

BRADFORD WOODS BOROUGH
Minimum Control Measure 6
Pollution Prevention and Good
Housekeeping

PAG-13 General NPDES Permit No. PAG136263

MCM 6 POLLUTION PREVENTION

GOOD HOUSEKEEPING PLAN

Introduction

The goal of this plan is to implement an operation and maintenance program that includes training pertaining to the Municipal Separate Storm Sewer System (MS4) Program. The ultimate goal of the MS4 Program is to reduce, or if possible, prevent pollutant runoff from the Borough's operations. This plan will be updated as needed, and at least once per year. The plan has input from all department heads, as every department contributes, in some form, to the program.

Per the Pennsylvania Department of Environmental Protection Agency (PADEP) NPDES Permit, there are 3 Best Management Practices (BMPs) that the Borough must comply with.

BMP #1

Identify and document all facilities and activities that are owned or operated by the municipality and have the potential for generating storm water runoff to the regulated MS4. Not many Borough operations and activities may contribute to producing storm water runoff that discharge to the regulated MS4. A detailed inventory of operations and facilities are listed in Appendix A, along with the maintenance criteria and frequency of maintenance and inspections. The inventory of municipal facilities and operations is reviewed and updated as new facilities and activities are built or implemented. The current list includes street sweeping, snow removal/deicing, inlet and outfall cleaning, lawn/ground care, storm sewer inspections and repairs, park and open space maintenance, municipal building maintenance, new construction, vehicle maintenance, fueling, washing, maintenance of storage yards, leaf/yard debris pick up, wastewater treatment plants, fleet and maintenance shops, and storm water storage or treatment units.

BMP #2

Develop, implement and maintain a written operation and maintenance (O&M) program for all municipal operations and facilities that could contribute to the discharge of pollutants from the regulated small MS4s, as identified under BMP#1. This program (or programs) shall address municipally owned storm water collection or conveyance systems, but could include other areas (as identified under BMP#1). The O&M program should stress pollution prevention and good housekeeping measures, and contain site-specific information.

A complete inventory of municipally owned facilities are listed in Attachment C. Each facility has an attachment of the schedule of maintenance and inspections as well as how it can contribute to pollutant runoff to the MS4. The following are municipal operations that could contribute to runoff of storm water to the MS4. The O&M of the operations listed in BMP#1 will address the following areas:

- Management practices, policies, and procedures shall be developed and implemented to reduce or prevent the discharge of pollutants to our regulated small MS4s.
- Maintenance activities, maintenance schedules, and inspection procedures to reduce the potential for pollutants to reach the Borough's regulated MS4.
- Controls for reducing or eliminating the discharge of pollutants from streets, roads, highways, municipal parking lots, maintenance storage areas, and salt/sand storage locations and snow disposal areas.

- Procedures for the proper disposal of waste removed from the Borough's MS4s and the municipal operations, including accumulated sediments, trash, household hazardous waste, used motor oil, and other debris.

Street Sweeping: Street sweeping is a goal for the Borough to complete in year 2019. The Borough has street swept in the past. Collecting debris, garbage, cinders, and other material off of the Borough's roads prevents it from polluting the MS4.

Snow Removal/Deicing: Snow removal and deicing is important to the safety of the Borough residents. Salt has a large, and harmful, impact to surface water due to the solubility of chloride in water. Chloride is toxic to aquatic life and there is no natural process to break down chloride to remove it from the environment. The result of high salt in water is low oxygen and making the water non-viable for aquatic life. Properly dispersing salt, and calibrating the plow trucks, ensures that the least amount of salt is used while keeping the residents safe. On average, the Borough uses 375 tons of salt per year, depending on the severity of winter and amount of snowfall and ice received in the surrounding area. Salt is the material most used for deicing in the Borough. It is common practice for the Borough to use an additive (calcium) to the salt to increase the productivity. The salt is stored in a garage located in the Public Works storage yard. The salt is observed daily to ensure that it is kept under cover to prevent the contribution of pollutants to the abutting stream. During a snow event, the Borough has 1 active plow truck, which is stored in the Public Works garage when not in use. All drains in the garage are tied into the sanitary sewer to ensure that no contaminants are reaching the MS4. Wash water is also diverted to the sanitary to prevent contaminants in the MS4 or infiltrating into groundwater.

Inlet/Outfall Cleaning: Bradford Woods Borough personnel screen every outfall and inlet in the Borough yearly. Inlets and catch basins frequently collect debris, garbage, and sediment, per their design, that requires maintenance or cleaning. All Borough inlets are inspected by Public Works personnel and the maintenance required is documented on an inspection sheet. This documentation is kept in the MS4 files located at the municipal building. When there is an observation made that an inlet, catch basin, or outfall needs maintenance, cleaned, or some form of attention, it is put on a schedule by the Public Works Director. The Public Works Director will judge the severity of the maintenance and schedule the work accordingly. All debris and sediment that is collected in the inlets or outfalls is removed. The materials are then disposed of by placing the material at the salt shed.

Lawn/Ground Care: Lawn and open spaces are maintained by the Borough's Roads. Operations to maintain law and open spaces include grass cutting, tree removal, fertilizing of grass, pond care.

Fire Company Building Maintenance: The building requires regular maintenance that may contribute to storm water. The exterior of the building is cleaned by the Fire Company. While performing this task, the inlets are blocked and the water is diverted to a grass area to prevent the contaminants in the water from entering the MS4. The parking areas surrounding the fire company building could also contribute to pollution entering the MS4 from leaking vehicles. The parking lot is observed frequently for spills. All spills are cleaned up immediately if found. Trash is also picked up immediately to prevent it from reaching the inlets in the parking lot. Inlets in close proximity to fueling stations or maintenance buildings are scheduled to have an inlet filter, or insert, placed in them for containment of pollutants. The inlet filters will be rated to collect sediment as well as petroleum products. The filters are inspecting to ensure proper function. Inlet filters will be replaced as needed.

Fueling: There are no fueling stations located anywhere in the Borough. All fueling is done outside of the Borough at Sheetz.

Washing: Vehicles and equipment are washed, as needed, to keep the equipment in good working condition. All washing takes place in the garages, with drains that are connected to the sanitary sewer. If a piece of equipment needs to be washed outside, it is done in a gravel, grass, or permeable area and away from any inlets tied to the MS4. Additionally, when washing equipment, the soap is biodegradable, phosphate-free, detergents that are environmentally friendly. Whenever possible, Borough personnel will not use detergents and will clean equipment with water only. It is also common practice to limit the use of power washers, whenever possible.

Maintenance of Equipment: Vehicles and equipment are maintained in the garages or at the salt shed and work is performed by Borough personnel or hired professionals. All fluids, such as oil and antifreeze, are stored properly and safely. The drums and containers that hold the materials are all labeled and have secondary containments placed under them to catch any leaks. If there should be an unforeseen breach in the secondary containment, all fluids would go into the floor drain that is connected to the sanitary sewer. The garage is inspected weekly by the Public Works representative. Documentation is kept on site and a copy is given to the Environmental Compliance and Sustainability Coordinator to be placed in the MS4 file. The inspection form and procedure can be found in Appendix B.

Leaf/Yard Pickup: Borough residents have the opportunity to compile their yard waste each month and place them in biodegradable brown bags for Waste Management to pick up and dispose of in the proper place. The dates of the leaf and yard waste pickups are placed on the municipal website and also in the Borough's newsletter.

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 municipal operations to the Borough's regulated MS4. The program may be developed and implemented using guidance and training materials that are available from federal, state, local agencies, as well as other organizations. Any municipal employee or contractor shall receive training. This could include public works staff, building/zoning/code enforcement staff, engineering staff (on-site and contracted), administrative staff, elected officials, police and fire responders, volunteers, and contracted personnel. Training topics should include operation, inspection, maintenance and repair activities associated with any of the municipal operations/facilities identified under BMP#1.

Training should cover all relevant parts of the permittee's overall storm water management program that could affect municipal operations, such as illicit discharge detection and elimination, construction sites, and ordinance requirements.

All personnel employed by Bradford Woods Borough is required to receive MS4 training at least annually and sign off that they understand what was presented. The training will be held by either the Borough Manager, the department heads, or the Engineer. Every training held is documented through a sign in sheet that is placed in the MS4 file and attached to the Progress Report to the PADEP. Information on the sign in sheet to be filled out includes the date of the training, the names and titles of the attendees, the topics covered, and presenter's name. If the training has materials, such as a PowerPoint presentation, a copy of all training materials will be given to the attendees. Training may be held multiple times a year, but no less than once, and will contain different material each session. The material presented will be tailored to the group contribution to the MS4 program. Please refer to Appendix B for more details pertaining to training.