HENDRICK HUDSON CENTRAL SCHOOL DISTRICT, MONTROSE, NY 10548

MS4PY2 STORMWATER PROGRAM

FACT SHEET # 2
MARCH 2012

ONSITE STORMWATER POLLUTANT REDUCTION PROGRAM

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1. Onsite Stormwater Pollutant Reduction Program

Pollution prevention and good housekeeping for district operations is one of six minimum control measures (Minimum Control Measure 6) required under New York State's Municipal Separate Storm Sewer System (MS4) Phase II Stormwater Permit Program. An MS4 is not limited to a system of underground pipes; it can include roads with drainage systems, natural swales, gutters and ditches. The MS4 Phase II Stormwater Permit Program requires an operator of a regulated small MS4 to:

- Design and implement an operation and maintenance program to reduce and prevent discharge of pollutants to the maximum extent practicable from district operations and facilities
- Provide a training component in the program on pollution prevention and good housekeeping techniques in district operations
- Select and implement management practices for pollution prevention and good housekeeping
- Develop measurable goals to ensure the reduction of all pollutants of concern in stormwater discharges to the maximum extent practicable

2. Assessing Existing Programs

Pollution prevention and good housekeeping policies and procedures may already be in place in the District. However, the State recommends that the District conduct a self-assessment of their existing policies, procedures and activities that relate to pollution prevention and good housekeeping. This assessment will serve to identify both strengths and potential gaps or revisions that need to be addressed for compliance with the Phase II Stormwater Permit requirements. The self-assessment should be conducted for each of the principal categories of district operations that comprise Minimum Control Measure 6, which are:

- Winter Road Maintenance
- Stormwater System Maintenance
- Turf Management Practices
- Building and Facilities Maintenance
- Solid Waste Management
- New Construction and Land Disturbance

3. Policies and Procedures Assessment

In March 2012, a Guidelines and Procedures document for District Operations was developed to assist the District in assessing their existing policies, procedures and activities that relate to pollution prevention and good housekeeping. This document will be reviewed by the District on an annual basis to determine if any changes should be made as noted below:

- Are all relevant key items listed under policies and procedures currently addressed?
- What percent of staff are trained in existing policies and procedures?
- Is equipment adequate to maintain proper operations?
- Are certifications being obtained and maintained for third party contractors performing District Operations?

5. Guiding Principles for Stormwater Pollution Prevention

The following series of guiding principles are suggested by NYSDEC in controlling onsite pollutant reductions:

- Prevent pollution at its source
- Manage stormwater runoff and minimize pollutant exposure to storm sewers
- Minimize use of potential pollutants
- Plan for spills and accidents
- Practice preventive maintenance
- Identify potential pollution sources
- Plan new construction to include Stormwater Pollution Prevention Plans (SWPPPs)
- Improve data collection, mapping, and records maintenance
- Train and reward employees
- Improve communications and coordination among all operation and maintenance staff

4. Pollution Prevention Practices

Based on NYSDEC Guiding Principles, the following practices should be adopted by the District:

1. Prevent Pollution at its Source

Controlling pollutants at their source and preventing their release is more efficient and cost-effective than removing them from stormwater runoff. Examples include:

- sweeping streets (abrasives removal, litter, organic debris removal)
- Properly maintaining secondary containment at storage sites
- revegetating eroding slopes
- early capture of hydrocarbons by pretreatment vaults
- Maintenance and management of septic tanks

2. Manage Stormwater Runoff

Prevent stormwater runoff and precipitation from contacting potential pollutants and prevent mixing of runoff with polluted water flows. Examples include:

- structural cover of outside storage containers
- roof drainage management
- site drainage design/runoff diversion
- maximize infiltration of runoff through the use of rain gardens

3. Minimize Use of Potential Pollutants

Examine district use of all chemicals and other potential pollutants and identify methods of eliminating, reducing or better targeting their use in district operations and facilities (including alternative products). Examples include:

- reduced or alternative pesticide use
- reduced fertilizer use
- reduced road salt and abrasives use
- reduced or alternative exterior cleaning product use

4. Plan for Spills and Accidents

Develop spill prevention and response policies and procedures for ALL facilities that use or store chemicals (not just petroleum). Examples include:

- provide secondary containment
- equip facility to handle any size of spill
- assign responsible person/team for response
- post procedures and emergency contacts

5. Practice Preventive Maintenance
Regularly inspect components of stormwater collection, conveyance and treatment system; regularly inspect machinery, pipes, storage tanks and other equipment for leaks or worn parts; regularly calibrate application equipment (salts, pesticides, fertilizers); plan for system upgrades and component replacements and repairs. Examples include:

- containment of minor leaks and spills with drip pans, absorbent pads
- use of dry cleanup methods rather than washing
- establish inspection calendar and incorporate into records/data system
- establish equipment maintenance and calibration calendar and incorporate into records/data system

6. Identify Potential Pollution Sources
Identify all district facilities and operations that could impact stormwater quality; identify potential pollution sources at each site or for each activity; identify, map and inspect the facility's stormwater drainage system. Examples include:

- all material storage sites, especially those with any outside loading or unloading operations
- all fueling sites
- all drainage structures and components
- all sites with animal waste concentrations
- pesticide/fertilizer application areas

7. Plan New Construction to include Stormwater Pollution Prevention Plans
Include a stormwater pollution prevention Plan (SWPPP) in all new district facilities and construction activities; site new facilities to minimize waterbody impacts. Examples include:

- minimize impervious surfaces
- maintain stream buffers
- infiltrate runoff (rain gardens)
- eliminate pollutant exposure
- provide spill containment measures and structural stormwater management practices

8. Improve Data Collection, Mapping, and Records Maintenance
Emphasize improvement of data collection and records maintenance to address higher priority pollution sources and contaminants; improvement of geographic information; and unification of data management across all relevant district departments and operations. Examples include:

- incorporate geographic information systems (GIS) into pollution prevention planning
- maintain chemical usage data (pesticides, fertilizers, salts, solvents, etc.)
- maintain inspection, repair, maintenance records
- integrate records maintenance across departments, based on priorities (e.g., pesticide usage)

9. Train and Reward Employees
Train employees regarding stormwater pollution and prevention practices; identify emergency contacts and reporting procedures; seek employee ideas on pollution prevention methods and priorities; reward employees who participate in prevention program. Examples include:

- general education on importance of stormwater pollution control to all employees
- targeted training on policies, procedures and best management practices for maintenance staff
- retraining and continuing education on routine basis for maintenance staff
- bulletin boards, web postings or other options for news and updates
- establish and continue employee rewards or recognition program

10. Improve Communications and Coordination
Emphasize communication and coordination across key district departments and operations; coordinate stormwater and pollution prevention activities with county and state agencies, organizations and institutions; develop public outreach programs. Examples include:

- participate in County Water Quality Coordinating Committee and local town/village MS4 meetings