

CHAPTER 10

POLLUTION PREVENTION PLAN

10.1 INTRODUCTION

Virginia Stormwater Management Program (VSMP) land-disturbing activities covered under the General Construction Permit (GCP) are required to develop a Stormwater Pollution Prevention Plan (SWPPP) in accordance with Chapter 13. One of the components of the SWPPP is the development of a pollution prevention plan (PPP).

The PPP identifies potential sources of pollutants that may reasonably be expected to affect the quality of stormwater discharges from the construction site (both on- and off-site activities). The PPP also describes control measures that will be used to minimize pollutants in stormwater discharges from the construction site.

10.2 APPLICABILITY

In accordance with Sec. 10-36 of the Henrico County Code, the requirements of this chapter apply to all VSMP land-disturbing activities. For help determining the land disturbance activity type, please refer to Chapter 3 of this Manual.

10.3 REQUIREMENTS

A PPP that addresses potential pollutant generating activities that may reasonably be expected to affect the quality of stormwater discharges from the construction activity, including any support activity, must be provided. The PPP must:

1. Identify potential pollutant-generating activities and pollutants expected to be exposed to stormwater;
2. Describe the location where the potential pollutant generating activity will occur, or reference the Environmental Compliance Plan (ECP), if appropriate;
3. Identify all authorized non-stormwater discharges that are or will be comingled with stormwater discharges from the construction activity, including any applicable support activity;
4. Identify the person responsible for implementing the pollution prevention practice(s) for each pollutant generating activity, if other than the person listed as the qualified personnel;
5. Describe pollution prevention procedures and practices that will be implemented to:

- a. Prevent and respond to leaks, spills and other releases including (i) procedures for expeditiously stopping, containing, and cleaning up spills, leaks and other releases; and (ii) procedures for reporting leaks, spills, and other releases;
 - b. Prevent the discharge of spilled or leaked fuels and chemicals from vehicle fueling and maintenance activities (e.g., providing secondary containment such as spill berms, decks, spill containment pallets, providing cover where appropriate, and having spill kits readily available);
 - c. Prevent the discharge of soaps, detergents, solvents, and wash water from construction materials, including the cleanup of stucco, paint, form release oils, and curing compounds (e.g., providing (i) cover (e.g., plastic sheeting or temporary roofs) to prevent contact with stormwater; (ii) collection and proper disposal in a manner to prevent contact with stormwater; and (iii) a similarly effective means designed to prevent discharge of these pollutants);
 - d. Minimize the discharge of pollutants from equipment and vehicle washing, wheel wash water, and other types of washing (e.g., locating activities away from surface waters and stormwater inlets or conveyance and directing wash waters to sediment basins/traps, using filtration devices such as filter bags or sand filters or using similarly effective controls);
 - e. Direct concrete wash water into a leak-proof container or leak-proof settling basin. The container or basin must be designed so that no overflows can occur due to inadequate sizing or precipitation. Hardened concrete wastes must be removed and disposed of in a manner consistent with the handling of other construction wastes. Liquid concrete wastes must be removed and disposed of in a manner consistent with the handling of other construction wash waters and shall not be discharged to surface waters;
 - f. Minimize the discharge of pollutants from storage, handling, and disposal of construction products, materials, and wastes, including (i) building products such as asphalt sealants, copper flashing, roofing materials, adhesives, concrete admixtures; (ii) pesticides, herbicides, insecticides, fertilizers, and landscape materials; and (iii) construction and domestic wastes such as packaging materials, scrap construction materials, masonry products, timber, pipe and electrical cuttings, plastics, styrofoam, concrete, and other trash or building materials;
 - g. Prevent discharges of fuels, oils, and other petroleum products, hazardous or toxic waste, and sanitary wastes; and
 - h. Address any other discharges from potential pollutant generating activity not addressed above.
6. Describe procedures for providing pollution prevention awareness of all applicable wastes, including any wash water, disposal practices, and applicable disposal locations of such wastes, to personnel in order to comply with the conditions of the GCP.

10.4 IMPLEMENTATION:

The requirements discussed in the previous section are addressed on the County's standard pollution prevention plan sheet and in the SWPPP binder that is discussed in Chapter 13.

The requirements, where they are addressed, and the responsible parties are summarized in Table 10-1.

A. Pollution Prevention Plan Sheet

The standard pollution prevention plan sheet developed by the County describes and includes many of the required pollution prevention plan practices and procedures. The standard plan sheet is a required component of the Pollution Prevention Plan and it is the plan preparer's responsibility to ensure that all information is filled out accurately prior to ECP approval. During, or after the pre-construction meeting, any modifications to the pollution prevention plan will become the responsibility of the owner/operator.

The standard pollution prevention plan sheet is available from the Department of Public Works (DPW). It can also be found on the DPW website.

B. Pollution Prevention Information Contained within the SWPPP

The Pollution Prevention Plan requirements not addressed on the standard plan sheet can be found in the SWPPP binder. Requirements that must be addressed in the SWPPP binder include items such as identification of all non-stormwater discharges and the person(s) responsible for the pollution prevention activities for each pollutant-generating activity. The SWPPP binder, including information supplied by the plan preparer, will be provided by the County at the pre-construction meeting.

10.5 COMPLIANCE INSPECTIONS

The operator is responsible for conducting the inspections described in Chapter 18 of this manual. The Administrator will conduct inspections in accordance with Sec. 10-54 of the Henrico County Code to monitor compliance with the Pollution Prevention Plan requirements of an ECP. The inspections will be conducted at least once every three months. The inspection results, including non-compliance items and the actions necessary to correct these deficiencies, will be documented and delivered to the operator, delegated authority, and/or authorized personnel.

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Various levels of enforcement actions, as outlined in Chapter 20, are available to the County for non-compliance with the Pollution Prevention Plan portion of the ECP. These actions include, but are not limited to, Notices to Comply and Stop Work Orders.

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Table 10-1 - Pollution Prevention Plan Requirements of the GCP		Where to find:		Responsible Party:	
		Plan Sheet	SWPPP Binder	Plan Preparer	Operator
1.	Identify potential pollutant-generating activities & pollutant expected to be exposed to stormwater		✓	✓	✓
2.	Location where pollutant-generating activities will occur (can reference the ECP)		✓	✓	✓
3.	Identify all authorized non-stormwater discharges		✓		✓
4.	Identify person responsible for the pollution prevention practices for each pollutant-generating activity (if other than the person listed as the qualified personnel)		✓		✓
5.	Describe procedures and practices that will be implemented to:				
	a) Prevent and respond to leaks, spills and other releases and implement chemical spill and leak prevention and response procedures	✓		✓	✓
	b) Prevent the discharge of spilled or leaked fuels and chemicals from vehicle fueling and maintenance activities	✓		✓	✓
	c) Prevent the discharge of soaps, detergents, solvents and wash water from construction materials, including paint, stucco, form release oils, and curing compounds	✓		✓	✓
	d) Minimize the discharge of pollutants from equipment and vehicle washing, wheel wash water and other types of washing	✓		✓	✓
	e) Direct concrete wash water into a leak-proof container or leak-proof settling basin	✓		✓	✓
	f) Minimize the discharge of pollutants from storage, handling or disposal of construction products, materials and wastes, trash, landscape materials, fertilizers, pesticides, herbicides, detergents, and sanitary waste	✓		✓	✓
	g) Prevent discharges of fuels, oils, and other petroleum products, hazardous or toxic waste, and sanitary wastes	✓		✓	✓
	h) Address any other discharges from potential pollutant generating activity not addressed above	✓		✓	✓
6.	Describe procedures for providing pollution prevention awareness of all applicable waste	✓	✓	✓	✓