# Good Housekeeping Workshops

Merrimack Valley Stormwater Collaborative



# Workshop 2 – Buildings, Facilities, Vehicle and Equipment Maintenance

March 20, 2015

Anne Kitchell, Gary Hedman, and Ellie Baker Horsley Witten Group, Inc.



# **Good Housekeeping Workshop Agenda**

Workshop 1 – Parks & Recreation Areas
Tuesday, March 10, 2015 (8 - 11:00 AM)
Snow date: Thursday, March 12, 2015
Northern Essex Community College Classroom

Workshop 2: Buildings, Facilities, Vehicle and Equipment Maintenance Friday, March 20, 2015 (8 - 11:00 AM) Andover Public Safety Building and Public Works Maintenance Yard

Workshop 3: Stormwater Management and Infrastructure Maintenance Friday, April 10, 2015 (8 - 11:00 AM) Northern Essex Community College – Classroom

- Introduction
- Water quality, regulations, and municipal facilities
- Field Trip- Andover DPW
- Pollution prevention practices and SWPPs
- Spill Prevention
   Measures and SPCCPs
- Opportunities for Regional Efficiencies
- Wrap up

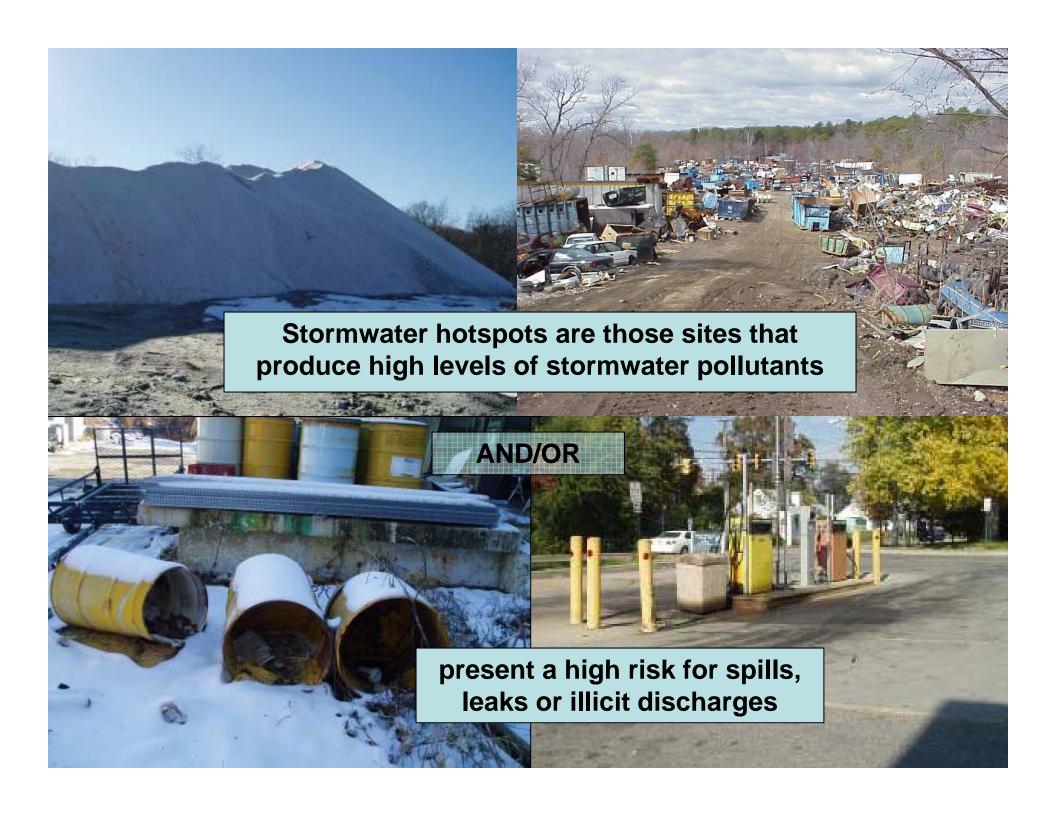




# Some municipal operations that can impact stormwater quality

- Municipal Hotspot Facility
   Management
- Municipal Construction Projects
- Street Repair and Maintenance
- Street Sweeping
- Storm Drain Repair/Maintenance
- Landscape & Park Maintenance
- Stormwater BMP Maintenance
- Municipal Employee Training





## Do you know your municipal stormwater hotspots?

- 1. How many hotspot facilities are located in your community?
- 2. Have all hotspots been the subject of an on-site investigation?
- 3. Have pollution prevention measures been implemented?

- Public Works Yards
- Vehicle/Equipment Storage
- Maintenance Yards
- Water and Wastewater
   Treatment Facilities
- Landfills
- Solid Waste Handling and Transfer Facilities
- Composting Facilities
- Public Buildings (Schools, Libraries, Police and Fire Departments)
- Public Parks
- Public Golf Courses
- Public Swimming Pools



Table 4: Pollution Generating Activities and Stormwater Pollutants Associated
with Municipal Operations

Pollution	Stormwater Pollutants					
Generating Activity	Sediment	Nutrients	Metals	Hydro- carbons	Toxins	Others
	Hotspot Facility Management					
Vehicle Repair	0	0	•	•	•	
Vehicle Fueling	×	0	•	•	•	
Vehicle Washing	•	•	•	•	•	
Vehicle Storage	0	×	•	•	0	Trash
Outdoor Loading	•	•	•	0	0	Organic Matter
Outdoor Storage	•	•	•	•	•	Chloride
Waste Management	0	•	•	•	•	Trash, bacteria
Building Repair	•	0	•	•	•	
Building Maintenance	•	×	•	0	•	
Parking Lot Maintenance	•	0	•	•	•	Chloride
Turf Management	•	•	X	X	•	Pesticides bacteria
Landscaping	0	•	X	X	•	Pesticides Pacteria
Swimming Pool Discharges / Fountains	×	×	×	×	×	Chlorine, bacteria

#### Key

X= not associated with operation

= frequently associated with operation

• = infrequently associated with operation

○ = rarely associated with operation

Source: Municipal Pollution Prevention/ Good Housekeeping Practices (CWP, 2008)

#### Sand

- plugged storm drains, which can cause flooding
- fill in aquatic habitats, and cloud waterbodies
- Oils, metals,etc
  - Toxic

#### Salt

- highly soluble in water and no BMPs to easily remove it
- deteriorated paved surfaces and infrastructure
- vegetation dieback and effects on metabolic processes of aquatic biota.
- groundwater contamination, trace metal leaching, changes to soil composition
- poor vertical mixing in ponds





# Chloride concentrations measured in the Chesapeake Bay Region

Runoff, Salt storage areas	50,000 to 80,000 mg/l
Highway melt-water runoff	5000 to 15,000 mg/l
Snow piles in parking lots	2000 to 4000 mg/l
Street melt-water runoff	2000 to 4000 mg/l
Urban streams in winter	1500 to 3000 mg/l
Urban streams in summer	50 to 400 mg/l
Normal Freshwater	20 to 50 mg/l
Chesapeake Bay	1000 to 10,000 mg/l
Mouth of Chesapeake	20,000 to 30,000 mg/l
Ocean Water	30,000 to 36,000 mg/1

http://chesapeakestormwater.net/2009/01/winter-road-salt-and-the-chesapeake-bay/

## Why do we care about Pollution Prevention?

- Prevention is more cost-effective than mitigation/restoration
- Our stormwater BMPs can't do all the work
- Helps reduce liability and future maintenance/clean up burden
- Minimizes health risks to residents and workers
- It is required:
  - Municipal Separate Storm
     Sewer System (MS4) Program
  - RCRA, Hazardous materials and spill response regulations







## MS4 Permit Requirements For Pollution Prevention / Good Housekeeping in Municipal Operations

### 2003 Permit

- Develop and implement a program with the goal of preventing and/or reducing pollutant runoff from municipal operations
- Include an employee training component
- Include maintenance activities for parks and open space, playing fields, fleet maintenance, building maintenance
- Develop schedules for maintenance activities
- Develop inspection procedures and schedules for structural controls



# MS4 Permit Requirements 2.3.7 for Pollution Prevention / Good Housekeeping Control Measures

### 2014 Draft

- Inventory all facilities by end of Permit Yr 1
- Develop written O&M procedures by end of Permit Yr 1:
  - Parks and Open Space (Workshop 1)
  - Buildings and Facilities
  - Vehicle and Equipment Maintenance
  - Stormwater Infrastructure (Workshop 3)
- Implement specific (minimum) activities and schedules
- Develop Stormwater Pollution Prevention Plans (SWPPPs) for certain facilities (with inspection and record keeping requirements)
- Includes additional requirements for TMDL or impaired waters



#### 2014 Draft Permit:

### O&M Program for buildings and facilities 2.3.7(a)(ii)(b)

### Applicable sites:

- Permittee-owned or operated
- Where pollutants are exposed to stormwater
- Includes usual suspects <u>plus</u>
   schools, town offices, police,
   fire, parking garages, and
   pools
- Parking lot and building housekeeping measures

#### Permittees must:

- Evaluate use, storage, and disposal of petroleum products & other potential stormwater pollutants
- Provide employee training
- Ensure that Spill Prevention Plans are in place and coordinate with Fire Department, if applicable
- Develop management procedures for dumpsters and other waste equipment
- Sweep parking lot and areas surrounding facility





#### 2014 Draft Permit:

### O&M Program for vehicles and equipment 2.3.7(a)(ii)(c)

### Permittees are required to:

- Establish procedures for vehicle storage
  - Vehicles with fluid leaks to be stored indoors or contained until repaired
- Evaluate permittee-owned or operated fueling areas
  - If possible, place under cover
- Establish vehicle washing procedures
  - Eliminate discharge of wash waters to storm drain or surface waters
  - These discharges are not authorized by this permit.







# Related items at individual facilities 2014 Draft Permit: Infrastructure O&M 2.3.7(a)(iii)

### Permittees are required to:

- (b) Clean catch basins
  - 50% capacity threshold
  - Optimization/increased frequency where needed
  - Maintenance logs- quantity of material removed
- (c) Sweep streets/parking areas 1/yr (more in target pollutant areas)
- (d) Properly store catch basin cleanings/sweepings prior to disposal
- (e) Procedures for salt storage/useage
- (f) Stormwater drain/BMP inspection and maintenance



Workshop 3: Stormwater
Management and Infrastructure
Maintenance

Friday, April 10, 2015 (8 - 11:00 AM)

Northern Essex Community College –

Classroom



# 2014 Draft Permit: Stormwater Pollution Prevention Plans (SWPPPs) 2.3.7(b)

### Develop and implement SWPPP for each facility

- maintenance garages , public works yards, transfer station, and other waste handling facilities where pollutants are exposed to stormwater
- If multiple facilities on same property, can develop one SWPPP
- Not needed if already under a Multi-Sector General Permit
- (i) Completed by end of Permit Yr 2
- (ii) Include specific elements and measures
- (iii) Conduct quarterly site inspections (once during rain event)
- (iv) Keep written records of maintenance, inspections and trainings



## Components of a SWPPP 2.3.7(b)(ii)

### **Elements of the SWPPP**

- (a) Pollution Prevention Team
  - Names, titles, roles
- (b) Description of facility & pollution source identification
  - Map with location of outfalls, receiving waters, floor drains, controls, etc
- (c) Identification of Stormwater Controls
  - Including measures to control off-site run-on
  - Address pollutants of concern
- (d) Management Practices

#### Management practices to include

- 1. Minimize / prevent exposure
- 2. Good housekeeping
- 3. Preventative maintenance
- 4. Spill prevention and response
- Erosion and sediment control
- 6. Management of runoff
- 7. Salt storage piles (enclose or cover by YR2, minimize exposure during transfer)
- 8. Employee training (annual)
- Maintenance of control measures

# Survey Says...

Vehicle refueling/fuel storage locations	
DPW yard	8
Separate Parks Dept	1
Outside provider	4
Type of Fuel Stored	
Unleaded	4
Diesel	9
Propane/Natural Gas	0
Fuel Oil	1
Storage Type	
UST Storage capacity	5
AST Storage capacity	6
Existing compliance items for	
DPW/Maintenance yards	
SPCCP	7
SWPPP	4
Annual Tier 2 Reporting	4
UST Operator (Class A/B/C)	2

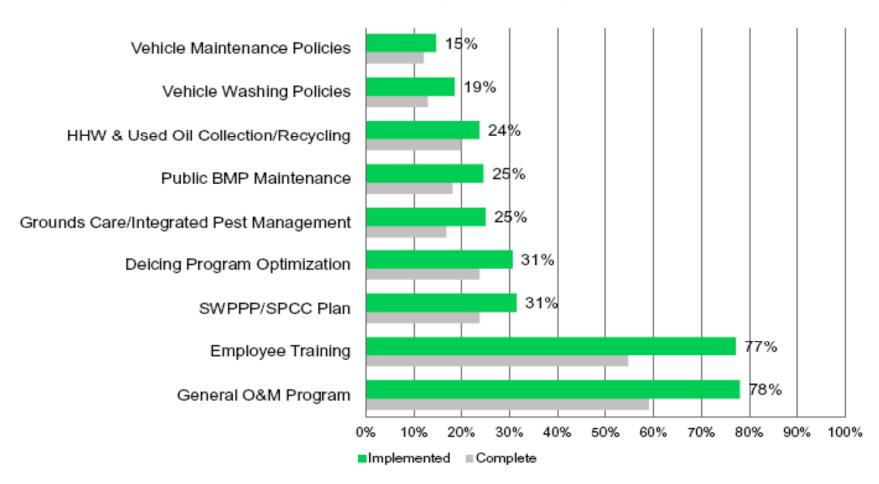
Where does vehicle / equipment	n=10
washing occur?	
DPW/ Maintenance yard (discharge	
to ground surface or stormwater	
drain)	9
Vehicle wash rack (discharge to tight	
tank or sewer)	0
Outside of building	1
Other	1

Are there existing programs/ procedures in place for the following?	n=10
Storage of materials	2
Refueling	1
Fleet washing facilities	1
Salt storage	3

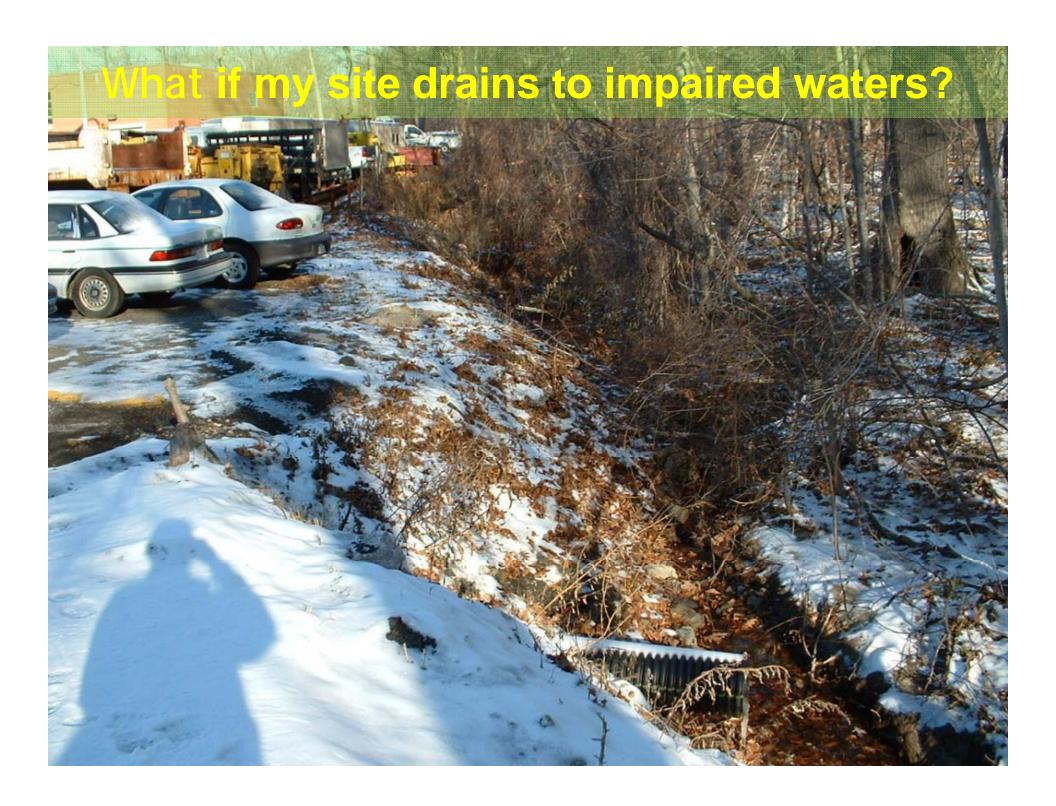


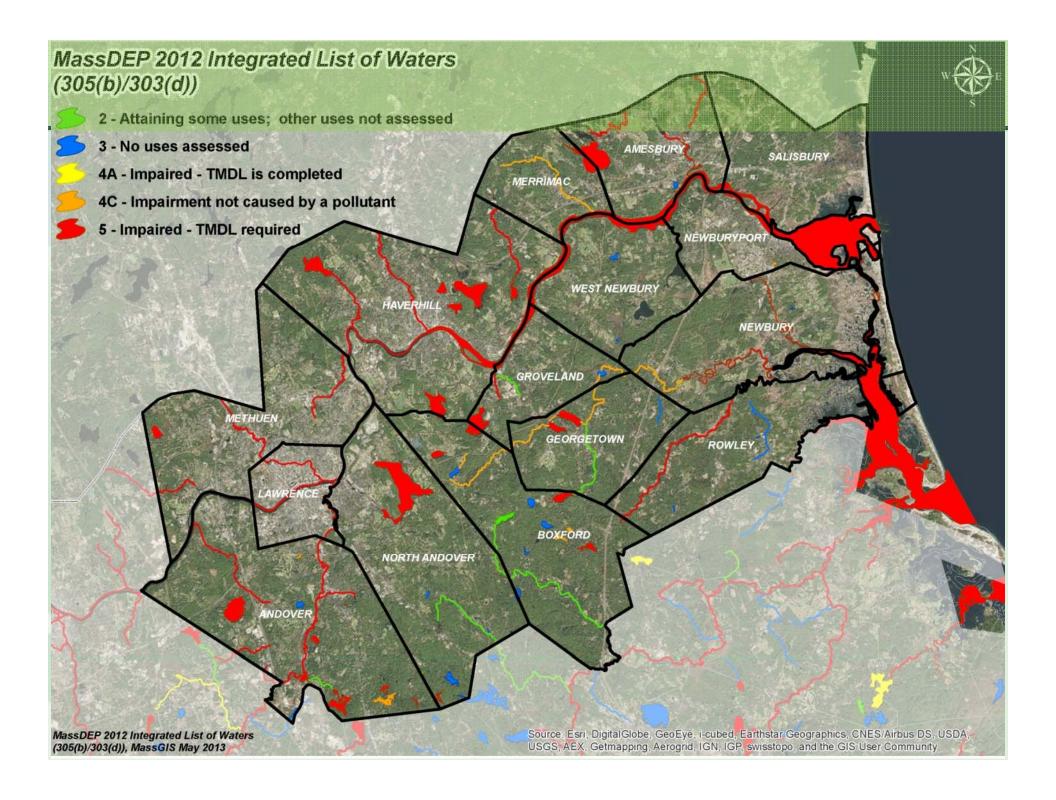
### **EPA 2011-2012 Annual Report Summary (232 of 238 MS4s)**

# Pollution Prevention and Good Housekeeping BMPs (MCM6)



Percent reporting the use and completion of practice among the 97% of MA municipalities reporting





# Enhanced PP/GH measures for impaired waters (Appendix F and H)

#### **Nutrients**

- Use of slow release fertilizer (nitrogen impaired)
- Procedures to manage grass clippings and leaf litter, including prohibiting blowing of organic waste onto impervious cover
- Increased street-sweeping frequency (2x/yr spring and fall)
- Other
  - Targeted residential education on fertilizer, organic waste management, pet waste
  - Stormwater BMPs optimized for nutrient removal

### Bacteria/pathogens

- No additional PPP
- Other
  - Public education focus on pet waste and septics
  - Outfall catchments prioritized under IDDE program

#### Metals

- increased sweeping freq. in high priority areas
- Potential for increased catch basin cleaning to target high pollutant loads

# Enhanced PP/GH measures for impaired waters

#### Chloride

- Salt Reduction Plan (5YR to fully implement)
- 2. Track salt type and amount used
- 3. Operational changes, equipment changes, training, guidelines for application rate
- Address privately-owned facilities
  - Ordinance to prevent stockpile exposure private applicators
  - Annual educ. message on proper storage and application rates

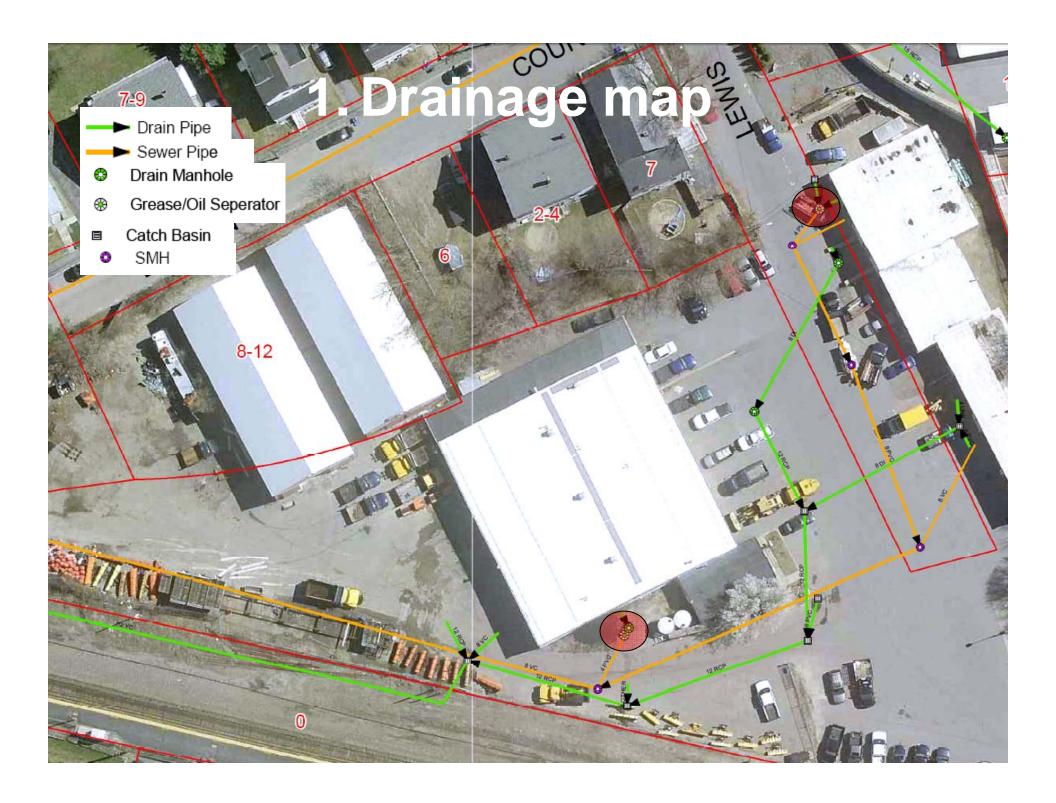
- Prewetting, pretreating stockpile, increased plowing, monitoring road surface temp.
- Equipment upgrades to provide better calibration or pre-wetting capabilities
- Training of staff and contractors
- Winter Parking Lot and Sidewalk Maintenance Manual (2008);
   Operator Field Handbook (2012)
- Regular calibration of spreading equipment
- Designation of no/low salt zones
- Measure to prevent stockpile exposure
- Estimates on total tonnage of salt reduction expected

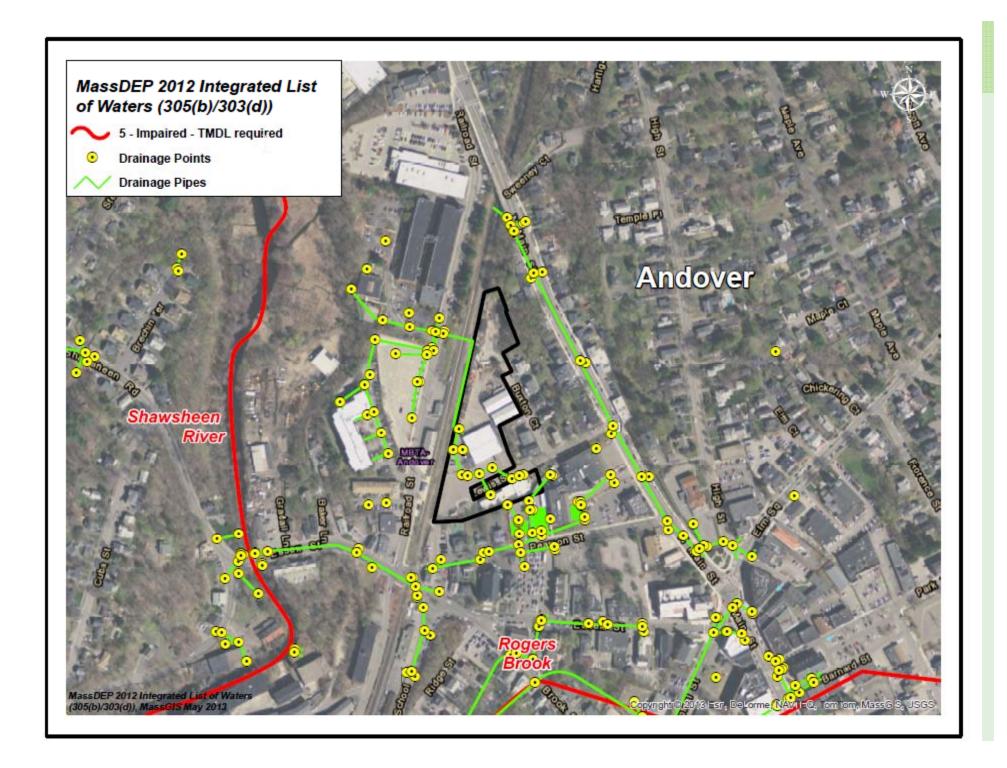


## **Small Group Walkabout**

- Break into 6 groups (see # on name tag)
- Grab handout/clipboard.
- Walk to site.
- 30 minutes to evaluate site:
  - 1. Map the drainage network (inlets, BMPs, discharge point) and note surface drainage patterns
  - 2. Mark locations of potential pollutants
    - Type
    - Pollution prevention measure used, or what is needed
  - 3. Identify best or most innovative measure observed at the site.
  - 4. What is the most challenging pollutant/feature of the site?







Q

The Free Encyclopedia

# **Causes of Impairment**

#### Shawsheen River

Article Talk

From Wikipedia, the free encyclopedia

Coordinates: ( 42.7053°N 71.1403°W

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The Shawsheen River in Billerica

The Shawsheen River is a 26.7-mile-long (43.0 km)[1] tributary of the Merrimack River in northeast Massachusetts. The name has had various spellings. According to Bailey's history of Andover, the spelling Shawshin was the most common in the old records, although Shawshine, Shashin, Shashine, Shashene, Shawshene, and later, Shawsheen, are found. The name, says Bailey, is said to mean "Great Spring".[2]

The river runs generally northward through the

towns of Bedford, Billerica, Wilmington, Tewksbury, Andover, and Lawrence, where it joins the Merrimack. Like its parent, the river has played an important role in the development of the area, including industrial development, with many mills built to take advantage of the



#### Causes of Impairment for Reporting Year 2010

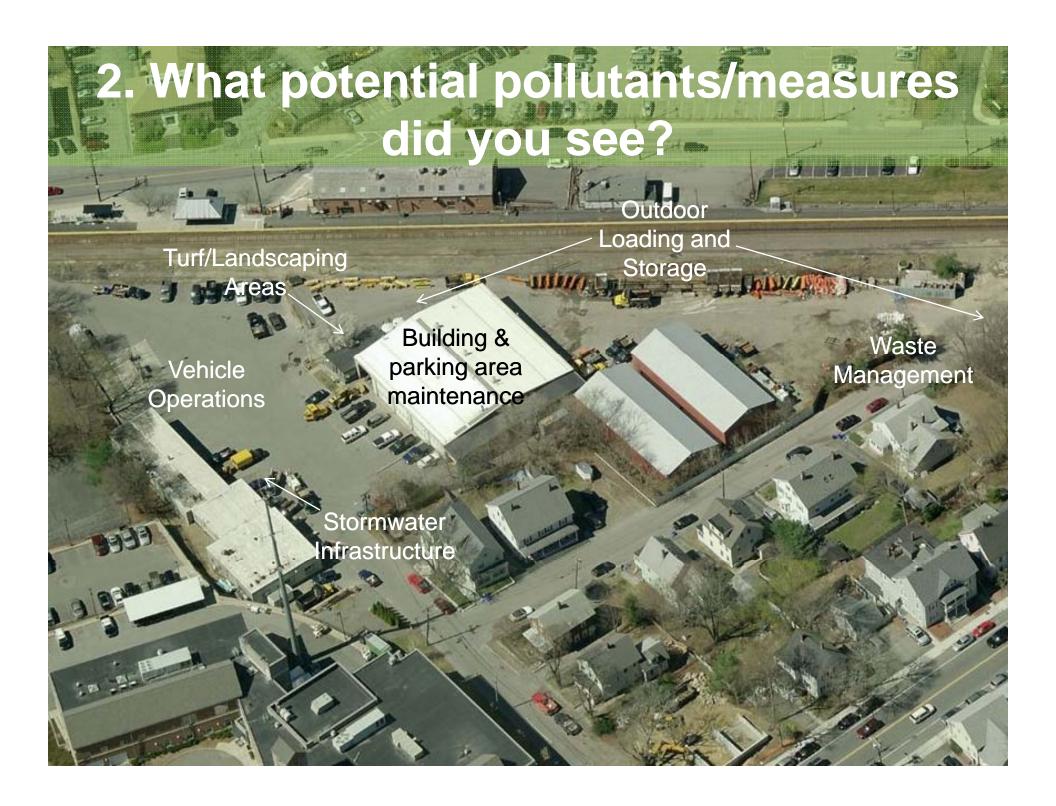
#### Description of this table

Cause of Impairment	Cause of Impairment Group	State TMDL Development Status
Dissolved Oxygen	Organic Enrichment/Oxygen Depletion TMDL needed	
Fecal Coliform	al Coliform Pathogens TMDL completed	

References [edit]

A U.S. Geological Survey. National Hydrography Dataset high-resolution flowline data. The

Shawsheen River



## **PP/GH control measures**

## 3. What was your favorite PP/GH?

Table 4: Pollution Prevention/Good Housekeeping Practices Commonly Used to Control Stormwater Pollution at Municipal Hotspot Facilities		
Hotspot Activity	Pollution Prevention/Good Housekeeping Practices	
Vehicle Maintenance and Repair	Drip pans, tarps, covered outdoor storage areas, secondary	
Vehicle Fueling	containment, discharge of washwater to sanitary sewer	
Vehicle Washing	system, proper disposal of used fluids, disconnected storm	
Vehicle Storage	drains, automatic shutoff nozzles, signs, spill response plans, spill clean up materials, dry clean up methods, employee training, stormwater retrofits	
Outdoor Loading and Unloading	Covered loading and unloading areas, secondary containment,	
Outdoor Storage	storm drain disconnection or treatment, inventory control, spill response plans, spill clean up materials, dry clean up methods, employee training, stormwater retrofits	
Dumpster/Waste Management	Dumpster/waste management, secondary containment, storm drain disconnection or treatment, liquid separation/containment, employee training	
Building Repair	Temporary covers/tarps, employee training, contractor	
Building Maintenance	training, proper cleanup and disposal procedures,	
Parking Lot Maintenance	disconnected storm drains, dry cleaning methods, stormwater retrofits	
Turf Management	Integrated pest management, reduced non-target irrigation,	
Landscaping	careful applications, proper disposal of landscaping waste, avoid blowing and hosing to storm drain, employee training, stormwater retrofits	
Swimming Pool Discharges	Discharge to sanitary sewer system, discharge to pervious areas, employee training	











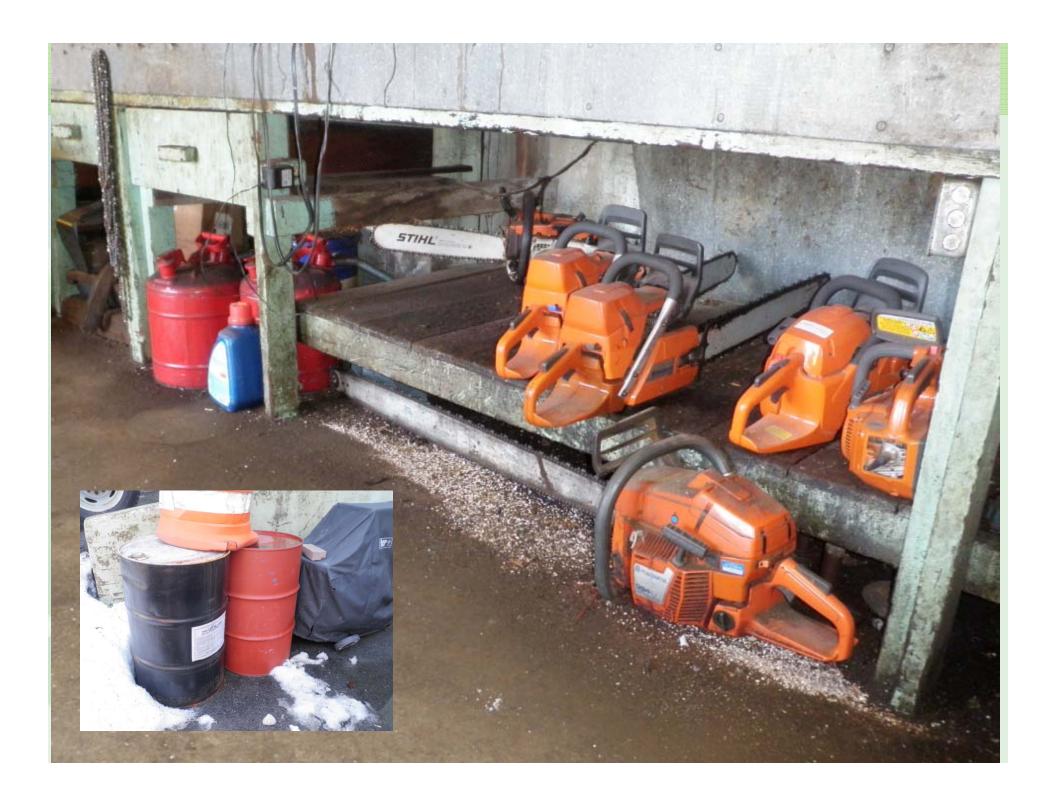




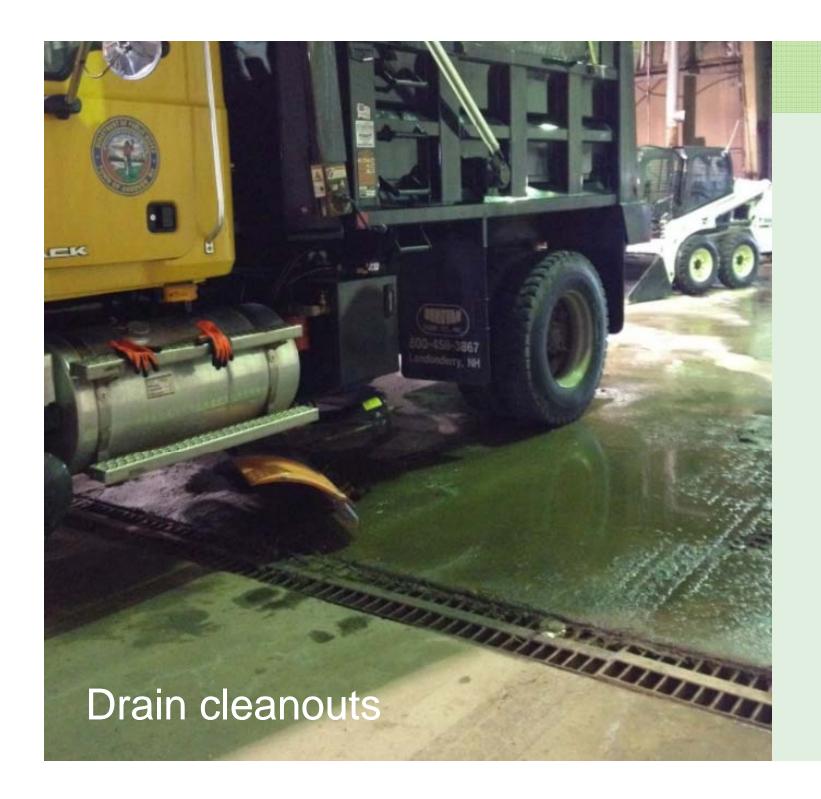






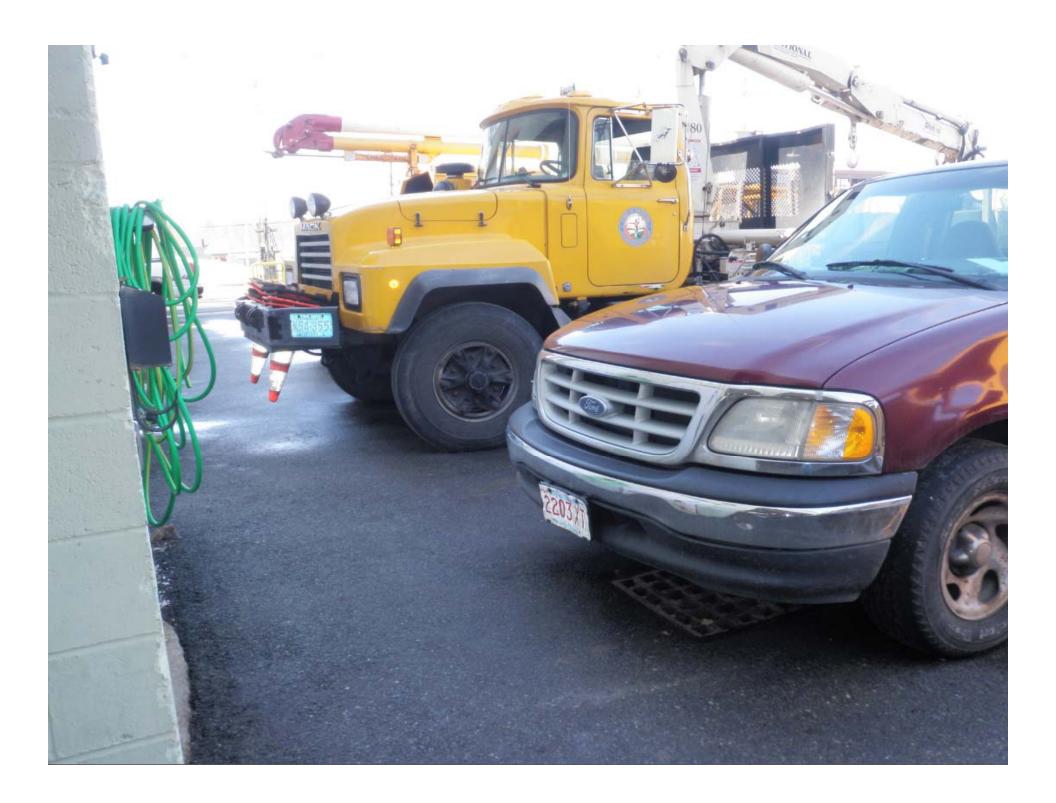














## **Outdoor Material Storage and Transfer**



- Cover or enclose
- Locate away from stormdrains
- Secondary containment
- Stormwater treatment
- Dry cleanup methods
- Employee training and Awareness
- Retrofits



















### **Waste Management**





- Dumpster cover or enclosure
- Disconnection from storm drain or provide treatment
- Liquid separation/ containment
- Employee training



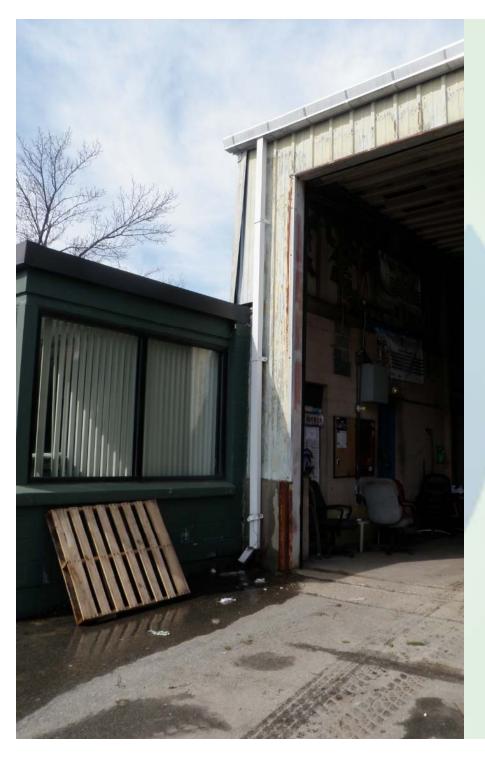






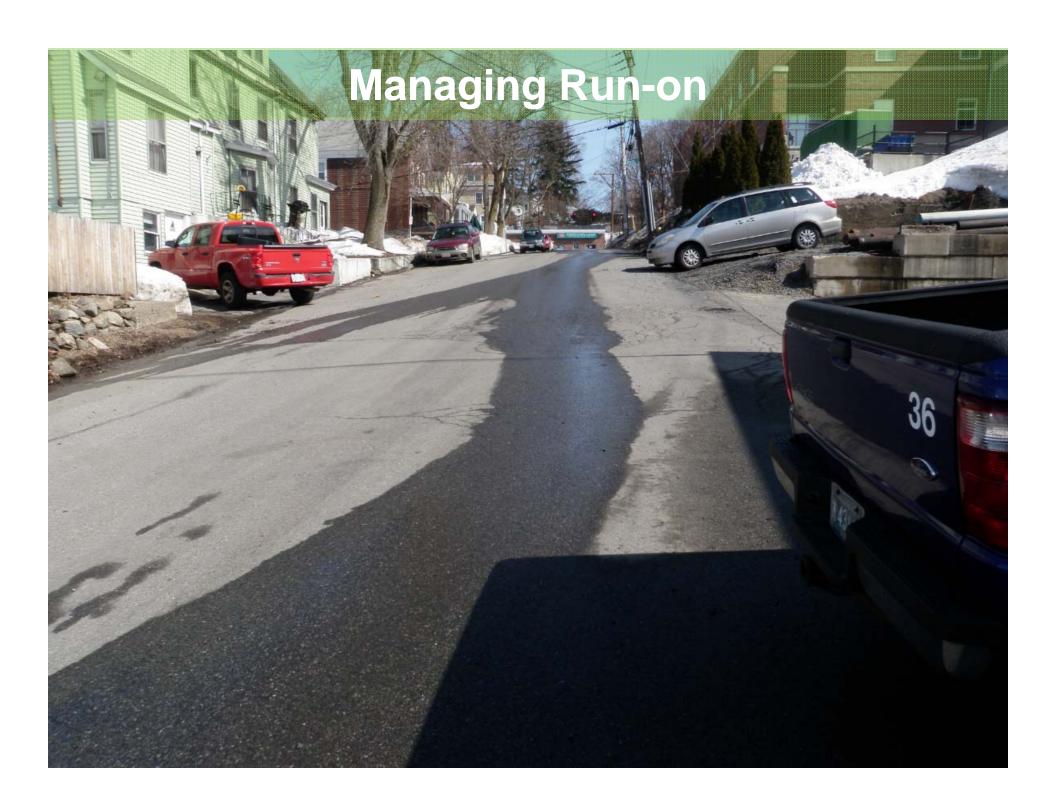
## Buildings, parking lots, stormwater BMPs





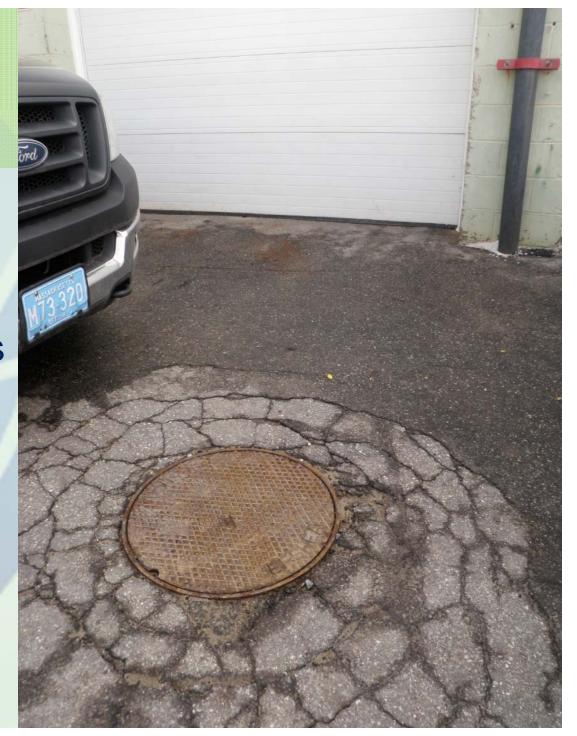
- Washwater from building/surface cleaning cannot be discharged to stormdrains
- Sweeping of parking lots and maintenance of catch basins
- Maintenance of stormwater facilities
- Repaving considerations
- Reducing sedimentation and contamination on unpaved yard areas
- Disconnecting impervious cover





## Stormwater Treatment Practices

- What and where are they?
- Are they the best option for my facility's pollutants and downstream waterway?
- What is the maintenance procedure?
- Can we retrofit?



4. What is the biggest PP/GH challenge at this site?

 What does Andover DPW need to implement to comply with 2014 MS4 PP/GH requirements?



# Spill Prevention Control & Countermeasure Plans

- Required under 40 CFR 112 for facilities that:
  - Have an aboveground oil storage capacity of more than 1,320 gallons or a completely buried oil storage capacity greater than 42,000 gallons; and
  - Could reasonable be expected to discharge
     oil to navigable waters or adjoining shorelines
     in quantities that may be harmful

# Spill Prevention Control & Countermeasure Plans

- Aggregate storage volume:
  - Example:
    - Three 55-gallon drums
    - 1,000 gallon Diesel AST
    - 250 gallon Gasoline AST
    - 1,415 gallons of storage capacity combined







## **Secondary Containment Requirements:**



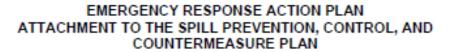
## **Spill Response Resources**



## **Employee Training / Emergency Response**

- SPCCP Requirements:
  - Annual Discharge Prevention Briefings
  - Initial training for all oil handling personnel
  - Established spill response procedures
  - Established notification procedures:
    - Local Response Officials
    - Cleanup Contractors
    - Facility Managers
    - Massachusetts DEP
    - National Response Center





### SUN ISLAND FUEL, INC. NANTUCKET, MASSACHUSETTS

This Emergency Response Action Plan has been developed for Sun Island Fuel, Inc., 5 Sun Island Road, Nantucket, Massachusetts, 02554 as a guide to assist in the response to releases of oil or hazardous materials to the environment.

#### 1.0 EMERGENCY NOTIFICATION PHONE LIST

National Response Center (to report a release to navigable waters)

24-Hour Call Center: (800) 424-8802

Massachusetts Department of Environmental Protection

Emergency Response Center

24-Hour Call Center: (888) 304-1133

Massachusetts State Police: 911 or (508) 228-0706

Nantucket Fire Department: 911 or (508) 228-2323

Nantucket Police Department: 911 or (508) 228-1212

Sun Island Fuel, Inc. Emergency Response Personnel include the following:

### Spill Response Coordinator:

Dennis Egan, President Sun Island Fuel, Inc. (774) 836-5664 (24-Hour Contact Number)

### Alternate Spill Response Coordinator:

Scott Herrick Operations Manager (508) 228-3272 (24-hour contact number)



## **SPCCP Program Management**

- SPCCP must be amended if there is a change in the potential for a discharge from the facility (within 6 months)
- SPCCP must be reviewed every 5 years
  - Amended within 6 months to include more effective prevention and control technology



## **Additional Regulations**

### Tier II Reporting

- For all hazardous chemicals: 10,000 pounds (~1500 gallons for diesel / 1650 gallons for gasoline)
- Emergency Planning and Community Right to Know Act (EPCRA)
- Notification to local, county, and state emergency response agencies

## Underground Storage Tank Requirements

- Class A/B Operator
- Monitoring and inventory reconciliation
- Inspection Requirements by Third Party Inspector (every 3 years)



### Resources

### Merrimack Valley Planning Commission <a href="http://mvpc.org/">http://mvpc.org/</a>

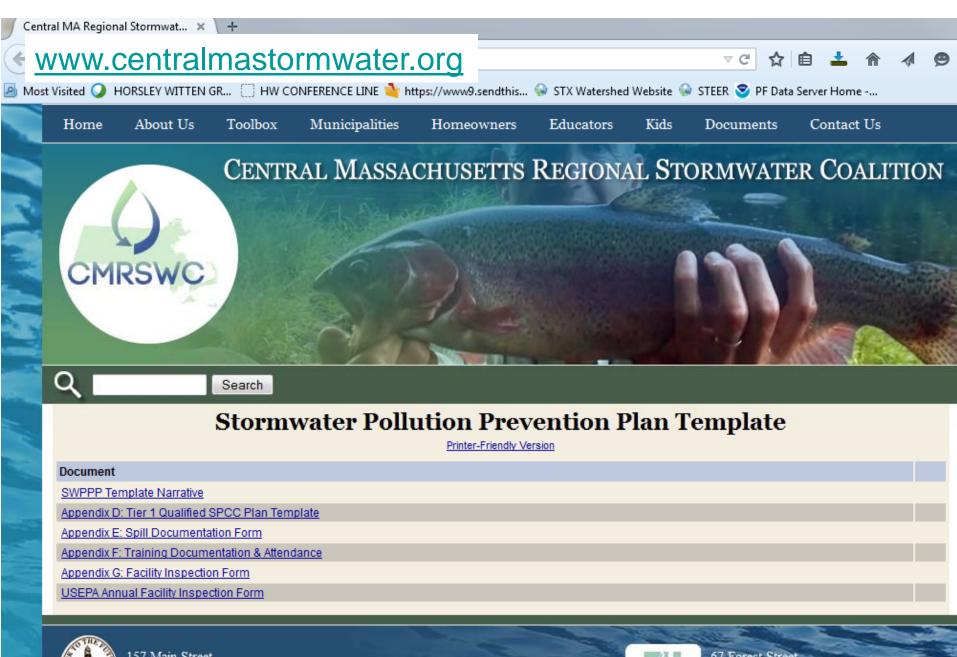
### Pollution Prevention/Good housekeeping Practices

- <u>EPA http://water.epa.gov/polwaste/npdes/swbmp/Pollution-Prevention-Good-</u> Housekeeping-for-Municipal-Operatators.cfm
- Winter Parking Lot and Sidewalk Maintenance Manual (June 2008)
   www.pca.state.mn.us/publications/parkinglotmanual.pdf
- Minnesota Snow and Ice Control: Field Handbook for Snow Operators (Sept 2012).
   www.mnltap.umn.edu/publications/handbooks/documents

### Regulations

- EPA Region 1 MS4 Permit Information
   http://www.epa.gov/region1/npdes/stormwater/#smallms4program
- Spill Prevention, Control, and Countermeasure Rule: <a href="http://www.epa.gov/oem/content/spcc/">http://www.epa.gov/oem/content/spcc/</a>
- MassDEP 2012 Integrated List of Waters 303(d)
   <a href="http://www.epa.gov/region1/npdes/stormwater/MS4\_MA.html">http://www.epa.gov/region1/npdes/stormwater/MS4\_MA.html</a>









67 Forest Street Mariborough, MA 01752 www.tataandhoward.com

### **CWP Urban Watershed Restoration Manual Series**

#9 Municipal Pollution Prevention/Good Housekeeping Practices—**Programs** 

#8 Pollution Source Control Practices--Solutions

#11 Unified
Subwatershed and Site
Reconnaissance: A
User's Manual—
Assessment Protocols



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### Water: Best Management Practices

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**Drinking Water** 

Education & Training

You are here: Water » Pollution Prevention & Control » Permitting (NPDES) » Best Management Practices » Pollution Prevention/Good Housekeeping for Municipal Operatators

### Pollution Prevention/Good Housekeeping for Municipal Operatators

#### Education

Municipal Employee Training and Education

#### **Municipal Activities**

Coal-Tar Sealcoats and Polycyclic Aromatic Hydrocarbons (2 pp, 389K, About PDF)

Municipal Landscaping

Municipal Vehicle Fueling

Municipal Vehicle and Equipment Maintenance

Municipal Vehicle and Equipment Washing

Parking Lot and Street Cleaning

Road Salt Application and Storage

Roadway and Bridge Maintenance

Storm Drain System Cleaning

#### **Municipal Facilities**

Hazardous Materials Storage

Materials Management

Municipal Facilities Management

Spill Response and Prevention

#### **EPA Internet Resources:**

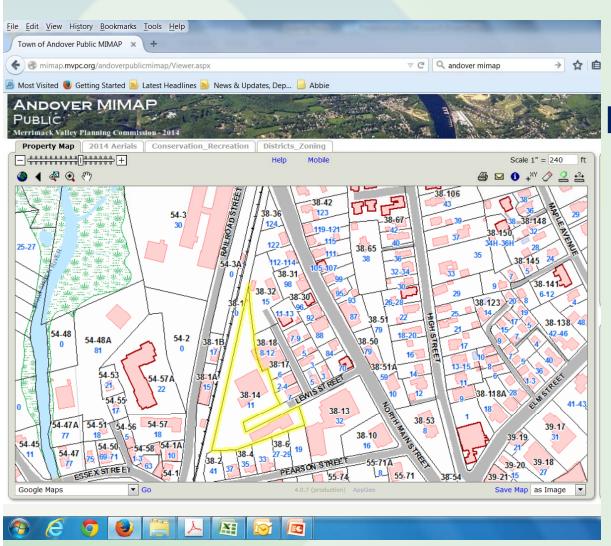
- Urban Management Measures Guidance Chapters 7, 9 and 11 address some of the issues found in this minimum measure.
- · Stormwater case studies on good housekeeping includes case studies of how a Phase I or Phase II community has implemented the good housekeeping requirements.

#### Other Internet Resources:

- 2005 Stormwater Management Manual for Western Washington: Volume IV -- Source Control BMPs EXIT Disclaimer
- Example Good Housekeeping Practices Alameda Countywide Clean



## Efficiencies, Cost Sharing, Working Together



### Food for Thought:

- Mapping
- Field Investigation
- Training
- Outreach
- Purchasing



Anne Kitchell

akitchell@horsleywitten.com

Gary Hedman

ghedman@horsleywitten.com

Ellie Baker

ebaker@horsleywitten.com

Horsley Witten Group, Inc.

Sandwich: 508-833-6600

Newburyport: 978-499-0601

