



<i>Environmental Guideline</i> <b>Maintenance – Janitorial</b>	
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<b>Activity Description</b>
The activity of non-industrial cleaning of building interiors, including the use of cleaning chemicals, washing, vacuuming, waste collection and disposal/recycling.

<b>Potential Environmental Risks</b>
The following environmental concerns are associated with this activity:
<ul style="list-style-type: none"> <li>• Air pollution &amp; odors</li> <li>• Improper or inappropriate disposal of cleaning and other janitorial wastes</li> <li>• Inappropriate storage of chemicals</li> <li>• Spills of cleaning solutions</li> <li>• Wastewater discharges</li> </ul>
Potential consequences from performing the activity incorrectly:
<ul style="list-style-type: none"> <li>• Property damage, personal injury, damage to the environment.</li> <li>• Possible regulatory non-compliance, Notice of Violation and related [financial &amp; non-financial] penalties.</li> </ul>

<b>Critical Operating Requirements</b>
<b>A. General Requirements</b>
<p><b>Prohibited Activities</b></p> <ul style="list-style-type: none"> <li>• Discharge of the following materials down any drain is prohibited:             <ul style="list-style-type: none"> <li>○ Any fuels, oils or grease</li> <li>○ Any pesticides, insecticides or herbicides</li> <li>○ Solvents and un-used chemical products</li> <li>○ Generally prohibited discharges and deleterious wastes as specified by Metro Wastewater Reclamation District &amp; Wastewater Management Division</li> </ul> </li> <li>• Disposal of aerosol cans requires special management procedures. These items must not be disposed of in the trash. See Environmental Guideline for Management of Universal Wastes.</li> <li>• Disposal of fluorescent and compact fluorescent light bulbs, and other light bulbs that contain mercury (HID lamps, etc.) requires special management procedures. These items must not be disposed of in the trash. See Environmental Guideline for Management of Universal Wastes.</li> </ul>
<p><b>General Considerations</b></p> <ul style="list-style-type: none"> <li>• Each operator conducting janitorial activities is responsible for understanding the applicable regulations and managing his activities accordingly; this Environmental Guideline is meant as guidance only and does not supersede any laws or regulations.</li> </ul>

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- Always read the label and specification sheets for all chemical products and equipment before use if you are not thoroughly familiar and experienced with the product or equipment.
- Always read and make sure you understand the Material Safety Data Sheets (MSDS) for all chemical products which are new to your use and cleaning processes.
- Save and file all MSDSs. Ensure that Material Safety Data Sheets (MSDSs) are available for all janitorial chemicals used at a facility. MSDSs for materials no longer in use should be routinely removed and placed in an archive storage file.

### **Critical Operating Requirements**

#### **A. General Requirements**

##### **Training Requirements**

- All employees engaged in janitorial activities must be trained in the proper techniques, requirements and pollution prevention related activities.

##### **Storage & Material Handling Requirements**

- Maintain legible labels and markings on all containers and tanks.
- See the following environmental guidelines:
  - General Regulated Waste Management
  - Hazardous Materials Use and Storage

#### **B. Planning Requirements**

*Responsible: Janitorial Manager*

- B1. Ensure that janitorial carts and/or closets are stocked with appropriate spill response materials at all times. Carts containing chemicals should not be left unattended or made accessible to the public during the cleaning process.
- B2. Prior to ordering products, check with your purchasing agent and Greenprint Denver to select Environmentally Preferred Products and avoid products containing prohibited chemicals.
- B3. Have appropriate Personal Protective Equipment (PPE) on hand prior to engaging in janitorial activities.

#### **C. Critical Tasks**

*Responsible: Janitorial Manager*

- C1. Check caution labels for special instructions.
- C2. Tightly cap all containers when finished with cleaning.
- C3. Use Personal Protective Equipment (PPE) when appropriate.
- C4. Use products sparingly.

#### **D. Emergency Response**

*Responsible: Janitorial Manager*

- D1. If a spill occurs, refer to Environmental Guideline Spill Response.
  - **Call DEH immediately at 720-865-5452 (during normal business hours) or (303)206-0001 (after normal business hours) to report all spills.**
- D2. Control spills to minimize property damage and eliminate imminent risk to human health and the environment.
- D3. Prevent spills from entering interior building floor drains.

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

<u>E. Inspection &amp; Maintenance Requirements</u>	<i>Responsible: Janitorial Manager</i>
E1. Periodical assessment of conformance with this environmental guideline is recommended using the inspection sheet at the end of this document.	

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<b>Expected Records / Outputs</b>	
<u>Record / Output</u>	<u>Instructions</u>
MSDSs for Janitorial products	<ul style="list-style-type: none"> <li>Manufacturers of products will supply these documents on demand. MSDSs for all products should be made available to all employees engaged in janitorial activities and maintained on file by the Operator at the facility.</li> <li>DEH EQ Facility Compliance Program staff will manage all regulated waste disposal activities at City facilities</li> <li>Manifests, LDRs &amp; profile forms will be managed and maintained by DEH</li> <li>Maintain waste management records for a minimum of 3 years</li> </ul>
Waste disposal records (profiles, LDR forms, manifests, sample results, etc.).	
Evidence of training	

<b>References</b>
<p><u>Phone Numbers</u></p> <ul style="list-style-type: none"> <li><b>311 (for Spill Reporting during normal business hours).....3-1-1</b></li> <li>DEH DEQ Emergency Response (after normal business hours)..... (303) 206-0001</li> <li>Paul Bedard (DEH EQ Facility Compliance Program Admin.) ..... (720) 865-5473</li> </ul> <p><u>Guidance Materials (list not limited to the following)</u></p> <ul style="list-style-type: none"> <li>MSDSs</li> <li>WMD MS4 Permit</li> </ul> <p><u>Training Materials (list not limited to the following)</u></p> <ul style="list-style-type: none"> <li>Operating procedures training (On-the-Job)</li> </ul> <p><u>Related Environmental Guidelines (list not limited to the following)</u></p> <ul style="list-style-type: none"> <li>Environmentally Preferable Purchasing</li> <li>Management of Universal Wastes</li> <li>Spill Response</li> <li>General Regulated Waste Management</li> </ul> <p><u>Applicable Regulations (list not limited to the following)</u></p> <ul style="list-style-type: none"> <li>6 CCR 1007-3, Part 261 State RCRA Regulations</li> <li>Denver Wastewater Management Division Rules &amp; Regulations</li> <li>Metro Wastewater Reclamation District Rules &amp; Regulations</li> </ul> <p><u>Other Documents</u></p> <ul style="list-style-type: none"> <li>DEH Compliance Bulletins</li> <li>CDPHE Compliance Bulletins</li> </ul>

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