

1.0 GUIDE INTRODUCTION

1.1 Purpose & Intended Use of Document

This document is guidance for developing or enhancing a Pollution Prevention and Good Housekeeping (P2&GH) Program to comply with Indiana's Rule 13 which meets the National Pollutant Discharge Elimination System (NPDES), Municipal Separate Storm Sewer System (MS4), Clean Water Act permitting requirements. It represents the collective work product of the Indiana Association for Floodplain and Stormwater Management's (INAFSM) Stormwater Committee's P2&GH Group. This group has 16 members representing many different Phase II MS4s entities throughout the state of Indiana.

Sections of this document correspond with the requirements of Indiana's Rule 13 (327 IAC 15-13) as of July 2015; however, implementing the procedures described in this document does not constitute compliance with the Rule. Compliance can only be determined by the Indiana Department of Environmental Management (IDEM). Any questions about Rule 13 compliance should be addressed to the IDEM Stormwater Program MS4 Coordinator.

1.2 Target Audience

Although the primary audience for this document is Indiana's regulated MS4 entities, others such as non-regulated Counties, Cities, Towns and consultants, may also benefit from a greater understanding of the P2&GH program.

1.3 How to Use the Guide

When entities are using this guide, it is important to keep in mind that all of the activities and best management practices (BMPs) listed in this document should be scaled appropriately for each MS4 or other entity type and size. Not all entities look exactly alike so programs should not look exactly alike. The MS4 permit is implemented in continual five year cycles so items can be budgeted and completed over the span of a permit cycle. Implementing P2&GH BMPs must involve and engage multiple departments and staff.

Each section is set up in a manner that identifies the requirement and cites the regulation. The general "Implementation BMPs" describe the measures an MS4 should implement to be in compliance with the regulation. The "Programmatic Indicators" identified relate to the items in the regulations that are required to be tracked. The "Possible Measureable Goals" section relays some ideas on what items could be tracked as part of an MS4 program. The "Advanced BMPs" describe practices an MS4 could implement to improve the overall program. "Advanced BMPs" are optional. The "Additional Resources" section identifies documents and websites that provide good information on that section's subject matter. General sources and definitions are provided at the end of this guide.

1.4 MS4 Common Challenges to P2&GH Program Implementation

Common challenges to implementing the P2&GH program throughout the state of Indiana include:

- Lack of communication and/or cooperation between departments.
- Staff lacks an understanding of the program and need training.
- Lack of resources – financial and staffing.
- Departments who have the greatest need for P2&GH implementation are typically very busy with other essential, critical activities such as ice control and snow removal or brush collection.

- Lack of program support from management.
- Lack of program implementation on a consistent basis.

1.5 Tips for Achieving Consistent, Long-term Program Implementation

In order to overcome the challenges listed above, MS4 entities must do their best to make their program work for them on a consistent, long-term basis. Consistent repetitions of implementing program activities can help towards making these activities part of an entity's routine. For example, holding training sessions at a consistent time of day and year, every year, or routinely conducting self-inspections can firmly establish these program items as mandatory items that must be and are expected to be completed.

1.6 Other Programs that Overlap With the P2&GH Program

Even though the Clean Water Act and NPDES programs require P2&GH activities to be implemented, these activities do overlap with other regulatory and non-regulatory programs:

- IDEM Rule 6 – industrial NPDES stormwater permits may be required for certain activities such as Waste Transfer Stations, Small Airports, etc.
- IDEM Land Quality – Solid & Hazardous Waste Management – includes composting, stockpile, and waste stream management; Resource Conservation and Recovery Act (RCRA) governs the management of hazardous wastes.
- Spill Prevention, Control, and Countermeasure (SPCC) Rule – this federal rule applies to bulk petroleum product storage in containers 55 gallons and greater.
- Emergency Planning and Community Right-to-Know (EPCRA) – this rule requires facilities with certain quantities of chemicals to report the chemicals, amounts, and storage practices to the State and local emergency response agencies.
- Indiana Spill Rule – describes the response actions an owner needs to implement in the event of a spill.
- Fire Codes – apply to Flammable and Safety Cabinets and the storage of ignitable, combustible, and explosive materials.
- OSHA – safe workplace standards may be violated if materials are not stored or managed properly and lead to staff work accidents.
- Sanitary and Combined Sewer – source control to avoid substances going to these systems.
- Drinking Water Protection – Ground Water, Surface Water – source control to avoid substances going to these systems.
- Office of the Indiana State Chemist – pesticide and fertilizer storage and application.
- Health Department – vector control issues.
- IDEM Water Quality and Army Corps of Engineers – includes permits for working within drainage ditches, waterways, wetlands, and lakes.
- Indiana DNR Regulatory Programs – Flood Control Act (1-2-3) – includes fill and disturbance within a floodway.

Entities should further investigate the above programs for a better understanding of them including specific requirements for each and how they may or may not apply.

1.7 Other Benefits to Implementing P2&GH

Entities that implement a P2&GH program can derive other benefits besides simply meeting MS4 permitting compliance. For example:

- Increased community awareness – MS4 staff that have an increased awareness of stormwater management and water quality programs also serve as informed public citizens that can positively influence their neighbors.
- Supporting public education and participation programs – MS4 staff can play a large role in helping to support other MS4 public education and participation programs such as participating in clean up events and workshops.
- Setting a good example – MS4 staff that implement successful P2&GH programs are setting a good example for their citizens to “do the right thing” to help our environment.
- Recognized Community Stewardship – according to the Center for Watershed Protection, when all staff in the MS4 area embrace the stormwater management program, the MS4 is in a much better position to influence residential behaviors that can positively impact water quality. Residents do notice the actions of staff when they are on the job in the community.
- Cross-training to support other MS4 programs – knowledgeable staff that have been properly trained and involved in the MS4’s P2&GH program, are more likely to assist with supporting other programs such as helping to identify illicit discharges when they are out working in the community.
- Building Inter-Departmental Relationships – working closely with other departments to implement an MS4’s P2&GH program helps to foster better working relationships which adds to staff “buy-in” or acceptance and support of MS4 programs.
- Reduced Infrastructure Stress – if separate storm inlets and conveyances are properly maintained on a routine basis, then less overall burden and stress is placed on the separate storm system which can help increase the life span of pipes and ditches thereby reducing costs.
- Improved Staff Efficiencies – the use of written procedures that identify the specific stormwater conveyance system maintenance required, along with defined maintenance intervals and zone maps, can lead to a more efficient use of manpower resources and improved time management.
- Resource Management Savings – if material is stored and managed properly, then entities will achieve less product waste.
- Inventory Control – by managing an entity’s inventory, this can reduce costs by minimizing the amount of material used and lost. For example, dating materials based on purchase dates and properly rotating supplies, avoids exceeding shelf life expiration dates.
- Pollutant Source Control – properly managing materials and their associated pollutants at the source, results in tangible cost savings. For example, if materials such as chemicals go to a wastewater treatment plant because they were poorly managed, then the entity has increased costs associated with operating that treatment plant and cleaning up the spilled chemical. If these same chemicals go to a storm drain, then this is a violation of the MS4 permit.
- Water Quality Improvement – the ultimate goal for any Clean Water Act permit program is to help with improving overall water quality in our local, state, and national waterbodies. Once staff understands the important role they play in helping your MS4 entity with working towards this goal, your P2&GH program is more likely to be successful.