

Chapter 8

Minimum Control Measure: Item 6

Pollution Prevention/Good Housekeeping for Municipal Operations

A. Permit Requirements

Section 4.2.6.1 of the general MS4 permit requires the permittee to develop and implement an operations and maintenance program that includes a training component and has the ultimate goal of preventing or reducing pollutant runoff from municipal operations. As part of the SWMP, Pollution Prevention/Good Housekeeping program shall include the following information, at a minimum;

4.2.6.1.1 – A government employee training program to prevent and reduce stormwater pollution from activities such as park and open space maintenance, fleet and building maintenance, new construction and land disturbances, and stormwater system maintenance. The permittee shall describe any existing, available material the permittee plans to use such as those available from EPA, the state, or other organizations. The permittee shall describe how this plan will coordinate with all other minimum control measures, monitoring and TMDL implementations where applicable; *See Section D, BMP #1, BMP #2. See addendum MCM #3-11 copy of “Municipal Stormwater Pollution Prevention” training program utilized by the City; See MCM #3-12 copy of One and Two Family Residential Construction Sediment and Erosion Control Guidelines training material; See addendum MCM #3-13 copy of the “After the Storm” training material provided by the Environmental Protection Agency. These same training materials also work hand in hand with MCM #3 IDDE Employee Training Programs.*

4.2.6.1.2 – A List of all municipal operations that are impacted by this operation and maintenance program. *See addendum MCM #6-1 draft copy of the City’s Municipal Pollution Prevention-Good Housekeeping Operation and Maintenance Plan.*

The permittee shall also include a list of industrial facilities that the permittee owns or operates that are subject to NPDES permits for discharges of stormwater associated with industrial activity that ultimately discharge to the permittee’s MS4. *See addendum MCM #6-2 copies of these permits.*

The permittee shall include the permit number or a copy of the No Exposure Exemption Certification (if applicable) for each facility. NPDES permitted facilities not owned or operated by the permittee are not required to be part of the list; *the “No Exposure Exemption Certification” does not apply to any City of Nixa Municipal facilities.*

4.2.6.1.3 - Maintenance BMPs, maintenance schedules and long term inspection procedures for controls to reduce floatables and other pollutants to the permittee’s regulated small MS4; *See Section D, BMP #3. See addendum MCM #6-1 draft copy of the City’s Municipal Pollution Prevention-Good Housekeeping Operation and Maintenance Plan.*

4.2.6.1.4 - 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 and salt/sand storage locations and snow disposal areas the permittee operates; *See addendum MCM #6-1 draft copy of the City’s Municipal Pollution Prevention Good Housekeeping Operation and Maintenance Plan.*

4.2.6.1.5 - Procedures for the proper disposal of waste removed from the permittee’s Small MS4 and areas of jurisdiction, including dredged material, accumulated sediment, floatables and other debris; *See addendum MCM #6-1 draft copy of the City’s Municipal Operation and Maintenance plan.*

4.2.6.1.6 - Procedures to assess impacts of water quality for new flood management projects, if applicable. Flood management projects are those projects developed or designed to reduce flooding. **Not Applicable.**

4.2.6.1.7- All paints, solvents, petroleum products and petroleum waste products (except fuels) under the control of the permittee shall be stored so that these materials are not exposed to stormwater. Sufficient practices of spill prevention, control and /or management shall be provided to prevent any spill of these pollutants from entering waters of the state. Any containment system used to implement this requirement shall be constructed of material compatible with the substances contained and shall also prevent the contamination of groundwater. *See addendum MCM #6-1 draft copy of the City’s Municipal Operation and Maintenance plan.*

B. Benefits of a Pollution Prevention/Good Housekeeping Program

The pollution Prevention/Good Housekeeping Operations is a key element of Stormwater Management Program. This measure requires the examination and subsequently altered actions to help ensure a reduction in the amount and type of pollutant that: (1) collects on streets, parking lots, open spaces, storage, and vehicle maintenance areas, all of which are discharged into local waterways; and (2) result from actions such as street maintenance, environmentally damaging municipal 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 activities, facility operations and property management, the City of Nixa can also realize cost savings from such things as spill prevention (thus reducing clean-up costs), inventory control, and re-use/recycling of materials.

C. City Operation and Maintenance

The City will develop and implement an Operation and Maintenance program. The main intent of the program is the prevention of pollutant runoff from municipal operations. In order to achieve this, the City will check all facilities for possible illicit discharges. For example, some of the floor drains may be connected to a storm sewer and if someone were to pour something down the drain that is considered a pollutant; it then becomes an illicit discharge. The Operation and Maintenance program will follow guidance in the City's Operation and Maintenance Manual. The manual will consider the following topics:

1. List and locations of all City owned and operated municipal operating facilities.
2. Description of the facilities and activities they perform.
3. Identification of all activities that may cause pollutant runoff.
4. Determination of Best Management Practices (BMPs) that could mitigate the risk of pollutant runoff. This will include spill prevention and control facilities for materials such as paint, solvents, petroleum products, chemicals, toxic or hazardous substances, and substances regulated under the Resource Conservation and Recovery Act (RCRA) or the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA).
5. Required annual training by the City on BMPs for each facility.
6. Inspection requirements.

7. Implementation of the City wide (all City of Nixa owned/or operated facilities) Spill Prevention and General Response Plan; *See addendum MCM #6-3 draft copy of Spill Prevention and General Response Plan.*

The City will also, as part of its Spill prevention program, implement additional environmentally enhancing practices for each City facility, for example:

Materials/Supplies acquisition, storage and usage, including

- Material description,
- Maximum quantity kept on hand,
- Allowable storage times, and
- Storage location.

D. Program BMPs

#1 Municipal Operation and Maintenance (O & M) Plan (4.2.6.1.1, 4.2.6.1.2)

Description: In year 2 (2018) of this permit cycle, the City will finalize the development of a municipal Operations and Maintenance Plan. This O&M Plan will be evaluated annually for effectiveness by the O & M Plan committee. In year 5 (2021) this entire plan will be reviewed and updated as a result of the information obtained from the annual evaluations.

Measurable Goals: To prevent chemicals, sediment, solid or hazardous waste from leaving our municipal operations facilities and becoming stormwater pollution. The City will record and track all O & M inspections completed, potential pollution issues discovered and corrective actions taken. Any facilities deemed a hotspot as result of information gathered from these inspections, will be inspected more frequent so as to eliminate any chance of potential discharges. This inspection data will be reviewed annually and will be used to help evaluate the effectiveness of this BMP.

Rational for BMP: Permit Requirement

Parties Key to Implementation: Personnel from all City Municipal facilities.

#2 City of Nixa Employee Stormwater Operation & Maintenance (O & M) Plan Committee (4.2.6.1.1)

Description: In year 2 (2018) of the current permit cycle, the City will assemble an O & M Plan committee made up entirely of city staff. This committee will review the draft O & M Plan for alteration and/or revisions prior to finalization and implementation of the Plan. This committee will meet quarterly in year 2 until the O & M Plan is finalized. Once that is achieved, this committee will meet no less than 2 times a year for the remainder of this permit cycle. This committee will continue to meet to review the Plan for effectiveness and these meetings will also serve as the continuous employee training program for this plan.

Measurable Goal: To staff this committee with at least one staff member representative from all City municipal facilities effected by this plan, so as to permit them to have a voice in the policy and to help train everyone else at their facility or department on the O & M Plan. The City will record the number and names of attendees, what review items were discussed, what was decided and what actions were taken.

The City will continue to implement an employee training program regarding stormwater quality issues and municipal good housekeeping procedures. This training program will be an integral part of these committee meetings and will serve to educate all employees on the stormwater pollution prevention requirements and best management practices that are in place.

The City will continue to utilize the “After the Storm” video training material as provided by the Environmental Protection Agency, *see addendum MCM #3-13 copy of “After the Storm” training material*. Furthermore, the City will continue to utilize the “Municipal Storm Water Pollution Prevention Best Management Practices, Employee Training” material series, *see addendum MCM #3-11 copy of the “Municipal Storm Water Pollution Prevention Best Management Practices, Employee Training” material*.

This ongoing employee training is targeted to employees conducting or involved in the following municipal operations:

- Parks and open space maintenance
- Street, road and stormwater system maintenance
- Vehicle and equipment maintenance
- New municipal construction and land disturbances
- Municipal parking lots
- Building maintenance
- Public Works storage yards
- Sand/gravel/dirt/salt storage locations

The following is a list of the target facility representatives:

- Administration/Management
- Planning and Development/Building Regs
- Utilities
- Police Department
- Park Department
- Street Department
- Electric Department
- Water/Wastewater Department (1 ea.)
- Public Works Inspector (MS4 Coordinator)
- Fleet Maintenance

Rational for BMP: In order to achieve the most effectiveness from this Municipal O & M Plan, it needs buy in from all parties involved. So, to achieve that buy in, these representatives will be given a voice in the development and application of the Plan, to ensure that the BMPs contained therein are properly addressed and maintained.

Parties Key to Implementation: Departmental representatives listed above.

#3. Municipal Operation Facilities Inspections (4.2.6.1.3)

Description: Inspections of City owned & operated public municipal operation facilities. These inspections are completed specifically for the discovery of any Illicit Discharge including any onsite sewage discharge that might be present.

Measurable Goal: In past years the City has actually inspected all: 46 City owned public Municipal Operation facilities annually. Now that the MS4 permit requirements have gotten so involved, our actual likely obtainable goal will be to inspect 50% annually. Priority areas will be inspected more frequently as to insure that any illicit discharges are discovered as early as possible. The City will record and track all inspections completed including the number of discharges found and eliminated annually to evaluate the effectiveness of this BMP. *See addendum MCM #3-5 example of City Of Nixa Municipal Operations Inspection form and list of facilities; This BMP will work hand in hand with MCM #3 Illicit Discharge Detection and Elimination chapter of the SWMP; See addendum MCM #6-1 draft copy of the City's Municipal Operation and Maintenance plan.*

Rational for BMP: These boots on the ground inspections of the municipal operations facilities listed above are how we accomplish what the City considers to be the ultimate "Measurable Goal", to discover and eliminate stormwater pollutants.

Parties Key to Implementation: MS4 Coordinator, Asst. Public Works Inspector, other trained stormwater inspectors.

#4 Hazardous Materials Management

Description: The City will develop and maintain a hazardous materials management program that minimizes the impact to water quality through the proper storage, use, and disposal of chemicals and bulk materials throughout the City. In year 2 (2018) the City will finalize and implement a Spill Prevention and General Response Plan, *See addendum MCM #6-3 a draft copy of City of Nixa Spill Prevention and General Response Plan.*

Measurable Goals: Annually, the City will evaluate the status and effectiveness of the Spill Prevention and General Response Plan. As part of the Spill Prevention Plan, the City will compile a list of hazardous materials purchased, where and how it is stored, how much is on hand and how that material is utilized by the City. If applicable and feasible, the City will conduct research on less toxic alternatives and ensure that proper handling/storage methods are practiced. The City will re-evaluate the effectiveness of this BMP in year 5 (2021) for effectiveness and will make any changes and/or updates at that time.

In years 3 - 5 (2019 – 2021) the City will complete an example BMP (such as a secondary containment berm) on select city property with documentation of each major step submitted to local media, social media, etc. This will allow citizens to follow steps taken and understand why these BMPs are being implemented. This will also work closely with MCM #1, MCM #2, MCM #3.

Rational for BMP: Though the City does not deal or work with a great deal of Hazardous Materials, there are a number of chemicals that the City does work with, that in a concentrated state could be hazardous to personnel.

Parties Key to Implementation: All City Staff, Police, Fire, HazMat Team

E. Chapter Summary Table

BMP ID #	BMP	Measurable Goal	Activity	Due Date	Responsible Party
1	O & M Plan	Prevent chemicals, sediment, solid or hazardous waste from leaving our municipal operation facilities	Finalize and implement Evaluate effectiveness Review for update	Year 2 Years 3-5 Year 5	O & M Committee members
2	O & M Committee	Give employees a chance to have a voice in the policy and to help with training	Assemble an O & M Plan committee made up entirely of city staff Meet quarterly Meet bi-annually Evaluate effectiveness	Year 2 Year 2 Years 3-5 Years 3-5	O & M Committee members
3	Inspections	Inspect 50% annually	Inspect City owned & operated public municipal operation facilities Evaluate effectiveness	Years 1-5 Years 2-5	Public Works Inspector, Asst. Public Works Inspector

4	Hazardous Material Management	Finalize and implement Spill Prevention and Response Plan Evaluate effectiveness of Spill Plan	Finalize and implement Evaluate effectiveness Complete an example BMP	Year 2 Years 3-5 Years 3-5	All City Staff, Nixa Fire Protection District, Hazmat Team
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