

POLLUTION PREVENTION AND GOOD HOUSEKEEPING FOR MUNICIPAL OPERATIONS

Pollution Prevention and Good Housekeeping for Municipal Operations Background

LOCAL GOVERNMENTS shall implement an operation and maintenance program that includes a training component and has the ultimate goal of preventing or reducing pollutant runoff from municipal operations.

LOCAL GOVERNMENTS shall provide employee training to prevent and reduce storm water pollution from activities such as park and open space maintenance, fleet and building maintenance, new construction and land disturbances, and storm water system maintenance.

LOCAL GOVERNMENTS shall maintain a current inventory of facilities and operations owned and operated by the permittee with the potential for generating polluted stormwater runoff.

LOCAL GOVERNMENTS shall maintain and implement, evaluate annually and update as necessary an Operation and Maintenance (O&M) program for municipally owned and operated facilities with the potential for generating polluted stormwater runoff. The O&M program shall specify the frequency of inspections and routine maintenance requirements.

LOCAL GOVERNMENTS shall have written spill response procedures for municipally owned or operated facilities.

LOCAL GOVERNMENTS shall evaluate existing and new BMPs annually that reduce polluted stormwater runoff from municipally owned streets, roads, and public parking lots within their corporate limits. The permittee must evaluate the effectiveness of these BMPs based on cost and the estimated quantity of pollutants removed.

LOCAL GOVERNMENTS shall maintain and implement an O&M program for the stormwater sewer system including catch basins and conveyance systems that it owns and maintains.

LOCAL GOVERNMENTS shall maintain a current inventory of municipally owned or operated structural stormwater controls installed for compliance with the permittee's post-construction ordinance.

LOCAL GOVERNMENTS shall maintain and implement an O&M program for municipally owned or maintained structural stormwater controls installed for compliance with the permittee's post-construction ordinance.

LOCAL GOVERNMENTS shall specify the frequency of inspections and routine maintenance requirements for structural stormwater controls.

LOCAL GOVERNMENTS shall inspect and maintain municipally owned or maintained structural stormwater controls in accordance with the schedule developed by permittee. The permittee shall document inspections and maintenance of all municipally owned or maintained structural stormwater controls.

LOCAL GOVERNMENTS shall ensure municipal employees are properly trained and all permits, certifications, and other measures for pesticide applicators are followed.

POLLUTION PREVENTION AND GOOD HOUSEKEEPING FOR MUNICIPAL OPERATIONS

LOCAL GOVERNMENTS shall describe and implement measures to prevent or minimize pollution of stormwater runoff from all areas used for vehicle and equipment cleaning.

Note for each question; answer Yes or No, and enter a comment and/or a recommendation if appropriate. Comments are normally associated with positive findings where recommendations are normally associated when either responding “no” or where there are specific recommendations to strengthen the program.

DRAFT

POLLUTION PREVENTION AND GOOD HOUSEKEEPING FOR MUNICIPAL OPERATIONS

NPDES PERMIT – PART II SECTION G (2)(a)

BMP: Inventory of municipally owned or operated facilities

Measureable Goal: The LOCAL GOVERNMENT shall maintain a current inventory of facilities and operations owned and operated by the LOCAL GOVERNMENT with the potential for generating polluted stormwater runoff.

MEP

1. Does the LOCAL GOVERNMENT maintain a current inventory of facilities owned and operated by the LOCAL GOVERNMENT with the potential for generating polluted stormwater runoff?
2. Does the LOCAL GOVERNMENT maintain a current inventory of operations owned and operated by the LOCAL GOVERNMENT with the potential for generating polluted stormwater runoff?

Sustainability

3. For facilities:
 - a. Have all municipally owned facilities that could generate polluted runoff been identified? (including facilities operated by contractors)
 - b. Has each identified facility been evaluated for its potential to generate polluted runoff?
 - c. Have the identified facilities been prioritized for relative potential to generate polluted runoff? (e.g., high, medium, low potential)
 - d. Are all priority facilities shown on a list and on a map prepared and maintained for this purpose? (the inventory of facilities)
 - e. Is the facilities inventory map in GIS or other relational electronic format?
 - f. Has a responsible contact person and contact information been identified for each selected facility? (both LOCAL GOVERNMENT and contractor contacts, if applicable)
 - g. Has a frequency for re-evaluating each facility's potential for generating polluted runoff been established? (e.g., new facilities, decommissioning of facilities, modifications to facilities, changes in facilities practices)
 - h. Is each facility's potential for generating polluted runoff re-evaluated on a regular basis and the inventory updated accordingly? Are updates per the selected frequency?
4. For operations:
 - a. Have all operations that plausibly could generate polluted runoff been identified? (including contracted operations)
 - b. Has each identified operation been evaluated for its potential to generate polluted runoff?
 - c. Have identified operations been prioritized for relative potential to generate polluted runoff? (e.g., high, medium, low potential)
 - d. Are all selected operations shown on a list prepared and maintained for this purpose? (the inventory of operations)
 - e. Has a responsible contact person and contact information been identified for each selected operation? (both LOCAL GOVERNMENT and contractor contacts, if applicable)
 - f. Has a frequency for re-evaluating its operations' potential for generating polluted runoff been established? (e.g., new operations, termination of operations, modifications to operations, changes in operations' practices)

POLLUTION PREVENTION AND GOOD HOUSEKEEPING FOR MUNICIPAL OPERATIONS

Is each operations potential for generating polluted runoff re-evaluated on a regular basis and the inventory updated accordingly? Are updates per the selected frequency?

DRAFT

POLLUTION PREVENTION AND GOOD HOUSEKEEPING FOR MUNICIPAL OPERATIONS

NPDES PERMIT – PART II SECTION G (2)(b)

BMP: Operation and Maintenance (O&M) for municipally owned or operated facilities

Measureable Goal: The LOCAL GOVERNMENT shall maintain and implement, evaluate annually and update as necessary an Operation and Maintenance (O&M) program for municipally owned and operated facilities with the potential for generating polluted stormwater runoff. The O&M program shall specify the frequency of inspections and routine maintenance requirements.

MEP

1. Does the LOCAL GOVERNMENT maintain and implement, evaluate annually and update as necessary an Operation and Maintenance (O&M) program for municipally owned and operated facilities with the potential for generating polluted stormwater runoff?
2. Does the LOCAL GOVERNMENT O&M program specify the frequency of inspections and routine maintenance requirements?

Sustainability

1. Has the LOCAL GOVERNMENT reviewed and assessed each of those municipally owned and operated facilities with the potential for generating polluted stormwater runoff?
 - a. Has the LOCAL GOVERNMENT determined the potential pollutants associated with the facilities identified?
 - b. If yes, do municipally owned and operated facility site plans show drainage areas, stormwater and sanitary piping, manholes, cleanouts, drains, inlets, outfalls, oil water separators, and stormwater control devices?
 - c. If yes, has the LOCAL GOVERNMENT identified pollution prevention measures for each municipal facility, e.g., loading and unloading procedures, material handling and storage procedures, activities that are prohibited, vehicle washing and/or maintenance procedures?
 - d. If yes, has the LOCAL GOVERNMENT identified and prioritized which facilities may have the potential for generating polluted stormwater runoff and/or needs a SWPPP or stormwater plan?
 - e. If yes, has the LOCAL GOVERNMENT created SWPPP's or stormwater plans for those identified facilities?
2. Has the LOCAL GOVERNMENT developed an inspection program for municipally owned and operated facilities?
 - a. If yes, does the LOCAL GOVERNMENT perform inspections to minimize/prevent exposure?
 - b. If yes, has the LOCAL GOVERNMENT developed inspection checklists?
 - c. If yes, does the LOCAL GOVERNMENT provide training to inspectors, and is that training documented?
 - d. If yes, are inspections documented for each facility?
 - e. If yes, does the inspection report include any identified deficiencies and the corrective actions taken to fix the deficiencies or correct the root cause?
 - f. If yes, does the LOCAL GOVERNMENT maintain records (and photos) of deficiencies observed?
 - g. If yes, does the LOCAL GOVERNMENT take photos to use in training?
3. Do municipally owned and/or operated facilities utilize oil water separators (OWS)?
 - a. If yes, are OWS maintained and functioning properly?

POLLUTION PREVENTION AND GOOD HOUSEKEEPING FOR MUNICIPAL OPERATIONS

- b. If yes, are inspection and maintenance records documented?
4. Is secondary containment provided for materials (including waste) or products stored outside in tanks and/or containers (where applicable)?
 - a. If yes, is secondary containment free of accumulated water, debris, cracks, holes, or evidence of leaks?
 - b. If yes, are secondary containment drain valves maintained in the closed position unless the facility is draining the secondary containment?
 - c. If yes, does LOCAL GOVERNMENT maintain secondary containment drain logs?
5. Do facilities store materials outside in tanks and storage containers?
 - a. If yes, are tanks and containers in good condition, closed, and properly marked?
 - b. If yes, are tanks, containers, and piping free of rust, pits or deterioration or evidence of leaks?
 - c. If yes, are tanks and containers protected from impacts from moving vehicles and equipment? i.e. bollards and curbs, etc.
6. Does LOCAL GOVERNMENT prohibit activities outside where chemicals could be exposed to stormwater runoff?
7. Does LOCAL GOVERNMENT store material handling equipment, industrial machinery and/or vehicles outside?
 - a. If yes, are there any signs of residual or past spills and leaks?
 - b. If yes, does the LOCAL GOVERNMENT immediately clean them up?
8. Are loading/unloading areas designed and maintained to minimize storm water run-on?
9. Are facilities free of any particulate matter or visible deposits of residuals from roof stacks and/or vents?
10. Are catch basins and inlets in good condition, free of trash, floatables, pollutants, oil and grease and free of any signs of past spills, releases, or illicit discharges?
11. Are all hazardous materials properly labeled and stored to prevent exposure to stormwater runoff?
12. Does each facility describe procedures for the proper disposal of waste?
13. Does LOCAL GOVERNMENT store solid waste in containers?
 - a. If yes, are solid waste containers in good condition and of sufficient size to contain all waste?
 - b. If yes, do solid waste containers have lids and closed drain plugs?
 - c. If yes, are solid waste containers free of waste that requires special handling/disposal?
 - d. If yes, are solid waste containers labeled "Prohibited - No Hazardous Waste, No Recyclable Materials, No Liquids?"
 - e. If yes, are special containers provided for other types of waste? i.e. liquids, hazardous, etc.
14. Do employees know where on-site storm drains discharge?
15. For each facility or operation identified, does the LOCAL GOVERNMENT have site-specific SOPs that identify stormwater controls (i.e., structural and non-structural controls, and operational improvements) to be installed, implemented, and maintained to minimize the discharge of pollutants in stormwater?
16. Has the facility been evaluated for other potential issues that could generate polluted runoff? i.e. issues such as: erosion issues, vehicle fueling stations, bulk storage areas, proper plumbing of indoor floor drains, etc.

POLLUTION PREVENTION AND GOOD HOUSEKEEPING FOR MUNICIPAL OPERATIONS

NPDES PERMIT – PART II SECTION G (2)(c)

BMP: Spill Response Procedures

Measureable Goal: The LOCAL GOVERNMENT shall have written spill response procedures for municipally owned or operated facilities.

MEP

1. Does the LOCAL GOVERNMENT have written spill response procedures for municipally owned or operated facilities?

Sustainability

1. Do written spill response procedure address minor and major spills (minor spills or releases can be controlled at the time of the release by employees in the immediate work area; major spills require specialized training)?
2. Does the local government maintain an updated emergency contact list including internal staff, spill response contractor(s), and government agencies for reporting?
3. Does the LOCAL GOVERNMENT conduct spill response training for municipally owned and/or operated facilities?
4. Does the LOCAL GOVERNMENT maintain spill response training records, i.e., training material and a record of who was trained, what they were trained on and when they were trained?
5. Are spill kits accessible, the locations known by employees, and do they include relevant materials: Personal Protective Equipment (PPE), storm drain inlet/outlet protection and Safety Data Sheets (SDS)?
 - a. Are spill response kits stocked based on an evaluation of types of materials on site, their quantities, and site-specific conditions such as being located adjacent to a creek?
6. Are spills and releases documented (when, what and how much was spilled or released, action taken, who reported the spill or release, and who the spill or release was reported to)?
7. Does the local government properly dispose of contaminated spill cleanup materials and do they maintain disposal documentation?
8. Does the local government have a contract or other arrangement set up for spill response and cleanup by a private contractor?
9. Does the local government conduct periodic evaluations of the municipal spill response program to evaluate how well procedures were followed?
10. Does the local government update procedures and training based on the program evaluations?

POLLUTION PREVENTION AND GOOD HOUSEKEEPING FOR MUNICIPAL OPERATIONS

NPDES PERMIT – PART II SECTION G (2)(d) & (e) & (f)

BMP: Streets, roads, public parking lots and municipally owned or maintained catch basins and conveyance systems

Measureable Goal: The LOCAL GOVERNMENT shall evaluate existing and new BMPs that reduce polluted stormwater runoff from municipally-owned streets, roads, and public parking lots within their corporate limits. The LOCAL GOVERNMENT must evaluate the effectiveness of these BMPs based on cost and the estimated quantity of pollutants removed. The LOCAL GOVERNMENT shall maintain and implement an O&M program for the stormwater sewer system including catch basins and conveyance systems that it owns and maintains.

MEP

1. Does the LOCAL GOVERNMENT evaluate existing and new BMPs that reduce polluted stormwater runoff from municipally-owned streets, roads, and public parking lots within their corporate limits?
2. Does the LOCAL GOVERNMENT evaluate the effectiveness of these BMPs based on cost and the estimated quantity of pollutants removed?
3. Does the LOCAL GOVERNMENT maintain and implement an O&M program for the stormwater sewer system including catch basins and conveyance systems that it owns and maintains?

Sustainability

1. Does the LOCAL GOVERNMENT have a street sweeping program?
 - a. If yes, does the LOCAL GOVERNMENT maintain documentation of sweeping events, i.e., miles swept and the amount of material collected?
 - b. If yes, does the LOCAL GOVERNMENT evaluate street and public parking lots sweeping frequency, timing, routes, and efficiency of existing sweeping programs to minimize the discharge of polluted stormwater runoff?
 - c. If yes, does the LOCAL GOVERNMENT follow a written procedure to dewater and dispose of sweeper waste?
 - d. For areas where sweeping is technically infeasible (e.g., streets without curbs), does the LOCAL GOVERNMENT evaluate and implement any other programs or measures to minimize pollutant discharges to storm drains and creeks?
2. Does the LOCAL GOVERNMENT have a right of way inspection/maintenance program?
 - a. If yes, are right-of-ways maintained to minimize trash and debris, floatables, pollutants, oil & grease?
 - b. If yes, does the LOCAL GOVERNMENT evaluate right-of-way maintenance, including mowing, herbicide and pesticide application, and planting vegetation to minimize surface water impacts?
 - c. If yes, does the LOCAL GOVERNMENT respond to maintenance complaints?
3. Does the LOCAL GOVERNMENT evaluate road and parking lot maintenance, including pothole repair, pavement marking, sealing, and re-paving activities to minimize surface water impacts?
4. Does the LOCAL GOVERNMENT evaluate bridge maintenance activities to minimize surface water impacts?
5. Does the LOCAL GOVERNMENT evaluate cold weather operations, including plowing, sanding, and application of deicing compounds and maintenance of snow disposal areas to minimize surface water impacts?
6. Does the LOCAL GOVERNMENT inspect and maintain municipally owned parking lots?

POLLUTION PREVENTION AND GOOD HOUSEKEEPING FOR MUNICIPAL OPERATIONS

- a. If yes, are parking lots maintained to minimize trash and debris, floatables, pollutants, oil and grease?
- b. If yes, does the LOCAL GOVERNMENT evaluate parking lot maintenance, including paving activities to minimize surface water impacts?
7. Does the LOCAL GOVERNMENT evaluate and update as necessary an O&M program to inspect and maintain municipally owned catch basins and stormwater conveyance systems?
 - a. If yes, does the LOCAL GOVERNMENT inspect and maintain piped and vegetative conveyances, manholes, cleanouts, drop inlets, and outfalls?
 - b. If yes, are open channels, culverts, conveyance systems and other drainage structures maintained to minimize trash and debris, floatables, pollutants, oil and grease?
 - c. If yes, are catch basins and inlets maintained to minimize leaves and grass clippings, trash and debris, floatables, pollutants, oil and grease?
8. Does the LOCAL GOVERNMENT maintain inspection and maintenance records?
9. Does the LOCAL GOVERNMENT have written procedures for the proper disposal of waste removed from the permittee's MS4 and the permittee's municipal operations, including contaminants, dredge spoil, accumulated sediments, floatables, and other debris?
10. Does the LOCAL GOVERNMENT maintain training records, i.e., training material and a record of who was trained, what they were trained on and when they were trained?

DRAFT

POLLUTION PREVENTION AND GOOD HOUSEKEEPING FOR MUNICIPAL OPERATIONS

NPDES PERMIT – PART II SECTION G (2)(g)

BMP: Identify structural stormwater controls

Measureable Goal: The LOCAL GOVERNMENT shall maintain a current inventory of municipally-owned or operated structural stormwater controls installed for compliance with the permittee's post-construction ordinance.

MEP

1. Does the LOCAL GOVERNMENT maintain an inventory (list/map) of the municipally-owned and operated structural stormwater controls installed for compliance with the permittee's post-construction ordinance?

Sustainability

1. Does the LOCAL GOVERNMENT maintain a list/map of all municipally-owned and operated structural stormwater controls?
2. Does the LOCAL GOVERNMENT periodically review and update the list/map to ensure accuracy and any new additions?
3. Does the LOCAL GOVERNMENT have a process/procedure/frequency for updating the list/map that is consistent and repeatable?
 - a. Is the process/procedure tied to a plan review/construction process versus relying on an individual's knowledge?
 - b. Who/what position is responsible for ensuring that list/map gets updated periodically?

POLLUTION PREVENTION AND GOOD HOUSEKEEPING FOR MUNICIPAL OPERATIONS

NPDES PERMIT – PART II SECTION G (2)(h)

BMP: Operation and Maintenance (O&M) for municipally-owned or maintained structural stormwater controls

Measureable Goal: The LOCAL GOVERNMENT shall maintain and implement an O&M program for municipally-owned or maintained structural stormwater controls installed for compliance with the permittee's post-construction ordinance.

MEP

1. Has the LOCAL GOVERNMENT developed a written O&M program for municipally-owned or maintained structural stormwater control devices installed for compliance with the permittee's post-construction ordinance?

Sustainability

1. Does the LOCAL GOVERNMENT inspect and maintain all municipally-owned or maintained structural stormwater control devices through regularly scheduled maintenance activities (or ensure that this is occurring)?
 - a. Who does the inspections – municipal staff or contractor or other combination?
 - b. Who does the maintenance – municipal staff or contractor or other combination?
 - c. Who/what position ensures it gets done?
2. Does the written O&M program specify the frequency of inspections and routine maintenance requirements for municipally owned and/or operated facilities structural stormwater control devices?
 - a. Does that written O&M program get periodically evaluated and revised? If so, by whom?
 - b. Have written inspection check lists been developed and are they used to conduct inspections?
3. Does the LOCAL GOVERNMENT maintain inspection and maintenance records of municipally-owned or maintained structural stormwater control devices?
 - a. Who/what position maintains those records?
 - b. Is there any analysis or evaluation of those records to manage the SCM's?
4. Are the municipally-owned SCM's maintained and functioning properly?
 - a. Is the SCM accessible?
 - b. Is the SCM free of debris, oil and grease, or noxious weeds/plants?
 - a. Do embankments have adequate cover to prevent erosion and are they free of woody shrubs and trees?
 - b. Are inlet/outlet pipes and/or devices clear of debris and undamaged?
 - c. Is the perimeter free of any bare soil, erosion, or gullies?
 - d. Is the SCM forebay in good condition (if applicable)?

POLLUTION PREVENTION AND GOOD HOUSEKEEPING FOR MUNICIPAL OPERATIONS

NPDES PERMIT – PART II SECTION G (2)(i)

BMP: Pesticide, Herbicide and Fertilizer Application Management

Measureable Goal: The LOCAL GOVERNMENT shall ensure municipal employees are properly trained and all permits, certifications, and other measures for applicators are followed.

MEP

1. Does the Local Government ensure municipal employees are properly trained and all permits, certifications, and other measures for applicators are followed?

Sustainability

1. Does the LOCAL GOVERNMENT have a program to ensure that municipal employees (or those employed by the municipality) are properly trained, and all permits, certifications, and other measures for applicators are followed?
 - a. If yes, does the fertilizer and pesticide use program address proper handling, storage, and disposal?
 - b. If yes, does the LOCAL GOVERNMENT periodically evaluate and review the fertilizer and pesticide use program?
 - c. If yes, does the LOCAL GOVERNMENT's pesticide, herbicides, and fertilizers (PHFs) program include standard operating procedures, use restrictions, frequency, storage, training programs and inventory of chemicals used by the permittee? i.e. proper procedures to mow, trim, edge, blow off, remove leaves, mulch and provide weed control?
2. Does the Local Government have written standard operating procedures and policies for those programs?
 - a. If yes, are the standard operating procedures, polices, and written programs reviewed and updated as needed?
 - b. If yes, are reviews of standard operating procedures, policies, and written programs conducted and documented?
 - c. If yes, do the standard operating procedures, polices, and written programs specify what needs to happen, who needs to do it, and when it needs to be done?
 - d. If yes, has the LOCAL GOVERNMENT properly implemented standard operating procedures and written programs?
 - e. If yes, does the LOCAL GOVERNMENT maintain and update a list of employees (or those employed by the municipality) that are properly licensed, trained, and certified?
3. Does the LOCAL GOVERNMENT use Restricted Use Pesticides?
 - a. If yes, are Restricted Use Pesticides limited to licensed applicators or someone under the licensed applicator's direct supervision?

POLLUTION PREVENTION AND GOOD HOUSEKEEPING FOR MUNICIPAL OPERATIONS

NPDES PERMIT – PART II SECTION G (2)(j)

BMP: Staff training

Measureable Goal: The LOCAL GOVERNMENT shall implement an employee training program for employees involved in implementing pollution prevention and good housekeeping practices.

MEP

1. Does the Local Government implement and document a training program for municipal staff that includes training on Pollution Prevention and Good Housekeeping practices?

Sustainability

1. Has the Local Government developed written standard operating procedures and policies to train employees?
 - a. If yes, does training include a general stormwater education component, new technologies, operations, and the permit requirements that apply to the staff being trained?
 - b. If yes, does the LOCAL GOVERNMENT identify and track all personnel requiring training?
 - c. If yes, does the LOCAL GOVERNMENT maintain records of who was trained, what they were trained on (agenda and/or a description of the training), and when they were trained?
 - d. If yes, do all new hires receive training within the first year of their hire date?
 - e. If yes, does the LOCAL GOVERNMENT review and update the training plan as needed?

POLLUTION PREVENTION AND GOOD HOUSEKEEPING FOR MUNICIPAL OPERATIONS

NPDES PERMIT – PART II SECTION G (2)(k)

BMP: Prevent or Minimize Pollution of Stormwater Runoff from all areas used for Vehicle and Equipment Cleaning

Measureable Goal: The LOCAL GOVERNMENT shall describe and implement measures to prevent or minimize pollution of the stormwater runoff from all areas used for vehicle and equipment cleaning.

MEP

1. Does the LOCAL GOVERNMENT describe and implement measures to prevent or minimize pollution of the stormwater runoff from all areas used for vehicle and equipment cleaning?

Sustainability

1. Has the LOCAL GOVERNMENT identified all LOCAL GOVERNMENT -owned or operated areas used for vehicle and equipment cleaning? (vehicle fleet services facilities; including cleaning at contractor-owned or operated facilities)
2. Are the identified cleaning areas shown on a list prepared and maintained for this purpose?
3. Has responsible contact person(s) and contact information been identified for each selected facility? (both LOCAL GOVERNMENT and contractor contacts, if applicable)
4. Has each identified cleaning area been evaluated for its potential to contaminate stormwater runoff? (including access to sanitary sewer, outdoors/indoors, under roof/canopy, curbing, runoff flow paths, amount and characteristics of materials that could cause pollution, terrain or vegetation conducive to natural attenuation of contaminants)
5. Does the LOCAL GOVERNMENT have written procedures to prevent or minimize pollution of the stormwater runoff (e.g., SWPPPs) from all areas used for vehicle and equipment cleaning? (including fire stations)

POLLUTION PREVENTION AND GOOD HOUSEKEEPING FOR MUNICIPAL OPERATIONS

SUSTAINABILITY QUESTIONS APPLICABLE TO THE OVERALL PROGRAM IMPLEMENTATION

1. Is the organization committed to the Stormwater Program, i.e., provided adequate resources and support to meet the requirements of the program?
2. Has the LOCAL GOVERNMENT engaged & collaborated with stake holders?
 - a. Does the LOCAL GOVERNMENT coordinate with other local governments departments and staff, State, or County organizations?
 - b. Does the LOCAL GOVERNMENT collaborate with organizations such as APWA, SWANC, etc. as well as other LOCAL GOVERNMENTS, and other stake holders to strengthen their program?
3. Has the LOCAL GOVERNMENT adopted an Asset Management Plan?
 - a. Does the Asset Management Plan include an inventory of assets, i.e., storm sewers, manholes and catch basins, pump stations, force mains, siphons, culverts, ditches, basins and green infrastructure components;
 - b. Does the Asset Management Plan include an estimate of the current value of the stormwater drainage system, maintenance cost, and replacement cost?
 - c. Does the Asset Management Plan identify where the assets are located, i.e., Geographic Information System (GIS)?
 - d. Does the Asset Management Plan include an evaluation of risk and consequence of failure based on the age of the asset, i.e., probability and consequences of failure?
 - e. Does the Asset Management Plan identify what will need to be done to construct, maintain, or replace certain assets?
4. Does the LOCAL GOVERNMENT have standard operating procedures, policies, and written programs for evaluating program compliance, the appropriateness of best management practices, and progress towards achieving measurable goals?
 - a. If yes, does the LOCAL GOVERNMENT maintain a list of standard operating procedures, policies, and written programs and does the list identify when it was last updated?
 - b. If yes, do the standard operating procedures, policies, and written programs specify what needs to happen, who needs to do it, when it needs to get done? Are responsibilities and assignments documented?
 - c. If yes, has the LOCAL GOVERNMENT properly implemented standard operating procedures, written programs, checklist, policies, etc.?
 - d. If yes, does the local government maintain a table that identifies what best management practices will be used, their frequency, measurable goals, implementation schedule, and the responsible person or position for implementation?
 - e. If yes, are annually reviews of standard operating procedures, policies, and written programs conducted and documented?
 - f. If yes, are standard operating procedures, policies, and written programs revised as needed?
5. Has the LOCAL GOVERNMENT completed an assessment of their Program?
 - a. Has the LOCAL GOVERNMENT conducted and documented annual reviews of their programs, any SOPs, policies and/or written plans?
 - b. Does the LOCAL GOVERNMENT maintain a written explanation of how the LOCAL GOVERNMENT will evaluate the success of their programs?
 - c. Has the LOCAL GOVERNMENT identified recommendations to strengthen their program?

POLLUTION PREVENTION AND GOOD HOUSEKEEPING FOR MUNICIPAL OPERATIONS

6. Has the LOCAL GOVERNMENT developed and implemented an action plan with deadlines to address the areas that need to be strengthened?
 - a. If yes, has the LOCAL GOVERNMENT identified the root causes of any findings and/or recommendations?
 - b. If yes, has the LOCAL GOVERNMENT developed and implement a plan and schedule to address the identified modifications and improvements?
 - c. If yes, has the LOCAL GOVERNMENT documenting changes to programs or practices?
 - d. If yes, has the LOCAL GOVERNMENT identified deadlines to implement changes to the programs or practices?
 - e. If yes, has the LOCAL GOVERNMENT trained Staff on the changes and/or revised SOPs?

DRAFT