United States Environmental Protection Agency Office of Water (4203)

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# Storm Water Phase II Final Rule

### Pollution Prevention/Good Housekeeping Minimum Control Measure

This fact sheet profiles the Pollution Prevention/Good Housekeeping for Municipal Operations minimum control measure, one of six measures the operator of a Phase II regulated small municipal separate storm sewer system (MS4) is 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 Final Rule requirements and offers some general guidance on how to satisfy them. It is important to keep in mind that the small MS4 operator has 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 small MS4 storm water management program. This measure requires the small MS4 operator to 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 improve or protect receiving water quality by altering municipal or facility operations, it also can result in a cost savings for the small MS4 operator, since proper and timely maintenance of storm sewer systems can help avoid repair costs from damage caused by age and neglect.

#### What Is Required?

 $R^{ecognizing}$  the benefits of pollution prevention practices, the rule requires an 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 park and open space maintenance, fleet and building maintenance, new construction and land disturbances, and storm water system maintenance. To minimize duplication of effort and conserve resources, the MS4 operator can 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.

#### Storm Water Phase II Final Rule Fact Sheet Series

#### Overview

1.0 – Storm Water Phase II Final Rule: An 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

2.4 – Public Participation/ Involvement

2.5 – Illicit Discharge Detection and Elimination

2.6 – Construction Site Runoff Control

2.7 – Post-Construction Runoff Control

2.8 – Pollution Prevention/Good Housekeeping

2.9 – Permitting and Reporting: The Process and Requirements

2.10 – Federal and State-Operated MS4s: Program Implementation

#### **Construction Program**

3.0 – Construction Program Overview

3.1 – Construction Rainfall Erosivity Waiver

#### Industrial "No Exposure"

4.0 – Conditional No Exposure Exclusion for Industrial Activity

## What Are Some Guidelines for Developing and Implementing This Measure?

The intent of this control measure is to ensure that existing municipal, State or Federal operations are performed in ways that will minimize contamination of storm water discharges. EPA encourages the small MS4 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 could 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 separate storm sewer systems and 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, typically need regular cleaning, while non-structural controls, such as training materials and recycling programs, need periodic updating.

#### What Are Appropriate Measurable Goals?

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

#### Target Date Activity

Target Date	Acuvity
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 areas of concern.
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#### **For Additional Information**

#### Contact

- U.S. EPA Office of Wastewater Management
  - Phone: (202) 564-9545
  - Internet: www.epa.gov/npdes/stormwater

#### **Reference Documents**

Storm Water Phase II Final Rule Fact Sheet Series

• Internet: cfpub.epa.gov/npdes/stormwater/swfinal.cfm

Storm Water Phase II Final Rule (64 *FR* 68722)

• Internet: www.epa.gov/npdes/regulations/phase2.pdf