



Storm Water Phase II Proposed Rule

Pollution Prevention/Good Housekeeping Minimum Control Measure

Storm Water Phase II Proposed Rule Fact Sheet Series

Overview

1.0 – Storm Water Phase II
Proposed Rule Overview

Small MS4 Program

2.0 – Small MS4 Storm Water
Program Overview

2.1 – Who's Covered? Designation
and Waivers of Regulated Small
MS4s

2.2 – Urbanized Areas: Definition
and Description

Minimum Control Measures

2.3 – Public Education and
Outreach Minimum Control
Measure

2.4 – Public Participation/
Involvement Minimum Control
Measure

2.5 – Illicit Discharge Detection and
Elimination Minimum Control
Measure

2.6 – Construction Site Runoff
Control Minimum Control Measure

2.7 – Post-Construction Runoff
Control Minimum Control Measure

2.8 – Pollution Prevention/Good
Housekeeping Minimum Control
Measure

2.9 – Permitting and Reporting:
The Process and Requirements

2.10 – Federal and State-Owned
MS4s: Program Implementation

Construction Program

3.0 – Construction Program
Overview

Industrial "No Exposure"

4.0 – Conditional No Exposure
Exemption for Industrial Activity

This fact sheet is based on the Storm Water Phase II Proposed Rule. Therefore, the information provided herein is subject to change upon publication of the final Phase II rule in November 1999. A revised series of fact sheets will be provided at that time. A comprehensive list of the current fact sheets is in the text box at left.

This fact sheet profiles the proposed Pollution Prevention/Good Housekeeping for Municipal Operations minimum control measure, one of six measures the owner or operator of a Phase II regulated small municipal separate storm sewer system (MS4) would be required to include in its storm water management program to meet the conditions of its National Pollutant Discharge Elimination System (NPDES) permit. This fact sheet outlines the Phase II Proposed Rule requirements and offers some general guidance on how to satisfy them. It is important to keep in mind that the small MS4 owner or operator would have a great deal of flexibility in choosing exactly how to satisfy the minimum control measure requirements.

Why Is Pollution Prevention/Good Housekeeping Necessary?

The Pollution Prevention/Good Housekeeping for municipal operations minimum control measure is a key element of the proposed regulated small MS4 storm water management program. This measure would require that the small MS4 owner or operator examine and subsequently alter their own actions to help ensure a reduction in the amount and type of pollution that (1) collects on streets, parking lots, open spaces, and storage and vehicle maintenance areas and is discharged into local waterways; and (2) results from actions such as environmentally damaging land development and flood management practices or poor maintenance of storm sewer systems.

While this measure is meant primarily to accomplish the goal of improving or protecting the quality of receiving waters by altering the performance of municipal or facility operations, it also can result in a cost savings for the small MS4 owner or operator, since proper and timely maintenance of storm sewer systems can help avoid repair costs from damage caused by age and neglect.

What Is EPA Proposing?

Recognizing the benefits of pollution prevention practices, the proposed rule would require an owner or operator of a regulated small MS4 to:

- Develop and implement an operation and maintenance program with the ultimate goal of preventing or reducing pollutant runoff from municipal operations into the storm sewer system;
- Include employee training on how to incorporate pollution prevention/good housekeeping techniques into municipal operations such as maintenance of parks and open spaces, fleets, buildings, and storm water systems, as well as land development planning. To minimize duplication of effort and conserve resources, the MS4 owner or operator could use training materials that are available from EPA, their State or Tribe, or relevant organizations;
- Determine the appropriate best management practices (BMPs) and measurable goals for this minimum control measure. Some program implementation approaches, BMPs (i.e., the program actions/activities), and measurable goals are suggested below.

What Are Some Guidelines for Developing and Implementing This Measure?

The intent of this control measure is to ensure that existing municipal or facility operations are performed in the most appropriate way as to minimize contamination of storm water discharges.

EPA encourages the small MS4 owner/operator to consider the following components when developing their program for this measure:

- ***Maintenance activities, maintenance schedules, and long-term inspection procedures*** for structural and non-structural controls to reduce floatables and other pollutants discharged from the separate storm sewers;
- ***Controls for reducing or eliminating the discharge of pollutants*** from areas such as roads and parking lots, maintenance and storage yards (including salt/sand storage and snow disposal areas), and waste transfer stations. These controls should include programs that promote recycling (to reduce litter), minimize pesticide use, and ensure the proper disposal of animal waste;
- ***Procedures for the proper disposal of waste*** removed from the separate storm sewer systems and the areas listed in the bullet above, including dredge spoil, accumulated sediments, floatables, and other debris; and
- ***Ways to ensure that new flood management projects assess the impacts on water quality*** and examine existing projects for incorporation of additional water quality protection devices or practices. EPA encourages coordination with flood control managers for the purpose of identifying and addressing environmental impacts from such projects.

The effective performance of this control measure hinges on the proper maintenance of the BMPs used, particularly for the first two bullets above. For example, structural controls, such as grates on outfalls to capture floatables necessitate that the outfalls be cleaned out regularly, while non-structural controls, such as training materials and recycling programs, need to be updated periodically.

What Would Be Appropriate Measurable Goals?

Measurable goals, which would be required for each minimum control measure, are meant to help gauge permit compliance and program effectiveness. The measurable goals, as well as the BMPs, would greatly depend on the needs and characteristics of the owner/operator and the area served by its small MS4. The measurable goals should be chosen using an integrated approach that would fully address the requirements and intent of the minimum control measure. An integrated approach for this minimum measure could include the following measurable goals:

<u>Target Date</u>	<u>Activity</u>
1 year.....	Pollution prevention plan (the new BMPs and revised procedures) completed; employee training materials gathered or developed; procedures in place for catch basin cleaning after each storm and regular street sweeping
2 years.....	Training for appropriate employees completed; recycling program fully implemented
3 years.....	Some pollution prevention BMPs incorporated into master plan; a certain percentage reduction in pesticide and sand/salt use; maintenance schedule for BMPs established
4 years.....	A certain percentage reduction in floatables discharged; a certain compliance rate with maintenance schedules for BMPs; controls in place for all municipal/facility areas of concern

For Additional Information

Contact

- ☞ U.S. EPA Office of Wastewater Management
 - Phone : 202 260-5816
 - E-mail: SW2@epa.gov
 - Internet: www.epa.gov/owm/sw2.htm

Reference Documents

- ☞ Storm Water Phase II Proposed Rule Fact Sheet Series.
 - Contact the U.S. EPA Water Resource Center at 202 260-7786 or at waterpubs@epa.gov
 - Internet: www.epa.gov/owm/sw2.htm
- ☞ Storm Water Phase II Proposed Rule, published on Jan. 9, 1998 in the *Federal Register* (63 FR 1536).
 - Internet: www.epa.gov/owm/sw2.htm