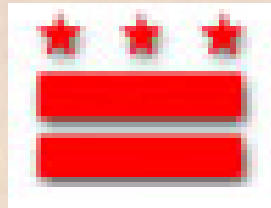


# Stormwater Pollution Prevention Plans and Best management Practices (BMP) Maintenance



District Department of the Environment  
September 6, 2012



# Stormwater Pollution Prevention

## Why address stormwater, why it's a problem?

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- Water pollution begins on the land surface – so that's where the focus is best targeted: *preventing pollution in the first place.*
- SWPPP are more than just a paper plan – it's a living, firm commitment to clean up everyday practices at each facility.
- As described by the District of Columbia Ms4 permit Vehicle Maintenance /Material Storage Facilities and Municipal Operations are required to eliminate illicit discharges.



Stormwater BMP in need of service –filled with debris and motor oil- poor house keeping results in the need for frequent maintenance service



Time for a cleaning.



Vacuum trucks are the best method of cleaning vaults and chambers of storm water BMPs.





# Maintenance service to a underground storm water management facility



# What are SW Pollution Prevention Plans?

**Definition:** Pollution Prevention is the use of materials, processes, green procurement, and/or practices that reduce or eliminate the creation of pollutants or wastes at the source.

P2 IS A LEGAL REQUIREMENT OF OUR MS4 PERMIT (and legal requirements of many other federal laws: Clean Water Act, RCRA, Superfund, TSCA, FIFRA, Clean Air Act, etc.)

And,

THERE SHOULD BE CLEAN PRACTICES USED EVERY DAY, ROUTINELY AT EVERY DC FACILITY – CLEAN SHOULD BE THE NORM. EPA IS PAYING ATTENTION.

Each agency should have been using aggressive and practical pollution prevention methods ('good housekeeping') all along – to address all potential pollutant sources, measures, controls at each





This is not an acceptable method of cleaning service vehicles



# Objectives of a Plan

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A Stormwater Pollution Prevention Plan (SWPPP) is meant to achieve 3 primary objectives:

- Assure compliance with the DC MS4 Stormwater Permit (EPA conducts unannounced audits at any time – they *can* levy fines); and, DDOE conducts routine maintenance & operation inspections.
- Identify potential sources of pollution associated with the activities at a facility which may affect the quality of stormwater discharges
- Describe & have commitments for daily best practices & good housekeeping measures for each facility.



**Open unlabeled barrels exposed to the elements are not an acceptable practice**



# Who Does What?

- Each agency should begin with an inventory of their facilities, prioritized based on potential to pollute.
- Each agency should work with DDOE to develop a draft (then final) Plan for approval by DDOE. If using a consultant, then DDOE will work directly with each consultant.
- Each plan outlines the details of how you will handle/manage waste and pollutants: motor oil, anti-freeze, petroleum, solvents, etc.
- Each facility should begin with a comprehensive audit, then schedule routine inspections, prepare an annual report on findings of the inspections; DDOE issues maintenance notices based on their inspection findings.
- USEPA and DDOE conduct periodic inspections; EPA *can* levy fines for poor housekeeping and illicit discharges.
- SWPPPs are basically a firm commitment (by SWAP members) to adopt Good Housekeeping practices and best management practices in/around each facility.
- DDOE will continue to provide training every year.



**leaking oil contributes to contaminated storm water run off**





# Components of a SW Pollution Prevention Plan

- Basic Facility info, including a site map
- Inventory of Pollutant Sources
- Record of Leaks and Spills
- Non-Storm Water Discharges
- Best Management Practices
- Reporting & Recordkeeping
- Good Housekeeping Measures
- Primary Responsible Contact



# Who is liable for non-compliance?

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- You & your agency
  - Staff
  - Facility supervisors
  - DDOE (as SW Administrator)
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- Can result in civil or criminal violations
  - One way to comply is to use Environmental Management Systems for tracking activities.







**Stock piles of collected debris requires protection from exposure to rainwater**

# What else we need to know...

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- The City is only as clean as its surrounding facilities. How your shop functions *directly* impacts the water and the Anacostia River or Rock Creek. Title 21 of DCMR 534.2 applies.
- Follow the approved maintenance schedule for the on site stormwater BMPs
- Include scheduling annual maintenance and operation inspection for the SWM BMPs as part of your facility P2 plan.
- We can all operate a lot cleaner! Please ACT now, don't wait for a plan.



# We're Ready to Help

DDOE contacts:

Diane Davis

Pollution Prevention Coordinator

diane.davis2@dc.gov (202) 741-0847

Walter K. Caldwell

Environmental Protection Specialist

walter.caldwell@dc.gov (202) 497-8238