




# CAPCOG Mock Inspection Training

UPPER ALLEN TOWNSHIP

# eMapPA

 **pennsylvania**  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

**eMapPA**

Layers Legend Tasks Links

- ☐ Land Reuse
- ☐ Mining
- ☐ Oil and Gas
- ☐ Radiation
- ☐ Sample Information System
- ☒ Streams and Water Resources
  - ☐ Surface Water Related
  - ☐ Fish Information
  - ☐ Flooding Information
  - ☐ NHD HUC (National Hydrography)
  - ☐ Water Monitoring
  - ☒ Water Quality
    - ☐ 2014 Integrated Report Data
    - ☐ Attaining Streams Assessments
    - ☒ Non Attaining Streams Assessments
      - Approved
      - ... Tentative
  - ☐ TMDL Streams
  - ☐ Existing Use Streams
  - ☐ Existing Use Streams Migrator
  - ☒ Designated Use Streams
    - Cold Water Fish
    - Exceptional Value
    - High Quality
    - Trout Stocking
    - Warm Water Fish

Map eFacts Query Advanced Query

☒ ESRI Streets & Imagery ☐ Topographic ☐ National Geographic

Streets Imagery

**Non Attaining Streams Assessments (2 of 6)**

**Assessment Unit ID:** 8393  
**GNIS Name:**  
**GNIS ID:**  
**Assessed Use:** Aquatic Life  
**Attain Use:** Impaired  
**Source Cause:** Agriculture - Siltation ; Agriculture - Organic Enrichment/Low D.O.  
**Attained:** N  
**ReachCode:** 02050305000589  
**COMID:** 56406015  
**Length Miles:** 0.408228  
**HUC:** 02050305  
**Map Symbology:**  
**Date Created:** 7/15/1997

[Zoom to](#)

Imagery: Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community; ESRI Streets: Sources: Esri, HERE, DeLorme, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), MapmyIndia, NGCC, © OpenStreetMap contributors, and the GIS User Community



# Summary to this Point

- ▶ Important to know where your public works site discharges to and what the status of the receiving waters are
- ▶ Important to inform public works and fire company staff of this information during the trainings required under MCM #6
  - ▶ Strong probability they will be asked during the inspection process

# MCM #6

- ▶ Let's go through the requirements of MCM #6 in detail by examining each of the BMPs

# MCM #6: Pollution Prevention / Good Housekeeping BMP#1

Identify and document all operations that are owned or operated by the permittee and have the potential for generating pollution in stormwater runoff to the regulated small MS4. This includes activities conducted by contractors for the permittee. Activities may include the following:

- ▶ street sweeping; snow removal/deicing; inlet/outfall cleaning; lawn/grounds care; general storm sewer system inspections and maintenance/repairs; park and open space maintenance; municipal building maintenance; new construction and land disturbances; right-of-way maintenance; vehicle operation, fueling, washing and maintenance; and material transfer operations, including leaf/yard debris pickup and disposal procedures. Facilities can include streets; roads; highways; parking lots and other large paved surfaces; maintenance and storage yards; waste transfer stations; parks; fleet or maintenance shops; wastewater treatment plants; stormwater conveyances (open and closed pipe); riparian buffers; and stormwater storage or treatment units (e.g., basins, infiltration/filtering structures, constructed wetlands, etc.).



# MCM #6: Pollution Prevention / Good Housekeeping BMP#2

Develop, implement and maintain a written O&M program for all operations that could contribute to the discharge of pollutants from the regulated small MS4, as identified under BMP #1. This program shall address stormwater collection or conveyance systems within the regulated MS4. The written O&M program shall stress pollution prevention and good housekeeping measures, contain site-specific information, and include the following:

- ▶ Management practices, policies, and procedures shall be developed and implemented to reduce or prevent the discharge of pollutants to the regulated small MS4s. The permittee shall consider eliminating maintenance area discharges from floor drains and other drains if they have the potential to discharge to storm sewers.
- ▶ Maintenance activities, maintenance schedules, and inspection procedures to reduce the potential for pollutants to reach the regulated small MS4s.
- ▶ Controls for reducing or eliminating the discharge of pollutants from streets, roads, highways, municipal parking lots, maintenance and storage yards, waste transfer stations, fleet or maintenance shops with outdoor storage areas, salt / sand (anti-skid) storage locations and snow disposal areas. Controls for solid chemical products stored and utilized for the principal purpose of deicing roadways for public safety must be consistent with the BMPs for existing salt storage and distribution sites contained in the PAG-03 NPDES General Permit for Stormwater Discharges Associated with Industrial Activity.
- ▶ Procedures for the proper disposal of waste, including dredge spoil, accumulated sediments, trash, household hazardous waste, used motor oil, street sweepings, and other debris.

# MCM #6: Pollution Prevention / Good Housekeeping BMP#3

Develop and implement an employee training program that addresses appropriate topics to further the goal of preventing or reducing the discharge of pollutants from operations to the regulated small MS4. The program may be developed and implemented using guidance and training materials that are available from federal, state or local agencies, or other organizations. All relevant employees and contractors shall receive training (i.e., public works staff, building, zoning, and code enforcement staff, engineering staff, police and fire responders, etc.). Training topics shall include operation, inspection, maintenance and repair activities associated with any of the operations identified under BMP #1. **Training must cover all relevant parts of the permittee's overall** stormwater management program that could affect operations, such as illicit discharge detection and elimination, construction sites, and ordinance requirements.

- ▶ Employee training shall occur at least annually and shall be documented in writing and reported in Annual MS4 Status Reports. Documentation shall include the date(s) of the training, the names of attendees, the topics covered, and the training presenter(s).



# Note Regarding Connectivity of the Three BMPs in MCM #6

- ▶ Each BMP is a step wise progression towards determining:
  - ▶ the appropriate facilities and operations to be included (BMP #1)
  - ▶ how to appropriately address these facilities and operations (BMP #2)
  - ▶ and developing the background materials and training appropriate to each staff person (BMP #3)



# Example Plan

- ▶ Now that we know what is required by the permit, let's take a look at an example plan and see if it contains the appropriate level of information:

Activity or Facility	Operation and Maintenance Practice
Highway Garage	Drains inside of building are tied to sanitary sewer system. Vehicle washes and maintenance will be done inside the new building. Salt for roadways is stored inside of building or under tarps to prevent materials form entering MS4. Fueling operation is coded to only allow personnel with keys access. Fuel tanks are inspected on a regular basis, and an automatic shutoff is on system. Emergency information is posted near fueling operation.
Fire Station - A	Drains inside of building are tied to sanitary sewer system. Vehicle washes and maintenance are done inside the new building.
Fire Station - B	Drains inside of building are tied to sanitary sewer system. Maintenance activities are done inside the building.
Tri-County EMS Building	Drains inside of building are tied to sanitary sewer system. Maintenance activities are done inside the building.
Fire Station - C	Drains inside of building are tied to sanitary sewer system.
Municipal Building	Landscaping is maintained around buidling to help reduce stormwater runoff and the overall impervious area of the area.
Street Sweeping	Street sweeping is conducted weekly. The goal of the program is to street sweep all roads four times per year. Materials captured from street sweeping is used as clean fill or properly disposed of.
Deicing	During winter weather, salt is used for deicing on state and Municipal owned roads. Salt use is minimized to the best extent possible to ensure safe roadways. Salt is kept indoors or under tarps to eliminatte any potential for discharging to the MS4 from the storage area.
Inlets / Outfalls	Inlets and outfalls are cleaned as needed based upon complaints, hot spots, or observed issues. Material is used as clean fill or properly disposed of. Inlets are repaired and or replaced during the annual road paving program.
Lawn / Grounds Care	Municipal fields and grassy areas are cut throughout the year to allow plant growth. Bare areas are seeded as needed.
Stormwater Collection Systems	Stormwater collection systems are inspected and cleaned as needed based upon complaints or observed issues. Problems are repaired when discovered. Depending on the problem, Municipal staff may repair or the work may be contracted out.



# Example Plan

- ▶ The above plan is not detailed enough for MCM #6 BMP #2 requirements
- ▶ The following spreadsheet utilizes the example of the Highway Garage above but provides detail that works to incorporate aspects of MCM #6 BMPs #2 and #3

# Inspections

- ▶ Two different levels of inspections
  - ▶ PA DEP
  - ▶ EPA



# Questions

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