

Pollution Prevention/Good Housekeeping Minimum Control Measure



This fact sheet profiles the Pollution Prevention/Good Housekeeping for Municipal Operations minimum control measure, one of six program areas the operator of a Phase II regulated small municipal separate storm sewer system (MS4) is required to address as part of its National Pollutant Discharge Elimination System (NPDES) permit. This fact sheet offers general considerations on strategies used by MS4s to implement pollution prevention/good housekeeping programs. It is important to keep in mind that the small MS4 operator typically has flexibility in choosing exactly how to satisfy the pollution prevention/good housekeeping requirements in its NPDES permit.

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Why Is Pollution Prevention/Good Housekeeping Necessary?

The Pollution Prevention/Good Housekeeping for Municipal Operations minimum control measure requires small MS4 permits to include requirements for operators to examine and subsequently alter their own actions to help ensure a reduction in the amount and type of pollution that: (1) collects on streets, parking lots, open spaces, and storage and vehicle maintenance areas and is discharged into local waterways; and (2) results from actions such as environmentally damaging land development and flood management practices or poor maintenance of storm sewer systems.

While this measure is meant primarily to improve or protect receiving water quality by altering municipal or facility operations, it also can result in a cost savings for the small MS4 operator, since proper and timely maintenance of storm sewer systems can help avoid repair costs from damage caused by age and neglect.

What Is Required?

Recognizing the benefits of pollution prevention practices, the rule specifies that small MS4 permits must require regulated small MS4s to develop and implement an operation and maintenance program that:

- Has the ultimate goal of preventing or reducing pollutant runoff from municipal operations into the storm sewer system.
- Includes employee training on how to incorporate pollution prevention/good housekeeping techniques into municipal operations such as park and open space maintenance, fleet and building maintenance, new construction and land disturbances, and stormwater system maintenance. To minimize duplication of effort and conserve resources, the MS4 operator can use training materials that are available from EPA, their state or tribe, or relevant organizations.
- Determines the appropriate best management practices (BMPs) to meet permit requirements for this minimum control measure.

Some program implementation approaches and BMPs (i.e., the program actions/activities) are suggested below.

What Are Some Guidelines for Developing and Implementing This Measure?

The intent of this control measure is to ensure that existing municipal, state, or federal operations are performed in ways that will minimize contamination of stormwater discharges. Small MS4 operators are encouraged to consider the following types of components when developing their program for this measure:

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- ***Maintenance activities, maintenance schedules, and long-term inspection procedures*** for structural and non-structural controls to reduce floatables and other pollutants discharged from the separate storm sewers.
- ***Controls for reducing or eliminating the discharge of pollutants*** from areas such as roads and parking lots, maintenance and storage yards (including salt/sand storage and snow disposal areas), and waste transfer stations. These controls could include programs that promote recycling (to reduce litter), minimize pesticide use, and ensure the proper disposal of animal waste.
- ***Procedures for the proper disposal of waste*** removed from separate storm sewer systems and areas listed in the bullet above, including dredge spoil, accumulated sediments, floatables, and other debris.
- ***Ways to ensure that new flood management projects assess the impacts on water quality*** and examine existing projects for incorporation of additional water quality protection devices or practices. EPA encourages coordination with flood control managers for the purpose of identifying and addressing environmental impacts from such projects.

The effective performance of this control measure hinges on the proper maintenance of the BMPs used, particularly for the first two bullets above. For example, structural controls, such as grates on outfalls to capture floatables, typically need regular cleaning, while non-structural controls, such as training materials and recycling programs, need periodic updating.

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For Additional Information

Contacts

A list of contacts for the U.S. EPA's Office of Wastewater Management (Headquarters), each EPA regional office, and state office is located at:
<https://www.epa.gov/npdes/contact-us-stormwater>

Your NPDES Permitting Authority

Most states and territories are authorized to administer the NPDES Program, except the following, for which EPA is the permitting authority:

- American Samoa
- District of Columbia
- Guam
- Johnston Atoll
- Massachusetts
- Midway and Wake Islands
- New Hampshire
- New Mexico
- Northern Mariana Islands
- Puerto Rico
- Most Indian country lands

Reference Documents

- [EPA's Stormwater Website](#)
- [Stormwater Phase II Final Rule \(64 FR 68722\)](#)
- [Final MS4 General Permit Remand Rule \(81FR 89320\)](#)
- [Final Small MS4 Urbanized Area Clarification \(88 FR 37994\)](#)
- [Stormwater Phase II Rule Fact Sheet Series](#)
- [National Menu of Best Management Practices for Stormwater Phase II](#)
- [MS4 Permits – Compendium of Clear, Specific, and Measurable Permitting Examples](#)

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