



Section Six

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

Control Measure 6, Pollution Prevention/Good Housekeeping for Municipal Operations, requires the City to develop and implement a program to prevent or reduce pollution in stormwater from municipal operations. To comply with this minimum control measure, the City must "develop and implement an operation and maintenance program that includes a training component and has the ultimate goal of preventing or reducing stormwater from municipal operations."¹ The following steps are encouraged:

- Implement maintenance activities, maintenance schedules, and inspection procedures for all structural and non-structural stormwater controls to reduce floatables and other pollutants to the storm drain system
- Implement controls for reducing or eliminating the discharge of pollutants from streets, roads, highways, municipal parking lots, playing fields, maintenance and storage yards
- Adopt procedures for the proper disposal of waste removed from the storm drain system and from street sweeping.

BMPs in Haverhill's Stormwater Management plan designed to address Control Measure 6 include activities the City is already doing, such as street sweeping, catchbasin cleaning, and providing training for public employees. Additional BMPs have been added to round out the City's program, including implementing a program for cleaning pond inlets and trash racks. Together these BMPs will help minimize pollution from everyday municipal operations.

BMP #6-1: Continue Catchbasin Cleaning Program, Including Cleaning Priority Catchbasins (i.e. near ponds) Annually

Description: Haverhill's catchbasins are cleaned on a rotating schedule, with higher priority given to catchbasins near ponds or other environmental resources. The City dedicates one individual to cleaning catchbasins full time from April to November each year. Approximately 1000 catchbasins are cleaned each year. The City will continue this program. In addition, the City plans to modify the program to ensure catchbasins near environmentally sensitive areas are cleaned more often. In addition, the City plans to use its new GIS to maintain better records of when catchbasins were cleaned last and how full they were, to better schedule regular cleaning.

¹ United States Federal Register, Volume 64, No. 235, December 8, 1999 – Final Rule of the NPDES – Regulations for Revision of the Water Pollution Control Program Addressing Storm Water Discharges

Measurable Goal: Continue current program.

Schedule: Clean priority catchbasins annually. Base upon GIS and maintenance records.

Responsible person/department: Wastewater Department, Stormwater Coordinator.

Cost: No additional costs for existing program. Minimal time for review of existing program, record keeping, and prioritizing areas.

BMP #6-2: Street Sweeping

Description: The City currently sweeps streets full time from April through October (or as soon as possible after winter snowmelt). The City will continue this program. In addition, the City plans to modify the program to ensure streets near environmentally sensitive areas are swept more often as necessary.

Measurable Goal: Continue with current program.

Schedule: Continue with existing schedule.

Responsible person/department: Highway Department, Stormwater Coordinator.

Cost: No additional costs for existing program. Minimal time for review of existing program, record keeping, and prioritizing areas.

BMP #6-3: Adopt Appropriate Operating Procedures for Disposal of Catchbasin and Street Sweeping Residuals

Description: Street sweeping and catch basin residuals are currently contained near the Highway Depot. The City will review current operations and recommend improvements to ensure compliance with the Phase II regulations and implement any recommended changes to these standard operating procedures (SOPs) over the permit term.

Measurable Goal: Review current disposal procedures and modify as appropriate. Properly dispose of residuals.

Schedule: Review in year 1 of permit term. Implement throughout permit term.

Responsible person/department: Highway Department, Stormwater Coordinator.

Cost: No additional costs for existing program.

BMP #6-4: Minimize Salt Usage and Maintain Cover over Salt Storage Area

Description: Haverhill currently follows a Winter Maintenance and Snow Removal Policy, which is modeled on the state's recommendations. This includes minimizing the use of salt on streets, and keeping all salt storage areas covered. The City will continue to follow this policy. The City will also monitor industry standards and practices to continually evaluate new technologies that cost-effectively minimize deicer usage, and modify deicing practices as appropriate.

Measurable Goal: Continue program.

Schedule: Throughout permit term.

Responsible person/department: Highway Department, Stormwater Coordinator.

Cost: No additional costs for existing program.

BMP #6-5: Develop/Implement Program for Cleaning Pond Inlets and Trash Racks

Description: The City will develop a program to clean trash from pond inlets and trash racks. Such a program will help minimize trash reaching ponds and other water bodies. As a part of program development, the proper schedule for clearing the inlets and racks will be determined. For example, some racks may need to be cleaned monthly during the summer, while some may need to be cleaned only annually.

Measurable Goal: Develop a program to clean pond inlets and trash racks, including schedule.

Schedule: Schedule to be developed in 2004 and implemented as part of the 2005 catchbasin cleaning (BMP #6-1) and street sweeping (BMP #6-2) programs.

Responsible person/department: Stormwater Coordinator and Highway Department.

Cost: Staff time for development of schedule. Staff time included in BMP #6-1 and #6-2, above.

BMP #6-6: Develop/Implement Employee Education Program

Description: The City currently provides training for employees. This program will be expanded to include topics relevant to stormwater quality, such as looking for illicit connections, hazardous material handling and storage, equipment maintenance and repair, etc. The program will be implemented to all relevant public works employees and to new employees as appropriate.

Measurable Goal: Two hours of training during the permit period to all relevant employees on stormwater related topics for relevant public works employees.

Schedule: Two hours of training in each permit year starting in year 2.

Responsible person/department: Stormwater Coordinator and Highway Department

Cost: Staff time for program development and for training.