

Londonderry Township

MCM #6: Pollution Prevention/Good Housekeeping for Municipal Operations

- **Objective1:** Complete an Operations and Maintenance (O&M) plan for all municipal operations.
- **Objective2:** Manage maintenance activities, schedules and inspection procedures to reduce the potential for pollutants.
- **Objective3:** Operations training program for Township staff, Public Works, and Golf Course Maintenance

Londonderry Township, Dauphin County, PA is a township of approximately 5,200 residents that has been required to develop, implement, and enforce a stormwater management program in order to meet the requirements of their permit and ensure that controls are in place to prevent or minimize water quality impacts. The Township is able to control its operations, within the context the MS4 permit, by implementing an operations and maintenance plan. This plan will include duties for each member of each department for facilities under control of the Township. In some cases, these operations will be on spreadsheets and checklists to prompt employees of proper procedures. This will also allow management to track movements, and improve efficiency in the future.

Minimum Measure Objective: The purpose of developing the Operations and Maintenance plan is to implement a program that includes training components and has the ultimate goal of preventing or reducing pollutant runoff from municipal operations. This program will focus on areas of greatest control by the Township. This includes municipally-owned properties, roads, easements, and vehicle operations. The Township will also provide employee training to prevent and reduce stormwater pollution from activities such as parks and open space maintenance, fleet and building maintenance, and stormwater system maintenance.

- **Objective1:** Complete an Operations and Maintenance (O&M) plan for all municipal operations.
 - o The Township will complete the O&M plans for all municipal operations, including operations at the golf course. During April of the current permit year, training will be held on the usage of O&M, general housekeeping, and spreadsheet data entry. Inspection sheets will be collected from public works monthly, and kept in the MS4 office. The plan will include but is not limited to:
 - **Management practices, policies, and procedures to reduce or prevent the discharge of pollutants to the regulated MS4;**
 - **Schedule for maintenance activities, routine activities, and inspection procedures to reduce the potential for pollutants to reach the regulated MS4;**

- **Implement controls for reducing or eliminating the discharge of pollutants from streets, roads, highways, municipal parking lots, maintenance and storage yards, waste transfer stations, fleet or maintenance shops with outdoor storage areas, and salt/sand (anti-skid) storage locations and snow disposal areas;**
 - **Procedures for the proper disposal of waste removed from the Township's regulated MS4 and municipal operations, including dredge spoil, accumulated sediments, trash, household hazardous waste, used motor oil, and other debris**
 - **Accountability:** A well-developed Operations and Maintenance plan will establish procedures for municipal activities to reduce their impact on the Township's MS4. This plan will manage municipal operations to prevent routine action from causing any impact on the MS4. Trainings accompanied by spreadsheets will prompt employees to complete tasks, and management staff can use this data to set budgets and reduce overall impacts to the MS4 in the coming years.
- **Objective2:** Manage maintenance activities, schedules and inspection procedures to reduce the potential for pollutants, including a Spill prevention and control and containment plan (SPCC).
 - During the current permit year, the public works and golf course maintenance facilities will continue to follow the inspection process outlined in the SPCC plan. Public works and golf course staff will inspect all 55-gallon containers and fuel tanks during the first week, every month. Once per quarter, the MS4 Department will evaluate inspection sheets for completeness. The SPCC Plan will be evaluated once per permit cycle. This evaluation is to keep the SPCC plan up to date.
 - **Justification:** Spill prevention plans can serve to prevent significant discharges into the MS4, and provide employees with training on how to properly handle the spill if it does occur. Municipal employees will know how to properly deploy all equipment in a spill kit, and when to contact management and/or emergency services. Employees that are aware and confident in their abilities will be able to make quick and educated decisions that will have the best outcome for the Township's MS4 and nearby stream health.
- **Objective3:** Operations training program for Township staff, Public Works, and Golf Course Maintenance
 - **Measurable Goal:** During the current permit year, training sessions will be held for the Public Works department, the Golf Course maintenance crew and Township staff. These training sessions will be developed to follow the topics covered in the Operations and Maintenance Plan.
 - General Stormwater and Permit Awareness: Board of Supervisors and Public
 - Illicit discharge detection and elimination and permit awareness: all township staff
 - Pollution prevention for fleet maintenance and storage yards: Public Works and Golf Course Maintenance
 - Catch basin and inlet structure cleaning and inspection: Public Works

- Tracking sheets and Filing System: Public Works and Golf Course Maintenance
 - Pollinator garden, rain garden, and buffer maintenance: MS4 Environmental Department
 - Spill kits and spill response: Public Works and Golf Course Maintenance
 - Pollution prevention for fleet maintenance and storage yards: Public Works and Golf Course Maintenance
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 - Salt/De-Icing: Public Works
- o **Justification:** Annual training will ensure every employee is confident in his/her ability to complete their job description in a way that is not harmful to the MS4. They will be knowledgeable about current NPDES permit requirements, and be able to answer simple questions if prompted by DEP or EPA during an inspection. Proper training also ensures that employees maintain safe working areas and do not put themselves in situations that are hazardous to their health, the environment, and/or property. The United States Golf Association (USGA) has developed best management practices for golf courses to reduce water usage and increase infiltration. Using these ideas along with others, the Township will develop best management practices that address water quality, environmental health, and economic benefits, specifically associated with golf course management.

Revised 1/8/2021.

Updated to better align with permit requirements 7/25/2019.

Updated to reflect current Township programs and abilities 6/10/2019.