

# Section 8

## Control Measure 6: Pollution Prevention/ Good Housekeeping for Municipal Operations

### 8.1 Introduction

The Pollution Prevention/Good Housekeeping for Municipal Operations control measure is for the development and implementation of a program to prevent or reduce pollution in stormwater runoff from municipal operations. The program must include municipal staff training on pollution prevention measures and good housekeeping techniques.

### 8.2 Requirements

To comply with Control Measure 6, the City must “develop and implement a program with a goal of preventing and/or reducing pollutant runoff from municipal operations.”

The program for this control measure should include:

- Employee training,
- At a minimum, maintenance activities, with schedules, for parks and open space, fleet maintenance, building maintenance, new construction and land disturbance, roadway drainage system maintenance, and stormwater system maintenance, and
- Inspection procedures and schedules for long-term structural controls (See Control Measure 5).

### 8.3 Existing Best Management Practices

The City already performs many of the pollution prevention/good housekeeping best management practices that fulfill the requirements of Control Measure 6 including frequent street sweeping and catch basin cleaning; proper salt storage and application; vehicle maintenance and washing procedures to avoid stormwater pollution; and park landscape maintenance activities designed to minimize pollutant discharges. Accordingly, the City will continue many of its existing practices.

### **8.3.1 BMP #6-1: Continue to Sweep Streets Two Times Annually**

*Description:* The City will continue to sweep streets two times annually.

*Measurable Goal:* Sweep all streets in City.

*Schedule:* Two times annually.

*Responsible department:* Department of Public Works

*Cost:* It is estimated that 16 hours per year may be necessary for record keeping. There are no additional costs as this is an existing program.

### **8.3.2 BMP #6-2: Continue Catchbasin Cleaning Program**

*Description:* The City will continue to clean catchbasins from spring to fall. Catchbasins are typically cleaned once every two years on a rotating schedule. Problematic catchbasins (i.e. at the bottom of hills or in flood prone areas) are cleaned more frequently.

*Measurable Goal:* Percentage of catchbasins cleaned annually.

*Schedule:* Spring to fall of every permit year.

*Responsible department:* Department of Public Works

*Cost:* It is estimated that 16 hours per year may be necessary for record keeping. There are no additional costs as this is an existing program.

### **8.3.3 BMP #6-3: Continue Salting and Snow Removal Practices**

*Description:* The City will continue to minimize the use salt for road deicing in sensitive areas (i.e. Horn Pond area). The City will also continue to store the salt in a covered salt shed. Currently, the City calibrates its salt spreaders as needed, and alternative deicing methods, such as the use of liquid calcium chloride, is used in some areas. Snow that is removed from certain areas is taken to a park that is not near wetlands and the runoff is contained on site until it percolates into the ground.

*Measurable Goal:* Continue existing practices.

*Schedule:* Throughout permit term.

*Responsible department:* Department of Public Works

*Cost:* Estimated at 8 hours per year for record keeping. No additional costs for existing program.

### **8.3.4 BMP #6-4: Continue Hazardous Waste Response Program**

*Description:* The DPW garage and water treatment plant currently follow a Spill Prevention Control and Counter Measure Plan, in accordance with 40 CFR, Part 112. The plan includes training for employees and spill kits located around the buildings.

*Measurable Goal:* Continue existing program.

*Schedule:* Throughout permit term.

*Responsible department:* Department of Public Works

*Cost:* No additional costs for existing program.

### **8.3.5 BMP #6-5: Continue Vehicle Washing Practices**

*Description:* Most City vehicles are washed at a local private car wash facility. Oversized vehicles (City trucks, etc.) are sprayed clean (without soap) on a lot (adjacent to the DPW yard) where runoff is contained and percolates into the ground.

*Measurable Goal:* Continue existing practices.

*Schedule:* Throughout permit term.

*Responsible department:* Department of Public Works

*Cost:* No additional costs for existing program.

### **8.3.6 BMP #6-6: Continue Vehicle Maintenance Practices**

*Description:* The City currently performs municipal vehicle maintenance, including police vehicles, within a garage which consists of oil and grease traps, and an oil / water separator.

*Measurable Goal:* Continue existing practices.

*Schedule:* Throughout permit term.

*Responsible department:* Department of Public Works

*Cost:* No additional costs for existing program.

### **8.3.7 BMP #6-7: Continue Maintenance Activities at Parks and Open Space**

*Description:* The City will maintain its current BMPs at parks and open space, which includes a tree planting program (BMP #2-5) and pet waste control (BMP #1-3). The City will also continue to minimize the use of fertilizers near Horn Pond and the Aberjona River, which are on the 303(d) list for organic enrichment.

*Measurable Goal:* Continue existing practices.

*Schedule:* Throughout permit term

*Responsible department:* Department of Public Works

*Cost:* No additional cost to the City.

## **8.4 Additional Best Management Practices**

The following pollution prevention / good housekeeping BMPs will be performed in addition to the City of Woburn's current practices to enhance compliance with Control Measure 6:

### **8.4.1 BMP #6-8: Develop/Implement Employee Education Program**

*Description:* The City currently provides training for employees when hired. This program will be expanded to include topics relevant to stormwater quality, such as looking for illicit connections, hazardous material handling and storage, minimizing chemical application to lawns at parks and open space, equipment maintenance and repair, etc., for public works employees. Training will target employees who impact the MS4 (i.e. field crews) with minimal training given to other employees such as secretaries and non-DPW employees.

*Measurable Goal:* Four hours of training on stormwater related topics for public works employees during the permit term.

*Schedule:* Four hours of training by the end of the permit term.

*Responsible department:* Department of Public Works

*Cost:* It is estimated that City staff will spend about 16 hours preparing documents and a presentation during the training period, in addition to the time spent by staff in during the four hours of training during the permit year.