



Town of Emmitsburg
Pollution Prevention Plan

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Introduction and Purpose

Polluted stormwater runoff has been identified by the United States Environmental Protection Agency (EPA) as one of the main causes of the nation's water quality problems. To help alleviate the situation, the EPA requires communities with Municipal Separate Storm Sewer Systems (MS4) to obtain a general permit under the National Pollutant Discharge Elimination System (NPDES) program authorizing their stormwater discharges.

Under the NPDES permit for its MS4, the Town of Emmitsburg is required to establish a regular inspection and maintenance program for all of its Town owned stormwater management facilities. All components of the stormwater collection system owned by the Town are included in this program. The components of the Town owned stormwater system include municipal roads, parking lots, or other paved areas; storm drain inlets, storm sewer piping and outfalls, swales, ditches, or other stormwater conveyances, detention/retention basins and other stormwater management structures.

The goal of this Pollution and Prevention Plan is to ensure that all of the Town of Emmitsburg's stormwater management facilities are functioning properly and to prevent or reduce pollutant runoff to the maximum extent practical. The Town of Emmitsburg personnel are required to follow this Pollution and Prevention Plan when operating, maintaining, or repairing any aspect of the Town's stormwater system. If outside contractors conduct work on any part of the Town's stormwater system, they will also be required to follow the procedures outlined in this manual.

Pollution Prevention/Good Housekeeping Procedures for Municipal Operations

Pollution prevention and good housekeeping are the simplest and least costly methods to implement to help protect stormwater quality from municipal facilities. These are integral components to an effective stormwater management policy because it is easier to prevent pollution from entering waterways than to clean it up later.

The Town uses the following Town owned facilities for municipal operations: 22 East Main Street, 140 South Seton Avenue, and 303 West Lincoln Ave. The Town pool is located at 201 West Lincoln Avenue.

Good Housekeeping

Good housekeeping practices are designed to maintain a clean and orderly work environment. Often the most effective first step towards preventing pollution in the stormwater collection system simply involves using good common sense to improve basic housekeeping methods. A clean and orderly work area reduces the possibility of accidental spills caused by mishandling of chemicals or equipment, and should reduce safety hazards to Town personnel.

- Maintain clean, dry floors and ground surfaces by using brooms, shovels, vacuum cleaners and cleaning machines.

- Sweeping shall be conducted once a week to get rid of dirt and other debris, as well as immediately following loading/unloading activities, when practical.
- Regularly pickup garbage and waste materials and place all trash, dirt, and other debris in the dumpster.

Material Storage Practices

Improper storage can result in the release of materials or chemicals that can cause stormwater runoff pollution. Keep storage areas clean and well organized and provide adequate aisle space to facilitate material transfer and easy access for inspections.

- All containers, drums, and bags shall be stored away from direct traffic routes to prevent accidental spills.
- When practical, chemicals, fluids, and supplies should be kept indoors.
- If containers containing chemicals are stored outside, they must be covered when not being used, and placed on spill platforms.
- All containers shall be kept in good condition, tightly closed when not in use, properly labeled and marked, and labels must remain clean and visible. Label all containers with contents and proper handling instructions.
- Perform regular inspections of all indoor and outdoor storage locations. Inspect outdoor storage areas after a defined rain event.
- Store bagged and boxed materials on pallets.
- Remove and properly dispose of expired materials.
- Do not place storage areas over or immediately adjacent to drains or waterways.
- Storage areas should be located on highly impervious surfaces such as concrete.
- Do not store incompatible materials with each other.
- Assure storage facility is constructed of proper materials and meets applicable fire and building codes.
- Equip storage areas with the appropriate spill clean-up materials.

Material Handling Practices

Absorbent material, spill kits and drip pans must be kept near any potential spill hazard and protected from rainfall. All 55 gallon drums are to be placed in a spill container. If spills or accidents occur, contain with dikes, berms, or appropriate absorbent materials and disposed of properly after use. Spills of hazardous materials require special care and should only be attempted by trained Town or contracted personnel. Notify the acting supervisor and emergency responders immediately if potentially harmful conditions exist. Collect all waste fluids in accurately labeled containers and dispose of properly.

Stormwater Facility Operation, Inspection, and Maintenance

Stormwater Facility Operation

All municipally owned stormwater facilities will be operated according to their design specifications and in a manner that prevents or reduces adverse environmental or public health and safety impacts.

Stormwater Facility Inspection

Regular inspections are to be conducted by the Town of Emmitsburg Public Works personnel to evaluate the performance of the stormwater facilities and to determine the potential or actual amounts of pollutants, trash, and debris entering and discharging from the stormwater collection system. These inspections should occur as part of regular job duties.

- Inspections will check for excessive silt build-up, erosion, cracked or collapsed pipes, misaligned joints, and water quality concerns such as unusual algae growth, discolored water, water with a sheen, and suspect odors.
- Inspection frequencies will depend on a variety of factors including weather conditions, type, and functions of stormwater structures.
- All inspection activities, results, and recommendations are to be documented in writing and kept on file with the Town. Typical records to be retained for reference include a log of all inspections, repairs, and maintenance performed at the site, copies of inspection reports, invoices for work performed, and photographs of facilities if practical.

Roadways

The Town of Emmitsburg owns and maintains approximately 12 miles of roadways.

- The overall condition and cleanliness of Town roads and parking lots shall constantly be inspected and evaluated during routine travels by Public Works' personnel.
- Those with excessive staining, trash, or sediment will be investigated and scheduled for cleaning or repairs as necessary.
- Appropriate corrective actions shall be considered for any areas exhibiting flooding or poor drainage patterns.

Storm Drain Inlets

The Town of Emmitsburg owns and maintains storm drain inlets located along Town owned roadways and parking lots throughout the Town.

- All of the Town's storm drain inlets are to be inspected on a regular basis to determine the trash and sediment load and overall condition of the structure. If the depth of deposits is greater than or equal to one-third the depth from the basin bottom to the invert of the lowest pipe or opening into or out of the basin, cleaning will be scheduled.
- Storm drain inlets that accumulate trash and deposits quickly will be inspected more frequently and the drainage area will also be inspected to determine possible causes.

- Inlet grates will be inspected to ensure that there is no trash blocking the inlets, especially before heavy rains are forecast.
- While inspecting storm drain inlets, Town staff will check for evidence of illegal dumping or illicit discharges. If evidence of illegal dumping or illicit discharges is found, efforts are to be made to identify the source of these discharges.

Storm Sewer Piping, Drainage Channels, and Outfalls

The Town owns underground storm sewer piping in a broad range of sizes.

- Large size piping is to be visually inspected on a regular basis to check for structural integrity, blockages, or any other unusual conditions such as improper cross-connections or excessive inflow/infiltration.
- Smaller size piping is to be inspected periodically or as needed with a TV camera.
- The Town also owns various storm culverts throughout the Town, which the Public Works personnel are to inspect for blockages, especially after rain events.

The Town maintains ditches and swales that function as storm drainage channels, and these are routinely checked for trash, debris, sediment build-up, obstructions, and general water quality.

- Storm drainage channels are to be inspected at least annually to check for obstructions or any other conditions that might impede the flow of stormwater.

Stormwater Basins

The Town owns and maintains stormwater basins located on Creamery Road and the Northgate residential development. These basins are to be inspected on a regular basis to check for sediment accumulation and overall basin conditions, and they should be inspected after large rain events to evaluate overall performance and drainage characteristics.

- Sediment exceeding 10% of the designed basin depth will trigger sediment removal to the original basin shape and depth.
- The basin will be inspected for the presence of trash, yard waste or other non-degradable materials.
- The type and quantity of vegetation will be checked.
- Basin dikes, berms, outlet structures, and spillways will be examined for structural integrity.
- The basins will be checked to determine if the trash racks are missing or plugged.
- The basins are to be checked for evidence of water pollution such as oil sheen, discolored water, and unusual odors.

Stormwater Facility Maintenance

The Town of Emmitsburg's stormwater Pollution Prevention Plan is structured to provide inspections of all facilities to provide maintenance as needed. Although the operable life of stormwater facilities is generally expected to be several decades or more, lack of maintenance resulting in overgrown vegetation, accumulated sediment and debris, and deteriorated structures

can greatly reduce their effectiveness. Without regular operation and maintenance programs, these facilities may not store or convey stormwater according to their design, and may require frequent repair or even replacement. Regular maintenance allows facilities to operate as designed for their maximum lifetime, enabling optimum flood control and water quality treatment as well as demonstrating to the public that stormwater capital investments are being protected in a systematic, responsible, and cost-effective manner.

- All maintenance activities are to be documented in writing and kept on file with the Town.

Roadways

The Town of Emmitsburg Public Works Department is responsible for repairs and maintenance of approximately 12 miles of Town roadways. In the winter months, the Public Works Department removes snow and ice from all of the Town roadways. Roadway maintenance activity that can affect stormwater quality include roadway paving repair, traffic line painting, snow removal, and de-icing, and street sweeping. If road paving or line painting is needed the work will generally be performed by outside contractors. If road repairs are needed, the work will generally be performed by the Public Works Department.

Roadway Paving Repair

The following guidelines should be followed when conducting roadway paving repairs within the Town of Emmitsburg:

- Avoid paving activities during wet weather.
- Ensure that storm drain inlets and open manholes are protected during road repair work to prevent slurry mixes, dust, and debris from entering the storm sewers.
- Avoid using water to clean up. Mechanically sweep and/or vacuum dust and debris following all activities. DO NOT wash residue into the storm drain system.
- Place stockpiles away from waterways and stormwater inlets to prevent materials from being washed into streams. Cover stockpiles or contain with berms.
- Contain water and wastes generated during cleaning and flushing of spray equipment and field servicing of equipment. Use booms and inlet protection, and vacuum or allow area to dry before uncovering storm drain inlets.
- Recycle used materials such as asphalt whenever possible. Store these materials properly.
- Use drip pans to contain leaks from vehicles and equipment parked at the site overnight.

Traffic Line Painting

The following guidelines should be followed when conducting traffic line painting activities within the Town of Emmitsburg:

- Develop paint-handling procedures for proper use, storage, and disposal of paints to keep materials contained.

- Protect storm drain inlets, open manholes and roadside ditches during grinding and pressure washing activities.
- Avoid using water to clean-up. Mechanically sweep and/or vacuum dust and debris following all activities. DO NOT wash residue into the storm drain system.
- Contain water and wastes generated during cleaning and flushing of spray equipment and field servicing of equipment. Use booms and inlet protection, and vacuum or allow area to dry before uncovering storm drain inlets.

Snow Removal and De-Icing

The storage and application of materials used for roadway de-icing or traction control shall be conducted in a manner that reduces the impact to the stormwater sewer system and the environment. Types of materials currently being used in the Town of Emmitsburg include rock salt for de-icing. All road salt is stored indoors in two salt sheds located at the Town's sewer plant. All salt storage is to be protected from precipitation.

- During loading and unloading of road salt, prevent and/or minimize spills by utilizing safe work practices and sound judgement.
- If any material is spilled, promptly collect it using dry cleaning methods only to prevent polluted runoff.
- At minimum, clean-up around the salt storage area should happen at least once a day.
- All collected material shall be either reused or properly disposed of in accordance with federal and state regulations.
- Minimize the tracking of materials from the storage area and the distance that road salt is transported during loading/unloading operations.
- All operators of snow plow/salt spreaders are to be trained in the proper application rates of road salt.
 - The salt spreaders are to be examined before operating to ensure that they are functioning properly.
 - The application of road salt to roads or parking lots will be only enough to accomplish the task and will take into consideration site specific characteristics such as road width and design, traffic concentration, and proximity to surface waters.
 - Road salt application should occur until snow has started to fall, to help ensure that the dry salt is not swept off the roadways by vehicles.

Street Sweeping

The streets in the Town of Emmitsburg are mechanically swept once per month. Periodically intersections or areas with built-up debris are swept by hand and debris are collected and disposed of accordingly. Any material recovered will be handled and disposed of in accordance with all applicable state and federal disposal regulations.

Storm Drain Inlets

The Town of Emmitsburg personnel shall schedule cleaning municipal storm drain inlets when inspections reveal an excessive accumulation of sediment or debris. Structural repairs to any

part of storm drain inlets will be performed as needed including replacement of damaged or deficient piping.

Storm Sewer Piping, Drainage Channels, and Outfalls

If inspection of storm sewer piping reveals structural deficiencies, cross-connections, or blockages from tree roots, sediment build-up or obstructions, then the appropriate maintenance solution will be selected and implemented. These solutions may include excavation and repair, tree root removal, and physical cleaning. Chemical agents will not be utilized. For cleaning techniques such as jet/vactor use, rodding or bucketing, the downstream end of the pipe will be blocked off and the debris will be captured and removed from the system. For storm culverts, maintenance of free flowing conditions will be achieved by physical removal of any blockages that are identified via inspections.

- For storm drain channels such as ditches or swales, debris, sediment and overgrown vegetation will be removed when needed.
- For storm sewer easements, the Town will remove any obstruction that is identified via inspection.
- For storm sewer outfalls, trash/obstructions will be removed to maintain free flowing conditions.
- Velocity reducers will be maintained or replaced as needed.

Stormwater Basins

When deemed necessary by inspections, removal of yard waste, non-degradable waste, nuisance or exotic/invasive vegetation and sediment in detention basins will occur during dry conditions when possible. In the process of effecting repairs or performing basin cleaning, vegetation may be disturbed or removed. These areas will be immediately stabilized and revegetated. Mowing and/or trimming of vegetation will occur as needed to sustain the basin and all detritus will be removed. Areas of bare or sparse vegetation will be addressed by soil aerating, conditioning, seeding and mulching, as necessary to restore a proper vegetative cover. Vegetative basin covers will be maintained at 95% at all times. Basin outlet structures will be cleared of debris when needed to allow for unimpeded flow.

Disposal of Debris

Any materials recovered from any part of the storm sewer collection system and street sweeping will be handled and disposed of in accordance with all applicable state and federal disposal regulations. All recovered materials, especially those from storm drain inlets, piping, or basins, will be evaluated to determine if it is municipal, residual, or hazardous waste.

- Most of the typical materials recovered by Town personnel will be municipal wastes that can be discarded with the Town's normal waste stream. This includes street sweepings, storm drain inlet cleanings, sewage contaminated soils, and general trash that is not obviously or knowingly contaminated. The following are guidelines for the proper disposal of materials recovered from municipal operations.

- Recovered trash and general debris will be brought back to the Town’s Public Works Facility yard where it can be discarded along with the normal Town municipal waste stream.
- Examples of residual wastes include oil-contaminated materials, asbestos piping, and used tires and oils. Asphalt millings are classified as a co-product if stored and managed properly; otherwise it is residual waste. Disposal of residual wastes will be subject to the requirements of the disposal facility. Chunks of cured asphalt are classified as clean fill and can be used as clean fill, but cannot be placed in the waterways (e.g. creeks, wetlands, or floodways). If used asphalt will not be used as clean fill, it must be disposed of as residual waste.
- If medical wastes are recovered, they are classified as “special handling municipal waste.” If Town personnel discover wastes that they believe to be hazardous or medical waste, they should immediately contact the Director of Public Works and inform him or her of the situation. The Director of Public Works is to contact the Fire Department and Haz-Mat team as appropriate for proper disposal of the waste.
- It ultimately will be up to the Town staff that are collecting or handling recovered materials to determine the proper waste designation and disposal methods. Any questions can be directed to the Solid Waste Program, Land, and Materials Administration through the Maryland Department of the Environment at 410-537-3315.

Fertilizers, Herbicides, and Pesticides

Any planned fertilizer applications on Town lands or around any part of the storm sewer collection system will be reviewed by Town personnel in order to comply with all applicable regulations and to prevent adverse water quality impacts.

- Fertilizers, herbicides, and pesticides shall be applied exactly according to manufacture guidelines. As more is not always better in the case of chemical application. The use of these chemicals will be limited as much as possible and non-hazardous alternatives shall be encouraged.
- Applications will only be conducted by Town staff or contractors who have an applicator’s license from the Maryland Department of Agriculture.