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Water Division, Mail Code: WC-15J
U.S. EPA, Region 5
77 West Jackson Blvd.
Chicago, IL 60604

December 21, 2020

RE: Summit Maintenance Facility Public Works Site – 1902 Freeport Road , Madison Wi, 53711

Dear Ms. Chase:

The City of Madison has developed a SWPPP for the Summit Maintenance Facility Public Works Site. Please review the following documents, and provide comment if our proposed actions are satisfactory to the EPA.

Sincerely,

Robert F. Phillips, P.E.,
City Engineer

RFP:pdg

12/21/2020

Municipal Storm Water Pollution Prevention Plan

Summit Maintenance Facility Public Works Site

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Summit Maintenance Facility Public Works Site

1. Introduction

1.0 SWPPP Overview

This storm water pollution prevention plan (SWPPP) has been developed as required under Section C.(6) of Wisconsin Pollutant Discharge Elimination System (WPDES) No. WI-S0584163 for storm water discharges and in accordance with good engineering practices. This SWPPP describes each facility and its operations, identifies potential sources of storm water pollution at the facility, recommends appropriate best management practices (BMPs) or pollution control measures to reduce the discharge of pollutants in storm water runoff, and provides for periodic review of this SWPPP.

This Storm Water Pollution Prevention Plan:

- identifies the SWPPP coordinator with a description of the coordinator's duties;
- identifies members of the SWPPP team and lists their responsibilities;
- describes the facility, with information on location and activities, a site map, and a description of the storm water drainage system;
- identifies potential storm water contaminants;
- describes storm water management controls and various Best Management Practices (BMPs) needed to reduce pollutants in storm water discharges;
- describes the facility's monitoring plan; and
- describes the implementation schedule and provisions for amendment of the plan.

1.1 Background

The City of Madison is a Phase 1 NR216 community permitted through the Wisconsin Department of Natural Resources (WDNR). The NR216 legislation ultimately came from the Clean Water Act which is administered by the Environmental Protection Agency (EPA) and the WDNR.

The City of Madison is a member of the Madison Area Municipal Storm water Partnership (MAMSWaP) a group comprised of 21 central Dane County municipalities, Dane County, and UW-Madison. Members of MAMSWaP are co-permitees under WI DNR WPDES Permit No. Wl-S058416-4. This permit regulates storm water discharges in accordance with ch. 283, Wis. Stats. and subch. I of ch. NR 216, Wis. Adm. Code, and implements the non-agricultural and transportation facility performance standards of ch. NR 151, Wis. Adm. Code. A copy of this permit is provided in Appendix 1.

This permit covers all areas under the ownership, control or jurisdiction of the City of Madison that contribute to discharges from a Municipal Separate Storm Sewer System (MS4). An MS4 is defined as *"a conveyance, or system of conveyances (including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, manmade channels, or storm drains), that are owned or operated by a co-permittee and designed or used for collecting or conveying storm water".* Permit requirements are intended to reduce the amount of pollutants entering storm water runoff or otherwise entering MS4s. Discharges from these MS4s consist of runoff from rain, and snow and ice melt. Pollutants of concern in storm sewer system discharges include organic materials, suspended solids, metals, nutrients, bacteria, pesticides, fertilizer, and traces of toxic materials.

A major component of this permit includes pollution prevention at municipal garages, public works facilities, and storage areas. Section C.6. (e) requires each co-permittee to carry out pollution prevention procedures at municipal garages, public works facilities, and storage areas. A Storm Water Pollution Prevention Plan is required to be developed and implemented for each of these facilities operated by the City of Madison.

1.2 Goals & Objectives

The City of Madison has made it a priority to reduce nonpoint source pollution to surface water and groundwater from urban storm water sources. This SWPPP is a component of the City's comprehensive city-wide storm water management efforts to identify nonpoint source pollution loadings and investigate mitigating measures.

This SWPPP is intended to satisfy the following goals:

- Implement and maintain Best Management Practices (BMPs) that identify, reduce, eliminate, and/or prevent the discharge of storm water pollutants;
- Prevent violations of surface water quality, ground water quality, or sediment management standards; and
- Eliminate the discharges of unpermitted process wastewater, domestic wastewater, non-contact cooling water, and other illicit discharges to storm water drainage systems.

Given these goals, the specific objectives of this SWPPP are to:

- Identify potential sources of storm water and non-storm water contamination to the storm water drainage system;
- Identify and prescribe appropriate "source area control" type best management practices designed to prevent storm water contamination from occurring;
- Identify and prescribe "storm water treatment" type best management practices to reduce pollutants in contaminated storm water prior to discharge;
- Prescribe actions needed either to bring non-storm water discharges into compliance with WPDES permit or to remove these discharges from the storm drainage system;
- Prescribe an implementation schedule so as to ensure that the storm water management actions prescribed in this SWPPP are carried out and evaluated on a regular basis; and
- Identify operations, maintenance, inspections and record keeping needed for these BMPs.

1.3 Coverage & Availability

This SWPPP covers the operations of the City of Madison Parks Division at the Summit Maintenance Facility Public Works Site.

A copy of this SWPPP will be maintained on-site.

2. Pollution Prevention (P2) Team

The Parks Department shall create a Storm Water Pollution Prevention (P2) team. The P2 team shall be responsible for implementing, maintaining the SWPPP at the Summit Maintenance Facility Public Works site.

The P2 Team is s responsible for:

- Coordination and oversight of plan development, implementation and update; and
- Implementation of preventive maintenance program;
- Oversight of good housekeeping activities inside and out in the public works yard;
- Spill response coordination;
- Oversight of employee training programs;
- Performance of quarterly inspections;
- Maintenance of all records and ensuring documentation submitted to City.

The Parks Department shall designate a SWPPP Coordinator to lead its P2 team. The Coordinator should have the authority to make decisions regarding site activity and have a working knowledge of the outdoor activities. Other members of the team should consist of representatives from the Parks Department.

The City Engineering shall assign a Professional Engineer to assist the P2 Team. The Engineer's responsibilities shall include:

- Providing technical assistance to identify potential pollutants;
- Develop and implement BMPs;
- Inspection and reporting of the facility

The P2 team member rosters are provided in Appendix 2.

3. Site Assessment

3.0 Site Description

The Summit Maintenance Facility Public Works site is located on Madison's southwest side at 1902 Freeport Road in Madison, Wisconsin. The 1.36 acre parcel has frontage on Freeport Road.

The Summit Maintenance Facility parcel is zoned LI (Industrial).

This site is operated by the Parks divisions.

Parks facilities on this site include 3 buildings providing Office space, vehicle and equipment storage, and vehicle maintenance. The employee parking lot is located North of the buildings.

Figure 1

1.36 acre Summit Maintenance Facility

3.1 Site Drainage

3.1.1 Outfalls

The Summit Maintenance Facility Public Works (SMFPW) site is located in Outfall Basin NS01-B-0248-H-MAD-C in the Nine Springs Creek (NS01) watershed. The SMFPW site makes up 0.75% of the basin's 181.6 acres. Appendix 6 presents a general location map of the facility and shows the following features:

- the facility location;
- the drainage area boundary for the storm water outfalls serving the facility;
- the name and location of receiving waters.

Storm water runoff from the SMFPW site sheet flows off the site to the east and is routed to the east. The storm water is collected in stormsewer on Freeport road and conveyed to the east and then south to Dunn's Marsh and eventually in to Nine Springs Creek.

3.1.2 Site Drainage

The Summit Maintenance Facility Public Works yard storm water conveyance system consists of 2 drainage basins (A and B).

Basin A drains untreated to the east edge of the parcel and then enters the municipal stormsewer system via street inlets. Basin A represents 79% of the total site drainage. The area identified as A contains the drainage area for 3 of the maintenance buildings and the employee parking.

Basin B drains untreated to the East and then enters the municipal stormsewer system via street inlets. Basin B represents 21% of the total site drainage area. It contain the southern maintenance building and the above ground fuel tanks.

Appendix 6 shows the following site specific features:

- storm drainage collection and disposal system;
- structural storm water controls;
- secondary or other containment structures;

3.2 SITE ACTIVITIES

The primary responsibilities of the staff at the Summit Maintenance Facility Public Works facility is the servicing of mowers and power machinery used to maintain park land. There are two fuel tanks , one diesel and one Gasoline , onsite for filling mowers and other maintenance vehicles and equipment.

3.3 Potential Pollutants

A site activity and materials inventory of potential to storm water contaminates and an accompanying map is provided in Appendix 7.

3.4 Illicit Discharges and Spills

There has been no history of illicit discharges or spills at this facility.

Future spills will be addressed under the Spill Prevention and Clean Up Plans to be prepared for each facility included in this document in Appendices 3 and 4.

4. Best Management Practices

There are currently no structural controls to treat stormwater at the Summit Maintenance Facility Public Works site. Sweeping of the site is the only water quality practice currently conducted.

5. Monitoring Plan

The City is developing and implementing a storm water monitoring plan in accordance with its WPDES permit. City Engineering is the lead agency for implementation of the monitoring plan.

The following sections describe monitoring and reporting requirements for this SWPPP.

The purpose of monitoring is to:

a) Evaluate stormwater outfalls for the presence of non-storm water discharges , and
b) Evaluate the effectiveness of the companies pollution prevention activities in controlling contamination of storm water discharges.

Monitoring components are described in the following sections.

5.0 Illicit Disharge Detection and Elimination

The Engineering Division shall perform dry weather inspections of storm pipes in the street along the eastern edge of the parcel on an annual basis. Instances of dry weather flow, stains, sludge, color, odor, or other indications of a non-storm water discharge shall be documented and immediately reported to City Engineering and Madison/Dane County Public Health. Engineering and Public Health will work together to identify the sources of the illicit discharge and eliminate it.

5.1 Site Compliance Inspections

The City Engineer shall assign a Professional Engineer to perform an annual inspection to evaluate the effectiveness of the SWPPP. The inspection shall be adequate to verify that the site drainage conditions and potential pollution sources identified in the SWPPP remain accurate, and that the best management practices prescribed in the SWPPP are being implemented, properly operated and adequately maintained. Information reported shall include the inspection date, inspection personnel, scope of the inspection, major observations, and revisions needed in the SWPPP.

6.0 Implementation Schedule

This SWPPP becomes effective as of ***01/01/2021.***

7.0 Record Keeping and Reporting

The quarterly inspections, and maintenance activities will be record on the forms in Appendix 5 and kept onsite with the SWPPP.

8.0 Certification of the SWPPP

I certify that this document and attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information contained in the plan. Based on my inquiry of the person, or persons, who manage the system, or those persons directly responsible for gathering the information; the information contained in this document is, to the best of my knowledge and belief, true, accurate and complete. Based upon inquiry of persons directly under my supervision, and to the best of my knowledge and belief, the provisions of this document adhere to the provisions of the storm water permit for the development and implementation of a Storm Water Pollution Prevention Plan and that the plan will be complied with.

Robert Phillips, P.E. City Engineer

Date

Appendix 1 - WPDES Permit

Appendix 2 - SWPPP (P2) Team Roster

SWPPP Coordinator

Chad Hughes

Contact Info: 608-266-4826 (O)
608-575-4508 (C)
_____(H)

Team Members

1 .Chad Hughes Cell - 608-575-4508
2. Chuck Speth Office - 608-266-4826
3. Dennis Heidenreich Office - 608-266-4826

Appendix 3: Spill Prevention, Control and Counter Measures Plan

The Summit Maintenance Facility currently has two above ground 1000 gallon tanks that are inspected and maintained by Fleet services. The inspection and maintenance record is maintained by fleet services.

In accordance with 40 CFR 112.5 (b), a review and evaluation of this Spill Prevention,

Control and Countermeasures Plan (SPCC) will be conducted every three years. A registered Professional Engineer shall certify any change or amendment to the SPCC plan. This certification must be completed within six months after a change in facility design, construction, operation or maintenance occurs which affects the facility's potential for discharge of oil into or upon the Navigable Waters of the United States or adjoining shorelines.

Review Dates	**Signature**
1. August 1, 2024	_____
2. August 1, 2027	_____
3. August 1, 2030	_____
4. August 1, 2033	_____
5. August 1, 2036	_____

_____

* SPCC plan amended and certified by a Registered Professional Engineer per 40 CFR 112.3 (d)

Management Approval

The City of Madison is committed to the prevention of discharges of any nature into navigable waters or the surrounding habitat. Therefore, a regular review and update of spill prevention, control and countermeasures procedures will be held to the highest standards.

_____	_____
Authorized Facility Representative	Signature
_____	_____
Title	Date

Facility Distance to Navigable Waters and Adjoining Shorelines

Storm water runoff from the SMFPW site sheet flows off to the east. The maps provided in Appendix 6 show outfall locations and drainage from the site to Nine Sprigs Creek. There is 3546 feet of storm sewer between the facility and Dunn's Marsh. Additionally, there is a large screen structure located just upstream of the marsh. If a large spill were to occur, the outlet pipe of the screen structure could be plugged and this could be a viable pumping location.

Facility Storage

1000 gallon tank diesel Fuel

1000 gallon tank gasoline

Potential Spill Predictions, Volumes, Rates and Control

Aboveground Storage Tanks not associated with emergency generators

Source	Type of failure	Volume (gal)	Rate of Flow (Gal./Hr.)	Direction of Flow	Containment (Gal.)
Above Ground Tank	Tank Rupture	1000	1000	East	Zero
Above Ground Tank	Tank Rupture	1000	1000	East	Zero

Spill Prevention Measures

Bollards around above ground tanks

Double walled tank.

Spill Control Equipment and Cleanup:

a. Spill control equipment on site includes absorbent pads and sorbent socks, granular sorbent, empty drums, brooms and shovels. Spill cleanup materials are located in the Southern Storage Building.

APPENDIX 4: Fuel Transfer Procedures

General Safety Requirements

A. No Smoking is permitted, Nor use of any Flame or Spark producing devices (i.e. Lighters, Cell Phones, . . .) at or near the Fueling Station at any time.
B. Extreme caution must be taken during fuel transfer operations for any potential ignition source.
C. Vehicle engines must shut off during fuel transfers.
D. The fuel delivery hose must be attended to throughout the fueling process. Automatic trip-shutoff devices are not to be relied upon to prevent overfilling of vehicle or portable tanks.
E. Portable tanks are to be placed on the pavement inside the containment structure while being filled. Do not fill portable tanks that are in, on, or around a vehicle or boat.
F. Report any Spills or Leaks to the Fleet Services representatives immediately.

Fueling Operations:

A. At the Fuel Pump, select the proper fuel (#1 Unleaded, #2 Diesel).
B. Remove nozzle from dispenser and place in tank to be fueled.
C. Do Not Over Fill Vehicle or Portable Tank.
D. When fueling is complete, drain nozzle into tank and replace back in the dispenser.

Emergency Contacts

Fleet Services (608) 246-4546

National Response Center (800) 424-8802

Local Police, Fire, and EMS 9-1-1

Appendix 5: Site Inspection Form

SUMMIT MAINTENANCE fACILITY STORMWATER QUARTERLY INSPECTION REPORT

Inspections must be conducted by a person with the knowledge and skills to assess conditions and activities that could impact stormwater quality at the facility, and evaluate the effectiveness of best management practices required by this permit. Retain a copy of the completed and signed form with the SWPPP.

FACILITY NAME:	**INSPECTION TIME:** **DATE:**

WEATHER INFORMATION:

- Description of Weather Conditions (e.g., sunny, cloudy, raining, snowing, etc.):

  _____

  _____

- Was stormwater (e.g., runoff from rain or snowmelt) flowing at outfalls and/or discharge areas shown on the Site Map during the inspection: ☐ **Yes** ☐ **No** ☐ **Comments:**

  _____

  _____

I. POTENTIAL POLLUTANT SOURCE AREA INSPECTION AND BEST MANAGEMENT PRACTICES EVALUATION

	Yes	No	Findings and Remedial Action Documentation: Describe any findings below and the schedule for remedial action completion including the date initiated and date completed or expected to be completed.
SWPPP and Site Map: Have a copy of the SWPPP and site map with you during the inspection so that you can ensure they are current and accurate. Use it as an aide in recording the location of any issues you identify during the inspection. • Is the Site Map current and accurate? • Is the SWPPP inventory of activities, materials and products current? Any new potential pollutant sources must be added to the map and reflected in the *SWPPP Facility Assessment & Tables (Appendix 7).*			

	Yes	No	NA	Findings and Remedial Action Documentation:
Vehicle/Equipment Areas: ***Equipment cleaning: Check NA if not performed on-site. Skip section.*** Is equipment washed and/or cleaned only in designated areas? • Observe washing: Is all wash water captured and properly disposed of? ***Equipment fueling: Check NA if not performed on-site. Skip section.*** • Are all fueling areas free of contaminant buildup and evidence of chronic leaks/spills? • Are all chemical liquids, fluids, and petroleum products, on an impervious surface that is surrounded with a containment berm or dike that is capable of containing 10% of the total enclosed tank volume or 110% of the volume contained in the largest tank, whichever is greater? • Are structures in place to prevent precipitation from accumulating in containment areas? o If not, is there any water or other fluids accumulated within the containment area? o Note: If containment areas are not covered to prevent water from accumulating, the SWPPP must include a plan describing how accumulated water will be managed and disposed of.				

Equipment maintenance:	Yes	No	NA	Findings and Remedial Action Documentation:
• Are maintenance tools, equipment and materials stored under shelter, elevated and covered? • Are all drums and containers of fluids stored with proper cover and containment? • Are exteriors of containers kept outside free of deposits? • Are any vehicles and/or equipment leaking fluids? Identify leaking equipment. • Is there evidence of leaks or spills since last inspection? Identify and address. • Are materials, equipment, and activities located so that leaks are contained in existing containment and diversion systems (confine the storage of leaky or leak-prone vehicles and equipment awaiting maintenance to protected areas)? Add any additional site-specific BMPs: _____ _____ _____ _____				

I. POTENTIAL POLLUTANT SOURCE AREA INSPECTION AND BEST MANAGEMENT PRACTICES EVALUATION				
Good Housekeeping BMPs:	**Yes**	**No**	**NA**	**Findings and Remedial Action Documentation:**
1. Are paved surfaces free of accumulated dust/sediment and debris? • Date of last quarterly vacuum/sweep _____ • Are there areas of erosion or sediment/dust sources that discharge to storm drains? 2. Are all waste receptacles located outdoors: • In good condition? • Not leaking contaminants? • Closed when is not being accessed? • External surfaces and area free of excessive contaminant buildup? 3. Are the following areas free of accumulated dust/sediment, debris, contaminants, and/or spills/leaks of fluids? • External dock areas • Pallet, bin, and drum storage areas • Maintenance shop(s) • Equipment staging areas (loaders, tractors, trailers, forklifts, etc) • Around bag-house(s) • Around bone yards • Other areas of industrial activity: _____ _____ _____ _____ _____ _____ _____ _____				

Spill Response and Equipment:	**Yes**	**No**	**NA**	**Findings and Remedial Action Documentation:**
Are spill kits available, in the following locations? • Fueling stations • Transfer and mobile fueling units • Vehicle and equipment maintenance areas Do the spill kits contain all the permit required items? • Oil absorbents capable of absorbing 15 gallons of fuel. • A storm drain plug or cover kit. • A non-water containment boom, a minimum of 10 feet in length with a 12 gallon absorbent capacity. • A non-metallic shovel. • Two five-gallon buckets with lids. Are contaminated absorbent materials properly disposed of?				
I. POTENTIAL POLLUTANT SOURCE AREA INSPECTION AND BEST MANAGEMENT PRACTICES EVALUATION				
General Material Storage Areas:	**Yes**	**No**	**NA**	**Findings and Remedial Action Documentation:**
• Are damaged materials stored inside a building or another type of storm resistance shelter? • Are all uncontained material piles stored in a manner that does not allow discharge of impacted stormwater? • Are scrap metal bins covered? • Are outdoor containers covered?				

II. CORRECTIVE ACTION AND SWPPP MODIFICATIONS DESCRIPTIONS: Additional space to describe inspection findings and corrective actions if needed. Provide brief explanation of the general location and the rationale for the additional or different BMPs.				

III. CERTIFICATION STATEMENTS AND SIGNATURES:

Inspector - Certification: This section must be completed by the person who conducted the site inspection prior to submitting this form to the person with signature authority or a duly authorized representative of that person.

☐ The facility is in compliance with the terms and conditions of the SWPPP and the Stormwater General Permit.

☐ The facility is out of compliance with the terms and conditions of the SWPPP and the Industrial Stormwater General Permit. This report includes the remedial actions that must be taken to meet the requirements of the SWPPP and permit, including a schedule of implementation of the remedial actions.

"I certify that this report is true, accurate, and complete, to the best of my knowledge and belief."

Inspector's Name – Printed	**Inspector's Signature**	**Inspector's Title**	**Date**

Permittee – Certification:

☐ The facility is in compliance with the terms and conditions of the SWPPP and the Industrial Stormwater General Permit.

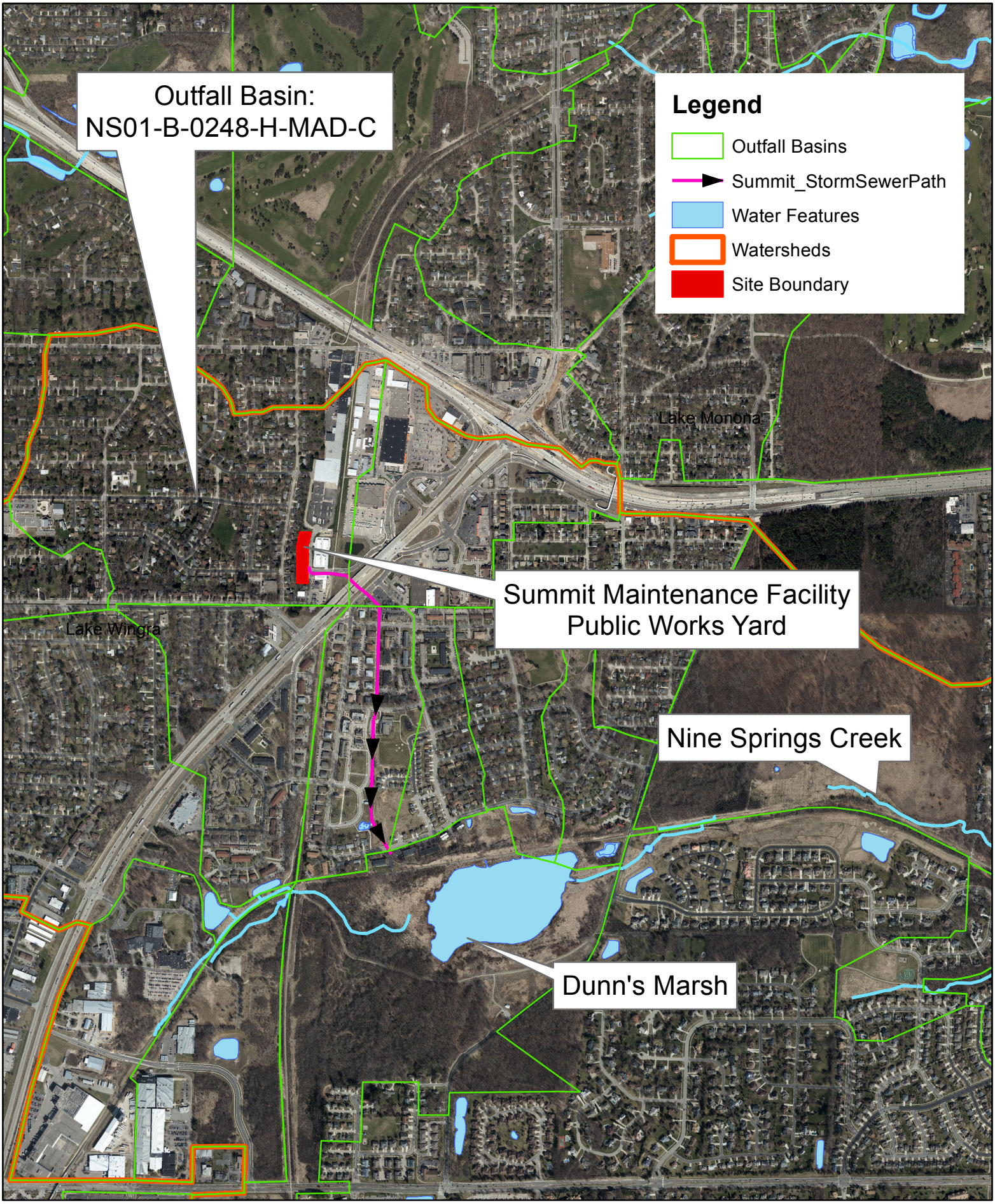
☐ The facility is out of compliance with the terms and conditions of the SWPPP and the Industrial Stormwater General Permit. This report includes the remedial actions that must be taken to meet the requirements of the SWPPP and permit, including a schedule of implementation of the remedial actions.

"I certify under penalty of law, that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

PRINTED NAME of person with **Signature Authority** or a **Duly Authorized Representative**[1]	SIGNATURE of person with **Signature Authority** or a **Duly Authorized Representative**[1]	**DATE**

[1]A person is duly authorized representative only if 1) the authorization is made in writing by a person described in APPENDIX 2 and submitted to Engineering, and 2) the authorization specifies either an individual or a position having responsibility for the overall operation of the regulated *facility*, such as the position of plant manager, superintendent, position of equivalent responsibility, or an individual or position having overall responsibility for environmental matters.

Appendix 6: Drainage Maps



Appendix 6: Site Map
Summit Public Yard
Drainage Map

N
W E
S

0 0.125 0.25 0.5 Miles

Appendix 7: Site Assessment

Summit Maintenance Facility Public Yard
Risk Assessment Map

N
W
E
S

0 25 50 100 Feet

ACTIVITY/MATERIAL	LOCATION MAP ID		POTENTIAL POLLUTANTS						STORM WATER RISK		CURRENT PRACTICE
	Indoors	*Outdoors*	*Sediment*	*Nutrients*	*Metals*	*Hydrocarbons*	*Toxins*	*other*	*Likelihood of Contact*	Risk of release	
Gasoline and diesel fuel dispensing		M-1			●	●	●		●	○	● Vehicles fueled outside
Vehicle repair and maintenance	B-1 B-2		○	-	●	●	●	Leaks and spills - Fuel benzene, oil, hydraulic oil, transmission fluids, brake fluids, ethylene glycol, lead acid	○	○	● Vehicles repaired and maintained indoors Floor drains in theses facilities are connected to the sanitrary sewer system and pretreated with and oil separator (M-8)
Vehicle storage and parking	B-3	M-2 M-3	●		●	●	○	Leaks and spills - Fuel benzene, oil, hydraulic oil, transmission fluids, brake fluids, ethylene glycol, lead acid	●	○	● Outside vehicle storage drains to stormsewer
Broom Storage		M-6	◒		○	○			●	○	Outside storage of broom attachments
Vehicle washing		M-5	●	●		●		Grass, Dirst , Oil, Soap	●	◒	● Vehicle washing occationally performed Outdoors. Runoff drains to the storm system
Refuse		M-4	●	●					○	○	● Garbage collected in standard covered municipal garbage can
Metal Drum Storage		M-7			◒				●	○	● Stored outside before being repainted
Office Space	B-5										
Paint Preparation and Use	B-4				●		●	Paint, Metals	○	○	● Stored inside in a container, Sand blaster in blast cabinet leaks would be collected in floor drains and sent to sanitary sewer

KEY

●	High
◒	Medium
○	Low
–	Not Applicable

Summit Maintenance Yard

2020 Site Assessment

M-1 Fuel Tanks

M-2 Vehicle Storage

M-6 Broom Storage

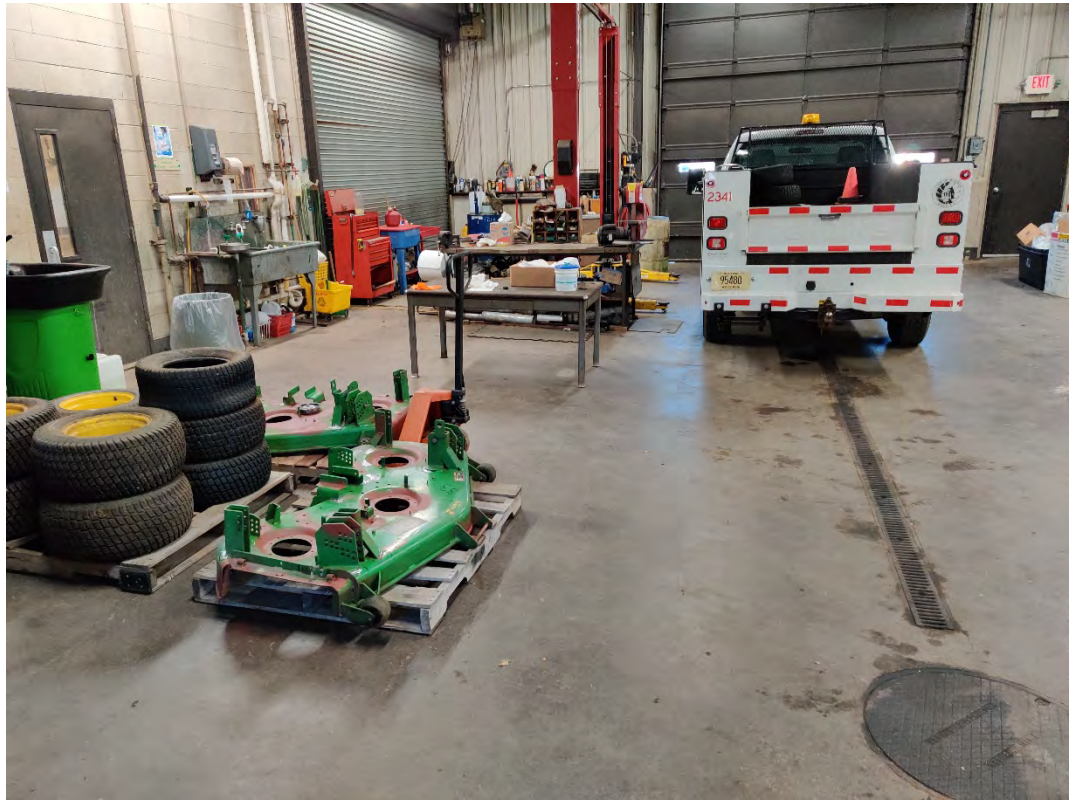
M-7 Metal Drum Storage

B-3 Mower and Bobcat Storage

M-7 Metal Drum Storage

M-5 Outside Vehicle Wash Area

M-4 Outside Refuse



B-1 Indoor Vehicle Maintenance

M-7 Metal Drum Storage

M-4 Outside Refuse