



<i>Environmental Guideline</i> Cleaning/Washing Indoor Industrial Surfaces	
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<i>Controlled Copy Location:</i>	Not applicable.

Activity Description
The cleaning and washing of indoor industrial surfaces (e.g., floors, walls, etc.) in places such as maintenance areas, etc., and management of materials associated with the activity including storage, handling and disposal.

Potential Environmental Risks
The following environmental concerns are associated with this activity: <ul style="list-style-type: none"> • Improper or inappropriate disposal of cleaning / washing fluids. • Improper or inappropriate discharge of contaminants in washing / cleaning fluids.
Potential consequences from performing the activity incorrectly: <ul style="list-style-type: none"> • Property damage, personal injury, damage to the environment. • Possible regulatory non-compliance, Notice of Violation and related [financial & non-financial] penalties.

Critical Operating Requirements
A. General Requirements
Prohibited Activities <ul style="list-style-type: none"> • Discharge of cleaning / washing water from indoor industrial surfaces to the stormwater system is prohibited. These discharges must go to the sanitary sewer, typically after going through a pretreatment device, and must be authorized by the local wastewater treatment receiving facility. • Do not wash any materials into any drain without first removing solids (such as paper) and clean up spills of chemicals and excess grease/oils/etc. (using absorbent spill collection media). While the sanitary sewer drains typically discharge to a wastewater pretreatment device, avoid discharges of chemicals and excessive solids, oils, and grease, etc. to this system. (Not all pretreatment systems are intended to collect these types of contaminants and they may bypass pretreatment systems).
General Considerations <ul style="list-style-type: none"> • Each operator and tenant conducting cleaning/washing activities is responsible for understanding the applicable regulations and managing their activities accordingly; this Environmental Guideline is meant as guidance only and does not supersede any regulations. • Ensure that Material Safety Data Sheets (MSDSs) are available for all chemicals used during the cleaning activities. MSDSs for materials no longer in use should be routinely removed and placed in an archive.

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Ensure proper disposal of materials generated.

Critical Operating Requirements

<u>A. General Requirements</u>	
Training Requirements	
<ul style="list-style-type: none"> All employees engaged in cleaning activities must be aware of the proper techniques, requirements and pollution prevention aspects of washing/cleaning of indoor industrial areas. 	
Storage & Material Handling Requirements	
<ul style="list-style-type: none"> Maintain legible labels and markings on all containers and tanks. Store chemicals and other cleaning products in containers in good condition and utilize secondary containment when appropriate. See the following environmental guideline: <ul style="list-style-type: none"> CCD-301.03.10 General Regulated Waste Management 	

<u>B. Planning Requirements</u>	<i>Responsible: Operator</i>
B1. Use only cleaning solutions that comply with Metro Wastewater Reclamation District and Denver Wastewater requirements.	
B2. Maintain adequate supplies of spill response equipment and materials in locations where spills are likely to occur.	
B3. A dry method of cleaning floors is preferred (e.g. vacuuming or sweeping) and should always be used prior to any wet methods.	
B4. Confirm that the drains connect to the sanitary sewer system prior to allowing the discharge.	
B5. Fluids generated in the cleaning and washing of indoor industrial surfaces should drain into a pretreatment device (such as an oil/water separator and/or sand filter), or be collected for transfer to a pretreatment device, prior to discharge to the sanitary sewer system.	
B6. Good housekeeping procedures should be followed to keep the washing area clean and free of debris.	
B7. Prior to ordering products, check with Purchasing to order from an Environmentally Preferred Purchasing product list.	

<u>C. Critical Tasks</u>	<i>Responsible: Operator</i>
C1. Use granular absorbents to remove bulk liquid materials from floor prior to cleaning. Remove all other residue using vacuum or sweeping methods before cleaning with liquids.	
C2. Check product caution labels for special instructions.	
C3. Tightly cap all containers when finished with cleaning.	
C4. Use products sparingly.	

<u>D. Emergency Response</u>	<i>Responsible: Operator</i>
D1. If a spill occurs, refer to Environmental Guideline Spill Response. <ul style="list-style-type: none"> Call 311 immediately (during normal business hours) or at 303-206-0001 after normal business hours for all spills. 	
D2. Control spills to minimize property damage and eliminate imminent risk to human health and the environment.	
D3. Prevent spills from entering floor drains.	

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D. Emergency Response	<i>Responsible: Operator</i>
D4. Do not wash or flush spills into any sewer or waterway, or onto any soils.	
D5. Containerize all collected wastes and evaluate for labeling, storage and disposal.	

E. Inspection & Maintenance Requirements	<i>Responsible: Operator</i>
E1. Pretreatment devices and sumps should be included in a routine inspection and maintenance program.	

Expected Records / Outputs	
<u>Record / Output</u>	<u>Instructions</u>
MSDSs for cleaning products	<ul style="list-style-type: none"> Manufacturers of products will supply these documents on demand. MSDSs for all products should be made available to all employees engaged in cleaning activities and maintained on file by the Operator at the facility.
Waste disposal records (profiles, LDR forms, manifests, sample results, etc.).	<ul style="list-style-type: none"> DEH EQ Facility Compliance Program staff will manage all regulated waste disposal activities at City facilities Manifests, LDRs & profile forms will be managed and maintained by DEH EQ Facility Compliance Program. Maintain waste management records for a minimum of 3 years
Evidence of training	<ul style="list-style-type: none"> While formal certifications are not always necessary, some form of "proof of training" (such as sign-in sheets and handouts) is expected and should be maintained on file by the operator.

References	
<u>Phone Numbers</u>	
<ul style="list-style-type: none"> DEH EQ (for Spill Reporting during normal business hours).....3-1-1 DEH EQ (for Spill Reporting after normal business hours) (303) 206-0001 Gary Lasswell (DEH DEQ Env. Compliance & Mgmt. Supervisor) (720) 865-5440 Paul Bedard (DEH DEQ Facility Compliance Program Admin.) (720) 865-5473 	

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References

Guidance Materials (list not limited to the following)

- MSDSs
- CCD Municipal Separate Storm Sewer (MS4) Colorado Discharge Permit System (CDPS) Permit No. COS-000001

Training Materials (list not limited to the following)

- Operating procedures training (On-the-Job)

Related Environmental Guidelines (list not limited to the following)

- CCD-301.03.10 General Regulated Waste Management
- CCD-301.03.26 Spill Response
- CCD-301.03.28 Management of Universal Wastes

Applicable Regulations (list not limited to the following)

- 6 CCR 1007-3, Part 261 State RCRA Regulations
- Denver Wastewater Management Division Rules & Regulations
- Metro Wastewater Reclamation District Rules & Regulations

Other Documents

- Compliance Bulletins