

## **8.0 MCM #5 - Pollution Prevention/Good Housekeeping for Municipal Operations**

The Pollution Prevention/Good Housekeeping minimum control measure consists of BMPs that focus on training and on the prevention or reduction of pollutant runoff from municipal operations. Municipal operations that are subject to operation and maintenance programs include park and open space maintenance, street and road maintenance, fleet and building maintenance, stormwater system maintenance, new construction and land disturbances, municipal parking lots, vehicle and equipment maintenance and storage yards, waste transfer stations and salt/sand storage locations. The BMPs describe the specific maintenance activities, schedules and long term inspection procedures for controls to reduce floatables and other pollutants from municipal operations; employee training program to prevent and reduce stormwater pollution from municipal operations; procedures for the proper disposal of waste removed from the MS4; structural control maintenance programs and developing a list of the municipally-owned industrial facilities which require other stormwater discharge permits.

### **8.1 Regulatory Requirements**

A section within the SWMP must be developed to establish an operation and maintenance program, including an employee training component that has the ultimate goal of preventing or reducing pollutant runoff from municipal operations.

#### **I. Good Housekeeping and Best Management Practices (BMPs)**

Housekeeping measures and BMPs (which may include new or existing structural and non-structural controls) must be identified and either continued or implemented with the goal of preventing or reducing pollutant runoff from municipal operations. Examples of municipal operations and municipally owned areas include, but are not limited to:

- (1) park and open space maintenance;
- (2) street, road, or highway maintenance;
- (3) fleet and building maintenance;
- (4) stormwater system maintenance;
- (5) new construction and land disturbances.
- (6) municipal parking lots;
- (7) vehicle and equipment maintenance and storage yards;
- (8) waste transfer stations; and
- (9) salt/sand storage locations.

#### **II. Training**

A training program must be developed for all employees responsible for municipal operations subject to the pollution prevention/good housekeeping program. The training program must include training materials directed at preventing and reducing stormwater pollution from municipal operations. Materials may be developed, or obtained from the EPA, states, or other organizations and sources. Examples or descriptions of training materials being used must be included in the SWMP.

#### **III. Structural Control Maintenance**

If BMPs include structural controls, maintenance of the controls must be performed at a frequency determined by the MS4 operator and consistent with maintaining the effectiveness of

the BMP. The SWMP must list all of the following:

- (1) maintenance activities;
- (2) maintenance schedules; and
- (3) long-term inspection procedures for controls used to reduce floatables and other pollutants.

IV. Disposal of Waste

Waste removed from the MS4 and waste that is collected as a result of maintenance of stormwater structural controls must be properly disposed. A section within the SWMP must be developed to include procedures for the proper disposal of waste, including:

- (1) dredge spoil;
- (2) accumulated sediments; and
- (3) floatables.

V. Municipal Operations and Industrial Activities

The SWMP must include a list of all:

- (1) municipal operations that are subject to the operation, maintenance, or training program developed under the conditions of this section; and
- (2) municipally owned or operated industrial activities that are subject to TPDES stormwater regulations.

VI. Storm Sewer Operation and Maintenance Activities

- (1) storm sewer system cleaning; and
- (2) identification and prioritization of problem areas for increased inspection.

VII. Program to Reduce Pollutant discharge from Roads

- (1) street sweeping and cleaning.

VIII. Mapping of permittee-owned and operated facilities

IX. Facility Assessments for Pollutant Discharge Potential

- (1) identification of high priority facilities; and
- (2) documentation of assessment results.

X. Facility Specific SOPs

- (1) SOPs for high priority facilities to be available to TCEQ, kept on site when possible, and updated as necessary.

XI. Stormwater Controls for High Priority Facilities

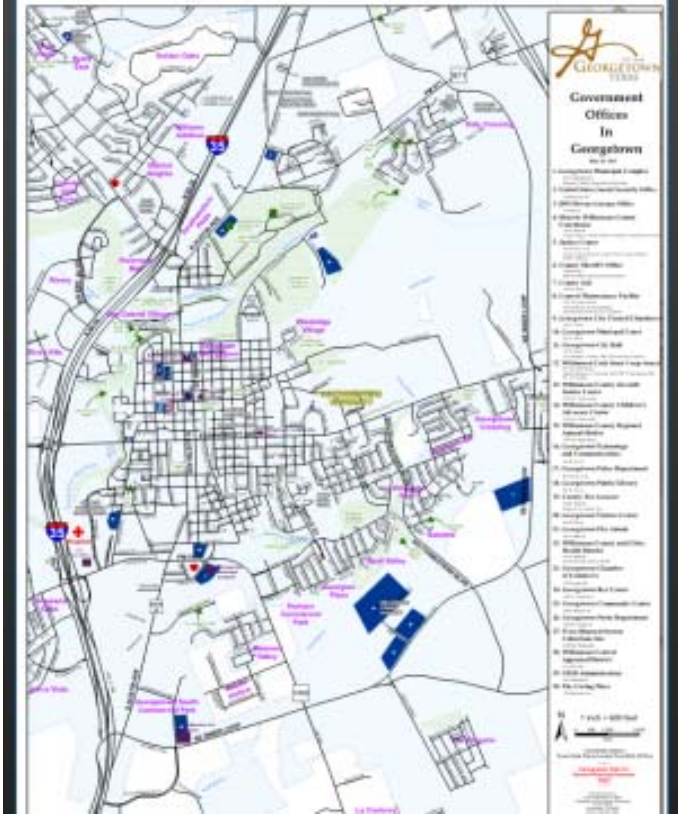
- (1) provide shelter for exposed material with pollutant potential;
- (2) spill prevention and control SOP's for vehicle fueling and maintenance activities; and
- (3) SOPs for vehicle washing activities.

XII. Inspections

- (1) Inspection program for high priority permittee-owned facilities.

## 8.2 Selected Best Management Practices


### GH-1 Permittee-Owned Facilities and Control Inventory

GH-1	Permittee-Owned Facilities and Control Inventory		
	<p><b>BMP Description:</b></p> <p>The City will update the City's maps to include City owned facilities and controls.</p>		
<p><b>Responsible Department</b> Planning</p>	<p><b>Target Audience</b></p>	<p>Public service employees</p>	
<p><b>Supporting Departments</b></p> <p>GUS Sys. Eng. GUS – UTIL Transportation Police-Code Parks</p>	<p><b>Year</b></p>	<p><b>Measurable Goal</b></p>	
	<p>1</p>	<p>Review completeness of current mapping of City owned facilities and stormwater controls</p>	
	<p>2</p>	<p>Acquire additional data needed. Develop procedures for updating</p>	
	<p>3</p>	<p>Maintain/update database and maps</p>	
	<p>4</p>	<p>Maintain/update database and maps</p>	
	<p>5</p>	<p>Maintain/update database and maps</p>	


**GH-2 Staff Training and Reporting**

GH-2	Staff Training and Reporting		
		<p><b>BMP Description:</b></p> <p>The City will develop and implement staff training for procedures, regulations and policies.</p>	
<b>Responsible Department</b> Transportation	<b>Target Audience</b>	Public service employees	
<b>Supporting Departments</b>  GUS Sys. Eng. Human Resources	<b>Year</b>	<b>Measurable Goal</b>	
	<b>1</b>	Continue current training programs	
	<b>2</b>	Identify departments and staff requiring stormwater training	
	<b>3</b>	Acquire, develop, or support the development of training curriculum	
	<b>4</b>	1 training for new employees, list of attendees / dates	
	<b>5</b>	1 training for new employees, list of attendees / dates	

**GH-3 Contractor Oversight**



GH-3		Contractor Oversight	
		<p><b>BMP Description:</b></p> <p>The City will Develop standard contract language and ensure all appropriate future contracts and updates contain language requiring contractor compliance.</p>	
<p><b>Responsible Department</b> Transportation</p>		<p><b>Target Audience</b></p>	<p>Public service employees</p>
<p><b>Supporting Departments</b></p> <p>GUS Sys. Eng. Finance</p>	<b>Year</b>	<b>Measurable Goal</b>	
	1	Review existing standard contract language related to minimizing stormwater pollutants	
	2	Incorporate standard pollution control requirements into standard contract	
	3	Require use of revised standard contract	
	4	Require use of revised standard contract	
	5	Require use of revised standard contract	

**GH-4 Street Sweeping**



GH-4	Street Sweeping		
		<p><b>BMP Description:</b></p> <p>The City will continue sweeping public streets and high priority facilities, document disposal procedure. The City will continue the Street Sweeping Program to reduce the amount of sediment and associated pollutants discharged to the City's MS4 from roadways. The City has a street inventory to identify the streets that will be swept throughout the year. Residential streets are swept once every four months and arterial streets are swept once every four weeks; and additional sweeping services are performed as needed for accidents, citizen requests, special events or leaf collection. The City will ensure street sweeping procedures include proper disposal of waste.</p>	
<b>Responsible Department</b> Transportation	<b>Target Audience</b>	Public service employees	
<b>Supporting Departments</b>  GUS Sys. Eng. GUS Util.	<b>Year</b>	<b>Measurable Goal</b>	
	1	Identify priority streets and schedule. Monthly reports on lane miles swept. Sweep 5,000 lane miles	
	2	Monthly reports of lane miles swept, sweep 5,000 lane miles	
	3	Monthly reports of lane miles swept, sweep 5,000 lane miles	
	4	Monthly reports of lane miles swept, sweep 5,000 lane miles	
	5	Monthly reports of lane miles swept, sweep 5,000 lane miles	



**GH-5 Inlet Drain and Structure Cleaning**


GH-5	Inlet Drain and Structure Cleaning		
 		<p><b>BMP Description:</b></p> <p>The City will continue system cleaning, develop a list of potential problem areas and prioritize problem areas for increased inspection (for example, areas with recurrent illegal dumping). The City will ensure cleaning procedures include proper disposal of waste.</p>	
<p><b>Responsible Department</b> GUS-Sys. Eng.</p>	<p><b>Target Audience</b></p>	<p>Public service employees</p>	
<p><b>Supporting Departments</b></p> <p>Transportation GUS- Env.</p>	<p><b>Year</b></p>	<p><b>Measurable Goal</b></p>	
	<p><b>1</b></p>	<p>Continue cleaning activities</p>	
	<p><b>2</b></p>	<p>Continue cleaning activities. Identify problem areas and develop prioritized list. Develop tracking system</p>	
	<p><b>3</b></p>	<p>Annual reports on cleaning activities, meet inlet and culvert goals</p>	
	<p><b>4</b></p>	<p>Annual reports on cleaning activities, meet inlet and culvert goals</p>	
	<p><b>5</b></p>	<p>Annual reports on cleaning activities, meet inlet and culvert goals</p>	

**GH-6 Facility Assessments and SOPs**



GH-6		Facility Assessments and SOPs	
 		<p><b>BMP Description:</b></p> <p>The City will assess City owned facilities to determine which ones have a high potential to release pollutants. The City will prepare Standard Operating Procedures (SOPs) specific to each identified high priority facility. The City will ensure SOPs address removal and proper disposal of waste.</p>	
<p><b>Responsible Department</b> GUS-Sys. Eng.</p>		<p><b>Target Audience</b></p>	<p>Public service employees</p>
<p><b>Supporting Departments</b></p> <p>Transportation GUS- Env.</p>		<b>Year</b>	<b>Measurable Goal</b>
		1	Assess 3 facilities
		2	Prepare SOP for Parks Administration/Animal Shelter
		3	Prepare SOP for Recreation Center and Pools
		4	Prepare SOP for Municipal Complex
		5	None




**GH-7 Licensed Applicators**

GH-7		Licensed Applicators	
		<p><b>BMP Description:</b></p> <p>To reduce water quality impacts from fertilizers and pesticides, maintain licensed applicators by the Texas Department of Agriculture with annual training and certification on proper storage and application techniques.</p>	
<b>Responsible Department</b> Parks		<b>Target Audience</b> Public service employees	
<b>Supporting Departments</b>  Police Fire	<b>Year</b>	<b>Measurable Goal</b>	
	1	Copies of licenses	
	2	Copies of license renewals for annual report	
	3	Copies of license renewals for annual report	
	4	Copies of license renewals for annual report	
	5	Copies of license renewals for annual report	



**GH-8 Municipal Complex Improvements**

GH-8		Municipal Complex Improvements	
<div></div>		<p><b>BMP Description:</b></p> <p>Based on initial assessment of City-owned facilities, the City will install improvements at the Municipal Complex Facility.</p>	
<p><b>Responsible Department</b> GUS-Sys. Eng.</p>		<p><b>Target Audience</b>  Public service employees</p>	
<p><b>Supporting Departments</b></p> <p>Transportation GUS- Env.</p>	<p><b>Year</b></p>	<p><b>Measurable Goal</b></p>	
	<p>1</p>	<p>Install speed bump around fleet vehicle car wash</p>	
	<p>2</p>	<p>None</p>	
	<p>3</p>	<p>None</p>	
	<p>4</p>	<p>Install asphalt speed bump downstream of transformer storage area</p>	
	<p>5</p>	<p>Provide cover over scrap metal storage</p>	

**GH-9 Parks Facility Improvements**

GH-9	Parks Facility Improvements		
		<p><b>BMP Description:</b> Based on initial assessment of City-owned facilities, the City will install improvements at the Parks Administration complex.</p>	
<b>Responsible Department</b> Parks	<b>Target Audience</b>	Public service employees	
<b>Supporting Departments</b>  Finance-Facilities GUS- Env.	<b>Year</b>	<b>Measurable Goal</b>	
	1	Install containment around soil, mulch and crushed granite storage area	
	2	None	
	3	None	
	4	None	
	5	Evaluate adoption of Integrated Pest Control techniques	

**GH-10 Pool Facility Improvements**

GH-10		Pool Facility Improvements	
<div></div>		<p><b>BMP Description:</b></p> <p>Based on initial assessment of City-owned facilities, the City will install improvements at various pool facilities.</p>	
<p><b>Responsible Department</b> GUS-Sys. Eng.</p>		<p><b>Target Audience</b> Public service employees</p>	
<p><b>Supporting Departments</b></p> <p>Parks GUS- Env. Finance</p>	<p><b>Year</b></p>	<p><b>Measurable Goal</b></p>	
	<p>1</p>	<p>Switch from hypochlorite to PPB tabs at pools</p>	
	<p>2</p>	<p>Install overhead cover over equipment at Recreation Center</p>	
	<p>3</p>	<p>Install overhead cover over equipment at River Ridge Pool</p>	
	<p>4</p>	<p>Install overhead cover over equipment at the Village Pool</p>	
	<p>5</p>	<p>Install overhead cover over equipment at Williams Pool</p>	