



Dear Prospective Customer,

One question we hear from time to time is:

“Are Sparkling Bins systems EPA compliant?”

It’s a fair question, and we want to give you a straightforward answer. Sparkling Bins systems are designed from the ground up to support environmentally compliant bin-cleaning operations, including capturing, containing, and transporting wastewater generated during cleaning.

Our cleaning hoppers feature a closed-top design specifically intended to keep wash water contained while the vehicle is in operation or traveling on public roads. This is an important distinction. Transporting wash water in an open-top container can create the potential for spills, leaks, or discharge and may violate applicable environmental, transportation, or sanitation requirements. Our closed-top design helps operators keep wastewater securely contained from the time it is collected until it reaches an appropriate disposal location.

We also incorporate a custom catch tray into the hopper to capture and filter debris or solid waste that may remain in the bin as it is raised for cleaning. This helps prevent solid material from entering the wash water holding tank and keeps debris separated from the captured wash water for proper disposal.

The entire system is self-contained and designed to capture and hold the wash water generated during bin cleaning, rather than allowing it to be discharged onto streets, into storm drains, or onto surrounding property.

But there’s an important part of compliance that applies to every bin-cleaning operator:

Once captured, wash water must still be properly managed and disposed of. The appropriate disposal method can vary depending on where you operate. That's why we encourage every Sparkling Bins client to contact their local city, county, sewer authority, or wastewater treatment facility to obtain approval for the proper disposal of their collected wash water.

What About Claims That Other Systems Are “EPA Compliant”?

You may have seen a publicly available January 4, 2023, letter from the Michigan Department of Environment, Great Lakes, and Energy (EGLE) about another bin-cleaning equipment manufacturer. This letter is sometimes cited when discussing EPA compliance. We think it's important to review what the letter says. EGLE states that the inspected system: “allows the same water to be re-used multiple times for cleaning bins.” It also says the system can clean multiple bins without refilling or discharging used water. That may be viewed as a good feature, but reusing water multiple times doesn't mean the wash water disappears or that it never needs to be properly managed.

In fact, the same Michigan letter states:

“Any cleaning liquids or water generated on the units must be managed in accordance with Part 121, Liquid Industrial By-Products in the State of Michigan.”

The letter also addresses local sewer authorities' acceptance of liquid waste from the cleaning process and recommends obtaining written approval.

That's really the heart of the issue. Whether a system holds the water for one cleaning cycle or filters and reuses it for multiple cleaning cycles, the operator is still responsible for properly managing the wash water generated by the business. The Michigan letter confirms that the manufacturer met the requirements evaluated during that state inspection. It does not say that the U.S. EPA certified the equipment, nor that wash water can be recycled indefinitely without proper management or disposal.

Our Approach at Sparkling Bins

We prefer to keep it simple. Our systems capture and contain wash water. We educate our customers on responsible wash water management and encourage each to work with their local authorities to establish an approved disposal method. We believe that's what responsible environmental compliance looks like in the real world.

There's also a sanitation point worth noting. Sparkling Bins cleans each customer's bins with fresh, potable water rather than filtering and recirculating the same wash water from bin to bin. In our view, when the goal is to get a bin genuinely clean, starting with fresh water each time is the more sanitary approach.

There's also an equipment consideration that shouldn't be overlooked. Recirculating previously used wash water sends it back through critical components of the cleaning system, including pumps, hoses, valves, fittings, and cleaning heads. Even with filtration, contaminants and fine particles can remain in the water, potentially increasing wear, clogs, and maintenance requirements over time. Depending on the equipment manufacturer and its specifications, damage or premature wear associated with the use of recycled or inadequately filtered water may not be covered under certain manufacturer warranties.

That's another reason Sparkling Bins favors a simpler approach: fresh, potable water passes through the cleaning system, while used wash water is captured and contained for proper disposal rather than being recirculated through the equipment.

We also have firsthand experience with filtration and water-reuse systems, and over the years we've spoken with many operators who use—or have used—some form of filtration in their bin-washing operations. The feedback has been remarkably consistent. While filtration and water reuse may sound attractive in theory, in practice these systems add another layer of complexity. Filters require servicing, additional components need to be monitored and maintained, and the system can become another source of downtime.

That experience, both our own and what we've repeatedly heard from operators in the field, is a major reason we favor a simpler approach. Using fresh, potable water for cleaning and capturing the used wash water eliminates much of the equipment and maintenance required for filtering and recirculating water. The result is a simpler system with fewer components to maintain, less potential downtime, and, in our experience, a lower long-term cost of ownership.

To put it plainly, Part 121 confirms what we've always believed: capturing the water is only step one; an operator must still store it properly and obtain the local sewer authority's written approval for its disposal. That has always been our policy at Sparkling Bins. We've made responsible wash water management and written local approval conditions for getting started a requirement before every business relationship begins, never an afterthought.

So, when comparing systems and hearing the term “EPA compliant,” we encourage you to ask two simple questions:

- **Does the system capture the wash water?**
- **What happens to that wash water afterward?**

Sparkling Bins has designed our equipment around the first question and helps our customers understand their responsibility for the second. We’re happy to answer any questions about how our wash water recovery systems work and to help you identify the questions you should ask your local municipality or wastewater authority before beginning operations.

We also encourage every prospective client to conduct their own research before making a commitment. If you’re considering purchasing a bin-washing system with a filtration system because you’ve been told it’s necessary for EPA compliance, we encourage you to speak directly with owners who have purchased and operated these systems. The filtration system manufacturer should be able to provide a list of clients who have purchased their systems for reference.

Ask them about their real-world experience. Are they still using the filtration system today? How well does it perform in day-to-day operation? Has the filtration system made it any easier for them to legally dispose of their wastewater compared with operating without one? Does it deliver the advantages they expected when they purchased it?

Those are important questions, and the best answers come from operators who have invested their own money in these systems and have used them in the field.

Sparkling Bins supports prospective clients, provides access to experienced operators and industry resources, and stands behind our builds. We don’t believe in using unfounded scare tactics to influence purchasing decisions. We’d rather give you the information and resources you need, encourage you to speak with owners who have firsthand experience, and let you make an informed decision.

Sincerely,

A handwritten signature in blue ink, appearing to read 'John Conway', with a stylized flourish extending to the right.

John Conway

CEO

Sparkling Bins