

MCM #6 - Pollution Prevention / Good Housekeeping

The Municipal Separate Storm Sewer System Program

This factsheet is part of our Municipal Separate Storm Sewer System (MS4) series.

To access this series and many other educational resources, please visit: spcwater.org.

An operation and maintenance (O&M) program must be developed and implemented that includes a training component with the goal of preventing and reducing pollutant runoff from your municipal operations and facilities. This must include employee training.

There are 3 Best Management Practices (BMPs) required under this MCM. Learn more about their requirements and resources to help meet these requirements below.

BMP #1

Identify and document all operations that are owned or operated by the permittee and have the potential for generating pollution in stormwater runoff to the regulated small MS4. This includes activities conducted by contractors for the permittee. This inventory must be reviewed and updated annually.

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.)

Pollution Prevention / Good Housekeeping

is one of the 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.



Many municipal facilities and activities have the potential to negatively impact water quality. Some examples include improper storage of chemicals (left); allowing vehicle washing effluent to enter the storm sewer system (right); improper disposal of hazardous waste; and, improper disposal of debris collected during street sweeping.

BMP #2

Develop, implement, and maintain a written operation and maintenance (O&M) program for all municipal operations 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.



Application and storage protocols for commonly used materials such as road salt (left), herbicides (right), pesticides, and fertilizers can help protect water quality while also reducing costs.

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. This training must occur at least annually and must be documented.

*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 [PADEP's PAG-13 NPDES General Permit for Small Municipal MS4s & EPA's Stormwater Phase II Final Rule Fact Sheet Series](#).

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/Grease
- Toxic Materials
- Organic Materials
- Pesticides



For more information please contact:

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