



Cleaning Up the Carwash Industry

Empowering Workers and Protecting Communities

A Report by the Carwash Workers Organizing
Committee of the United Steelworkers

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Executive Summary

The thousands of workers who shampoo, wax, dry, and detail cars are some of the most exploited workers in Los Angeles. They frequently work in appalling conditions for low or, in many instances, no wages. Too often, carwash owners flout labor laws, health and safety regulations, and environmental protections in their single-minded drive for profits. Their practices put workers, customers, and even the general public at risk.

In 2002, California carwash owners reported \$872 million in revenue, and Los Angeles County owners reported more than one-third of the state's total revenue, or \$251 million. Unfortunately, the prosperity of carwash owners has not translated into a decent living for carwash workers. Although the minimum wage in California is \$8 per hour, many carwash owners pay their workers by the day at rates far below the legal minimum.



In addition to paying wages that are illegally low, Los Angeles carwash owners often deny their workers the most basic workplace rights and protections required by law. Analysis of case files of the California Occupational Health and Safety Administration (Cal/OSHA) reveal numerous citations of carwash owners in Los Angeles. Working at a carwash can be difficult and even dangerous, especially during the hot summer months when temperatures

in Los Angeles approach 100 degrees. Workers are frequently forced to work without safety equipment, training on how to deal with hazards and chemical exposures in their workplaces, clean drinking water, breaks for rest and meals, minimum wages, overtime pay, health insurance, or respect and dignity on the job.

Professional carwashes can have an adverse impact on the environment if not properly managed. The Department of Public Works has cited Los Angeles carwash owners for violating environmental regulations, and carwash workers report that wastewater runoff, which can contain highly toxic chemicals, sometimes leaks into storm drains. Carwash owners who violate environmental laws are endangering our local rivers, oceans, and groundwater.

Right now in Los Angeles, some carwash owners are accumulating large profits by cheating workers and polluting our environment. However, with industry-wide profit margins averaging 29%, carwash owners can provide decent jobs and help to make our communities more environmentally friendly places. Carwash workers throughout Los Angeles have formed the Carwash Workers Organizing Committee of the United Steelworkers (CWOC) to raise their standard of living, to secure basic workplace protections, and to address the serious environmental and safety hazards that exist in their industry.

The High Price of Clean Cars

Our heart belongs to horsepower. Earthquakes have shaken this place, but nothing has shaped it like our mad automobile love.

—Los Angeles Times, June 21, 2006¹

On a sunny day, hundreds of cars might come through the carwash where I work. The boss yells at us to work faster as the cars line up down the street. We are not allowed to stop for a break or for lunch. They don't give us any fresh water to drink. Sometimes it's hard to breathe because of the chemicals; my eyes sting and my skin sometimes breaks out in a painful rash. For all this, I'm paid about \$35 for a 10-hour day and when I get sick I have no insurance to pay the bill.

—Saturnino Hernandez, carwash worker²

Car love

Angelenos do love their cars. This city is at the very heart of American car culture. It has the highest car density in the nation, with 92 cars per square mile and one car for every 1.8 persons.³ A recent study concluded that Angelenos are among the most car dependent people in the United States, driving some 7,694 miles per person per year.⁴ And, Angelenos spend more than residents of most other American cities to maintain their cars: \$10,361 in an average year compared to only \$7,834 nationwide.⁵

Washing cars is big business

California leads the nation in the number of professional carwashes, with approximately 1,500 operations. Los Angeles County has more carwashes than any other metropolitan area in the United States with about 430 establishments. And, if Los Angeles were compared to the states by the number of carwashes, it would rank ninth in the nation. According to the International Carwash Association, carwashes can provide average profit margins of 29%. In fact, carwashes in Southern California average approximately \$1 million in gross annual income.⁶ And it's no wonder. On average, Los Angeles enjoys ideal carwashing weather, with some 330 clear days per year.⁷ Depending on its size, an efficient carwash can move as many as 1,000 cars through the system per day at prices ranging from \$5 for an exterior-only wash to \$85 for a full service, or “deluxe,” hand wash with wax, dry,



and detailing. Prices for specialty services such as interior leather conditioning, engine cleaning, and custom detailing can soar past \$200.⁸

What price are we really paying to keep our cars clean?

It may come as a surprise to those of us who drive past dozens of carwashes around Los Angeles every day and see them simply as familiar places where cars go in one end of a high-tech tunnel and come out the other end squeaky clean. But carwashes can be dangerous places, not only for the people who work in them, but also for the communities in which they operate.

The thousands of workers who shampoo, wax, dry, and detail cars are some of the most exploited workers in Los Angeles. They frequently work in appalling conditions for low or, in many instances, no wages—forced to rely on occasional customer tips.⁹ Too often, carwash owners flout labor laws, health and safety regulations, and environmental protections in their single-minded drive for profits. Their practices put workers, customers, and even the general public at risk.



Working Conditions in Los Angeles' Carwash Industry

I live with my three brothers and I send money to my wife and kids in Mexico every month. They depend on my income. But sometimes, it's hard for me to cover all of my expenses, especially if I get sick and have to go to the doctor or miss work. Most of the time, I have to work two full-time jobs and some weeks I work more than 80 hours. It's especially hard when my paycheck from the carwash bounces.

—Sebastian Sanchez, carwash worker

The U.S. carwash industry consists of approximately 14,000 facilities in all 50 states. Carwash operators reported more than \$5 billion in revenue in 2002. State by state variation in the number of firms ranges from California on the high end with more than 22,000 reported employees in 1,500 establishments, to Alaska with only 21 facilities and 127 employees. California not only has the most carwashes, but also has the second highest average annual receipts per facility in the nation. In 2002, California carwash owners reported \$872 million in revenue, and Los Angeles County owners reported more than one-third of the state's total revenue, or \$251 million.¹⁰

Unfortunately, prosperity for carwash owners has not translated into a decent living for carwash workers. According to U.S. Economic Census data, reported carwash workers earned an average of \$12,932 in 2002. However, many Los Angeles carwash workers work off the books, and their wages are not reported to government tax authorities. As a result, the average take-home pay

There are three basic types of carwashes: conveyor, in-bay automatic, and self-service. In an in-bay automatic wash, the driver pulls into the facility and the washing mechanism moves over the stationary car, cleaning it with rotating brushes or rags. In a self-service wash, the driver cleans his or her own car using wands that dispense water and cleanser. This report focuses on the most labor-intensive of these systems, the conveyor carwash system, in which the car moves through a tunnel on a conveyor belt while its exterior is washed. A friction wash uses brushes or curtain strips made of cloth or other material to clean the vehicle. A frictionless wash uses high-pressure nozzles, and often workers scrub the car inside the tunnel as the car moves past. The conveyor carwash is either full service (including vacuuming and detailing) or exterior only (express). The frictionless system is the most labor intensive of all the systems with workers staffing several stations throughout the process, from ticket sales to detailing. Los Angeles County carwashes employ approximately 7,000 workers, of whom some 3,400 work in the City of Los Angeles.¹¹

of a Los Angeles carwash worker is probably much lower.¹²

In fact, a series of sweeps by the California Economic and Employment Enforcement Coalition (EEEC) in 2007 revealed that many carwash workers in California are paid on a cash-only basis and receive wages well below minimum wage or work for tips only in violation of federal and state laws. The EEEEC inspected forty-four California carwashes and issued sixty-six citations for violations, including not paying proper wages, not taking required payroll deductions, and employing child labor, among others.¹³

Los Angeles carwash workers often do not bring home enough money to rise above the poverty line or to access basic necessities.¹⁴ Although the minimum wage in California is \$8 per hour,¹⁵ many carwash owners pay their workers by the day at rates far below the legal minimum, and certainly below the accepted “living wage” for Los Angeles, which is currently \$10.33 per

hour.¹⁶ For example, typical daily rates are \$55 for shampooers and \$35 for dryers, or \$5.50 and \$3.50 per hour, 31% and 56% below the legal minimum wage.

According to a recent *Los Angeles Times* report, “paid workers at some of the . . . 1,000 washes throughout Southern California said they earned as little as \$1.63 an hour.” The number of employees working for tips only increases on the weekend and these workers mainly staff the drying area, one of the most grueling stations in the carwash. Workers report that tips are generally meager and do not amount to a substantial increase in take-home pay.¹⁷

Clearly, it is difficult, if not impossible, to survive on a carwash worker’s income in one of the most expensive metropolitan areas in the country. In a report based on 2006 Census data, the Los Angeles Alliance for a New Economy (LAANE) characterized Los Angeles residents earning less than \$24,000 as being in extreme poverty and unable to meet their most basic needs. Many of the working poor have no health insurance and often rely on government anti-poverty programs for survival. These workers are part of Los Angeles’ vast population of working poor—estimated at 40% of County residents—who live in this city surrounded by almost unimaginable wealth.

The prevalence of poverty and low-wage jobs has implications for all Los Angeles residents. Our communities—our schools, our neighborhoods, our social institutions, our businesses—suffer when so many live in abject need.¹⁸

In addition to frequently paying wages that are illegally low, Los Angeles carwash owners often deny their workers the most basic workplace rights and protections required by law. Working at a carwash can be difficult and even dangerous, especially during the hot summer months when temperatures in Los Angeles approach 100 degrees. Workers are frequently forced to work without safety equipment and training, information about the hazards and chemical exposures in their workplaces, clean drinking water, paid sick days, paid overtime, adequate time and space for breaks and meals, minimum wages, health insurance, and respect and dignity on the job.

Difficult, dangerous work with no job security

The vast majority of carwash workers in Los Angeles are monolingual Spanish-speaking immigrants from Latin America. This wasn't always the case. Until the late 1970s, native-born whites and African Americans dominated the workforce, as they did in most low-skill industries in Los Angeles. However, the Los Angeles labor market underwent a major restructuring in the 1970s and 1980s. Up to that time, several low-skill service sector occupations, such as drywall installation, janitorial work, and truck driving, were unionized. Strong unions in those industries raised standards for workers throughout the service sector, including carwash workers. But starting in the 1970s, employers sought to break the unions and many implemented sweatshop-like labor practices in order to drastically cut labor costs. As wages fell in several low-skill industries, many native-born workers moved into higher wage jobs, some of which remained unionized, while a growing immigrant workforce moved into the lowest wage positions.¹⁹

Many employers choose to hire immigrant workers because they are seen as the ultimate flexible, or casual, workforce—meaning workers are hired for as few or as many hours as the boss requires, thus ensuring that workers have no job security. Wages (if any are paid) are low, and benefits are non-existent. And because immigrant workers are often too frightened to complain, employers can get away with illegal and exploitative working conditions.²⁰

This flexibility suits the nature of carwash work, which resembles a traditional assembly line, in which the pace of the conveyor—and therefore the work—is set by the employer. The employer's profit depends on the number of cars that can pass through in a given time period and on his or her ability to sell more expensive services to clients, such as detailing. According to industry sources, an efficient full service conveyor driven carwash can service up to 1,000 cars per day.²¹

This means that workers are under tremendous pressure to work fast and to work according to a standard of cleanliness acceptable to customers. By the same token, the carwash is prone to down time—rainy days and slow periods when demand is slack. At these times, the employer can easily shed workers to whom he has no contractual obligation. Either way, a completely flexible workforce allows the employer to cut costs to the bone, while the workers absorb all the risks: risking accidents and injuries when working fast, and risking no work and thus no income when business is slow or non-existent.

Wages and work hours

I have worked at carwashes in Los Angeles since the 1960s—for more than 40 years. I’m 63 years old now. I can tell you, it’s gotten much worse for the workers over the years. The boss used to pay us for all the hours we worked and for the overtime too. I could support my family working in a carwash back then. Now I have to work odd jobs in order to pay my rent and for gas and other bills. We used to get breaks for lunch and to take a rest. No more. Now it seems we just work for hours with no breaks and no water, even on the hottest days. And, in the end, the boss shorts our paychecks. I’m organizing with the union because I see how they treat these younger folks. The boss has no respect for us. We work hard and we don’t deserve to be treated like animals.



—Feliciano Hernandez, carwash worker

Labor is one of the largest costs in operating a full-service carwash. Therefore, any reduction in labor costs will contribute to profitability. Employers rely on a wide range of tactics to keep labor costs as low as possible.²²

For example, according to workers interviewed for this report, on rainy days workers are often required to remain on the premises and wait for the weather to clear. However, *propineros*, or those who work for tips only, make no money during these periods. And many workers—even those who normally earn a daily or hourly rate—wait hours only to be sent home *without pay* when it becomes obvious to the manager that the weather is not going to improve.

In 2002, many of the Los Angeles organizations that dealt directly with low-wage workers, labor violations, labor enforcement, and the immigrant community formed a coalition: Los Angeles Workers Advocates Coalition (LAWAC).²³ LAWAC members, including Bet Tzedek Legal Services, have represented carwash workers in a variety of legal cases over the past six years. They report that the most common labor violations are non-payment and under-payment of wages, particularly for overtime.



“We work more than nine hours a day but only get paid \$35 dollars for it,” reports one worker at a carwash on Rampart Boulevard. “The owner fills out our time cards and only puts half the hours we worked. He says it’s for the insurance. We are told to sign the cards if we want to get paid. He pays us in checks, but he never gives us the stubs.”²⁴

Workers report that employers sometimes use two time cards for each employee in order to avoid paying overtime. Employers fill in time sheets for workers and routinely record fewer hours than those actually worked. And, employers that do issue paychecks as opposed to cash payments sometimes withhold paycheck stubs in order to avoid a paper trail. A worker at a carwash in El Monte said, “They asked me to give them a different social security number for my hours in the evening. They never paid me for overtime.”²⁵

The Western Carwash Association, an owners’ association to which many Los Angeles area carwashes belong, has acknowledged the serious problems within its industry and urges its members to report “rogue” employers: “The WCA believes that all carwash operators should comply with all applicable state and federal labor laws. Not only is this fair to our employees, but it establishes a ‘level playing field’ where we all compete from an equal base-point. We have had reports that some operators have engaged in illegal employment practices. . . . The rogue carwash owners must be reported.”²⁶

Meal and rest breaks, access to water and shade

Most carwashes are open during daylight hours, typically from 8 a.m. until 6 p.m. or from dawn until dusk. Typical carwash workers work five or six days per week. Their workweek is approximately 50-60 hours during the summer and 45-55 hours in the winter. On a busy day in the dry summer season, workers report that they often work at their stations throughout the 10-hour shift without taking breaks for rest or meals.²⁷

Some days I work for 10 hours in the drying area. A lot of times, I’m working under the hot sun on that black top and it’s boiling hot. The fumes from the wheel cleaner make me feel faint and nauseous. Once I passed out while I was drying a customer’s car. The doctor told me that it was from the heat and the stress. But I can’t quit my job, I have to support my family.

—José Cuestas, carwash worker



Under California law, employers must provide employees a 10-minute rest break for every four hours worked, and, with very limited exceptions, employers cannot have an employee work longer than five hours without affording the employee an uninterrupted meal period of no fewer than 30 minutes.²⁸ Attorneys for Bet Tzedek found that employees were routinely denied allotted meal and rest periods. A carwash worker in Manhattan Beach said, “When it is crowded, we don’t get breaks. We will work until there are no more cars to dry.”²⁹

California law also requires employers to make suitable resting facilities available to employees during working hours.³⁰ However, even when workers are allowed to take breaks, there is not always an appropriate facility available. In 2007, the California Occupational Health and Safety Administration (Cal/OSHA) fined the owner of Celebrity Car Wash on Vine Street in Los Angeles for not providing sanitary space where employees could eat and drink without the risk of toxic contamination.³¹

Workers at a carwash in Manhattan Beach reported that their eating tables are inside the washing area. And, the only space workers at a Torrance carwash have for eating and relaxing is a concrete area next to a dumpster.³² At a carwash in Hollywood, the workers' eating area is next to the large drain that receives the tunnel's dirty water.³³

In the summertime, it gets so hot inside the tunnel. They don't give us water or a place to cool off. If we want a drink, we have to buy it from the vending machines. My boss even raised the price of drinks recently. Some guys can't afford to buy drinks from the machine, so they go without.

—Carlos Cuestas, carwash worker



California law requires employers to provide drinking water and access to shade to prevent potentially deadly heat stroke.³⁴ Yet, several workers report that their employer does not provide water, and that they must resort to buying beverages from vending machines. In 2007, Cal/OSHA cited Blue Wave Car Wash on Santa Monica Boulevard and Celebrity Car Wash for not supplying drinking water to workers.³⁵

Respect and dignity

Carwash workers describe not only the difficult and sometimes dangerous work they do for poverty wages, but also the degrading treatment they endure from their employers. According to a worker in El Monte, “the supervisor humiliated us and pressured us to work faster. He would say ‘all right you bastards, I want you to work until soap suds are coming out of your f---ing mouths.’”³⁶

I am just tired of the disrespect. The boss recently accused me of stealing \$5 from a customer. He put his hands in my pockets right in front of the customer and the other workers. It was humiliating. I am not a thief.

—José Cuestas, carwash worker

Carwash workers are mothers, fathers, sons, and daughters—human beings who deserve respect and dignity. Carwash owners often treat them like pieces of machinery to be pushed and pulled, speeded up and slowed down on command, and then discarded. These workers struggle under difficult and dangerous working conditions and endure degrading treatment every day so that carwash owners can profit.

Workers Lack Health and Safety Protections

There appear to be rampant abuses of California's health and safety laws in carwashes throughout Los Angeles. This disregard for existing health and safety laws has resulted in injuries and illnesses. It is reasonable to expect that the long-term health effects of the chemicals that the workers are exposed to on a daily basis lead to potentially serious health conditions.

It is absolutely essential to the health of our community to ensure that all workers are afforded their basic rights and that employers are complying with California laws.

—Eden Flynn, Coordinator, Southern California Coalition for Occupational Safety and Health

A typical full-service conveyor driven carwash contains some or all of the following components:

- Extensive water and chemical delivery and collection system, including underground storage tanks;
- Chain and pulley system capable of pulling a 2-ton vehicle through the wash tunnel;
- Extensive electrical equipment in close proximity to water and wet surfaces;
- High pressure air hoses and vacuums;
- Surfaces constantly wet from water, grease, and oil residue; and
- Numerous toxic and carcinogenic chemicals used to clean and detail automobiles and clean the interior of the facility itself.

Any one of these components could expose workers to serious health and safety hazards, especially if workers are not equipped with protective gear or are not properly trained in their use.

California law requires employers to provide a safe and healthful workplace for their employees. Unfortunately, many carwash owners and managers violate laws regulating health and safety conditions in the workplace.³⁷ In a 2006 report, the California Coalition for Worker Occupational Safety and Health Protection (Cal-COSH) detailed the types of occupational safety and health violations that occur in California's carwashes, including a description of the toxic exposures to which carwash workers are subjected on the job.³⁸

According to Cal-COSH, an analysis of Cal/OSHA's database of violations revealed the following common health and safety violations at California carwashes between 2001 and 2005:

- Failure to provide sufficient personal protection equipment, such as goggles, gloves, and emergency eye wash stations;
- Inadequate communication to workers about their exposure to hazardous substances;
- Unprotected or improperly labeled electrical and other equipment;
- A lack of, or inadequate, injury and illness prevention programs (IIPP);
- Violations of heat stress and provision of drinking water regulations;
- Inadequate structures to keep vermin away from employee areas; and
- Insufficient washing and toilet facilities.³⁹

Unfortunately, it appears that safety precautions have not improved for California carwash employees since the 2006 Cal-COSH report. Between October 2006 and September 2007, the most frequently cited Cal/OSHA violations at carwash facilities were the lack of communication with employees about the dangers of hazardous substances and inadequate notification of workplace safety procedures. Cal/OSHA issued 99 citations for deficient hazard communications programs and 92 citations for ineffective injury and illness prevention programs during this period statewide.⁴⁰ Carwash workers interviewed for this report confirmed that they frequently do not have access to protective equipment, have not received safety training, and are unaware of eyewash stations or other first aid equipment in their workplaces.



I have worked at the carwash for almost five years and I've done just about every job in the carwash: shampooer, dryer, detailer, vacuumer, driver. The boss doesn't always give us gloves or masks to wear when we're shampooing the cars or cleaning the tires, even when we are using really harsh chemicals. I've never seen an eye wash station, a fire extinguisher, or a first aid kit.

—Saturnino Hernandez, carwash worker

An examination of citations against Los Angeles carwash owners revealed that some owners are not only violating the law, but are repeat offenders. For example, during 2007, Blue Wave Car Wash, Five Star Car Wash, and Celebrity Car Wash were cited for ineffective written hazard communications programs. Downtown Car Wash and several other operators received citations for not providing adequate information and training on hazardous materials in the workplace. Downtown Car Wash, Blue Wave Car Wash, Celebrity Car Wash, and Five Star Car Wash also received citations for “serious violations” such as not adequately guarding chain and pulley systems to prevent injuries. In addition, Downtown Car Wash, Blue Wave Car Wash, and Five Star Car Wash were cited for improperly implementing illness and injury prevention programs, and Blue Wave was cited for not providing enough lavatories for employees.⁴¹

Carwash operators are required by state law to properly maintain electrical equipment and other machinery by providing appropriate height-level guarding, in order to protect workers against machine parts, such as gears or sprockets.⁴² In September 2007, Blue Wave Car Wash and Celebrity Car Wash were fined and cited for “serious violations” for their failure to provide adequate guarding for gears or sprocket chain drives.⁴³

Employers must provide protective eye and hand gear to guard against excessive exposure to hazardous elements.⁴⁴ Nevertheless, Celebrity Car Wash and Blue Wave Car Wash have been cited by Cal/OSHA for their failure to provide adequate eye protection, such as goggles or protective shields. Celebrity Car Wash was also cited for not supplying gloves or other protective hand gear for employees who were repeatedly exposed to chemical substances and physical activities that could cause cuts or burns.⁴⁵

Carwash workers are exposed to harsh chemicals during every stage of the carwash process. The Cal-COSH study concluded that many of the products in use at carwashes are eye and skin irritants. Manufacturers recommend that individuals handling these substances wear protective clothing such as gloves, goggles, and rubber boots. One particularly harmful product is carnauba wax, which contains the carcinogen quartz. Improper exposure to quartz can cause damage to the central nervous system as well as the lungs, liver, and kidneys. Improper exposure to other common carwash products can irritate the respiratory tract, skin, and eyes, and may cause liver, kidney, and heart damage. If inhaled, some products can lead to headaches, convulsions, blindness, or even death.⁴⁶

Workers interviewed for this report described multiple instances in which managers ordered them to clean out the filters attached to waste water tanks with their bare hands. They also describe hauling leaky drums full of chemicals and wastewater or sludge across the property without

wearing protective gear. Researchers for this report visited dozens of carwashes in Los Angeles County and frequently witnessed workers inside the wash tunnel without gloves, boots, or aprons, and workers cleaning wheels in the detailing or drying areas without gloves, goggles, or other protective gear.⁴⁷

Some carwash products, particularly those designed to clean wheels, contain highly toxic chemicals including hydrogen fluoride (HF). Hydrogen fluoride is powerful enough to etch glass, and is used to pre-treat cars before shampooing in addition to wheel cleaning. It is highly corrosive and toxic; is irritating to the skin, eyes, and mucous membranes; and can cause respiratory irritation and hemorrhaging.⁴⁸



A worker at an El Monte carwash reported, “the smell [of the wheel cleaner] was very strong. Sometimes it would get in your eyes and burned. My eyes would tear and wash it away. Other workers who were more sensitive would get nosebleeds from smelling the strong chemicals. Others got nosebleeds from being out in the sun all day, especially in the summer.”⁴⁹

When skin is exposed to HF, the chemical quickly penetrates the skin and can cause destruction of deep tissues and even damage bones by dissolving calcium before the victim feels any symptoms. In 1999 an 18-year-old carwash worker in Detroit was pre-treating a vehicle’s wheels with a solution containing HF when the cleaner leaked onto her fingers. Her exposed fingers turned black and hardened, and three days later she had to have two fingers amputated.⁵⁰

The International Carwash Association (ICA) and representatives of HF manufacturers warn against its use in carwashes. Tom Crane, director of communications for the specialty chemical division of Allied Signal, said of carwash clients who seek to purchase HF, “unless...trained chemical professionals...understand the hazards and have protective clothing, we really don’t want their business.”

The laboratory manager of Warsaw Chemical Company, another leading manufacturer that provides HF solutions to carwashes, said, “I warn people that this stuff (hydrogen fluoride) is nasty. I wouldn’t use it in my own [car] wash if I were an operator.”⁵¹ Still, the ICA warns that many carwashes routinely use the dangerous acid because of its ability to cut through stubborn brake dust and other buildup on hard-to-clean wheels and rims.⁵²

Water extractors present another significant hazard to carwash workers. To remove water from towels, workers put them into centrifugal water extractors that work like washing machine spin cycles but spin much faster and are more powerful. Although the extractors are supposed to remain locked until the spinning stops, the feature is often missing or disabled.

Workers interviewed for this report said they have frequently stuck their hands into spinning extractors to retrieve towels, and some have sustained injuries doing so. In 1992 Joshua Zimmermann, an employee at a carwash in North Dakota, reached into an extractor that was still spinning and had his arm ripped off.⁵³

Other hazards associated with carwashes are falls and vehicle accidents. Workers often work on wet and oily surfaces, and they report frequent falls and occasional broken limbs or other injuries. In addition, cars can prove lethal in a carwash environment, whether driven by customers or workers.⁵⁴

It is clear that some carwash operators in Los Angeles endanger the health and safety of their employees, and even their customers, by their callous disregard for legal standards in the workplace, including protective equipment, training, hazard communication programs, and first aid measures.

Carwash Industry's Negative Impact on Our Environment

Managing vehicle washing near drinking water sources is important because the wash water can flow into storm water drains and enter surface water sources untreated. The wash water can also percolate through the soil or enter the subsurface through carwash wells, and contaminate ground water. The contaminants in vehicle wash water can cause a variety of health effects, including kidney damage, circulatory system problems, increased cancer risk, and delays in physical or mental development.

—U.S. Environmental Protection Agency⁵⁵

According to the California Environmental Protection Agency (Cal/EPA), professional carwashes can have an adverse impact on the environment if not properly managed. Cal/EPA urges operators to deal responsibly with wastewater discharge; sludge from dirt, oil, and hazardous chemicals; and groundwater contamination. The federal Clean Water Act requires carwash operators to handle wastewater and sludge appropriately.⁵⁶

Known toxins and harmful substances in carwash wastewater include the following:

- Benzene, lead, zinc, chromium, arsenic, pesticides, herbicides, nitrates, and other metals contained in oil and grease;
- Detergents, including biodegradable detergents, that can be poisonous to fish;
- Phosphates, plant nutrients that can cause excessive growth of nuisance plants in water bodies;
- Chemicals, such as hydrogen fluoride (HF), ammonium bi-fluoride (ABF), toluene, and other solvent-based solutions that are harmful to living organisms;
- Debris that can clog storm sewer inlets and grates and thereby prevent storm water drainage to the sewer.⁵⁷

Some environmentalists and government regulators contend that washing vehicles in professional carwashes is more environmentally responsible than home washing.⁵⁸ This, of course, assumes



that carwash operators are behaving responsibly and are abiding by local, state, and federal laws to protect the environment. Indeed, *if* carwashes are run responsibly, they provide a good alternative to washing your car in your driveway and allowing dirt, water, and chemicals to run off into storm drains.

Los Angeles and other California communities maintain a sanitary sewer system where wastewater is channeled for treatment before it enters surface waters. If wastewater is not discharged appropriately into the sanitary sewer system and instead reaches storm drains, it will then be discharged directly to bodies of water without treatment to remove pollutants.⁵⁹



Carwashes use a tremendous amount of water, more than 50 gallons per vehicle washed.⁶⁰ According to the U.S. Environmental Protection Agency (EPA), managing carwash wastewater is essential for the health of our environment and our communities because, “the wash water can flow into storm water drains and enter surface water sources untreated. The wash water can also percolate through the soil or enter the subsurface through carwash wells and contaminate ground water.”⁶¹ In order to conserve water and to prevent runoff, carwash operators can install wastewater recycling systems. These recycling systems can include a series of underground tanks, oil/water separators, filters, and ozonation or aeration tanks. Solids, or sludge, are allowed to settle and are then pumped out of the system to be hauled off site for proper disposal.⁶²

To address the danger to our water systems, both the City and County of Los Angeles have passed a variety of ordinances affecting the operation of professional carwashes as well as water reclamation systems. For example, the City of Los Angeles Stormwater and Urban Runoff Pollution Control Ordinance became law in 1998 specifically to address the illegal discharge of pollutants into the storm drain system.⁶³ Other ordinances deal with the maintenance of underground storage tanks and disposal of industrial waste or sludge.⁶⁴

As with the laws regulating workers’ wages, hours, and occupational health and safety, these environmental standards—and the best water recycling systems—are only as good as the carwash owners’ compliance and the enforcement effort mounted by government. When carwashes fail to comply with environmental guidelines, the chemicals used in the cleaning process as well as the dirt and chemicals on the cars themselves (oil, grease, gasoline, and heavy metals) are carried in wastewater off the property and into the public water system.

Workers interviewed for this report described multiple situations in which wastewater was leaked into storm drains. Inadequate upkeep and infrequent cleaning of filters causes blockages in the drains designed to transport water into the recycling system. Instead of draining into the underground tanks, dirty water backs up and floods into the tunnel or other areas of the property, at times resulting in wastewater runoff into storm drains and public sewers. Finally, chemicals spilled onto the concrete or asphalt surfaces of the carwash may be hosed off the property into public gutters or be carried off the property in rainwater runoff. From there they may flow into storm drains.



The manager makes us clean out the filter for the drainage system pretty often. We lift off the cap to the drain and scrape the residue from all the chemicals and garbage off the filter with our bare hands. It's thick and black and it really stinks. We put the muck into buckets and then dump it into the dumpster. Sometimes, the drains overflow if there's a lot of rain and the dirty water runs down into the street.

—Bosbely Reyna, carwash worker

An analysis of case files in the Los Angeles County Department of Public Works (DPW) supports the workers' contentions. The DPW regulates all unauthorized releases from underground storage tanks, including those in carwashes.⁶⁵ Carwash owners in Los Angeles have been cited for violating several ordinances. For example, in 2003 and 2007 the department issued citations against the Lawndale Carwash on Hawthorne Boulevard. Inspectors found, among other violations, that wastewater was being allowed to flow off the property into storm drains.⁶⁶

Lawndale Car Wash was again found to be in violation of environmental laws in September 2007. Once again, the DPW issued citations for discharge into the storm drain system from the facility's operations, and multiple Notices of Noncompliance to the carwash for failing to respond to previous notices.⁶⁷ In October, the County cited Lawndale Car Wash for violations of the City of Lawndale's Municipal Code, and threatened the owner with a penalty of up to \$1,000 per day and/or up to six months in county jail, with each day's continued violation counted as a separate offense.⁶⁸

Carwashes are often located in close proximity to private residences, schools, and parks. For example, Marina Car Wash, Vermont Hand Wash, and Celebrity Car Wash are all located within 500 feet of neighborhood elementary schools or parks. In addition, some carwash sites—including Marina Car Wash and Vermont Hand Wash—are in areas prone to liquefaction, a situation in which soil loosens like a liquid during an earthquake causing greater property destruction that may pose even larger environmental threats if sewer and underground storage tanks are damaged.⁶⁹

A responsibly managed professional carwash can provide a model for efficient water recycling and appropriate handling of hazardous wastes. Professional carwashes can provide a good alternative to washing our cars at home. They can save water and prevent wastewater runoff into our streams, rivers, and oceans. However, it is clear that too many Los Angeles carwash owners disregard their legal and ethical responsibilities to protect our environment.

The Fight for Justice in the Carwash Industry

For years, carwash workers have been treated as the new modern slave labor, sometimes working for no wages, with no safety protections, no sick days, and no healthcare. So, for these workers, this campaign is more than just about giving them an opportunity at a life out of poverty. It's about giving them and their children the basic right to survive as human beings.

—Maria Elena Durazo,
Executive Secretary-Treasurer, Los Angeles
County Federation of Labor, AFL-CIO



It doesn't have to be this way

Right now in Los Angeles, some carwash owners are accumulating large profits by cheating workers and polluting our environment. However, with profit margins averaging 29%, carwash owners can provide decent jobs and help to make our communities more environmentally friendly places. So, carwash workers and a diverse group of concerned Angelenos are joining together to clean up the carwash industry.

Carwash workers throughout Los Angeles County have formed the Carwash Workers Organizing Committee of the United Steelworkers (CWOC) to raise their standard of living, to secure basic workplace protections, and to address the serious environmental and safety hazards that exist in their industry.

I'm organizing with my co-workers because I'm tired of the injustice, the disrespect. I'm tired of the working conditions. We work really hard, but it's never enough for the boss. They yell at us to work faster and tell us we're no good. They never thank us for doing a good job.

—Bosbely Reyna, carwash worker

Workers' rights are human rights

The United Nations' Universal Declaration of Human Rights states:

- Everyone has the right to work, to free choice of employment, to just and favorable conditions of work and to protection against unemployment.
- Everyone, without any discrimination, has the right to equal pay for equal work.

- Everyone who works has the right to just and favorable remuneration ensuring for himself and his family an existence worthy of human dignity, and supplemented, if necessary, by other means of social protection.
- Everyone has the right to form and to join trade unions for the protection of his interests.⁷⁰

Many of the rights proclaimed in the Universal Declaration of Human Rights, such as the right to a minimum wage, to be free from discrimination, to organize unions, and to basic health and safety protections, are enshrined in our federal and state laws.⁷¹ For too long, however, these laws have not been adequately enforced in the Los Angeles carwash industry. Scofflaw employers who are willing to break laws and undercut labor and environmental standards in order to increase their profits face few penalties even when they are caught.⁷²

Carwashes are one of the major industries in Los Angeles that remain completely under the radar; few individuals notice the long, hard hours, extremely low pay, and often hazardous working conditions that carwash employees endure. As members of the Jewish community, we have the opportunity to ensure that our decisions as consumers reflect the values of our tradition and honor these hard-working men and women. We urge Los Angeles' carwashes to "clean up their act" and treat their workers with the respect they deserve.

—Jaime Rapaport, Southern California Regional Director, Progressive Jewish Alliance

The Car Wash Worker Law

California is home to hundreds of full-time carwashes that employ tens of thousands of carwash workers.

The work performed by carwash employees is laborious, fast paced, and potentially hazardous.

Car wash employees work long hours and may service hundreds of vehicles on any given workday.

The carwash industry is plagued with labor law violations, including minimum wage, overtime, and rest and meal period violations.

—AB 1688, the Car Wash Worker Law (2003)⁷³

In 1999, a group of workers' rights advocates in Los Angeles recognized that this lack of enforcement and real penalties meant that many carwash owners were exploiting workers with almost total impunity. In response, LAWAC led a long and hard-fought campaign to pass AB 1688, the Car Wash Worker Law, in the California state legislature in 2003. The law requires all carwash operators in California to register annually with the Labor Commissioner. The registration requirement was intended to promote good labor practices by requiring compliance with local and state regulations, as well as the California Labor Code.⁷⁴ The law represents legislative recognition that many carwash owners do not comply with minimum labor standards.

The CLEAN Carwash Campaign

The campaign to pass the Car Wash Worker Law—in which a diverse coalition of advocates stepped up to demand accountability from the carwash industry and enforcement by our government—showed that there is strong support for carwash workers in our community. That campaign continues today with the formation of the CWOC. The effort to clean up the carwash industry is based on workers joining together with each other and with members of their communities to claim their rights to decent work and a voice on the job, while raising industry standards and safeguarding the community from the threat of pollution.

In order to educate the public and build support for the CWOC, the Community-Labor-Environmental Action Network (or CLEAN Carwash Campaign) has brought together a diverse coalition of labor, immigrant rights, religious, environmental, and community organizations.

Together, the CWOC and the CLEAN Carwash Campaign are committed to:

- Improving working conditions for carwash workers, and insisting that carwash owners provide safe workplaces and meet minimum labor and occupational safety and health standards;
- Ensuring the rights of all carwash workers to form and join unions and bargain collectively with their employers; and
- Demanding that carwash owners abide by existing environmental regulations and clean up their practices so that carwashes do not pollute our environment.

The CWOC and the CLEAN Carwash Campaign are committed to shining a light on the carwash industry and bringing together workers, owners, politicians, regulators, environmental advocates, and members of the community to make real change in the industry.

The CWOC will seek the following objectives through collective bargaining with employers once a majority of employees at any carwash choose to be represented by the CWOC.

We Demand Basic Workplace Protections

1. No employee may be terminated or otherwise disciplined without just cause.
2. Employees have the right to a safe workplace.
3. Employees have the right to receive work assignments through a fair system based on seniority that governs seasonal layoff and recall, days and hours of work, and weekend work.
4. Employees will have the right to take a reasonable number of days off when they are sick.

We Demand a Voice on the Job

5. The employer will negotiate in good faith with the chosen representative of its employees about their terms and conditions of employment.

6. Employees have the right to raise grievances with their employer through their chosen representative in a fair process ending in a decision by a neutral third party.

We Demand Real Improvements in Wages and Benefits

7. All employers should be required immediately to improve all workers' wages, hours, and benefits so that they comply fully with legal standards. Moreover, employers should not reduce any employee's wages, hours, or benefits that are already above these minimum standards. Mindful of the competitive nature of the carwash industry, the CWOC will seek to bargain for wages, benefits, hours, and working conditions above these standards as more employees in the industry choose to be represented.

What Can You Do to Help Clean Up the Carwash Industry?

Please join the CLEAN Carwash Campaign by visiting our web site, www.cleancarwashLA.org, and adding your name and/or the name of your organization to our list of allies.

If you are a carwash owner and would like to sign the CLEAN Carwash Agreement, you can contact us through our web site. As carwashes sign the CLEAN Carwash Agreement, we will add their names to our list of CLEAN Carwashes and recommend that Angelenos patronize their businesses.

We will continue to update the web site with information about the plight of Los Angeles' carwash workers and the CLEAN Carwash Campaign.

Endnotes

¹Patt Morrison, “Our true heartthrob,” *Los Angeles Times* (21 June 2006): S3.

²Attorneys of Bet Tzedek Legal Services and other researchers interviewed numerous workers for this report. Some of the workers asked that their names not be used because of fear of retribution by their employers. However, all statements are those of actual carwash workers.

³Eric Eidlin, “The worst of all worlds: Los Angeles and the emerging reality of dense sprawl,” *eCow College of Engineering, University of Wisconsin-Madison* (ecow.engr.wisc.edu/cgi-bin/get/cee/970/wittwer/3-03densesprawl.pdf, 3 March 2005), 10 March 2008.

⁴Jeff Kenworthy and Felix Laube, “Has transit missed the bus in Los Angeles?,” *International Union of Public Transportation Millennium Cities Database for Sustainable Transport* (www.sonic.net/~woodhull/trans/LA_Kenworthy_Laube.PDF, 1999), 10 March 2008.

⁵Only residents of Detroit and Philadelphia spent more according to the 2005 survey. Les Christie, “Costliest car ownership cities: where you live can add thousands to your car ownership costs,” *CNNMoney.com* (money.cnn.com/2005/07/29/Autos/costliest_car_ownership_cities/index.htm, 20 October 2005), 10 March 2008. For the national average, see American Automobile Association, “Your driving costs,” *AAA Exchange Energy/Gas Prices* (www.aaaexchange.com/Assets/Files/20073261133460.YourDrivingCosts2007.pdf, 2007), 10 March 2008.

⁶Sonia Nazario and Doug Smith, “Inspectors find dirt on books at Southern California carwashes,” *Los Angeles Times* (www.latimes.com/news/local/la-me-carwash23mar23,0,3592975.story, 21 March 2008). For a summary of data on the carwash industry derived from the 2002 U.S. Economic Census, see Matt Parker, “Wage, labor, and safety conditions in the California carwash industry,” (unpublished paper, UCLA Department of Urban Planning, 2006), 1-3. For the national average profit margin of full service conveyor carwashes, see International Carwash Association, *2002 Cost of Doing Business Report* (www.ICA_CostOfDoingBusinessFinalReport_2002.pdf, March 2004), 26.

⁷Western Regional Climate Center, “Los Angeles, California, International Airport,” *Normals, Means, and Extremes* (www.wrcc.dri.edu/cgi-bin/cliiled.pl?ca23174), 10 March 2008.

⁸On maximum throughput, see Ryco Manufacturing Company, “Maximizing conveyor throughput,” *Ryco Tech Talk* (www.ryko.com/White%20Paper%20Revised.pdf) 10 March 2008. Car wash price estimates are based on a survey of 100 Los Angeles area conveyor carwashes conducted by University of California-Los Angeles students between October 26 and December 9, 2007. Students were fulfilling requirements for the course, *Chicano Studies 128: Race and Gender, Latino/as and the U.S. Labor Movement*.

⁹Forcing employees to work for tips only is illegal. Cal. Labor Code § 351 (an employer cannot credit an employee’s tips against wages due); Cal. Labor Code § 1197, and IWC Order MW-2007 (employers must pay at least the minimum wage); see also 29 U.S.C. § 203(m).

¹⁰Parker, 1.

¹¹For a description of the various kinds of carwashes, see Illinois Environmental Protection Agency, “How do I handle my professional carwash wastewater?,” *Office of Small Business Publications* (www.epa.state.il.us/small-business/car-wash/car-wash.pdf, July 2002), 10 March 2008. For estimates of the number of workers in Los Angeles’ carwash industry, see Brent Haydamack and Daniel Flaming, “Hopeful workers, marginal jobs: LA’s off-the-books labor force,” *Economic Roundtable* (City of Los Angeles’ LA Economy Project, Dec 2005), 49.

¹²The reality for California carwash workers is likely far worse than the U.S. Economic Census data suggests. The data reflects only those employees reported to the U.S. Economic Census. See Parker, 5-6.

¹³Investigators with the California Economic and Employment Enforcement Coalition (EEEC) conducted sweeps of carwashes in Orange County in July 2007 and San Francisco, Alameda, and Contra Costa Counties in May 2007. See California Department of Industrial Relations, “News Releases,” (www.dir.ca.gov/dirnews/NR2007.html), 17 March 2008.

¹⁴The 2007 Poverty Threshold, as defined by the U.S. Census Bureau is \$10,787 for a single person living alone. For a household of two adults and two children under age 18, the threshold is \$21,027. See U.S. Census Bureau, “Poverty Thresholds 2007,” (www.census.gov/hhes/www/poverty/threshld/thresh07.html), 16 March 2008. For information on poverty in Los Angeles, see Los Angeles Alliance for a New Economy (LAANE), “Poverty, jobs, and the L.A. economy: an analysis of U.S. census data and the challenges facing our region,” (www.laane.org/research/los_angeles_economy_2007.html, 28 Aug. 2007), 18 March 2008.

¹⁵Cal. Labor Code § 1182.12.

¹⁶Los Angeles was one of the first cities to enact a “living wage” law in 1997. The law requires companies that do business with the city to pay workers at least \$9.08 per hour with health benefits, or \$10.33 without. See LAANE, “History of Los Angeles Living Wage,” (www.laane.org/policy/lw_history.html), 16 March 2008.

¹⁷Nazario and Smith, *L.A. Times*. Estimates of daily rates and wages and tip amounts were derived from interviews with carwash workers by the authors and Bet Tzedek attorneys.

¹⁸LAANE, “Poverty, Jobs and the Los Angeles Economy,” 2-8.

¹⁹Ruth Milkman, *L. A. Story: Immigrant Workers and the Future of the U.S. Labor Movement* (New York: Russell Sage Foundation, 2006), 8-10 and 80-82.

²⁰*Ibid.*, 101-113.

²¹Ryco “Maximizing conveyor throughput,” 10 March 2008.

²²Parker, 18-19.

²³In 2006, LAWAC member organizations joined together with Northern California worker advocates to create the Coalition of Low-wage and Immigrant Worker Advocates (CLIWA).

²⁴For a summary of several cases brought on behalf of carwash workers by Bet Tzedek Legal Services, see Parker, 18-22.

²⁵Parker, 20.

²⁶Western Carwash Association, “Reporting employment fraud in California,” (www.wcwa.org/index.cfm?Page=Bet+terBusiness), 5 March 2008.

²⁷Parker, 20.

²⁸Cal. Labor Code § 512; 8 Cal. Code Regs. § 11090 ¶¶ 12, 11.

²⁹Parker, 29.

³⁰*Ibid.*; see also 8 Cal. Code Regs. § 11090 ¶ 13(B).

³¹Federal Occupational and Safety Administration (OSHA), “Celebrity Car Wash Inspection No. 306084740,” *OSHA Statistics Inspection Information* (www.osha.gov/pls/imis/establishment.inspection_detail?id=306084740, 27 September 2007), 3 March 2008.

³²Parker, 26.

³³*Ibid.*, 29.

³⁴8 Cal. Code Regs. §§ 3395, 3363.

³⁵Federal OSHA, “Blue Wave Car Wash Inspection No. 306084732,” *OSHA Statistics Inspection Information* (www.osha.gov/pls/imis/establishment.inspection_detail?id=306084732, 27 September 2007), 28 February 2008. Federal OSHA, “Celebrity Car Wash Inspection No. 306084740,” *OSHA Statistics Inspection Information* (www.osha.gov/pls/imis/establishment.inspection_detail?id=306084740, 27 September 2007), 3 March 2008.

³⁶Parker, 18.

³⁷California’s general occupational safety and health standards are codified at: Cal. Labor Code §§ 6300-6413.5; 8 Cal. Code Regs. §§ 3200-6184.

³⁸Cal-COSH, “Car wash workers: the hazards of carwash work and how to reduce or eliminate them,” (Cal-COSH, unpublished paper, 2006), 1.

³⁹*Ibid.*, 2-4.

⁴⁰OSHA, “Frequently cited OSHA standards” *OSHA Statistics Inspection Data*, (www.osha.gov/pls/imis/citedstandard.html, September 2007), 28 February 2008.

⁴¹Federal OSHA, “Blue Wave Car Wash Inspection No. 306084732,” *OSHA Statistics Inspection Information* (www.osha.gov/pls/imis/establishment.inspection_detail?id=306084732, September 2007) 28 February 2008. Federal OSHA, “Five Star Car Wash Inspection No. 310196530,” *OSHA Statistics Inspection Information* (www.osha.gov/pls/imis/establishment.inspection_detail?id=310196530, 7 March 2007), 28 February 2008. Federal OSHA, “Celebrity Car Wash Inspection No. 306084740,” *OSHA Inspection Information* (www.osha.gov/pls/imis/establishment.inspection_detail?id=306084740, 27 September 2007), 3 March 2008. Federal OSHA, “Downtown Car Wash Inspection No. 125923698,” *OSHA Statistics Inspection Information* (www.osha.gov/pls/imis/establishment.inspection_detail?id=125923698, 27 September 2007), 28 February 2008.

⁴²See, e.g., 8 Cal. Code Regs. § 4075(a).

⁴³According to the California Labor Code, a “serious violation” is a violation of health and safety standards from which there is a “substantial probability that death or serious physical harm could result.” 8 Cal. Code Regs. § 334(c). Federal OSHA, “Blue Wave Car Wash Inspection No. 306084732,” *OSHA Statistics Inspection Information* (www.osha.gov/pls/imis/establishment.inspection_detail?id=306084732, September 2007) 28 February 2008. Federal OSHA, “Celebrity Car Wash Inspection No. 306084740,” *OSHA Inspection Information* (www.osha.gov/pls/imis/establishment.inspection_detail?id=306084740, 27 September 2007), 3 March 2008.

⁴⁴See 8 Cal. Code Regs. §§ 3382, 3384.

⁴⁵Federal OSHA, “Blue Wave Car Wash Inspection No. 306084732,” *OSHA Statistics Inspection Information* (www.osha.gov/pls/imis/establishment.inspection_detail?id=306084732, September 2007) 28 February 2008. Federal OSHA, “Celebrity Car Wash Inspection No. 306084740,” *OSHA Inspection Information* (www.osha.gov/pls/imis/establishment.inspection_detail?id=306084740, 27 September 2007), 3 March 2008.

⁴⁶Cal-COSH, 6-7, and Parker, 24-26.

⁴⁷Survey of Los Angeles carwashes by UCLA students, cited in n. 8.

⁴⁸Department of Environmental Health and Safety, “Hydrofluoric Acid: Chemical Safety Information,” University of North Carolina at Chapel Hill, Environmental Affairs Office, (ehs.unc.edu/environmental/docs/hydrofluoricacid.pdf), 14 March 2008.

⁴⁹Parker, 24.

⁵⁰Professional Carwashing & Detailing, “Late breaking news: hydrofluoric acid harms wash worker,” (www.carwash.com/article.asp?IndexID=4231312, Dec. 1999), 26 Feb. 2008.

⁵¹Professional Carwashing & Detailing, “A deadly rinse: the dangers of hydrofluoric acid,” (www.carwash.com/article.asp?IndexID=4230101, Jan. 1999), 26 Feb. 2008.

⁵²For the International Carwash Association (ICA) discussion of concerns about use of HF, see Professional Carwashing & Detailing, “ICA’s Paisner calls for chemical summit,” (www.carwash.com/news.asp?N_ID=22983, June 2001), 26 Feb. 2008; and ICA, “ICA update March 2001,” (memo entitled “Chemical Use Alert,” www.carcarecentral.com/ [member login and password required]), 26 Feb. 2008.

⁵³Parker, 28.

⁵⁴For example, see “Carwash employee dies after being hit by car,” *Los Angeles Times* (26 Apr. 2007): B4; and “Accident that killed carwash worker to be reviewed,” *Associated Press* (28 Feb. 2006).

⁵⁵U.S. Environmental Protection Agency (EPA), “Source Water Protection Practices Bulletin: Managing Vehicle Washing to Prevent Contamination of Drinking Water” (July 2001), 3.

⁵⁶California Department of Toxic Substances Control, “Wastewater management,” (www.dtsc.ca.gov/PollutionPrevention/ABP/upload/TD_FS_WastewaterMgmt.pdf, Sept. 2006), 17 March 2008; and Federal Clean Water Act, 33 U.S.C. § 1251 et. seq.

⁵⁷Illinois Environmental Protection Agency (EPA), “How Do I Handle My Professional Car Wash Wastewater?,” *Office of Small Business - Publications* (<http://www.epa.state.il.us/small-business/car-wash/car-wash.pdf>, July 2002), 27 November 2007.

⁵⁸U.S. Water News Online, “Environmental Protection Agency honors carwash association as environmental hero,” (www.uswaternews.com/archives/arconserv/3envpro5.htm, May 2003), 25 Feb. 2008.

⁵⁹Los Angeles Department of Public Works, “LA sewers: how the sewer system works,” (www.lasewers.org/sewers/about/how_sewer_works.htm#thumbtop), 17 March 2008.

⁶⁰ICA, “Water use in the professional carwash industry,” (ICA, 2002), 15.

⁶¹EPA, “Source Water,” 3.

⁶²Ibid.

⁶³Los Angeles, Cal., Mun. Code § 64.70 *et. seq.*

⁶⁴Los Angeles’ Fire Department oversees environmentally-related programs including Los Angeles Underground Tank Ordinance. See Los Angeles, Cal., Mun. Code § 57.31.30 *et. seq.* The hazardous materials disclosure program was implemented in 1985 to identify hazardous materials used, stored, and processed by city businesses. Subsequent state legislation created the Unified Hazardous Waste and Hazardous Materials Management Regulatory Program (Unified Program) and the Fire Department was certified as the City’s Unified Program Agency (CUPA) in 1997 (lafd.org/prevention/underground/index.html), 18 March 2008. See 27 Cal. Code Regs. § 15100 *et. seq.*

⁶⁵Los Angeles Department of Public Works (DPW), “Underground storage tank (UST) program,” (ladpw.org/epd/ust/), 17 March 2008.

⁶⁶DPW, “Complaint Report,” 10 March 2003; DPW, “Notice,” 9 May 2003, violation no. V380500.

⁶⁷DPW, Environmental Programs Division, “Notice of Noncompliance,” 4 Sept 2007, violation no. 541009.

⁶⁸DPW, Environmental Programs Division, “Notice of Violation and Order to Comply,” 19 Oct 2007, violation no. 544552.

⁶⁹City of Los Angeles, Department of City Planning Parcel Profile Reports, assessor parcel nos. 4241035023, 5542001022, and 5533018001,” Zoning Information and Map Access System (ZIMAS) (zimas.lacity.org/search.asp?SearchBy=searchAPN&ToolTips=true), 17 Mar 2008 and 15 Feb 2008.

⁷⁰Universal Declaration of Human Rights, G.A. Res. 217 (III), U.N. Doc A/810, at 71 (1948), www.un.org/Overview/rights.html, 10 March 2008.

⁷¹Several federal and state agencies have been charged to protect the rights of California’s workers and to keep our environment safe. These include the California Department of Industrial Relations’ Division of Labor Standards Enforcement (DLSE), Division of Occupational Safety and Health (Cal/OSHA), California Environmental Protection Agency (Cal/EPA), and the National Labor Relations Board (NLRB).

⁷²This lack of enforcement and penalties is not unique to the carwash industry, particularly with regard to the enforcement of the right to organize unions. According to Human Rights Watch, “the reality of NLRA enforcement falls far short of its goals. Many workers who try to form and join trade unions to bargain with their employers are spied on, harassed, pressured, threatened, suspended, fired, deported or otherwise victimized in reprisal for their exercise of the right to freedom of association. ... In the United States, labor law enforcement efforts often fail to deter unlawful conduct. When the law is applied, enervating delays and weak remedies invite continued violations.” Human Rights Watch, *Unfair Advantage: Workers’ Freedom of Association in the United States Under International Human Rights Standards* (New York: Human Rights Watch, 2000), 9.

⁷³Car Wash Worker Law, ch. 825, 2003 Cal. Adv. Legis. Serv. 825 § 1(a)-(d) (Deering).

⁷⁴Although the law passed in 2003, it did not take effect until 2005 when the California Department of Industrial Relations issued implementation regulations for the new law. By that time, there was only one year left before the law would expire under its sunset provision. Fortunately, LAWAC continued to fight for the Car Wash Worker Law and it was extended through 1 January 2010.

The CLEAN Carwash Campaign includes the following endorsers:

AFL-CIO

Asian Pacific American Labor Alliance (APALA)

American Civil Liberties Union of Southern California (ACLU)

Bet Tzedek Legal Services

California Labor Federation

Central American Resource Center (CARECEN)

Coalition for Humane Immigrant Rights of Los Angeles (CHIRLA)

Clergy and Laity United for Economic Justice (CLUE)

Institute of Popular Education of Southern California (IDEPSCA)

Koreatown Immigrant Workers Alliance (KIWA)

Los Angeles Alliance for a New Economy (LAANE)

Los Angeles County Federation of Labor, AFL-CIO

Los Angeles-Orange County Organizing Committee, AFL-CIO

Maintenance Cooperation Trust Fund (MCTF)

Mexican American Legal Defense and Education Fund (MALDEF)

National Day Laborer Organizing Network (NDLON)

National Immigration Law Center (NILC)

National Lawyers Guild

Pride At Work, AFL-CIO

Progressive Jewish Alliance (PJA)

UCLA Labor Center

UNITE HERE Local 11

United Steel, Paper and Forestry, Rubber, Manufacturing, Energy, Allied

Industrial and Service Workers International Union (USW)

USW District 12

USW Local 675

Wage Justice Center