

# POLLUTION PREVENTION/GOOD HOUSEKEEPING FOR MS4 OPERATIONS

Prepared by INCOG for Stormwater 101:  
Basics of Permits and Regulations,  
September 10, 2013

# Operation and Maintenance

Permit Requirement:

“Develop and implement an operation and maintenance program that includes a training component and has the ultimate goal of preventing or reducing pollutant runoff from MS4 operations;”

# Training

## Permit Requirement:

“Using training materials that you develop or that are available from EPA, the DEQ, or other organizations, your program must include employee training to prevent and reduce storm water pollution from activities such as park and open space maintenance, fleet and building maintenance, new construction and land disturbances, and storm waster system maintenance.”

# Program Description

Your program description must specifically address the following areas:

- (a) “Maintenance activities, maintenance schedules, and long-term inspection procedures for controls to reduce floatables and other pollutants to your SMS4.”

# Program Description

(b) “Controls for reducing or elimination the discharge of pollutants from streets, roads, highways, parking lots, maintenance and storage yards, waste transfer stations, fleet or maintenance shops with outdoor storage areas, and salt/sand storage locations and snow disposal areas you operate.”

# Program Description

(c) “Procedures for the proper disposal of waste removed from your MS4 and your MS4 operations, including dredge spoil, accumulated sediments, floatables, and other debris.”

# Program Description

(d) “Procedures to ensure that new flood management projects are assessed for impacts on water quality and existing projects are assessed for incorporation of additional water quality protection devices or practices.”

# Responsible Parties

“Identify who is responsible for overall management and implementation of your pollution prevention/good housekeeping program and, if different, who is responsible for each of the BMPs identified for this program.”



# Training

## Proposed Requirement:

“You must develop a municipal employee training and education program that you will use to prevent and reduce storm water pollution from MS4 activities. Describe any existing, available materials you plan to use. Describe how this training program will be coordinated with the outreach programs developed for the public information minimum measure and the illicit discharge minimum measure.”

# MS4 Industrial Facilities

## Proposed Requirement:

“You must include a list of industrial facilities you own or operate that are subject to the DEQ Multi-Sector General Permit or individual OPDES or NPDES permits for discharges of storm water associated with industrial activity that ultimately discharge to your SMS4. Include the authorization number or a copy of the Industrial NOI form for each facility. You must review this inventory annually and update as necessary.”

# Inspections

Proposed Requirement:

“You must develop and implement a long-term inspection procedure for structural and non-structural storm water controls (such as swales, retention/detention basin) to reduce floatables and other pollutants discharged from your SMS4, including maintenance activities and schedules.”

# BMPs

## Proposed Requirement:

“You must list and define the BMPs that you or another entity will implement in the program. You must include, as appropriate, the months and years in which you will undertake required actions, including interim milestones and the frequency of the action. Also you must identify who will be responsible for implementing or coordination the BMPs in your program.”

# Use, Storage and Disposal

## Proposed Recommendation:

“Establish procedures for proper use, storage, and disposal of both petroleum and non petroleum products at schools, town offices, police and fire stations, pools, parking garages and other permittee-owned or operated buildings or utilities. Ensure that Spill Prevention Plans are in place.”

# Vehicles and Equipment

Proposed Recommendation:

“Establish procedures for the proper storage of permittee-owned vehicles and equipment, including fueling area. Ensure that vehicle wash waters are not discharged to the SMS4.”

# Vehicle Washing

Don't wash city vehicles where the wash water will flow down a city street into a storm drain.



# Catch Basins

Proposed Recommendation:

“Establish procedures for catch basin inspections, cleaning and repairs, and sweeping streets, sidewalks, and permittee-owned parking lots within the SMS4.”



# Public Events And Litter

This litter will end up in the storm sewer if it isn't collected before the next runoff event.



# Street Litter

This street litter and illegal dumping is headed for the creek.



# Program Evaluation

## Proposed Recommendation:

“Evaluate the appropriateness of your identified BMPs for this minimum control measure. Your evaluation shall verify compliance with permit requirement and, more importantly, documents that tangible efforts have been made towards achieving your identified measurable goals and reducing the impacts of stormwater runoff from the SMS4.”

A vibrant green landscape featuring a large, full-canopied tree in the center. In the foreground, there is a dense patch of purple flowers with large green leaves. The background shows a grassy area, a paved path, and a small pond surrounded by more trees under a clear blue sky.

# Questions?