WV State University

Pollution Prevention Plan/

Good Housekeeping Guidance Document

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POLLUTION PREVENTION PLAN

West Virginia State University conducts five activities that can pose a threat to water quality if practices and procedures are not in place to prevent pollutants from entering the MS4. These activities include landscaping and ground maintenance; application of pesticides, pesticides, and herbicides; vehicle wash areas; salt and other deicing materials; and vehicle maintenance. Ultimately it is the goal of West Virginia State University to conduct activities that remove pollutants from the MS4 when performed properly, such as building wash downs and storm drain system cleaning. Finally, West Virginia State University's facilities can be sources of stormwater pollutants if stormwater control measures (SCMs) are not in place to contain spills, manage trash, and handle non-stormwater discharges.

West Virginia State University's MS4 permit requires staff training on ways to protect stormwater, particularly when maintaining MS4 infrastructure and performing daily activities, such as campus and open space maintenance, fleet and building maintenance, new construction and land disturbances, and stormwater system maintenance. This primarily includes:

- Developing inspection and maintenance procedures and schedules for SCMs,
- Implementing SCMs for infrastructure, maintenance areas, storage yards, salt storage areas, and waste transfer stations,
- Establishing procedures for properly disposing of pollutants removed from the MS4

West Virginia State University has an annual training program for all staff involved in activities that could discharge pollutants to the MS4. West Virginia State University also developed standard operating procedures that incorporate SCMs for common activities, garnering input from both managers and field crews to determine the most appropriate and effective SCMs for each situation. Standard operating procedures and spill prevention and control plans also had to be developed for all facilities where activities occur that can generate stormwater pollutants.

The standard operating procedures for each of the five activities performed on campus are explained in full detail in this Pollution Prevention Plan. This document has been successfully completed by all responsible departments. Educating the staff about the impacts stormwater has on the Kanawha River is the first step.

Standard Operating
Procedures for:

STORAGE AND APPLICATION OF HERBICIDES/PESTICIDES

Purpose of SOP: To protect stormwater by properly storing and applying pesticides and herbicides.

The Research station is the location for the herbicide/pesticide storage. It is stored in a separate building without floor drains in explosion and water proof containers. Typically no more than 15 gallons of chemicals are stored at any given time.

Always:

- Store herbicides/pesticides according to manufacturer's specifications and applicable regulations.
- Clearly label secondary containers.
- Properly dispose of pesticides and herbicides according to manufacturer's specifications and applicable regulations.
- Regularly inspect pesticide and herbicide storage areas for leaks or spills.
- Clean up spills and leaks of herbicides and pesticides to prevent the chemicals from reaching the storm drain system.

Whenever Possible:

- Order pesticides and herbicides for delivery as close to time of use as possible to reduce the amount stored at the facility.
- Order only the amount needed to minimize excess or obsolete materials requiring storage and disposal.
- Use all pesticides and herbicides appropriately to minimize the amount of chemicals requiring disposal.
- Apply pesticides during the period of maximum plant uptake (spring and fall).

Never:

- Never dispose of pesticides or herbicides in a storm drain.
- Never leave unlabeled or unstable chemicals in uncontrolled locations.

Standard Operating
Procedures for:

GROUND MAINTENANCE

Purpose of SOP: To protect stormwater by using proper mowing and ground maintenance techniques because storm drain water is part of the combined sewer system in the Institute area and could potentially discharge these untreated pollutants into the Kanawha River.

West Virginia State University's Physical Facilities contractors perform ground maintenance on campus. The grass clippings are mulched in place. Lawn mowers, weed eaters, blowers, etc. are fueled, maintained and stored within the McNeil Maintenance Building on concrete floors.

Always:

- Mow only as low as needed for the areas intended use.
- Water at appropriate times.
- Manage leaves, clippings, and compost so that runoff does not enter the storm drain system.

Whenever Possible:

- Keep mower blades sharpened to avoid damaging grass leaf tissue.
- Sweep/blow lawn clippings and debris off of sidewalks and roadways back onto the lawn instead of using water.
- Mulch grass clippings using a mulching mower.
- Fill gas tanks in a controlled location (i.e. area with no floor drains).

Never:

- If irrigation is necessary, then never irrigate based on timers/schedules instead of monitoring for moisture content.
- Never dump gas, wastes or contaminated water down storm drains.
- Never refuel or change the mower oil near storm drains.

Standard Operating
Procedures for:

Vehicle and Equipment Washing

Purpose of SOP: To protect stormwater by using proper vehicle and equipment washing techniques because storm drain water is part of the combined sewer system in the Institute area and could potentially discharge these untreated pollutants into the Kanawha River.

Vehicles are washed at the Butler Building avoiding discharge into any storm drains near that location.

Always:

- Perform fewer than 3 wash events per week.
- Wash on a non-rainfall day
- Use a drain guard to catch sediments that might enter the storm drains as a result of the washing.

Whenever Possible:

- Use a commercial car wash for light duty vehicles.
- Minimize water and soap use when washing or rinsing.

Never:

- Never wash vehicles over a storm drain.

Standard Operating
Procedures for:

Deicing Material Storage and Application

Purpose of SOP: To protect stormwater by using proper deicing material storage and application techniques because storm drain water is part of the combined sewer system in the Institute area and could potentially discharge these untreated pollutants into the Kanawha River.

Salt and other deicing materials are stored under the roof on concrete floors at the Salt Shed Building, therefore, the likelihood of discharging contaminated stormwater is very low.

Pre-bagged calcium chloride is used for deicing.

Always:

- Locate the deicing material on flat, impervious surfaces that are easily protected.
- Ensure deicing material is under shelter from the elements of weather.
- Use the minimum amount of deicing material needed to get the desired results.
- Ensure the deicing material is protected from the weather.

Whenever Possible:

- Park equipment in covered areas so it does not result in runoff into storm drains.
- Locate deicing material away from flood areas and stormwater runoff.
- Train drivers to improve application techniques and reduce losses.
- Remove snow manually from sidewalks.

Never:

- Never dispose of wash water from deicing equipment into the storm drain system.

Standard Operating Procedures for:

Vehicle Maintenance

Purpose of SOP: To protect stormwater by using proper vehicle maintenance procedures because storm drain water is part of the combined sewer system in the Institute area and could potentially discharge these untreated pollutants into the Kanawha River.

The vehicle maintenance garage is located at the Butler Building on the Southeast side of campus. The vehicle maintenance garage does not have floor drains near the bays in which maintenance is performed, therefore, the likelihood of discharging contaminated runoff or stormwater is very low.

Always:

- Apply absorbents on all spills from vehicle maintenance.
- Dispose of used oil into the recycling barrels for pick-up.
- Dispose of used antifreeze into the recycling barrels for pick-up.
- Inspect parking areas for stains/leaks on a regular basis.

Whenever Possible:

- Maintain vehicles to prevent leaks.

Never:

- Store leaking vehicles over a storm drain.

Trash Management

Purpose of SOP: To protect stormwater by using proper trash management procedures because storm drain water is part of the combined sewer system in the Institute area and could potentially discharge untreated pollutants into the Kanawha River.

Always:

- Cover trash bins to keep trash and leachate in and wind and rain out.

Whenever Possible:

- Store trash containers beneath a covered structure or inside to prevent contact with stormwater.
- Install berms, curbing or vegetation strips around storage areas to control water entering/leaving storage areas.
- Place dumpsters on a flat, concrete surface that does not slope or drain directly into the storm drain system.
- Locate dumpsters and trash cans in convenient, easily observable areas.
- Provide properly-labeled recycling bins to reduce the amount of trash disposed of.
- Inspect trash bins for leaks regularly, and have repairs made immediately by the responsible party.
- Keep bins free of improperly discarded trash.
- Provide training to employees to prevent improper disposal of general trash.
- Minimize waste by purchasing recyclable products that have minimal packaging.
- Request/use dumpsters without drain holes.

Never:

- Place hazardous wastes in a dumpster or trash bin.
- Place gasoline-contaminated wastes in a trash bin.
- Place oil-contaminated materials that release free draining oil into a trash bin.

Building Exterior Cleaning

Purpose of SOP: To protect stormwater by using proper exterior building cleaning procedures because storm drain water is part of the combined sewer system in the Institute area and could potentially discharge untreated pollutants into the Kanawha River.

Always:

- Use minimal water.
- Wash on dry days.
- Use storm drain inlet protection devices (drain covers, wattles, booms, berms).

Whenever Possible:

- Use a sanitary sewer for discharge.
- Use a wet vacuum or holding tank.
- Have a spill kit and equipment for dry clean up.
- Direct wash water to nearby landscaping or vegetated area.

Never:

- Allow a visible sheen to discharge.
- Use any type of detergents (if not biodegradable).

Chemical Storage

Purpose of SOP: To protect stormwater by using proper chemical storage procedures because storm drain water is part of the combined sewer system in the Institute area and could potentially discharge untreated pollutants into the Kanawha River.

Always:

- Store chemicals away from high traffic areas, posted with appropriate signage.
- Store chemicals according to manufacturer's specifications in approved containers and conditions.
- Be prepared for possible spills by having a spill kit nearby.
- Store incompatible hazardous materials in separate areas.
- Inspect storage areas for leaks or drips frequently.
- Conduct annual employee training to reinforce proper storage techniques for chemical products.

Whenever Possible:

- Store chemicals inside or under cover.
- Provide secondary containment for interior storage.
- Cover transfer areas.

Never:

- Store bulk chemicals near a storm drain.

Sediment Control to Prevent Erosion

The purpose of this standard operation procedure is to protect stormwater by using proper erosion and sediment control procedures because storm drain water is part of the system that could potentially discharge untreated pollutants into the Kanawha River.

Always:

- Use erosion control techniques or devices to stabilize disturbed areas.
- Use effective planning.
- Inspect erosion control devices on a frequent basis.
- Keep land disturbances to a minimum.
- Install erosion control devices properly'
- Remove sediment accumulated during construction from permanent BMPs once construction is complete.
- Minimize slope lengths to reduce the velocity of stormwater runoff.
- Prevent erosion by covering bare soil and stockpiles with mulch or other cover.
- Protect existing stormwater structures from sediment by using temporary sediment traps, silt fences, hat bales or perforated risers.

Whenever Possible:

- Install erosion control blankets when seeding drainage ways.
- Establish vegetative cover with good root systems prior to freeze/thaw cycles.

Never:

- Divert runoff into sensitive areas.
- Remove temporary measures before construction is complete.

Spill Response Plan

Purpose of SOP: To protect stormwater by using proper spill response procedures because storm drain water is part of the combined sewer system in the Institute area and could potentially discharge untreated pollutants into the Kanawha River.

Always:

- Immediately report all spills to **WVSU Health and Safety at (304) 204-4060 or (304) 688-8302 or Joseph.davenport@wvstateu.edu**.

- Be prepared to provide the following information:
    - Chemical Name,
    - Quantity Spilled,
    - Exact Location of the Spill
- Follow the WVSU IDDE Program to detect and eliminate spills that could affect the stormwater system.
- All spills with the potential to reach the Stormwater system must be immediately reporedt to WVDEP's Stormwater Team's Emergency Number 1-800-642-3074.