Potential Pollutants Associated with Municipal Facilities and Municipal Activities

Pollutants from municipal facilities and activities can eventually make their way to our local waterways through the stormwater conveyance and collection system. These pollutants can cause physical, chemical, and biological harm to our lakes, streams, rivers, and wetlands. Pollutants associated with municipal facilities and activities may include but are not limited to:

- Sediment
- Nutrients
- Trash
- Metals
- Bacteria
- Oil
- Toxic Materials
- Organic Materials
- Pesticides
- Grease

Pollution Prevention/Good Housekeeping is one of the six (6) Minimum Control Measures (MCMs) required under the small MS4 program*. The goal of the Pollution Prevention/Good Housekeeping MCM is to help ensure a reduction in the amount and type of pollution that is generated from municipally-owned and maintained facilities (e.g., streets, parking lots, and vehicle maintenance areas) and eventually discharged into local waterways. An additional goal of MCM #6 is to reduce the amount of pollution that is discharged to waterways from poor maintenance of storm sewer systems.

There are three (3) best management practices (BMPs) required under this MCM.

BMP #1 – Identify and document all facilities and activities that are owned or operated by the permittee and have the potential for generating stormwater runoff to the small regulated MS4. This includes activities conducted by contractors for the permittee.

Municipal Activities may include the following:
- Street sweeping
- Snow removal/deicing
- Inlet/outlet cleaning
- Lawn/grounds care
- Storm system maintenance, inspection and repair
- Park and open space maintenance
- Municipal building maintenance
- New construction and land disturbances
- Right of Way maintenance
- Vehicle maintenance, operation, fueling and washing
- Material transfer operations, including leaf/yard debris pickup and disposal procedures

Municipal Facilities may include the following:
- Streets, roads, highways and parking lots
- Maintenance and storage yards
- Waste transfer stations
- Parks
- Fleet or maintenance shops
- Wastewater treatment plants
- Stormwater conveyances (open and closed)
- Riparian buffers
- Stormwater storage or treatment units (e.g., basins, constructed wetlands, etc.)
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 should address municipally-owned stormwater collection or conveyance systems, but could include other areas (as identified in BMP #1). The O&M plan should stress pollution prevention and good housekeeping measures, contain site-specific information, and address the following areas:

- Management practices, policies, and procedures to reduce or prevent the discharge of pollutants to your small regulated MS4. Consider eliminating maintenance-area floor drains.
- Maintenance activities, schedules, and inspection procedures to reduce the potential for pollutants to reach your small regulated MS4.
- 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 (anti-skid) storage locations and snow disposal areas.
- Procedures for the proper disposal of waste removed from your regulated smalls MS4s and your municipal operations, including dredge spoil, accumulated sediments, trash, household hazardous waste, used motor oil, and other debris.

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 your regulated small MS4s. The program may be developed and implemented using any guidance and training materials that are available from federal, state, or local agencies, or other organizations. Any municipal employee or contractor shall receive training; this may include:

- Public Works Staff
- Building/Zoning/Code Enforcement Staff
- Engineering Staff (On-Site and Contracted)
- Administrative Staff
- Elected Officials
- Police and Fire Responders
- Volunteers
- Contracted Personnel

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

*Please note that this information is not intended to replace regulatory requirements. Actual individual and/or general permits issued by PADEP should be followed to ensure that MS4 regulatory requirements are met. This information was adapted from Appendix A of PADEP’s Stormwater Management Program & EPA’s Stormwater Fact Sheet Series*.