

Pollution Prevention and Good Housekeeping Activities for Municipal Operations

The Municipal Separate Storm Sewer System (MS4) Watershed General Permit, Part I.A.4.b.6), page 17, and Jurisdictional General Permit, Part I.A.10., page 13, requires permittees to implement pollution prevention and good housekeeping activities. The permits contain five topics; each with specific areas that shall be addressed and listed in the Storm Water Pollution Prevention Initiative (SWPPI) or Storm Water Management Program (SWMP). As required for all SWPPI/SWMP actions, each item must include an implementation schedule.

1. Employee/Contractor Training

Existing employees shall be trained prior to the expiration of the permit, while new employees shall be trained during their first year. Specific training for contractors must be done prior to work being performed. All training must include possible impacts to water quality, and pollution prevention through proper management.

2. Structural Storm Water Control Effectiveness

Structural controls shall be inspected and maintained properly so they continue to perform as designed and reduce pollutants to surface waters to the maximum extent practicable. Inspection and maintenance schedules shall be developed, implemented, and identified in the SWPPI/SWMP.

The SWPPI/SWMP shall include a summary list of municipal properties and an estimate of the type and number of structural controls for each. Specifics and location for each shall be available by the first progress report.

The permittee shall develop procedures to dispose of operation and maintenance waste (e.g., dredge spoil, accumulated sediments, floatables) in accordance with Part 111 (hazardous waste), Part 115 (solid waste), and Part 121 (liquid industrial waste). The waste stream from cleaning catch basins is defined as "liquid industrial waste." For specific guidance, see the "Catch Basin Cleaning Activities Guidance Document" at www.michigan.gov/degstormwater. Under "Information" choose "Municipal Program / MS4 Compliance Assistance", then scroll down to "MS4 Compliance Assistance Documents".

When a new structural control is added, it shall be designed, installed, and maintained in accordance with the permittee's post-construction control regulations as well as added to the list and location information.

3. Roadways, Parking Lots, and Bridges

Permittees shall "construct, operate, and maintain its streets, roads, highways, parking lots, and other permittee-owned or operated impervious infrastructure in a manner so as to reduce the discharge of pollutants into the MS4 and the surface waters of the state..."

- a. Permittees shall reduce the runoff of Total Suspended Solids (TSS) from all paved surfaces to the maximum extent practicable.
- b. Permittees shall reduce the discharge of pollutants to the maximum extent practicable from snow removal practices and salt and sand applications. While these are necessary



to protect public safety, there are measures that can be implemented to mitigate the environmental impact.

- c. The permittee shall implement best management practices (BMPs) to control dust and TSS in runoff from unpaved roads and parking lots.
- d. The permittee is prohibited from using coal tar emulsions to seal asphalt surfaces.

4. Fleet Maintenance and Storage Yards

A Storm Water Pollution Prevention Plan (SWPPP) is required for each facility that provides maintenance or storage for three or more vehicles, or that stores significant materials. Significant materials are ANYTHING that may come in contact with storm water and degrade water quality.

A SWPPP contains information, maps, and inspection details that are specific to the individual site, thus the rationale for an individualized SWPPP.

If a permittee has nested jurisdictions it is responsible for those facilities that need to be investigated for SWPPP applicability as well. All SWPPPs shall be retained at the respective facility and be available to staff responsible for storm water management. In addition, the SWPPI/SWMP shall identify all fleet maintenance and storage yards, including the ones for nested jurisdictions, and whether they have a SWPPP or not.

If a SWPPP is not required for any facility, then a simple statement in the SWPPI/SWMP (that a SWPPP is not required due to the lack of such facilities) is all that is necessary. Keep in mind, Department of Natural Resources and Environment staff may determine a SWPPP is necessary upon further investigation or inspection.

A completed SWPPP shall be signed by the facility manager and the certified operator, or program manager, and retained at the facility. The permittee shall also retain on-site the other supporting materials (e.g., log books) required in the SWPPP.

5. Managing Vegetated Property

The permittee shall minimize the discharge of pollutants related to the management of vegetation on land the permittee owns or operates. Permittees shall train employees and contractors on the proper storage, handling, and use of pesticides, herbicides, and fertilizers before they handle them. This should be incorporated with other training as required above.

Storm water impacts must be minimized from all of the permittee's vegetated properties (e.g., golf courses, parks, sports fields, turf and trees on municipal properties or along road rights of way).

Fertilizers with phosphorus may be used only when the soils are tested for nutrients (every four years) and phosphorus is shown to be necessary.