



## TECHNICAL PAPER NO. 3

### STORMWATER AND HAZARDOUS MATERIALS, COORDINATION EFFORTS IN FORT COLLINS

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City of Fort Collins, Stormwater Utility Regulations regarding stormwater quality create a necessity for stormwater managers to become involved in a mind boggling variety of environmental management activities. Part 1 of the municipal permit application process requires a description of management programs to deal with items ranging from construction activities, to wetlands protection, to emergency spill response. With the variety of topics that need to be addressed, it will be increasingly important for stormwater management agencies to identify other players in the environmental arena and coordinate their efforts.

To stormwater management agencies C factors, floodway and floodplain, FEMA, FIRM, and recurrence intervals are familiar jargon. But, how about TSD facilities, CERCLA, RECRA, SARA title III, RQ, and EHS. The alphabet soup of hazardous materials and hazardous waste regulation can be baffling. Even worse is the long lists of unfamiliar chemical names that confronts one delving into the lists of hazardous materials. If that were not enough, what is hazardous to one agency, or set of regulations, may not be to another.

The importance of cooperation between agencies increases as a stormwater quality program matures. Part 2 of the municipal permit applications require much greater detail with regards to control of hazardous materials. Requirements include descriptions of activities to "facilitate the proper management and disposal of used oil and other toxic materials...", to "monitor and control pollutants in stormwater discharges to municipal systems from municipal landfills, hazardous waste treatment, storage and disposal

facilities, industrial facilities that are subject to SARA title III ... and industrial facilities that... are contributing a substantial pollutant loading...." Additionally, wet weather monitoring requirement for municipal stormwater includes a laundry list of hazardous chemicals. Industrial dischargers are faced with another list of "if expected to be present" chemicals. Preliminary efforts to coordinate management of hazardous materials in Fort Collins includes City Utility Services - Light and Power, Water and Wastewater, and the Stormwater Utility. Also involved within the City government is the Natural Resources Department, the Poudre Fire Authority and Police Services. Within the Larimer County government the Department of Health and Environment, Natural Resources, and Emergency Management all have a role in hazardous materials or waste management.

The City's Natural Resources department has identified, within its Environmental Management Plan, a number of topics that could fall into the general category of materials management (not all hazardous, at least at the moment). Many of these are of interest to the Stormwater Utility. They include:

- Solid Waste and Recycling
- Hazardous Waste Disposal
- Sewage Waste Disposal
- Hazardous Materials Transportation
- Hazardous Materials Risk Reduction
- Underground Storage Tanks
- Emergency Response and Cleanup
- Pesticide Use and Management

These categories, which often overlap, are used to identify pertinent parts of the city code, responsible departments, and holes in the system.

The Department of Natural Resources coordinates an oil drop off day for Citizens and provides public education on a variety of environmental topics.

Both Light and Power, and the Water and Wastewater Utilities have conducted internal audits on their use, storage and disposal of hazardous materials. For example, Light and Power eliminated use of PCB in transformers prior to

regulatory requirements, while the Water Utilities have changed laboratory practices to generate less hazardous waste. The Stormwater Utility hazardous materials program has to date been largely a public education campaign. Inlets to the storm sewer system have been stenciled to inform people that storm sewers flow directly to water bodies. Many people moving here from other parts of the country may not know that we have separate systems. Also monitoring of the stormwater system is underway to identify what contaminants may be present in the system.

Response to the spill of hazardous materials is provided by the Poudre Fire Authority. Its hazardous materials unit responds to contain spills but is not involved in the final cleanup of a site once a spill is contained, as with contaminated soils. Although their role is limited to immediate response they also have enforcement capabilities under the fire code. It is interesting to note that definitions of hazardous materials differs between the fire code and federal programs (RECRA, SARA). Police Services can also provide enforcement against the dumping of hazardous waste.

Larimer County has three departments which have roles in management of hazardous materials. The county Natural Resources Department manages the landfill owned by jointly by Fort Collins, Loveland, and Larimer County. This county department coordinates efforts to deal with the small scale spilling and dumping of hazardous materials by citizenry. They provide a household hazardous waste drop off site at the local landfill, as well as providing public education on the topic. The county's Department of Health and Environmental Services deals with underground storage tanks and coordinates with the state on the removal of tanks and site remediation. The county's Emergency Management Agency is the repository of information required under SARA title III. This is the information on which industries use (store) over regulated amounts of particular hazardous substances. As industrial stormwater permits may be tied to SARA reporting requirements, this information can be useful to the stormwater manager. It may also have a place in tracking constituents found during stormwater monitoring.

Given the range of topics involved in hazardous materials management, it is extremely important for stormwater managers to identify who is already

involved and what their roles are. Only after the players are identified can their aid be solicited in a stormwater quality plans. Existing programs outside of the usual stormwater purview should be utilized not only to lighten the load of the stormwater manager, but to decrease regulatory redundancy. This will allow effort to be spent where it will do the most good, not in the generation of additional paperwork. Ultimately the improvement of stormwater quality, particularly in urban areas, will take the integration of many environmental programs from hazardous materials to habitat protection. Stormwater agencies will not be able to work independently in these areas and could certainly bust their budgets (not to mention other parts) going it alone.