COR 070000 Good Housekeeping and Pollution Prevention Program Procedures TEMPLATE

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*DISCLAIMER:*

*This document, courtesy of SPLASH members, has been provided for* ***educational purposes only*** *to assist other permittees regarding the MS4 Non-standard Permit, effective November 1, 2021.*

*This document may contain omissions or errors and therefore any use of this will be entirely at your own risk.*

Logo

Description automatically generated

(The following template is an example only. There are many methods to comply with the COR-070000 MS4 Permit and many types of permittees. Edit this document as needed based on your specific program.)

*Permittee to fill out yellow highlighted sections.*

*Recordkeeping that must occur has been included with the requirement section.*

*Insert Document Revision number and date here.*

# Introduction

Protecting the quality of stormwater runoff is required by the Colorado Discharge Permit System (CDPS) Regulations. The procedures described in this document detail compliance with requirements of the Municipal Separate Storm Sewer System (MS4) Permit issued by the Colorado Department of Public Health and Environment (CDPHE). The CDPHE, Water Quality Control Division (WQCD), through the MS4 permit issued to the Permittee, requires the Permittee to control and reduce the discharge of pollutants to protect stormwater quality and to satisfy the appropriate water quality requirements of the Colorado Water Quality Control Act and the Colorado Discharge Permit Regulations (Colorado Regulation 61). Specifically, 61.8(11) Conditions for Phase II Municipal Stormwater Permits states

*(a) An individual permit or general stormwater permit certification issued to a regulated small MS4 shall contain the following requirements, at a minimum:*

*(i) …regulated small MS4 develop, implement, and enforce a stormwater management program designed to reduce the discharge of pollutants from the MS4 to the maximum extent practicable (MEP), to protect water quality, and to satisfy the appropriate water quality requirements of the Colorado Water Quality Control Act (25-8-101 et seq., C.R.S.). …Implementation of BMPs consistent with the provisions of the stormwater management program required pursuant to this section and the provisions of the permit required pursuant to subsection (ii) constitutes compliance with the standard of reducing pollutants to the MEP…*

*(ii) (F) Pollution prevention/good housekeeping for municipal operations*

*(I) The permittee must develop and implement an operation and maintenance program that includes an employee training component and has the ultimate goal of preventing or reducing pollutant runoff from municipal operations. The program must also inform public employees of impacts associated with illegal discharges and improper disposal of waste from municipal operations. The program must prevent and/or reduce stormwater pollution from facilities such as streets, roads, highways, municipal parking lots, maintenance and storage yards, fleet or maintenance shops with outdoor storage areas, salt/sand storage locations and snow disposal areas operated by the permittee, and waste transfer stations, and from activities such as park and open space maintenance, fleet and building maintenance, street maintenance, new construction of municipal facilities, and stormwater system maintenance, as applicable*

As required in the MS4 general permit (COR-070000), Good Housekeeping and Pollution Prevention for Permittee Operations, a program must but implemented for facilities and operations that are owned, operated, or performed within the MS4 permit holder’s jurisdictional boundary. The program must prevent or reduce water quality impacts from pollutants being discharged to the MS4 from the MS4 permit holder’s operations and facilities.

## Purpose of Document

This procedure, titled *Good Housekeeping and Pollution Prevention Program Procedures*, documents the process for complying with the Pollution Prevention/Good Housekeeping for Permittee Operations Program in the Non-Standard MS4 Permit (COR-070000).

The procedure may change without public notice if it is found to no longer be effective and/or compliant with the MS4 permit requirements. Unless significant changes warrant, this Document is reviewed annually and updated as necessary.

## Applicability

The Good Housekeeping and Pollution Prevention Program must be applied to facilities and operations that are owned, operated, or performed within the MS4’s jurisdictional boundary. “Applicable permittee operations and facilities” are permittee operations and facilities that are not authorized by a separate CDPS or NPDES discharge permit.

# Section 1: Control Measure Requirements (Part I.E.5.a.i)

This section, titled Control Measure Requirements, documents the process used to meet the requirements of the Good Housekeeping and Pollution Prevention Program for compliance with the selection, installation, implementation, and maintenance of control measures.

Permit Requirement:

Part I.E.5.a.i. Control Measure Requirements: *The permittee must address the selection, installation, implementation, and maintenance of control measures in accordance with Part I.B. At a minimum, control measures must be adequately designed to prevent or reduce all potential pollutants associated with applicable permittee facilities and operations to prevent or minimize the discharge of pollutants, including trash, to state waters.*

*Click here to enter text.*

*Describe the process for ensuring control measures are in place for all permittee facilities and operations are adequately designed and maintained.*

# Section 2: Permittee-owned facility runoff control measures (Part I.E.5.a.ii)

This section, titled Permittee-owned facility runoff control measures, documents the facilities owned and/or operated and the control measures used to meet the requirements of the Good Housekeeping and Pollution Prevention Program.

## Part I.E.5.a.ii.(A) Applicable Facilities

Permit Requirement:

Part I.E.5.a.ii. Permittee-owned facility runoff control measures:

*(A) The permittee shall maintain a list of all applicable permittee-owned facilities. Applicable facilities include the following:*

*1) Vehicle maintenance and washing facilities, motor pools with vehicle maintenance and washing, and loading and unloading areas.*

*2) Asphalt and concrete batch plants that are not subject to a separate CDPS or NPDES permit.*

*3) Solid-waste transfer stations where waste and recyclables are briefly held before further transport.*

*4) Outdoor storage yards with exposed stockpiles of materials, including stockpiles of road deicing salt, salt and sand, sand, and rotomill material, dirt, snow dumps, sweeper tailings and/or spoils, gravel.*

*5) Equipment storage yards.*

*Click here to enter text.*

*List the applicable permittee-owned facilities here.*

## Part I.E.5.a.ii.(B, C) Applicable Facility Procedures

Permit Requirement:

Part I.E.5.a.ii. Permittee-owned facility runoff control measures:

*(B) The permittee shall implement control measures to prevent or reduce potential discharges of pollutants to the MS4 from the applicable permittee-owned facilities. New written procedures shall be developed and implemented for any new applicable permittee-owned facilities prior to associated pollutant sources being present.*

*(C) The permittee shall implement the following categories of control measures as necessary to prevent or reduce the pollutant sources present:*

*1) Preventive maintenance*

*2) Good housekeeping*

*3) Spill prevention and response procedures*

*4) Structural control measures*

*5) Evaluation of non-stormwater discharges*

*6) Personnel training*

Part I.E.5.b.i*.* Permittee-owned Facility Runoff Control Measures: *For each applicable permittee facility and operation:*

*(A) Facility identification*

*(B) Description of all pollutant sources*

*(C) Control measures implemented, including installation and implementation specifications and information*

*(D) Staff (position title) responsible for implementation of control measures and associated documentation*

*(E) Description of control measures implemented for bulk storage structures.*

*Click here to enter text.*

*Describe the process for evaluating pollutant sources at permittee-owned facilities that ensures the categories of control measures are implemented to prevent or reduce the identified pollutant sources.*

*Document*

* *Facility identification*
* *Description of all pollutant sources*
* *Control measures implemented, including installation and implementation specifications and information*
* *Staff (position title) responsible for implementation of control measures and associated documentation*
* *Description of control measures implemented for bulk storage structures.*

*<<Suggested Approach: Generally, the easiest way to do this is by completing a Facility Runoff Control Plan(s). In such a Plan, each applicable permittee-owned facility is evaluated and the implementation of the 6 categories of control measures as well as the recordkeeping A-E above is addressed.>>*

## Part I.E.5.a.ii.(D,E) Facility Inspections

Permit Requirement:

Part I.E.5.a.ii. Permittee-owned facility runoff control measures:

*(D) The permittee shall implement written facility inspection procedures, which must at a minimum include the following:*

*1) An annual visual inspection of each applicable permittee facility and operation.*

*2) A verification that the written facility procedures, documentation, and site map are current.*

*3) Visual observation of locations and areas where stormwater from permittee facilities are discharged off-site; or discharged to state waters, or to a storm sewer system that drains to state waters. The observations, at a minimum, must include the following:*

*(a) Observations for the presence of floating materials, visible oil sheen, discoloration, turbidity, odor, etc. in the stormwater discharge(s),*

*(b) Observations of the condition of and around stormwater outfalls, including flow dissipation measures to prevent scouring, and*

*(c) Observations for the presence of illicit discharges or other non-permitted discharges.*

*(d) Observation of facility conditions, including pollutant sources and control measures, to identify inadequate control measure and control measures requiring maintenance.*

*(E) All inadequate control measures identified under Part I.E.5.a.ii(D) shall be modified or replaced as soon as possible, but not later than 6 months from the visual inspection. If the permittee is unable to modify or replace the inadequate control measure within 6 months, then the permittee must complete the following:*

*1) Develop a plan to modify or replace the inadequate control measure.*

*2) Develop a frequent maintenance plan.*

*3) Install a temporary feature on the inadequate control measure to minimize the risk of pollutants in runoff from municipal operations.*

Part I.E.5.b.i(F) *Maintain inspection records with the following minimum information for all inspections conducted to meet the minimum inspection frequency in Part I.E.5.a.ii(D):*

*1) Inspection date*

*2) Name of inspector*

*3) Applicable facility identification*

*4) Inspection findings including: observations of locations and areas where stormwater is discharged from the site; inadequate control measures; control measures requiring routine maintenance; and if there was any evidence of polluted discharges from the facility.*

*Click here to enter text.*

*Describe the inspection process used at applicable permittee-owned facilities AND OPERATIONS including:*

* *document who is responsible for conducting annual inspections,*
* *how inspection procedures onsite are implemented, including* 
  + *frequency of inspections, once annually at a minimum*
  + *written facility procedures and documentation that are current,*
  + *identification of inadequate control measures or procedures,*
  + *documentation of inspections conducted, including any follow up plans to address inadequate control measures within the required timeframe,*
  + *verification that the site map is current, and*
  + *evaluation of all discharge points for illicit discharges and erosion.*

*If you have an inspection form, ensure it includes the required minimum information and attach it to this document as an appendix. Consider developing an inspection form specific to your facility and operations to ensure each area with potential pollutants has been identified and is inspected for potential pollutants.*

# Section 3: Permittee Operations and Maintenance (Part I.E.5.a.iii)

This section, titled Permittee Operations and Maintenance, documents the requirements for operation and maintenance procedures to ensure compliance with the Good Housekeeping and Pollution Prevention Program.

MS4 Permit requirement:

Part I.E.5.a.iii. Permittee Operations and Maintenance Procedures: *The permittee shall implement control measures that prevent or reduce discharges for applicable permittee operations that are not covered under Part I.E.5.a.ii(A). New written procedures shall be developed and implemented for any new applicable permittee operations prior to associated pollutant sources being present.*

*(A) At a minimum, implementation of the procedures must prevent or reduce stormwater pollution from the following operations conducted by the permittee:*

*1) Operation and maintenance of streets, roads, highways*

*2) Operation and maintenance of permittee parking lots*

*3) Operations at maintenance and storage yards*

*4) Operations at maintenance shops with outdoor storage areas*

*5) Operation and maintenance of snow dumps/snow disposal areas*

*6) Operation and maintenance of sites used for temporary storage of sweeper tailings or other waste piles*

*7) Park and open space maintenance*

*8) Building maintenance*

*9) New construction of permittee facilities*

*10) Application of pesticides, herbicides, and fertilizers*

*11) Large outdoor festivals and events*

*12) Construction activities not subject to the requirements of Part I.E.3.*

*13) Maintenance, replacement, and construction of utilities and the storm system, including operations, such as storage, dewatering, or disposal, associated with removal of sediment, debris, trash, and other pollutant sources from the MS4, including removal of materials, such as trash, from control measures implemented in accordance with Part I.E.4, unless covered by a separate CDPS or NPDES permit.*

*14) Firefighting training and emergency operations.*

*Click here to enter text.*

*Identify activities/operations listed above that are performed by staff plus any other operations that may cause potential pollution (such as Sanitary Sewer Overflows, Water Line Breaks, Bridge Washing, etc). For all activities/operations identified, describe procedures in place or attach procedures as an appendix to this document.*

*<<Note: SPLASH developed standard operating procedures as well as one page training fact sheets in 2012/2013 for everyone’s use however these have not been recently reviewed or updated, but can serve as a helpful starting point.>>*

# Section 4: Nutrient Source Reductions (Part I.E.5.a.iv)

This section, titled Nutrient Source Reductions, documents the pollution prevention program in place to prevent/reduce nitrogen and phosphorus in stormwater runoff associated with applicable operations and facilities to meet the requirements of the Good Housekeeping and Pollution Prevention Program.

MS4 Permit Requirement:

Part I.E.5.a.iv. Nutrient Source Reductions: *The permittee shall implement a pollution prevention program that has the ultimate goal of preventing or reducing nitrogen and phosphorus in stormwater runoff associated with the applicable permittee operations and facilities.*

*(A) The permittee shall evaluate, identify, and document the permittee operations and facilities that are and/or have the potential to contribute nitrogen or phosphorus to the waters receiving the discharge authorized under this permit. The permittee is authorized to meet the requirements of this section through contribution to a collaborative program to evaluate, identify, and target sources state-wide or within the specific region or watershed that includes the receiving waters impacted by the permittee’s discharge(s). At a minimum,*

*1) If the permittee has any operations that use fertilizers, then the permittee shall include the storage and application of fertilizer, including subsequent stormwater or irrigation runoff from areas where fertilizer has been applied, as an identified permittee operations nutrient source.*

*2) If the permittee has any operations that use deicers containing phosphorus, then the permittee shall include the storage and application of deicers as an identified permittee operations nutrient source.*

*(B) Where a permittee operation has been identified under (A) as a potential source of nitrogen or phosphorus, the permittee shall implement control measures that prevent or reduce the nutrient identified (nitrogen and/or phosphorus) from entering stormwater runoff. The control measures shall be implemented and documented in accordance with Part I.E.5.a.ii, if associated with an applicable permittee facility, or in accordance with Part I.E.5.a.iii, if associated with an applicable permittee operation.*

Part I.E.5.b.iii. Nutrient Source Reductions: *Control measures implemented to prevent or reduce nitrogen and phosphorus from permittee operations, including product substitution, installation and implementation information.*

*Click here to enter text.*

*Identify if there are operations that have the potential to contribute nitrogen or phosphorus to discharges from your permit area, including specifically:*

* *storage and application of fertilizer, including areas of irrigation runoff where fertilizer is applied*
* *storage and application of deicers if the deicers contain phosphorus*
* *any other potential nutrient source such as storage of landscaping waste (grass clippings, leaves, etc)*

*For those operations identified as nutrient sources, discuss the control measures in place to reduce/prevent the nutrient from entering stormwater runoff including product substitutions. This can be done as part of the standard operating procedures developed above and included as an appendix.*

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# Section 5: Outdoor Bulk Storage (Part 1.E.5.a.v)

This section, titled Outdoor Bulk Storage, documents the control measures in place for Outdoor Bulk Storage to ensure compliance with the Good Housekeeping and Pollution Prevention Program.

MS4 Permit Requirement:

##### Part I.E.5.a.v. Outdoor Bulk Storage: *Outdoor bulk storage structures, of more than 55 gallons, for petroleum products and any other liquid chemicals located at applicable permittee facilities must have control measures implemented that provide secondary containment or equivalent protection that contains all spills and prevents any spilled material from entering state waters. For the scenario of a single containment system serving multiple tanks, the containment system must have sufficient capacity to contain 10% of the volume of containers, or the volume of the largest container plus 10%, whichever is greater. Bulk storage on mobile refuelers that are subject to the authority and control of the U.S. Department of Transportation, as defined in the Memorandum of Understanding between the Secretary of Transportation and the Administrator of EPA, dated November 24, 1971 are not subject to the requirements of Part I.E.5.a.v. Prior to the compliance date in Part I.H, the permittee must implement practices, such as spill prevention and response, to prevent or reduce pollutants in runoff associated with bulk storage structures.*

*Click here to insert text.*

*Document all bulk storage and the secondary containment system for each. Where necessary, provide calculations to show the secondary containment system meets the permit requirement.*

*If you have drawings/plans used to document the secondary containment, insert them here, or attach them to this document as an appendix.*

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# Section 6: Use of Fire Fighting Foam in Training Activities and Emergencies (Part I.E.5.a.vi)

This section, titled Use of Fire Fighting Foam in Training Activities and Emergencies, documents the requirements for the use of fire fighting foam to ensure compliance with the Good Housekeeping and Pollution Prevention Program.

MS4 Permit Requirement:

Part I.E.5.a.vi. Use of Fire Fighting Foam in Training Activities and Emergencies: *The permittee must prohibit the use of Class B firefighting foam that contains intentionally added perfluoroalkyl and polyfluoroalkyl substances for training or testing purposes. For emergency use, the permittee shall evaluate whether a Class B fluorine-free foam can provide the required performance for the specific hazard. Fluorinated Class B foams should only be used in situations of significant flammable liquid hazard with risk for public safety or significant property loss, where the performance of other foams has not been demonstrated to date. However, the provisions of this Part (I.E.5.a.vi) shall not apply to firefighting training, testing or emergency operations when the use of Class B firefighting foam containing perfluoroalkyl and polyfluoroalkyl substances is authorized by federal law.*

*Click here to enter text.*

*Describe your process for prohibiting the use of Class B firefighting foam that contains intentionally added perfluoroalkyl and polyfluoroalkyl substances for training or testing purposes. NOTE: Colorado House Bill 19-1279, effective August 2, 2019 bans the use of Class B firefighting foam that contains PFAS chemicals for training and for testing systems that suppress fire. CDPHE plans to fund a takeback program for entities that have unused PFAS in storage.*

*If there are no Class B firefighting foam that contains intentionally added perfluoroalkyl and polyfluoroalkyl substances kept onsite, there is no need to evaluate alternative for emergency use.*

*If there are Class B firefighting foam that contains intentionally added perfluoroalkyl and polyfluoroalkyl substances kept onsite, document the evaluation of why it is necessary. Your local fire department may be a resource for this evaluation.*

# Section 7: Training (Part I.E.5.a.vii)

This section, titled Training, documents the requirements implemented for training to ensure compliance with the Good Housekeeping and Pollution Prevention Program.

MS4 Permit Requirement:

Part I.E.5.a.vii. Training:

*(A) The permittee must train applicable permittee staff to implement the Pollution Prevention/Good Housekeeping for permittee-owned facilities and operations.*

*(B) The permittee must identify those who will be likely to inspect the control measures and provide training to those individuals that will conduct inspections in accordance with Part I.E.5.a.ii and Part I.E.5.a.iii.*

*(C) The program must inform permittee staff responsible for operations with the potential to result in an illicit discharge about the permittee’s prohibitions against, and potential impacts associated with, illicit discharges from permittee operations. The training must also include information on trash and its effects on water quality.*

Part I.E.5.a.v. Training*: Name and department of each individual trained, date of training, the type of training, and a list of topics covered.*

*Click here to enter text.*

*Identify the staff (staff titles/organization) that are likely:*

* *to inspect control measures*
* *be responsible for operations with the potential to result in an illicit discharge.*

*Describe the training provided to staff including:*

* *frequency of training*
* *how/when new employees are trained (including seasonal employees, if applicable)*
* *training materials used*
* *how training is documented (name and department of each individual trained, date of training, the type of training, and a list of topics covered).*