

CHAPTER SIX
POLLUTION PREVENTION/GOOD HOUSEKEEPING PROGRAM
FOR MUNICIPAL OPERATIONS

The Pollution Prevention/Good Housekeeping Program of this SWMP addresses routine activities in the operation and maintenance of drainage systems, roadways, parks and open spaces, and other municipal operations to reduce pollutants entering the storm drain system. This Program includes a training component to prevent and reduce storm water pollution from municipal operations. The BMPs can be separated into two broad categories: source controls and materials management.

Source controls are BMPs designed to prevent or reduce pollutants at the source and include BMPs such as: storm drainage system maintenance, structural floatables controls, secondary containment, street crew training, storm drainage projects, and litter ordinances. Materials management BMPs are designed to reduce pollutants with non-structural controls such as: snow removal/disposal, deicing practices, salt pile management, PHF education, and spill prevention and control.

This program will also be integrated with the Public Education and Outreach, Public Involvement/Participation, and Illicit Discharges and Improper Disposal Programs to promote awareness of water quality concerns in performing routine roadway maintenance and operation, and other practices. The following BMPs describe implementation tasks and assessment tasks to be completed by the City for the Pollution Prevention/Good Housekeeping Program.

SOURCE REDUCTION PROGRAM

Objective: Reduce potential pollutants to all receiving waters by controlling pollutants at the source.

Permit Requirement: II.F.6.a., c. and d. – Pollution Prevention/Good Housekeeping for
Municipal Operations
II.F.1.b. – Public Education and Outreach

Description of Tasks: Source control BMPs are designed to prevent or reduce pollutants at the source. Source control BMPs can be either non-structural or structural controls.

Personnel Training: Provide training for employees 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 water system maintenance.

Plan Review Training: Provide training for personnel who review plans to evaluate storm water controls. Guidelines for appropriate erosion and sediment control measures will be part of this training.

Storm Drain System Maintenance: Maintain existing drainage system operation, including maintenance and cleaning procedures that reduce pollutants in storm water runoff. Identify areas of chronic problems and develop and implement corrective actions for those areas. Implementation of BMPs shall reference appropriate guidance materials. Proper system maintenance will ensure that BMPs are operating effectively.

Review and assess current disposal procedures for waste removed from the storm drain system. Such wastes include dredge spoil, accumulated sediments, floatables, and other debris. Controls for reducing or eliminating the discharge of pollutants from areas such as roads and parking lots, maintenance and storage yards, and waste transfer stations will help to reduce the discharge of pollutants to receiving waters. Personnel training is a component of this program.

Floatables Control Program: Develop a program designed to utilize non-structural and structural controls (where necessary), to reduce the discharge of floatables. Adequate floatables controls will help to reduce the amount and type of pollutants discharged into receiving waters. Current programs to promote recycling and trash removal to minimize floatables in storm water will continue and will be coordinated with the Public Education Program and the Utah County Health Department.

Street Crew Training: Educate public employees regarding pollutants that may be discharged to storm drain system and their potential impacts. Proper training can reduce pollutants from such activities as tack oil application, excess concrete, concrete truck washout, and spill clean-up. Street crew training will occur at least once per permit term. The purpose of the training is to update public employees on storm water issues and to provide a platform for a roundtable discussion on current practices and procedures and how they impact storm water quality.

Storm Drainage Projects: Assess new and existing storm drainage projects with respect to water quality concerns. Incorporate BMPs to reduce storm water pollutants as appropriate.

Goals and Assessment: The table below represents measurable goals for this BMP to be implemented and assessed during the permit term. The purpose of measurable goals is to gauge permit compliance and program effectiveness following the scheduled identified.

| Year | Task/Goal | Assessment | Lead Entity/Funding |
|-------------|--|--|------------------------------------|
| 2003-2005 | Personnel Training/ Train personnel for maintenance activities and new construction and land disturbances | Document number of training sessions and attendees | City Public Works/ General Fund |
| 2004-2005 | Plan Review Training/ Train personnel responsible for plan reviews with regard to storm water | Document number of training sessions and attendees | City Public Works/ General Fund |
| 2003 – | Storm Drain System | Document manhours | City Public Works/ |

CHAPTER SIX
POLLUTION PREVENTION/GOODHOUSEKEEPING PROGRAM

| Year | Task/Goal | Assessment | Lead Entity/Funding |
|---------------|---|--|------------------------------------|
| 2007 | Maintenance/ Maintain system as necessary | allocated to maintenance and cleaning | General Fund |
| 2003– 2007 | Storm Drain System Maintenance/ Assess current waste disposal procedures | Assess current practices | City Public Works/ General Fund |
| 2003- 2007 | Floatables Control Program/ Assess the need for non-structural versus structural controls | Implement appropriate BMPs as recommended | City Public Works/ General Fund |
| 2004- 2005 | Street Crew Training/ Train all personnel regarding water quality impacts from street maintenance | Document training, presentations and attendees | City Public Works/ General Fund |
| 2004- 2005 | Storm Drainage Projects/ Assess storm drainage projects for water quality concerns; implementation of BMPs where appropriate | Document findings | City Public Works/ General Fund |

MATERIALS MANAGEMENT

Objective: Reduce the pollutants reaching the storm drain system by implementing good materials management practices.

Permit Requirement: II.F.6.b.e. and f. – Pollution Prevention/Good Housekeeping for Municipal

Operations

Description of Tasks: Proper management of materials will serve to minimize pollutants entering the storm drain system. BMPs for this program can be either non-structural or structural controls.

Snow Removal and Deicing Practices: The drivers meet in late summer and early fall for training and updating of policies and techniques. Review and assess current snow removal/disposal and deicing practices for prevention and reduction in storm water pollution. Assess location of water quality impacts during operation and determine pollutants of concern. The use of less toxic salt alternatives and appropriate BMPs will be evaluated. Personnel training will be a component of this program.

Salt Pile Management: Proper management of salt piles will help prevent the migration of salts to storm drain systems. Proper operating procedures for truck loading/unloading and materials handling will help to reduce exposure to storm water. Personnel training will be a component of this program. Site inspections will be conducted to evaluate existing controls and procedures. Alternative BMPs will be implemented as appropriate.

Pollution Prevention at Maintenance Yards: Proper pollution prevention measures at equipment yards and maintenance facilities will help to control polluted runoff. Personnel training will be a component of this program. Site inspections will be conducted to evaluate existing controls and procedures. Alternative BMPs will be implemented as appropriate.

Pesticides, Herbicides, Fertilizers Program: Maintain current inventory, evaluate PHF usage on City properties. Current BMPs will be evaluated and implemented as appropriate to reduce the discharge of pollutants related to the application of Pesticides, Herbicides, and Fertilizers (PHFs) applied to public rights-of-way, parks, and other municipal facilities. Assess and evaluate application procedures and rates and implement BMPs to reduce the discharge of pollutants related to these activities. Potential alternative PHFs will be evaluated.

Spill Prevention and Response Program: Participate in the current Spill Prevention and Response Program coordinated through the Utah County Health Department. Maintain personnel on-call to respond to spill reports or discharges. Identify and investigate the source of the discharge and use the regulatory authority to take enforcement actions against violators to correct the illicit discharge activity. This program has established procedures for preventing, containing, and responding to spills that may discharge into the storm drain system. The City Fire Department is equipped to respond to spills, to mitigate spills, and to eliminate the danger to human health. The current program will be evaluated for effectiveness and will be modified as necessary. Personnel training is an important component to this program.

Goals and Assessment: The table below represents measurable goals for this BMP to be implemented and assessed during the permit term. The purpose of measurable goals is to gauge permit compliance and program effectiveness following the schedule identified.

| Year | Task/Goal | Assessment | Lead Entity/Funding |
|-------------|---|---|------------------------------------|
| 2004-2005 | Snow Removal and Deicing/ Assess snow removal/disposal practices and procedures to minimize pollutants from activities | Document current activities, evaluate effectiveness of program and implement any changes determined necessary | City Public Works/ General Fund |
| 2003-2007 | Snow Removal and Deicing/ Train personnel to minimize pollutants from activities | Document training sessions and number of attendees | City Public Works/ General Fund |
| 2004-2005 | Salt Pile Management/ Inspect all City salt storage areas | Document controls in place, potential problems, and corrective measures taken. | City Public Works/ General Fund |
| 2004-2005 | Salt Pile Management/ Observe and document handling procedures | Assess handling operations | City Public Works/ General Fund |

CHAPTER SIX
POLLUTION PREVENTION/GOODHOUSEKEEPING PROGRAM

| Year | Task/Goal | Assessment | Lead Entity/Funding |
|-------------|--|--|---------------------------------------|
| 2003-2007 | Salt Pile Management/ Train personnel once each permit term | Document training sessions and number of attendees | City Public Works/ General Fund |
| 2004-2007 | Pollution Prevention at Maintenance Yards/Develop a SWPPP for equipment and maintenance facilities (2004), maintain SWPPP (2005+) | Document inspections and determine any deficiencies. Document development of SWPPP and maintenance of SWPPP. | City Public Works/ General Fund |
| 2004-2005 | PHF Program/ Evaluate application procedures and rates | Document alternatives investigated and revise program accordingly | City Public Works/ General Fund |
| 2004-2005 | PHF Program/ Maintain current inventory | Document results of inventory tasks | City Public Works/ General Fund |
| 2003-2007 | Spill Prevention and Response/Coordinate spill response with the Utah County Health Department and City Fire Department as necessary | Document response activities and any enforcement actions taken | City Fire Department/ General Fund |