

Countywide Strategy for Control of

Mobile Sources:

Meeting MRP Provision C.5.e Requirements

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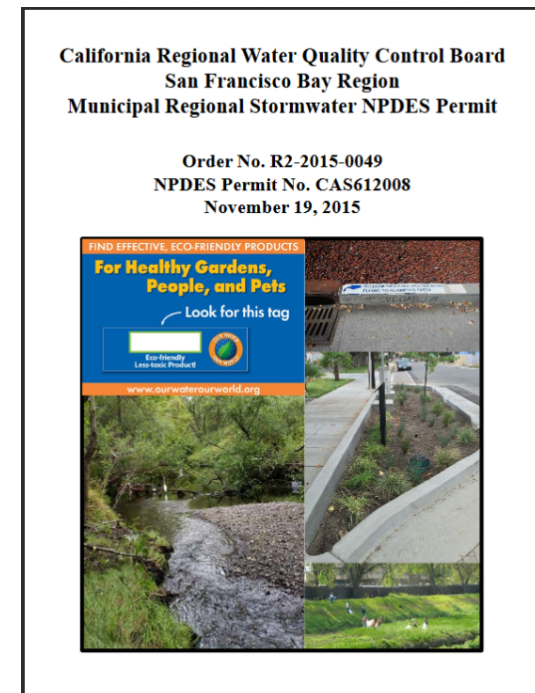
Outline



- Regulatory Overview
- BMPs
- Inventory
- Inspections
- Enforcement Strategy
- Outreach

Municipal Regional Permit (MRP)

- Regional permit regulating municipal stormwater systems
- Applies to 76 cities, counties and districts in Bay Area
- First adopted by Regional Water Board October 2009
- Permit renewed every 5 years
- Reissued permit effective January 1, 2016



Permit Provisions

- **C2** – Municipal Operations
- **C3** – New Development and Redevelopment
- **C4** – Industrial and Commercial Site Controls
- **C5** – Illicit Discharge Detection and Elimination
- **C6** – Construction Inspection
- **C7** – Public Information and Outreach
- **C8** – Water Quality Monitoring
- **C9** – Pesticide Toxicity Control
- **C10** – Trash Load Reduction
- **C11** – Mercury Controls
- **C12** – PCBs Controls
- **C13** – Copper Controls
- **C14** – Bacteria Controls
- **C15** – Exempted & Conditionally Exempted Discharges

MRP C.5.e

- Control of Mobile Sources
- Associated with Illicit Discharge Detection and Elimination (IDDE) Programs
- Similar requirements in previous permit
 - More reporting requirements



MRP C.5.e

- Types of Mobile Businesses
 - Automobile Washing - MRP
 - Power Washing - MRP
 - Steam Cleaning - MRP
 - Carpet Cleaning - MRP
 - Pet Care Providers – added by IND/IDDE AHTG
 - Others




Best Management Practices (BMPs)

- **MRP Requirement** – implement BMPs
- IND/IDDE AHTG developed BMP tri-fold brochure (May 2012)

MOBILE BUSINESSES

Best Management Practices



This brochure provides information about using Best Management Practices (BMPs) to prevent polluted water from entering storm drain system

Who should use this brochure?

- Automobile Washers or Detailers
- Power Washers
- Carpet Cleaners
- Steam Cleaners
- Pet Care Services

Why should we be concerned with wash water disposal?

Wash water from mobile cleaning is NOT just dirt and water. It also may contain soaps, toxic chemicals, heavy metals, oil and grease that are harmful to our creeks and waterways.



Pollutants draining from mobile cleaning activities are washed into the street and into the storm drain system which then flows to our creeks and Bay without any cleaning or filtering.

Federal, State and local regulations **prohibit discharge of anything but rain water in the storm drain.**

Implementing the proper Best Management Practices (BMPs) is easy and is required for compliance with State and local stormwater pollution prevention regulations.

What about biodegradable and non-toxic cleaning products?

Cleaning products labeled "nontoxic" and "biodegradable" can still harm wildlife if they enter a storm drain system. Fish, for example, are affected by **both** regular soap and biodegradable soap! However, if disposed of in the sanitary sewer system, wastewater treatment plants prefer biodegradable products over toxic cleaners.

Plan Ahead

- ❑ Determine where you will discharge wastewater before starting a new job.
- ❑ Be sure to have equipment on hand (i.e. long hoses, sump pump, etc) for directing discharge to sanitary sewer access points. Ensure hoses are long enough to reach access points that are far from your holding tank.

Contact your local hardware or construction material stores for available tools and materials for mobile businesses including vacuum pumps, mats, sand or gravel bags, wattles, etc


Options for Wash Water Disposal

Never drain wash water into streets, gutters, parking lots, or storm drains.

- ❑ Wash water can usually be discharged to the sanitary sewer through a drain the property owner's home or business, such as a utility sink, floor drain, mop sink or toilet. Take precautions to prevent debris, hazardous materials or anything that can clog from entering sinks, toilets or sanitary drain.
- ❑ Direct wash water to landscaping or gravel surfaces. Wash water must completely soak into vegetation before you leave the site.

Doing the Job Right Checklist of BMPs

- ❑ Walk the area to identify storm drains.
- ❑ Sweep the wash area to remove debris.
- ❑ If feasible, wash on a vegetated or gravel surface where wash water can infiltrate into the ground without runoff.
- ❑ Contain wash area so that water does not drain down streets and gutters—use sand bag berms, wattles, or bermed mats.
- ❑ Block or seal off any storm drain inlets and sloping areas that release water to the storm gutter to prevent wash water from entering the storm drain.
- ❑ Put storm drain protection in place before starting the washing process and remove before you leave the site.
- ❑ Vacuum or shake floor mats into a trashcan.
- ❑ Minimize water use; use nozzles on hoses.
- ❑ Use less-toxic cleaning products (wash without soaps and solvents, if possible)
- ❑ Use a "wet-vac" to vacuum up the contained wash water for proper disposal.
- ❑ Remove all debris or sediment accumulated during the washing activities.



Three Steps to Remember Before You Clean

1. **Be a BASMAA Recognized Mobile Cleaner** – Take the online "mobile surface cleaning" training from BASMAA (Bay Area Stormwater Management Agencies Association). This program will train you on how to clean different surfaces in an environmentally acceptable way and publish your name as a trained cleaner. Visit www.basmaa.org.
2. **Ask Your Local Inspector**
Contact your local City stormwater inspector to determine specific discharge requirements. Obtain permission to discharge to the property owner's sanitary sewer plumbing or landscaping before starting the job.
3. **Divert and Collect Wash Water**
Cover the storm drains to prevent wash water from entering and divert wash water to the sanitary sewer system if permitted to do so. Small amounts may be diverted to landscaped areas, if appropriate.

Local Pollution Control Agencies


San Jose/Santa Clara Water Pollution Control Plant.
(408) 945-3000
Serving Campbell, Cupertino, Los Gatos, Milpitas, Monte Sereno, San Jose, Santa Clara, Saratoga

City of Sunnyvale Environmental Services Department
(408) 730-7270

Regional Water Quality Control Plant (650) 329-2598
Serving East Palo Alto Sanitary District, Los Altos, Los Altos Hills, Mountain View, Palo Alto, Stanford

Protect the Bay and Yourself!


When wash water flows into storm drains it goes straight to local creeks and the Bay without any cleaning or filtering.



If you discharge wash water generated by mobile cleaning activities to the storm drain, **you are violating municipal stormwater ordinances and may be subject to a fine.**

For More Information About Stormwater Pollution Prevention

www.myWatershedWatch.org



Mobile Business BMPs



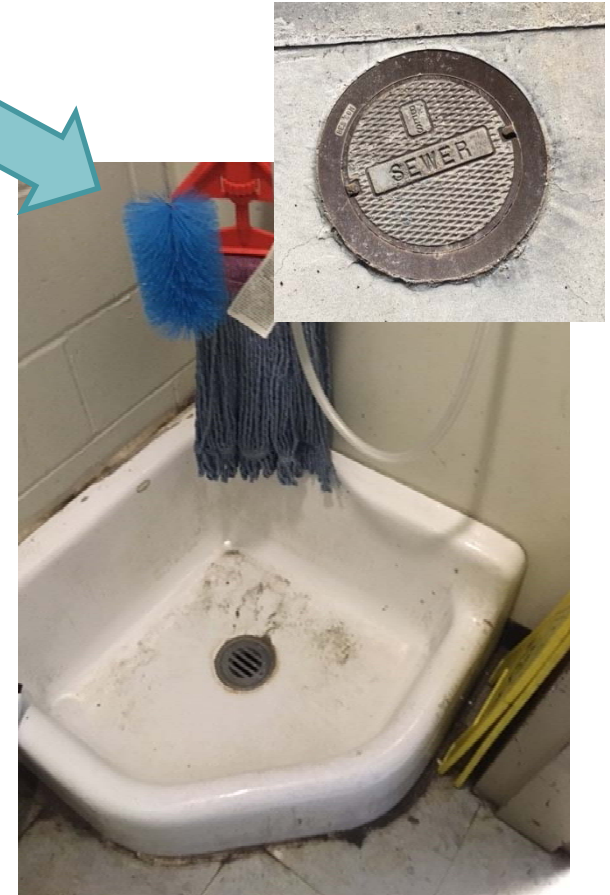
Mobile Business BMPs

- Plan Ahead
 - Determine where you will discharge
 - Have equipment on hand
- Divert and Collect Wash Water
 - Walk the area to identify storm drains
 - Sweep area to remove debris
 - Contain wash area
 - Cover storm drains
 - Divert to sanitary sewer at property owner
 - Direct to landscaping



Mobile Business BMPs

- Discharge Properly to Sanitary Sewer
 - Cleanout, mop sink, toilet or other drain
 - Never into a street, gutter or storm drain
- Prevent from discharging to sanitary sewer
 - Debris
 - Hazardous materials
 - Anything that can clog
- Ask Local Inspector for specific discharge requirements

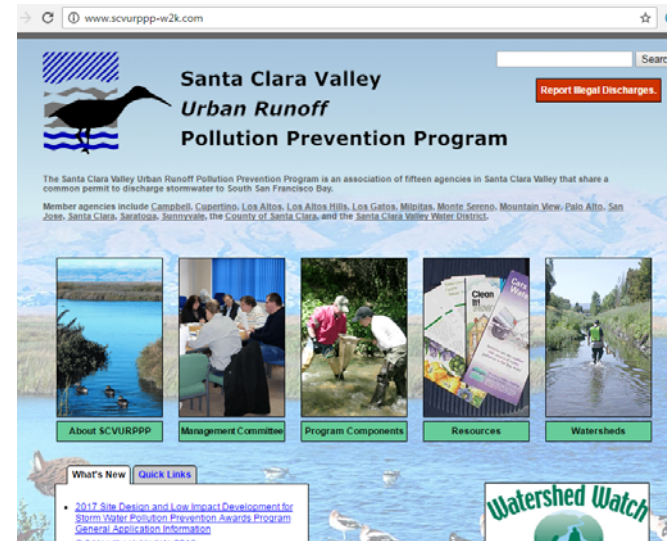


Inventory

- **MRP Requirement** - regularly update mobile business inventory
- Santa Clara County Regional Inventory
 - Compiled business lists in 2013 from
 - Palo Alto
 - Sunnyvale
 - San Jose
 - Mountain View
 - Santa Clara

Inventory

- Updates
 - Cities continue to send new businesses to AHTG
 - Inspectors note businesses while in the field (*check with your supervisor*)
 - Enforcement Actions
 - AHTG discuss updates
- Inventory available on SCVURPPP members only website



Inspections

- **MRP Requirement** – inspections as needed
- Complaint driven inspections (reactive)
- Track in Spill and Discharge Complaint Tracking System (C.5.d.ii)
 - SCVURPPP Template
- Report inspections separately from Spill/Discharge numbers in Annual Report

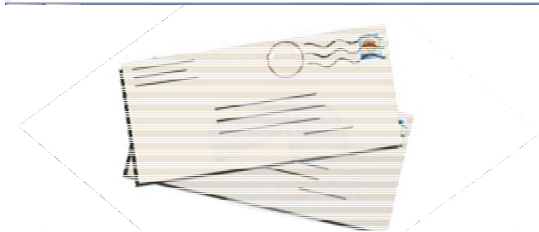
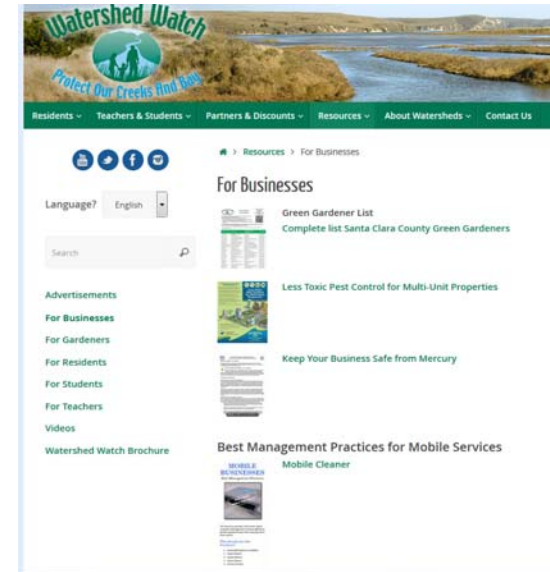


Enforcement Strategy

- **MRP Requirement** – implement enforcement strategy that specifically addresses unique characteristics
- Issue Enforcement Actions
 - According to IDDE Enforcement Response Plan (ERP)
- How to track enforcement across jurisdictions?
 - Share enforcement actions at IND/IDDE AHTG Meetings

Outreach Strategy

- **MRP Requirement** – implement outreach and education strategy
- **Countywide Activities**
 - BMP brochure available on website
 - <http://www.mywatershedwatch.org/>
 - Mail/Email Tip Sheets to Regional Inventory
 - Outreach messages on social media – work with WEO AHTG
- **Agency Activities**
 - Distribute BMP brochure



Annual Reporting

- 2017 & 2019 Annual Reports
 - BMPs for types of mobile businesses (2017) & changes and BMPs developed for additional types of mobile businesses (2019)
 - Enforcement strategy
 - List outreach events and education
 - Number of inspections FY16/17 (2017) & discussion of inspections (2019)

Annual Reporting

- 2017 & 2019 Annual Reports
 - Discuss enforcement actions taken FY16/17 (2017) & during permit term (2019)
 - Inventory
 - List of countywide/regional activities (2017 only)



Inspector Responsibility

- Respond to mobile business complaint
 - Follow IDDE ERP
 - Complete IDDE inspection form
 - Refer to County DA
- Distribute BMP Brochures
- See mobile cleaner businesses in your jurisdiction
 - Ask Supervisor for agency specific procedure
 - Collect contact information
 - Provide to IND/IDDE AHTG for inventory

Questions?

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