



Environmental Health and Safety

Stormwater Operations & Maintenance Plan

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Stormwater Operations and Maintenance Plan

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A. PURPOSE

The Northern Arizona University campus is currently listed as a small non-traditional municipal separate storm sewer system (MS4) by the Arizona Department of Environmental Quality (ADEQ) and is regulated under the Phase II rules with the Environmental Protection Agency. In accordance with ADEQ's MS4 General Permit (#AZG2021-002), NAU is required to develop and implement a municipal operation and maintenance (O&M) plan to ensure compliance through the permit period.

This document serves as the NAU O&M Plan. It is based upon Best Management Practices (BMPs) for stormwater facility, pipe and ditch maintenance requirements.

As required, the O&M Plan lists procedures to minimize stormwater pollution from high impact activities. The O&M Plan includes appropriate pollution prevention and good housekeeping procedures for all of the following operations, activities, and/or types of facilities that are present within the NAU boundaries, including the following:

1. Stormwater collection and conveyance system, including catch basins, piping, channels, ditches and culverts.
2. Deicing and snow removal on roads and parking lots.
3. Storage, washing and maintenance of vehicle fleets and fueling facilities.
4. External building maintenance, including cleaning and painting.
5. Proper application of fertilizer, pesticides and herbicides on "parks and open spaces" as well as sediment and erosion control, landscape maintenance and vegetation disposal, and trash management for those areas.
6. Stormwater protection at material storage areas, heavy equipment storage areas and maintenance areas not covered under other NPDES permits.
7. Any other facilities that would reasonably be expected to discharge contaminated runoff.

This Plan applies to all employees and students at Northern Arizona University. It is commonly applicable to units in Facilities Services who conduct the activities above. It is also commonly applicable to Housing and Food Services, Recreation Activities, Sports Programs, and Intercollegiate Athletics, and facilities staff at the Health & Learning Center (medical).

B. STORMWATER COLLECTION AND CONVEYANCE SYSTEM

The stormwater collection and conveyance system includes catch basins, piping and other facilities used for stormwater conveyance and/or treatment. This section lists operations and maintenance requirements for catch basins, piping and other facilities.

1. Catch Basins

Most catch basins have a storage area at the bottom to trap sediments, debris, and other particles that can settle out of stormwater, thereby preventing clogging of downstream piping and washing of these solids into the surface water ultimately receiving drainage water.

When the catch basin is approximately 60 percent full of sediment, sediment can begin to wash into stormwater piping. Oils and grease, petroleum hydrocarbons, debris, metals, sediment, and contaminated water collect in catch basins, oil/water separators, and settling

basins. Outlet traps (downturned elbows) are required to trap oil and other floatables and must be replaced or repaired when damaged or missing.

Clean catch basins when they are half full or when the sediment and debris is within 18 inches of the bottom of the outlet pipe. Follow additional manufacturer guidance and requirements on catch basin inspection and maintenance.

2. Stormwater Piping

Stormwater piping must be in good condition. Piping should be inspected regularly and repaired as needed.

The Geographic Information System department in Facilities Services has developed a map of the storm sewer system showing the locations of all known storm drain outfalls, labeling the receiving waters, and delineating the areas contributing runoff to each outfall. The map (or completed portions of the map) must be available on request as needed. The preferred, but not required, format of submission will be an electronic format with fully described mapping standards.

The MS4 permit requires NAU to conduct field inspections and visually inspect for illicit discharges at all known outfalls that discharge to surface waters. NAU must visually inspect all known outfalls at least once each year and develop and implement procedures to identify and remove illicit discharges. Records of inspections and follow-up activities must be maintained.

3. Other Stormwater Facilities

Other facilities can include both structural and non-structural stormwater facilities, such as green stormwater infrastructure elements including trees, vegetation, and soil. All of these facilities require routine maintenance to ensure their functionality is maintained. Frequency and level of maintenance varies based on the facility location, function, and exposure to impacts. Facilities should be maintained according to the following actions:

- Promptly repair or replace all substantially cracked or otherwise damaged secondary containment and any deterioration that threatens the structural integrity of the facilities, and replace cleanout gates, catch basin lids, and rock in emergency spillways, etc as needed.
- Inspect and clean stormwater treatment facilities, conveyance systems, and catch basins as needed, and determine whether improvements in operation and maintenance procedures are needed.
- Ensure that storm drain capacities are not exceeded and that heavy sediment discharges to the drainage system are prevented.
- Regularly remove debris and sludge from facilities used for treatment. Dewater, transport, and dispose of the material as solid waste as approved by the local or state government, or have it professionally removed by a contractor. If visual or olfactory indications of pollution are noted, the waste must be characterized to ensure it is disposed of properly.

C. DEICING AND SNOW REMOVAL

1. Snow Removal

Snow removal is preferred to de-icing with chemicals.

2. Selecting Deicers

Select deicers and anti-icers that result in the least adverse environmental impact. Apply only as needed using minimum quantities.

Where feasible and practical, use roadway deicers such as calcium magnesium acetate, potassium acetate, or similar materials that cause less adverse environmental impact than urea, and sodium chloride.

3. Maintenance After Deicing

Increase maintenance of stormwater structures as necessary.

Sweep or clean up accumulated deicing and anti-icing materials and grit from roads as soon as possible after the road surface clears.

D. STORAGE, WASHING AND MAINTENANCE OF VEHICLES AND EQUIPMENT

Pollutants released while washing vehicles and equipment include surfactants, petroleum hydrocarbons, toxic organic compounds, oils and greases, nutrients, metals, and suspended solids. These pollutants must not be discharged to the storm drainage system or directly into receiving waters.

1. Vehicle and Equipment Storage

Ensure that stored vehicles are not leaking oil or other fluids into storm drains.

2. Vehicle and Equipment Washing

Wastewater from cleaning vehicles and equipment must be discharged into a sanitary sewer drain at a site that is approved for discharge.

- Conduct indoor vehicle and equipment washing in an area that drains to the sanitary sewer and that prevents the wash water from flowing outside and entering the storm drainage system.
- Conduct outdoor vehicle and equipment washing in a designated wash area that drains to a sump (like a grit separator) or a catch basin and then to the combined sewer or another appropriate wastewater treatment or recycling system. Or, discharge wash water into a sanitary sewer. If washing occurs in an uncovered area, keep stormwater out of the sanitary sewer as much as possible when not actively washing vehicles or equipment. For wash pads that discharge directly to the separated sanitary sewer, the uncovered portion of the wash pad must be no larger than 200 square feet or must have an overhanging roof. This is to prevent excess stormwater from entering the sanitary sewer. If the wash pad cannot be less than 200 square feet, a shut off valve may be installed which will direct wash water to the sanitary sewer when the wash pad is in use and stormwater to the drainage system when the wash pad is not in use. The valve on the positive control outlet may be manually operated; however, a pneumatic or electrical valve system is preferable.

The valve may be on a timer circuit, where it is opened upon completion of a wash cycle. The timer would then close the valve after the sump or separator is drained. Signage and training is required for this system.

- The wash area must be clearly marked.

4. Vehicle and Equipment Maintenance

The following BMPs or equivalent measures are required for activities engaged in automotive repair and maintenance activities:

- Employees must be educated annually about the need for careful handling of automotive fluids. New employees must be trained upon hiring. Employees at businesses or public agencies that routinely change or handle these fluids must be trained in spill prevention and cleanup. All training must be documented.
- Spill cleanup materials, such as rags and absorbent materials, must always be kept close at hand when changing oil and other fluids. Soiled rags and other cleanup material must be properly disposed of or professionally cleaned and reused.
- Maintenance and repair activities must be conducted indoors.
- Drain all fluids that have the potential to leak from wrecked vehicles, and equipment when they arrive. Store and dispose of fluids properly.
- If the work must be performed outdoors or at a mobile location such as a construction site, drip pans or other containment devices must be used beneath the vehicle or equipment to capture all spills and drips.
- Make sure all outside materials that have the potential to leach or spill to the drainage system are covered, contained, or moved to an indoor location.
- Maintenance and repair areas cannot be hosed down. Instead, they must be swept weekly or more often as needed to collect dirt, and spills must be wiped up with rags and other absorbent materials. If pressure washing is necessary, the wastewater must be collected and disposed of properly. It cannot be discharged to the stormwater drainage system.
- Drains located inside buildings must be connected to the sanitary sewer. Do not allow drains inside maintenance buildings to connect to the sanitary sewer without prior approval by EH&S.
- If floatable components are present, use an oil/water separator or other appropriate treatment to treat all runoff from the fluid changing area prior to discharge to the sanitary sewer.
- If extensive staining and oily sheen is present, absorbent pillows or booms must be used in or around catch basins and properly maintained to prevent oil from entering the stormwater drainage system.

4. Washing and Cleaning of Food Service Equipment

This section applies to washing and cleaning of commercial cooking equipment, such as vent filters, grills, floor mats, and grease and pretreatment devices. Such washing and cleaning should always occur indoors with discharges to the building sanitary sewer (via grease traps/tanks) or to a holding tank for shipment to an offsite disposal facility or approved treatment system. If the washing activity cannot be moved indoors or contained in a tub, the washing area must drain to a sanitary sewer, holding tank, or process treatment system. Provisions must be made to prevent the flow of stormwater onto the washing area.

Wash water must be discharged into a sanitary sewer drain. It is illegal to discharge the dirty wash water to the stormwater drainage system. In addition:

- Wipe off the equipment before washing to remove fats, oil, grease and food waste.
- Do not pour cooking grease down the drain. Collect and dispose of all grease properly.
- If roof equipment or hood vents are cleaned, ensure that no wastewater or process water is discharge to the roof drains or storm water system.

E. BUILDING EXTERIOR MAINTENANCE

1. Pressure Washing

Eliminate or minimize building exterior pressure washing whenever possible.

Avoid soap when pressure washing; use heat, steam and/or water pressure instead.

If pressure washing with cold water and the building exterior is not coated with lead-containing paint or other hazardous material, it is okay to discharge the wash water to a storm drain. Otherwise, collect the wash water for appropriate disposal in the local sanitary sewer or offsite as a hazardous waste. Install berms to keep contaminated wash water from entering storm drains. Consult with EH&S on whether sampling is needed to determine if the wash water is hazardous waste.

If the job generates a lot of sediment or debris, lay filter fabric on the ground or install a commercial catch basin insert in the drain to catch the debris. Dispose of this fabric and its contents appropriately.

When washing loading docks or drain trenches, berm the area and/or block the drain. Collect the wash water in containers. Let solids settle before decanting liquid and skim FOG (Fats, Oils & Greases) off the top. Dispose of wash water in the sanitary sewer or, if the water contains hazardous materials (e.g. metals, paint), manage it as hazardous waste.

Don't allow wash water to soak into landscaping unless you have made arrangements with Grounds staff.

Collect wash water for discharge to sanitary sewer. Obtain permission from EH&S or the NAU Project Manager to discharge to sanitary sewer during construction-related activity.

2. Use of Solvents or Cleaners

Avoid the use of acids, solvents, soap or detergents whenever possible. Even products that are labeled "biodegradable" are not allowed to enter storm drains.

If soap or detergents must be used, collect your wash water using berms, plastic and other means. Dispose wash water into a sanitary sewer unless the building is coated in lead paint. If you are washing surfaces coated with lead paint, collect and take a sample of the wash water. If the lead concentration exceeds 3 ppm, the wash water cannot be disposed into the sanitary sewer. It must be managed as hazardous waste.

If you must use solvents, collect the wastewater for disposal as hazardous waste.

If you must use acidic products, collect the wash water for neutralization or characterization.

F. APPLICATION OF FERTILIZER AND PESTICIDES

Avoid fertilizer and pesticide application whenever possible. Follow the campus integrated pest management (IPM) plan and use pesticides sparingly. If pesticides or herbicides are used, they must be carefully applied in accordance with label instructions and the Federal Insecticide, Rodenticide and Fungicide Act (FIFRA) and applicable State laws. Maintain appropriate vegetation, properly apply fertilizer where necessary, or consider the use of pest resistant varieties when possible. Also where practical, grow plant species appropriate for the site.

1. Application of Pesticides

Choose the least toxic pesticide that is capable of reducing the infestation to acceptable levels.

Conduct any pest control during the life stage when the pest is most vulnerable. For example, if it is necessary to use a *Bacillus thuringiensis* application to control tent caterpillars, it must be applied before the caterpillars form their cocoons or it will be ineffective. The pest control method should be site-specific rather than using generic.

When necessary to use, apply pesticides according to the directions on the label and use the following BMPs:

- Conduct spray applications according to specific label directions and the applicable local and state regulations.
- Do not apply pesticides if it is raining or immediately before expected rain (unless the label directs such timing).
- Ensure that the pesticide application equipment is capable of immediate shutoff in the event of an emergency.
- Do not apply pesticides within 100 feet of open waters including wetlands, ponds, streams, sloughs, or any drainage ditch or channel that leads to open water except when approved by the Department of Ecology or Seattle Public Utilities (all sensitive areas including wells, streams, and wetlands must be flagged prior to spraying.) Take care to avoid contamination or site disturbance during applications.
- Never apply pesticides in quantities that exceed the manufacturer's instructions.
- Mix pesticides and clean the application equipment under cover in an area where accidental spills will not enter surface water or ground water and will not contaminate the soil.

2. Storage of Pesticides

- Store pesticides in enclosed areas or in covered impervious containment.
- Do not hose down the paved areas to a storm drain or conveyance ditch.
- Ensure that pesticide-contaminated waste materials are kept in designated covered and contained areas, and disposed of properly.

- Rinsate from equipment cleaning and/or triple-rinsing of pesticide containers should be used as product or recycled into product.

3. Application of Fertilizer

- Ensure that all fertilizers are applied by properly trained personnel. Document and keep all training records.
- For commercial and industrial facilities, ensure that fertilizers are not applied to grass swales, filter strips, or buffer areas that drain to sensitive receiving waters.

G. MATERIAL AND EQUIPMENT STORAGE

1. Outdoor Storage of Materials

This section applies to outdoor storage and transfer of solid raw materials, byproducts, or products such as, but not limited to, gravel, sand, salts, topsoil, compost, logs, sawdust, wood chips, lumber and other building materials, concrete, and metal products typically stored outside in large piles or stacks.

Cover and contain materials to prevent erosion whenever possible. Erosion results in stormwater contamination and loss of valuable product.

Sweep paved storage areas daily or more often as necessary to collect and dispose of loose solid materials. Do not hose down the contained stockpile area if the discharge will flow into a storm drain or a drainage conveyance.

For stockpiles containing more than five cubic yards of erodible or water-soluble materials such as soil, deicing salts for roads, compost, unwashed sand and gravel, and sawdust; and for outside storage areas for solid materials such as logs, bark, lumber, and metal products, do one or more of the following:

- Store materials inside a building or on a covered outdoor paved area, preferably surrounded by a berm.
- Place temporary plastic sheeting (polyethylene, polypropylene, hypalon, or equivalent material) over the material. Anchor sheeting to prevent contact with rainfall.

For large stockpiles that cannot be covered:

- Install containment devices, such as a berm or a low wall around the perimeter of the pile and at any catch basins as needed to prevent erosion of the stockpiled material and to prevent discharge of leachate from the stockpiled material off the site or to a storm drain.
- Ensure that contaminated stormwater is not discharged directly to catch basins without being conveyed through a treatment BMP.
- Inspect and maintain catch basins regularly (weekly or more often as needed).

Maintain the quantity of materials necessary to prevent the erosion of large stockpiles and loss of valuable materials.

2. Storage of Contaminated Soils

This section applies to the storage of soils contaminated with toxic organic compounds, petroleum products, or metals.

- Cover or enclose the storage area for the contaminated soils and contain it with a curb, dike, or berm constructed around the material storage area if possible.
- Sweep paved storage areas daily or more often as needed. Stock cleanup materials such as brooms, dust pans, and vacuum cleaners near the storage area.
- Regularly inspect and maintain catch basins and other drainage systems on the site to prevent contaminated materials from entering stormwater and leaving the site. Sediment from such cleaning must be disposed of properly in accordance with applicable law, which may include ADEQ Regulations.

3. Outdoor Portable Container Storage

The following applies to outdoor portable containers used to store accumulated food wastes, vegetable or animal grease, used automotive fluids, liquid feedstock or cleaning compounds, chemicals, or dangerous wastes (liquid or solid), and contaminated stormwater.

- Wherever possible, store containers on a paved surface under a roof or other appropriate cover or in a building.
- Store materials in a leak-proof container with a tight-fitting lid.
- All containers must have labels identifying their contents. Apply labels and position containers so labels are clearly visible. If the material is hazardous waste it should have a hazardous waste label.
- Place drip pans beneath all taps on mounted containers and at all potential drip and spill locations during the filling and unloading of containers.
- Inspect container storage areas regularly for corrosion, structural failure, spills, leaks, overfills, and failure of piping systems. Check containers daily for leaks and spills. Replace containers, and replace and tighten bungs in drums as needed.
- Secure drums in a manner that prevents accidental spillage, pilferage, or any unauthorized use.
- Place containers mounted for direct removal of a liquid chemical for use by employees inside a containment area as described above. Use a drip pan during liquid transfer.
- Keep the minimum amount of materials necessary on hand to prevent large quantities of liquids on site.

For hazardous materials, also do the following:

- Provide covered secondary containment. Alternatively, the storage area shall be paved and surround by a berm or dike and covered. The dike must be high enough to hold a volume of either 10 percent of the total volume of the enclosed containers or 110 percent of the volume of the largest container, whichever is greater, or if a single container, 110 percent of the volume of that container. The area must be sloped to drain into a dead-end sump for the collection of leaks and small spills.
- Dangerous wastes that do not contain free liquids must be stored in a designated sloped area with the containers elevated or otherwise protected from stormwater run-on.
- Ensure that the storage of reactive, ignitable, or flammable liquids complies with the the most recent edition of the Uniform/International Fire Code.
- Keep containers with dangerous waste inside a building unless this is impractical due to site constraints or the requirements of the UFC/IFC.

- If the material is a hazardous waste, you must also comply with hazardous waste rules. Call the NAU EH&S office for more information about what qualifies as hazardous waste.

4. Storage of Liquids in Permanent Aboveground Storage Tanks

This section applies to aboveground storage tanks that contain liquids (excluding uncontaminated water) including, but are not limited to, aboveground heating oil tanks and gasoline and diesel tanks.

To prevent stormwater contamination, install secondary containment or a double-walled tank. Add safeguards against accidental releases, including guards around the tanks to protect them from vehicle or forklift damage, and place tags on valves to reduce human error. Design containment areas around the tank so that potential stormwater contamination can be minimized and managed.

Locate and design tanks to prevent and minimize stormwater contamination as follows:

- Locate permanent tanks in an impervious (Portland cement concrete or equivalent) secondary containment area.
- Surround the secondary containment area with dikes or provide double walled tanks approved by the Underwriters Laboratory (UL). Design the dike to be of sufficient height to provide a containment volume of either 10 percent of the total volume of the enclosed tanks or 110 percent of the volume of the largest tank, whichever is greater, or if a single tank, 110 percent of the volume of that tank.
- Secondary containment must be emptied regularly to prevent contaminated liquid from overflowing into the drainage system.
- If the tank containment area is not covered, equip the outlet from the spill-containment sump with a shutoff valve, which is normally closed. The valve should only be opened to convey contaminated stormwater to an approved treatment system or disposal facility or to convey uncontaminated stormwater to a storm drain.
- Place adequately sized drip pans beneath all mounted taps and locations where drips and spills might occur during the filling and unloading of tanks.
- Include a tank overfill protection system to minimize the risk of spillage during loading.

Implement the following maintenance activities to prevent and minimize stormwater contamination:

- Inspect tank containment areas regularly to identify problems (e.g., cracks, corrosion, leaks) with components such as fittings, pipe connections, and valves. Replace or repair tanks that are leaking, corroded, or otherwise deteriorating. Document and keep all inspection records.
- Sweep and clean the tank storage area regularly.

5. Parking Lot Maintenance and Storage of Vehicles and Equipment

This section applies to parking lots and areas where vehicles or equipment are stored outside.

The following BMPs or equivalent measures are required for activities related to the parking and storage of vehicles and equipment:

- Sweep or vacuum parking lots, storage areas and driveways regularly to collect dirt, waste, and debris and dispose as solid waste.

- Do not hose down or pressure wash areas that drain to a storm drain or to the surface water ultimately receiving drainage water.
- If a parking lot must be washed, discharge the wash water to a sanitary sewer or other approved wastewater treatment system, if allowed by the City of Flagstaff, or collect it for offsite disposal. Cover storm drains to prevent wash water from entering the surface water ultimately receiving drainage water. Discharges to the sanitary sewer are regulated by the City of Flagstaff Industrial Wastewater Program. In some cases, contaminated stormwater may need to be pretreated before it is discharged to the sanitary sewer. For approval before discharging wash water to the sanitary sewer, contact NAU EH&S.
- Make sure all outside materials that have the potential to leach or spill to the drainage system are covered, contained, or moved to an indoor location.
- An oil removal system such as an API or coalescing plate oil/water separator, catch basin filter, or equivalent BMP that is approved by the City is required for parking lots that meet the threshold vehicle traffic intensity of a high-use site. If a catch basin filter is used, maintain the filter regularly (weekly or as needed) to prevent plugging.

H. OTHER CAMPUS FACILITIES

1. Cleaning and Maintenance of Swimming Pools and Spas

Dispose of pool or spa water to the sanitary sewer after notifying the NAU EH&S prior to discharge. Chlorine levels must be monitored and recorded prior to discharge.

2. Roadside Ditches

The following BMPs or equivalent measures are required for activities related to the maintenance of roadside ditches:

- Inspect roadside ditches regularly, as needed to identify sediment accumulations and areas of localized erosion.
- Clean ditches on a regular basis, as needed:
 - Keep ditches free of rubbish and debris.
 - Conduct ditch maintenance (seeding, fertilizer application, and mowing) when most effective, usually in late spring and/or early fall.
 - Do not apply fertilizer unless needed to maintain vegetative growth.
 - Do not leave material from the ditch cleaning on roadway surfaces.
 - Sweep and remove dirt and debris that remains on the pavement at the completion of ditch cleaning operations.
 - Segregate clean materials from suspect or contaminated materials. Non-contaminated soils may be handled as “clean soils” and non-contaminated vegetative matter can be composted or disposed of in a municipal waste landfill, if permitted. Suspected contaminated or contaminated material removed from ditches must be tested and handled according to the hazardous waste regulations unless testing indicates that it is not hazardous waste.
- Vegetation in ditches often prevents erosion and cleanses runoff:

- Remove vegetation only when flow is blocked or excess sediments have accumulated.
- Use grass vegetation, unless specified otherwise by NAU Grounds (e.g., for natural drainage systems).
- Establish vegetation from the edge of the pavement if possible or at least from the top of the slope of the ditch.
- Diversion ditches on top of cut slopes that are constructed to prevent slope erosion by intercepting surface drainage must be maintained to retain their diversion shape and capability.
- Inspect culverts on a regular basis for scour or sedimentation at the inlet and outlet, and repair as necessary. Give priority to culverts in areas of high sediment load, such as those near subdivisions during construction.