Chapter 8: County General SWPPP

8.0 Applicability

This Stormwater Pollution Prevention Plan (SWPPP) is intended to limit Stormwater runoff pollution resulting from Montgomery County Governmental operations that occur within Montgomery County, TN., but outside the city limits of Clarksville, TN and outside the reservation boundaries of Fort Campbell, KY. This SWPPP only applies to Montgomery County Departments and operations that:

1.) Store more than the EPA listed reportable quantity of any chemical;
2.) Store bulk quantities of materials that could be washed into the MS4 by Stormwater runoff (i.e.: sand, dirt, salt, etc.);
3.) Are required to apply for and maintain any National Pollution Discharge Elimination System (NPDES) permit, NPDES permit waiver, waste water treatment permit, or privately operated waste treatment system operation or discharge permits.
4.) Perform operations that may result in Stormwater runoff contaminated with silt or other pollutants being released
5.) Perform operations that may result in chemical spills that are not required to be reported to the US Coast Guard
6.) Perform maintenance, construction or operations that require a TDEC Aquatic Resource Alteration Permit (ARAP), or a TDEC or Federal 401 Water Quality Certificate, or a US Army Corps of Engineers 404 Permit.
7.) Perform vehicle or equipment maintenance
8.) Perform equipment or vehicle cleaning
9.) Perform building maintenance or construction

Montgomery County operations that occur within the city limits of Clarksville, TN, and which may result in the contamination of Stormwater runoff, should obtain the approval of the Clarksville Stormwater Manager, in addition to the Montgomery County Stormwater Manager. Copies of all permits and letters of findings issued by the Clarksville Stormwater Manager should be submitted to the Montgomery County Stormwater Manager.

EPA reportable quantities are listed on the Material Safety Data (MSD) information for chemicals in common usage throughout the County. All Montgomery County Departments are required to maintain for all chemicals being used or stored on site. For sand, dirt, salt, etc., bulk quantities are considered to be 2000 pounds (1 ton) or more. Most Montgomery County Departments do not store or use materials that fall in these categories or amounts and therefore are not required to follow SWPPP requirements.

It is the responsibility of each Montgomery County Department to ensure that all relevant water quality or waste discharge permits or permit waivers are current and that their department meets all the conditions of those permits. These permits may include, but are not limited to:

- National Pollution Discharge Elimination System (NPDES) Permit
- NPDES Permit Waiver (including waste water treatment and discharge permits)

- TDEC Waste Treatment System Operators Permit
- TDEC Aquatic Resource Alteration Permit (ARAP)
- TDEC or Federal 401 Water Quality Certificate
- US Army Corps of Engineers 404 Permit

Some specific departments are exempt from maintaining a SWPPP based on the type of operations conducted:

- Archives
- Accounts and Budgets
- Building and Codes
- Clerk and Master
- Community Corrections
- Court System
- Court Safety Program
- County Mayor's Office Administrative Staff
- Election Commission
- Human Resources
- Information Systems
- Planning Commission
- Public Library
- Property Assessor
- Register of Deeds
- Veteran's Services
- Soil Conservation Department
- Extension Service

The above listed departments are obligated to meet the requirements of this SWPPP if the operational nature of the department changes to meet the eligibility requirements listed above. Questions on SWPPP or permit requirements and applicability may be directed to the Montgomery County Stormwater Coordinator.

An operational review of the Animal Control facility has shown that there is little or no chance for pollutive Stormwater discharges. The facility is obligated to meet the requirements of this SWPPP if the operational nature of the department changes to meet the eligibility requirements listed above. Questions on SWPPP or permit requirements and applicability may be directed to the Montgomery County Stormwater Coordinator.

Some county departments must operate under permits that are more restrictive that those specified herein, and therefore are not specifically required to meet the requirements of this SWPPP. These departments include:

- BiCounty Landfill
- Emergency Management Agency
- Heath Department

8.2 Annual SWPPP Review

If a SWPPP is required for a Department's operations, a copy of the SWPPP must be maintained in the department offices and must be made available for review upon request. Any changes to the SWPPP must be submitted to the Montgomery County Stormwater Coordinator for review and approval. The SWPPP must be reviewed and approved by the Department Supervisor annually.

8.3 Regulatory Notes, Documents and References

The following documents and/or references are to be used to plan and execute all work conducted within Montgomery County:

(1) The Montgomery County Stormwater Management Regulations Resolution (#13-2-2)

(2) The Montgomery County Water Quality Buffer and Illicit Discharge Detection and Elimination Program Regulations Resolution (#08-1-2)

(3) The Montgomery County Stormwater Management Manual

(4) The Tennessee Guide to the Selection and Design of Stormwater Best Management Practices: A Guide for Phase II MS4 Communities for Protecting Postconstruction Stormwater Quality and Managing Stormwater Flow (also known as the TDEC Manual for Post Construction)

(5) The Tennessee Erosion Prevention and Sediment Control Handbook

(6) The Clarksville Montgomery County Subdivision Regulations

(7) All Montgomery County Stormwater Management Program General Policy and/or Operating Procedure approved by the Montgomery County Building Commissioner

(8) TDEC Small Municipal Separate Storm Sewer System Permit #TNS 075621

Copies of these documents can be studied at the Montgomery County Building and Codes offices. Most of the listed references are available for download online at:

www.mcgtn.org/stormwater

If any provision of this SWPPP and any other provisions of law impose overlapping or contradictory requirements, or contain any restrictions covering any of the same subject matter, that provision which is more restrictive or imposes higher standards or requirements shall govern. The provisions of this SWPPP do not relieve the applicant from provisions of any other

applicable law, resolution or regulation not explicitly repealed by the State of Tennessee, the Montgomery County Stormwater Management Resolution and this manual.

8.4 Erosion Prevention and Sediment Control (EPSC) Requirements and Inspections

Construction and maintenance that requires soil disturbance of greater than 1 acre within Montgomery County will follow all TDEC and Montgomery County Stormwater Program requirements. Information with specific erosion control requirements are available from the Montgomery County Building and Codes office.

The Stormwater Program is responsible for reviewing all plans that have the potential for disturbing more than 1 acre of soil. Grading, Drainage and Erosion Control (GDEC) plans must be submitted before any earth disturbing activity begins. GDEC plan submission requirements are available from the Montgomery County Building and Codes office.

Construction sites are subject to random erosion control inspections by the Montgomery County Stormwater Inspector to ensure compliance with TDEC and Montgomery County regulations.

8.5 Construction Site Notice of Coverage and SWPPP Requirements

The Montgomery County Stormwater Resolution has specific requirements for documents that are required to be posted/located at all county construction sites. Any construction site resulting in 1 acre or more of disturbed area or larger is required to follow all Montgomery County Stormwater program requirements. It is not necessary for construction sites under County control to obtain a TDEC NOC if the site is less than one acre in size, unless the site is associated with a larger overall project. It is important to include the Montgomery County Stormwater Coordinator when planning any County construction projects to ensure that all State and Federal requirements are met. In general, the following policies will satisfy the State requirements for documentation.

1.) Each site must have a valid Tennessee Department of Environment and Conservation (TDEC) Notice of Coverage (NOC) **posted** on site. The Notice of Intent (NOI) alone is not acceptable. After the Notice of Termination (NOT) is granted by TDEC, any additional work will require each individual contractor/builder on that site to submit a NOI and post a valid NOC on the construction site. Copies of all NOI, NOC and NOT forms submitted and issued must be submitted to MCBC.

2.) Stormwater controls must be inspected by someone with Tennessee EPSC Level 1 certification at least twice a week, no less than 72 hours apart. Each inspection must be documented on the TDEC Inspection form (records are to be kept on site). The name, address and contact information of the inspector must be submitted to MCBC.

3.) A Stormwater control inspection must be preformed and documented on appropriate TDEC Inspection form immediately before and after a rain event (records of these inspections and rain fall measurements are to be kept on site).

4.) Each site must have a valid Stormwater Pollution Prevention Plan (SWPPP), a copy of which must be submitted to MCBC and a copy kept on site. The SWPPP will list a Tennessee EPSC Level 1 certified Stormwater Contact who is responsible for all erosion control inspections for that site.

The SWPPP, Stormwater controls inspection forms, and a copy of the NOC must be kept on site in a marked, water-proof structure that can be easily located. It will be satisfactory if up-to-date copies are kept in a secure location off site if vandalism is a problem. MCBC must be notified of the location of the records and posted NOC. Copies of all NOI, NOC and NOT permits issued by the state must be submitted to the Montgomery County Building and Codes Department.

8.6 Non-Hazardous Spill Response

Spills involving chemicals with properties that are known to have no significant hazards to people may be cleaned up by department personnel. It is the responsibility of each Department Supervisor to review the chemicals used in their operations, and use MSD documents to identify hazard potential from potential spill events.

For spills that may result in personal injury (falls, minor skin irritations, etc.) It is a good idea to develop a spill response plan and to keep a simple spill response kit available for use. A simple spill kit generally includes absorbent materials, a broom and dustpan, latex gloves and eye protection. Dry remediation techniques will be used to clean up the spilled materials.

Never:

- Wash a spill into a storm drain or water body
- Leave a spill without cleaning it up
- Leave a spill without notifying a supervisor

8.8 Fuels, Oils and other Vehicle and Equipment Fluid Spills

Each county maintenance and fueling site will have a Spill Prevention and Control Plan (SPCP) to address fuel, lubricant, hydraulic fluid, coolant or other vehicle and equipment fluid spill event. Dry remediation techniques will be used to clean up the spilled materials.

Spill response kits consisting of absorbent materials (Oil Dry or equivalent), dedicated storage containers for the disposal of used absorbent materials, and personal protective equipment (PPE) will be pre-positioned as required for each site. The minimum PPE will consist of disposable gloves impervious to petroleum products and protective goggles. The spill kits should include any additional materials necessary to address the specific hazards at each location. It is the

responsibility of each Department Supervisor to ensure that all necessary precautions, equipment and PPE are available to address spills or other hazardous conditions.

All personnel will be trained to properly respond to spill events. This training will include proper immediate actions to take in the event of a spill, the locations of spill response kits, proper disposal of used absorbent materials, use of PPE, and procedures for reporting spills.
The Stormwater Coordinator is available on request to assist departments in developing a SPCP.

It is important to think ahead and take proactive measures to protect personnel, equipment, facilities and the environment. Using precautionary measures such as secondary containment systems and pre-positioned spill response equipment will reduce risks to county employees.

Never:

- Wash a spill into a storm drain or water body
- Leave a spill without cleaning it up
- Leave a spill without notifying a supervisor

8.8 Spill Response

Each site must be proactive in addressing spills, and is required to follow all spill prevention, storage and response requirements listed in the most current version of the Materials Safety Data (MSD) information for each chemical stored and used at that facility. A facility specific Spill Prevention and Control Plan (SPCP) is required to address spill events.

Spill response kits will consist of absorbent materials, storage containers appropriate for the disposal of contaminated absorbent materials, necessary tools and personal protective equipment (PPE) sufficient to protect personnel from the effects of the hazardous materials they may be exposed to. The spill kits will be pre-positioned near areas where hazardous material spill events may occur, but far enough away to allow safe access during the spill event. The spill kits should include any additional materials, response equipment, and the PPE necessary to address the specific hazards at each location. It is the responsibility of each Department Supervisor to ensure that all necessary precautions, equipment and PPE are available and adequate to address spills or hazardous conditions.

Spill containment BMPs and equipment will be used to prevent spilled materials from leaving the site due to the actions of wind or Stormwater runoff.

All personnel will be trained to properly respond to hazardous material spill events. This training will include proper immediate actions to take in the event of a spill, the locations of spill response kits, proper disposal of used absorbent materials, use of PPE, and procedures for reporting spills. Dry remediation techniques will be used to clean up the spilled materials.

Never:

- Wash a spill into a storm drain or water body
- Leave a spill without cleaning it up

- Leave a spill without notifying a supervisor

8.9 Specific Pollutant Prevention Measures (Vehicles and Equipment Maintenance)

Most potential Stormwater pollutants will be generated by vehicle and equipment leakage (oil, gasoline, brake fluid, transmission fluid, hydraulic fluid, engine coolant, etc.), vehicle and equipment washing, and deposition of biologically contaminated fluid (bodily fluids).

When a vehicle is leaking, it shall be sent to the repair shop for repair as soon as possible. If it is not possible to schedule an immediate repair, a drip pan will be used to collect the leakage. If the leak is a minor one and does not warranting immediate repair, then a drip pan should be placed under the unit until routine servicing is scheduled. Leaks that result in vehicle or equipment fluids being deposited on the ground will be treated as a spill event and responded to as required.

When a spill occurs, a granulated, absorbent material is to be used to absorb the fluid and keep the fluid from spreading. It should be applied in sufficient quantities to absorb all the leaking material. **Under no circumstances will leaked material be swept or washed into any Stormwater drain system.** Once the absorbent material has been applied, it should be given enough contact time to completely absorb the spilled material. Once sufficient time has been allowed for complete absorption, the used absorbent material should be swept up & disposed of in an approved container. All used absorbent materials will be transported to the landfill for proper disposal at regularly scheduled intervals.

Spills that occur during repair activities should be handled in the same manner as outlined above. Used vehicle and equipment fluids should be stored properly (safe storage requirements will be based on the material in question) and disposed of appropriately.

When refueling any vehicle, there will be at least 1 person monitoring the fueling operation at all times. **AT NO TIME will the person walk away from an active fueling operation**. Should a spill occur the supervisor MUST be notified as soon as practical after ensuring that the cause of the fuel spill has been contained and there is no possibility of contamination spread. Spill kits placed near fuel pumps will have additional supplies to contain and absorb spilled fuel. Storage and disposal procedures for the used absorbent material will be the same as listed above. Caution should be exercised to avoid fire.

If installed, oil separators should be inspected routinely and cleaned out as required to ensure no contaminants are entering the sewer or septic system. Cleaning is to be accomplished by properly trained personnel, using techniques that are accepted and approved by the Department Supervisor. Material removed from an oil separator should be properly stored and disposed of using techniques that are accepted and approved by the Department Supervisor. Equipment that is used for the cleanout procedures should be considered contaminated and properly cleaned before being used for other purposes. Personnel performing the cleanout will wear appropriate PPE. Each location that has an oil separator should document inspections and cleanings, and keep these records on file at that location.

8.10 Specific Pollution Prevention Measures (Vehicle and Equipment Washing)

Proper planning and specific management practices can reduce wash water runoff to storm drains and help lessen the impact vehicle and equipment wash water discharges cause to the environment by transporting detergents and automotive pollutants.

Some of these management practices include:

- Using a commercial car wash.
- Washing vehicles on gravel, grass or other permeable surfaces, or in areas that drain to permeable surfaces.
- Blocking off storm drains during charity car wash events.
- Pumping or directing soapy water from car washes into a sanitary sewer drain. If pumping into a drain is not feasible, direct car wash water onto grass or landscaping that provides filtration.
- Using hoses with nozzles that automatically turn off when left unattended.
- Using only biodegradable soaps.

Prior to washing, it should be determined if there has been any oil/antifreeze/hydraulic fluid that has leaked onto the floor. If so, then these fluids must be cleaned up PRIOR to vehicle washing. If a vehicle is leaking, appropriate containment measures should be used to collect the leaking material and the vehicle should be repaired to stop the leak. After it has been determined that there are no contamination or leaks, it is permissible to begin washing the vehicle. If conditions permit, vehicles are to be moved to outdoor areas that drain to permeable surfaces (i.e.: grass or gravel areas) for washing. It is strongly recommended that low phosphate detergents be used for vehicle washing. Wash water runoff should never be directed into Stormwater drains.

When cleaning equipment that has been biologically contaminated with blood or other body fluids, these fluids must be removed before primary cleaning can begin. The equipment must be taken to an area where the wash water can be directed to a drain which is connected to a sanitary sewer or septic system. Under no circumstance will biologically contaminated equipment be washed out in any other manner. After decontamination, the vehicle can be cleaned following standard guidelines listed above.

8.11 Specific Pollutant Prevention Measures (Facility Maintenance)

General facility maintenance activities include mowing and trimming, painting, fertilization, pest control, weed control, and all of the chemical and petroleum handling that is associated with these activities. Facilities maintenance personnel should be trained in properly operating procedures and provided with the best management practices required to protect Stormwater from the potential hazards associated with these maintenance activities.

When using fertilizers, pesticides and herbicides, mixing instructions should be carefully followed. The application of these chemicals should follow manufacturer recommendations for safe use, and should be based on actual need as determined by testing (soil, turf, insect presence, etc.). Use the least toxic product possible for each application. Avoid over-application or application to non-pervious areas to prevent these products from washing into Stormwater drains, ground water or surface water. Never mix products to save time.

Excess dry materials (i.e.: granulated fertilizers and pesticides), which are inadvertently deposited on sidewalks and streets, should be collected using dry clean-up methods or properly distributed by sweeping or blowing onto grassy areas. Avoid spraying liquid fertilizers and pesticides onto impermeable surfaces.

Unused paint, pesticide, herbicide, fertilizer, cleaning products and other chemicals should be disposed of as hazardous waste. Under no circumstances should these products be stored outside, dumped on the ground, or poured down storm drains. Petroleum products should be recycled or disposed of properly. Empty chemical or pesticide containers should be disposed of properly. Reuse of these containers should be avoided.

Grass cuttings and plant waste should be disposed of properly, never dumped in storm drains or where Stormwater will wash them into storm drains or county waters. If possible, compost plant waste for later landscaping use.

8.12 Bulk Material Storage

Dry bulk materials (sand, dirt, salt, etc.) must be stored in ways that minimize the likelihood that wind or storm events will carry the materials into area drainages or into the Waters of Montgomery County. Storage in enclosed shelters or in original shipping containers (if applicable) is preferred. If this is not possible, materials that can be inadvertently transported off site by vehicular traffic or wind should be contained is a manner that limits material spread. Use silt fencing to prevent movement of the material by Stormwater runoff, as required.

Liquids should be stored in areas that provide for secondary containment to limit material spread in the event of a spill or leak. Always leave materials in the original shipping containers until it is needed.

8.13 County Employee Training

All Montgomery County employees who work in departments that require a SWPPP, are required to have documented yearly training in good housekeeping, illicit discharge detection and reporting, and pollution prevention best management practices that are specific to the department where they work. The training should cover pollution prevention, illicit discharge recognition and reporting, and spill response.

Training materials in pollution prevention best management practices and illicit discharge recognition and reporting are available from the Montgomery County Stormwater Coordinator. The employee training documentation records are required to be kept for seven (7) years.

The Stormwater Coordinator will provide training for Department Supervisors and designated subordinates on an as-needed basis. General employee training will be provided only on request.

8.14 Site Inspection Requirements

Department heads are responsible for scheduling, performing and documenting routine inspections of sites covered under this SWPPP. The inspections are required to be conducted monthly. Deficiencies should be noted and the correction documented. Records of the inspections and resultant corrections should be maintained on site for three (3) years.