



**CITY OF BELLEVUE**  
**STORM WATER MANAGEMENT PROGRAM:**  
**FACILITIES RUNOFF CONTROL PLAN (FRCP)**  
**PROGRAM**

*Prepared for:*

**City of Bellevue**  
MS4 Storm Water Program

August 2021

# Facilities Runoff Control Plan (FRCP) Program

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# *Facilities Runoff Control Plan (FRCP) Program*

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## **1.0 Program Overview**

As a regulated Municipal Separate Storm Sewer System (MS4), the City of Bellevue (City) is required to develop and implement an operation and maintenance program that includes a training component and has the ultimate goal of preventing or reducing pollutant runoff from agency operations. The developed program includes employee training to prevent and reduce stormwater pollution from activities at facilities listed in **Attachment A**. Facility Runoff Control Plans (FRCP) are one tool used by the City to comply with these requirements.

Maintenance facilities operated by the City serve as a base for maintenance operations providing many important services such as, but not limited to, snow removal and ice control, street and bridge maintenance, landscaping and mowing, fleet maintenance and repair, fueling operations, signal and lighting repair, sign maintenance, animal removal, pickup of roadway litter and debris household hazardous waste collection and sewer maintenance. These operations mostly occur inside of the regulated MS4 permit boundary.

A FRCP provides the City maintenance facility staff with a comprehensible approach to protecting the quality of stormwater leaving a maintenance facility using good housekeeping and pollution prevention Best Management Practices (BMP). The Good Housekeeping/Pollution Prevention goals for this effort include:

- ▶ Reduce the risk of discharging targeted pollutants into a storm drain system that may contaminate waterways from maintenance facilities.
- ▶ Inform and educate maintenance facility staff about the personal actions recommended for managing target pollutants within individual facilities.
- ▶ Track on-going pollution prevention and good housekeeping efforts conducted at each facility in order to quantify effectiveness of stormwater protection.
- ▶ Demonstrate compliance with the program, including training, to reduce pollutant runoff from maintenance facilities.
- ▶ Maintain consistency with existing environmental stewardship efforts and regulatory compliance obligations fulfilled at each facility.

This FRCP development document is divided into the following sections:

- ▶ **Section 2.0** provides an overview of the FRCP documents and development process.
- ▶ **Section 3.0** describes the maintenance facility good housekeeping and pollution prevention target pollutant categories.
- ▶ **Section 4.0** describes how FRCP elements will be developed and implemented over time.

## 2.0 Facility Runoff Control Plans

### 2.1 Overview

A Facility Runoff Control Plan (FRCP) is a living document that provides stormwater quality education, facility inspection, and corrective action guidance for City maintenance facility staff. Facility staff use the site-specific information provided in the document to identify potential target pollutants and sources. Good housekeeping and pollution prevention methods are recommended which are largely based on personal actions and planning efforts described as non-structural Best Management Practices (BMPs). The primary focus of a FRCP is encouraging implementation of effective non-structural BMPs.

### 2.2 Plan Elements

A Facility Runoff Control Plan (FRCP) is developed from a standardized selection of target pollutant information (Section 3.0) and is tailored to target the potential pollution sources and discharge locations at each facility. To keep information organized, a FRCP is kept in a three-ring binder at the maintenance facility it was developed for. Site specific details in the FRCP include the following information:

- ▶ A **Title Page** that identifies the facility name and the date of the most recent version;
- ▶ A **Vicinity Map** that identifies adjacent land uses and receiving waters;
- ▶ An **Overview** of the major facility operations;
- ▶ A **Responsibility Chart** and **Reporting Procedures**;
- ▶ Identification and description of **Target Pollutants** and **Pollutant Sources**;
- ▶ A **Site Map** that corresponds with the **Inspection Checklist** and **Instructions**; and
- ▶ Blank **Corrective Action Logs** for completion with facility Inspection Checklists.

### 2.3 FRCP Development Team

The FRCP Development Team represents a small group of individuals from the City's Public Works Department and third-party consultants, as needed, charged with the responsibility of maintaining consistent standards. The Team is responsible for evaluating each facility, educating and training facility staff, developing the FRCP document, and monitoring implementation of the FRCP.

### 2.4 Development Process

Development of each FRCP requires preparation, data collection when on-site, and timely follow-up. A description of the development process is described below.



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- ▶ **Facility Contact and Scheduling (Section 2.4.1)**
  - Notify Department Supervisors of intended facilities to inspect.
  - Contact the main facility personnel as designated by the Department Supervisor.
  - Schedule initial facility visit and basic stormwater education session.
  - Complete desktop assessment of facility to prepare for facility visit.
- ▶ **Facility Evaluation (Section 2.4.2)**
  - Mobilize FRCP Development Team on-site and explain the development procedures to key City personnel.
  - Complete a Facility Evaluation Questionnaire for information about the facility.
  - Complete a walkthrough of the entire facility, asking questions along the way, taking additional notes and digital photographs using the photo checklist.
  - Schedule the next visit and identify staff members who must attend to be trained as qualified inspectors.
  - Provide Basic Good Housekeeping/Pollution Prevention Education for all facility staff whenever possible.
- ▶ **FRCP Implementation and Updates (Section 2.4.3)**
  - Compile all information gathered into a FRCP document.
  - Within two (2) weeks of the inspection, mobilize the FRCP Development Team and introduce the document to all the facility staff who will become qualified inspectors.
  - Use the current site map, inspection checklist, and Corrective Action form to teach the qualified inspectors how to conduct the facility inspections.
  - The FRCP Development Team identifies any revisions that need to be made to the FRCP before submitting the updated document to the Facility.
  - Provide a Question-and-Answer session with Facility staff before leaving the site.
  - The Main Site Contact(s) may make minor additions/revisions by writing on the current document.
  - The FRCP Development Team may provide assistance to make revisions to the current document when there have been significant changes to the facility.

### **2.4.1 Facility Contact and Scheduling**

The FRCP Development Team contacts the Department Supervisors and Main Site Contact(s) to schedule a facility visit and staff education. Basic information is collected from the Main Site Contact(s) about the facility location, operations, and staff. Between the initial contact and the site visit, a desktop analysis is conducted to ensure the visit is efficient for everyone involved. The desktop analysis identifies helpful information such as a site map, nearest receiving waters, an organization chart, preliminary list of target pollutants, and recommended inspection questions about the management of such pollutants.

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### **2.4.2 Facility Evaluation and GH/PP and Stormwater Education**

The FRCP Development Team conducts an initial evaluation of the facility to obtain information necessary for developing the facility specific FRCP. The majority of the facility evaluation is conducted with staff that has been selected to be involved in continuous implementation of the FRCP recommendations. A Facility Evaluation Questionnaire is completed to ensure all relevant information is collected. The facility evaluation visit should also include an introductory educational presentation for all facility maintenance staff (discussed further in Section 4.5.1) and a facility walkthrough.

The facility walkthrough is conducted to provide the FRCP Development Team an opportunity to ask questions about specific site conditions as well as propose hypothetical housekeeping issues to determine how the facility is operated and maintained. The walkthrough is a good time to allow facility staff to ask questions about alternative good housekeeping/pollution prevention techniques that may be of interest. The FRCP Development Team documents the site thoroughly with field notes and digital photographs for reference back at the office. Following the walkthrough, the group completes all remaining information on the Facility Evaluation Questionnaire, ensuring that the facility evaluation is consistent and comprehensive. The visit is concluded by fielding any lingering staff questions and scheduling the next site visit.

### **2.4.3 FRCP Implementation and Updates**

The FRCP Development Team continues to develop the FRCP using information collected during the site visits. In order to keep the development process on track, the FRCP is updated within two (2) weeks of a facility visit by the FRCP Development Team. The FRCP includes defining the facility inspection areas, coordination of inspection questions, and confirmation of target pollutants of concern based on actual site conditions. The FRCP also includes information specific to each facility such as existing references, procedures, and/or classifications to ensure the document is relevant.

The FRCP Development Team returns to deliver the FRCP and to conduct FRCP Inspector Training (discussed further in Section 4.5.2). All individuals who will be responsible for conducting FRCP inspections must attend the training. The FRCP is used as the training material for FRCP Inspector Training. This method allows the FRCP Development Team to introduce facility staff to the individual FRCP features during the training.

The FRCP Development Team conducts the first official site inspection with the site inspectors, allowing them to get a feel for the FRCP and learn the expectations for documentation and verification of Corrective Actions. The visit concludes the first official inspection with a question-and-answer session with staff. All staff members completing the FRCP Inspector Training are considered Qualified Inspectors and must sign the FRCP document following the training.

The FRCP Development Team makes all revisions to the document and will send updated pages to the facility with a new revision number and date listed on the cover sheet. The FRCP is continually maintained on-site, and copies of inspection records are not submitted to the FRCP Development Team, but kept in the facility binder.

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Updates to the FRCP can be made for various reasons. There is currently no permit requirement for the frequency of updating an FRCP on a regular basis. Each FRCP should reflect the current conditions on-site. Any substantial changes to the facility, staff, procedures, or materials used after the FRCP has been finalized must be noted by hand in the FRCP until a revised edition can be made. All revisions in the FRCP should be initialed and dated in the facility's master copy of the FRCP.

## 3.0 Maintenance Facility Target Pollutant Identification

The FRCP is developed with the primary focus placed on enabling facility staff to identify potential problems and take actions that reduce the risk of stormwater pollution. The first step in this process is to identify the common target pollutants found at maintenance facilities. Every facility has unique conditions and target pollutants, but Section 3.1 identifies the common target pollutants that can be anticipated at most facilities. The second step is to connect maintenance facility activities with the potential to discharge these target pollutants. Section 3.2 identifies the five target pollutant categories used in each FRCP. *Table 1* displays the key maintenance items and specific activities that can create and cause target pollutants to contaminate stormwater.

*Table 1: General Maintenance - Facility Target Sources and Pollutants*

TARGET SOURCES	TARGET POLLUTANTS
Waste Material	Toxic Chemicals
Product Material	Trash and Debris
Building and Grounds	Sediment
Vehicles and Equipment	Heavy Metals
Storage Tanks	Chloride
	Pesticides
	Petroleum Fluids
	Nutrients
	Pathogens
	pH

### 3.1 Target Pollutants

#### 3.1.1 Petroleum and Vehicle Fluids

Petroleum products (e.g., gasoline, diesel fuel, motor oil and other lubricants), antifreeze, and hydraulic fluids are common pollutants deposited on the ground at maintenance facilities. Many of these products may contain special additives, which may be toxic to humans and aquatic life. Potential sources of these products at maintenance facilities include leaks from vehicles and machinery and vehicle maintenance activities such as fueling, changing oil and washing.

#### 3.1.2 Pesticides

A pesticide is a chemical agent designed to control pest organisms. The most common forms of pesticides are organic chemicals designed to target insects (insecticides) or vascular plants (herbicides). Pesticides are routinely detected in surface waters largely because water is one of the primary media in which pesticides are transported from targeted applications – the pest – to non-intended parts of the environment. Using pesticides for chemical weed control and integrated pest management activities requires storage at maintenance facilities which can become a potential source of pollution if managed improperly.

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### **3.1.3 Metals**

Dissolved and suspended metals are found in stormwater runoff above a certain threshold may harm aquatic life. These metals come from various sources and activities, including fuel combustion, brake pad wear (copper), tire wear (cadmium and zinc), metal corrosion, pressure-treated wood and creosote posts used for guard rails (arsenic), paints, herbicides and other materials. Maintenance facilities become a central location for much of the materials and equipment that can be a source of dissolved and suspended metals in stormwater.

### **3.1.4 Sediment**

An amount of sediment transported by stormwater in excess of natural concentrations is considered a pollutant. Additionally, potential pollutants (e.g., metals and nutrients) attached to sediment particles are transported with the sediments to receiving waters and increasing the potential for water quality impacts. Potential sources of sediment in runoff from maintenance facilities include tracking, transport and storage of loose bulk materials (e.g., sand or other aggregate), grading-related activities un-vegetated soils, and soil erosion.

### **3.1.5 Litter and Debris**

Litter and debris in stormwater accumulate in the manufactured form of paper, aluminum cans, styrofoam, plastic waste products and other items commonly discarded inappropriately. These pollutants can be transported by wind and stormwater into the storm drainage system. Litter and debris is often brought to maintenance facilities after street sweeping, storm drain maintenance, and right-of-way cleanup activities. Litter in surface waters can inhibit the growth of aquatic vegetation, harm aquatic organisms by ingestion or entanglement, convey other pollutants, such as toxic substances and cause aesthetic problems on shorelines of ponds and lakes. In addition to impacting water quality, these items may obstruct the stormwater drainage system and cause property damages.

### **3.1.6 Nutrients**

Nutrients include any substance taken up by living things to promote growth. The term generally applies to nitrogen and phosphorus, but is also applied to other essential trace elements less commonly used. Excessive amounts of nutrients that make their way to receiving waters can over-stimulate the growth of aquatic plants causing extreme algal blooms leading to low dissolved oxygen levels and can result in fish kills, foul odors, and limited public use. Some of the possible sources of nitrogen and phosphorous from maintenance facilities include storage of fertilizers, decaying plant materials from tree trimming, vegetation management surfactants and emulsifiers and natural sources such as the mineralized organic matter in soils.

### **3.1.7 pH**

The pH of a water sample is a measure of its acidity (acid) or alkalinity (base). Water that is acidic or alkaline may causes harm to aquatic organisms or consumers of the water, and may even result in damage to equipment and materials. Maintenance activities that may change the

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pH of runoff include the storage of batteries holding battery acid, parts washing and management of concrete wastes.

### **3.1.8 Pathogens**

Pathogenic microorganisms, such as viruses and bacteria, can be extremely variable in natural conditions making them difficult to measure and control. A group of pathogenic microorganisms known as coliform is commonly measured as an indicator of the potential presence of pathogens with fecal origin which can cause significant health issues in humans and other water consumers. Sources of total and fecal coliforms in stormwater runoff are everywhere (e.g., soil microorganisms, wild and domestic animal droppings, etc.). Maintenance facilities must control specific sources of coliform from any animal wastes, non-permitted sewer connections to a storm drain or receiving stream, seepage from septic tanks and spillage from portable toilets.

### **3.1.9 Chlorides and Sulfates**

Winter roads maintenance requires the use of chemicals and abrasives in large enough quantities to keep roadways safe for travel. Maintenance facilities store large quantities of sand and salt in preparation for use during storm events. To prevent salts from caking, a variety of chemicals are added to the stockpiles. Chlorides and sulfates are all dissolved substances that may be toxic to receiving waters in strong enough doses. Chlorides and sulfates will typically runoff during rain events from unmanaged maintenance facilities eliminating stream channel vegetation which is essential for a healthy aquatic ecosystem and the prevention of stream bank erosion.

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### 3.2 Target Source Categories

Target pollutants are generated from one of five potential sources that occur at maintenance facilities. Using appropriate Best Management Practices (BMPs) for each of the sources depicted in *Figure 1* and described below helps ensure that all potential pollutants are addressed.



Figure 1: Pollutant Sources & BMPs

#### 3.2.1 Building and Grounds Maintenance

Maintenance facilities require building and grounds management, which includes care of landscaped areas around each facility, cleaning of parking areas and pavements, and maintenance of the stormwater drainage system. Tasks to perform these activities include equipment operation, litter/trash pickup and maintenance landscaping, which can in turn result in spills, leaks, trash, sewage, erosion and chemical vegetation control. Potential target pollutants could include sediment, litter, trash, sewage, pesticides, fuel, hydraulic fluid and oil. **Buildings and grounds must be maintained in a manner that reduces the risk of discharging pollutants to the stormwater drainage system.**

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### **3.2.2 Vehicle and Equipment Management**

Maintenance facilities are the primary staging areas for all vehicles and equipment used to operate and maintain roads and properties owned by the City. All vehicles and equipment require operation and management of some type, which may include storage, fueling, cleaning, maintenance and repair. Haphazard management actions can quickly lead to substantial spills, leaks, and non-stormwater discharges. **Vehicle fluids at fueling areas as well as equipment washing, storage, and maintenance areas must be managed to reduce the risk of discharging pollutants to the stormwater drainage system.**

### **3.2.3 Storage Tank Management**

Bulk storage tanks full of stock products are a typical feature of most maintenance facilities and they generally come in all shapes and sizes. Substances contained in storage tanks may include soil stabilizers, dust suppressants, herbicides, fertilizers, de-icing chemicals, fuels, lubricants and other petroleum products. A Spill Prevention Control and Countermeasure (SPCC) plan may be in place to reduce the risk of pollution from certain petroleum products, but all bulk storage tanks generate a certain level of risk of discharge to adjacent drainages and receiving waters. **Storage tanks must be protected and maintained in a manner that reduces the risk of discharging pollutants to the stormwater drainage system.**

### **3.2.4 Waste Material Management**

Activities at maintenance facilities generate many types of wastes that accumulate or may be discharge into the environment. Types of wastes that must be managed include construction salvage materials such as rubble, fencing, soil, aggregate; recyclables such as scrap metal, tires, spent partswasher solvent, used oil, and used batteries. Waste materials can also include trash and debris, empty product containers, and rinse water. Personnel need to reference the Department-specific procedures or the City's standard guidance regarding waste handling to determine the appropriate methods for managing all types of waste. **Both hazardous and non-hazardous wastes must be managed to reduce the risk of discharging pollutants to the stormwater drainage system.**

### **3.2.5 Product Material Management**

Maintenance facilities store a large variety of products that could be harmful to the environment if they come into contact with surface waters. Materials that may be stored include pesticides, petroleum products, paints, concrete and asphalt products, and solvents. Storage and handling practices that minimize exposure of these materials to stormwater can significantly minimize the potential for receiving water contamination. Large stockpiles of materials located on maintenance lots require responsible management just as much as products that are stored indoors or under cover. **All product materials must be managed to reduce the risk of discharging pollutants to the stormwater drainage system.**

Suggested BMP practices for Building and Ground Management, Vehicle and Equipment Management, Waste Materials Management, and Product Material Management are found in **Attachment D.**



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## 4.0 Continuous Implementation

### 4.1 Administrative Support

All facilities are encouraged to contact the FRCP Development Team with questions about conducting facility inspections and maintaining records as well as suggesting appropriate BMPs and pollution prevention efforts.

### 4.2 Responsibilities and Organization

Continuous implementation of the FRCP relies on designated maintenance facility staff as well as Department Supervisors. *Table 2* outlines the specific expectations and responsibilities of each City employee involved with the FRCP continuous implementation process.

*Table 2: Staff Responsibilities for FRCP Continuous Implementation*

Department Supervisors	<ul style="list-style-type: none"><li>▶ Assist in problem resolution when requested by Main Site Contact(s)</li></ul>
Main Site Contact(s)	<ul style="list-style-type: none"><li>▶ Coordinate facility staff for training events and facility inspections</li><li>▶ Participate in training with FRCP Development Team</li><li>▶ Verify facility inspection reports and Corrective Actions are complete</li><li>▶ Contact the FRCP Development Team for assistance with troublesome Corrective Actions</li><li>▶ Participate in facility Audits with FRCP Development Team</li><li>▶ Maintain and up-date as needed the FRCP Binder/File</li></ul>
Facility Inspectors	<ul style="list-style-type: none"><li>▶ Conduct at least one (1) inspection every six (6) months</li><li>▶ Participate in education and training with FRCP Development Team</li><li>▶ Participate in facility Audits with FRCP Development Team</li><li>▶ Take immediate and scheduled actions when possible to reduce stormwater pollution risk</li></ul>

### 4.3 Decision Making Process

Continuous implementation of the FRCP Program is broken into four stages: Inspections and Evaluations, Corrective Actions, Recordkeeping, and Reporting. All stages must be conducted to support the annual compliance reporting effort and to reduce the risk of stormwater pollution from City maintenance facilities. The four stages are discussed in detail below.

#### 4.3.1 Inspections and Evaluations

Inspection forms are included in with the FRCP document. Each inspector is trained to identify potential problems and likely Corrective Actions using their FRCP document. The main facility contact will designate a time every six (6) months for at least one (1) qualified individual to walk the facility and complete an inspection. Inspections will be conducted quarterly. Frequency of inspections will be re-evaluated at the end of each year. At least once every five (5) years, the

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facility will undergo an Audit to determine the level of compliance and need for additional training. Section 4.4 describes FRCP Audits and **Attachment C** includes checklists for audits.

### **4.3.2 Corrective Actions**

Site inspectors will make the determination if an immediate Corrective Action can resolve a problem or if it must be scheduled through the main facility contact. In all cases, the recommended Corrective Actions should be completed before the next rain event or facility inspection, whichever is first. In the event that a recommended Corrective Action is insufficient or a similar problem continues to come about that could be solved through a structural management practice, the responsibility to take appropriate Corrective Action is sent up the chain of command and the Corrective Action form will reflect actions taken to resolve the problem. All reasonable and prudent efforts are expected in order to reduce the risk of stormwater pollution until a final Corrective Action is made.

### **4.3.3 Recordkeeping**

Each main contact at each facility reviews and verifies the completed inspection forms and Corrective Actions prior to filing the forms with the FRCP. Records are kept with the FRCP for at least five (5) years as a reference when a Facility Audit is completed. Each facility will be responsible for maintaining the records of all Audits and FRCP training and education.

### **4.3.4 Reporting**

The City's Public Works Department will summarize all FRCP Program activity for inclusion in the MS4 Annual Report. A narrative and numeric description of efforts will be completed for education and training, inspections and Corrective Actions as well as FRCP Audits. Information gathered from each facility will be used to summarize a city-wide perspective for FRCP Good Housekeeping and Pollution Prevention efforts.

## **4.4 Audits**

The FRCP supports the City of Bellevue stormwater management program. The FRCP document sets up facility Good Housekeeping/Pollution Prevention inspections to be conducted by Qualified Facility Inspectors quarterly at approximately 6-month intervals using the form provided in the FRCP. A FRCP Audit will be conducted every five (5) years at a minimum.

The audit checklists, included in **Attachment C**, have been developed to aid in assessing a facility's compliance with the requirements as they were expressed in the FRCP document. The primary outcome of an FRCP audit is the identification of opportunities to improve compliance with City of Bellevue Good Housekeeping/Pollution Prevention practices. Audits also allow the FRCP Development Team to look at the program's overall impact in terms of environmental protection and pollution prevention. The results of the audits will be used to address the FRCP program's progress in the MS4 Annual Report.

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### **4.4.1 Qualified Auditors**

An auditor shall be a qualified person familiar with the Facility Runoff Control Plan program and the goals thereof. The auditor must be familiar enough with the FRCP program to conduct an audit that will collect the data necessary to make a meaningful evaluation of the facility's compliance status and the effectiveness of the program in achieving its goals. The auditor must sign off on the Audit Checklist and distribute the completed checklist to the appropriate parties. If additional Auditors are needed, third party consultants may be used. The FRCP Development Team is responsible for selecting and training FRCP Auditors. To become a qualified auditor, the individuals would need to attend a FRCP inspection and become familiar with the FRCP program.

### **4.5 Education and Training**

Providing training opportunities and education materials relevant to maintenance facility staff is an ongoing consideration for the FRCP Development Team. A major goal of this program is to inform and educate maintenance facility staff about the personal actions recommended for managing pollutants of concern within individual facilities throughout the City. A brief summary is provided below and more detailed information regarding education and training is included in **Attachment E** of this document along with training logs.

#### **4.5.1 Basic Stormwater Awareness - Good Housekeeping/Pollution Prevention**

The FRCP Development Team provides a short, in-house education session for all maintenance facility staff at the time of the first FRCP facility visit, and annually with new staff. The session is intended to give the audience a general understanding of how good housekeeping and pollution prevention actions relate to protection of stormwater quality. The primary message for the audience is that each employee has a personal responsibility to protect water quality by staying alert and looking for potential pollution sources. The secondary message is that these efforts will help the City comply with the MS4 permit requirements.

#### **4.5.2 FRCP Inspector Training**

A focused education session is provided for all maintenance facility staff selected to be involved with implementing the site specific FRCP. This session is provided during the second site visit by the FRCP Development Team. The session uses the FRCP developed for that site as the learning materials. Learning objectives are accomplished through hands-on use of the FRCP documents. The primary message for the audience is that the FRCP is a living document that must be maintained in order to demonstrate compliance with the stormwater permit issued to the City. Each facility must maintain at least one (1) qualified site inspector at all times.

#### **4.5.3 On-going GH/PP and Stormwater Education**

The City's Public Works Department continually looks to identify and develop on-going Good Housekeeping/Pollution Prevention (GH/PP) and Stormwater education materials that also

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support the FRCP Program. On-going GH/PP and Stormwater education is provided in a number of ways including on-line training, safety meetings, posters/brochures, and conferences. Individualized GH/PP and Stormwater education topics are provided at each facility on an as needed basis.

**ATTACHMENT A**

**BELLEVUE FACILITIES MAP**



# City of Bellevue Facilities Map



Map #	Bellevue Property	Address
1	Street Department South Shop	206 Industrial Dr
2	Street Department North Shop	8285 Cedar Island Rd
3	Wastewater Maintenance Facility	8902 Cedar Island Rd
4	Street Department Southwest Shop	12805 S. 9th St
5	Fleet Maintenance Facility	2012 Betz Rd
6	Public Safety Building	1510 Wall St
7	Parks Department Office	8201 S. 42nd St
8	Cascio Pool	1500 Lawrence Ln
9	Dowding Pool	1500 Washington St
10	Gilbert Pool	503 W 29th Ave
11	Sun Valley Pool	5351 Arrow Rock Dr



**ATTACHMENT B**

**FACILITY PROFILE & QUESTIONNAIRE**

**HOT SPOT FORM**

Site Information	
Facility Name	
Inspection Date	
FRCP Inspector Name	
Facility Address	
Facility Supervisor	
Main Site Contact	
Other Contacts	

Activity	Never (0)	Occasionally (1)	Frequently (2)	Routinely/ Everyday (3)	Comments	Score
Maintenance & Repair						
Fueling (0, ≤10, 10-100, >100 gallons)						
Washing						
Storage						
Loading & Unloading						
Outdoor Material Storage						
Dumpsters/Trash Compactors						
Building & Ground Maintenance						
Parking Lot Maintenance						
Turf Management / Landscaping						

Rating System: Never = 0 or only rare occasion, Occasionally = 1-2/yr., Frequently = Approx. 1/mo., Routine = At least 1/wk.

**TOTAL SCORE FROM RIGHT COLUMN: \_\_\_\_\_**

Total Score Scale	Result	Action
>20	Hot Spot	FRCP required
10-20	Potential Hot Spot	Targeted Education & Policy (Consider FRCP)
<10	Not a Hot Spot	Targeted Education

**RESULT & ACTION FOR THIS FACILITY:**

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# Maintenance Facility Runoff Control Plan

## Facility Profile & Questionnaire

Please provide the following information:

General Information	
Maintenance Site Name	
Physical Street Address	
City, County, State, Zip	
Latitude & Longitude	° ' " N ° ' " W
Facility Supervisor	
Main Site Contact	
Main Site Contact's Phone Number	
Additional Site Contacts	

Site Activities	Circle
<b>Stationary Liquid Deicer Storage Tanks?</b> If yes, provide the tank quantity: _____ Secondary containment/protection? If yes, provide type of secondary containment/protection: _____	Yes or No Yes or No
<b>Solid Deicer Storage?</b> Covered? Bermed? List types of deicer: _____	Yes or No Yes or No Yes or No
<b>Vehicle Maintenance?</b>	Yes or No
<b>Vehicle/Equipment Washing?</b> Wash bay or outdoor washing: _____	Yes or No
<b>Outdoor Plow Storage?</b>	Yes or No
<b>Outdoor Stockpiles?</b> Describe the type of stockpile (sand, gravel, millings, mulch, asphalt cold patch, winter mix, construction debris, excavated soil): _____	Yes or No
<b>Vehicles &amp; Equipment Parked Outdoors?</b> If yes, list the vehicles/equipment (i.e. fuel vehicles, oil distributor, etc): _____	Yes or No
<b>Other Activities:</b>	

Solid Waste Activities		Circle		
<b>Hazardous Waste Generator Status*</b>		VSQG	SQG	LQG
<b>Do you reference the Waste Manual for waste disposal decisions?</b>		Yes	or	No
<b>Universal Wastes at Facility</b> (Title 40 of the Code of Federal Regulations (CFR) in part 273)	Batteries Lamps Mercury Containing Items Pesticides Aerosol Cans			
<b>Is there an outside storage area for hazardous materials or hazardous waste?</b>		Yes	or	No
<b>Is antifreeze stored on-site?</b>	Yes or No	If yes, what is it stored in? _____		
<b>How is used antifreeze managed?</b>	Recycled w/ outside company Reused on-site Sold			
<b>Has waste antifreeze been tested for hazardous vs. non-hazardous?</b>		Yes	or	No

\*VSQG = Very Small Quantity Generator, SQG = Small Quantity Generator, LQG = Large Quantity Generator  
<https://www.epa.gov/hwgenerators/categories-hazardous-waste-generators>

Grass & Weed Control Activities				
<b>Are pesticides stored on-site?</b> If yes, where? _____		Yes	or	No
<b>Are fertilizers stored on site?</b> If yes, where? _____		Yes	or	No
<b>Are personnel certified or educated on application methods?</b>		Yes	or	No

Solvent Usage and Storage		
<b>Are there any solvent parts washers used on-site?</b>		
<b>Chemical Name</b>	<b>CAS Number</b>	<b>Yearly Usage</b>
<b>Is any aqueous cleaning done?</b>		

Used Oil Activities	Circle
<b>Aboveground oil storage tanks (ASTs)</b>	Used Oil                      Gasoline Diesel                          Equip. Hydraulic Tank
<b>Any underground storage tanks (USTs)?</b>	Yes or No If yes, describe: _____
<b>Do you have a Spill Prevention, Control, &amp; Countermeasure (SPCC) Plan?</b>	Yes or No
<b>How is used oil disposed of?</b>	Describe (hazardous or nonhazardous, recycled):
<b>Do you burn used oil on-site?</b>	Yes or No If yes, what do you burn it in? _____

Geographic	
<b>Number of Acres at Facility:</b>	<b>Impervious Surface Estimate:          %</b>
<b>Are there wetlands on or near the facility?</b>	Yes or No          Type of Wetlands:
<b>Nearest Receiving Water (surface water body):</b>	Name:                                  Distance:
<b>Name of the watershed the property is located in:</b>	

Miscellaneous	Circle
<b>Are any wastes disposed of in underground injection wells, septic drainages, or on-site lagoon?</b>	Yes or No List type of wastes and where they are disposed: _____
<b>Are there any floor drains?</b> _____	Yes or No If yes, what do they empty into? _____
<b>Are there pits or sumps on-site?</b> _____	Yes or No Pits          Sumps          Other: _____
<b>Are there oil-water separators on-site?</b>	Yes or No If yes, how many? _____ Who maintains the separators & when? _____

**Miscellaneous Continued**

Is the site a Hot Spot, Potential Hot Spot, or Not a Hot Spot?

Are there any drinking water wells on the property?

Identify Property Neighbors:

North: \_\_\_\_\_

South: \_\_\_\_\_

East: \_\_\_\_\_

West: \_\_\_\_\_

**Process Flow**

Describe what happens when you transfer or receive new material: i.e. salt, sand, fuel

**Pollution Prevention/Good Housekeeping BMPs:**

Describe BMPs being implemented and how often:

**Addition Comments:**

**Attachments:**

Site Diagram(s) / Aerial Photograph, Hot Spot Evaluation Sheet, Site Photo Log

Prepared by: \_\_\_\_\_ Date: \_\_\_\_ / \_\_\_\_ / \_\_\_\_

**ATTACHMENT C**

**FRCP CHECKLISTS**

# Maintenance Facility Runoff Control Plan

## Inspection Checklist

SECTION I: Site Information	
Facility Name	
Inspection Date	
FRCP Inspector Name	
Facility Address	
Facility Supervisor	
Main Site Contact	
Other Contacts	

SECTION II: Inspection Records Review (*attach copies of all reviewed inspection records)	
1. Is facility inspection and records complete and thorough?	Y or N
2. General findings from Inspection Records Review:	
<ul style="list-style-type: none"> <li>•</li> </ul>	

SECTION III: General Facility Overview	
1. Have any major changes occurred to the facility since the last review?	
2. Have any structural BMPs been added to the facility?	
3. Have there been significant discharges of pollutants to the environment? If so, were any procedural changes made?	
4. What training has been conducted to teach Good Housekeeping/Pollution Prevention?	
5. Any revisions to the FRCP needed? (explain)	
<b>Walk Facility &amp; Note Any Significant Observations:</b>	
<ul style="list-style-type: none"> <li>•</li> </ul>	

**SECTION IV: Findings**

Overall, is the intent of the FRCP understood?	No	/	Somewhat	/	Yes
Are regular inspections being conducted?	No	/	Sometimes	/	Yes
Are inspection questions consistent with facility conditions?	No		/	Yes	
Are inspection boundaries correct?	No		/	Yes	
Are conditions at the facility consistent with inspection records?	No	/	Somewhat	/	Yes

**List changes that need to be made to the FRCP document or inspection form:**

- 

**List recommendations or corrective actions based on inspection:**

- 

**Section V: Overall Facility Grade (circle one)**

Needs Improvement                      Satisfactory                      Outstanding

FRCP Inspector: \_\_\_\_\_  
(Printed Name)

\_\_\_\_\_  
(Signature)

Facility Supervisor: \_\_\_\_\_  
(Printed Name)

\_\_\_\_\_  
(Signature)

## FRCP Site Visit Photo Checklist

Municipal Maintenance Facility: \_\_\_\_\_

Facility Address: \_\_\_\_\_

Photo Description	✓	Date
1. Front of Facility/Main Office		
2. Stormwater Drainages: Outfalls, drainage swales, ditches		
3. Paved Areas (including millings areas)		
4. Exposed Soil & Gravel		
5. Floor Drains, Trench Drains, Oil-water Separators		
6. Vehicle & Equipment Washing		
7. Parked Vehicle & Equipment Storage: Plows, Forklifts, Loaders, Vehicles		
8. Vehicle & Equipment Fueling		
9. Vehicle & Equipment Maintenance & Repair		
10. Stockpiled Materials: winter mix, sylvex, salt, mulch, millings		
11. Weed & Pest Management Chemicals		
12. Paints, Adhesives, Solvents		
13. Petroleum Oils & Fluids		
14. Aboveground Storage Tanks: Winter chemicals, fuel, oil, etc.		
15. Underground Storage Tanks		
16. Waste Materials: Trash bins, Waste drums		
17. Construction Salvage: Rubble, Fencing, Soil, Aggregate		
18. Recyclables: Scrap Metal, Used Batteries, Tires, Used Oil		
19. Mechanics Shop		

N/A = not applicable (no photo needed)

✓ = photo taken and included with program FRCP records (include date taken above)





**ATTACHMENT D**

**SUGGESTED BMP PRACTICES**

## **Building and Grounds Management**

The following are examples of potential pollution sources and/or potential pollutant conveyances:

- Stormwater Drainages- drain inlets, ditches, and outfalls
- Infiltration, Retention, and Detention BMP's Surfaced Areas Exposed Soil
- Gravel and Millings Floor Drains
- Trench Drains
- Oil-Water Separators

### Suggested Best Management Practices (BMP's)

a) Keep culverts, ditches, gutters, drain inlets, catch basins, and outfalls as well as infiltration, retention and detention areas free of target pollutants and in good condition.

b) Sweep surfaced areas to remove sediment and other materials that could be tracked or dispersed across the facility. Do not wash or spray materials into the storm drain system.

c) Inspect and identify areas of erosion, or offsite discharge of sediment or aggregate, that need preventative maintenance.

d) Keep floor drains, trench drains, and oil-water separators clear of build-up or debris to ensure proper drainage.

e) Keep emergency clean-up materials such as drain covers, absorbent booms, rags, or sandbags conveniently located near drain inlets, catch basins, and outfalls to stop pollutants from entering in the event of a spill.

f) Keep surfaced areas in good condition. Protect slopes, flat areas, exposed soil area, or transportation corridors with pavement if vegetation or aggregate are not an option or are inadequate solutions.

## **Vehicle and Equipment Management**

The following are examples of potential pollution sources:

- Vehicle and equipment
- Equipment washing
- Parked vehicle and equipment storage
- Equipment fueling
- Equipment maintenance and repair

### Suggested Best Management Practices (BMP's)

- a) Wash all equipment in designated areas (under cover with a pipe to a collection pit and then City sanitary sewer system)
- b) Minimize water usage during cleaning operations and use dry clean-up methods to remove sediments, clippings and other debris.
- c) Use biodegradable detergents if cleaning agents are necessary.
- d) Keep parts, equipment, and vehicles stored indoors or within designated outdoor areas away from storm drains, inlets, or catch basins.
- e) Inspect all connectors and liquid reservoirs on stored equipment and vehicles for leaks. Move leaking equipment and vehicles indoors or capture materials and dispose of properly.
- f) Immediately contain and clean up any spills or releases when they occur, and properly dispose of the cleaning materials.
- g) Cleanup evidence of fuel or oil residues on surfaces by grinning absorbent into the surface and sweeping up the material.
- h) Keep spill response kits and/or clean-up materials in close proximity to areas where spills or leaks are most likely to occur. Dispose of properly after use.
- i) Park vehicles and/or equipment close to the pump when refueling.
- j) Conduct all maintenance on vehicles and equipment indoors whenever possible.

## **Storage Tank Management**

The following are examples of potential pollution sources:

- Substances contained in storage tanks may include soil stabilizers, dust suppressants, herbicides, fertilizers, de-icing chemicals, fuels, lubricants and other petroleum products

### Suggested Best Management Practices (BMP's)

- a) Inspect tanks, pumps, pipes and valves for leaks and signs of corrosion.
- b) Keep valves or plugs on secondary containment closed at all times except when draining uncontaminated water.
- c) Make sure automatic shutoff valves are functioning properly.
- d) A Spill Prevention Control and Countermeasure (SPCC) plan in place to reduce the risk.

## **Waste Materials Management**

The following are examples of potential pollution sources:

- Waste Materials- trash, debris, empty product containers, rinse water, used oil filters.
- Fluids and Materials- gravel, sand, and soil.
- Recyclables- scrap metals, used batteries, tires, spent solvent, used oil

### Suggested Best Management Practices (BMP's)

- a) Cover and clearly label all waste receptacles according to waste type.
- b) Collect all litter that accumulates around the facility grounds and dispose in properly labeled containers.
- c) Ensure that trash bins are used and not overflowing by scheduling regular pickup and disposal of waste materials.
- d) Store containers, material, and salvage away from direct traffic routes, drain inlets, catch basins, outfalls, areas prone to flooding or ponding, and floor trench drains to prevent accidental damage or spills.
- e) Educate and train every employee that is their daily responsibility to be aware of materials, residues, and trash that could be washed away in Stormwater.
- f) Develop a plan to reuse or dispose of irregular waste material as soon as the material is brought on site.
- g) Store batteries in an upright position in leak proof covered containers.
- h) Schedule regular pick up for waste tires, scrap metal used oil, used antifreeze and other waste intended for recycling.
- i) If any waste material may be hazardous, complete a waste determination prior to disposal according to Departmental Procedures and keep records at the facility. Any material that poses a significant threat to human health and the environment, contact Hazardous Material Response. If unsure of disposal requirements, contact the Public Works Director for direction.
- j) Store hazardous waste containers (preferred in a building or covered area) on pallets or in a containment device to prevent corrosion of the containers by contact with moisture or other chemicals.
- k) Immediately contain and clean up any spills that may occur, and properly dispose of the cleaning materials.

## **Product Material Management**

The following are examples of potential pollution sources:

- Stockpiled materials - gravel, sand and soil, paints, fertilizers, and other chemicals and pesticides

### Suggested Best Management Practices (BMP's)

- a) Locate raw material stockpiles away from drain inlets, catch basins and outfalls.
- b) Sweep up loose product that is outside of designated area to prevent tracking.
- c) Reduce the exposure of stockpiles and limit the amount of stockpiled materials during the rainy season.
- d) To the extent possible, store materials indoors or cover piles with storm resistant coverings to prevent exposure to precipitation.
- e) Minimize the amount of pesticides and fertilizers that are stored on-site at all times.
- f) Store and dispose of pesticides and fertilizers per manufacturer's recommendations.
- g) Store materials in a dedicated area away from direct traffic routes to prevent accidental damage or spills and store materials indoors or under a covered area when possible.
- h) When receiving new product materials, check drums, tanks, and contents.
- i) Ensure all containers are clearly and accurately labeled according to contents.
- j) Close containers between filling and emptying events.
- k) Keep an adequate supply of dry absorbent material and dispose of properly once used



# Nebraska Department of Transportation Municipal Pollution Prevention

## Building & Grounds



- Keep culverts, gutters, and catch basins free of pollutants.
- Sweep paved areas to remove dirt, grit, grass clippings and other pollutants.
- Identify and repair off site erosion quickly to prevent impact to vegetation and drainage channels.

## Vehicles & Equipment



- Conduct maintenance or repairs away from drain inlets or catch basins.
- Clean up fuel & oil residues with absorbents, then sweep up material.
- Park vehicles & equipment close to pumps and don't top off tank when fueling.

## Product Materials



- Locate raw material stockpiles away from drain inlets and catch basins.
- Store materials in a dedicated area away from direct traffic routes to prevent damage or spills.
- Ensure all containers are properly labeled.

## Bulk Storage Containers



- Inspect tanks, pumps, pipes and valves for leaks and signs of corrosion.
- Keep valves or plugs on secondary containment closed at all times except when draining uncontaminated water.
- Make sure automatic shutoff valves are functioning properly.

## Waste Materials



- Cover and clearly label all waste receptacles according to waste type.
- Develop a plan to reuse or dispose of construction salvage as soon as material is brought on-site.
- Store batteries in upright position in leak-proof and covered containers.

For more information contact the NDOT at:  
**Phone:** 402-479-4656  
**Email:** [dor.operationsevenvironmental@nebraska.gov](mailto:dor.operationsevenvironmental@nebraska.gov)  
**Address:** 1500 Highway 2  
 PO Box 94759  
 Lincoln, NE 68509-4759  
**Website:** [dot.nebraska.gov/projects/environment](http://dot.nebraska.gov/projects/environment)



# MAINTENANCE FACILITY Good Housekeeping and Pollution Prevention

## What is Stormwater Runoff?

Stormwater runoff is precipitation (rain or melted snow) that flows over land. Stormwater can pick up pollutants as it runs off the land into lakes, streams and rivers. This is called polluted runoff.

Storm drains collect runoff and convey it without treatment directly into water bodies. Polluted runoff can impact drinking water, wildlife, human health, and property values.



## What are Common Stormwater Pollutants?



- **Soil, sand, sediments** cloud the water, smother and destroy critical wildlife habitat.
- **Chemicals** (fertilizer, paints and solvents, vehicle fluids, tar sealants, etc.) are carried with runoff and can be toxic to wildlife.
- **Salt**, which is spread on roads, sidewalks and parking lots to melt snow and ice, dissolves in water or snowmelt. Once it gets into our water it cannot be removed. Salt in water bodies can be toxic to aquatic life.
- **Solid waste & debris**, like cigarette butts, leaves, trash and other forms of litter is unsightly and can harm wildlife.

## Why is Stormwater Quality Important to NDOT?

Environmental Stewardship combines environmental considerations into the planning, design, construction and operational activities associated with the Nebraska transportation system. NDOT is committed to its role as an environmental steward and to preserving and protecting the environmental features and resources of the state.

Environmental permits are issued to NDOT for controlling many construction and operations activities which may impact water quality. NDOT works to communicate these requirements clearly, equipping Department staff to support compliance activities. In urban areas that have at least 10,000 people, additional stormwater control requirements are necessary to comply with EPA and NDEQ regulations. These permits are referred to as the National Pollutant Discharge Elimination System (NPDES) MS4 Permit.



## Good Housekeeping and Pollution Prevention at NDOT Facilities

Maintenance facilities operated by NDOT serve as a base for highway maintenance operations, providing many important services such as snow and ice control, highway and bridge maintenance, landscaping and mowing, fleet maintenance and repair, fueling operations, signal and lighting repair, sign maintenance, animal removal, and pickup of roadway litter and debris. NDOT is required to develop and implement an operation & maintenance program that includes a training component focused on preventing or reducing polluted runoff from NDOT operations.



## Good Housekeeping and Pollution Prevention Goals

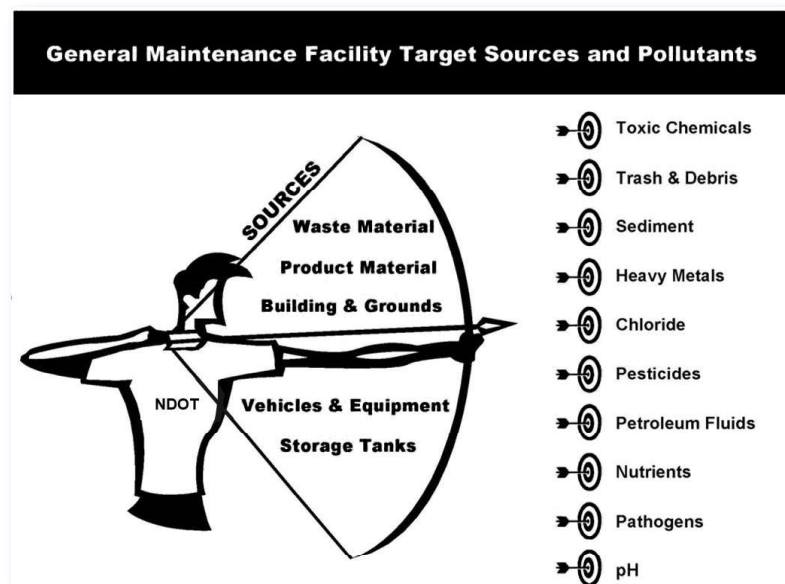


- **Reduce the risk** of discharging targeted pollutants into a storm drain system that may contaminate waters of the state from maintenance facilities
- **Inform and educate** maintenance facility staff about the personal actions recommended for managing targeted pollutants within individual facilities across the state.
- **Track** ongoing good housekeeping and pollution prevention efforts conducted at facilities in order to quantify effectiveness of stormwater protection.

- **Demonstrate compliance** with a program, including training, to reduce polluted runoff from maintenance facilities. This is required for all NDOT Operations conducted inside the urban boundary of a Nebraska community having more than 10,000 residents.
- **Maintain consistency** with existing environmental stewardship efforts and regulatory compliance obligations fulfilled at each facility.

## Target Pollutants and Source Categories

Every NDOT facility has unique conditions, but it is important to identify common target pollutants at a site. Understanding how to prevent and limit pollutant sources daily in facility activities such as vehicle & equipment management or product material storage leads to environmental stewardship.



### SOURCE CATEGORIES

Waste Material  
Product Material  
Building & Grounds  
Vehicles & Equipment  
Bulk Storage Tanks

## What is a Facility Runoff Control Plan?

If your facility lies within a MS4 Boundary, a Facility Runoff Control Plan (FRCP) will provide NDOT Maintenance Facility staff with a user-friendly, site-specific approach to protecting the quality of stormwater leaving a facility, using good housekeeping and pollution prevention Best Management Practices (BMPs). The FRCP is a living document, providing stormwater quality education, facility inspection and corrective action guidance for NDOT Maintenance Facility staff. However, the FRCP does not replace other facility environmental regulatory requirements (SPCC, RCRA, etc.).

## What is a Corrective Action?



Each facility with a FRCP is responsible for completing a self-inspection once a month. Qualified facility inspectors document potential and immediate pollutant issues requiring a corrective action, or the next action needed to repair, remove or remediate the pollutant and pollutant source before it can enter the storm drain system. Corrective actions should be completed before the next rain event or next facility inspection, whichever is first.

## Pollution Prevention is Everyone's Responsibility

Each person at a facility is responsible for protecting stormwater quality by making good housekeeping and pollution prevention Best Management Practices part of their daily routine. Always consider "L"evating your daily facility management by being mindful of **The Five "L"s** of Pollution Prevention.

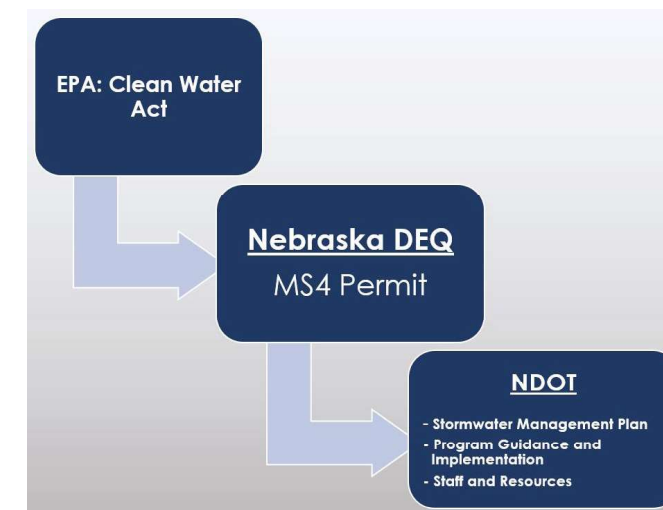
- Leaks:** Prevention Rapid Response
- Lids:** Overhead Cover Cap, Seal
- Labels:** Collection, Designated Areas Repurposed Containers
- Limits:** Use what you have first Reduce what is not necessary
- Locations:** Inside away from traffic Outside away from drainages

## Roadside Development and Compliance Unit (RDC)

NDOT's MS4 Program is implemented by the Environmental Division - Roadside Development and Compliance Unit.

RDC is responsible for making sure the following five required elements of the MS4 Program are being implemented for NDOT Construction and Operations.

1. Public Education, Outreach and Involvement
2. Illicit Discharge Detection and Elimination
3. Construction Stormwater
4. Post-Construction Stormwater
5. Good Housekeeping and Pollution Prevention





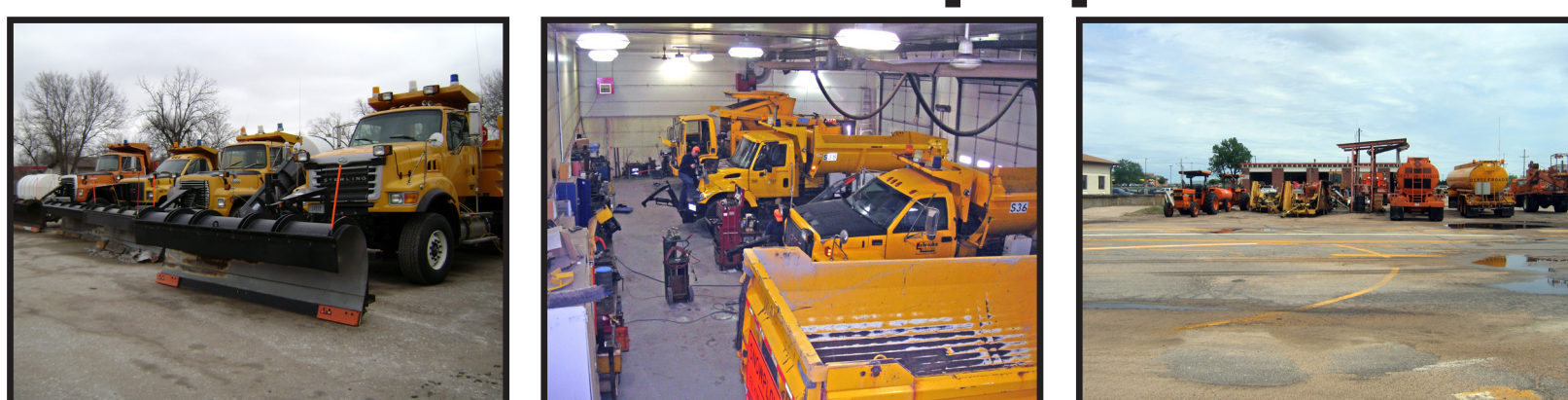
# Nebraska Department of Transportation Municipal Pollution Prevention

## Building & Grounds



- Keep culverts, gutters, and catch basins free of pollutants.
- Sweep paved areas to remove dirt, grit, grass clippings and other pollutants.
- Identify and repair off site erosion quickly to prevent impact to vegetation and drainage channels.

## Vehicles & Equipment



- Conduct maintenance or repairs away from drain inlets or catch basins.
- Clean up fuel & oil residues with absorbents, then sweep up material.
- Park vehicles & equipment close to pumps and don't top off tank when fueling.

## Product Materials



- Locate raw material stockpiles away from drain inlets and catch basins.
- Store materials in a dedicated area away from direct traffic routes to prevent damage or spills.
- Ensure all containers are properly labeled.

## Bulk Storage Containers



- Inspect tanks, pumps, pipes and valves for leaks and signs of corrosion.
- Keep valves or plugs on secondary containment closed at all times except when draining uncontaminated water.
- Make sure automatic shutoff valves are functioning properly.

## Waste Materials



- Cover and clearly label all waste receptacles according to waste type.
- Develop a plan to reuse or dispose of construction salvage as soon as material is brought on-site.
- Store batteries in upright position in leak-proof and covered containers.

For more information contact the NDOT at:

**NEBRASKA**

Good Life. Great Journey.

DEPARTMENT OF TRANSPORTATION

Phone: 402-479-4656  
Email: [dor.operationsenvironmental@nebraska.gov](mailto:dor.operationsenvironmental@nebraska.gov)  
Address: 1500 Highway 2  
PO Box 94759  
Lincoln, NE 68509-4759  
Website: [dot.nebraska.gov/projects/environment](http://dot.nebraska.gov/projects/environment)



**ATTACHMENT E**  
**EDUCATION & TRAINING**



TRAINING:

DATE OF TRAINING:

LOCATION/FORM OF TRAINING:

DESCRIPTION:

NAME	E-MAIL	DEPARTMENT	SIGNATURE
1			
2			
3			
4			
5			
6			
7			
8			
9			
10			
11			
12			
13			
14			
15			
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19			
20			

### Recommended Regular Trainings:

- Facility Good Housekeeping and Pollution Prevention (GHPP)
  - A training course to cover GHPP BMPs at the City's maintenance facilities.
  - Staff will be required to take a refresher course every 3 years and new hires will be required to take the course within the first 30 days of employment.
  - Recommended for Public Works Department, Fleet Maintenance Department, and Streets Department staff.
  - In-house Training.
- Implementation of Facility Runoff Control Plans (FRCP)
  - A training course related to the implementation and overview of the FRCP.
  - Staff will be required to take a refresher course every 3 years and new hires will be required to take the course within the first 6 months of employment.
  - Recommended for Public Works Department and FRCP Municipal Facilities staff.
  - In-house Training.
- Illicit Discharge Detection and Elimination (IDDE)
  - A training course related to illicit discharges.
  - Staff will be required take a refresher course every 3 years and new hires will be required to take the course within the first 30 days of employment.
  - Recommended for Public Works Department staff.
  - In-house Training.
- Erosion and Sediment Control training classes through City of Omaha's Annual Seminar or NDOT's Inspector Certification ([NE LTAP | Nebraska LTAP | Nebraska \(unl.edu\)](#)).
  - Classroom and Online Options

### Additional trainings and informational webinars:

#### EPA WEBINARS

##### **Post-Construction BMP Performance**

EPA Webinar

Dated 2/6/2008

Video Length 2 hours 5 minutes

Video Description: *Explores the details of best management practice (BMP) performance, including pollutant concentrations, volume reduction and total load reduction. It also debunks the BMP performance myth of using "percent removal" and highlights the Urban BMP Performance Tool, which includes hundreds of studies on BMP performance.*

Hyperlink to Website: [BMP Performance - YouTube](#)

##### **Road Salt Pollution**

EPA Stormwater Pollution Webinar

Dated 2006

Video Length 2 hours 11 minutes

Video Description: *Provides information on the impacts of road salt on the environment, implementation of TMLDs involving road salt, successful reduction strategies used by states, and possible groundwater impacts.*

Hyperlink to Website: [EPA's Stormwater Pollution Prevention Webinar Series: Road Salt Pollution Prevention Strategies - YouTube](#)

### **Building a Local Program & Municipal Operations**

EPA Webinar – “Killing Two Birds with One Stone”

Dated 12/6/2006

Video Length 2 hours 2 minutes

Video Description: *Includes an overview of maintenance activities, explains why maintenance is essential for water quality, and identifies top maintenance headaches faced by MS4s. It also discusses how to build an effective local maintenance program, conduct a municipal operations analysis, train municipal employees, reduce future maintenance burden by improving designs, track maintenance needs and activities, and ensure maintenance happens.*

Hyperlink to Website: [Building a Local Program to Maintain Your Stormwater Practices - YouTube](#)

### **Conducting IDDE Investigations**

EPA Stormwater Webinar

Dated 7/11/2007

Video Length 1 hour 58 minutes

Video Description: *Discusses the field and lab methods necessary to conduct IDDE investigations. The covered topics include: IDDE terminology, basic components of an effective IDDE program, desk top assessments of illicit discharge potential to prioritize field activities, outfall reconnaissance inventory, post-screening prioritization, and detailed field and lab analyses to confirm and identify illicit discharges.*

Hyperlink to Website: [Conducting Illicit Discharge Detection and Elimination Investigations \(IDDE 201\) - YouTube](#)

### **Finding & Fixing Illicit Discharges & Connections**

EPA Stormwater Webinar

Dated 9/30/2009

Video Length 2 hour 0 minutes

Video Description: *Focuses on finding and eliminating illicit discharges. The covered topics include: methods for tracing illicit discharges to their sources via various methods and eliminating illicit discharges. A specific case study is also discussed.*

Hyperlink to Website: [Illicit Discharge Detection and Elimination IDDE 301 - YouTube](#)

### **OSHA HAZWOPER Training Courses (Good Housekeeping)**

24-hour, 40-hour, and 8-hour trainings

Online OSHA classes available

HAZWOPER training applies to workers and employers involved in five specific types of operations outlined in OSHA's HAZWOPER standard:

- Required cleanup operations involving hazardous substances and conducted at an uncontrolled hazardous waste site
- Corrective actions involving cleanup operations at sites covered by the Resource Conservation and Recovery Act (RCRA)
- Hazardous waste operations conducted at treatment, storage and disposal (TSD) facilities regulated under RCRA
- Operations at non-TSD facilities that generate hazardous waste
- Emergency response operations involving the release of or substantial threat of release of hazardous substances regardless of the location of the hazards

### **Spill Prevention, Control, and Countermeasure (SPCC) Trainings (Good Housekeeping)**

### **Confined Space Entry Trainings for Sewer Maintenance (Good Housekeeping & IDDE)**



MUNICIPAL EMPLOYEE TRAINING STRATEGY  
GOOD HOUSEKEEPING & POLLUTION PREVENTION

Adapted from the City of Omaha Environmental Quality Control  
Division Plan



## Goal

The City of Bellevue recognizes the importance of having a broad base of educated and informed personnel in efforts to minimize stormwater pollution. With this, the City not only focuses on stormwater education to residents and the regulated community, but also coordinates education for applicable municipal employees, in an effort to achieve program goals through increased awareness. Training and education is to be focused on increasing comprehension and application of Good Housekeeping and Pollution Prevention (GH & PP) strategies that will protect the quality of stormwater runoff.

## Target Audiences

Training is provided to the employees who, through their routine activities, have the most potential to encounter stormwater pollution. These municipal employees can include:

- City maintenance facility staff and field crews
- City staff associated with Municipal Separate Storm Sewer System (MS4) maintenance activities

Municipal employees in other divisions and departments that may encounter potential sources of stormwater pollution in some form as part of their job duties will be made aware of training opportunities as they are provided, such as the annual Sediment & Erosion Control Seminar.

The primary message of the municipal staff training program is that each employee has a personal responsibility to protect water quality by making smart decisions, and to look for potential pollution sources, minimize sources, and address sources as applicable, as part of their standard operations.

## Training Resources

Trainings will be provided in a variety of forms, including but not limited to:

- EPA training webinars: Videos on a variety of GH & PP topics
- Presentations: tailored presentations to cover topics specific to audience
- Conferences and seminars: Events with tailored presentations, and often, applicable vendors for the subject matter and audience organized by the City, the Papillion Creek Watershed Partnership, or professional organizations
- Printed materials: brochures, posters, and field guides
- Web resources: Websites with electronic resources, including [OmahaStormwater.org](http://OmahaStormwater.org), and web-based educational programs and tools

## Training Topics

From year to year, various topics will be highlighted and prioritized to broaden the knowledge base of municipal staff. Topics to be covered include, but are not limited to:

- Illicit discharge detection and elimination



- Construction site runoff
- Good housekeeping measures and practices
- Post-construction Best Management Practices (BMPs)
- Spill prevention and countermeasures
- General pollution prevention
- Stormwater management

### Training Descriptions

- Training for City maintenance facility staff and field crews is provided in the Facility Runoff Control Plan (FRCP) Program document if one has been developed for their reporting location.
- Training specific to MS4 maintenance activities is available through conferences, online resources, and other platforms offered by professional organizations and agencies.
- Public Works staff receives initial training on GH & PP topics, including in-field training for inspection and maintenance activities, as well as ongoing trainings for continued education.

### Training Tracking

- Attendance and subject matter will be documented for each formal training coordinated and/or attended by Public Works and/or applicable staff.
- As part of their Facility Runoff Control Plans (FRCPs), maintenance facilities are to document their trainings. Site supervisors are encouraged to review and incorporate stormwater related topics into less formal educational settings, including staff meetings, safety meetings, and employee orientation.
- MS4 maintenance activity trainings are the responsibility of the respective department.

### Evaluation

Providing education opportunities and materials relevant to municipal staff is an ongoing consideration. The employee training strategy will be evaluated annually to determine appropriate topics and groups of staff that need further education or increased levels of awareness. Upon review each year, training format and content will be adjusted for applicability and greatest effectiveness. The City will continue to develop GH & PP educational materials as needs are recognized and/or staff feedback identifies a relevant topic that could reduce the risk of stormwater pollution.



# ILLICIT DISCHARGE DETECTION AND ELIMINATION (IDDE) TRAINING STRATEGY

Adapted from City of Omaha Environmental Quality Control Division,  
Public Works Department Plan



## Goal

Provide training for municipal field staff whose primary job duties lend them to potentially come in contact with or otherwise observe an illicit discharge or illicit connection to the separate storm sewer system.

## Target Audience

Municipal field staff originate from multiple City Departments. These can include:

- Parks, Recreation & Public Property
  - Park Maintenance
  - Code Enforcement
- Planning
  - Permits and Inspections
  - Community Development
- Public Works Department
  - Waste Water Department
  - Streets Department
  - Fleet Maintenance Department

## Strategy

Each respective Department's potential to encounter illicit discharges varies, some are more likely to see them than others. The Public Works Department serves as a primary resource for stormwater-related topics, including illicit discharge detection and elimination. Training and training resources will be provided to these Departments commensurate with their potential to come in contact with an illicit discharge. Ultimately, each Department oversees the training curriculum for their staff. The primary approach for training of municipal field staff will include, but is not limited to:

1. Compliance level training to eliminate confirmed illicit discharges or connections.
2. Inspector level training on illicit discharge detection.
3. Awareness level training for facility or department wide training sessions.
4. Provide printed educational materials.
5. Offer education and guidance on a case by case basis.

Most Departments will receive awareness level training. Within the Public Works Department identified personnel will receive Inspector and Compliance level training. City of Bellevue will encourage personnel to attend various internal and external training opportunities throughout the year. The training session topics include good housekeeping practices, erosion control installation and inspection, storm water pollution prevention measures, and other MS4 related trainings.

## Training Tracking

- Attendance and subject matter will be documented for each formal training coordinated and/or attended.
- As part of their Facility Runoff Control Plans (FRCPs), maintenance facilities are to document their trainings. Site supervisors are encouraged to review and incorporate stormwater related

topics, including IDDE, into less formal educational settings, including staff meetings, safety meetings, and employee orientation.

- Tracking for additional trainings are the responsibility of the respective Department.

### Reporting

The MS4 annual report will provide details of the training events and the number of employees in attendance, and the distribution of outreach materials.

### Evaluation

Providing education opportunities and materials relevant to municipal staff is an ongoing consideration. The City of Bellevue will continue to develop educational materials as needs are recognized and staff feedback identifies a relevant topic that could reduce the risk of stormwater pollution citywide.