

Section 3 **Operation and Maintenance Program**

BMP #2 under MCM #6 in Appendix A of the National Pollutant Discharge Elimination System (NPDES) Stormwater Discharges From Small Municipal Separate Storm Sewer Systems (MS4s) General Permit (PAG-13) requires a permitted municipality to develop, implement, and maintain a written O&M Program for all municipal activities and facilities that could contribute to the discharge of pollutants to receiving waters. Such a written program is recommended whether required by a permit or not. This section of the LIMC Municipal Operations and Maintenance Good Housekeeping Guidance & BMP Manual provides an O&M Program template for a written Good Housekeeping O&M Program to help achieve compliance with this requirement.

3.1 Introduction

An argument can be provided that a written O&M Program for MS4 Permit activities should be executed whether required by a permit or not—it is a good practice. BMP Fact Sheet GH-25 for Building and Grounds Maintenance within this manual outlines an O&M Program as a best management practice. A further argument could be provided that an O&M Program serves as the base section of a SWPPP for municipal good housekeeping activities, and therefore is essentially required by Title 40 (40 CFR).

A written Good Housekeeping Operation and Maintenance Program (O&M Program) can be a group of individual O&M Programs or Operational Plans. For example, a wastewater treatment facility owned and operated by a municipality most likely possesses a separate NPDES Permit. This type of facility should have its own written O&M Program. The Good Housekeeping O&M Program should reference this fact, and the facility's individual O&M Program should be an attachment to the Good Housekeeping O&M Program.

3.1.1 Considerations

A Good Housekeeping O&M Program should focus on pollution prevention and good housekeeping for municipal activities and facilities. The O&M Program should provide specifics to the components of the entire program. Examples of specifics are as follows:

- Description of actual stormwater collection and conveyance system.
- Description of facilities and activities that may contribute pollutants to receiving waters.
- Management practices, policies, etc.
 - The O&M Program should list the specific Best Management Practices (BMPs) utilized to control pollution of stormwater discharges.
- Specifics contemplated in BMP Fact Sheets
 - Defined rain event(s)
 - Responsible personnel
 - Name and address of testing agencies or laboratories
- Operational Plan(s) or individual O&M Programs
 - Waste Disposal procedures
 - Wastewater treatment facilities
 - Facilities requiring separate NPDES permits
 - Spill Response and Control Plan

The Good Housekeeping O&M Program template provided ties the requirements together with the information provided in this manual. The O&M Program is the centralized “starting point” of reference for MCM #6 compliance for an issued NPDES Phase II MS4 Permit.

A binder should be kept with the O&M Program under the first tab. Additional tabs should be provided for quick reference to the attachments noted in the O&M Program.

3.2 Good Housekeeping O&M Program Template

The Good Housekeeping O&M Program template provides the base for development of an all-encompassing program. The template will highlight sections that require an individual municipality’s input to tailor the program to the municipality’s abilities, needs, and goals. The template does not need to be used to develop an individual O&M Program. The manual and template can be used to develop a separate or specific program. The template will also provide guidance on attachments to develop a complete and comprehensive program. **The templates located in the appendix of the LIMC Municipal Operations and Maintenance Good Housekeeping Guidance & BMP Manual can be used for the appropriate attachments noted in the O&M Program template.** Several attachment notations are left blank for individual municipal input. This provides a degree of latitude for the municipality to determine the final content of the program. The template combines the narrative and O&M program descriptions contemplated in Section 2.4. This will provide the basis for a complete MS4 PPGHP. The template can be found on the next page. **The analytical sampling and testing activities outlined within the IDD&E program (for MCM #3) can be used as a support tool for analytical monitoring noted within the O&M Program template in lieu of a separate analytical monitoring program.**