Cleaning It Up

Presented by:
Kris Stuart,
Stormwater Specialist
SWMPP

- Good Housekeeping
- Pub. Info & Ed
- Pub. Part.
- Post-Const Runoff
- Illicit Discharge
- Const. Runoff
PURPOSE: Reduce pollutants in runoff from construction activities that result in land disturbance \( \geq 1 \) acre
• Preventing soil erosion during construction is essential for protecting streams
Construction Wastes

- Discarded building materials
- Concrete truck washouts
- Chemicals
- Litter
- Sanitary waste
Construction Site Measure
Requirement

- Ordinance to require sediment and erosion control and control of other wastes at construction sites
- Sanctions to ensure compliance
Does your City/Town have an Ordinance?

- RI General Law 45-46-5 is a model ordinance
  - First adopted 20\(^{+/ -}\) years ago
  - Does not include wastes
  - Does include small areas
- Check with your Planning Department
Advocate before your Council

- Common Beef #1: too costly & time-consuming on small lots

- Response: Model has determination of applicability – Building Official can determine plan for insignificant site not needed
Advocate before your Council

- Common Beef #2: unconstitutional infringement on private property rights

- Response: State Regulations and Federal Rules say there must be a local regulatory mechanism to be in compliance with General Permit; no successful constitutional challenge to date
Construction Site Measure Requirement

- Require construction site operators to implement sediment & erosion control program
  - Include BMPs appropriate for conditions at construction site
  - BMPs meet requirements of RI E&S Handbook
Construction Activity General Permit

- Construction activities disturbing 1+ acres must file a Notice of Intent and prepare a Storm Water Pollution Prevention Plan (SWPPP)
- Municipality must require operators to develop and implement the SWPPP
Construction Site Measure
Requirement

- Procedures for plan and SWPPP review
  - Conducted by adequately trained personnel
  - Incorporate consideration of potential water quality impacts
  - 100% of plans must be reviewed
  - Coordinate with State programs
Construction Site Measure Requirement

- Procedures for site inspection and enforcement
  - During construction & after final stabilization
  - Must be conducted by adequately trained personnel
  - 100% of construction sites must be inspected
  - Refer non-compliant operators to the State
Construction Site Measure
Requirement

- Procedures for receipt and consideration of information submitted by the public
Erosion and Sediment Control Techniques

Silt Fence

Hydroseeding

Check dams

Sediment Basin

www.j-hydroseeding.com
Common Problems

- **No Cover**
  - E&S Handbook: Cover if idle for more than 30 days
  - Model Ordinance:
    - Protect November through March
Common Problems

- No sediment controls
Common Problems

- No construction entrance BMP

Stabilized construction entrances allow dirt to be removed from tire treads and collected as trucks leave construction sites.
Common Problems

- No management of solid waste/hazardous materials
Common Problems

- Dewatering not controlled
Common Problems

- Lack of maintenance
Pollution Prevention & Good Housekeeping

- PURPOSE: Prevent or reduce pollutant runoff and runoff volumes from municipal operations
Pollution Prevention & Good Housekeeping Requirement

- *Identify* all operations (activities and facilities) that have a point source or potential point source discharge
Pollution Prevention & Good Housekeeping Requirement

- Develop and implement a program to prevent and reduce pollutant runoff and runoff volumes from facilities owned and operated by the MS4
- (Must include employee training)
Pollution Prevention & Good Housekeeping Requirement

- *Develop* and implement a program to prevent and reduce storm water pollution from operations and maintenance (O&M) activities that have the potential to introduce pollutants to storm water runoff.
Fleet & Building Maintenance

Stormwater System I&M

Good Housekeeping

Park & OS Maintenance

Other Operations
Storm Water System Inspection & Maintenance

- Traditional Purpose:
  - Convey excess water to a safe location

- Additional Purpose:
  - Remove/treat pollutants before they reach a water body
## Storm System O&M Program Goals

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Locate System Components
Maintain catch basins
Control floatables
Inspect outfalls for scouring, sedimentation
Locate, maintain BMPs
Pollution Prevention & Good Housekeeping Requirement

- *Develop* inspection procedures and schedules for long-term O&M of facilities, structural BMPs within the storm system
O&M Program Plan

- Privately-owned BMPs
  - Are private owners aware of their responsibilities?
  - Does the Town have copies of the designs and O&M plans? Where?
  - Does the Town have the right to inspect/maintain private BMPs and bill the owners?
  - Suggestions on how the Town should approach owners?
Maintain road shoulders & ditches
Conduct annual sweeping program
Pollution Prevention & Good Housekeeping Requirement

- Develop and implement an employee training program for
  - Good Housekeeping
  - Pollution Prevention
  - O&M of BMPs
Thanks!

Thanks to:

- US EPA

for their slides