleaners are intermittent in nature, often small (few hundred gallons) and may occur during non-business hours. As a result, they are difficult to regulate in the traditional sense.

In discussions with cleaners, their suppliers, Regional Board staff and municipal staff and their consultants, a consensus was reached that a successful program should also include as much education for customers of mobile cleaners since they are also liable for discharges. In addition, this approach ensures the value of hiring a responsible cleaner. As a result, a program of education and recognition was produced.

- 5) Question: How many mobile cleaners are there in the Bay Area?

Answer: A search conducted in 1995 revealed approximately 4,000 mobile cleaning businesses. This count includes surface cleaners, janitorial services, auto detailers, carpet cleaners and window washers.

6) Question: Who are “surface cleaners?”

Answer: Surface cleaners are a subset of mobile cleaners that clean flat surfaces or “flat work.”

Surface cleaned include sidewalks, plazas, building exteriors, drive-through areas, cement parking areas and driveways, decks, and dumpster/grease cleaning and storage areas at restaurants and food handling establishments. Surface cleaning may also involve surface preparation before painting and graffiti removal.

There are approximately 150 to 200 surface cleaners in the Bay Area.

7) Question: What information or data is there on these types of discharges?

Answer: Some data exists on the quality and quantity of these discharges. In 1999, the Bay Area Pollution Prevention Group completed a study of surface cleaner discharges. Their study looked at discharges from local cleaners and data from Arizona and Texas.

**Results**

The volume of wastewater discharged by surface cleaning operations in the Bay Area is small.

Samples indicated the presence of cadmium, copper, lead, mercury, zinc, pH, oil and grease, and total petroleum hydrocarbons.

In some instances, concentrations violated discharge standards for wastewater treatment (“local limits”).

A case study in Fort Worth, Texas indicated the presence of detergents in over 50 % of the samples collected from storm drain discharges.

Repeated field observations identified mobile cleaning activities as a significant source.

8) Question: What best management practice (BMP) sources are available and acceptable?

Answer: There are basically two sources

The original BMPs developed by the Cleaning Equipment Trade Association (CETA) (referred to as the “CETA BMPs”) in cooperation with the three South Bay treatment plants and the Santa Clara Valley Nonpoint Source Pollution Control Program cover almost all outdoor cleaning activities.

The second source, *Pollution from Surface Cleaning*, only covers surface cleaning activities, was developed by BASMAA and an advisory committee of representatives from CETA, mobile cleaners, and treatment plants. In developing *Pollution from Surface Cleaning*, small changes to the CETA BMPs for some surface cleaning activities were made to clarify and simplify decision making for cleaners while on job sites.

9) Question: What does the recognition mean?

Answer: The blue “Certificate of Training” means that the surface cleaner has:

- 1) Received training;
  - 2) Taken a self quiz on the training materials;
  - 3) “Agrees to follow, to the greatest practical extent, pollution prevention practices including techniques for proper cleaning and wash water disposal as described in the BASMAA mobile cleaner’s training materials.”
- 10) Question: How does a surface cleaner get recognition?
- Answer: Training is available from selected stormwater programs, municipalities, and wastewater treatment plants in the San Francisco Bay Area. Individuals interested in getting training should contact BASMAA or refer to the list of trainers involved in BASMAA’s Surface Cleaner Recognition Program.
- 11) Question: How do I find “Recognized Mobile Cleaners?”
- Answer: BASMAA keeps and updates 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 jobs.