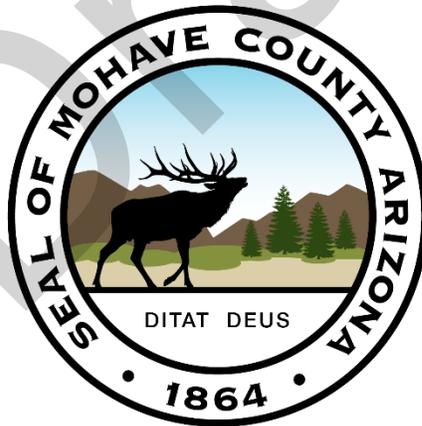


**POLLUTION PREVENTION AND GOOD
HOUSEKEEPING PROGRAM
FOR
MUNICIPAL OPERATIONS
MOHAVE COUNTY, ARIZONA**

In fulfillment of the requirements associated with
Small Municipal Separate Storm Sewer System (MS4)
General Permit (AZG2016-002)

Prepared:
June 21, 2017

Updated:



Mohave County:
Department of Development Services
Department of Public Works
Flood Control District

Certification Statement

Permittee: Mohave County

Permit Number: AZG2016-002

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I certify, under penalty of law, that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry or the person or persons who manage the system, or those directly responsible for gathering information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware there are significant penalties for false information, including the possibility of fine and imprisonment for knowing violations.

Timothy Walsh – Director
Mohave County Development Services

Date

Steven Latoski – Director
Public Works Development Services

Date

Table of Contents

Title	Page
Introduction and Background.....	6
Urbanized Area - Geographical Limits.....	6
Receiving Waters	6
Applicability	8
Obligation to Comply	8
Reporting Year	8
Inventory.....	8
Wet Season.....	13
Program Responsibilities.....	13
Prioritization.....	14
Inspections	14
Site-Specific Pollution Prevention and Good Housekeeping Plan.....	16
Plans of Action	20
Public Involvement Procedures	21
Annual Report	21
Staff Training	22
Record Retention.....	22
Additional Resources.....	23

List of Figures

Title	Page
Figure 1: Permit Areas within Unincorporated Mohave County.....	7
Figure 2a Municipal Operations within the North Lake Havasu Permit Area.....	9
Figure 2a Municipal Operations within the North Lake Havasu Permit Area.....	10
Figure 2a Municipal Operations within the North Lake Havasu Permit Area.....	11
Figure 2b Municipal Operations within Horizon Six Permit Area	12
Figure 3 Pollution Prevention and Good Housekeeping Plan Process.....	16



List of Attachments

Title

Attachment 1 – Tables of Municipal Facilities

Attachment 2 - Inspection Forms

Attachment 3 – Sample Stormwater Pollution Prevention Plan

Draft



Glossary of Acronyms

A.A.C.	Arizona Administrative Code
ADEQ	Arizona Department of Environmental Quality
A.R.S	Arizona Revised Statute
AZPDES	Arizona Pollution Discharge Elimination System
BMP(s)	Best Management Practices
CFR	Code of Federal Regulations
CGP	Construction General Permit
CASRC	Construction Activity Stormwater Runoff Control
CWA	Clean Water Act
DMR	Discharge Monitoring Report
EPA	Environmental Protection Agency
ERACE	Environmental Rural Area Cleanup Enforcement
GHKP	Pollution Prevention and Good Housekeeping Program
GIS	Geographical Information System
IDDE	Illicit Discharge Detection and Elimination
MCM	Minimum Control Measures
MEP	Maximum Extent Practicable
MS4	Municipal Separate Storm Sewer Systems
MSGP	Multi-Sector General Permit (non-mining)
NOI	Notice of Intent
NOT	Notice of Termination
NPDES	National Pollution Discharge Elimination System
O&M	Operations and Maintenance Plan
PCSMP	Post-Construction Stormwater Management Plan
PTOW	Public Owned Treatment Works
SMO	Stormwater Management Ordinance
SWMP	Stormwater Management Plan
SS-GHKP	Site Specific Pollution Prevention and Good Housekeeping Plan
SWPPP	Stormwater Pollution Prevention Plan
TMDL	Total Maximum Daily Load



Glossary of Commonly Used Terms

Best Management Practice(s): methods, measures or practices to prevent or reduce discharges and includes both structural and nonstructural controls and operation and maintenance procedures.

Construction Activity: Earth-disturbing activities such as clearing, grading, paving, excavating, stockpiling of fill material and other similar activities, including support activities such as temporary asphalt or concrete plants, on areas greater than one (1) acre in size or areas less than 1- acre that part of a larger plan of development or sale (40 CF2 122.26(b)(14)(x) and 40 CF2 122.26(b)(15)(i)). Such areas are subject to the NPDES and/or the AZPDES construction permits.

Construction General Permit: Permit that authorizes the discharge of stormwater from construction activities into a Municipal Separate Storm Sewer System that leads to an Arizona surface water or directly into an Arizona surface water.

Disturbance: The result of altering soil from its native or stabilized condition thereby rendering it subject to movement or erosion by water to potentially become, or becoming a pollutant in site stormwater runoff; also means soil disturbance.

Erosion: The wearing away of land surface by water or wind which occurs from weather or runoff, but is often intensified by human activity.

Facility: any “point source” or any land, building, installation, structure, equipment, device, conveyance, area, source, activity or practice from which there is, or with reasonable probability may be, the introduction of stormwater to the County MS4 or Storm Drainage Systems connected to the MS4 such that is subject to regulation under the AZDES/NPDES program.

Mohave County MS4: a conveyance or system of conveyances (including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, man-made channels or storm drains) which are owned and operated by Mohave County, discharge into waters of the United States, and are designed or used for collecting or conveying stormwater, but are not part of a combined sewer system and are not part of a publicly-owned treatment works (POTW).

Multi-sector General Permit: Permit that authorizes the discharge of stormwater from facilities associated with any one of twenty-nine (29) industrial activities into a Municipal Separate Storm Sewer System that leads to an Arizona surface water or directly into an Arizona surface water.

Municipal Operations: any facility that is owned, operated or maintained by the governing entity.

Non-Stormwater Drainage: Any drainage that is not composed entirely of stormwater.

Operator: a party or parties that either individually or taken together have operational control over the site specifications, including the ability to make modifications in specifications and they have day-to-day operational control of activities at the site necessary to ensure compliance with plan requirements and permit conditions.



Owner: The person, persons, or entity whose name appears on the title or deed to the subject property or properties.

Outfall: any location within a project site where stormwater runoff or a non-stormwater discharge exits the site.

Operation and Maintenance Plan: a legally recorded document or section within a legally recorded document that specifies the processes, procedures and actions that will be implemented to ensure the long-term operation and maintenance of the post-construction stormwater BMP's. The plan, which is to be reviewed and accepted by Mohave County, will delegate to a party or entity that is tied to the property (e.g. Homeowner's Association, Neighborhood Association, Community Association, Property Managing Company or Condominium Association) the responsibilities of implementation of the plan in perpetuity with the understanding that failure to perform the duties specified in the plan can lead to fines and civil penalties to be assessed to the owners of the property.

Point Source: any discernible, confined, and discrete conveyance, including but not limited to any pipe, ditch, channel, tunnel, conduit well, discrete fissure, container, rolling stock, concentrated animal feeding operation, landfill leachate collections system, vessel or other floating craft form which pollutants are or maybe discharged, excluding return flows from irrigated agriculture or agriculture stormwater runoff.

Pollutant: sediment, fluids, toxic waste, dredged spoil, solid waste, substances and chemicals, pesticides, herbicides, fertilizers, and other agricultural chemicals, incinerator residue, sewage, garbage, sewage sludge, munitions, petroleum products, equipment, rock, sand cellar direct (e.g. overburden material) and mining, industrial, municipal and agricultural wasters or any other liquid, solid, gaseous or hazards substances.

Sediment: small particles of loose, unconsolidated organic and inorganic material that is broken down by processes of decay, weathering or erosion and can be subsequently transported by wind, or water.

Stormwater: Any surface flow, runoff, and drainage consisting entirely of water from any form of natural precipitation, and resulting from such precipitation.

Structural Best Management Practices: any physical means of controlling, capturing, diverting or conveying runoff or a point source for the purpose of reducing, to the maximum extent practicable, pollutants from exiting a site.

Urbanized Area: a portion of the County that has a population density of at least one thousand (1,000) people per square mile and/or meets other criteria set by the U.S. Bureau of Census in the latest Decennial Census. Or a densely settled core of census tracts and/or census blocks that have population of at least 50,000, along with adjacent territory containing non-residential urban land uses as well as territory with low population density included to link outlying densely settled territory with the densely settled core. It is a calculation used by the Bureau of the Census to determine the geographic boundaries of the most heavily developed and dense urban areas.

Waters of the U.S.: As defined in 33 CFR 328.3(a) and 40 CFR 230.3(s).



Introduction and Background

On September 30, 2016, Arizona Department of Environmental Quality (ADEQ), as part of the National Pollution Discharge Elimination System (NPDES) permit, reissued Arizona Pollutant Discharge Elimination System General Permit for Storm Water Discharges from Small Municipal Storm Sewer Systems (AZG2016-002). The goal of the permit is to reduce to the maximum extent practicable pollutants transported in untreated stormwater to the waters of the United States.

While previous issuances of the permit did not require Mohave County to apply for coverage, the latest version of the permit does. The need for coverage results from the 2010 Decennial Census. The Census determined that the unincorporated areas of Mohave County adjacent to Lake Havasu City had sufficient population density to be designated as “urbanized areas” and by extension would operate a small municipal separate storm sewer system (MS4). It is the operation of an MS4 within a designated “urbanized area” that places Mohave County under the jurisdiction of the permit.

As part of the requirements associated with operating and MS4, Mohave County must create a Stormwater Management Program. This program uses six minimum control measures to achieve the goal of the AZG2016-002. The six minimum control measures (MCM) are as follows.

1. Public Education and Outreach
2. Public Involvement and Participation
3. Illicit Discharge Detection and Elimination
4. Construction Activity Stormwater Runoff Control
5. Post-Construction Stormwater Management in New Development and Redevelopment.
- 6. Pollution Prevention/Good Housekeeping for Municipal Operations**

This document address the requirements associated with MCM 6. It is designed to provide the written procedures to systematically minimize or eliminate pollutant discharges to Mohave County’s MS4 stemming from stormwater runoff exiting municipal operations.

Urbanized Area - Geographical Limits

The eligible areas that make up the MS4 for Mohave County lie outside the incorporated limits of Lake Havasu City, within the Colorado River – Lower Gila Watershed. The MS4 area consists of portions of Sections 8, 16, 17 & 21 of Township 14N 20 W and Section 9, Township 13 North, Range 19 West of the Salt and Gila River Base and Meridian, Mohave County, Arizona. The MS4 areas are depicted on Figure 1.

Receiving Waters

The receiving waters, often referred to as waters of the United States and/or navigable water associated with Mohave County’s MS4 are Lake Havasu and the Colorado River. The receiving waters are identified on Figure 1.



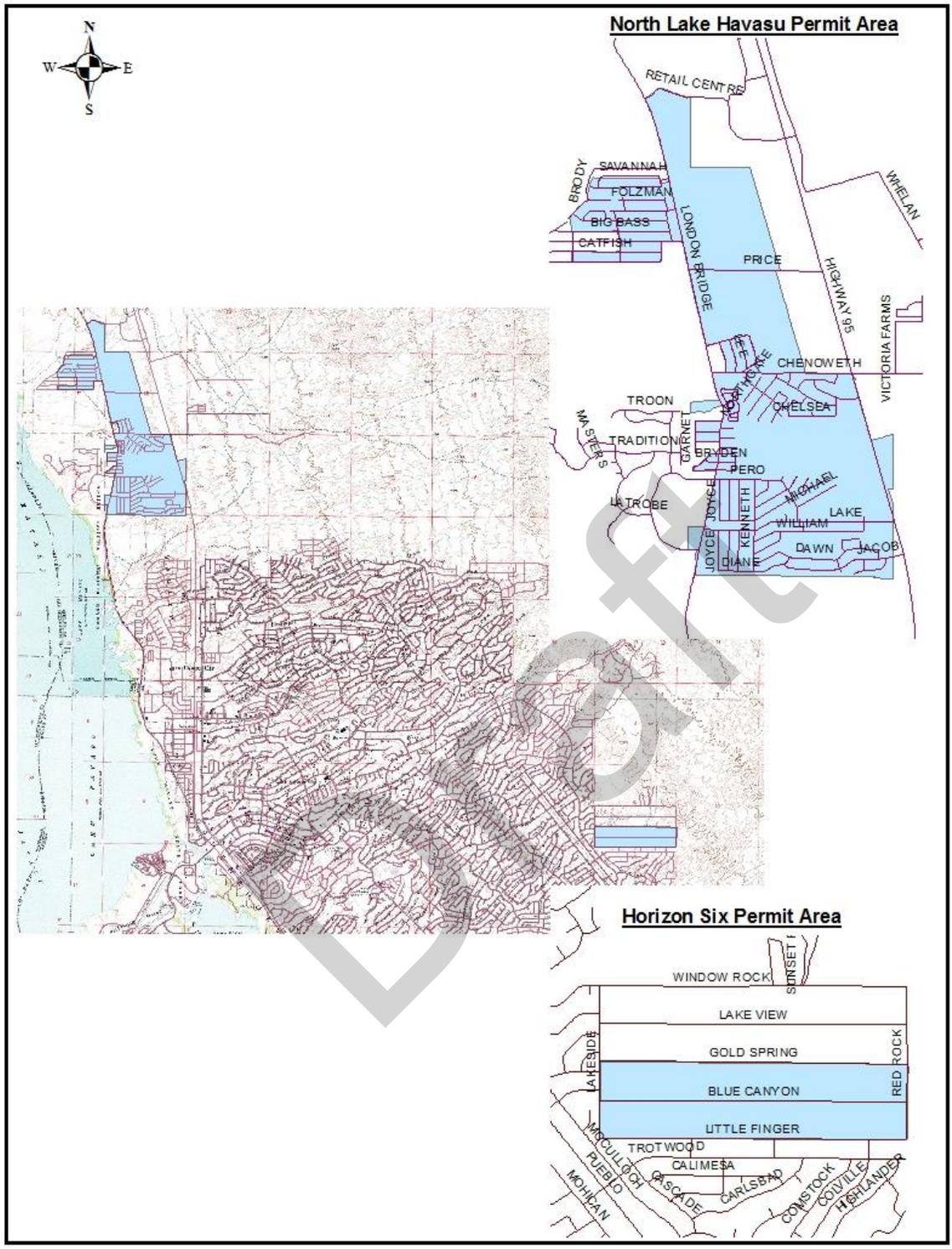


Figure 1: Permit Areas within Unincorporated Mohave County



Applicability

The Stormwater Pollution Prevention and Good House Keeping Program applies to municipal operations that are located within Mohave Counties MS4 area and are not subject to separate AZPDES permitting. This includes the facilities identified as part of the small municipal stormwater sewer system (MS4) and municipality owned or maintained buildings and/or yards. Activities would include an operation that discharges or allows for the discharge of stormwater into the MS4.

Municipal Operations that engage in activities that falls under one of the twenty-six (26) sectors identified as an industrial operation by the ADEQ will be required to obtain coverage under ADEQ's Multi-Sector General Permit (MSGP) and are not included in this program. This includes operations located anywhere in the Mohave County, including the designated MS4 area. The list of industrial operations is provided in the IDDE Program and/or on the ADEQ website. [www.azdeq.gov/MSGP Industrial/Non-Mining](http://www.azdeq.gov/MSGP_Industrial/Non-Mining).

Obligation to Comply

The Mohave County is obligated to comply with Permit No AZG2016-002 and as such is mandated under A.A.C. R-18-9-A905(A)(3) and 40 CFR 122.41. Any permit noncompliance constitutes a violation of the Clean Water Act; A.R.S. Title 49, Chapter 2, Article 3.1 and A.A.C. Title 18, Chapter 9, Article 9 and is grounds for enforcement action, permit termination, revocation and reissuance, or modification or denial of a permit renewal application.

Reporting Year

Per AZG2016-02, the report year extends from July 1 to June 30 of the previous calendar year.

Inventory

An inventory of the municipal facilities that will be covered under Pollution Prevention and Good House Keeping Plan are depicted illustrated on Figure 2a (North Lake Havasu Permit Area) and Figure 2b (Horizon Six Permit Area). Tables (Table 1 thru Table 6) have been provided in Attachment 1 to further assist in identifying the MS4 facilities represented on the maps.

The inventory of municipal operations will be reviewed and updated a minimum of once every reporting year. Changes to the inventory will be documented as part of the Annual Report.



Figure 2a - North Lake Havasu MS4 Facilities

N
1 inch = 300 feet



Figure 2a - North Lake Havasu MS4 Facilities



1 inch = 300 feet



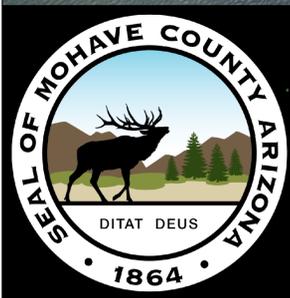
Legend

-  Spillways
-  At-Grade Crossings
-  Culverts
-  Mohave County Facilities
-  County Maintained Roads
-  North Lake Havasu Permit Area

Figure 2a - North Lake Havasu MS4 Facilities



1 inch = 300 feet



Legend

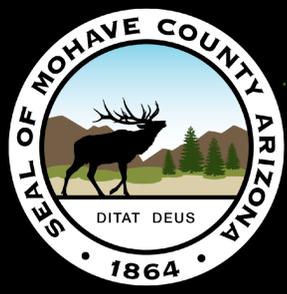
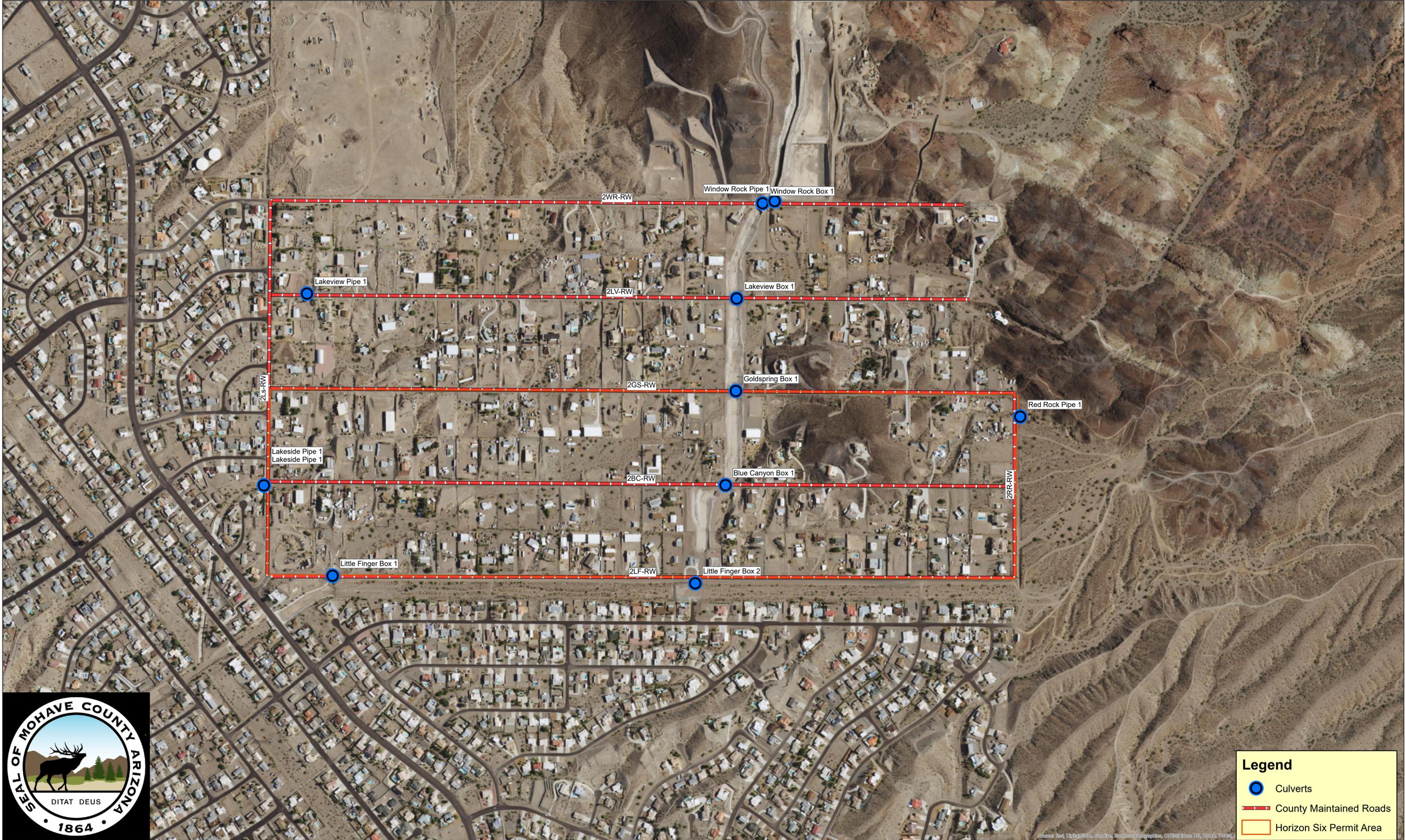
- Spillways
- At-Grade Crossings
- Catch Basins
- Storm Drain
- County Maintained Roads
- North Lake Havasu Permit Area

Figure 2b - Horizon Six MS4 Facilities

N



1 inch = 300 feet



Legend

-  Culverts
-  County Maintained Roads
-  Horizon Six Permit Area

Wet Season

The wet seasons are defined as follows:

Summer Wet Season: June 1 – October 31

Winter Wet Season: November 1 – May 31

Program Responsibilities

The responsibilities associated with the Program extend to several departments within Mohave County, including, but not limited to, the Mohave County Flood Control District, Mohave County Public Works, and Mohave County Board of Supervisors. The responsibilities assigned to these departments are itemized as follows;

Mohave County Development Services – Flood Control District:

- 1) Serve as a resource to the other departments for compliance with the MS4 Permit, the Stormwater Management Ordinance and the Pollution Prevention and Good Housekeeping Program for Municipal Operations
- 2) Assist in the prioritization of Municipal Operations
- 3) Assist in the preparation of Site-Specific Pollution Prevention and Good Housekeeping Plans for municipal operations and activities within the MS4 permit Area
- 4) Provide inspection and review services for the continued implementation of a Site-Specific Pollution Prevention and Good Housekeeping Plan
- 5) Collect, compile, and review inspection reports, and plans of actions, and follow-up inspections associated with the Site Specific Pollution Prevention and Good Housekeeping Plans
- 6) Compile and store program documentation that will included in the Annual Report
- 7) Train staff on various ordinances, programs and inspection procedures

Mohave County Public Works

- 1) Assist in the preparation of Site-Specific Pollution Prevention and Good Housekeeping Plans for municipal operations and activities within the MS4 permit area
- 2) Assist in the prioritization of Municipal Operations
- 3) Oversee the initial and day-to-day implementation of Site-Specific Pollution Prevention and Good Housekeeping Plans
- 4) Provide cleanup and maintenance services needed to ensure adherence to the Site-Specific Pollution Prevention and Good Housekeeping Plan



Mohave County Board of Supervisors:

- 1) Adopt all procedures and policies necessary for the implementation the Pollution Prevention and Good Housekeeping Program
- 2) Establish a means to continuously fund the Pollution Prevention and Good Housekeeping Program Construction and Post-Construction Stormwater Management Program

Prioritization

To kick off the Pollution Prevention and Good Housekeeping Program, an initial inspection of all the Municipal Operations identified as part of the inventory will be performed. This information will help in the prioritization process, which is essential for allocating limited resources in the most effective manner. The criteria for prioritizing sites will include, but will not be limited to the following:

- 1) Type of Operation
- 2) Proximity to the receiving water and/or the water of the US
- 3) Size of the contributing watershed
- 4) Type of development within the contributing watershed
- 5) Amount of development within the contributing watershed

How the criteria and weighted and applied to the process of ranking sites in order of priority will be a cooperative effort between Mohave County Development Services and Mohave County Public Works. When completed the prioritized list will be incorporated into the Annual Report for that reporting year. The list is to be considered dynamic and as such will be reviewed and updated as necessary as part of the annual evaluation of the Pollution Prevention and Good Housekeeping Program.

Inspections

Long-term Inspection are the key to ensuring successful implementation of Pollution Prevention and Good Housekeeping Program. To assist in this effort, the inspection schedule will separate the Municipal Operations into two categories, MS4 Conveyance Structures and Municipal Service Facilities. Each facility will be given an initial inspection to set the baseline for future efforts and help prioritize the facility. Once the initial inspection is completed the long-term inspection scheduled for each category, as provided below, will be implemented.

MS4 Conveyance Facilities

MS4 conveyance facilities will refers to the inventoried municipal facilities that capture, convey and/or discharge stormwater runoff within public right-of-way or public dedicated easements. These facilities include, publicly-maintained streets, catch basins, storm drains, culverts, channels, at-grade crossings, and spillways. This list excludes the ten identified outfalls identified which will be inspected as part of the IDDE Program. Given that discharges from the MS4 Conveyance Facilities typically cannot be equipped with structural measures to capture pollutants a more frequent inspection schedule is warranted to maintain compliance with the Permit.



Standard Inspections Schedule

- a) 1 - Summer Wet Season
- b) 1 – Winter Wet Season

High Priority/Risk Inspection Schedule:

- a) Standard Wet Season and within 7 days of a 0.25” rain fall event

Low Priority/Risk Inspection Schedule:

- a) Once per year.

Municipal Service Facilities

Municipal Service Facilities include the govern owned, operated or maintained buildings, and yards. This could include administration buildings, libraries, law enforcement facilities, equipment yards, storage yards or location that house government property or are occupied by government employees. Note this this Municipal Service Facilities that require coverage under ADEQ’s MSGP are excluded from this definition.

Standard Frequency:

- a) Yearly

Increased Frequency:

- a) Once per Wet Season

Frequency Criteria for inspections:

How often the site will be inspected will be based in part on the following;

- 1) Prioritized List
- 2) History of Non-compliance at the site
- 3) History of Illicit Discharge Events at the site

Inspections may be performed by Mohave County staff or by a qualified third party. Inspections forms for the Mohave County Inspection are provided with this document. Third Party Inspectors may use the forms created by ADEQ or their own, provided that the necessary information to ensure compliance with the Stormwater Pollution Prevent Plan is documented on the form.

Based on the results of the inspection, a follow up plan of action may be required to ensure compliance with the MS4. Plans of action could include but are not limited to

- Site cleanup, (Sediment, trash, vegetative litter removal, street sweeping, spill cleanup etc.)
- Maintenance/installation of structural and non-structural Best Management Practices (BMPs)
- Review/revision of the inspection schedule
- Removal, relocation and addition of BMPs
- Update to the Site-Specific Pollution Prevention and Good House Keeping Plan
- Staff training

Inspections and follow-up Plans of Action will be documented as part of the Annual Report.



Site-Specific Pollution Prevention and Good Housekeeping Plan

The process for developing and implementing a Site-Specific Pollution Prevent and Good Housekeeping Plan for Municipal Operations (SS-GHKP) within the MS4 will be performed by a cooperative effort between Flood Control Section of the Mohave County Development Services Department and Mohave County Public Works Department. A flow chart demonstrating this process will be provided on Figure 3.

Pollution Prevention and Good Housekeeping

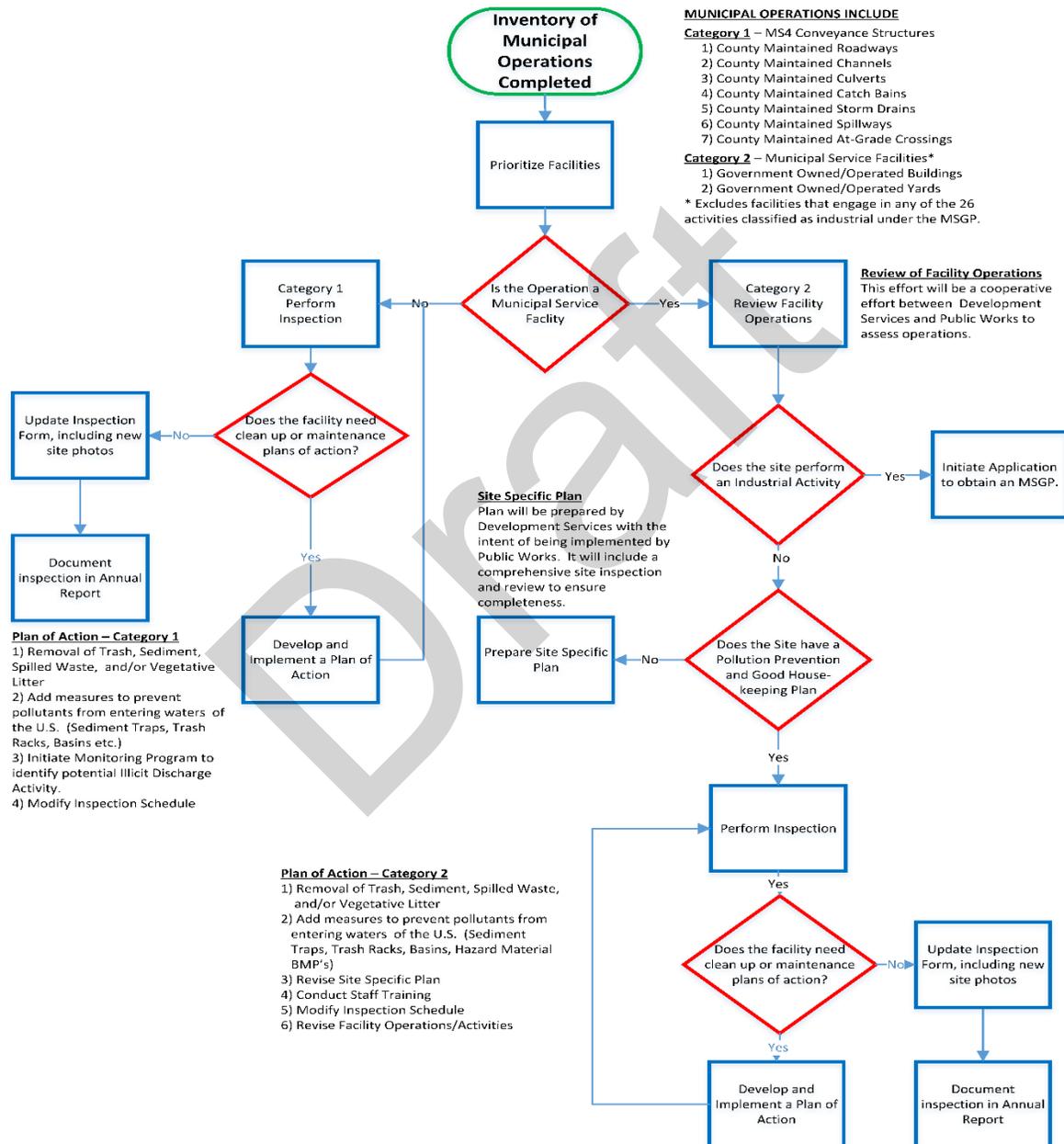


Figure 3 Pollution Prevention and Good Housekeeping Plan Process



The flow chart illustrates that a SS-GHKP will not be created for Category 1 Municipal Operations. Instead these municipal operations will use a combination of routine inspections and plans of action to prevent to the extent possible pollution from being discharged into the waters of the US.

For Category 2 Municipal Operations, a SS-GHKP will be prepared and implemented for each site. The SS-GHKP will be reviewed on an annual basis to ensure it meets the needs of the facility and reflects the operations that occur at the facility on site. Revisions will be documented in the Annual Report. A sample SS-GHKP is provide in Attachment 3.

SS-GHKP is similar to a Post-Construction Storm Water Control Plan, with the objectives being 1) keep pollutants from coming in contact with rain, 2) keep pollutants from being dumped, poured or conveyed into the MS4 system. While each site will have its own unique set of BMPs, here is a list matching municipal activities with an appropriate Best Management Practices.

<u>Activity</u>	<u>Best Management Practice</u>
Pavement Cleaning	Sweep parking lots and other paved areas to remove debris. Always sweep/blow material towards the site and never into the street. Dispose of debris into an appropriate waste disposal container for removal. Clean up spills with an appropriate absorbent material. When using water and detergent to clean surfaces that have not been in contact with hazardous materials or chemicals, use only the amount necessary to clean the surface. Never let the water exit the site. Use Green detergents whenever possible. When cleaning surfaces that have been in contact with hazardous materials or chemicals, capture the wash water and dispose of it in a drain that discharges into a sanitary sewer.
Litter Control	Provide an adequate number of trash receptacles for your customers and employees. This helps keep trash from overflowing the receptacles. Pick up litter and other wastes daily from outside areas including storm drain inlet grates.
Waste Disposal	Inspect dumpsters and other waste containers periodically. Repair or replace leaky dumpsters and containers. Cover dumpsters and other waste containers. Never dispose of waste products in storm drain inlets Recycle wastes or dispose properly.
Material Storage	Make sure all outdoor storage containers have lids, and that the lids are adequately seal. Store stockpiled materials inside a building, under a roof. If they must be stored outside, elevate above the ground and cover with a tarp when not in use.
Vehicles and Equipment	Maintain equipment and vehicles regularly. Check for and fix leaks. If a leak is discovered, place a drip pan to capture fluids until it can be repaired off-site. Remember routine repairs, vehicle cleaning or refueling on a Municipal Service Facility will invoke the need for an MSGP. When possible, store equipment behind a collection berm or in a manner that any spilled material is captured for clean up and not exit the site.
Material Stock Piles	Stockpiles of asphalt, fill, or millings, or excavated soil should be covered with a tarp or encircled by a sediment control measure (i.e. wattle, silt fence, etc.)



To assist in recognize what operations and activities can be associated with a potential pollutant, the following tables have been provided.

<u>Municipality Facility Activity</u>	<u>Potential Pollutants</u>								
	Sediment	Nutrients	Trash	Metals	Bacteria	Oil & Grease	Organics	Pesticides	Oxygen Demanding Substances
Building and Grounds Maintenance and Repair	X	X	X	X	X	X	X	X	X
Parking/Storage Area Maintenance	X	X	X	X	X	X	X		X
Waste Handling and Disposal	X	X	X	X	X	X	X	X	X
Vehicle and Equipment Fueling			X	X		X	X		
Vehicle and Equipment Maintenance and Repair				X		X	X		
Vehicle and Equipment Washing and Steam	X	X	X	X		X	X		
Outdoor Loading and Unloading of Materials	X	X	X	X		X	X	X	X
Outdoor Container Storage of Liquids		X		X		X	X	X	X
Outdoor Storage of Raw Materials	X	X	X			X	X	X	X
Outdoor Process Equipment	X		X	X		X	X		
Overwater Activities			X	X	X	X	X	X	X
Landscape Maintenance	X	X	X		X			X	X



Municipal Program	Activities	Potential Pollutants								
		Sediment	Nutrients	Trash	Metals	Bacteria	Oil & Grease	Organics	Pesticides	Oxygen Demanding Substances
Roads, Streets, and Highways Operation and Maintenance	Sweeping and Cleaning	X		X	X		X			X
	Street Repair, Maintenance, and Striping/Painting	X		X	X		X	X		
	Bridge and Structure Maintenance	X		X	X		X	X		
Plaza, Sidewalk, and Parking Lot Maintenance and Cleaning	Surface Cleaning	X	X			X	X			X
	Graffiti Cleaning	X	X		X			X		
	Sidewalk Repair	X		X						
	Controlling Litter	X		X		X	X			X
Fountains, Pools, Lakes, and Lagoons Maintenance	Fountain and Pool Draining		X					X		
	Lake and Lagoon Maintenance	X	X	X		X			X	X
Landscape Maintenance	Mowing/Trimming/Planting	X	X	X		X			X	X
	Fertilizer & Pesticide Management	X	X						X	
	Managing Landscape Wastes			X					X	X
	Erosion Control	X	X							
Drainage System Operation and Maintenance	Inspection and Cleaning of Stormwater Conveyance Structures	X	X	X		X		X		X
	Controlling Illicit Connections and Discharges	X	X	X	X	X	X	X	X	X
	Controlling Illegal Dumping	X	X	X	X	X	X	X	X	X
	Maintenance of Inlet and Outlet Structures	X		X	X		X			X
Waste Handling and Disposal	Solid Waste Collection		X	X	X	X	X	X		X
	Waste Reduction and Recycling			X	X					X
	Household Hazardous Waste Collection			X	X		X	X	X	
	Controlling Litter			X	X	X		X		X
	Controlling Illegal Dumping	X		X		X	X		X	X
Water and Sewer Utility Operation and Maintenance	Water Line Maintenance	X				X	X			
	Sanitary Sewer Maintenance	X				X	X			X
	Spill/Leak/Overflow Control, Response, and Containment	X	X			X		X		X

Source: California Stormwater BMP Handbook (<http://www.casqu.org/resources/bmp-handbooks>).



Plans of Action

Plans of Action refer to a series of tasks that are undertaken that at Municipal Operations remain compliant with the MS4 Permit. In contrast to a Site-Specific Pollution Prevention and Good Housekeeping Plan which provides a comprehensive document outline a larger scale undertaken, a Plan of Action is a documented task or list of tasks that is compiled after an inspection to address a specific issue at a given Operation. The need for the creation of a Plan of Action will be based on the results of an annual inspections. It will be attached to the Inspection Report as an open item to be address. The Plan of Action will include the following items.

- Name of Inspector
- Date and Time of the Inspection
- Type of Facility
- ID of the Facility
- Location of the Facility
- Description of Issue that Prompted the Plan of Action
- Recommended Action to be taken
- Deadline for completion of the Recommended Action
- Department responsible for completing of the Recommended Action
- Name, Title and Signature of from an authorized Department Representative certifying that the Recommended Action has been completed.

Recommended Actions could include but are not limited too

- Routine cleanup and removal of sediment, trash, vegetative litter, debris
- Emergency cleanup and removal of spilled chemicals or pollutants.*
- Placement of structural BMPs to trap pollutants (Sediment Traps, Trash Racks, Basins, Vegetative Buffer yards, fiber rolls, silt fence, etc.)
- Changes to the inspection schedule
- Monitoring Programs
- Revision to the Priority List
- Staff Training
- Revisions to a Site-Specific Pollution Prevention and Good Housekeeping Plan
- Revisions to facility operations or activities
- Addition/Revision of a non-structural BMP

* If the spilled material appears to be hazardous material, immediately stop clean up and report the spill to the fire department.

A copy of a Typical Plan of Action has been provided in Attachment 4. Using both the routine inspections and subsequent plans of actions, Mohave County will create a maintenance schedule that ensure that maintenance of its Municipal Operations is undertaken.



Public Involvement Procedures

The public will have the opportunity to comment on the Pollution Prevention and Good Housekeeping Program and Stormwater Management Program throughout the life of the AZG2016-002 using four different mediums.

- 1) Electronically:
Email: stormwater@mohavcounty.us
- 2) Phone:
Development Services Department: (928) 757-0903
- 3) Direct Mail:
Mohave County
PO Box 7000
3250 East Kino Avenue
Kingman, AZ 86402
- 4) In Person
Mohave County Development Services
3250 E. Kino Avenue
Kingman AZ 86409

Comments and responses to the comments should be documented in the Annual Report.

Annual Report

During each reporting year, the efforts of the Pollution Prevention and Good Housekeeping Program will be tracked and documented in the Annual Report. Items that will be tracked and reported upon are provided in this document and the Storm Water Management Plan.

The Annual Report shall be submitted to ADEQ no later than September 30.

Arizona Department of Environmental Quality
1110 W. Washington Street, Mail Code 5451A-1
Phoenix AZ 85007

Should electronic reporting become available, the Annual Report will be submitted using the online system.



Staff Training

Training on Pollution Prevention and Good House Keeping Program is essential. Staff training on the Pollution Prevention and Good Housekeeping Program will be conducted on an annual basis for existing employees and within the probationary period for new hires. Training will encompass topics including but not limited to;

- The Clean Water Act, NPDES, AZPDES and Storm Water Management Program
- Site Specific Pollution Prevention and Good Housekeeping Plans
- Best Management Practices (Structural and Non-Structural)
- Inspection Procedures and Frequency

The training efforts will be included in the Annual Report. The items to include are as follows;

- Topic of Training
- Summary of Training Presentation
- Date and Time that the Training was performed
- List of attendees

Record Retention

Mohave County will retain the documents associated with Pollution Prevention and Good Housekeeping Program for a period of no less than three (3) years following the expiration date of the five -year permit. The records to be retained include;

- Inventory of Municipal Operations
- Site-Specific Pollution Prevention and Good Housekeeping Plans
- Inspection Reports
- Plans of Action
- Training summaries including attendance sheets
- Re-inspection Reports
- Public comments and responses made to the Pollution Prevention and Good Housekeeping Program.
- Any revisions made to the Inventory of Municipal Operations, Inspection Schedule, Site Priority List, the Pollution Prevention and Good Housekeeping Program and/or Site-Specific Pollution Prevention and Good Housekeeping Plans.

The records may be stored either in either hardcopy and electronic copy formats.

Mohave County Development Services

3250 E. Kino Avenue
Kingman AZ,
86409

The ADEQ Director or an authorized representative may request access to the records during normal business hours.



Additional Resources

Additional information to assist in understanding and implementing the Construction General Permit, and this Program can be found at

<https://www.epa.gov/npdes/stormwater-discharges-municipal-sources#pollutionprevention>

Draft



Attachment 1 – Tables of Municipal Facilities

Draft



Table 1 - Current Municipal Buildings located in the MS4 Permit Area

Building Number	Purpose	Parcel	Address
420	SHERIFF SUB-STATION, LHC	120-05-043	3500 North Hwy 95, Lake Havasu City, AZ

Table 2 - Catch Basins located in the MS4 Permit Area

MS4 Area	Catch Basin ID	Catch Basin Description	Bounding Street
North Lake Havasu	1JR-CB1	Jacob Row CB1	Jacob Row
North Lake Havasu	1JR-CB2	Jacob Row CB2	Jacob Row
North Lake Havasu	1JR-CB3	Jacob Row CB3	Jacob Row
North Lake Havasu	1JR-CB4	Jacob Row CB4	Jacob Row

Table 3 - Storm Drains located within the MS4 Area

MS4 Area	Storm Drain ID	Storm Drain Description	Bounding Street
North Lake Havasu	1JR-SD1	Jacob Row SD1	Jacob Row
North Lake Havasu	1JR-SD2	Jacob Row SD2	Jacob Row
North Lake Havasu	1JR-SD3	Jacob Row SD3	Jacob Row
North Lake Havasu	1JR-SD4	Jacob Row SD4	Jacob Row
North Lake Havasu	1JR-SD5	Jacob Row SD5	Jacob Row

Table 4 - At-Grade Crossings located within the MS4 Area

MS4 Area	At-Grade Crossing ID	At-Grade Crossing Description	Bounding Street
North Lake Havasu	1Dn-AG1	Diane AG1	Diane Dr.
North Lake Havasu	1Lk-AG1	Lake AG1	Lake Dr.
North Lake Havasu	1Ms-AG1	Mescalero AG1	Mescalero Dr.
North Lake Havasu	1Pr-AG1	Pero AG 1	Pero Dr.
North Lake Havasu	1Pr-AG2	Pero AG 2	Pero Dr.
North Lake Havasu	1LB-AG1	London Bridge AG1	London Bridge Rd.
North Lake Havasu	1LB-AG2	London Bridge AG2	London Bridge Rd.
North Lake Havasu	1LB-AG3	London Bridge AG2	London Bridge Rd.
North Lake Havasu	1LB-AG4	London Bridge AG2	London Bridge Rd.
North Lake Havasu	1LB-AG5	London Bridge AG2	London Bridge Rd.
North Lake Havasu	1LB-AG6	London Bridge AG2	London Bridge Rd.

Table 5 - Spillways located within the MS4 Area

MS4 Area	Spillway ID	Spillway Description	Bounding Street
North Lake Havasu	1Fd-SW1	Fredrick Lane SW1	Fredrick Lane
North Lake Havasu	1Hd-SW1	Hyde SW1	Hyde Park Avenue
North Lake Havasu	1Cl-SW1	Chelsea SW1	Chelsea Street
North Lake Havasu	1RC-SW1	Retail Center SW1	Retail Center Dr
North Lake Havasu	1RC-SW2	Retail Center SW2	Retail Center Dr
North Lake Havasu	1RC-SW3	Retail Center SW3	Retail Center Dr
North Lake Havasu	1RC-SW4	Retail Center SW4	Retail Center Dr
North Lake Havasu	1RC-SW5	Retail Center SW5	Retail Center Dr
North Lake Havasu	1RC-SW6	Retail Center SW6	Retail Center Dr

Table 6 - Culverts located within the MS4 Area

MS4 Area	Culvert ID	Culvert Description	Bounding Street	Culvert Size	Culvert Material
North Lake Havasu	1NV-C1	North View Drive Box 2	North View Dr	10' x 7'	RCBC
North Lake Havasu	1RC-C1	Retail Center Pipe 1	Retail Center Dr	48"	HDPE
North Lake Havasu	1LB-C1	London Bridge Pipe 1	London Bridge Rd	18"	CMP
North Lake Havasu	1RC-C2	Retail Center Pipe 2	Retail Center Dr	30"	HDPE
North Lake Havasu	1HP-C1	Hyde Park Box 1	Hyde Park Ave	6' x 5'	RCBC
Horizon Six	2BS-C1	Blue Canyon Box 1	Blue Canyon Rd	10' x 8'	RCBC
Horizon Six	2Gs-C1	Goldspring Box 1	Goldspring Rd	10' x 8'	RCBC
Horizon Six	2Ls-C1	Lakeside Pipe 1	Lakeside Rd	48"	RCP
Horizon Six	2LV-C1	Lakeview Box 1	Lakeview Rd	8' x 8'	RCBC
Horizon Six	2LV-C2	Lakeview Pipe 1	Lakeview Rd	30"	CMP
Horizon Six	2LF-C1	Little Finger Box 1	Little Finger Rd	12' x 8'	RCBC
Horizon Six	2LF-C2	Little Finger Box 2	Little Finger Rd	8' x 5'	RCBC
Horizon Six	2RR-C1	Red Rock Pipe 1	Red Rock Rd	48"	CMP
Horizon Six	2WR-C1	Window Rock Box 1	Window Rock Rd	5' x 9'	RCBC
Horizon Six	2WR-C2	Window Rock Pipe 1	Window Rock Rd	18"	CMP

Table 7 - County Maintained Roads located within the MS4 Area

MS4 Area	Street ID	Roadwa Name	Bounding Street 1	Bounding Street 2
North Lake Havasu	1RC-RW	Retail Centre Blvd	London Bridge Rd	Lake Havasu City Line
North Lake Havasu	1LB-RW	London Bridge Rd	Retail Centre Blvd	Lake Havasu City Line
North Lake Havasu	1NV-RW	North View Drive	Brody Ln	London Bridge Rd
North Lake Havasu	1Fz-RW	Flozman Dr	West End	Park View Dr
North Lake Havasu	1HG-RW1	Havasu Garden Dr	West End	London Bridge Rd
North Lake Havasu	1HG-RW2	Havasu Garden Dr	Havasu Garden Dr	London Bridge Rd
North Lake Havasu	1Hb-RW	Hubbell Dr	West End	Park View Dr
North Lake Havasu	1BB-RW	Big Base Cv	West End	Park View Dr
North Lake Havasu	1Ts-RW	Thrasher Dr	West End	London Bridge Rd
North Lake Havasu	1Cf-RW	Catfish Cv	West End	Mountain View Dr
North Lake Havasu	1Bs-RW	Bayshore Rd	West End	Mountain View Dr
North Lake Havasu	1PV-RW	Park View Dr	North End	Thrasher Dr
North Lake Havasu	1MV-RW	Mountain View Dr	North End	Bayshore Rd
North Lake Havasu	1Cn-RW	Chenoweth Dr	London Bridge Rd	SR-95
North Lake Havasu	1Bh-RW	Buckingham Blvd	Chenoweth Dr	Stratford St
North Lake Havasu	1Kb-RW	Kingsbury Dr	Buckingham Blvd	Chenoweth Dr
North Lake Havasu	1HP-RW	Hyde Park Ave	Kingsbury Dr	SR-95
North Lake Havasu	1Cb-RW	Canterbury Rd	Mayflower St	Oxford Rd
North Lake Havasu	1Cl-RW1	Chealsea St	West End	Stratford St
North Lake Havasu	1Sf-RW	Stratford St	Hyde Park Ave	Chealsea St
North Lake Havasu	1Wm-RW	Westminster Rd	West End	Chealsea St
North Lake Havasu	1Mf-RW	Mayflower St	Westminster Rd	Canterbury Rd
North Lake Havasu	1Of-RW	Oxford Rd	Canterbury Rd	Buckingham Blvd
North Lake Havasu	1Cl-RW2	Chealsea Cir	North End	Chealsea St
North Lake Havasu	1Mz-RW	Monazite Pl	Garnet Cir	London Bridge Rd
North Lake Havasu	1Qz-RW1	Quartzite Ln	London Bridge Rd	East End
North Lake Havasu	1PI-RW1	Perlite Ln	London Bridge Rd	East End
North Lake Havasu	1Ms-RW	Mesa Drive	London Bridge Rd	East End
North Lake Havasu	1TI-RW	Touraline St	Sapphire St	Grelle St
North Lake Havasu	1Bd-RW	Bryden St	Touraline St	Grelle St
North Lake Havasu	1Sp-RW	Sapphire St	Touraline St	Grelle St

Table 7 - County Maintained Roads located within the MS4 Area

MS4 Area	Street ID	Roadwa Name	Bounding Street 1	Bounding Street 2
North Lake Havasu	1Qz-RW2	Quartzite Pl	Garnet Cir	London Bridge Rd
North Lake Havasu	1Pl-RW2	Perlite Pl	Garnet Cir	London Bridge Rd
North Lake Havasu	1Gn-RW	Garnet Cir	Monazite Pl	Perlite Pl
North Lake Havasu	1Pr-RW	Pero Dr	London Bridge Rd	Lake Drive
North Lake Havasu	1Ms-RW	Mescalero Dr	Joyce Ln	East End
North Lake Havasu	1Lk-RW1	Lake Dr	London Bridge Rd	SR-95
North Lake Havasu	1Dn-RW	Diane Dr	Joyce Ln	Jacob Row
North Lake Havasu	1JR-RW1	Jacob Row	Diane Dr	SR-95
North Lake Havasu	1Lr-RW	Lera Ln	Kenneth Lane	Pero Dr
North Lake Havasu	1Lt-RW	Latrelle Dr	Kenneth Lane	North End
North Lake Havasu	1Cr-RW	Claire Dr	Pero Dr	North End
North Lake Havasu	1At-RW	Arthur Dr	Mescalero Dr	North End
North Lake Havasu	1Wl-RW	William Dr	Kenneth Lane	Nero St
North Lake Havasu	1Dw-RW	Dawn Dr	Kenneth Lane	Jacob Row
North Lake Havasu	1Mc-RW	Michael Dr	Pero Dr	East End
North Lake Havasu	1Td-RW	Ted Ln	Kenneth Lane	William Dr
North Lake Havasu	1Gl-RW	Grelle St	Sapphite St	Tourmaline St
North Lake Havasu	1Jc-RW1	Joyce Ln	Pero Dr	Mescalero Dr
North Lake Havasu	1Jn-RW1	Jennie Ln	Pero Dr	Mescalero Dr
North Lake Havasu	1Ew-RW1	Erwin Ln	Pero Dr	Mescalero Dr
North Lake Havasu	1Kn-RW	Kenneth Ln	Pero Dr	Diane Rd
North Lake Havasu	1Jc-RW2	Joyce Ln	Lake Dr	Diane Rd
North Lake Havasu	1Jn-RW2	Jennie Ln	Lake Dr	Diane Rd
North Lake Havasu	1Ew-RW2	Erwin Ln	Lake Dr	Diane Rd
North Lake Havasu	1Lk-RW2	Lake Cir	Lake Dr	North End
North Lake Havasu	1Lk-RW3	Lake Way	Lake Dr	William Dr
North Lake Havasu	1Nr-RW	Nero St	Lake Dr	North End
North Lake Havasu	1Gg-RW	George Ln	Dawn Dr	Dawn Dr

Table 7 - County Maintained Roads located within the MS4 Area

MS4 Area	Street ID	Roadwa Name	Bounding Street 1	Bounding Street 2
North Lake Havasu	1JR-RW2	Jacob Row Ln	Dawn Dr	South End
North Lake Havasu	1Fd-RW1	Fredrick Ln	West End	Jacob Row
North Lake Havasu	1Fd-RW2	Fredrick Way	Jacob Row	Fredrick Ln
Horizon Six	2WR-RW	Window Rock Road	Lakeside Road	Red Rock Road
Horizon Six	2LV-RW	Lake View Road	Lakeside Road	Red Rock Road
Horizon Six	2GS-RW	Gold Spring Road	Lakeside Road	Red Rock Road
Horizon Six	2BC-RW	Blue Canyon Road	Lakeside Road	Red Rock Road
Horizon Six	2LF-RW	Little Finger Road	Lakeside Road	Red Rock Road
Horizon Six	2Ls-RW	Lakeside Road	Little Finger Road	Little Finger Road
Horizon Six	2RR-RW	Red Rock Road	Little Finger Road	Gold Spring Road

Table 8 - County Maintained Channels located within the MS4 Area

MS4 Area	Channel ID	Channel Description	Upstream Limit Description	Downstream Limit Description
Horizon Six	MC Channel S1	MC Channel S1	Diane Dr.	Little Finger Road
Horizon Six	MC Channel S2	MC Channel S2	Lake Dr.	Blue Canyon Road
Horizon Six	MC Channel S3	MC Channel S3	Mescalero Dr.	Gold Spring Road
Horizon Six	MC Channel S4	MC Channel S4	Pero Dr.	Lake View Road

Attachment 2 - Inspection Forms

Draft



Attachment 3 – Good Housekeeping Plan (Sample)

Draft



GOOD HOUSEKEEPING PLAN

FOR

{ FACILITY NAME }
{ FACILITY ADDRESS 1 }
{ FACILITY ADDRESS 2 }
{ CITY, STATE, ZIP }

{ Insert Date }

Location: { Insert Site PARCEL # { PARCEL NUMBER }
SECTION { _ }, TOWNSHIP { _ } SOUTH, RANGE { _ } EAST,
GILA AND SALT RIVER MERIDIAN }

Prepared by: { INSERT DEPARTMENT }
{ Insert Department Address }

Contents

<u>Section</u>	<u>Title</u>
<u>Page</u>	
A.	INTRODUCTION
1	
B.	SITE
DESCRIPTION	
2	
B.1	FACILITY
INFORMATION	2
B.2	GENERAL LOCATION
MAP	2
B.3	SITE
MAP	2
B.4	ACTIVITIES AT THE
FACILITY	2
C	CONTACT INFORMATION/RESPONSIBLE
PARTIES	
4	
C.1	FACILITY
OWNER/OPERATOR	
4	
C.2	GOOD HOUSE KEEPING/POLLUTION PREVENTION
TEAM	4
D	GOOD HOUSEKEEPING
PRACTICES	
6	
D.1	HAZARDOUS MATERIAL
PROCEDURES	6
D.2	WASTE
MANAGEMENT	9
D.3	EROSION AND SEDIMENT
CONTROLS	10
E.	INSPECTIONS
11	

- F. MAINTENANCE
13
- G. EMPLOYEE
TRAINING
14
- H. CONCLUSION
15

Tables

<u>Section</u>	<u>Title</u>
1	FACILITY INFORMATION
2	FACILITY ACTIVITIES
3	CONTACT INFORMATION
4	STORM WATER POLLUTION PREVENTION TEAM MEMBERS

A. INTRODUCTION

A Good Housekeeping Plan (GHP) defines a series of measures, procedures and processes, designed to keep an industrial facility clean and orderly, with the intent of preventing the discharge of pollutants conveyed in storm water runoff or transported directly as point source pollutants from the facility to an MS4 and/or into the waters of the United States.

This document will serve as the GHP for {Insert Facility Name} – a facility owned and operated by {Insert County}. It was developed as part of the requirements associated with being a MS4 operator (40 CFR 122.34(b)(6)) and is intended to ensure that the facility, though not permitted under Arizona Department of Environmental Quality’s (ADEQ) 2010 Non-mining Multi-Sector General Permit (2010 MSGP) remains in compliance with Phase II of the Clean Water Act.

B. SITE DESCRIPTION

B.1 FACILITY INFORMATION

**TABLE 1
FACILITY INFORMATION**

Name of Facility: _____

Street: _____

City: _____ **State:** _____ **ZIP Code:** _____

Cross-Streets: _____

Latitude:

__ ° __ ' __ " N

(degrees, minutes, seconds)

Longitude:

__ ° __ ' __ " W

(degrees, minutes, seconds)

Estimated area of industrial activity at site exposed to stormwater: _____ (acres)

B.2 GENERAL LOCATION MAP

Refer to Attachment 1 for the General Location Map.

{Create General Location Map for each site}

B.3 SITE MAP

Refer to Attachment 1 for the Site Map.

{Create Site Map for each site}

B.4 ACTIVITIES AT THE FACILITY

The activities performed at the {Insert Facility Name} or are part of the day-to-day operations of the facility have been identified and listed on Table 2. The list includes any industrial and non-industrial activities that directly or indirectly could result in a potential release of a pollutant.

Note that activities that occur on the site should be cross-referenced with those listed in 40 CFR 122.26(b)(14)(i, ii, iv-ix, xi). Activities that are listed in the 40 CFR need to be permitted under ADEQ's 2010 MSGP.

To keep the GHP current and to ensure that the measures and processes are appropriate for the activities on site, this list will be reviewed annually and updated as necessary.

An additional form that can be used to update the current site activities is provided at the end of this document (Form B.4-1).

C. CONTACT INFORMATION/RESPONSIBLE PARTIES

C.1 FACILITY OWNER/OPERATOR

The following people will serve as the primary and secondary contacts for the facility.

**TABLE 3
CONTACT INFORMATION**

Owner/Operator and or Duly Authorized Representative:
Name: _____
Address: _____
City: _____ State: _____ Zip Code: _____
Phone Number: _____ Mobile Number: _____
Email address: _____
Fax number: _____

Alternative Contact
Name: _____
Address: _____
City: _____ State: _____ Zip Code: _____
Phone Number: _____ Mobile Number: _____
Email address: _____
Fax number: _____

In case of an emergency, or where public safety, health, or damage to property may occur, call 911 prior to contacting the above personnel.

C.2 Good House Keeping/Pollution Prevention Team

{Insert Facility Name}

Good House Keeping Plan

The Good Housekeeping/Pollution Prevention Team (GHPPT) consists of one or more of individuals, who are responsible for developing, implementing, and modifying the GHP. The team will work with the facility manager to ensure that measures and processes selected as part of the GHP are not in conflict with the operations of the site, while achieving the goal of keeping pollutants from exiting the site. The individuals on the GHPPT are listed on Table 4.

TABLE 4
STORM WATER POLLUTION PREVENTION TEAM MEMBERS

Storm Water Pollution Prevention Team	
Team Leader: _____ Office Phone: _____	Title: _____ Cell Phone: _____
Responsibilities: _____ _____ _____	
Signature: _____	Date: _____
Member 2: _____ Office Phone: _____	Title: _____ Cell Phone: _____
Responsibilities: _____ _____ _____	
Signature: _____	Date: _____
Member 3: _____ Office Phone: _____	Title: _____ Cell Phone: _____
Responsibilities: _____ _____ _____	
Signature: _____	Date: _____

When a member of GHPPT is unable to fulfill their responsibilities, permanently or for an extended period, an alternative member should be selected. Form C.2-1 has been provided with this document to allow the assignment of additional or replacement team members.

D. GOOD HOUSEKEEPING PRACTICES

D.1 HAZARDOUS MATERIAL PROCEDURES

As part of the GHP, the facility will implement the following procedures to ensure the proper handling of the hazardous materials. These procedures are designed to minimize spills and reduce the chance of pollution from exiting the facility.

Identification

The GHP will inventory the chemical, hazardous materials and the other potential sources of pollutants within facility using Form D.1-1. For materials with a reportable spill quantity, the quantity should be placed on the form. It is recommended that the Material Data Safety Sheets (MDSS) be compiled and stored with the GHP for future reference.

Removal

Upon completion of the inventory, the GHPT will identify materials that can be removed from the site. Items to be removed include:

1. Old or outdated materials or chemicals, such as paints, solvents, pesticides, herbicides, etc.
2. Materials drained from vehicles or other equipment, such as oil, transmission and hydraulic fluids, fuel, etc.
3. Materials found on the site, that are not associated with activities performed at the facility, (e.g. old drums, barrels, tires, etc.) or that have been brought to the site previously.

It is also recommended that office machinery, computer equipment, old vehicles, and items that are no longer in use, be removed as part of the initial clean-up effort. Leaching of fluids and metals from these items could be a potential pollutant source.

Storage

For materials that will remain on site, the following storage procedures will be implemented:

1. Materials will be stored according to the manufacturer's instructions.
2. Materials will be stored in their original containers and appropriately labeled (e.g. used oil, spent solvents, kerosene, diesel, paint, and emulsifier).
3. Containers must close and seal.
4. Storage areas will be designated within the facility for the sole purpose of housing chemicals, hazardous materials and potential pollutants.
5. Storage areas will be located away from vehicle traffic and equipment movement corridors.
6. When possible, potential pollutant sources used in the day-to-day operation of the facility shall be stored within existing buildings or under existing permanent overhangs containing impermeable flooring (i.e. concrete, non-corrosive plastic liners,, etc.) Note: Asphalt is considered permeable and is not suitable for this application.
7. Deliveries of material will be scheduled and should contain only what will be used by the facility up until the next delivery.
8. The amount of hazardous materials or potential pollutants stored on site will be minimized.
9. When possible, hazard materials should be substituted for non-hazardous equivalents.
10. When materials are stored outdoors, containers will be elevated above ground and away from waterways or storm drain inlets.
11. If feasible, materials stored outdoors will be placed in catchment systems or surrounded protective berms.
12. Stock piled material (e.g. sand asphalt base and topsoil) will be protected by silt fences or fiber rolls.

Spill Response

In the event of a significant spill (i.e. a spill in excess of a reportable quantity), the following steps shall be taken.

1. The closest storm water outfall from the site will be barricaded using a fabricated protective barrier, sandbags, or on-site soil. (For facilities that store amounts of a given chemical above what is considered a reportable quantity, a containment barrier should be kept in close proximity of the outfall for quick emergency response.)
2. A containment barrier will be constructed immediately around the spill using sandbags (Note: In lieu of sandbags, a protective berm can be constructed using a trench-and-berm technique, in which the trench is dug and the soil removed from the trench is used to shape the containment berm.)
3. Once a spill has been contained, it will be cleaned up using dry absorbents or other approved technologies.
4. Both sorbent materials and soil encountering the pollutant will be removed from the site and properly disposed of.
5. ADEQ Emergency Response Duty Office will be notified by a the GHPPT team lead:
 - Phone Number (602) 771-2330 or (800) 234-5677

In the event of an emergency, facility personnel should call 911 or the local fire department immediately.

6. Upon completion of the spill response, the GHPPT will meet to determine what measures are necessary to prevent future spills.

For minor spills, the following procedures will be utilized

1. Spills will be cleaned up promptly, using spill kits or sorbent. The waste materials will then be properly disposed of.
2. Leaky containers will be replaced immediately. If the container cannot be replaced immediately upon discovery of a leak, the leak will be plugged the container will be placed in an impermeable containment system until a proper replacement container is obtained. Do Not Place Hazardous Materials in a non-authorized container.

Spill kits should be placed in easily accessible locations and within close proximity to hazardous materials.

D.2 WASTE MANAGEMENT

As part of the GHP, the GHPPT will take steps to ensure that wind and stormwater does not remove waste, garbage or floatable debris from the facility.

Procedures will include:

1. Placing waste containers in high-use areas or in areas where waste is generated (break areas, workstations around vehicles storage areas, etc.)
2. Ensuring that all waste containers, including dumpsters, contain lids that can be secured
3. Policing at regularly scheduled intervals (weekly, or twice or month).
4. Scheduling regular trash pickup for both waste containers (i.e. once per week) and large dumpsters (i.e. once per quarter or as-needed)
5. Training facility staff of the importance of placing waste in designated containers
6. Keeping the facility secured to prevent "wildcat dumping".
7. Additional waste containers can be added to the facility based on the recommendations from the GHPPT.

D.3 EROSION AND SEDIMENT CONTROLS

Outlet Protection

The GHPP will inspect the site and identify potential locations for the placement of erosion control measures.

1. For areas where scour is found to be present, the erosion control measures should consist of rock rip-rap splash pads designed to dissipate energy and capture sediment prior to exiting the site.
 - The splash pad will consist of a 1' layer of rock riprap ($D_{50} = 6''$), underlined with filter fabric.
 - The width of the splash pads should be twice as wide as the scour hole.
 - The length should extend 1-2 feet beyond the length of the scour hole.
2. Where a scour is not evident, fiber rolls or silt fence can be used to retain the on-site sediment while allowing the runoff to proceed downstream.
 - These measures will be installed in accordance with the manufacturer's specifications.
 - The length will be determined by the GHPPT team lead or by a qualified member of the **Insert County Department}**

Soil Stabilization

Additional control measures will be placed on the site to reduce sediment include:

1. Placing gravel to stabilize the exiting soil and limit dust in traffic areas.
2. Encouraging of reasonable vegetation growth in non-traffic areas to stabilize soil. Water harvesting areas can be considered as a means to encourage vegetation growth, as well as capture on-site sediment.

The placement of these measures will be determined by a member of the GHPPT or by a qualified member of the **Insert County Department}**

Sediment Tracking

Measures will be taken to prevent the sediment trapped in tire treads from being tracked off-site. Measures will include gravel beds or tire washes. Gravel beds should be of sufficient length and have a depth suitable to remove sediment from the tires (Typically 50' long and 3-5" deep).

E. INSPECTIONS

Storage Areas

1. Indoor material storage areas will be inspected by the GHPPT quarterly.
2. Outdoor material storage areas will be inspected by the GHPPT on a monthly basis or prior to anticipated rainfall.
3. An inventory of the chemicals located on-site will be performed annually.
 - The inventory will compare the chemicals found on the site with those listed in the GHP. The list will be modified by the GHPPT and returned the GHP for future reference.
4. Inspections will:
 - examine the integrity of the containers and the spill containment systems;
 - look for leaks and/or spilled materials;
 - verify that the contents in a container match the label;
 - verify that spill kits are stocked and easily accessible; and
 - review the overall cleanliness of the storage area.

The GHPPT may recommend the replacement of containers, cleanup of spills and improvements to the storage areas. The work may be performed as part of the maintenance requirements for the site. Should the inspection discover an immediate threat of a pollutant release, the maintenance should be started immediately.

Sediment Control Measures

1. Sediment control measures will be inspected by the GHPT quarterly or in anticipation of a rainfall event.
 - The inspections will evaluate the measure to see if it needs replacing or repair.
 - The inspections will evaluate the location of the measure to ensure it is placed at a known discharge point.
 - The inspection will check for the accumulation of sediment.
2. Adjacent pavement will be inspected twice a month or in anticipation of a rainfall event.
3. Facility discharge locations will be inspected once per year for scour, trash and sediment accumulation.

The GHPPT will make recommendations based on the inspection for the repair and replacement of the control measures, the removal of sediment from behind the control measures or from the adjacent pavement and/or the addition/relocation of control measures. The recommendations will be part of the maintenance for the facility.

Waste Management

1. Inspections of the site and trash containers will occur twice a month.
 - The inspections will look for trash in and around the site.
 - The inspections will verify that the trash cans have lids and do not leak.
 - The inspections will look for "wild cat" dumping and verify that the site is secure during off hours to prevent illegal/unauthorized dumping of garbage and debris.
2. The locations and number of trash containers will be reviewed twice a year.
 - The review will determine if the trash containers are easily accessible, and are located within areas where trash and debris is generated.
 - Trash piled around a full receptacle is an indication that additional waste containers should be added to the site.

3. The trash removal schedule will be reviewed annually.
 - The schedule posted in the GHP should reflect what is actually happening on site.
 - If dumpsters are consistently overflowing, then additional pickups should be arranged or additional dumpsters added to the facility.

The GHPPT will make recommendations for improvements to the waste management processes based on the inspections. These improvements can be performed as part of the facility maintenance.

All inspections should be documented for future reference. Form E-1 can be used to assist with documenting the inspections.

F. MAINTENANCE

As part of the GHP for the {Insert Facility Name}, a schedule to perform regular maintenance on vehicles, equipment and the measures discussed within the manual will be created. The facility operator, in conjunction with the GHPT, will create the schedule to ensure that the maintenance will not interfere with the operation of the facility. The maintenance schedule shall be incorporated into the GHP and reviewed regularly to ensure it is being followed, and reflects what is occurring at the facility. Maintenance records should be kept for future reference. Records for vehicles and equipment can be obtained from the service provider.

Note: Following the site inspections, additional maintenance may be necessary based on the recommendations of the GHPT. Recommendations for maintenance following an inspection should be initiated within 10 working days or immediately, if a delay addressing the recommendation could result in a pollutant exiting the facility.

Maintenance records should be kept for future reference. Records for vehicles and equipment can be obtained from the service provider. Form F-1 can be used to document the performed maintenance.

G. EMPLOYEE TRAINING

To elevate staff awareness regarding requirements of the GHP and the importance of managing storm water quality in accordance with the MS4 Permit and the Clean Water Act, all municipal employees shall undergo training.

Training will be held a minimum of once per year. The time and date will be announced by the Facility Manager. However, it is anticipated that annual training will occur between March 1 and March 31 of a given permit year to coincide with the training required for facilities and departments operating under other ADEQ General Permits.

Training topics may include, but are not limited to, the following:

- Importance of Water Quality Management
- Storm Water Pollution Prevention Plan
- Spill Prevention and Response
- Material Management Practices
- Good Housekeeping Practices
- Used Oil and Spent Solvent Management
- Fueling Procedures
- Proper Painting Procedures
- Used Battery Management and Disposal
- Household Chemical Pollutants
- Installation and Inspection of Structural Control Measures
- Stormwater Pollution Prevention Review procedures
- Spill Response Techniques

In addition to annual training, new employees will be trained on the practices and procedures discussed in the GHP. The training should occur within ten (10) days from the date of hire. Training sessions should occur at the facility. The sessions will be performed by the GHPPT team lead or qualified educator.

Additional training sessions will be held at the discretion of the team leader should he feel they are warranted to remain in compliance

with the MS4 Permit or to reinforce the information presented in the GHP.

Employee training will be documented and retained for future reference. An attendance form (Form G-1) has been provided for tracking employee training.

H. CONCLUSION

In 1948, the U.S dumped 2.5 billion tons per day of raw sewage into U.S. waterways. In 1969, two-thirds of the U.S. Waterways were too polluted for human use. In 2004, 44% of the streams and 64% of lakes were still too polluted for fishing and swimming. The simple measures presented in this document are designed not only to meet the requirements set forth by the EPA and ADEQ but, to address a more serious endeavor – restoring the Nation’s water systems.

FORM C.2-1

GOOD HOUSEKEEPING/POLLUTION PREVENTION TEAM

Facility Name: _____	AZMSG #: _____
Address: _____	Phone Number: _____
City: _____	State: _____ Zip Code: _____
Team Leader: _____ Title: _____	
Office Phone: _____	Cell Phone: _____
Responsibilities _____	

Signature: _____	Date: _____
Member 2: _____	Title: _____
Office Phone _____	Cell Phone: _____
Responsibilities _____	

Signature: _____	Date: _____
Member 3: _____	Title: _____
Office Phone _____	Cell Phone: _____
Responsibilities _____	

Signature: _____	Date: _____
Member 4: _____	Title: _____
Office Phone _____	Cell Phone: _____
Responsibilities _____	

Signature: _____	Date: _____

D.1-1
ON-SITE CHEMICALS

Chemical/ Pollutant ¹	Packaging/ Stored Location ²	Storage Date ³	Removal Date ⁴	Reportable Quantity	Verified by (Print Name/Signature/Date) ⁵
					<hr/> Printed Name: <hr/> Date:
					<hr/> Printed Name: <hr/> Date:
					<hr/> Printed Name: <hr/> Date:
					<hr/> Printed Name: <hr/> Date:
					<hr/> Printed Name: <hr/> Date:
					<hr/> Printed Name: <hr/> Date:

1. Insert names of chemicals or pollutants that are located on site. (Hydraulic Fluid)
2. Indicate where it is stored (e.g. Drum/Outside Shed #2)
3. Provide a date when the material was brought onto the site.
4. If no longer on site, provide a date when the material was permanently removed.
5. Printed name of the person maintaining the list and date it was updated.

Storage Areas

Name/Description of Storage Area	Location of Storage Area	Are any containers leaking or in need of replacement?	Is there any spilled material in the storage area?	Recommended Corrective Actions (Identify any recommendations for the storage site including replacement of containers or changes to reduce spills.)
	<input type="checkbox"/> Indoor <input type="checkbox"/> Outdoor	<input type="checkbox"/> No <input type="checkbox"/> Yes	<input type="checkbox"/> No <input type="checkbox"/> Yes	
	<input type="checkbox"/> Indoor <input type="checkbox"/> Outdoor	<input type="checkbox"/> No <input type="checkbox"/> Yes	<input type="checkbox"/> No <input type="checkbox"/> Yes	
	<input type="checkbox"/> Indoor <input type="checkbox"/> Outdoor	<input type="checkbox"/> No <input type="checkbox"/> Yes	<input type="checkbox"/> No <input type="checkbox"/> Yes	
	<input type="checkbox"/> Indoor <input type="checkbox"/> Outdoor	<input type="checkbox"/> No <input type="checkbox"/> Yes	<input type="checkbox"/> No <input type="checkbox"/> Yes	
	<input type="checkbox"/> Indoor <input type="checkbox"/> Outdoor	<input type="checkbox"/> No <input type="checkbox"/> Yes	<input type="checkbox"/> No <input type="checkbox"/> Yes	
	<input type="checkbox"/> Indoor <input type="checkbox"/> Outdoor	<input type="checkbox"/> No <input type="checkbox"/> Yes	<input type="checkbox"/> No <input type="checkbox"/> Yes	
	<input type="checkbox"/> Indoor <input type="checkbox"/> Outdoor	<input type="checkbox"/> No <input type="checkbox"/> Yes	<input type="checkbox"/> No <input type="checkbox"/> Yes	
	<input type="checkbox"/> Indoor <input type="checkbox"/> Outdoor	<input type="checkbox"/> No <input type="checkbox"/> Yes	<input type="checkbox"/> No <input type="checkbox"/> Yes	
	<input type="checkbox"/> Indoor <input type="checkbox"/> Outdoor	<input type="checkbox"/> No <input type="checkbox"/> Yes	<input type="checkbox"/> No <input type="checkbox"/> Yes	
	<input type="checkbox"/> Indoor <input type="checkbox"/> Outdoor	<input type="checkbox"/> No <input type="checkbox"/> Yes	<input type="checkbox"/> No <input type="checkbox"/> Yes	

Waste Management

Name/Description of Waste Container	Location of container?	Is it container need replacing?	Is there any trash around the container?	Recommended Corrective Actions (Identify any recommendations for the storage site including replacement of containers adding new containers or moving containers to better serve the facility.)
	<input type="checkbox"/> Indoor <input type="checkbox"/> Outdoor	<input type="checkbox"/> No <input type="checkbox"/> Yes	<input type="checkbox"/> No <input type="checkbox"/> Yes	
	<input type="checkbox"/> Indoor <input type="checkbox"/> Outdoor	<input type="checkbox"/> No <input type="checkbox"/> Yes	<input type="checkbox"/> No <input type="checkbox"/> Yes	
	<input type="checkbox"/> Indoor <input type="checkbox"/> Outdoor	<input type="checkbox"/> No <input type="checkbox"/> Yes	<input type="checkbox"/> No <input type="checkbox"/> Yes	
	<input type="checkbox"/> Indoor <input type="checkbox"/> Outdoor	<input type="checkbox"/> No <input type="checkbox"/> Yes	<input type="checkbox"/> No <input type="checkbox"/> Yes	
	<input type="checkbox"/> Indoor <input type="checkbox"/> Outdoor	<input type="checkbox"/> No <input type="checkbox"/> Yes	<input type="checkbox"/> No <input type="checkbox"/> Yes	
	<input type="checkbox"/> Indoor <input type="checkbox"/> Outdoor	<input type="checkbox"/> No <input type="checkbox"/> Yes	<input type="checkbox"/> No <input type="checkbox"/> Yes	
	<input type="checkbox"/> Indoor <input type="checkbox"/> Outdoor	<input type="checkbox"/> No <input type="checkbox"/> Yes	<input type="checkbox"/> No <input type="checkbox"/> Yes	
	<input type="checkbox"/> Indoor <input type="checkbox"/> Outdoor	<input type="checkbox"/> No <input type="checkbox"/> Yes	<input type="checkbox"/> No <input type="checkbox"/> Yes	
	<input type="checkbox"/> Indoor <input type="checkbox"/> Outdoor	<input type="checkbox"/> No <input type="checkbox"/> Yes	<input type="checkbox"/> No <input type="checkbox"/> Yes	
	<input type="checkbox"/> Indoor <input type="checkbox"/> Outdoor	<input type="checkbox"/> No <input type="checkbox"/> Yes	<input type="checkbox"/> No <input type="checkbox"/> Yes	

Observations

Describe the facility's overall condition where trash and debris is concerned. Is the site well-kept or in need of a being cleaned up?

Other Recommendations

Describe any recommendations you feel are necessary to improve the Good Housekeeping Plan:

FORM F-1 **MAINTENANCE RECORD FORM**

Facility Name: _____	AZMSG #: _____
Address: _____	Phone Number: _____
City: _____ State: _____	Zip Code: _____

Structural Control Measure

- Number the structural control measures must match the number identified on the Site Plan and the Routine Inspection Form for consistency.

No.	Structural Control Measure:	Maintenance Date:	Reason for Action:	Maintenance Activity: (Briefly describe what action was performed)
			<input type="checkbox"/> Routine Maintenance <input type="checkbox"/> Problem Discovery	
			<input type="checkbox"/> Routine Maintenance <input type="checkbox"/> Problem Discovery	
			<input type="checkbox"/> Routine Maintenance <input type="checkbox"/> Problem Discovery	
			<input type="checkbox"/> Routine Maintenance <input type="checkbox"/> Problem Discovery	
			<input type="checkbox"/> Routine Maintenance <input type="checkbox"/> Problem Discovery	
			<input type="checkbox"/> Routine Maintenance <input type="checkbox"/> Problem Discovery	

Storage and Waste Disposal Areas

No.	Storage & Disposal Areas/Container	Maintenance Date	Reason for Action:	Maintenance Activity: (Briefly describe what action was performed)
			<input type="checkbox"/> Routine Maintenance <input type="checkbox"/> Problem Discovery	
			<input type="checkbox"/> Routine Maintenance <input type="checkbox"/> Problem Discovery	
			<input type="checkbox"/> Routine Maintenance <input type="checkbox"/> Problem Discovery	
			<input type="checkbox"/> Routine Maintenance <input type="checkbox"/> Problem Discovery	
			<input type="checkbox"/> Routine Maintenance <input type="checkbox"/> Problem Discovery	
			<input type="checkbox"/> Routine Maintenance <input type="checkbox"/> Problem Discovery	

EMPLOYEE TRAINING FORM

Facility Name: _____		
Address: _____	Phone Number: _____	
City: _____	State: _____ Zip Code: _____	
Training Date: _____ Trainer: _____		
Title of Training: _____		
Location of Training: _____		
Description of Training: _____		
	Employee(s) Trained:	Employee Signature:
1		
2		
3		
4		
5		
6		
7		
8		
9		
10		
11		
12		
13		
14		
15		
Trainer Name: _____		Signature: _____

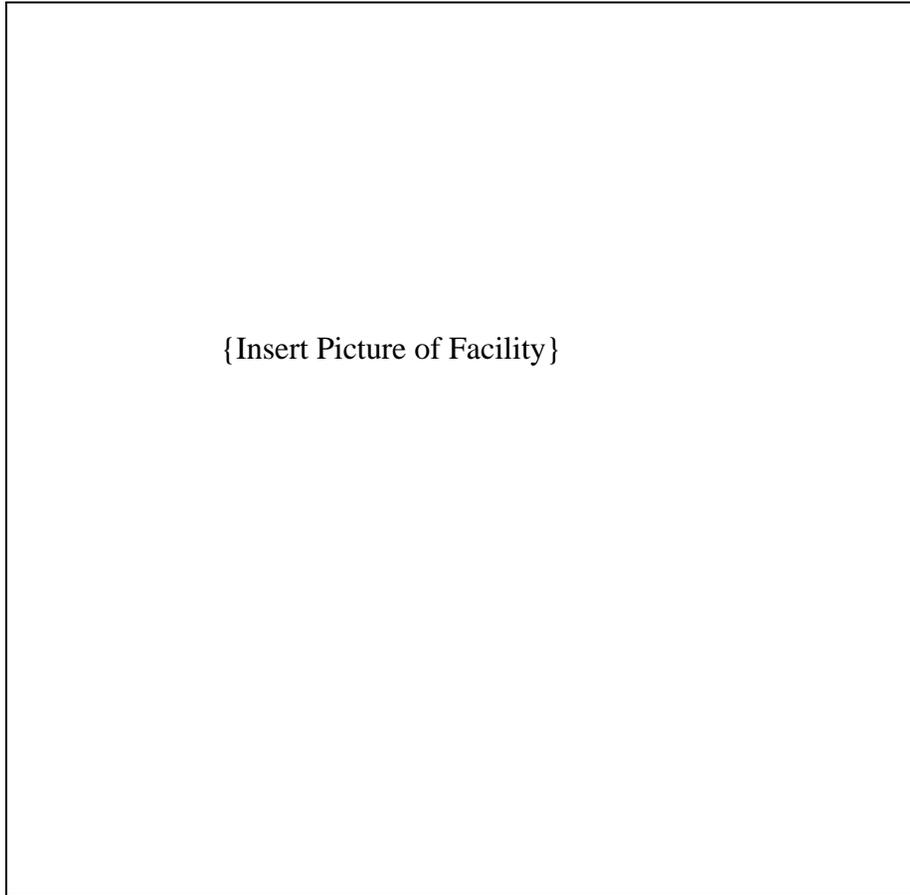
Note: Training records need to be retained as part of the SWPPP.

Attachment 4 – Plan of Action Example Form

Draft



POLLUTION PREVENTION AND GOOD HOUSEKEEPING PROGRAM
PLAN OF ACTION



{Insert Picture of Facility}

MUNICIPAL FACILITY PHOTO

Section 1

INSPECTION TRACKING INFORMATION	
Outfall ID: _____	Inspector Name: _____
Inspection Date: _____	Inspector Phone Number: _____

Section 2

FACILITY INFORMATION	
Facility ID: _____	_____
Permit Area	<input type="checkbox"/> North Lake Havasu <input type="checkbox"/> Horizon Six
Closest Cross-Streets: _____	
FACILITY TYPE	
CATEGORY 1	CATEGORY 2
<input type="checkbox"/> At-grade Crossing <input type="checkbox"/> Culvert: <input type="checkbox"/> Spillway <input type="checkbox"/> Channel: <input type="checkbox"/> Street: <input type="checkbox"/> Storm Drain: <input type="checkbox"/> Catch Basin: <input type="checkbox"/> Channel:	Building Name: _____ Facility Purpose: _____ Facility Manager: _____

POLLUTION PREVENTION AND GOOD HOUSEKEEPING PROGRAM
PLAN OF ACTION



Inspection Concern - Photo 1

{ Insert Photo of Issue that prompted Plan of Action }

Section 3

RECOMMENDED MITIGATION PLAN	
DESCRIPTION OF ACTION: _____ _____ _____ _____	
Date Started: _____	Date Completed: _____
DEPARTMENTS INVOLVED (Check all that apply)	DEPARTMENT CONTACT
<input type="checkbox"/> Development Services	Name: _____ Phone: _____
<input type="checkbox"/> Flood Control District:	Name: _____ Phone: _____
<input type="checkbox"/> Public Works	Name: _____ Phone: _____
<input type="checkbox"/> Other: _____	Name: _____ Phone: _____

SECTION 4

CERTIFICATION

"I certify under penalty of law that actions listed as part of his document were completed under my direction or supervision in accordance with a system designed to assure that qualified personnel properly undertake the tasks presented in order to assure that Mohave County is in compliance with the Arizona Pollutant Discharge Elimination System General Permit for Stormwater Discharges from Small Municipal Separate Storm Sewer Systems to Waters of the United States (AZG2016-002) Based on my inquiry of the person or persons who manage this system, or those persons directly responsible for completing the tasks associated with this Plan of Action, I believe the tasks were completed as prescribed. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Printed Name: _____	Title: _____	Phone: _____
Signature: _____		Date: _____