

SUBJECT: CITY DEPARTMENT MANAGER AND STAFF REQUIREMENTS FOR PROTECTION OF RECEIVING WATERS

Purpose: The purpose of this Administrative Procedure Memorandum (APM) is to ensure conformance with standard operating procedures, pollution prevention plans and best management practices as mandated by the Wisconsin Department of Natural Resources and the United States Environmental Protection Agency and to ensure protection of the environment and elimination of pollution discharges to waters of the United States.

Further, it is the purpose of this APM to establish that all Public Works Agencies are responsible for compliance with these requirements in accordance with the requirements established for each respective agency.

Definitions:

- **Standard Operating Procedures (SOPs)** - The set of written instructions that document the required activity to be followed by the agency staff.
- **Stormwater Pollution Prevention Plan (SWPPP)** - A plan whereby a facility thoroughly evaluates potential pollution sources at a site and selects and implements appropriate measures designed to prevent or control the discharge of pollutants into stormwater runoff.
- **Spill Prevention, Control, and Countermeasure Plan (SPCC Plan)** - A written set of procedures required under EPA 40 CFR 112.3 to prevent, control, and mitigate the a discharge of oil. The purpose of the plan is to prevent oil from reaching navigable waters and adjoining shorelines, and to contain accidental discharges of oil.
- **City of Madison Wisconsin Pollutant Discharge Elimination System Stormwater Discharge Permit (Stormwater Permit)** - The Permit issued to the City of Madison by the Wisconsin Department of Natural Resources (WDNR) to allow the City to discharge stormwater to the waters of the United States as required by the Clean Water Act and enforced by the United States Environmental Protection Agency (US EPA). The term of the permit is five years. The City maintains a Municipal Separate Storm Sewer System (MS4).

Regulatory Requirements: The City of Madison holds a Stormwater Permit as administered and enforced by the WDNR and the US EPA. The permit mandates that routine work by City staff conform to Standard Operating Procedures (SOPs) as established by the City and approved by the US EPA, to minimize or prevent pollution discharges due to the work being performed. Further, the permit requires that most City-owned facilities develop a Stormwater Pollution Prevention Plan (SWPPP) with Best Management Practices for control of pollution discharges due to activities that take place at the respective site. Finally, the permit requires that City-owned facilities complete and operate in accordance with Spill Prevention, Control, and Countermeasure (SPCC) Plans.

Requirements of the City Engineer: The City Engineer shall create SOPs for routine tasks that City employees perform such as repair of water main and sewer breaks, tree stump grinding, park grading and other public works activities in consultation with the affected agency, US EPA and WDNR. The SOP shall cover the tasks necessary to comply with the environmental regulations enforced by the US EPA and WDNR.

The City Engineer shall create SWPPPs for each public works facility in coordination and cooperation with the affected City agency, US EPA and WDNR. These practices include both operational changes as well as physical improvements needed for the site. A SWPPP for each Public Works Site shall be completed in the timeline required by the US EPA. Once completed, the plan shall be reviewed and approved by the regulatory agencies to ensure compliance with the City's Stormwater Permit.

The City Engineer shall review public sites to determine which are required to create and operate under a SPCC plan. Once the sites requiring a plan are determined, City Engineering staff shall provide templates and assistance to the departments to allow them to complete the required certification forms, or work with the department's staff to hire a Professional Engineer to complete the SPCC (required in limited cases).

The City Engineer shall designate staff to assist the agency with the training of staff involved in the activities affected by the SOP, SPCC, and SWPPP requirements.

Once SWPPPs are complete for the specific Public Works Sites, the City Engineering shall complete an annual audit of the sites and prepare a report for inclusion in our annual Stormwater Permit Report to the WDNR. Annually, the results of the audit shall be provided to the agency department head for review, signature and to implement corrective actions if needed.

Requirements of the Department or Division Head:

- SOPs, SPCCs and SWPPPs shall be agreed to and signed by the affected department/division head once they have been approved by the regulatory agency.
- The department/division head shall ensure conformance with the SOPs, SPCCs and SWPPPs.
- The department/division head shall ensure that all staff who directly supervise or who take part in the activities affected by the SOP, SPC and/or SWPPP attend a training at a minimum of once per year.
- The department/division head shall ensure that they include budget requests in their Capital and Operating budgets as required to comply with the SOPs, SPCCs and SWPPPs.

Requirements of the Supervisor:


- Ensure that staff attends the required training sessions.
- Ensure that City staff is provided the knowledge, tools and equipment required to comply with this APM and the SOPs, SPCCs and SWPPPs.
- Ensure that new staff are adequately trained and informed as to the requirements of this APM and the SOPs, SPCCs and SWPPPs.
- Ensure that the leadworker and crew take immediate action when found to be out of compliance with this APM and the SOPs, SPCCs and SWPPPs.

Requirements of the Leadworker:

- Attend required training. Become familiar with and comply with the requirements of this APM and the SOPs, SPCCs and SWPPPs.
- Ensure that staff under the leadworker's direction comply with the requirements of this APM and the SOPs, SPCCs and SWPPPs.

Requirements of the Employee: Attend required training. Become familiar with and comply with the requirements of this APM and the SOPs, SPCCs and SWPPPs.

Failure to Comply: Failure to comply with the requirements of this procedure shall be considered misconduct and shall be subject to remedial action, which may include discipline, up to and including discharge.


Paul R. Soglin
Mayor

APM No. 3-19
February 25, 2016