

Chapter 5

Source Control BMPs

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S-4	Illicit Discharge Controls
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1.0 Introduction

Proactively controlling pollutants at their source is fundamental to effective stormwater quality management and is part of the Four Step Process outlined in Chapter 1 of this manual. Typically, it is easier and more cost-effective to prevent stormwater pollution than to remove contaminants once they have entered the storm sewer system or receiving water. Local governments, industries, businesses and homeowners all have opportunities to implement source control practices that help prevent pollution. A good source control BMP is one that is effective at stopping and/or redirecting pollutants prior to entering the storm sewer system. A source control BMP can be a structural component of a planned site (e.g. a covered area for material storage) or a procedural BMP. The latter depend on behavior change accomplished through public education, training and development of standard operating procedures.

This chapter provides BMP Fact Sheets for common source control practices that can be integrated into overall stormwater management plans by local governments, industries and businesses. BMPs applicable to homeowners can also be used for integration into local government public education and awareness efforts related to stormwater quality.

Effective source control also requires awareness of discharges such as commercial washing of outdoor structures, which produces process wastewater that is not appropriate for discharge to the storm drain system. Table 5-1 summarizes types of pollutants generated at various types of facilities that may be reduced from implementation of the source controls found in this chapter. General guidance for selecting source control practices follows, along with the Source Control BMP Fact Sheets.

Table 5-1. Potential Pollutant Sources and Types with Applicable Source Control BMPs

Potential Pollutant Sources	Type of Facility				Pollutants Associated with Activity					Source Control BMP Fact Sheets
	Municipal	Industrial	Commercial	Residential	Sediment/ Litter/ Debris	Nutrients/ Organic Matter	Bacteria	Hydro- carbons	Toxics/ Chemicals/ Paint	
Outdoor Material Storage and Handling	x	x	x		x	x		x	x	Covering Outdoor Storage & Handling Areas Spill Prevention, Containment & Control Covering Outdoor Storage & Handling Areas
Heavy Equipment and Vehicle Maintenance/Storage Activities	x	x	x					x	x	Spill Prevention, Containment & Control Vehicle Maintenance, Fueling & Storage Vehicle Maintenance, Fueling & Storage Vehicle Maintenance, Fueling & Storage Street Sweeping
Parked Vehicles	x	x	x	x	x			x		
Vehicle Fueling	x	x	x					x		
Roads	x	x	x					x		
Deicing Chemicals/Snow Storage	x	x	x	x	x			x		Snow and Ice Management
Waste Storage/Disposal Practices	x	x	x	x	x			x	x	Good Housekeeping Illicit Discharge Control
Landscapes (e.g. fertilizers, herbicides, pesticides, excessive irrigation)	x	x	x	x	x			x	x	Landscaping Management Pesticide, Herbicide & Fertilizer Application & Handling
Storm Drain System (accumulated materials)	x				x			x	x	Storm Sewer System Cleaning
Pets				x				x		Good Housekeeping Illicit Discharge Control

2.0 Structural Source Controls

Site operations and potential pollution source control needs should be considered early in the planning and design process. This will reduce the load of pollutants into stormwater and may also facilitate site operations and reduce maintenance requirements for on-site treatment BMPs. Representative questions that should be considered prior to finalizing the site layout include:

1. What materials are stored on-site?
2. How are these materials handled and moved through the site?
3. What on-site operations take place that could potentially cause materials to enter the storm sewer system?
4. Where and how might these materials enter the storm sewer?
5. How can storage and handling areas and drainage facilities be designed to reduce pollutant loading? Is it feasible to cover these areas?
6. When a spill occurs, how and where will it be controlled and contained? Are structural spill containment measures needed? What is the relationship between these areas and planned treatment BMPs (Chapter 2) for the site?



Photograph 5-1. This commercial materials storage area drains directly to a storm drain. Effective site design would have located this storage area away from a storm drain and directed runoff to a landscape bed or provided additional covering and containment that would both protect the material and reduce pollutant loading to the storm sewer.

Use good judgment when planning your site and consider BMP Fact Sheets *S-1 Covering of Storage and Handling Areas* and *S-2 Spill Prevention, Containment and Control* early in the planning and design process. Structural source control measures must also be combined with appropriate employee training. For example, if a covered structure and spill containment area are constructed at an industrial site, but employees conduct operations subject to spills (e.g., drum storage) in other portions of the site, the structural BMP will not be effective.

3.0 Procedural Source Control BMPs

Procedural BMPs are actions or procedures that can be implemented to reduce pollutant loading. These practices are critical at stormwater "hotspots," but can also be effective when behavior change in residential areas occurs over entire watersheds. Examples of stormwater hotspots and the operations that cause pollution at hotspots are provided in the inset on the following page and in Table 5-2.

3.1 Municipal Operations

Communities regulated under Phase 1 or Phase 2 of the NPDES program are required to develop a program to:

- Prevent or reduce the amount of polluted stormwater generated by municipal operations;
- Educate employees to incorporate pollution prevention and good housekeeping practices into municipal operations; and
- Identify BMPs and measurable goals for the prevention or reduction of the amount of polluted stormwater that is generated by municipal operations.

Developing an effective municipal pollution prevention and good housekeeping program involves implementing a program that 1) is specifically designed for a community, taking into consideration how information is communicated and how training is provided and received, and 2) incorporates sound standard practices for various operations. Many communities nationally and in the metro Denver area have developed such standard operating procedures. The Fact Sheets provided in this chapter may be used to develop such procedures or to supplement existing procedures. Development of a program that is specifically tailored to a community should begin with evaluation of the following questions (Center for Watershed Protection 2008):

1. What municipal operations are conducted within the community?
2. What stormwater pollutants are associated with the operations?
3. Who is responsible for managing each of the operations?
4. What is the primary pollutant of concern in the subwatershed?
5. Which of the operations has the greatest influence on water quality and should be the focus of the community's pollution prevention/good housekeeping efforts?
6. What specific pollution prevention/good housekeeping practices should be implemented to improve the operations?
7. How much will the pollution prevention/good housekeeping practices cost?
8. Who will be responsible for implementing the pollution prevention/good housekeeping practices?
9. How will progress made in pollution prevention/good housekeeping be evaluated?

Examples of Stormwater "Hotspots"

- Fleet storage areas
- Solid waste facilities
- Wastewater treatment plants
- Composting facilities
- Nurseries and garden centers
- Restaurants
- Industrial rooftops
- Recycling facilities
- Maintenance facilities
- Gas stations
- Fast-food drive-thru areas
- Airports

Developing a Municipal Program

Urban Subwatershed Restoration Series Manual 9: Municipal Pollution Prevention/Good Housekeeping Practices prepared by The Center for Watershed Protection (2008), outlines a detailed approach for developing a municipal pollution prevention/good housekeeping program. The manual is available to download at no cost at www.cwp.org.

Table 5-2. Polluting Activities Associated With Common Hotspot Operations

(Source: Center for Watershed Protection 2005)

Polluting Activities Associated With Common Hotspot Operations	
Hotspot Operation	Polluting Activity
Vehicle Operations	<ul style="list-style-type: none"> ▪ Improper disposal of fluids down shop and storm drains ▪ Spilled fuel, leaks and drips from wrecked vehicles ▪ Hosing of outdoor work areas ▪ Wash water from cleaning ▪ Uncovered outdoor storage of liquids/oils/batteries spills ▪ Pollutant wash-off from parking lot
Outdoor Materials	<ul style="list-style-type: none"> ▪ Spills at loading areas ▪ Hosing/washing of loading areas into shop or storm drains ▪ Wash-off of uncovered bulk materials and liquids stored outside ▪ Leaks and spills
Waste Management	<ul style="list-style-type: none"> ▪ Spills and leaks of liquid ▪ Dumping into storm drains ▪ Leaking dumpsters ▪ Dumpster juice ▪ Wash-off of dumpster spillage
Physical Plant Maintenance	<ul style="list-style-type: none"> ▪ Discharges from power washing and steam cleaning ▪ Wash-off of fine particles from painting/sandblasting operations ▪ Rinse water and wash water discharges during cleanup ▪ Temporary outdoor storage ▪ Runoff from degreasing and re-surfacing
Turf and Landscaping	<ul style="list-style-type: none"> ▪ Non-target irrigation ▪ Runoff of nutrients and pesticides ▪ Deposition and subsequent wash-off of soil and organic matter on impervious surfaces ▪ Improper rinsing of fertilizer/pesticide applicators

3.2 Commercial and Industrial Operations

Commercial and industrial source controls focus primarily on reducing exposure of materials to rainfall and runoff and preventing non-stormwater discharges to storm sewers. Check federal and state requirements for obtaining and complying with stormwater discharge permits. The following BMP Fact Sheets are targeted to commercial and industrial operations:

- S-1 Covering Outdoor Storage & Handling Areas
- S-2 Spill Prevention Containment and Control
- S-5 Good Housekeeping

- S-6 Preventative Maintenance
- S-7 Vehicle Maintenance, Fueling & Storage
- S-10 Snow and Ice Management

Other fact sheets related to landscape management may also be helpful at commercial and industrial sites with landscaping.

3.3 Residential Activities

Although residential activities that may pollute stormwater runoff are typically conducted on a smaller scale than industrial, commercial and municipal operations, the cumulative impact of residential sources of pollution can be significant. As discussed in Section 3.1, municipal stormwater programs should include efforts to reduce pollution from residential areas within their jurisdiction. This is often accomplished through a combination of ordinances, public education efforts and incentives. BMP Fact Sheets provided in this chapter that are applicable to residential sources of pollution include:

- S-3 Disposal of Household Waste
- S-4 Illicit Discharge Controls
- S-5 Good Housekeeping
- S-8 Use of Pesticides, Herbicides and Fertilizers
- S-9 Landscape Maintenance
- S-10 Snow and Ice Management

4.0 Combining Source Control BMPs to Target Pollutants of Concern

In many cases, local governments will need to combine multiple source control practices and strategies to target control of specific pollutants. For impaired streams that have been assigned Total Maximum Daily Loads (TMDLs), municipal stormwater discharge permittees may receive a wasteload allocation, resulting in specific requirements to reduce pollutant loading in their stormwater permits. For example, bacteria is a leading cause of stream impairment nationally and in Colorado. Table 5-3 provides an example of a multi-faceted source control plan targeted toward reducing bacteria loading to streams. Similar combinations of source control practices can be targeted toward nutrients and other pollutants. To produce long-term behavioral change, a well-planned and executed public education campaign may be needed, combined with incentives and fines.

Table 5-3. Example Source Control Plan Targeting Bacteria
(Source: Colorado E. coli Work Group and WWE 2009)

Bacteria Source	Potential BMP/Management Strategy
Urban Areas	
Domestic Pets (dogs and cats)	Signage to pick up dog waste, providing pet waste bags and garbage cans. Enforcement of pet waste ordinances. Use of dog parks away from environmentally sensitive areas.
Urban Wildlife	Reduce food waste sources from commercial waste/grease spillage entering the storm drain.
Illicit Connections to Storm Sewers	Identification and removal of illicit sanitary and floor drain connections through municipal stormwater dry weather survey programs.
Leaking Sanitary Sewer Lines	"TVing" sanitary sewer lines to identify leaks or breaks that may cause seepage of untreated sanitary wastewater to streams or storm sewers.
Illegal Dumping	Enforcement, by municipal stormwater programs, related to illegal dumping.
Runoff from Urban Areas	Encouraging low impact development and development designs that minimize directly connected impervious areas, allowing stormwater to seep into the ground rather than run off into storm sewers. See Chapters 3 and 4.
Dry Weather Irrigation Flows	Dry weather flows from storm sewers can be reduced through better-controlled lawn/park irrigation practices.
Transient Populations	Support of city shelters and services to reduce homelessness.
Open Space	
Waterfowl Canadian Geese	Population controls (e.g., egg oiling, addling, dog harassment). See www.geesepeace.org for more information. Habitat modification is another potential BMP. Restoration of degraded riparian buffers.
Wildlife: Beavers, deer, raccoons, coyotes, mice	Consult with Colorado Division of Wildlife (CDOW); consider controls to make storm drains less desirable as animal homes; beaver trapping and relocation may be a consideration. Restoration of degraded riparian buffers.
Domestic Pets	See description above. In addition, strategic trail design incorporating vegetative buffers and grading away from the stream. Restoration of degraded riparian buffers.

5.0 References

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Description

When raw materials, byproducts, finished products, storage tanks, and other materials are stored or handled outdoors, stormwater runoff that comes in contact with the materials can become contaminated. Proactively covering storage and handling areas can be an effective source control for such areas. Coverings can be permanent or temporary and consist of tarp, plastic sheeting, roofing, enclosed structures, or other approaches that reduce exposure of materials to rainfall, runoff, and wind.



Photograph CS-1. Covered truck loading dock helps reduce exposure of materials to runoff.

Appropriate Uses

Covering is appropriate for areas where solids (e.g., gravel, salt, compost, building materials) or liquids (e.g., oil, gas, tar) are stored, prepared, or transferred. Consider covering the following areas:

- **Loading and Unloading:** Loading and unloading operations usually take place outside on docks, truck terminals, or outside storage or staging areas at industrial and commercial sites. Materials spilled, leaked, or lost during loading and unloading may collect in the soil or other surfaces and be carried away by runoff, or when the area is cleaned. In addition to spills to the ground surface, rainfall may wash pollutants off machinery used to unload and load materials. Materials may be spilled during transfer between storage facilities and truck or rail car during pumping of liquids, pneumatic transfer of dry chemicals, mechanical transfer using conveyor systems, or transfers of bags, boxes, drums, or other containers by forklift, trucks, or other material handling equipment.
- **Aboveground Tanks/Liquid Storage:** Accidental releases of chemicals from above-ground liquid storage tanks can contaminate stormwater with a variety of pollutants. Several common causes of accidental releases from above-ground tanks include: external corrosion and structural failure, problems due to improper installation, spills and overfills due to operator error, failure of piping systems, and leaks or spills during pumping of liquids or gases between trucks or rail cars to a storage facility.
- **Outside Manufacturing:** Common outside manufacturing activities may include parts assembly, rock grinding or crushing, metals painting or coating, grinding or sanding, degreasing, concrete manufacturing, parts cleaning or operations that use hazardous materials. These activities can result in dry deposition of dust, metal and wood shavings and liquid discharges of dripping or leaking fluids from equipment or processes and other residuals being washed away in storm runoff. In addition to the manufacturing process, outside storage of materials and waste products may occur in conjunction with outside manufacturing.
- **Waste Management:** Wastes spilled, leached, or lost from outdoor waste management areas or outside manufacturing activities may accumulate in soils or on other surfaces and be carried away by rainfall runoff. There is also the potential for liquid wastes from surface impoundments to overflow to surface waters or soak the soil where they can be picked up by runoff. Possible stormwater

S-1 **Covering Outdoor Storage and Handling Areas**

contaminants include toxic compounds, oil and grease, oxygen-demanding organics, paints and solvents, heavy metals and high levels of suspended solids. Lack of coverage of waste receptacles can result in rainwater seeping through the material and collecting contaminants or the material being blown around the site and into the stormwater collection system. Typical contaminant sources include: landfills, waste piles, wastewater and solid waste treatment and disposal, land application sites, dumpsters, or unlabeled drums.

- **Outside Storage of Materials:** Raw materials, intermediate products, byproducts, process residuals, finished products, containers, and materials storage areas can be sources of pollutants such as metals, oils and grease, sediment and other contaminants. Pollutant transport can occur when solid materials wash off or dissolve into water, or when spills or leaks occur.
- **Salt Storage:** Salt left exposed to rain or snow may migrate to the storm sewer or contaminate soils. Salt spilled or blown onto the ground during loading or unloading will dissolve in stormwater runoff. Stormwater contaminated with salt in high concentrations can be harmful to vegetation, aquatic life and groundwater quality. Typical contaminant sources include salt stored outside in piles or bags, salt loading and unloading areas, and salt/sand storage piles used for deicing operations.

Practice Guidelines

- Where practical, conduct operations indoors. Where impractical, select an appropriate temporary or permanent covering to reduce exposure of materials to rainfall and runoff.
- The type of covering selected depends on a variety of factors such as the type and size of activity being conducted and materials involved. Types of cover range from relatively inexpensive tarps and plastic sheeting to overhead structures or fully enclosed buildings equipped with ventilation, lighting, etc.
- Covering practices should be combined with Good Housekeeping BMPs to be most effective. Spill containment berms are also often needed at industrial sites.
- Measures such as tarps and plastic sheets typically require more frequent inspection and maintenance than constructed facilities.

Description

Spills and leaks of solid and liquid materials processed, handled or stored outdoors can be a significant source of stormwater pollutants. Spilled substances can reach receiving waters when runoff washes these materials from impervious surfaces or when spills directly enter the storm sewer system during dry weather conditions.

Effective spill control includes both spill prevention and spill response measures and depends on proper employee training for spill response measures and may also include structural spill containment, particularly at industrial locations. Structural spill containment measures typically include temporary or permanent curbs or berms that surround a potential spill site. Berms may be constructed of concrete, earthen material, metal, synthetic liners, or other material that will safely contain the spill. Spill control devices may also include valves, slide gates, or other devices that can control and contain spilled material before it reaches the storm sewer system or receiving waters.



Photograph SPCC-1. Use of secondary containment around supplies stored outside helps to reduce the likelihood of spill and leaks reaching the storm sewer system in runoff. Photo courtesy of Tom Gore.

Appropriate Uses

Implement spill prevention, containment and control measures at municipal, commercial and industrial facilities in areas where materials may be spilled in quantities that may adversely impact receiving waters when discharged directly or through the storm sewer system. Check local, state, and/or federal regulations to determine when spill containment and control measures are required by law. Spill Prevention, Control and Countermeasures Plans may be required for certain facilities handling oil and hazardous substances under Section 311(j)(1)(C) of the federal Clean Water Act.

Practice Guidelines

Spill Prevention Measures

- Train employees on potential sources of pollution on-site and provide clear, common-sense spill prevention practices. Require that these practices be strictly followed.
- Identify equipment that may be exposed to stormwater, pollutants that may be generated and possible sources of leaks or discharges.
- Perform regular inspection and preventative maintenance of equipment to ensure proper operation and to check for leaks or evidence of discharge (stains). Provide clear procedures to ensure that needed repairs are completed and provide temporary leak containment until such repairs can be implemented.

Also See These BMP Fact Sheets

- Covering Storage/Handling Areas
- Good Housekeeping
- Vehicle Fueling, Maintenance, Washing & Storage
- Preventative Maintenance

S-2 **Spill Prevention, Containment and Control**

- Drain or replace motor oil and other automotive fluids in a designated area away from storm sewer inlets. Collect spent fluids and recycle or dispose of properly. Never dispose of these fluids in the storm sewer or sanitary sewer.
- In fueling areas, clean up spills with dry methods (absorbents) and use damp cloths on gas pumps and damp mops on paved surfaces. Never use a hose to “wash down” a fuel spill.
- Where practical, reduce stormwater contact with equipment and materials by implementing indoor or covered storage, implementing stormwater run-on control measures and following good housekeeping practices.

Identification of Spill Areas

Identify potential spill areas, potential spill volumes, material types, frequency of material use, and drainage paths from spill areas with relation to storm sewer inlets, adjacent waterbodies, structural BMPs, and containment structures. Use this information to determine the types of spill prevention and control measures needed specific to the site conditions. Examples of potential spill locations include:

- Loading and unloading areas
- Outdoor storage areas
- Outdoor manufacturing or processing activities
- Waste disposal/storage areas
- Areas that generate significant dust or particulates (that may be subsequently deposited on the ground)
- Salt piles
- Areas prone to spills based on past experience at the site
- Locations where other routine maintenance activities occur such as equipment maintenance and cleaning, pesticide/fertilizer application, etc.

Additionally, areas where smaller leaks may occur such as parking should also have basic spill cleanup procedures.

Material Handling Procedures

From a water quality perspective, the primary principle behind effective material handling practices is to minimize exposure to stormwater. This can be accomplished by storing the material indoors under weather-resistant covering, elevating the material off the ground by using pallets, and diverting stormwater around materials storage areas. Representative outdoor materials handling procedures include:

- Keep bulk solid materials such as raw materials, sand, gravel, topsoil, compost, concrete, packing materials, metal products and other materials covered and protected from stormwater.
- When practical, store materials on impermeable surfaces.
- Store hazardous materials according to federal, state, and local hazardous materials requirements.

- Adopt procedures that reduce the chance of spills or leaks during filling or transfer of materials.
- Substitute less toxic or non-toxic materials for toxic materials.
- Store containers that are easily punctured or damaged away from high traffic areas (i.e., adopt a materials flow/plant layout plan).
- Add waste-capture containers such as collection pans for lubricating fluids.
- Store drums and containers with liquid materials on impermeable surfaces and provide secondary containment where appropriate. Drums stored outdoors should be located on pallets to minimize contact with runoff.

Spill Response Procedures and Equipment

Spill response procedures should be tailored to site-specific conditions and industry-specific regulatory requirements. General spill response procedures include:

- Containment and cleanup of spills should begin promptly after the spill is observed.
- Sweep up small quantities of dry chemical or solids to reduce exposure to runoff. Shoveling may be used for larger quantities of materials.
- Absorbents should be readily accessible in fueling areas or other areas susceptible to spills.
- Wipe up small spills with a shop rag, store shop rags in appropriate containers, dispose of rags properly or use a professional industrial cleaning service.
- Contain medium-sized spills with absorbents (e.g., kitty litter, sawdust) and use inflatable berms or absorbent “snakes” as temporary booms for the spill. Store and dispose of absorbents properly. Wet/dry vacuums may also be used, but not for volatile fluids.
- Develop procedures and locations for containing and storing leaking containers.
- Install drip pans below minor equipment leaks and properly dispose of collected material until a repair can be made.
- For large spills, first contain the spill and plug storm drain inlets where the liquid may migrate off-site, then clean up the spill.
- Excavation of spill areas to removed contaminated material may be required where large liquid spills occur on unpaved surfaces.
- An inventory of cleanup materials should be maintained onsite and strategically located based on the types and quantities of chemicals present.

Structural Spill Containment Measures

Two general approaches are often used when implementing spill containment measures. The first approach is designed to contain the entire spill. The second approach uses curbing to route spilled material to a collection basin. Both containment berming and curbing should be sized to safely contain or convey to a collection basin a spill from the largest storage tank, rail car, tank truck, or other containment device in the possible spill area. The spill containment area must have an impermeable surface (e.g.,

S-2 Spill Prevention, Containment and Control

impermeable liner, asphalt or concrete) to prevent groundwater contamination. The containment system must be designed to enable collection and removal of spilled material through a pump or vacuum trucks, use of sorbent or gelling material, or other measures. Material removed from the spill area must be disposed of or recycled according to local, state, and federal standards.

If the capacity of the containment berming or the collection basin is exceeded, supplemental spill control measures should be available such as a portable containment device, sorbent materials, or gelling agents that eventually solidify the material. Water that collects within containment areas due to rainfall or snowmelt must be appropriately treated before release from the spill area.

Spill Plan Development

Many industries are required by federal law to have a Spill Prevention, Control and Countermeasures Plan (SPCC) that meets specific regulatory criteria when certain types and quantities of materials are used or processed at a site. These plans can be instrumental in developing a spill control plan for stormwater management purposes. Even if an SPCC plan is not legally required at a site, a spill control plan for stormwater management purposes may be necessary. Representative information appropriate for a spill control plan, building on concepts previously introduced in this Fact Sheet, includes:

- Site plan showing where materials are stored and handled, and where associated activities occur.
- Notification procedures to be used in the event of an accident
- Instructions for clean-up procedures.
- A designated person with spill response and clean-up authority.
- Training of key personnel in plan and clean-up procedures.
- Signs posted at critical locations providing a summary of SPCC plan information, phone numbers, contacts, equipment locations, etc.
- Provisions requiring spills to be cleaned up, corrective actions taken, or countermeasures implemented immediately.
- Provisions for absorbents to be made available for use in fuel areas, and for containers to be available for used absorbents.
- Prohibition on washing absorbents into the storm drainage system or into the sanitary sewer system via floor drains.
- Provision for emergency spill containment and clean-up kits in accessible and convenient locations. Kits should contain the appropriate clean-up materials applicable to the materials stored at the site.

Key Spill Notification Contacts in Colorado

- Colorado Department of Public Health and Environment Toll-Free 24-hour Environmental Emergency Spill Reporting Line: 1-877-518-5608
- National Response Center: 1-800-424-8802 (24-hour)
- Local Emergency Planning Committee (OEM): 303-273-162
- Division of Oil & Public Safety-Storage Tanks: 303-318-8547
- Oil and Gas Conservation Commission: 303-894-2100 or 1-888-235-1101 (toll-free spill/complaint line)

Description

Improperly disposed household wastes are a source of stormwater pollution. These wastes can include household chemicals, pet waste, yard waste, litter, automotive maintenance waste, and others. These materials can be transported in stormwater when the materials are dumped directly into the storm drains or when they are spilled on impervious surfaces and washed into the storm sewer system. Household wastes can contribute solids, nutrients, oxygen demanding substances, toxic substances, and bacteria to receiving waters. Improper disposal of household wastes on the ground surface can also lead to groundwater contamination.

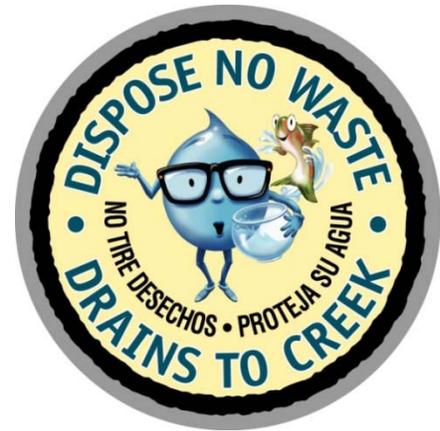
Proper disposal of household waste is dependent on behavioral change, which can be encouraged through public education programs and local ordinances that prohibit improper disposal of household waste. Additionally, local governments can provide appropriate facilities for proper disposal of waste.

This Fact Sheet focuses primarily on household waste. See the Good Housekeeping Fact Sheet for additional information on waste management at commercial and industrial sites.

Appropriate Uses

Educational efforts related to proper disposal of household waste can be targeted to homeowners and businesses through municipal programs, civic groups, and others. Local governments should consider measures needed in the following general categories:

- **Household/Commercial Waste:** Household waste includes materials discarded on the land surface or into the stormwater system from residential and commercial areas. Wastes from commercial businesses are generated by stores, restaurants, hotels, offices, and other non-manufacturing activities. Household waste disposal objectives include containing and properly disposing of refuse (garbage), reducing litter, and encouraging proper household toxic waste disposal through public education and access to appropriate disposal facilities.
- **Litter:** Most litter is biodegradable and can create an oxygen demand in water as it decomposes. Examples of litter are paper products, used diapers, etc. Research by Keep America Beautiful, Inc. (1990) has shown that people litter where litter has already accumulated. Also according to Keep America Beautiful, Inc. (1987), pedestrians and motorists account for less than 25 percent of litter, with the other sources being household waste, commercial and industrial waste, haulage vehicles, loading docks, and construction sites. Reduction of litter through proper disposal can reduce its accumulation on the urban landscape and its eventual entry into the stormwater system.
- **Pet Waste:** Pet waste deposited on the ground can be transported by the storm drainage system to receiving waters or by overland flow into waterways. Fecal matter potentially contains pathogenic viruses and bacteria; it also creates an oxygen demand in water. The majority of improperly disposed pet waste occurs in public areas, such as streets and parks. Pet waste ordinances are common in municipalities; however, these are difficult to enforce, especially with limited municipal resources. Education can help bring this problem to the public's attention, and can thereby reduce deposition of pet waste on urban surfaces.



Photograph DHW-1. Placing storm drain markers (or stenciling) at storm sewer inlets is a public education tool that can be used to educate citizens and discourage improper disposal of household waste in storm drains. Photo courtesy of Nonpoint Source Colorado.

- **Yard Waste:** Yard waste includes limbs, leaves and grass clippings that can contribute nutrients, lawn chemicals, and oxygen demand to receiving waters when washed into storm sewers and waterways. Public education efforts on the benefits of composting and on proper disposal of yard waste can help to reduce the volume of yard waste entering the stormwater system and receiving waters. Most yard waste can be reused following composting, with the exception of weeds and diseased plant materials.
- **Used Oil and Automotive Fluids:** Used oil and automotive fluids including antifreeze, brake fluid, transmission fluid, grease, other lubricants, and petroleum-based cleaning solvents are wastes generated during automobile maintenance by residential households and commercial businesses. These can enter the storm drainage system if poured directly into storm inlets or from residual on concrete or asphalt exposed to precipitation. Improper disposal of used oil and automotive fluids causes receiving waters to become contaminated with hydrocarbons and residual metals that can be toxic to stream organisms. Used oil and other petroleum products can be recycled and are accepted by many auto parts stores and repair shops. Public education on the location of these centers, the benefits of recycling, prevention of fluid leaks, and the importance of proper disposal for improving stormwater quality can reduce the amounts of oil and used automotive fluids reaching receiving waters.
- **Toxic Wastes:** Toxic wastes are generated in small quantities by residential households and commercial businesses. Examples include paint, solvents, putties, cleaners, waxes, polishes, oil products, aerosols, acids, caustics, pesticides, herbicides, and certain medicines or cosmetics. These products and their containers should always be disposed of in accordance with the product label or recycled, if appropriate. When such toxic substances are improperly disposed of by dumping on impervious surfaces or into street gutters or storm inlets, stormwater can transport these materials to receiving waters.

Composting

Composting is a natural method for recycling organics such as yard trimmings and food scraps, which comprise nearly a quarter of municipal solids waste generated (Keep America Beautiful 2010). Nearly half of all U.S. states now ban yard waste from landfills because it represents such a large volume that can be productively composted. Composted yard waste used as mulch or soil amendment can provide landscape water conservation benefits, reduce the burden on landfills and is protective of water quality.

Municipal Recycling Programs

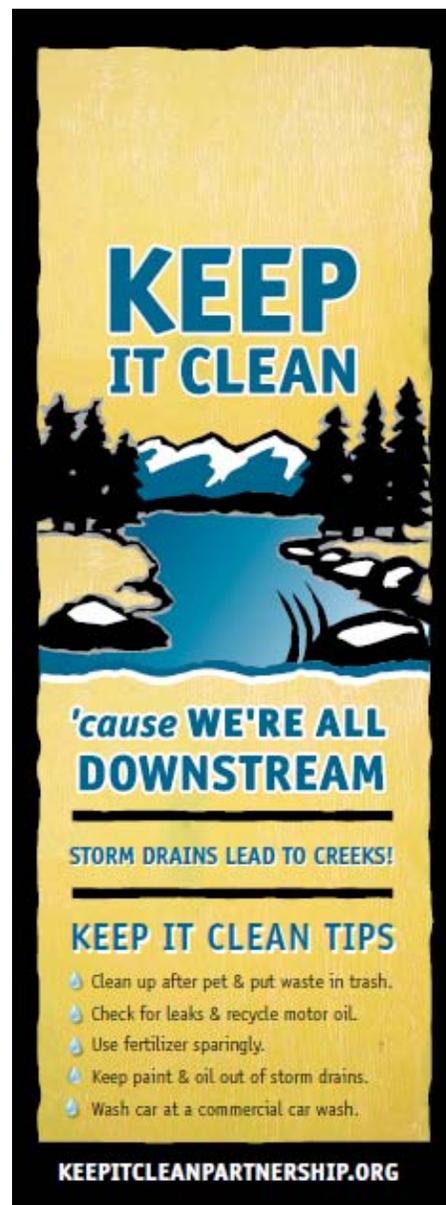
Many communities throughout the country have implemented municipal recycling programs, rather than relying on citizens to research and seek out recycling opportunities on their own. Curbside recycling programs and municipal education campaigns can improve the success of recycling programs. For more information on implementing a municipal recycling program, visit a variety of U.S. Environmental Protection Agency websites such as: <http://www.epa.gov/epawaste/conserv/rrr/index.htm> and <http://www.epa.gov/region4/waste/rcra/mgtoolkit/index.html> or review well developed local programs such as Denver Recycles.

Practice Guidelines

To reduce improper disposal of household waste, implement public education efforts regarding how improper disposal of wastes can degrade the quality of streams, rivers, lakes, and wetlands. Local governments have many public education options that can be tailored to fit local needs and budget constraints the best. Within local governments, opportunities for coordinated efforts among multiple departments may be beneficial. For example, properly composting of yard waste can provide a stormwater benefit when these materials are kept out of the gutter, as well as a water conservation benefit when the materials are reused as mulch and a solid waste management benefit when these materials are kept out of landfills. Similarly, public works and parks and recreation departments both benefit from efforts related to pet waste disposal signage as well as disposal facilities in parks.

Representative public education strategies may include:

- Development, publication, and distribution of brochures.
- Utility bill inserts, flyers, and handbills.
- Newspaper articles and/or advertisements.
- Development and distribution of educational videos.
- Public workshops, field demonstrations, or presentations to targeted civic organizations, youth organizations, etc.
- Developing and offering school curricula or assembly programs.
- Creating posters, signs, and graphics for installation at parks, school hallways, trails, etc.
- Storm drain stenciling to discourage dumping of materials into storm drains.
- Signs, including graphics, on dumpsters and other locations encouraging proper waste disposal.
- Signs in parks and along streets on pet waste control and ordinances.
- Brochures and utility bill inserts on separation of wastes and recycling.
- Advertising the locations of existing toxic disposal sites and waste recycling centers.
- Advertising the locations of existing automobile fluids and used oil disposal sites.



Photograph DHW-2. Check with state and local water quality agencies for public education materials such as this door hanger developed by the Keep It Clean Partnership that can be adopted for use in your community. Photo courtesy of Nonpoint Source Colorado.

- Developing campaigns promoting voluntary neighborhood clean-up efforts.
- Advertisements or notices of private locations accepting yard waste for composting.
- Information on backyard or neighborhood composting and proper disposal of yard waste.

In addition to public education efforts, local governments can provide facilities that provide readily available proper disposal opportunities. These practices include:

- Establishing and maintaining household toxics disposal sites.
- Annual or curbside collection of household toxics.
- Pet waste disposal bags in public parks.
- Providing waste containers in problem litter areas.
- Requiring waste-haulage truck covers.
- Seasonal or on-going collection programs for grass clippings, tree branches, and leaves with disposal at composting or chipping facilities, paired with distribution programs for reuse of composted or chipped materials.

With regard to household toxics, local governments should be aware that collection and disposal of household wastes is expensive. Such programs require adequate training of operators, analysis of unknown materials, safe transport and containers, extensive recordkeeping and awareness of regulatory requirements (e.g., the federal Resource Conservation and Recovery Act) regarding disposal of such materials.

Description

Illicit discharges are non-stormwater discharges into a storm drain system, with some limited exceptions specified in state and local discharge permits (e.g., fire fighting water, springs, and others). Examples of illicit discharges include illegal dumping (e.g., used oil), accidental spills, failing septic systems, improper disposal of sewage from recreational activities such as boating or camping, and improper plumbing of sanitary discharges from residences and commercial or industrial establishments into the storm sewer system. A common cause of illicit discharges is connection of building or garage or floor drains to the storm sewer system.



Photograph IDC-1. Mapping and dry weather investigation of storm sewer outfalls is an important tool in identifying and removing illicit connections. Photo courtesy of WWE.

Control of illicit discharges involves a multi-faceted effort based on knowledge of the storm sewer system, use of ordinances to prohibit illicit discharges, development of a coordinated plan to detect and address illicit discharges, and a public education program to increase awareness of the problems caused by illicit discharges.

Appropriate Uses

Illicit discharge control measures are usually implemented by municipal governments and metropolitan districts, but may also be relevant to campus-scale developments or industries. Illicit discharge controls are closely related to practices identified in the Good Housekeeping BMP Fact Sheet.

Practice Guidelines

Practice guidelines for illicit discharge controls are discussed in three general categories:

1. Public education to reduce illegal dumping and discharges,
2. Municipal actions to identify and remove illegal connections to the storm sewer system, and
3. Accidental spill response measures.

Public Education to Reduce Illegal Dumping and Discharges

Public education and awareness are the foundation for reducing illegal dumping and some types of illicit discharges. For example, many citizens may not be aware that storm sewers drain to streams rather than wastewater treatment plants or may not be aware of the environmental damage caused by discharging soapy water, pet waste and other household wastes into the storm sewer system. Local governments should select public awareness and education approaches most effective for their communities, which may include a combination of some of these practices:

- Enactment of clearly written ordinances prohibiting illegal dumping and illicit connections. Many local governments already have such ordinances; however, citizens are often unaware of these. Publicity including news articles, door hangers, utility bill inserts, radio or TV advertisements, website highlights and other measures can be used to increase awareness. Such efforts may be particularly effective when connected to a specific water quality problem such as stream or lake impairments due to bacteria and/or nutrients.
- Storm drain stenciling involves placing a marker or using a stencil to paint a message on storm drains to discourage dumping down the storm drain. These messages are a public education tool so that citizens are aware that the materials that they dump down to the storm drain are discharged to a stream, as opposed to a wastewater treatment plant.
- Provide citizens with readily available contact information to report illegal dumping. Install a "hotline" telephone number to handle calls from citizens reporting illegal dumping or accidental spills.
- Create brochures and other guidance for businesses related to illegal discharges to the storm drain. Educational efforts should not only alert business owners that non-stormwater discharges are not allowed, but also provide guidance on BMPs to implement. For example, power washing discharges are process wastewater that may not be discharged to the storm sewer system. When power washing is conducted, storm drain inlet protection, wet vacuuming, collection systems, and/or other appropriate measures to prevent washwater from entering the storm drain system should be implemented.

Illicit Connections

Eliminating illicit connections plumbed into the storm drain system involves two different components:

1. Identifying and removing existing illicit connections; and
2. Preventing new illicit connections.

Removing Existing Connections

Existing illicit connections of sanitary sewers to the storm drainage system in existing developments can be identified by a systematic dry weather inspection of storm sewer outfalls following readily available illicit discharge detection and elimination guidance available from EPA. Initial screening typically involves mapping all storm sewer outfalls and conducting field inspections to identify suspect outfalls based on odor, sewage-related residue (e.g., toilet paper), discoloration, dry weather flows, etc. Grab samples of dry-weather discharges can be collected at suspect locations and analyzed for targeted water quality constituents (e.g., E. coli, temperature, pH, surfactants). Where illicit connections are probable, more advanced techniques can be used to isolate the likely source of the connection. Techniques such as temperature probes (to track diurnal temperature changes indicative of shower use suggesting a sanitary connection to a storm sewer), optical brightener screening (indicator of detergents), zinc chloride smoke testing, fluorometric dye testing, television camera inspections and other approaches can be used as follow-up measures. Once the illicit connection has been identified, the plumbing can be corrected and proper connections to the sanitary sewer system implemented.

Preventing Illicit Connections

Program elements to prevent illicit connections include:

- Ensure that existing building and plumbing codes prohibit physical connections of non-stormwater discharges to the storm drain system.
- Have a program in place to review and approve any proposed connection into a storm sewer.
- Require visual inspection of new developments or redevelopments during the construction phase to ensure that proper plumbing connections are implemented. Train field inspectors and develop field inspection procedures that prevent new illicit connections of sanitary sewer lines to storm sewers.

Accidental Spill Response

Although the storage, transport and disposal of hazardous and toxic substances is a highly regulated activity under state and federal laws, accidents will inevitably occur, resulting in potential release of chemicals and wastes into the storm sewer system. Most local police, fire, or other departments are trained and equipped to respond to such spills. Local governments should work with response personnel to ensure current mapping of storm drains and BMPs and review training procedures for spill response and cleanup. Proper training combined with readily available knowledge of the storm sewer system and appropriate spill control materials can result in more effective protection and blocking of the drainage system during spill response.

Additional Illicit Discharge Detection and Elimination Guidance

The Center for Watershed Protection and Robert Pitt (2004) prepared *Illicit Discharge Detection and Elimination: A Guidance Manual for Program Development and Technical Assessments* under EPA funding to provide guidance to communities in developing effective management programs and field guidance to reduce illicit discharges. This manual provides detailed guidance and field forms that can be used to identify illicit connections.

Description

Good housekeeping practices are designed to maintain a clean and orderly work environment. The most effective first steps towards preventing pollution in stormwater from work sites simply involve using common sense to improve the facility's basic housekeeping methods. Poor housekeeping practices result in increased waste and potential for stormwater contamination.

A clean and orderly work site reduces the possibility of accidental spills caused by mishandling of chemicals and equipment and should reduce safety hazards to personnel. A well-maintained material and chemical storage area will reduce the possibility of stormwater mixing with pollutants.



Photograph GH-1. Use dry clean-up methods to remove spilled materials. Photo courtesy of Colorado Nonpoint Source Program.

Some simple procedures a facility can use to promote good housekeeping include improved operation and maintenance of machinery and processes, material storage practices, material inventory controls, routine and regular clean-up schedules, maintaining well organized work areas, signage, and educational programs for employees and the general public about all of these practices.

Appropriate Uses

Good housekeeping practices require education and training, typically targeted to industries and businesses, municipal employees, as well as the general public.

Practice Guidelines

Good housekeeping practices include these general areas:

- Operation and Maintenance
- Material Storage
- Material Inventory
- Training and Participation.

Operation and Maintenance

Consider implementing the following practices:

- Maintain dry and clean floors and ground surfaces by using brooms, shovels, vacuums or cleaning machines, rather than wet clean-up methods.
- Regularly collect and dispose of garbage and waste material.

- Routinely inspect equipment to ensure that it is functioning properly without leaking and conduct preventative maintenance and needed repairs.
- Train employees on proper clean up and spill response procedures.
- Designate separate areas of the site for auto parking, vehicle refueling and routine maintenance.
- Promptly clean up leaks, drips and other spills.
- Cover and maintain dumpsters and waste receptacles. Add additional dumpsters or increase frequency of waste collection if overflowing conditions reoccur.
- Where outdoor painting and sanding occur, implement these practices:
 - Conduct these activities in designated areas that provide adequate protection to prevent overspray and uncontrolled emissions. All operations should be conducted on paved surfaces to facilitate cleanup.
 - Use portable containment as necessary for outside operations.
 - Clean up and properly dispose of excess paint, paint chips, protective coatings, grit waste, etc.
- Maintain vegetation on facility grounds in a manner that minimizes erosion. Follow the Landscape Maintenance and Pesticide, Herbicide and Fertilizer Usage BMPs to ensure that minimum amounts of chemicals needed for healthy vegetation are applied in a manner that minimizes transport of these materials in runoff.

Material Storage Practices

Proper storage techniques include the following:

- Provide adequate aisle space to facilitate material transfer and ease of access for inspection.
- Store containers, drums, and bags away from direct traffic routes to reduce container damage resulting in accidental spills.
- Stack containers according to manufacturer's instructions to avoid damaging the containers from improper weight distribution. Also store materials in accordance with directions in Material Safety Data Sheets (MSDSs).
- Store containers on pallets or similar devices to prevent corrosion of containers that results from containers coming in contact with moisture on the ground.
- Store toxic or hazardous liquids within curbed areas or secondary containers.

Material Inventory Practices

An up-to-date materials inventory can keep material costs down by preventing overstocking, track how materials are stored and handled onsite, and identify which materials and activities pose the most risk to the environment. Assign responsibility of hazardous material inventory to individuals trained to handle such materials. A material inventory should include these steps:

- Identify all chemical substances present at work site. Perform a walk-through of the site, review

purchase orders, list all chemical substances used and obtain Material Safety Data Sheets (MSDS) for all chemicals.

- Label all containers. Labels should provide name and type of substance, stock number, expiration date, health hazards, handling suggestions, and first aid information. Much of this information can be found on an MSDS.
- Clearly identify special handling, storage, use and disposal considerations for hazardous materials on the material inventory.
- Institute a shelf-life program to improve material tracking and inventory that can reduce the amount of materials that are overstocked and ensure proper disposal of expired materials. Careful tracking of materials ordered can result in more efficient materials use. Decisions on the amounts of hazardous materials that are stored on site should include an evaluation of any emergency control systems that are in place. All storage areas for hazardous materials should be designed to contain spills.

Training and Participation

Frequent and proper training in good housekeeping techniques reduces the likelihood that chemicals or equipment will be mishandled. To promote good housekeeping, consider implementing these practices:

- Discuss good housekeeping practices in training programs and meetings.
- Publicize pollution prevention concepts through posters or signs.
- Post bulletin boards with updated good housekeeping procedures, tips and reminders.

Description

Preventative maintenance involves proactive routine inspection and testing of plant equipment and operational systems to prevent leaks and spills. A preventative maintenance program should also include inspections of conveyance channels, storm sewers, inlets, catch basins, stormwater detention areas, and other water quality treatment systems associated with the site.



Photograph PM-1. Preventative maintenance can reduce the frequency and occurrence of leaked or spilled material that can be transported in stormwater runoff.

Appropriate Uses

This BMP is applicable to municipal, industrial and commercial sites.

Preventative maintenance programs typically incorporate practices identified in the Good Housekeeping, Materials Storage and Handling, Vehicle Fueling, Maintenance and Storage, and other source control BMPs. See the Structural BMP Maintenance chapter for preventative maintenance for stormwater BMPs.

Practice Guidelines

Elements of a good preventative maintenance program should include:

- Identification of equipment or systems, which may malfunction and cause spills, leaks, or other situations that could lead to contamination of stormwater runoff. Typical equipment to inspect includes pipes, pumps, storage tanks and bins, pressure vessels, pressure release valves, process and material handling equipment.
- Once equipment and areas to be inspected have been identified at the facility, establish schedules and procedures for routine inspections and scheduling repairs.
- Periodic testing of plant equipment for structural soundness is a key element in a preventative maintenance program.
- Promptly repair or replace defective equipment found during inspection and testing.
- Keep spare parts for equipment that needs frequent repair.
- Replace worn parts prior to failure.
- Implement, maintain and regularly review a record keeping system for scheduling tests and documenting inspections in the preventative maintenance program. Be sure to follow inspections promptly with completion of needed repairs. Clearly record the problem and the specific actions taken to correct the problem. Photos can be helpful components of such records. An annual review of these records should be conducted to evaluate the overall effectiveness of the preventative maintenance program. Refinements to the preventative maintenance procedures and tasking should be implemented as necessary.

Description

Areas where vehicles are fueled, maintained, and stored/parked can be pollutant "hot spots" that can result in hydrocarbons, trace metals, and other pollutants being transported in stormwater runoff. Proper fueling operations, storage of automotive fluids and effective spill cleanup procedures can help reduce contamination of stormwater runoff from vehicle maintenance and fueling facilities.

Fuel-related spills can occur due to inattention during fueling or "topping off" fuel tanks. Common activities at commercial, industrial and municipal maintenance shops include parts cleaning, vehicle fluid replacement, and equipment replacement and repair. Some of the wastes generated at automobile maintenance facilities include solvents (degreasers, paint thinners, etc.), antifreeze, brake fluid and brake pad dust, battery acid, motor oil, fuel, and lubricating grease. Fleet storage areas and customer and employee parking can also be a source of vehicle-related contamination from leaks, antifreeze spills, etc.



Photograph VF-1. Use drip pans to collect leaks from vehicles until repairs can be completed. Photo courtesy of Tom Gore.

Appropriate Uses

These BMP guidelines are applicable to vehicle maintenance, fueling, fleet storage and parking facilities. Be aware that washing vehicles and equipment outdoors or in areas where wash water flows onto the ground can pollute stormwater. Vehicle wash water is considered process wastewater that should not be discharged to the storm sewer system. Consult state and federal discharge permit requirements for proper disposal of vehicle washwater, which is typically accomplished through discharge to the sanitary sewer system.

Practice Guidelines¹

Vehicle Maintenance

The most effective way to minimize wastes generated by automotive maintenance activities is to prevent their production in the first place. Consider adopting these practices:

- Perform maintenance activities inside or under cover. When repairs cannot be performed indoors, be sure to use drip pans or absorbents.
- Keep equipment clean and free of excessive oil and grease buildup.

¹ Guidelines adapted from the USEPA Menu of BMPs.

- Promptly cleanup spills using dry methods and properly dispose of waste. When water is required, use as little as possible to clean spills, leaks, and drips.
- Use a solvent collection service to collect spent solvent used for parts cleaning. Where practical, use detergent-based, steam cleaning, or pressure-based cleaning systems instead of organic solvent degreasers when practical. (Be aware that cleaning water discharged into the sanitary sewer may require pre-treatment prior to discharge.)
- When using liquids for cleaning, use a centralized station to ensure that solvents and residues stay in one area. Locate drip pans and draining boards to direct solvents back into a solvent sink or holding tank for reuse.
- Store used oil for recycling in labeled tanks. Locate used oil tanks and drums away from storm drains, flowing streams, and preferably indoors.
- Use non-hazardous or less hazardous alternatives when practical. For example, replace chlorinated organic solvents with non-chlorinated ones like kerosene or mineral spirits.
- Properly recycle or dispose of grease, oil, antifreeze, brake fluid, cleaning solutions, hydraulic fluid, batteries, transmission fluid, worn parts, filters, and rags.
- Drain and crush oil filters before recycling or disposal.
- Drain all fluids and remove batteries from salvage vehicles and equipment.
- Closely monitor parked vehicles for leaks and place pans under any leaks to collect the fluids for proper disposal or recycling.
- Install berms or other measures to contain spills and prevent work surface runoff from entering storm drains.
- Develop and follow a spill prevention plan. This includes a variety of measures such as spill kits and knowing where storm drains are located and how to protect them (e.g., drain mat, berm) when larger spills occur. (See the Spill Prevention, Containment and Control BMP for more information.)
- Conduct periodic employee training to reinforce proper disposal practices.
- Promptly transfer used fluids to recycling drums or hazardous waste containers.
- Store cracked batteries in leak-proof secondary containers.
- Inspect outdoor storage areas regularly for drips, spills and improperly stored materials (unlabeled containers, auto parts that might contain grease or fluids, etc.). This is particularly important for parking areas for vehicles awaiting repair.
- Structural stormwater BMPs in vehicle hotspot areas require routine cleanout of oil and grease, sometimes monthly or more frequently. During periods of heavy rainfall, cleanout is required more often to ensure that pollutants are not washed through the trap. Sediment removal is also required on a regular basis to keep the BMP working efficiently.

Vehicle Fueling

- Designated fueling areas should be designed to prevent stormwater runoff and spills. For example, fuel-dispensing areas should be paved with concrete or an equivalent impervious surface, with an adequate slope to prevent ponding, and separated from the rest of the site by a grade break or berm that prevents run-on of stormwater.
- Fuel dispensing areas should be covered. The cover's minimum dimensions must be equal to or greater than the area within the grade break or the fuel dispensing area so that the fueling area is completely covered. It may be necessary to install and maintain an oil capture device in catch basins that have the potential to receive runoff from the fueling area.
- For facilities where equipment is being fueled with a mobile fuel truck, establish a designated fueling area. Place temporary "caps" over nearby catch basins or manhole covers so that if a spill occurs, it is prevented from entering the storm drain. A form of secondary containment should be used when transferring fuel from the tank truck to the fuel tank. Storm drains in the vicinity should also be covered. Install vapor recovery nozzles to help control drips, as well as reduce air pollution.
- Keep spill response information and spill cleanup materials onsite and readily available.
- Fuel-dispensing areas should be inspected regularly and repair promptly completed. Inspectors should:
 - Check for external corrosion and structural failure in aboveground tanks.
 - Check for spills and overfills due to operator error.
 - Check for failure of any piping systems.
 - Check for leaks or spills during pumping of liquids or gases from a truck or rail car to a storage facility or vice versa.
 - Visually inspect new tank or container installations for loose fittings, poor welds, and improper or poorly fitted gaskets.
 - Inspect tank foundations, connections, coatings, tank walls, and piping systems. Look for corrosion, leaks, cracks, scratches, and other physical damage that may weaken the tank or container system.
- Aboveground and belowground tanks should be tested periodically for integrity by a qualified professional.
- Dry cleanup methods should be employed when cleaning up fuel-dispensing areas. Such methods include sweeping to remove litter and debris and using rags and absorbents for leaks and spills. Water should not be used to wash these areas. During routine cleaning, use a damp cloth on the pumps and a damp mop on the pavement, rather than spraying with a hose. Fuel dispensing nozzles should be fitted with "hold-open latches" (automatic shutoff) except where prohibited by local fire departments. Signs can be posted at the fuel dispenser or island warning vehicle owners/operators against "topping off" vehicle fuel tanks.
- Written procedures that describe these BMPs should be provided to employees who will be using fueling systems.

Description

Pesticides, herbicides, fertilizers, fuel and other landscape maintenance chemicals must be properly applied, stored, handled and disposed of to prevent contamination of surface water and groundwater. Misuse of pesticides and herbicides can result in adverse impacts to aquatic life, even at low concentrations. Misuse of fertilizer can result in increased algae growth in waterbodies due to excessive phosphorus and nitrogen loading.



Photograph PHF-1. Pesticide, fertilizer, and herbicide applications should be applied in the minimum quantities necessary to achieve specific landscaping objectives, while keeping chemicals out of storm drain systems. Photo courtesy of WWE.

Appropriate Uses

This BMP applies to both commercial and municipal landscaping operations, as well as to homeowners and homeowner associations. For commercial operations, the scale of chemical usage and handling is greater; therefore, additional measures are often required under federal and state law.

Practice Guidelines¹

Public education regarding appropriate landscape chemical application and handling is an important action that local governments can take to reduce the likelihood that landscape chemicals are washed into storm drains and receiving waters through runoff. Local governments can make landscape care information available on websites, in utility mailers, lawn care centers, and other locations. A variety of professional organizations for lawn care professionals already exist and can be contacted for additional information or partnered with for both public education and landscape professional educational efforts and certification programs (See www.ext.colostate.edu and www.greenco.org).

General Guidelines for Pesticide, Herbicide, and Fertilizer Application

- Apply fertilizers, pesticides, and other chemicals according to manufacturer's directions. The label is the law for pesticide usage. Apply pesticides and herbicides only when needed and use in a manner to minimize off-target effects. See the Landscape Management Fact Sheet for fertilizer application guidelines.
- Accurately diagnose the pest. Disease and insect symptoms can mimic each other in many plants. A fungicide will not control an insect, and an insecticide will not control a disease.
- Be aware that commercial chemical applicators must receive thorough training, licensure and proper certification prior to chemical use. Consult Colorado Department of Agriculture (CDA) Regulations for specific requirements.

¹ These practice guidelines have been adapted from the *GreenCO Best Management Practices for the Conservation and Protection of Water Quality in Colorado: Moving Toward Sustainability* (GreenCO and WWE 2008). See that manual for additional detail and references.

S-8 Use of Pesticides, Herbicides and Fertilizers

- Know characteristics of the application site, including soil type and depth to groundwater to avoid migration of chemicals into groundwater.
- Select pesticides and herbicides best suited to the characteristics of the target site and the particular pest or weed. Half-life, solubility, and adsorption should be compared to site characteristics to determine the safest chemical. Choose least toxic and less persistent sprays whenever possible based on comparison of labels and associated material safety data sheets.
- Employ application techniques that increase efficiency and allow the lowest effective application rate. Carefully calibrate application equipment and follow all label instructions.
- Recognize that it is not realistic for a landscape to be completely pest-free or weed-free. Consider using Integrated Pest Management (IPM) strategies to minimize chemical usage.
- Keep pesticide and fertilizer equipment properly calibrated according to the manufacturer's instructions and in good repair. Recalibrate equipment periodically to compensate for wear in pumps, nozzles and metering systems. Calibrate sprayers when new nozzles are installed.
- All mixing and loading operations must occur on an impervious surface.

Integrated Pest Management (IPM)

Integrated pest management (IPM) (also known as Plant Health Care) is the practice of using targeted biological, chemical, cultural, and physical measures to manage pests while minimizing or eliminating the use of chemical pesticides. IPM measures benefit the landscape and help reduce the likelihood that lawn chemicals will be washed into storm drainage systems in stormwater runoff. The pros and cons of various tools should be weighed and used in an integrated manner to achieve pest control objectives in a safe, effective, and cost-effective manner. Basic IPM practices that can be adopted include:

- Consider spot treatments of pests rather than treating the entire area.
- Consider pest occurrence and history when developing pest management strategies.
- Time pesticide application to minimize host plant damage and maximize pest control.
- Rotate annual garden plants to reduce the buildup of soil-borne pests. Clean up plant litter and remove weeds before they go to seed. Remove infested plant residue from the garden in the fall so that pests do not over-winter there.
- Implement cultural controls such as proper plant selection, planting time, and planting method to reduce susceptibility to insects, pests, and diseases, thereby reducing pesticide usage.
- Implement mechanical and physical controls where practical as an alternative to chemical application. Examples include a wide variety of practices such as "collars" around seedlings, mulching, solar heating, syringing, handpicking, mowing, hoeing, and traps.
- Use biological controls where appropriate to reduce pesticide usage. For example, introduce natural enemies of pests such as lady beetles and green lacewings. (Note: pesticides may kill these natural enemies.)
- Consider applying environmentally friendly chemical alternatives such as insecticidal soaps, horticultural oils, and other such measures when practical and effective and when mechanical approaches are impractical.

Application Practices

- Keep records of pesticide application and provide signage as required by law.
- Do not apply pesticides or herbicides during high temperatures, windy conditions or immediately prior to heavy rainfall or irrigation.
- Treat for and control noxious weeds prior to installing the landscape using an herbicide targeted to the weeds that are present and applied in accordance with the product label.
- Be aware that some pesticide formulations are not compatible with other pesticides and combining them may result in increased potency and phytotoxicity.

Managing Mosquitoes in Stormwater Facilities

(Adapted from: Peairs and Cranshaw 2007)

The key to mosquito control is larval management. Larvae occur in specific areas and can be controlled by modifying the habitat through drainage or insecticides applied to larval breeding sites. Weekly mosquito inspections at stormwater facilities with targeted treatments are frequently less costly and more effective than regular widespread application of insecticides. These inspections can be performed by a mosquito control source and typically start in mid-May and extend to mid-September. Mosquito control measures must be cost effective and environmentally sound. Consider alternatives before application of conventional chemical insecticides.

- **Habitat Modification:** Eliminating breeding sites, or habitat modification, is an effective and long-term solution. Proper maintenance of stormwater BMPs to avoid shallow standing water is important.
- **Natural Predators:** Fish, dragonfly nymphs, and diving beetles are natural predators of mosquito larvae; dragonflies, birds, and bats feed on adults. Consult the Colorado Division of Wildlife for recommendations, restrictions and regulations regarding mosquito-eating fish.
- **Insecticides:** Microbial insecticides such as the bacteria "Bti" (*Bacillus thuringiensis israeliensis*) can be as effective as chemical insecticides. Bti is toxic only to mosquito and midge larvae. It is not hazardous to non-target organisms but can reduce midge populations that serve as fish food.

"Soft" chemical insecticides, such as the insect growth regulator methoprene, are toxic only to insects and other arthropods. They are similar to certain insect hormones and create imbalances in the levels of hormones needed for proper mosquito growth and development. They do not directly harm fish or other wildlife but can reduce the amount of available food.

Mosquito larvae also can be controlled by the application of larvicidal oils or chemical insecticides to the water where they occur or are suspected to occur. Remember, several alternatives to conventional chemical larvicides have been developed because of concerns about applying chemicals to water that might be used for drinking or that contains fish and other aquatic life.

If larval control fails, adult mosquito control may be necessary. Adult control generally is done with insecticide applications using ground equipment or aircraft. For more information visit:

www.ext.colostate.edu/westnile/mosquito_mgt.html or www.ext.colostate.edu/westnile/faq.html.

S-8 Use of Pesticides, Herbicides and Fertilizers

- Maintain a buffer zone around wells or surface water where pesticides are not applied. Consult local regulations and landscape ordinances, as well as the product label, for distances, which may vary depending on the type of chemical and the sensitivity of the waterbody. The purpose of this practice is to keep pesticides and herbicides out of surface waterbodies.

Storage Practices

- Storage areas should be secure and covered, preventing exposure to rain and unauthorized access. Commercial and municipal facilities should provide basic safety equipment such as fire extinguishers, warning signs (e.g., "no smoking"), adequate light and ventilation, and spill clean-up materials should be present. Floors and shelves should be non-porous (e.g., metal, concrete) to prevent sorption of chemicals. If possible, temperature control should be provided to avoid excessive heat or cold. Storage areas should be kept clear of combustible material and debris.
- Commercial operations handling large quantities of pesticides and fertilizers should consult the Colorado Department of Agriculture for storage and handling requirements. Commercial greenhouses and nurseries that are storing recycled water laden with fertilizer may need to provide secondary containment to contain the water in the event of a tank rupture or leak.
- Store chemicals in their original containers, tightly closed, with labels intact. Also inspect them regularly for leaks. Store nitrate-based and other oxidizing fertilizers separately from solvents, fuels, and pesticides to reduce fire risk. Follow the general principle of storing like chemicals together. Dry chemicals should be stored above liquids and on pallets to ensure that they do not get wet.
- Locate chemical storage and maintenance areas, as well as vehicle refueling and maintenance areas, away from wells and surface waterbodies in accordance with local regulations, typically at least 50 to 100 feet away.

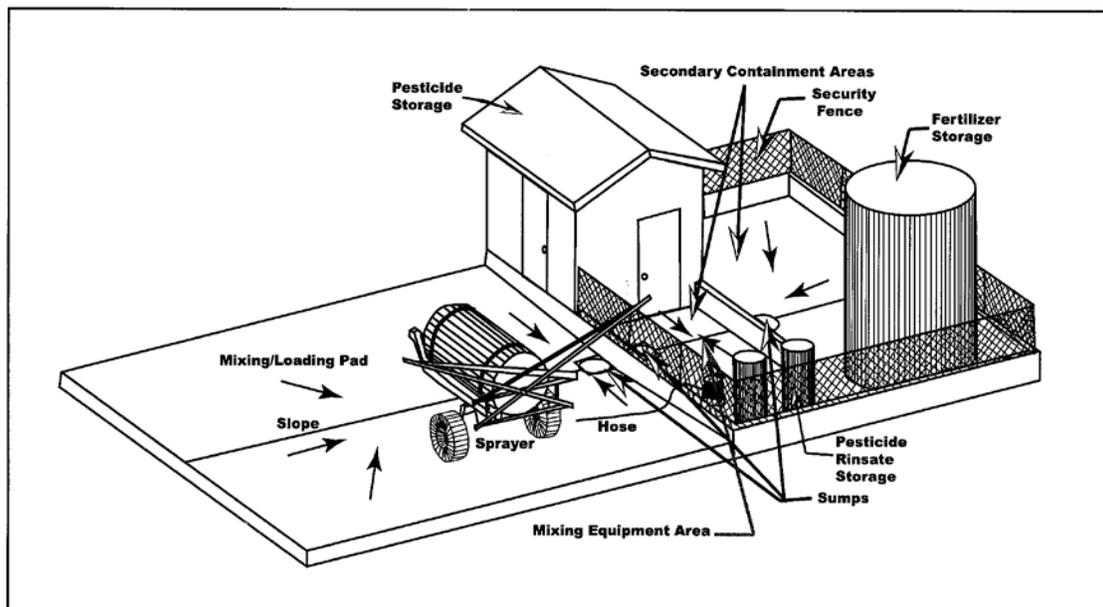


Figure PHF-1. Example Combined Pesticide and Fertilizer Storage and Mixing Area. Figure courtesy of *Designing Facilities for Pesticides and Fertilizer Containment*, Midwest Planning Service, Agricultural Engineering, Iowa State University 1991.

- Make available all Material Safety Data Sheets (MSDSs) in a readily accessible area. A list of all hazardous chemicals in the work place must be completed to ensure that all MSDSs are readily available.
- Do not store large quantities of pesticides for long periods of time. Adopt the "first in, first out" principle, using the oldest products first to ensure that the shelf life does not expire. Buy smaller quantities of pesticides and fertilizers, thereby reducing storage issues.

Spills and Disposal

- Never pour lawn and garden chemicals or rinse water down storm drains (or sanitary drains) and keep chemicals off impervious surfaces (e.g., streets, gutters) during application.
- Follow label directions for disposal. This typically involves triple-rinsing empty containers, puncturing and crushing. All visible chemicals should be cleaned from the container prior to disposal. Use local recycling or hazardous waste collection centers to dispose of unused chemicals.
- Properly manage chemical spills by cleaning them up as soon as possible, controlling actively spilling or leaking materials, containing the spilled material (e.g., with absorbents, sand), collecting the spilled material, storing or disposing of the spilled material, and following relevant spill reporting requirements. "Washing down" a spill with water is not an appropriate cleanup approach.
- Commercial operations should be aware of and comply with basic spill reporting requirements required by law, and keep chemical spill cleanup equipment, personal protective equipment and emergency phone numbers available when handling chemicals and their containers.

For More Information on Legal Requirements

Many federal and state regulations address pesticide, herbicide, and other chemical usage. These sources should be consulted for the most current legal requirements related to chemical handling, storage, application, disposal, and reporting of chemical spills. Examples include the federal Insecticide, Fungicide and Rodenticide Act (FIFRA), the Superfund Amendments and Reauthorization Act (SARA), the Emergency Planning and Community-Right-to-Know Act (EPCRA), and Occupational Safety and Health Administration (OSHA) requirements, particularly the Hazard Communication Standard. Colorado-related regulations include the Colorado Pesticide Applicator's Act, and the Colorado Water Quality Control Act (25-8-601 and 25-8-606), Senate Bill 90-126, and The Agricultural Chemicals and Groundwater Protection Act, which identifies special requirements for facilities handling more than 3,000 pounds (or 500 gallons) of bulk-formulated pesticides.

Description

Proper landscape maintenance, including maintenance of vegetated stormwater BMPs, is important to reduce nutrient and chemical loading to the storm drain system, reduce nuisance flows and standing water in stormwater BMPs, and maintain healthy vegetation that helps minimize erosion. Additionally, when landscapes and vegetated BMPs are over-irrigated, the ground remains saturated and capacity to infiltrate runoff is reduced.



Photograph LM-1. Over-irrigation and overspray can wash fertilizers and lawn chemicals into the storm drain system. These flows can combine with storm runoff and cause nuisance flow conditions in stormwater BMPs. Photo courtesy of the City of Westminster.

Appropriate Uses

Appropriate lawn care practices are applicable to residential, commercial, municipal, and some industrial operations.

Practice Guidelines¹

Practice guidelines for a healthy lawn that reduces pollution during both wet and dry weather conditions include a combination of practices such as mowing, aeration, fertilization, and irrigation. Also, see the Pesticide, Herbicide, and Fertilizer Usage BMP for information on proper use of these chemicals and Integrated Pest Management (IPM) strategies.

Lawn Mowing and Grass Clipping Waste Disposal

- Keep lawn clippings and debris out of gutters. When blowing walkways or mowing lawns, direct equipment so that the clippings blow back onto the lawn rather than into the street, or collect clippings blown onto the street and properly dispose of them.
- Mulch-mowing turfgrass at a height of 2.5 to 3 inches helps turfgrass develop deeper root systems. No more than one-third of the grass blade should be removed in a single mowing. Mulched grass clippings can return roughly 25 to 30% of the needed nitrogen that grass requires to be healthy, thereby reducing fertilizer requirements. Avoid throwing grass clippings onto streets and sidewalks to reduce nutrient pollution to surface waterbodies.
- Minimize thatch development by mowing at appropriate frequencies and heights for the grass type, avoiding overwatering, preventing over fertilization, and aerating the turf.

¹ These practice guidelines have been adapted from the *GreenCO Best Management Practices for the Conservation and Protection of Water Quality in Colorado: Moving Toward Sustainability* (GreenCO and WWE 2008). See this manual for additional detail and references.

Lawn Aeration

- Aerate turf once or twice per year, as needed, in the early spring and/or late fall to aid in capturing the natural precipitation during non-weed germination periods and prior to adding organic materials and fertilizers. Aeration reduces soil compaction and helps control thatch in lawns while helping water and fertilizer move into the root zone.
- A lawn can be aerated at any time the ground is not frozen, but should not be done when it is extremely hot and dry. Heavy traffic areas will require aeration more frequently.
- Do not use spike-type aerators, which compact the soil. Holes should be two to three inches deep and no more than two to four inches apart. Lawns should be thoroughly watered the day before aerating so plugs can be pulled more deeply and easily. Mark all sprinkler heads, shallow irrigation lines, and buried cable TV lines before aerating so those lines will not be damaged.

Fertilizer Application

- Apply fertilizer when needed to achieve a clearly defined objective such as increasing shoot growth, root growth, flowering or fruiting; enhancing foliage color, and plant appearance; or correcting or preventing nutrient deficiencies.
- Because manufactured fertilizers can be relatively high in nutrient content, it is critical to follow the manufacturer's directions, using the minimum amount recommended. Over-application "burns" leaves and may lead to water pollution, thatch buildup, excessive mowing, and weed growth.
- Only apply nutrients the plants can use. Fertilizer labels identify product contents in terms of ratios that indicate percentage of ingredients by product weight.

Phosphorus

Phosphorus is commonly overused and application should be based on soil tests. Phosphorus washing into surface waterbodies leads to excessive algae growth.

Phosphorous does not move out of the soil like nitrogen, so constant additions are unnecessary.

Soil Testing

There are several qualified laboratories in Colorado that provide soils tests to determine recommendations for fertilizer type and application rates. There are also commercially available quick test kits that are less accurate but could be used by a homeowner. Without an analysis, a homeowner may be buying unnecessary fertilizer or applying too much. A \$20 to \$40 soil analysis has potential to save an owner much more.

The CSU Extension program offers a soil testing service. Contact the CSU Extension for your county or visit <http://www.ext.colostate.edu> for more information including a list of laboratories.

- When practical and appropriate, base fertilizer application on soil analysis. Be aware that at many new development sites, soil conditions following grading often no longer consist of topsoil. "Basement" soils with poor texture and low nutrient content may be present. As a result, soil amendment is often needed to improve the physical properties (tilth) of the soil to provide a better environment for plant roots to improve nutrient uptake. Soil analysis can help to identify soil amendments that improve both the physical and nutrient characteristics of the soil, as well as identify fertilization requirements.
- Utilize split applications of slow-release (controlled-release) fertilizer forms such as IBDU, sulfur-coated urea and natural organic-based fertilizers (not to be confused with raw manure) to minimize the risk of nutrients leaching into groundwater or running off in surface water. When properly applied, other forms of fertilizer can also be safely used, provided that over-watering and over-fertilization do not occur.
- When applying fertilizer, broadcast it uniformly over the targeted area of the landscape. Keep fertilizer off streets, sidewalks, and driveways to prevent water pollution. Fertilizer that inadvertently falls on impervious surfaces should be swept back onto the lawn.
- Recommendations for fertilizer application vary among industry professionals. CSU Extension's fertilizer recommendations for established Colorado lawns are provided in the table below. Site-specific conditions should also be considered when determining the need for fertilizer.

Table LM-1. CSU Extension Recommendations for Nitrogen Application Rate

Turfgrass Species	Nitrogen Application Rate in Pounds/1,000 sq. ft.				
	Mid-March to April ^{A,B}	May to Mid-June ^B	July to Early August ^B	Mid-August to Mid-September ^{B,C}	Early October to Early November ^{B,D}
High Maintenance Bluegrass Ryegrass	0.5-1	1	Not Required	1	1-2 (optional)
Low Maintenance Bluegrass	0.5	0.5-1	Not Required	1	1 (optional)
Tall Fescue	0.5	0.5-1	Not Required	1	1 (optional)
Fine Fescue	0.5	0.5-1	Not Required	0.5-1	None
Buffalo grass, Blue Grama, Bermuda grass	None	0.5-1	0.5-1	None	None

Notes:

^A The March-April nitrogen application may not be needed if prior fall fertilization was completed. If spring green-up and growth is satisfactory, delay fertilizing to May or June.

^B Application rates may be reduced by 1/4 to 1/3 when grass clippings are left on the lawn.

^C On very sandy soils do not fertilize turf after late September to prevent nitrogen from leaching into groundwater during the winter months.

^D Apply when the grass is still green and at least 2-3 weeks prior to the ground freezing. Optional nitrogen applications are indicated for use where higher quality or heavily-used turf is present.

Source: T. Koski and V. Skinner, CSU Extension, 2003.

- If possible, properly irrigate turf following fertilization to help grass utilize applied nutrients and to minimize the potential for fertilizer burn. Care should be taken to avoid excessive irrigation that would result in fertilizer being washed away. Similarly, avoid application of fertilizer immediately prior to heavy rainfall.
- Fall is the best time of year to fertilize bluegrass lawns. Over-application of nitrogen fertilizer in April may cause grass to grow too fast before roots can support the growth, resulting in less heat tolerance.
- Generally, the Colorado Nursery and Greenhouse Association recommends waiting until the second growing season to fertilize ornamental (woody) plants. Commercial fertilizer should not be used in the backfill where it comes in direct contact with the roots.
- Maintain a buffer zone around wells or surface waterbodies where fertilizers are not applied to minimize pollution. Consult the fertilizer product label and local regulations and landscape ordinances for appropriate distances. Research in this area is limited; however, CSU Extension recommends a buffer of 6 to 10 feet for mowed turf areas.
- In areas with sandy soils, it is particularly important to avoid over-application of fertilizer that could leach into groundwater. These areas may be particularly well suited to slow-release fertilizer forms and conservative application rates.

Lawn Irrigation

- The approximate amount of water that needs to be applied **each week** for an average, traditional lawn to supplement normal rainfall is listed in Table 2. (Water utilities may provide additional guidance in terms of suggested run-times for various sprinkler types; <http://www.denverwater.org/Conservation/>.)

Table LM-2. General Guideline for Approximate Supplemental Water for an Average Traditional Lawn (inches per week)

Condition ³	April ¹	May	June	July	Aug	Sept	Oct ²
Non-Drought Conditions	1/4"	1"	1½"	1½"	1¼"	1"	1/2"
During Drought Restrictions (approx. 20% reduction)	1/4"	3/4"	1¼"	1¼"	1"	3/4"	1/2"

¹ For established lawns, water may not be required during April. Base decision on weather conditions.

² For established lawns, water is typically not required after Oct 15.

³ Under less-than-average rainfall conditions, the amounts shown in the chart should be increased. If there is greater-than-normal rainfall, then the amount of supplemental water should be reduced.

- Consult with the CSU Extension Turfgrass program for recommendations for irrigating turfgrasses with lower water requirements (e.g. blue grama, buffalo grass). For native grasses, irrigation may be unnecessary or limited to certain conditions.
- Irrigate the lawn uniformly until the soil is moist to a depth of 4 to 6 inches to encourage deep roots. Frequent, light sprinklings moisten only the surface and may cause shallow-rooted turf and increase weed seed germination. Properly maintain the irrigation system to ensure that the irrigation is being applied at appropriate rates and to the turfgrass, not the sidewalk.

- Maintain irrigation systems in good operating condition with uniform distribution of water. "Smart" irrigation controllers and weather sensors can reduce water waste by shutting off irrigation during storm events and helping owners water according to the needs of the plants to replace water lost to evapotranspiration (ET).
- Proper irrigation can minimize the amount of fertilizer and other chemicals that are leached below the root zone of the grass or washed away by runoff.

Description

For obvious safety reasons, snow removal in Colorado is important; however, snow removal and management practices can adversely impact vegetation, soils, water quality, and air quality. Snow removal contractors and operators should be knowledgeable of these potential impacts and choose management measures with the fewest adverse impacts, while still protecting the public safety, health and welfare.



Photograph SIM-1. Snow storage locations should be clearly communicated to snow removal contractors and located where they can drain to stormwater BMPs or landscaped areas. Photo courtesy of WWE.

Appropriate Uses

Snow and ice management procedures are relevant for homeowners, contractors, business owners, and transportation departments.

Practice Guidelines¹

- Physical removal of snow and ice by shovels, snowplows, or snow blowers usually has the least water quality and landscape impacts, provided that storage areas are not piled directly on landscape plants or drained directly to receiving waters. Plan for snow storage locations that minimize water quality and landscape impacts prior to winter.
- Ensure that equipment is calibrated to optimum levels according to manufacturer's instructions.
- Consider placing barriers in targeted site-specific locations (i.e., along streams or direct drainages) to route deicing material away from waterbodies.
- Reduce plowing speed in sensitive areas to prevent exposure to deicing material.
- Designate snow storage areas in locations that enable runoff to be directed to stormwater BMPs for treatment, when practicable.
- The use of deicing chemicals can have a severe impact on plants growing near roads and sidewalks. This can become a water quality issue when plants die and erosion results. Many deicing chemicals are salts and can adversely affect plants through either direct contact with foliage or through buildup in the soil over time. Representative impacts include:

¹These practice guidelines have been adapted from the *GreenCO Best Management Practices for the Conservation and Protection of Water Quality in Colorado: Moving Toward Sustainability* (GreenCO and WWE 2008). See this manual for additional detail and references.

- Direct contact often occurs when the deicing chemicals accumulate on the plants due to drift during application, or when snow or ice containing the chemical is shoveled or blown onto nearby plants. Because these chemicals are salts, direct contact with the foliage may result in burning due to a rapid dehydration effect.
- Buildup of de-icing chemicals in the soil may have even more detrimental effects. Repeated application over time (either during a particular winter season or over many seasons) may damage plants by making their roots unable to take up water. Symptoms will include wilting even when the soil is moist, leaf burn or needle tip burn, stunting or lack of vigor, and/or deficiency symptoms for one or more plant nutrients. The structure of clay soils can be changed to the point that they are unable to support plant life.
- Deicing chemicals that are considered safer to use around plants include calcium magnesium acetate (CMA) or calcium chloride. As with all chemicals used in the landscape, be sure to read and follow label instructions and do not over apply.
- The Colorado Department of Transportation (CDOT) has conducted multiple studies on deicing chemicals. The SeaCrest Group (2001) studied three groups of deicers for CDOT that were chloride-based, acetate-based, and sanding materials. The chloride-based deicers included magnesium chloride (FreezGard Zero® with Shield LS®, Ice-Stop™ CI, Caliber™ M1000, Ice Ban™ M50), calcium chloride (Liquidow®, Armor®), and sodium chloride (road salt and Ice Slicer®). The acetate-based deicers include Calcium Magnesium Acetate (CMA®), Potassium Acetate (CF7®), Sodium Acetate (NAAC®), and CMAK™ (a mixture of CMA and Potassium Acetate). Table 1 contains a partial summary of the study findings.
- Highlights of the SeaCrest (2001) study regarding impacts associated with the three categories include:
 - The chloride-based deicers have been shown to have adverse effects on terrestrial vegetation. Damage to vegetation from deicing salts has been reported to a distance of 100-650 feet. However, there is a wide range of tolerance of different species of plants to the effects of chlorides. The chloride ions in deicers increase the salinity of the soil near the roadways where they are applied. The magnesium and calcium ions increase the stability and permeability of the soil, whereas sodium ions decrease soil stability and permeability.
 - The acetate-based deicers are organic and have different kinds of effects on the environment than the chloride-based deicers. The acetate ions are broken down by soil microorganisms and may result in oxygen depletion of the soil, which can impact vegetation; however, the acetate deicers CMA and Potassium Acetate (CMAK) are not harmful to terrestrial vegetation at the concentrations typically used on roadways. However, NAAC may potentially have an adverse effect on vegetation because of the presence of the sodium ion, which decreases the stability and permeability of the soil. The depletion of oxygen in the soil from the breakdown of the acetate ion can have a negative effect on plant growth, but field evidence of this effect is limited.
 - Sand is not a deicer, but is used for snow and ice control because it improves traction. Sand has a negative effect on water quality as a result of the increased turbidity caused by the presence of sand particles in water. Excessive quantities of sand can smother vegetation.

Table SIM-1. Potential Environmental Impacts of Various Deicers
(Source: The SeaCrest Group 2001)²

Deicer/ Parameter	Inhibited Magnesium Chloride (Liquid)	Caliber + Magnesium Chloride (Liquid)	Ice Ban + Magnesium Chloride (Liquid)	Sodium Chloride/ Ice Slider (Solid)	Inhibited Calcium Chloride (Liquid)	CMA (Solid/ Liquid)	CMAK (Liquid)	Potassium Acetate (Liquid)	NAAC (Solid)	Sand
Chemicals	Trace metals	Trace metals, phosphorus, ammonia	Trace metals, phosphorus, ammonia, nitrates	Trace metals	Trace metals, ammonia, nitrates.	Trace metals	Trace metals, ammonia, nitrates.	Trace metals	Trace metals, phosphorus	Trace metals
Soil	Improves structure, increases salinity	Improves structure, increases salinity, oxygen depletion	Improves structure, increases salinity, oxygen depletion	Increases salinity; decreases stability	Improves structure, increases salinity	Improves structure; oxygen depletion	Improves structure; oxygen depletion	Improves structure; oxygen depletion	Decreases stability; oxygen depletion	Minimal effects
Water Quality	Increases salinity	Increases salinity; oxygen depletion	Increases salinity; oxygen depletion	Increases salinity	Increases salinity		Oxygen depletion	Oxygen depletion	Oxygen depletion	Increases turbidity
Air Quality	Minimal air pollution	Minimal air pollution	Minimal air pollution	Some air pollution	Minimal air pollution	Minimal air pollution	Minimal air pollution	Minimal air pollution	Some air pollution	High air pollution potential
Aquatic Organisms	Relatively low toxicity	Relatively low toxicity	Moderate toxicity	Relatively low toxicity	Relatively low toxicity	Relatively low toxicity	Moderate toxicity	Moderate toxicity	Relatively low toxicity	Can cover benthic organisms and cause mortality
Terrestrial Vegetation	Chlorides damage vegetation	Chlorides damage vegetation	Chlorides damage vegetation	Chlorides damage vegetation	Chlorides damage vegetation	Minimal damage to vegetation	Minimal damage to vegetation	Minimal damage to vegetation	Effects to vegetation not determined	Can cover vegetation and cause mortality
Terrestrial Animals	Does not attract wildlife	Does not attract wildlife	Does not attract wildlife	Attracts wildlife contributing to road kills	Does not attract wildlife	Not expected to attract wildlife	Not expected to attract wildlife	Not expected to attract wildlife	May attract wildlife contributing to roadkills	May cover burrows of small animals and cause mortality

Note: Trace metals that may be present include arsenic, barium, cadmium, chromium, copper, lead, mercury, selenium, and zinc. Soil comments related to structure refer to the affect on soil stability, which relates to erosion. See <http://www.coloradodot.info/programs/research/pdfs/2001/deicers.pdf/view> for more information.

- Where practicable, do not use deicers to melt snow or ice completely, but to make their removal easier. Deicers melt down through the ice or snow to the hard surface, then spread out underneath. This undercuts and loosens the snow so shoveling and plowing can be done. For this reason, it is helpful to apply deicers prior to snow events in some cases.
- Research has shown that the shape of deicing particles affects the speed of their penetration through ice. Uniformly shaped spherical pellets of about 1/16 inch to 3/16 inch penetrate ice faster and more efficiently than other shapes.
- Try to avoid the use of rock salt since it is generally most damaging to plants, soils and concrete and metal surfaces. In areas where deicing salts are unavoidable, select plants with higher salt tolerances.

² The SeaCrest Group, 2001. *Evaluation of Selected Deicers Based on a Review of the Literature*, Report No. CDOT-DTD-2001-15. Prepared for Colorado Department of Transportation Research Branch.

- Do not plow snow directly into streams or wetlands. Snow storage and disposal areas should be located in an area where snowmelt can infiltrate into the ground, filter through a vegetated buffer or be otherwise treated prior to reaching streams and wetlands. Provide adequate storage volume to trap sediment left behind by melting snow and plan regular maintenance to remove accumulated sediment.
- In areas subject to heavy chemical deicing use, flushing the soil with water after the last freeze may alleviate burn potential. Year-round proper plant care will also make plants more tolerant to salt exposure. However, for the overall health of the landscape, the goal should be to reduce or minimize the use of deicing chemicals where they are not necessary for safety reasons.
- If an electric/mechanical snow melting device is used to dispose of removed snow (e.g., The Can snow melter, Snow Dragon, etc.), the owner or operator must obtain the appropriate permit prior to discharge. Snowmelt from melting machines is typically considered process wastewater.

Description

Street sweeping uses mechanical pavement cleaning practices to reduce sediment, litter and other debris washed into storm sewers by runoff. This can reduce pollutant loading to receiving waters and in some cases reduce clogging of storm sewers and prolong the life of infiltration oriented BMPs and reduce clogging of outlet structures in detention BMPs.

Different designs are available with typical sweepers categorized as a broom and conveyor belt sweeper, wet or dry vacuum-assisted sweepers, and regenerative-air sweepers. The effectiveness of street sweeping is dependent upon particle loadings in the area being swept, street texture, moisture conditions, parked car management, equipment operating conditions and frequency of cleaning (Pitt et al. 2004).



Photograph SSC-1. Monthly street sweeping from April through November removed nearly 40,690 cubic yards of sediment/debris from Denver streets in 2009. Photo courtesy of Denver Public Works.

Appropriate Uses

Street sweeping is an appropriate technique in urban areas where sediment and litter accumulation on streets is of concern for aesthetic, sanitary, water quality, and air quality reasons. From a pollutant loading perspective, street cleaning equipment can be most effective in areas where the surface to be cleaned is the major source of contaminants. These areas include freeways, large commercial parking lots, and paved storage areas (Pitt et al. 2004). Where significant sediment accumulation occurs on pervious surfaces tributary to infiltration BMPs, street sweeping may help to reduce clogging of infiltration media. In areas where construction activity is occurring, street sweeping should occur as part of construction site stormwater management plans. Vacuuming of permeable pavement systems is also considered a basic routine maintenance practice to maintain the BMP in effective operating condition. See the maintenance chapter for more information on permeable pavement systems. Not all sweepers are appropriate for this application.

Practice Guidelines¹

1. Post street sweeping schedules with signs and on local government websites so that cars are not parked on the street during designated sweeping days.
2. Sweeping frequency is dependent on local government budget, staffing, and equipment availability, but monthly sweeping during non-winter months is a common approach in the metro Denver urban

¹ Practice guidelines adapted from CASQA (2003) *California Stormwater BMP Handbook*, Practice SC-70 Road and Street Maintenance.

area. Consider increasing sweeping frequency based on factors such as traffic volume, land use, field observations of sediment and trash accumulation, proximity to watercourses, etc. For example:

- Increase the sweeping frequency for streets with high pollutant loadings, especially in high traffic and industrial areas.
 - Conduct street sweeping prior to wetter seasons to remove accumulated sediments.
 - Increase the sweeping frequency for streets in special problem areas such as special events, high litter or erosion zones.
3. Perform street cleaning during dry weather if possible.
 4. Avoid wet cleaning the street; instead, utilize dry methods where possible.
 5. Maintain cleaning equipment in good working condition and purchase replacement equipment as needed. Old sweepers should be replaced with more technologically advanced sweepers (preferably regenerative air sweepers) that maximize pollutant removal.
 6. Operate sweepers at manufacturer recommended optimal speed levels to increase effectiveness.
 7. Regularly inspect vehicles and equipment for leaks and repair promptly.
 8. Keep accurate logs of the number of curb-miles swept and the amount of waste collected.
 9. Dispose of street sweeping debris and dirt at a landfill.
 10. Do not store swept material along the side of the street or near a storm drain inlet.

Changes in Street Sweeper Technology (Source: Center for Watershed Protection 2002)

At one time, street sweepers were thought to have great potential to remove stormwater pollutants from urban street surfaces and were widely touted as a stormwater treatment practice in many communities. Street sweeping gradually fell out of favor, largely as a result of performance monitoring conducted as part of the National Urban Runoff Program (NURP). These studies generally concluded that street sweepers were not very effective in reducing pollutant loads (USEPA, 1983). The primary reason for the mediocre performance was that mechanical sweepers of that era were unable to pick up fine-grained sediment particles that carry a substantial portion of the stormwater pollutant load. In addition, the performance of sweepers is constrained by that portion of a street's stormwater pollutant load delivered from outside street pavements (e.g., pollutants that wash onto the street from adjacent areas or are directly deposited on the street by rainfall). Street sweeping technology, however, has evolved considerably since the days of the NURP testing. Today, communities have a choice in three basic sweeping technologies to clean their urban streets: traditional mechanical sweepers that utilize a broom and conveyor belt, vacuum-assisted sweepers, and regenerative-air sweepers (those that blast air onto the pavement to loosen sediment particles and vacuum them into a hopper).

For more information, see

http://www.cwp.org/Resource_Library/Center_Docs/PWP/ELC_PWP121.pdf

Description¹

Periodic storm sewer system cleaning can help to remove accumulated sediment, trash, and other substances from various components of the storm sewer system including inlets, pipes and stormwater BMPs. Some common pollutants found in storm drains include: trash and debris, sediments, oil and grease, antifreeze, paints, cleaners and solvents, pesticides, fertilizers, animal waste, and detergents. Routine cleaning reduces the amount of pollutants, trash, and debris both in the storm drain system and in receiving waters. Clogged drains and storm drain inlets can cause the drains to overflow, leading to increased erosion (Livingston et al. 1997).

Cleaning increases dissolved oxygen, reduces levels of bacteria, and supports in-stream habitat. Areas with relatively flat grades or low flows should be given special attention because they rarely achieve high enough flows to flush themselves (Ferguson et al. 1997).



Photograph SSC-1. Storm drain cleaning may help to remove pollutant sources and helps to maintain the capacity of the storm pipes.

Appropriate Uses

Storm sewer system cleaning is typically conducted by local governments or state agencies; however, homeowners associations, businesses and industries are usually responsible for maintaining system components on their sites.

Due to the cost and time involved with storm sewer system cleaning, communities may target recurrent problem areas or use another type of prioritization system for maintenance. Also see the BMP Maintenance chapter for BMP-specific maintenance requirements.

Practice Guidelines

A variety of jet/vacuum vehicles can be used to remove debris from stormwater catch basins and pipes. This equipment breaks up clogged/accumulated material with high-pressure water jets and vacuums the material from the sewer. Water used in storm drain cleaning must be collected and properly disposed of, typically at a sanitary wastewater treatment facility.

Simpler methods in localized areas can also include manual trash collection and shoveling from inlets and outlets.

¹ Guidelines adapted from Center for Watershed Protection (2009) *Urban Stormwater Restoration Manual Series 8: Municipal Practices and Programs*.

Frequency and prioritization of storm sewer cleaning is affected by multiple factors such as the activity and intensity of use in the tributary area (e.g., parking lot, stadium), storm sewer system design, municipal budgets (staff and equipment), and other factors.

To be most effective, storm sewer cleaning needs an effective recordkeeping system and clearly defined procedures. CWP (2009) recommends the following practices:

- **Tracking:** The location and maintenance of storm drains should be tracked using a database and spatial referencing system (e.g., Global Positioning System or Geographic Information System). Additionally, knowing the type and era of the storm drain system may be of use since some inlets/catch basins are designed to be self-cleaning while others have some trapping capacity.
- **Frequency:** Should be defined such that blockage of storm sewer outlet is prevented and it is recommended that the sump should not exceed 40- 50 percent of its capacity. Semi-annual cleanouts in residential streets and monthly cleanouts for industrial streets are suggested by Pitt and Bissonnett (1984) and Mineart and Singh (1994). More frequent cleanouts should be scheduled in the fall as leaves can contribute 25% of nutrient loadings in catch basins.
- **Technology:** A variety of methods of cleaning catch basins are available, including manual cleaning, eductor vehicles, vacuum cleaning and vacuum combination jet cleaning. Choose the approach that is most effective for site conditions, taking into consideration budget, equipment, and staffing constraints.
- **Staff training:** Operators need to be properly trained in catch basin maintenance including waste collection and disposal methods. Staff should also be trained to report water quality problems and illicit discharges.
- **Material disposal:** Most catch basin waste is of acceptable quality for landfills. If it is suspected that catch basin waste contains hazardous material, it should be tested and disposed of accordingly. Maintenance personnel should keep a log of the amount of sediment collected and the removal date at the catch basin.