

Mobile Business Pilot Program: Surface Cleaners Implementation Strategy



September 2010

*A cooperative project of the County of Orange,
the Orange County Flood Control District, and the cities of Orange County*



Table of Contents

Executive Summary

1.0	Introduction.....	1
2.0	Permit Requirements.....	2
2.1	Santa Ana Permit Requirements	4
2.2	San Diego Permit Requirements	4
2.3	Surface Cleaner Definition	5
3.0	Inventory.....	6
3.1	Permit Requirements.....	6
3.2	Approach.....	6
3.3	Inventory Fields	8
3.4	Maintenance and Update of Inventory.....	9
4.0	Best Management Practice (BMP) Identification	11
4.1	Permit Requirements.....	11
4.2	Approach.....	11
4.2.1	Surface Cleaner BMP Fact Sheet.....	11
5.0	Outreach	12
5.1	Permit Requirements.....	12
5.2	Approach.....	12
5.2.1	Outreach Mechanisms.....	12
6.0	Inspection/Self-Certification	14
6.1	Permit Requirements.....	14
6.2	Relationship to Existing Programs.....	14
6.3	Approach.....	14
7.0	Enforcement	18
7.1	Permit Requirements.....	18
7.2	Approach.....	18
7.2.1	Enforcement Actions	18
8.0	Evaluation of Mobile Business Pilot Program	20
9.0	Implementation Schedules	21

List of Tables

Table 1. Summary of Permit Requirements for Mobile Business Programs	3
Table 2. Summary of Codes Describing Surface Cleaner Operations/Activities	5
Table 3. Information to be Tracked by Surface Cleaner Inventory	8
Table 4. Surface Cleaner Suppliers Located in Orange County (as of July 2010)	13
Table 5. Implementation Schedule for Mobile Business Pilot Program: Surface Cleaners	21
Table 6. Implementation Schedule for Mobile Business Pilot Program: Surface Cleaners, by Permit Year	22
Table 7. Implementation Schedule for San Diego Region Program to Address Other Mobile Business Categories on a Rotating Basis	23

List of Figures

Figure 1. Inspection/Self-Certification Process	15
Figure 2. Online Training Program Process	16

Attachments

- Attachment A. Model Surface Cleaner BMP Fact Sheet
- Attachment B. Summary of Other Stormwater Program Approaches for Mobile Businesses

Executive Summary

The municipal stormwater permits for the Santa Ana and San Diego Regions¹ require the County of Orange, the incorporated cities of Orange County, and the Orange County Flood Control District (collectively Permittees) to develop and implement a program to reduce the discharge of stormwater pollutants to the maximum extent practicable (MEP) and to prohibit non-stormwater discharges.

Since 2002, the Drainage Area Management Plan (DAMP) has included an Existing Development Program element which has required the development of an inventory, the identification of Best Management Practices (BMPs), outreach, inspections, and follow-up enforcement actions for industrial facilities and commercial businesses. In 2009, the adoption of the fourth term municipal stormwater permits resulted in additional regulatory requirements for the Permittees' Existing Development Program for mobile businesses.

This implementation strategy document has been created to address the permit requirements and identify the framework for a mobile business pilot program (pilot program) targeting a specific category of mobile businesses, surface cleaners. The recommended approach for addressing non-stormwater discharges from mobile surface cleaners includes the following components:

- **Inventory:** Development and maintenance of a web-based, regional inventory of surface cleaner businesses located throughout the County.
- **Best Management Practice (BMP) Identification:** Dissemination of information regarding minimum standards and appropriate BMPs for surface cleaners, as well as proper procedures for waste disposal - presented in the form of a Surface Cleaner BMP Fact Sheet.
- **Outreach:** The information regarding minimum standards, BMPs for surface cleaners, and proper procedures for waste disposal will be distributed via several mechanisms including mailings, websites, suppliers, trade associations, and/or public counters.
- **Inspections/Self-Certification:** A regional training and self-certification program, with inspections conducted as needed, will be developed and implemented to cost-effectively and comprehensively address the inspection requirement.
- **Enforcement:** Enforcement will occur as needed in response to complaints/notifications of illicit discharges involving surface cleaners. Permittees will continue to work cooperatively to address enforcement of surface cleaners, and will utilize the web-based surface cleaner inventory to track the enforcement information and facilitate a regional approach to addressing repeat offenders.

The effectiveness of the pilot program will be evaluated on an annual basis, and the pilot program will be modified as needed. The pilot program will serve as a template and framework for the development of implementation strategies for addressing other mobile business categories.

¹ Order No. R8-2009-0030, NPDES No. CAS618030 (Santa Ana Permit) and Order No. R9-2009-0002, NPDES No. CAS0108740 (San Diego Permit)

1.0 Introduction

The municipal stormwater permits for the Santa Ana and San Diego Regions² require the County of Orange, the incorporated cities of Orange County, and the Orange County Flood Control District (collectively Permittees) to develop and implement a program to reduce the discharge of stormwater pollutants to the maximum extent practicable (MEP) and to prohibit non-stormwater discharges.

Since 2002, the Drainage Area Management Plan (DAMP) has included an Existing Development Program element which has required the development of an inventory, the identification of Best Management Practices (BMPs), outreach, inspections, and follow-up enforcement actions for industrial facilities and commercial businesses. In 2009, the adoption of the fourth term municipal stormwater permits resulted in additional regulatory requirements for the Permittees' Existing Development Program for mobile businesses.

The development of an approach for regulating mobile businesses is more challenging than that for traditional industrial and commercial businesses for several reasons:

- Mobile businesses use equipment and provide services that are transportable, thus they often do not have a primary fixed facility location from which they conduct business.
- Many of the mobile businesses are smaller operations and may not have obtained the necessary municipal business license(s). In addition, some Permittees do not require business licenses within their jurisdiction.
- Mobile businesses are regional in nature. Even if a mobile business is based and/or licensed in one municipality, they often provide services within other municipalities in the region without procuring the appropriate business license(s).
- Mobile businesses can also be characterized as transient; that is, they provide services for short periods of time in many different locations, often conducting the work outside of normal business hours.
- They often use water for cleaning purposes and may not contain the runoff for proper disposal and/or are not aware of the necessary BMPs that should be employed.

These characteristics make it difficult to inventory, outreach to, inspect, and/or enforce against the mobile businesses.

The purpose of this implementation strategy is to identify how the various components of the mobile business pilot program (pilot program) will be developed and implemented. The pilot program recommends an approach for the development and implementation of the inventory, BMP identification, outreach, inspections/self-certification, and enforcement. Once implemented, the pilot program will serve as a template and framework for the development of implementation strategies for addressing other mobile business categories. The Permittees will implement this approach in each of their respective jurisdictions.

² Order No. R8-2009-0030, NPDES No. CAS618030 (Santa Ana Permit) and Order No. R9-2009-0002, NPDES No. CAS0108740 (San Diego Permit)

2.0 Permit Requirements

The permit requirements for the mobile business programs, which differ slightly for the Santa Ana and San Diego Regions, are summarized in **Table 1**. The primary difference between the two Permits is that the Santa Ana Permit requires the development of a pilot program to address one mobile business category, whereas the San Diego Permit requires the development of a program to address all mobile business categories. Both sets of permit requirements are addressed within this implementation strategy.

Table 1. Summary of Permit Requirements for Mobile Business Programs

Implementation Strategy Section	Requirement	Permit Section	
		Santa Ana ³	San Diego ⁴
Overview	<ul style="list-style-type: none"> The Permittees shall develop a mobile business pilot program. The pilot program shall address one category of mobile business from the following list: mobile auto washing/detailing; equipment washing/cleaning; carpet, drape and furniture cleaning; mobile high pressure or steam cleaning. 	X.8	
	<ul style="list-style-type: none"> Each Copermittee must develop and implement a program to reduce the discharge of stormwater pollutants from mobile businesses to the MEP and to prohibit non-stormwater discharges pursuant to Section B of this Order. 		F.3.b.(3)(a)
Inventory	<ul style="list-style-type: none"> Each Copermittee must keep as part of their commercial source inventory a listing of mobile businesses known to operate within its jurisdiction. 		F.3.b.(3)(a)
BMP Identification	<ul style="list-style-type: none"> The pilot program shall include outreach materials for the business. The Permittees shall also develop and distribute the BMP Fact Sheets for the selected mobile businesses. At a minimum, the mobile business Fact Sheets should include: laws and regulations dealing with urban runoff and discharges to storm drains; appropriate BMPs and proper procedure for disposing of wastes generated. 	X.8	
	<ul style="list-style-type: none"> The program must include development and implementation of minimum standards and BMPs to be required for each of the various types of mobile businesses. 		F.3.b.(3)(a)(i)
Outreach	<ul style="list-style-type: none"> The program must include development and implementation of an outreach and education strategy. 		F.3.b.(3)(a)(iv)
	<ul style="list-style-type: none"> The pilot program shall include at least two notifications of the individual businesses operating within the County regarding the minimum source control and pollution prevention measures that the business must implement. 	X.8	
Inspections/ Self-Certification	<ul style="list-style-type: none"> The program must include notification of those mobile businesses known to operate within the Copermittee's jurisdiction of the minimum standards and BMP requirements and local ordinances. 		F.3.b.(3)(a)(iii)
	<ul style="list-style-type: none"> The program must include inspection of mobile businesses as needed to implement the program. 		F.3.b.(3)(a)(v)
Enforcement	<ul style="list-style-type: none"> The pilot program shall include an enforcement strategy to address mobile businesses. 	X.8	
	<ul style="list-style-type: none"> The program must include development and implementation of an enforcement strategy which specifically addresses the unique characteristics of mobile businesses. 		F.3.b.(3)(a)(ii)

³ Begins p. 45 of Santa Ana Permit

⁴ Begins p. 61 of San Diego Permit. The Permit also states, "If they choose to, the Copermittees may cooperate in developing and implementing their programs for mobile businesses, including sharing of mobile business inventories, BMP requirements, enforcement action information, and education" (F.3.b.(3)(b)).

2.1 SANTA ANA PERMIT REQUIREMENTS

The Santa Ana Permit requires the Permittees to develop and implement a mobile business pilot program for one of the following categories of mobile businesses:

- Mobile auto washing/detailing
- Equipment washing/cleaning
- Carpet, drape and furniture cleaning
- **Mobile high pressure or steam cleaning**

The category selected for the Santa Ana pilot program is “mobile high pressure or steam cleaning”, also known as “surface cleaners”.

2.2 SAN DIEGO PERMIT REQUIREMENTS

The San Diego Permit requires the Permittees to develop and implement a mobile business program for all categories of mobile businesses. The following commercial business categories⁵ have been identified as mobile businesses.

- [f] Mobile automobile or other vehicle washing;
- [i] Pest control services;
- [k] Mobile carpet, drape or furniture cleaning;
- [l] Cement mixing or cutting;
- [m] Masonry;
- [n] Painting and coating;
- [p] Landscaping;
- [t] Pool and fountain cleaning;
- [v] Portable sanitary services;
- [y] Mobile pet services;
- **[z] Power washing services**

The San Diego Permittees will address this requirement with a phased approach that is initiated with the pilot program for “power washing services”, also known as “surface cleaners”. The pilot program will allow the Permittees to develop, implement, and evaluate the approach for one mobile business category. This will ensure a greater degree of success and use of resources than if the Permittees attempted to target all mobile business categories at one time. In addition, the implementation of a pilot program will allow the Permittees to identify and address any issues prior to its expansion to additional mobile business categories. The additional mobile business

⁵ Commercial Sites/Sources, as outlined in section F.3.b.(1)(a)(i) of the San Diego Permit

categories for the San Diego Region will be addressed on a rotating basis over the remainder of the Permit term (see **Table 7**).

2.3 SURFACE CLEANER DEFINITION

A surface cleaning business is considered to be any operation that identifies a primary North American Industry Classification System (NAICS) code of 561790 (Other Services to Buildings and Dwellings)⁶ or a Standard Industrial Classification (SIC) code of either 4959 (Sanitary Services, Not Elsewhere Classified)⁷ or 7349 (Building Cleaning and Maintenance Services, Not Elsewhere Classified)⁸ for the operations at their business (**Table 2**).

Table 2. Summary of Codes Describing Surface Cleaner Operations/Activities

NAICS Code	SIC Code	Description
561790	4959	Cleaning (e.g., power sweeping, washing) driveways and parking lots
561790	4959	Driveway cleaning (e.g., power sweeping, washing) services
561790	4959	Parking lot cleaning (e.g., power sweeping, washing) services
561790	7349	Cleaning building exteriors (except sand blasting, window cleaning)
561790	7349	Power washing building exteriors
561790	7349	Steam cleaning building exteriors
561790	None	Pressure washing (e.g., buildings, decks, fences)

⁶ <http://www.naics.com/censusfiles/ND561790.HTM>

⁷ http://www.osha.gov/pls/imis/sic_manual.display?id=956&tab=description

⁸ http://www.osha.gov/pls/imis/sic_manual.display?id=269&tab=description

3.0 Inventory

3.1 PERMIT REQUIREMENTS

The Permit requirements for a mobile business inventory are as follows:

- **Santa Ana Region:** No specific inventory requirements
- **San Diego Region:** Each Permittee must keep as part of their commercial source inventory a listing of mobile businesses known to operate within its jurisdiction.

Although the Santa Ana Region Permittees are not required to complete an inventory, the development and maintenance of a regional inventory of surface cleaner businesses located throughout the County, including those businesses operating within the Santa Ana Region, provides an essential component of the overall pilot program.

The Permittee responsibility for this requirement is determined by the jurisdiction in which the business has a permanent address—also referred to as the “home base jurisdiction”.

3.2 APPROACH

The inventory, in the form of a web-based database application, will be developed by the Permittees by the end of 2010 (see **Table 5**). The inventory will be password-protected with unique log-in information for each Permittee. The inventory will serve as a repository for the information for each business pertaining to inspection/self-certification, outreach, and enforcement actions.

The Permittees may obtain information for the initial database entries from existing and new business licenses (for those Permittees who have business licenses); however, it will be necessary to supplement the existing business license information with information for unlicensed businesses as additional information is obtained.

Business license information for surface cleaners, as well as businesses advertising surface cleaning services, will be used as a starting point for the inventory. This list may be supplemented with information from other resources, such as the Yellow Pages⁹, Craigslist¹⁰, and the Penny Saver.¹¹ The database will include a relational table of Permittee jurisdictions where each business operates; this information will be derived from various sources, including business licenses, advertisements, and records of enforcement actions taken against specific businesses. A multi-source approach to the inventory will help to create a comprehensive inventory of the known surface cleaning businesses operating within Orange County.

As the inventory is populated by each Permittee, each identified business will be called to verify that it is still in business and provides surface cleaning services in the Orange County area.

⁹ <http://www.yellowpages.com>

¹⁰ <http://orangecounty.craigslist.org/>

¹¹ <http://www.pennysaverusa.com>

The inventory will include surface cleaners located within the following areas:

Santa Ana Region	San Diego Region
<ul style="list-style-type: none">• County of Orange• Orange County Flood Control District• City of Anaheim• City of Brea• City of Buena Park• City of Costa Mesa• City of Cypress• City of Fountain Valley• City of Fullerton• City of Garden Grove• City of Huntington Beach• City of Irvine• City of Laguna Hills• City of Laguna Woods• City of La Habra• City of La Palma• City of Lake Forest• City of Los Alamitos• City of Newport Beach• City of Orange• City of Placentia• City of Santa Ana• City of Seal Beach• City of Stanton• City of Tustin• City of Villa Park• City of Westminster• City of Yorba Linda	<ul style="list-style-type: none">• County of Orange• Orange County Flood Control District• City of Aliso Viejo• City of Dana Point• City of Laguna Beach• City of Laguna Hills• City of Laguna Niguel• City of Laguna Woods• City of Lake Forest• City of Mission Viejo• City of Rancho Santa Margarita• City of San Clemente• City of San Juan Capistrano

3.3 INVENTORY FIELDS

The information that will likely be tracked by the inventory is summarized in **Table 3**.

Table 3. Information to be Tracked by Surface Cleaner Inventory

Inventory Field	Explanation	Field Type
Unique Business Identification Number		Mandatory
Primary Source	Primary source of business information	Mandatory
Secondary Source	Additional source of business information	Optional
Source Notes	Comments regarding source	Optional
Verified	Specific business has been called and verified	Optional
Date Last Updated	Last date information for specific business was updated	Mandatory
Business Name		Mandatory
Street		Mandatory
City		Mandatory
State		Mandatory
Zip Code		Mandatory
Business Phone		Mandatory
Name of Owner		Mandatory
Address of Owner	If different from business address	Optional
Email Address of Owner	Allows for ease of mass communication	Optional
Home Base Jurisdiction	Jurisdiction in which business has permanent address – this will be used to determine which Permittee has jurisdiction for the inventory and outreach responsibilities	Mandatory
Jurisdiction Where Operates	Relational table of Permittees’ jurisdictions will be used to manage information regarding where the business operates	Mandatory
Business License(s)	Relational table of Permittees’ jurisdictions will be used to manage information regarding business licenses	Mandatory
SIC Code	Fill out once verified (i.e., 4959 or 7349)	Mandatory
SIC Description	Fill out once verified (i.e., “Sanitary Services, Not Elsewhere Classified” or “Building Cleaning and Maintenance Services, Not Elsewhere Classified”)	Optional
NAICS Code	Fill out once verified (i.e., 561790)	Mandatory

Inventory Field	Explanation	Field Type
US NAICS Title	Fill out once verified (i.e., "Other Services to Buildings and Dwellings")	Optional
1 st Notification Sent	First letter requesting that the business complete the online training or the self-certification form	Mandatory
2 nd Notification Sent	Second letter requesting that the business complete the online training or the self-certification form or the business will be subject to an inspection	Mandatory
Outreach/Education Provided	Noted if additional information is distributed	Optional
Training Completed (1 st End Point)	Business successfully completed the online training – this is the 1 st end point for inspection/self-certification requirement	Optional
Self-Certification Completed (2 nd End Point)	Business turned in the self-certification form – this is the 2 nd end point for inspection/self-certification requirement	Optional
Inspection Conducted (3 rd End Point)	Business inspected by the Permittee – this is the 3 rd end point for inspection/self-certification requirement	Optional
Permittee Taking Enforcement Action	Relational table of enforcement actions from multiple Permittees' jurisdictions will be used to allow Permittees to view violations occurring within all jurisdictions. The Permittee with jurisdiction for an incident is determined by the location of the incident.	Mandatory
Enforcement Actions Taken	Relational table of enforcement actions from multiple Permittees' jurisdictions will be used to allow Permittees to view violations occurring within all jurisdictions	Mandatory
Additional Comments		Optional

3.4 MAINTENANCE AND UPDATE OF INVENTORY

The inventory will be maintained and updated on an annual basis directly by the Permittees. The Permittees will check other resources for surface cleaning businesses. Any businesses found will either be added to the inventory or categorized in additional inventory fields as follows:

- **Out of Business** – Some surface cleaners may be listed in various sources as functioning businesses, but a verification check may reveal that they are no longer in business.
- **Other Business Type** – Some businesses may appear to be surface cleaners or offer surface cleaning services due to their business name. Those in question should be verified; if they are not surface cleaners, they should not be included in the inventory.
- **Out of Region** – Some surface cleaners may advertise themselves as "Serving the Orange County Area"; however, they may not be physically located within Orange

County or may not actually provide services within the Orange County area.¹² In addition, some may only provide 800 or 866 phone numbers, making it difficult to verify a location.

These additional inventory fields will help ensure that in the future, businesses that have been previously verified as being out of business, another business type, or located outside of (*and* not providing services within) the Orange County region are not inadvertently included in the inventory.

The database will have the capability to generate reports according to jurisdiction, watershed, violations, and business classifications. Changes to the database can be made directly by the Permittees. If changes are made to a business entry, an automatic email will be sent to the home based jurisdiction as well as the other jurisdictions that the business is operating in. If a business changes addresses, a jurisdiction can make a change identifying that the business is now based in its jurisdiction; however, a jurisdiction cannot make the change to identify that the home base of a business is now in another jurisdiction.

¹² These businesses will be identified on an ongoing basis by the Permittees during the inventory verification process. If a business is identified as providing their core services in jurisdictions outside of Orange County, then they will be identified as “Out of Region” so that they are not inadvertently included within the program. On the other hand, if a surface cleaner located outside of the Orange County area has a business license to operate within a Permittee’s jurisdiction, this business should be included in the inventory.

4.0 Best Management Practice (BMP) Identification

4.1 PERMIT REQUIREMENTS

The Permit requirements for outreach materials are as follows:

- **Santa Ana Region:** The pilot program shall include outreach materials for the business. The Permittees shall also develop and distribute the BMP Fact Sheets for the selected mobile businesses. At a minimum, the mobile business Fact Sheets should include: laws and regulations dealing with urban runoff and discharges to storm drains; appropriate BMPs and proper procedure for disposing of wastes generated.
- **San Diego Region:** The program must include development and implementation of minimum standards and BMPs to be required for each of the various types of mobile businesses.

The Permittees will identify minimum standards and appropriate BMPs for surface cleaners, as well as proper procedures for waste disposal, and develop a summary of this information in the form of a fact sheet. This requirement will be met by the Permittees working together.

4.2 APPROACH

Commercial businesses, including surface cleaners, are required to reduce pollutants in stormwater discharges, and unauthorized non-stormwater discharges by these businesses to the storm drain system are prohibited. Although the Permittees may provide guidance to surface cleaners on appropriate best management practice (BMP) selection and application, the selection of specific BMPs to be implemented is the responsibility of each surface cleaning business. Surface cleaners will most likely not have a fixed facility center of operations; as such, BMPs will be field-based and focus on activities taking place at a job site.

4.2.1 Surface Cleaner BMP Fact Sheet

In order to assist surface cleaners in selecting and implementing the appropriate types of BMPs, a Model Surface Cleaner BMP Fact Sheet has been developed (**Attachment A**). The Model Surface Cleaner BMP Fact Sheet was based on an existing Permittee document, "IC24. Disposal of Wastewater Generated by Mobile Businesses and Outdoor Activities".¹³ The Model Surface Cleaner BMP Fact Sheet may be customized by each Permittee to develop it into a business education outreach piece and to include information regarding their local ordinances and/or contacts.

¹³ Available at: http://www.ocwatersheds.com/Documents/IC24_WastewaterDisposal.pdf

5.0 Outreach

5.1 PERMIT REQUIREMENTS

The Permit requirements for mobile business notification and outreach are as follows:

- **Santa Ana Region:** The pilot program shall include at least two notifications of the individual businesses operating within the County regarding the minimum source control and pollution prevention measures that the business must implement.
- **San Diego Region:** The program must include development and implementation of an outreach and education strategy. The program must include notification of those mobile businesses known to operate within the Copermitttee’s jurisdiction of the minimum standards and BMP requirements and local ordinances.

The Permittees will distribute information regarding minimum standards and appropriate BMPs for surface cleaners, as well as proper procedures for waste disposal, as described within the Surface Cleaner BMP Fact Sheet. The distribution of materials occurs on an ongoing basis.

The Permittee responsibility for this requirement is determined by the jurisdiction in which the business has a permanent address—also referred to as the “home base jurisdiction”.

5.2 APPROACH

The challenge in providing outreach to mobile businesses is to identify mechanisms for outreach, since not all surface cleaners will obtain a business license, and not all surface cleaners will have a fixed facility. It may be necessary to utilize additional outreach mechanisms to reach non-inventoried and/or unlicensed businesses, as well as businesses that will be newly licensed after the inventory is complete. Outreach to surface cleaners will include the distribution of the Surface Cleaner BMP Fact Sheet to businesses utilizing several mechanisms. The Permittees will outreach to inventoried surface cleaners primarily via the self-certification mailings (see Inspection/Self-Certification section). The goal of this approach is to increase surface cleaners’ awareness of water quality issues and promote compliance with the regulations.

5.2.1 Outreach Mechanisms

The Permittees’ existing and potential mechanisms for distribution of outreach materials, including the Surface Cleaner BMP Fact Sheet, have been identified and are summarized below:

- **Inspection/Self-certification form mailings.** These mailings will occur twice during each permit term. For the current permit term, the mailings will occur May 2011 and May 2013 (see **Table 6**).
- **Permittee web sites** (e.g., <http://ocwatersheds.com>). The Surface Cleaner BMP Fact Sheet will be distributed as part of the notification mailings, and will be made available on the Permittees’ web sites.
- **Outreach via suppliers.** The Permittees will work within the surface cleaner industry to provide outreach by partnering with suppliers. The suppliers listed in **Table 4** are located in the Permittees’ jurisdictions. This table will be updated by the Permittees as new information is obtained. The Permittees will contact these suppliers—and others as they

are identified—to see if they are willing to have copies of the Surface Cleaner BMP Fact Sheet and other applicable outreach materials available for customers in their stores.

- **Permittee Business License Departments/Divisions** - The Surface Cleaner BMP Fact Sheet will be made available at public counters.

Table 4. Surface Cleaner Suppliers Located in Orange County (as of July 2010)

Supplier Name	Address	City	Zip	Phone No.
<i>Santa Ana Region</i>				
Fastenal (CAANA)	1201 E Ball Rd. Unit C&D	Anaheim	92805	714-533-2658
Fastenal (CAAN1)	2940 E. La Palma Ave. Ste B	Anaheim	92806	714-632-1184
Fastenal (CACOS)	3199 Airport Loop Dr. Unit E	Costa Mesa	92626	714-641-1731
Fastenal (CAGAR)	10282 Trask Ave. Unit A	Garden Grove	92843	714-530-6204
Fastenal (CAHUN)	7351 Heil Ave. Ste A	Huntington Beach	92647	714-847-6013
Fastenal (CAMIS)	23854 Via Fabricante Ste D-2	Mission Viejo	92691	949-583-9672
Boyce Industries Inc.	1105 N. Poinsettia St.	Santa Ana	92701	714-667-7111
Water Jetting Equipment ¹⁴	1975 Ritchey St.	Santa Ana	92705	714-259-7700
Fastenal (CATUS)	301 West Dyer Rd. Unit B	Santa Ana	92707	714-751-5548
PSI	7200 Garden Grove Blvd.	Westminster	92683	714-895-6694
<i>San Diego Region</i>				
Hotsy of Southern California ¹⁵	1125 N Kraemer Pl.	Anaheim	92806	714-237-1400

¹⁴ <http://www.waterjettingequipment.com>

¹⁵ <http://www.hotsysocal.com/>

6.0 Inspection/Self-Certification

6.1 PERMIT REQUIREMENTS

The Permit requirements for mobile business inspection are as follows:

- **Santa Ana Region:** No specific inspection requirements.
- **San Diego Region:** The program must include inspection of mobile businesses as needed to implement the program.

Inspections of surface cleaner businesses are challenging because they are often smaller operations lacking a fixed facility location. In addition, the services are provided in many different locations, often outside of normal business hours. Thus, a regional self-certification program—with inspections conducted as needed and as follow-up for non-responsive businesses—will be developed and implemented in order to cost-effectively and comprehensively address this requirement.

Although the Santa Ana Region Permittees are not required to conduct inspections, the fact that surface cleaners operate in multiple jurisdictions means that a comprehensive, regional approach that utilizes self-certification and inspections, as needed, will be effective in sending a consistent message to surface cleaners regarding the regulations and BMPs.

The Permittee responsibility for this requirement is determined by the jurisdiction in which the business has a permanent address—also referred to as the “home base jurisdiction”.

6.2 RELATIONSHIP TO EXISTING PROGRAMS

As a component of the existing Industrial/Commercial Program, the mobile business pilot program will ensure that special attention is given to illegal discharges and illicit connections (ID/IC) caused by surface cleaners; however, any ID/IC that are related to surface cleaners’ activities will be dealt with through the ID/IC Program’s existing process.

6.3 APPROACH

The inspection/self-certification process will be implemented by the Permittees twice during the permit term and has three possible end points (in the order of the most preferred). Meeting any one of the end points satisfies this requirement.

- First End Point – Successful completion of an online training program; or
- Second End Point – Completion of a self-certification form; or
- Third End Point – Inspection conducted by the Permittee (if an inspection is not possible, the business will be identified on a “no-response” list).

The approach is illustrated in **Figure 1** and described in additional detail below.

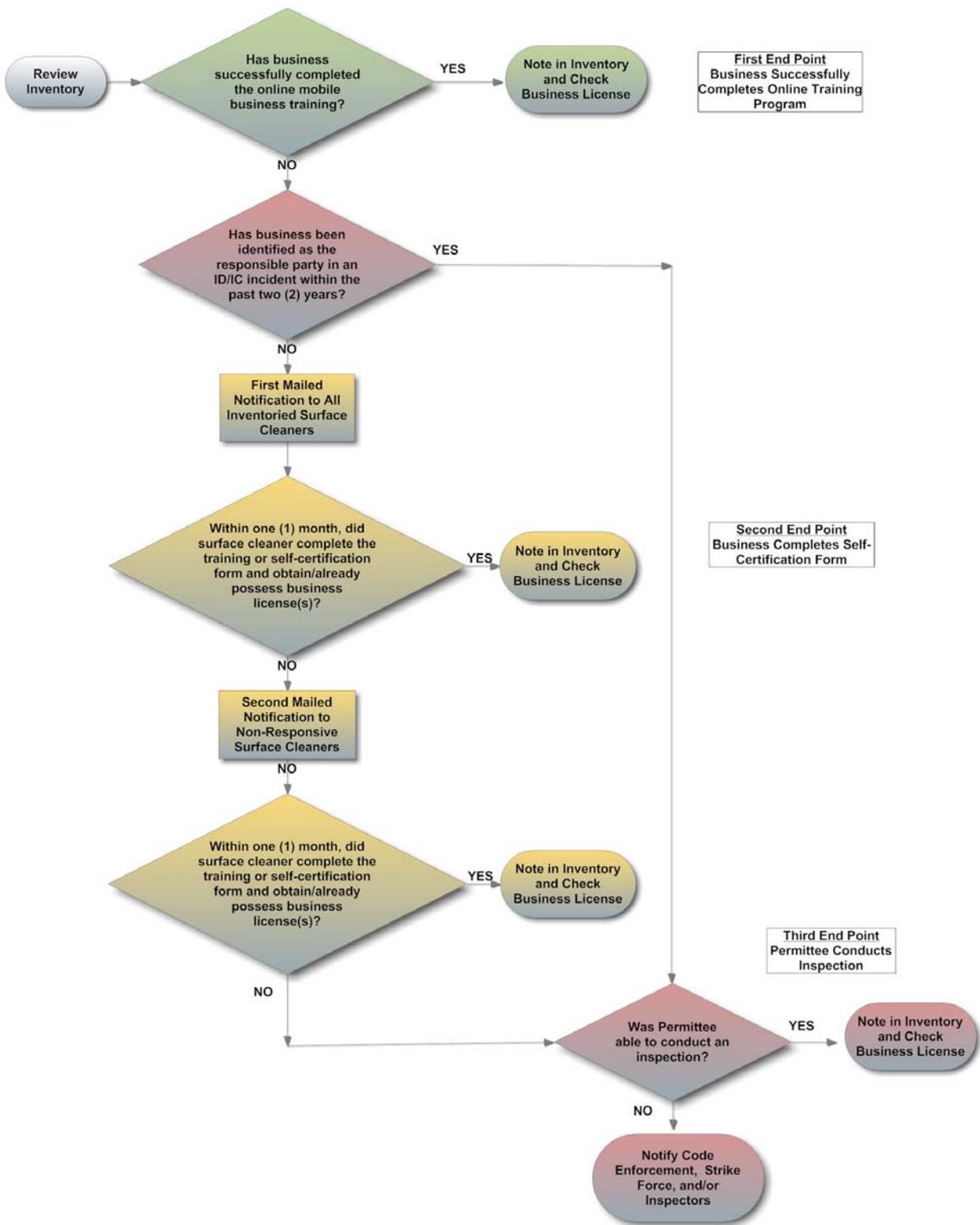


Figure 1. Inspection/Self-Certification Process

- **Business Successfully Completes Online Training Program**

The Permittees will develop a web-based training program and encourage the surface cleaners to complete the training as a part of the inspection/self-certification process. As an incentive to complete the training, the businesses that have successfully completed the training will be included on a list of vendors on the OC Watersheds web site as a “Water Quality Certified Surface Cleaner”.¹⁶ Any Permittee may also choose to include this list on its individual Permittee web site.

The web-based training program will likely be modeled after the existing Bay Area Stormwater Management Agencies Association (BASMAA) “Pollution Prevention Training Program for Surface Cleaners”¹⁷ and will be hosted on a collective Permittee web site. The program will include a 30-minute online presentation on pollution prevention practices, followed by a self-quiz. Upon successful completion of the self-quiz, the online software automatically adds the participant to a tracking database, and the participant is eligible to receive a "Certificate of Training". The Permittees will track which businesses complete the program (see **Figure 2**).

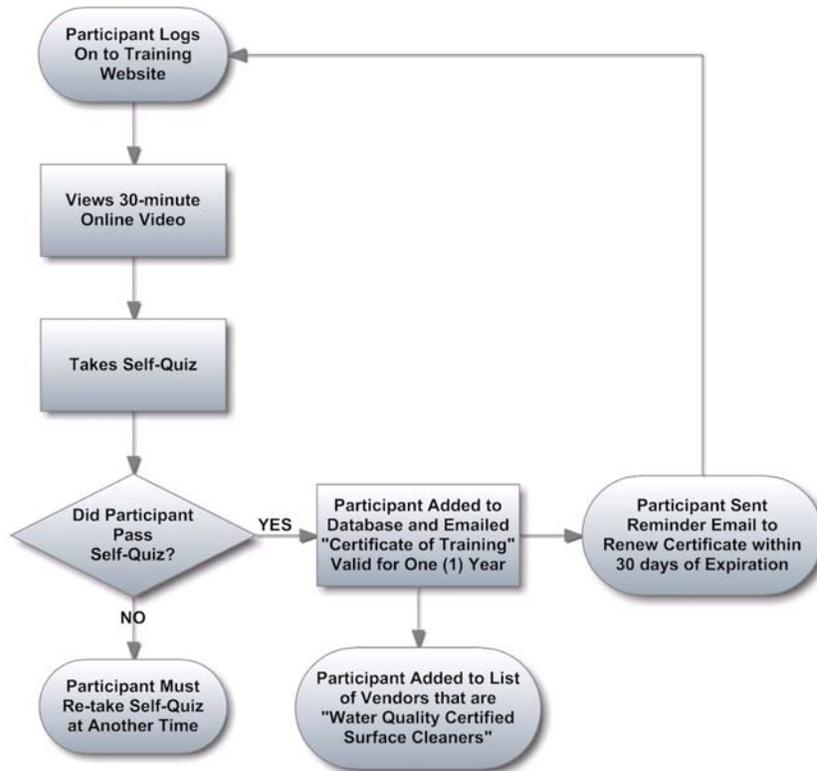


Figure 2.

Training Program Process

Online

¹⁶ The vendor list(s) will indicate that the Permittee does not specifically endorse these businesses. Businesses that have completed the training but that have been found to be the responsible party in an ID/IC incident afterward may be required to re-take the training. Otherwise, the business name may be removed from the list(s) of vendors.

¹⁷ <http://basmaa.org.dnmax.com/Training/tabid/57/language/en-US/Default.aspx>

- **Business Completes a Self-certification Form**

The Permittees will contact all other inventoried surface cleaners by mail to request that they complete either the online training or a self-certification form. This approach will also ensure that the Permittees provide outreach to all inventoried surface cleaners, since educational materials will be provided with the mailing. The mailing will include the following items:

- Cover letter that provides background information on stormwater quality protection and the purpose of the mailing
- Self-certification form for business owner to complete (hard copy)
- Link to web site where self-certification form can be completed electronically
- Summary of business license requirements and the process to apply for a business license, with a link to web site¹⁸
- Surface Cleaners BMP Fact Sheet
- Information on and a link to the web-based training program

Completing the self-certification form will provide each business with an opportunity to evaluate their practices and help ensure that their business is protecting water quality.

The Permittees will follow up with any of the inventoried surface cleaners who have not completed the online training or the self-certification form one month from the initial mailing. Those non-responsive businesses will receive a second notification, reminding the business to complete the online training or self-certification form, otherwise they may be inspected.

- **Permittee Conducts Inspection**

The Permittees will review the surface cleaner inventory to identify businesses that have been found to be the responsible party in an ID/IC incident within the past two years. If this is the case, an announced inspection will automatically be conducted. Since surface cleaner BMPs are field-based and focus on activities taking place at a job site, the necessary inspections will be conducted in the field at a job site when feasible. The results of these inspections will be noted in the surface cleaner inventory.

If a business is not responsive to the Permittees' second request for completing the online training or the self-certification form, they will be contacted and inspected. If the Permittees are unable to contact or inspect a particular business, and/or the business does not possess the applicable business license(s), the Permittees will notify Code Enforcement, the Orange County Hazardous Materials Strike Force (Strike Force), and/or the Authorized Inspector¹⁹ sub-committee of the potentially problematic business. The business will be placed on a "no-response" list.

¹⁸ <http://egov.ocgov.com/ocgov/Business/Permits%20&%20Licensing/Apply%20for%20a%20Business%20License>

¹⁹ "Authorized inspector" is defined within the water quality ordinance. In general, this is the person responsible for investigating water pollution incidents and enforcing the water quality ordinance within the local jurisdiction.

7.0 Enforcement

7.1 PERMIT REQUIREMENTS

The Permit requirements for mobile business enforcement are as follows:

- **Santa Ana Region:** The pilot program shall include . . . an enforcement strategy to address mobile businesses.
- **San Diego Region:** The program must include development and implementation of an enforcement strategy which specifically addresses the unique characteristics of mobile businesses.

The Permittee responsibility for this requirement is determined by the jurisdiction in which the incident occurs.

7.2 APPROACH

The regional and transient nature of mobile businesses means that the Permittees will continue to work cooperatively to address enforcement of surface cleaners. Routine coordination between regional Authorized Inspectors (AIs) occurs through the Inspection Sub-Committee and the Strike Force. The Strike Force is headed by the Orange County District Attorney's (DA) Office and includes representatives of a wide variety of local, regional, and state agencies. AIs communicate through the Strike Force as well as through bimonthly or monthly inspectors' meetings. These mechanisms will provide opportunities for AIs to share information internally about problematic surface cleaners in the region.

Enforcement will occur as needed in response to complaints/notifications of illicit discharges involving surface cleaners.²⁰ Although enforcement will be carried out by the Permittee where the incident occurred, in some cases, joint enforcement may be necessary. The web-based surface cleaner inventory will serve as a tool to track all enforcement information; this will also facilitate a regional approach to addressing repeat offenders.

7.2.1 Enforcement Actions

The Permittees have model progressive enforcement and referral policies in place to address violations by commercial or industrial businesses, including surface cleaners. Enforcement actions match the severity of violation and include distinct, progressive steps. Options are available for progressive corrective actions for repeat offenders. Enforcement options are identified within the individual Permittee ordinances, as well as within the Enforcement Consistency Guide (ECG) for Water Quality Ordinance Implementation (Drainage Area Management Plan Section 4, Exhibit 4.I). The ECG assists stormwater staff in identifying, documenting, and responding to violations of the Ordinance and selecting appropriate enforcement actions and provides a consistent approach to water quality ordinance enforcement throughout Orange County.

²⁰ The enforcement approach and actions taken will be consistent with the local codes and ordinances.

The progressively severe corrective actions that may be utilized are identified in the ECG and include the following:²⁰

- Administrative Remedies
 - Notice of Noncompliance
 - Administrative Compliance Order
 - Cease and Desist Orders
- Criminal Enforcement
 - Misdemeanors
 - Infractions
 - Issuance of Citations

Illicit discharges are addressed in a formal manner through the appropriate administrative remedies. A more severe enforcement option may be selected when a violator has either a history of noncompliance or has failed to take good faith actions to eliminate continuing violations or to meet a previously imposed compliance schedule. Corrective actions are taken in instances where a responsible party is identified. All enforcement actions for specific businesses will be tracked in the web-based inventory, and enforcement actions taken will be related to the issuing jurisdiction. Thus, information for a particular business, including its history of violations, can be queried for any business or within any jurisdiction.

8.0 Evaluation of Mobile Business Pilot Program

In order to assess the effectiveness of the pilot program, the following items may be evaluated each year in conjunction with the Permittees' Annual Report. In addition, other mobile business programs will continue to be evaluated as a part of this process (**Attachment B**). Each Permittee will conduct this evaluation as a part of their annual report and, collectively, the Permittees may find that it is necessary to modify the pilot program based on the evaluation.

Was the program implemented in accordance with the Permit requirements and Implementation Strategy (Level 1 Outcome)?

Inventory

- Developed regional inventory of surface cleaners
- Maintained and updated inventory

BMP Identification

- Identified BMPs and wash water disposal options for surface cleaners

Outreach

- Developed an outreach/education strategy for surface cleaners
- Distributed Surface Cleaner BMP Fact Sheets
- Track total # of Surface Cleaner BMP Fact Sheets distributed each year, by mechanism
- Worked within the industry to provide outreach by partnering with suppliers and industry associations

Inspection/Self-Certification

- Contacted inventoried surface cleaners by mail to request that they fill out a self-certification form and obtain applicable business license(s)
- Developed and implemented a Web-based training program

Enforcement

- Developed an enforcement strategy that specifically addresses surface cleaners
- Enforced against illicit discharges and other stormwater violations by surface cleaners
- Track total # and types of enforcement actions taken against surface cleaners each year

Did the program raise the target audience's awareness of an issue (Level 2 Outcome)?

- # self-certification forms mailed, # and % completed and returned (hard copy, electronic)
- # and % of surface cleaners self-certified, total and year to year
- # and % of surface cleaners successfully completing web-based training program
- # of web site hits for Surface Cleaner BMP Fact Sheets

Did the program change a target audience's behavior, resulting in the implementation of recommended BMPs (Level 3 Outcome)?

- Reduction in # of observed illicit discharges attributed to surface cleaners
- Reduction in # of inspections required for surface cleaners
- % enforcement actions taken, major (court case, etc.) vs. minor (notice of noncompliance)
- # repeat offenders identified, total and year to year

9.0 Implementation Schedules

The implementation schedules below outline tasks and timeframes for both the pilot program and the San Diego Region mobile business program.

The implementation schedule detailing the tasks to be completed for the pilot program is included in **Table 5** and **Table 6**.

Table 5. Implementation Schedule for Mobile Business Pilot Program: Surface Cleaners

Task	Frequency or Due Date
1. Inventory: Create regional inventory	<ul style="list-style-type: none"> • December 16, 2010
2. Inventory: Maintain and update inventory	<ul style="list-style-type: none"> • Annually
3. Inventory: Call each business to verify that it is in business and provides surface cleaning services in the Permittees' jurisdiction. Obtain missing addresses, phone numbers, and other information.	<ul style="list-style-type: none"> • Verify Initial Inventory by April 30, 2011 • Annually in conjunction with inventory update
4. BMP Identification: Develop Surface Cleaner BMP Fact Sheets	<ul style="list-style-type: none"> • December 16, 2010
5. Outreach: Distribute Surface Cleaner BMP Fact Sheets	<ul style="list-style-type: none"> • Post on websites by April 30, 2011 • Distribute via other mechanisms by June 30, 2011 and annually
6. Outreach: Work within the industry to provide outreach by partnering with suppliers	<ul style="list-style-type: none"> • Annually
7. Inspection/Self-Certification: Contact inventoried surface cleaners by mail to request that they complete online training or a self-certification form and obtain business license(s) (see Figure 1) [Required twice during a permit term]	<ul style="list-style-type: none"> • Mailing by May 31, 2011 and May 31, 2013 • Due by June 30, 2011 and June 30, 2012
8. Inspection/Self-Certification: Develop Training Program (see Figure 2)	<ul style="list-style-type: none"> • March 31, 2011
9. Inspection/Self-Certification: Implement Training Program	<ul style="list-style-type: none"> • May 31, 2011
10. Enforcement: Enforce against illicit discharges and other stormwater violations by surface cleaners	<ul style="list-style-type: none"> • As needed
11. Evaluation: Perform effectiveness assessment of pilot program	<ul style="list-style-type: none"> • Annually in conjunction with the Annual Report

Table 6. Implementation Schedule for Mobile Business Pilot Program: Surface Cleaners, by Permit Year

Implementation Strategy Task	2009-2010				2010-2011				2011-2012				2012-2013				2013-2014			
	Q3	Q4	Q1	Q2																
Inventory																				
1. Create regional inventory						X														
2. Maintain and update inventory										X				X					X	
3. Call each business to verify that it is in business and provides surface cleaning services in the Permittees' jurisdiction (for initial inventory and with annual update)								X		X				X					X	
BMP Identification																				
4. Develop Surface Cleaner BMP Fact Sheets						X														
Outreach																				
5. Distribute Surface Cleaner BMP Fact Sheets (websites, other mechanisms)																				
6. Provide outreach by partnering with suppliers																				
Inspection/Self-Certification																				
7. Contact inventoried surface cleaners by mail to request that they complete online training or a self-certification form and obtain business license(s)								X								X				
8. Develop Training Program							X													
9. Implement Training Program																				
Enforcement																				
10. Enforce against illicit discharges and other stormwater violations by surface cleaners (as needed)																				
Evaluation																				
11. Perform effectiveness assessment of pilot program						X				X				X					X	

Notes:

1. Q1 = Jan-March; Q2 = April-June; Q3 = July-Sep; Q4 = Oct-Dec

2. "X" indicates that the task is due during this quarter

☐ = Task will be completed during this timeframe as specified

The San Diego region will address other mobile business categories on a rotating basis—that is, surface cleaners will be targeted during the pilot program, and a different group of mobile businesses will be targeted in subsequent Permit years. The implementation schedule for this approach is included in **Table 7**. This effort may be developed and implemented in collaboration with the Santa Ana Permittees.

Table 7. Implementation Schedule for San Diego Region Program to Address Other Mobile Business Categories on a Rotating Basis

Task	Frequency or Due Date
1. Develop and Implement a Strategy for addressing the following mobile business categories: <ol style="list-style-type: none"> a. Cement mixing or cutting b. Masonry c. Painting and coating 	<ul style="list-style-type: none"> • June 30, 2012
2. Develop and Implement a Strategy for addressing the following mobile business categories: <ol style="list-style-type: none"> a. Mobile automobile or other vehicle washing b. Mobile carpet, drape or furniture cleaning c. Mobile pet services 	<ul style="list-style-type: none"> • June 30, 2013
3. Develop and Implement a Strategy for addressing the following mobile business categories: <ol style="list-style-type: none"> a. Landscaping b. Pest control services c. Pool and fountain cleaning d. Portable sanitary services 	<ul style="list-style-type: none"> • June 30, 2014

Model Surface Cleaner BMP Fact Sheet

BEST MANAGEMENT PRACTICES FOR SURFACE CLEANERS

A surface cleaning business is considered to be any operation that provides the following services:

- Cleaning (e.g., power sweeping, washing) driveways and parking lots
- Cleaning building exteriors (except sand blasting, window cleaning)
- Driveway cleaning (e.g., power sweeping, washing) services
- Parking lot cleaning (e.g., power sweeping, washing) services
- Power washing building exteriors
- Pressure washing (e.g., buildings, decks, fences)
- Steam cleaning building exteriors

Orange County cities and the County of Orange are mandated under municipal National Pollutant Discharge Elimination System (NPDES) permits issued by the California Regional Water Quality Control Boards to prohibit the discharge of pollutants and non-storm water runoff to the storm drain system. Therefore, untreated wastewater (wash water) from surface cleaners shall not be discharged to the street and/or storm drain system.

Best Management Practices

A best management practice (BMP) is a technique, measure, or control that is used for a given set of conditions to improve the quality of runoff in a cost-effective manner.¹ Implementation of these pollution prevention/good housekeeping measures may reduce or eliminate the need to implement other, more costly or complicated procedures. Proper employee training is key to the success of BMP implementation.

Orange County cities, the County of Orange, South Orange County Wastewater Authority, Orange County Sanitation District, and Irvine Ranch Water District have developed the following BMPs for the proper disposal of wastewater generated by surface cleaners. If you have specific questions regarding any of the BMPs herein, please contact the appropriate agencies listed at the end of this document.

General Best Management Practices (BMPs) and Preparation of Work Area

What do I need to do prior to conducting a job?

The BMPs presented below are intended to help you prevent your wastewater from entering the street and/or storm drain system. The following BMPs must be observed by all surface cleaners, regardless of the surface to be cleaned or the type of cleaning operation to be performed:

- Evaluate the chemicals and compounds used for cleaning and reduce or eliminate the use of those that contain solvents, heavy metals, high levels of phosphates, or very high/very low pH.
- Walk through the area where the cleaning will occur prior to the start of the job and identify all area drains, yard drains, and catch basins where wastewater could potentially enter the street or storm drain system.
- Block/seal off identified drains or catch basins using sand bags, plugs, rubber mats, or temporary berms.
- Collect all trash and debris from the area and place in a trash bin for disposal.
- Clean the area of debris prior to cleaning to minimize the amount of suspended solids, soil, and grit in the resulting wastewater.

¹ EPA "Preliminary Data Summary of Urban Stormwater Best Management Practices"

Model Surface Cleaner BMP Fact Sheet

- Identify where surface washing will occur. Avoid washing whole areas; spot clean where feasible and necessary.
- Identify the wastewater disposal option that will be used. Whether you are discharging to landscaping or sanitary sewer, make sure that the requirements will be met and/or the necessary contacts have been made, as discussed below.
- Inventory spill cleanup equipment to ensure that it is available for immediate use, if needed.
- Conduct surface cleaning in accordance with all operating instructions provided by the equipment supplier. Maintain equipment in good working order and routinely check and test all safety features.

What methods can be used to collect wastewater at a site?

There is no specific containment method that must be used for wastewater collection/diversion. However, the system must be adequately designed so that the wastewater does not flow into an on-site or off-site storm drain inlet or into the street. All surface cleaners should use one of the following methods, regardless of the surface to be cleaned or the type of cleaning operation to be performed:

- Portable containment areas can be made from waterproof tarps, heavy-duty plastic, or rubber matting equipped with berms to prevent wastewater from running into on-site or off-site storm drain inlets or into the street. Materials that have been used for berms include sand bags or water-filled tubing. Whatever containment material is used, it must seal tightly to the ground so that none of the wastewater can pass under or over the berms.
- When power washing smaller pieces of equipment, containment devices to use may include portable vinyl swimming pools, plastic 55-gallon drums on casters, and flat metal or plastic containment pads.
- Depending on the volume of wastewater generated, it may be necessary to use a pump system, which may range in size from a wet-dry vacuum to a sump pump. A basin from which to pump wastewater can also be created by establishing a slightly sloped containment area.
- Stationary or more permanent containment areas can be constructed with cement. Berms and pump systems may be used to contain wastewater and divert it to a holding tank.
- Commercial wastewater collection systems are also available for power washing. These systems can range from portable wash pits to self-contained water recycling systems. A list of companies selling this type of equipment can usually be found in the telephone book under "Pressure Washing Services and Equipment".
- Storm drain covers can be made of an impermeable barrier such as a heavy-duty vinyl or plastic secured in place with materials such as concrete blocks, gravel bags, or sand bags. Storm drain covers may also be available through commercial vendors.

Note: Blocking storm drain inlets in the public right-of-way is prohibited as a method of containment, unless expressly permitted by the municipality, typically through an encroachment permit process. Wastewater should be contained on-site prior to entering the public right-of-way. Contact the local municipality for more information.

Model Surface Cleaner BMP Fact Sheet

Wastewater Disposal Options

How can I dispose of my wastewater?

Wastewater generated by surface cleaners is not allowed in the storm drain or street. However, the wastewater may be discharged to a landscaped area, the sanitary sewer, or it may be picked up and disposed of by a waste hauler. Please note that laboratory chemical analysis of wastewater may be required to establish the proper disposal method. A wastewater disposal option should be selected based on the conditions outlined below:

Discharge Wastewater to a Landscaped Area

The wastewater must meet the following requirements if discharging to landscaping:

- The pH must be between 6.5 and 8.5. This can be checked quickly and easily through the use of pH paper test strips.
- The wastewater should not contain large volumes or concentrations of:
 - Toxic materials
 - Degreasers
 - Pollutants that may create a fire or explosion hazard (e.g., gasoline, diesel)
 - Solid or viscous pollutants in amounts sufficient to cause obstruction or blockage of flow
 - Petroleum oil, or other products of mineral oil origin
 - Paint
- Prior to surface washing, you must exercise any reasonable means to eliminate large volumes or concentrations of the above listed pollutants. Common methods to eliminate standing pools of pollutants include the placement of absorbent to adsorb the pollutant, dry-sweeping the absorbent, and disposing of the absorbent properly.
- Wastewater from cleaning food-related vehicles or areas, vehicle exteriors or engines, and buildings with lead- or mercury-based paint should not be discharged to landscaping.
- Filter the wastewater if it contains debris, fibers, or other suspended solids.
- Ensure that the wastewater is fully contained within the landscaped area and will fully infiltrate into the ground prior to leaving the job site.

Sanitary Sewer

If discharging to the sanitary sewer, the following conditions apply:

- The wastewater temperature must be less than 140°F (60°C).
- The pH must be between 6.0 and 12.0. This can be checked quickly and easily through the use of pH paper test strips. Adjust the wastewater to a pH that is between 6.0 and 12.0. Dilution is not an effective or acceptable pretreatment method.
- The wastewater quality must comply with the sanitary sewer facility's local discharge limits and should not contain:
 - Pollutants that may create a fire or explosion hazard (e.g., gasoline, diesel).
 - Solid or viscous pollutants in amounts sufficient to cause obstruction or blockage of flow.
 - Petroleum oil, non-biodegradable cutting oil, or other products of mineral oil origin.
 - Oil based paint.

Model Surface Cleaner BMP Fact Sheet

- No wastewater shall be discharged into any publicly owned manholes that directly or indirectly connect to the sanitary sewer system without express authorization from the appropriate agency.

When discharging to the sanitary sewer:

- Filter the wastewater if it contains debris, fibers, or other suspended solids.
- If chemicals (e.g., solvents or acids) are used during the cleaning process, additional precautions may be needed. Contact your local sanitation district to learn if wastewater containing these chemicals requires pretreatment before discharge to the sanitary sewer or if it needs to be treated as hazardous waste.
- Ensure that the wastewater is released at a flow rate and/or concentration that will not cause problems, pass through, or interference with the sanitary sewer facilities.
- Utilize an approved discharge point such as:
 - Privately owned cleanout (or sink, toilet or floor drain), oil/water separator, or below ground clarifier at the client's property where the wastewater is generated,
 - Privately owned industrial sewer connection at the client's property where the wastewater is generated,
 - Wastehauler station at sanitary sewer facility, and
 - Any other disposal points approved by sanitary sewer facility.
- Maintain a logbook of all discharges.

Waste Hauler

If using a waste hauler, the following types of wastewater may be disposed if it:

- Is corrosive (as indicated by a pH value of less than 5.5) or caustic (as indicated by a pH value of greater than 10.0).
- Contains a pollutant that may create a fire or explosion hazard (e.g., gasoline, diesel).
- Contains solid or viscous pollutants in amounts sufficient to cause obstruction or blockage of flow.
- Contains petroleum oil, non-biodegradable cutting oil, or other products of mineral oil origin.

When using a waste hauler:

- Ensure that the waste hauler is certified by appropriate sanitary sewer and local health care agencies, is Hazardous Waste DOT certified, and complies with applicable discharge regulations, which may include obtaining necessary permits and conducting water quality monitoring requirements.
- Identify the wastes involved and determine if a hazardous waste has been generated. Examples of situations that may potentially generate hazardous wastes include:
 - Power washing old paint off a building. Old paint stripped off commercial buildings may contain metals (e.g., lead, chromium, cadmium, and mercury), causing it to be a regulated hazardous waste. Paint chips cannot be left on the ground at the job site. Paint chips need to be collected, evaluated, and disposed of properly.
 - The use of certain solvents as degreasing agents, which may cause the wastewater to be classified as a listed or characteristic hazardous waste.
- Maintain a logbook of all discharges and hazardous waste manifests, if applicable.

For additional information contact:

<Insert Agency, Address, Telephone Number, and Website>

Attachment B. Summary of Other Stormwater Program Approaches for Mobile Businesses

This appendix includes information for the following agencies:

- Fort Worth, Texas
- Las Vegas, Nevada
- San Diego, California

FORT WORTH, TEXAS

Contact Information

Agency: City of Fort Worth, Texas

Program Name: Industrial Program

Contact Names: Derek Senter; TC Michael

Phone: (817) 392-5454; (817) 392-5455

Web site: http://www.fortworthgov.org/dem/info/default.aspx?id=2946&ekmense1=5f897662_1792_0_btnlink

Permit Requirements

The General Permit TXR040000 for Phase II (Small) MS4s¹ requires the City of Fort Worth (City) to develop and implement a public education program to distribute educational materials to commercial and industrial facilities. In addition, specific types of industrial facilities are subject to the Multi-Sector General Permit.² Facilities are tracked by SIC code.³

Program Overview

The following mobile business types are targeted by program:

- Equipment washing/cleaning
- [f] Mobile automobile or other vehicle washing/Mobile auto washing/detailing
- [i] Pest control services
- [k] Mobile carpet, drape or furniture cleaning/Carpet, drape and furniture cleaning
- [l] Cement mixing or cutting
- [m] Masonry
- [n] Painting and coating
- [p] Landscaping
- [t] Pool and fountain cleaning
- [v] Portable sanitary services
- [y] Mobile pet services
- [z] Power washing services/Mobile high pressure or steam cleaning

Program includes the following components:

- | | | |
|---|--|--|
| <input checked="" type="checkbox"/> Business Inventory | <input checked="" type="checkbox"/> BMP Identification | <input type="checkbox"/> Outreach/Training |
| <input type="checkbox"/> Inspections/Self-Certification | <input checked="" type="checkbox"/> Enforcement | <input checked="" type="checkbox"/> Other |

¹ http://www.tceq.state.tx.us/permitting/water_quality/stormwater/WQ_ms4_small_TXR04.html

² http://www.tceq.state.tx.us/permitting/water_quality/stormwater/TXR05_sw_associated_definition.html

³ <http://www.tceq.state.tx.us/assets/public/permitting/waterquality/attachments/stormwater/lookupsector.pdf>

Additional Information on Specific Components

Business Inventory

Businesses are tracked using the permit system and spot inspections in the field. Spot inspections include incidental meetings with mobile power washers (i.e., driving by and noticing mobile washing equipment) and verification that the business has a valid permit and that its equipment has a valid registration certificate.

BMP Identification

The program has identified BMPs for power washing operations and proper disposal wash water methods and listed them on the Fact Sheet for Power Washers, available on the City of Fort Worth web site.⁴

Enforcement

Investigations of power washers occur in response to water quality complaints. During the investigation, a citation is immediately issued if the business is found to be operating without a permit. The City can charge a fine of up to \$2,000 per day per offense if a person introduces or causes to be introduced any discharge to the storm drain system that is not composed entirely of stormwater.

Other

This program requires power washers to obtain a permit (\$25) for their business (valid for one year from date of issuance) and one registration certificate (\$25) per wash unit. The registration for each wash unit is used to further ensure that the mobile business is being tracked. The registration certificate also provides a convenient mechanism to check if a business has registered both its business and wash units. The documents must be displayed in a visible location on the trucks. Inspectors driving past a power washer conducting business will check the truck for a valid, visible permit.

Summary of Major Differences from Orange County Approach

The primary differences between this program and the proposed Orange County pilot program are:

- A mobile business program is not explicitly required by the permits.
- BMPs for power washing operations and wash water disposal have been identified, but they are only provided via the City's web site.
- Business permits and registration certificates are required for all power washing businesses. The power washer, when applying for a business permit, must also apply for the registration certificates for each of their wash units. Businesses that are cited for not having a business permit are required to obtain one.

⁴ http://www.fortworthgov.org/dem/info/default.aspx?id=8260&ekmense1=5f897662_1792_4890_8260_3

LAS VEGAS, NEVADA

Contact information

Agency: Las Vegas Stormwater Quality Management Committee (Multiple agencies)

Program Name: Industrial and Construction Program

Names: Kevin Eubanks, PE/CFM, Assistant General Manager, Clark County Regional Flood Control District; Chang Shih, City of Las Vegas, Industrial & Construction Program

Phone: (702) 685-0000 / (702)229-2338

Web site: <http://www.lvstormwater.com/>

Permit Requirements

The municipal separate storm sewer system permit for Clark County and other permittees⁵ does not specifically require the permittees to regulate mobile businesses; however, the permittees must identify and regulate any industry that has the potential to measurably impact the water quality of the receiving waters. The Clark County Regional Flood Control District constitutes the planning portion of the Las Vegas Stormwater Quality Management Committee (Committee). It is a lead co-permittee because it has a stable funding source (1/4 cent sales tax). It does not directly own any stormwater outlets or have any discharges. The Committee has taken proactive steps to identify mobile businesses of concern. It developed BMPs for these businesses, and these are available online. Currently, resources cannot support a comprehensive mobile business program.

Program Overview

The following mobile business types are targeted by program:

- Equipment washing/cleaning
- [f] Mobile automobile or other vehicle washing/Mobile auto washing/detailing
- [i] Pest control services
- [k] Mobile carpet, drape or furniture cleaning/Carpet, drape and furniture cleaning
- [l] Cement mixing or cutting
- [m] Masonry
- [n] Painting and coating
- [p] Landscaping
- [t] Pool and fountain cleaning
- [v] Portable sanitary services
- [y] Mobile pet services
- [z] Power washing services/Mobile high pressure or steam cleaning

⁵ http://acequia.ccrfcd.org/pdf_arch1/NPDES/Clark%20County%20MS4%20Permit%202010-2015.pdf

Program includes the following components:

- | | | |
|---|--|--|
| <input type="checkbox"/> Business Inventory | <input checked="" type="checkbox"/> BMP Identification | <input type="checkbox"/> Outreach/Training |
| <input type="checkbox"/> Inspections/Self-Certification | <input checked="" type="checkbox"/> Enforcement | <input type="checkbox"/> Other |

Additional Information on Specific Components

BMP Identification

BMPs for the following mobile business types have been identified and are available on the Committee's web site:

- Mobile Auto Detailing⁶
- Carpet Cleaning⁷
- Pool Draining⁸
- Surface Cleaning⁹

Enforcement

Local ordinances prohibit the discharge of pollutants to the storm drain system. Any businesses identified, by any municipal staff or citizen, to be in violation of this prohibition is investigated by the responsible co-permittee in that jurisdiction. No regular inspections are in place.

When a complaint is received, the responsible permittee investigates the complaint like any other water quality complaint. The City of Las Vegas has had problems tracking down these complaints because the mobile businesses are often no longer present when investigators arrive at the problem site. NOV's are issued immediately whenever an illicit discharge is found. Fines can be levied if the mobile business continues to be out of compliance.

Summary of Major Differences from Orange County Approach

The primary differences between this program and the proposed Orange County pilot program are:

- A mobile business program is not required by the permit.
- BMPs for a few mobile business types have been identified, but they are only provided via the Committee's web site.

⁶ http://www.lvstormwater.com/bmps_autocare.htm

⁷ http://www.lvstormwater.com/bmps_miscellaneous.htm

⁸ http://www.lvstormwater.com/bmps_miscellaneous.htm

⁹ http://www.lvstormwater.com/bmps_surfacecleaning.htm

SAN DIEGO, CALIFORNIA

Contact information

Agency: County of San Diego, California

Program Name: Industrial Program

Name: Richard Diaz , Compliance Department

Phone: (858) 495-5298

Web site: <http://www.co.san-diego.ca.us/dpw/watersheds.html>

Permit Requirements

The municipal separate storm sewer system permit for the County of San Diego and other permittees¹⁰ requires the permittees to develop and implement a program to reduce the discharge of pollutants from mobile businesses to the maximum extent practicable (p. 39-40 of permit).

Program Overview

The following mobile business types are required to be targeted by program (p. 36 of permit):

- [Equipment washing/cleaning](#)
- [f] Mobile automobile or other vehicle washing/[Mobile auto washing/detailing](#)
- [i] Pest control services
- [k] Mobile carpet, drape or furniture cleaning/[Carpet, drape and furniture cleaning](#)
- [l] Cement mixing or cutting
- [m] Masonry
- [n] Painting and coating
- [p] Landscaping
- [t] Pool and fountain cleaning
- [v] Portable sanitary services
- [y] Mobile pet services
- [z] Power washing services/[Mobile high pressure or steam cleaning](#)

Program includes the following components:

- | | | |
|--|--|---|
| <input checked="" type="checkbox"/> Business Inventory | <input checked="" type="checkbox"/> BMP Identification | <input checked="" type="checkbox"/> Outreach/Training |
| <input checked="" type="checkbox"/> Inspections/Self-Certification | <input checked="" type="checkbox"/> Enforcement | <input type="checkbox"/> Other |

Additional Information on Specific Components

Business Inventory

The County worked with its co-permittees in developing a web-based inventory database. Each co-permittee may search within its own region as well as that of its co-permittees. Changes can be made only with log-in information identified as originating from that region (i.e., the County

¹⁰ http://www.swrcb.ca.gov/water_issues/programs/stormwater/docs/phase1r9_2007_0001.pdf

can only edit entries for businesses located in the County). Because the businesses are mobile, the database includes a field to identify their service area. When a violation occurs in one jurisdiction, that permittee notifies all other co-permittees. Businesses are sorted by the city in which they are “headquartered”. Note that the County does not have any business licenses, nor does it require mobile businesses to have them within their jurisdiction.

BMP Identification

The County and its co-permittees developed all of the pertinent BMPs via the Mobile Business Workgroup. The BMPs for the mobile businesses listed above can be found on the County’s web site.¹¹

Outreach/Training

BMPs are sent directly to each mobile business in the inventory using first-class mail. If the mailing is not returned to the County, it is assumed that the business has been notified and “trained”.

Inspections/Self-Certification

Only large, commercial mobile business companies (e.g., Stanley Steemer Carpet Cleaning) are inspected. Inspectors conduct surprise inspections at the business headquarters. They check for on-the-job BMPs and review their training program. Anything in writing to prove that their employees are trained in the BMPs are inspected and noted.

Enforcement

Mobile business complaints are investigated in the same manner as any other water quality complaint. Complaints also help identify particular businesses to add to the business inventory.

Enforcement actions are taken in response to complaints or infractions noted during a commercial inspection. Enforcement occurs in the field for mobile businesses because they often lack a primary business address; thus, the County believes that they may only have one chance to cite a particular business. Administrative citations are the highest form of enforcement used for mobile businesses. The County actively shares any violations or complaints with the other co-permittees.

Summary of Major Differences from Orange County Approach

The primary differences between this program and the proposed Orange County pilot program are:

- BMPs are available on the County’s web site; they are also mailed directly to all inventoried mobile businesses. No response is required, and no further training is suggested.
- Inspections of mobile businesses are conducted only for large companies.

¹¹ <http://www.co.san-diego.ca.us/dpw/watersheds.html>