

MCM #6 Pollution Prevention / Good Housekeeping

MCM Requirement – develop and implement an O&M program that includes a training component and has the ultimate goal of preventing and reducing pollutant runoff from operations, facilities and activities under the control of the permittee. The program must include employee training to prevent and reduce stormwater pollution from activities such as park and open space maintenance, fleet and building maintenance, new construction and land disturbances, and stormwater system maintenance.

BMP #1: Inventory of Operations

1. Identify and document all operations that are owned or operated by the permittee and have the potential for generating pollution in stormwater runoff to the regulated small MS4. This includes activities conducted by contractors for the permittee.
 - a. Activities may include: street sweeping; snow removal/deicing; inlet/outfall cleaning; lawn care; general storm sewer system inspections and maintenance; park and open space maintenance; municipal building maintenance; new construction and land disturbances; right-of-way maintenance; vehicle operation, fueling, washing and maintenance; and material transfer operations, including leaf/yard debris pickup and disposal procedures.
 - b. Facilities can include: streets; roads; highways; parking lots and other large paved surfaces; maintenance and storage yards; waste transfer stations; parks; fleet or maintenance shops; wastewater treatment plants; stormwater conveyances; riparian buffers; and stormwater storage or treatment units.
2. Inventory Timelines
 - a. New Permittees - create an inventory of all operations that may contribute to pollution in stormwater runoff within areas that discharge to the regulated small MS4 by the end of the first year of MS4 permit coverage, and review and update the inventory annually thereafter.
 - b. Existing Permittees - All permittees must review and update the inventory each year of MS4 permit coverage, as necessary.

BMP #2: Written O&M Program

1. Develop, implement and maintain a written O&M program for all operations that could contribute to the discharge of pollutants from the regulated small MS4, as identified under BMP #1. The written O&M program should stress pollution prevention and good housekeeping measures, contain site-specific information, and include the following:
 - a. Management practices, policies, and procedures to reduce or prevent the discharge of pollutants to the regulated small MS4s. The permittee shall consider eliminating maintenance area discharges from floor drains if they have the potential to discharge to storm sewers.
 - b. Maintenance activities, maintenance schedules, and inspection procedures to reduce the potential for pollutants to reach the regulated small MS4s.
 - c. Controls for reducing or eliminating the discharge of pollutants from streets, roads, highways, municipal parking lots, maintenance and storage yards, waste transfer stations, fleet or maintenance shops with outdoor storage areas, salt/anti-skid storage locations, and snow disposal areas. Controls for solid chemical products stored and utilized for the principal purpose of deicing roadways for public safety must be consistent with the BMPs for existing salt storage and distribution sites contained in the PAG-03 NPDES General Permit for Stormwater Discharges Associated with Industrial Activity.
 - d. Procedures for the proper disposal of waste, including dredge spoil, accumulated sediments, trash, household hazardous waste, used motor oil, street sweepings, and other debris.
2. Implementation Timeline
 - a. New Permittees - develop and implement a written O&M program by the end of the first year of General Permit coverage and review and update the program each year thereafter.
 - b. Existing Permittees - All permittees must review and update the written O&M program each year of General Permit coverage, as necessary.

BMP #3: Employee Training Program

1. Develop and implement an employee training program that addresses appropriate topics to further the goal of preventing or reducing the discharge of pollutants from operations to the regulated small MS4. The program may be developed and implemented using guidance and training materials that are available from federal, state or local agencies, or other organizations.
2. All relevant employees and contractors shall receive training (i.e., public works staff, building, zoning, and code enforcement staff, engineering staff, police and fire responders, etc.).
3. Training topics may include operation, inspection, maintenance and repair activities associated with any of the operations identified under BMP #1. Training must cover all relevant parts of the permittee's overall stormwater management program that could affect operations, such as illicit discharge detection and elimination, construction sites, and ordinance requirements.
4. Implementation Timeline
 - a. New permittees shall develop and implement a training program that identifies the training topics that will be covered and what training methods and materials will be used by the end of the first year of General Permit coverage.
 - b. All permittees must review and update the training program each year of General Permit coverage, as necessary.
 - c. Employee training shall occur at least annually and shall be documented in writing and reported in Annual MS4 Status Reports. Documentation shall include the date(s) of the training, the names of attendees, the topics covered, and the training presenter(s).