

**CITY OF NEW ORLEANS
CHIEF ADMINISTRATIVE OFFICE**

POLICY MEMORANDUM NO. 140

November 27, 2017

TO: All Departments, Boards, Agencies and Commissions
FROM: Jeffrey P. Hebert, Deputy Mayor and Chief Administrative Officer
SUBJECT: Policies for Stormwater Pollution Prevention



I. PURPOSE

This memorandum establishes the policies and procedures for complying with the City's Municipal Separate Storm Sewer Permit (MS4) with regards to good housekeeping, spill, and pollution prevention for all City departments and agencies who maintain facilities, vehicles, or other City equipment that could impact the MS4. This policy shall supersede all existing policies regarding stormwater pollution prevention.

II. DEFINITIONS

- a. "Best Management Practices (BMPs)" may include practices which prevent or reduce the pollution, prohibitions of practices, operating procedures and practices to control runoff, spillage or leaks, waste disposal or drainage from raw material storage.
- b. "Illicit discharges" are discharges of non-stormwater to the storm drainage system. Examples are discharges from internal floor drains, appliances, industrial processes, sinks, and toilets that are connected to the nearby storm drainage system. These discharges should be going to the sanitary sewer system, a holding tank, an on-site process water treatment system, or a septic system.
- c. "Minor Spills" are those spills that have a volume less than any reportable quantity, can be controlled and cleaned up with on-site resources, do not contaminate the environment, and do not cause injury to personnel.
- d. "MS4" is a conveyance or system of conveyances (including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, man-made channels, or storm drains). Owned or operated by a state, city, county or district, association, having jurisdiction over stormwater that discharges to waters of the United States.
- e. "Pollutant" can be considered any dredged spoil, solid waste, incinerator residue, fuel, filter backwash, sewage, garbage, sewage sludge, munitions, chemical, wastes, biological materials, radioactive materials, heat, wrecked or discharged equipment, rock, sand, sediment, and industrial, municipal, and agricultural waste discharged into water.

- f. "Run-off" is the part of precipitation, snow melt, or irrigation water that runs off the land into streams or other surface water. It can carry pollutants from the air and land into the receiving waters.
- g. "Spill Prevention and Response Plan" is a plan consisting of structures and action plans to prevent and respond to spills of hazardous substances as defined in the Clean Water Act. The Plan details the equipment, workforce, procedures, and steps to prevent, control, and provide adequate countermeasures to a discharge.

III. POLICY GOALS

- 1. The City will develop and implement practices that allow it to:
 - a. Operate and maintain City-owned facilities and equipment with the ultimate goal of preventing or reducing pollutant runoff from municipal operations into the storm sewer system.
 - b. Train City employees and contractors on how to incorporate pollution prevention/good housekeeping techniques into daily operations.
 - c. Establish appropriate BMPs for pollution prevention to meet established goals in the City's Stormwater Management Plan.
- 2. The development and implementation of these practices will be overseen by the Chief Administrative Officer ("CAO") in coordination with staff responsible for the maintenance of City fueling facilities and management of City property.
- 3. The requirements of this Order apply to any City department, ("agency"), including work conducted by a third-party agency contractor.

II. IMPLEMENTATION

- 1. Implementation of the Pollution Prevention Policy will be overseen by the CAO, who will work with the City's departments and agencies to:
 - a) Identify a lead pollution prevention coordinator for each applicable City agency who will be responsible for managing that agency's compliance with the policy;
 - b) Develop and adopt a Spill Prevention and Response Plan to be on file at all City-owned facilities;
 - c) Inventory City-owned facilities that handle pollutants and procure spill clean-up kits for each facility; and
 - d) Establish a mandatory annual pollution prevention and spill response training program for any City employees or contractors who:
 - 1. Use or maintain City-owned vehicles or equipment that require fueling, or;
 - 2. Handle hazardous materials or "pollutants" as defined above, or;
 - 3. Perform regular work that disturbs earth or involves maintenance of the streets or drainage network.
 - e) Develop and implement a protocol for the performance of annual inspections of facilities for stormwater compliance.

III. Reporting.

1. The City will designate a single repository for all records and reports associated with stormwater compliance.
2. Designated Pollution Prevention Coordinators will be responsible for reporting on spills, training completion, and annual inspections to the records repository.

IV. INQUIRIES

Questions regarding this memorandum should be addressed to the Office of Resilience and Sustainability.

JPH/tja