

Nine Minimum Controls – No. 7

7.0 POLLUTION PREVENTION PROGRAMS TO REDUCE CONTAMINANTS IN CSOs

7.1 OVERVIEW

The City uses an interdisciplinary and wide-ranging approach to address the seventh minimum control measure, pollution prevention. The City's Pollution Prevention Program focuses on nonstructural approaches to prevent or intercept solids, floatables and other contaminants before they enter the combined sewer system.

The idea behind this minimum control measure is that pollution should be prevented or reduced at the source whenever possible in order to reduce the contaminants entering the combined sewer system, and thus the receiving waters via CSOs. The pollution prevention program is applied to reducing the overall mass of solids and floatables that enters waterways, thereby reducing the aesthetic problems and nuisances associated with this particular kind of waste stream. Pollution prevention programs are also aimed at preventing or intercepting certain less visible but equally objectionable contaminants before they enter the overflow stream. A final benefit of pollution prevention, particularly floatable control, is that by controlling trash and debris before they enter the combined sewer system, the City reduces the risk that trash will interfere with a regulator or flap gate – possibly causing a dry weather overflow.

Although this strategy does not reduce or eliminate the solids and floatables associated with sanitary sewage, it is intended to control the discharge of the considerable amounts of debris carried into the combined sewer system during rain storms. Even citizens who may not understand many of the issues involved with combined sewer overflows may be aware of trash and debris along the City's riverbanks and in the rivers. While their concerns may be specifically related to appearance and aesthetics of the streams, it may be possible to amplify their interest and cause a behavioral change.

Because the techniques involved in the Pollution Prevention Program are not "end of pipe" solutions, this control strategy is not associated with particular outfalls. It is applied community wide, and not just in combined sewer area. However, it is possible that the level of effort can be adapted for particular drainage areas to ensure that outfalls that are typically problematic receive more intensive efforts to relieve the problem. For example, the the City Street Department cleans downtown streets more frequently than streets in residential areas. The downtown area is more likely to accumulate more trash and debris on the streets and the downtown area is served primarily by combined sewers. So a more intense focus downtown is likely to yield a greater pollution prevention benefit.

Nine Minimum Controls – No. 7

While much of the Pollution Prevention Program focuses on physical activities and efforts such as trash collection, recycling, street sweeping and inlet cleaning, a vital part of the program is public education and involvement. The goals of educating the public about and involving them in the pollution prevention effort are to cause behavioral change in both short term and long term. A one-day riverbank cleanup may result in an increased awareness of the effect of throwing a pop bottle out of a car window. This could result in a long-term increase in recycling and a reduction in littering overall.

As part of the implementation of this minimum control measure, City programs that have been going on as part of routine city services for decades are being refocused and outcomes tracked. Also, many components of this pollution prevention program are also required under the City's Stormwater NPDES Phase II program. The emphasis on pollution prevention as part of both the CSO and stormwater programs provides opportunities to educate City departmental and other agency employees about the importance of their efforts to the City's compliance with this control measure.

7.2 POLLUTION PREVENTION ACTIVITIES

The City, through various departments, conducts a variety of routine and specialized pollution prevention activities:

- Street sweeping
- Leaf collection
- Trash collection and curbside recycling
- Yard waste pickup
- Great American Clean-Up/Riverbank cleanup
- Adopt-A-Greenway
- Trash collection in parks
- Neighborhood cleanup days
- Tire collection
- Household Hazardous Waste collection
- Hazardous spill response
- Inlet and Catch basin cleaning
- Industrial pre-treatment
- Dead animal pickup

Each of these programs, including scope, goals, expected benefits and measures, is detailed in Exhibit G-1. The City's curbside recycling program began in 1995. The Great American Clean-Up/Riverbank cleanup, Yard waste pickup and Neighborhood Cleanup days have been ongoing for at least the last 15 years. The Adopt-A-Greenway program began during the 1990s. All other of the above activities have been ongoing for the 20 years (more precise implementation dates

Nine Minimum Controls – No. 7

are not available). A Pet Waste Management Program is also under development and consideration.

7.3 PUBLIC EDUCATION AND PARTICIPATION

In addition to actually carrying out the programs listed above and described in the exhibits to this chapter, the City invests in an aggressive public education and outreach program to make citizens aware of the Pollution Prevention Program efforts and to encourage their involvement. The City employs a Public Information Officer and contributes funding, support and program guidance for an education specialist employed by the Allen County Partnership for Water Quality. The City also works closely with the Allen County Solid Waste District on the development and cross-promotion of pollution prevention and waste reduction programs.

The reason that the City invests so heavily in public education is because we believe that public awareness of water resource issues may result in public involvement in efforts to reduce the amount of solids, floatables and other pollutants entering the combined sewer system and thereby, the receiving waterways. Reducing litter in streets, properly disposing of leaves and household hazardous material, and paying attention to the kind of material being disposed of in toilets and storm sewer inlets, especially those in the combined sewer area, are all vital to the Pollution Prevention Program

The City's website (www.cityoffortwayne.org) includes information about the City-sponsored pollution prevention activities detailed in Exhibit G-1 of this chapter. The website also provides information about pollution prevention activities that may be conducted by other agencies or area businesses. While tire recycling events and hazardous waste disposal events sponsored by public agencies are held only sporadically during the year, the City's website give the names and locations of local businesses that recycle tires, oil, hazardous and other material. Most of these businesses charge a fee for accepting and handling these items. The Allen County Solid Waste District also publishes an annual Waste-Watcher newspaper insert and pays for television and radio advertising to promote the appropriate disposal of solid and hazardous waste.

The Partnership for Water Quality provides educational opportunities and materials to help citizens learn more about watersheds and water resource issues generally. The Partnership for Water Quality has created a variety of materials that are made available at the Partnership Office and through the City. The Partnership also hosts a booth at several annual community events such as the Three Rivers Festival, the Allen County Fair and Black Expo where educational materials are distributed. A list of available educational materials and samples may be found in Exhibit G-2.

Nine Minimum Controls – No. 7

In addition to providing information about programs, the City uses a variety of tools to educate citizens about the nature of the combined sewer system itself -- how it operates, why it exists and the efforts underway to better control overflows. The City's CSO Public Notification Program (see Chapter 8) is intended primarily to inform the public of the possible health and environmental effects of combined sewer overflows, to make them aware of when CSOs are occurring or are likely to occur, and to educate them about the City's efforts to manage CSO discharges in accordance with federal mandates. Although public notification does not reduce the frequency of CSO discharges or pollutant loads, such notice can reduce the potential risk of adverse health effects. CSO outfall locations are marked with signage including the telephone number for a Water Quality Hotline that provides information about the nature of CSO and whether overflows are occurring. While many of these efforts have been intended to meet federal program requirements, they are also intended to gain public confidence and demonstrate the City's sincere commitment to environmental stewardship.

The City has been actively committed to involving the public in making decisions about how pollution reduction in local waterways will be accomplished and providing updates on the status of established CSO control programs. A voluntary citizen-based Sewer Advisory Group meets bi-monthly to receive updates on the City's sewer operation and maintenance activities, progress in carrying out combined sewer capacity improvement projects and to give input on program priorities. The Sewer Advisory Group has been actively helping the City make decisions about its sewer utility operations since 1995.

7.4 PROGRAM EVALUATION

The goal of the Pollution Prevention Program is to use a combination of pollution prevention, reduction and management tools that will reduce the amount of pollution entering the combined sewer system. For each activity in the Pollution Prevention Program the City has established goals and methods for evaluating outcomes on an annual basis. Another goal is to expand the public's knowledge of the combined sewer system and its impact on rivers and streams and to increase public involvement in activities that may improve river quality.

The degree to which pollution prevention can reduce contamination of receiving water bodies through CSOs is unknown. In theory, the cost for each unit of pollution reduced through prevention should be lower than the cost to collect and physically treat the same unit at the CSO outfall. In some circumstances, however, source control measures sufficient to provide effective pollution control over a diffuse area could be more costly than control measures at CSO outfalls.

Nine Minimum Controls – No. 7

The effectiveness of pollution prevention efforts is sometimes difficult to ascertain. Water quality sampling is only one measure of an effective pollution prevention program. Another water quality based measure is how citizens feel about the cleanliness of the environment including rivers and streams. Effectiveness can also be measured in terms of the number of people involved in activities that may have a pollution prevention outcome – tons of material recycled, number of volunteers participating in the Great American Clean-Up or the number of people who drop-off material during the annual Household Hazardous Waste collection day.

Even in cases where pollution prevention measures provide limited tangible benefits, they may have two important ancillary benefits. Reductions in the quantity of pollutants entering the combined sewer system will reduce the City's operation and maintenance on any overflow control that may be implemented as part of a CSO control program. In addition, public participation in pollution prevention activities will serve to heighten awareness of CSO issues and may increase public support for the overall program.

7.5 RECORD KEEPING

The Pollution Prevention Program relies on the on-going activities of a variety of City Departments and some outside agencies. Each department or agency is aware of their role in the Pollution Prevention Program and the requirement that they track certain data to be compiled on an annual basis.

The City's Planning and Design Services Department is responsible for collecting relevant data from each department or organization annually. He or she will annually summarize information related to each pollution prevention activity which will be kept at Exhibit G-3. A sample format for the summary may be found at Exhibit G-3.

Nine Minimum Controls – No. 7

DIRECTORY FOR APPENDIX G (Items Presented in Order of Appearance in Appendix G)

<u>Item</u>	<u>Description</u>
Exhibit G-1	POLLUTION PREVENTION ACTIVITIES - DETAILS
Exhibit G-2	LIST OF AVAILABLE EDUCATIONAL MATERIALS AND SAMPLES
Exhibit G-3	ANNUAL REPORT OF POLLUTION PREVENTION ACTIVITIES

Nine Minimum Controls – No. 7

EXHIBIT G-1

Polution Prevention Activities - Details

Program Name: STREET SWEEPING

Responsible Party: Fort Wayne Street Department under the direction of the Street Commissioner

Description of Activity, Scope and Expected Benefits:

Street sweeping reduces the amount of debris entering the combined and storm sewers by collecting it before it has the opportunity to wash into a catch basin or inlet. This control is highly applicable to developed and established urban areas with curbed streets and stormwater collection facilities. In addition to collecting trash and debris – potential floatables – street sweeping reduces grit and heavy metals that can easily be transported to receiving streams through overflows.

The goal of the street sweeping program in Fort Wayne is to sweep each City street at least four times per year. Fort Wayne uses vacuum sweepers that have higher efficiency than mechanical sweepers. The City is divided into five street sweeping areas. During daytime hours, one street sweeper is assigned to each of four quadrants. Each quadrant has a predetermined route and streets are swept according to that route. One street sweeper and operator is assigned to the third shift. Overnight when traffic and parking are reduced, this sweeper cleans streets in the downtown area Sunday thru Thursday night. Arterials are swept as time permits and as sweepers are traveling to residential areas. Sweepers also respond as needed to clean up glass and debris on arterials. Currently concrete and asphalt alleys are not swept as part of regular street sweeping routes but are swept on a request basis. Streets are swept spring, summer and fall. City Street Dept sweeps approx 16,000 curb miles per year spending 1,200 staff hours.

During the summer months – April through September – a two-person team (Clean Team) uses a sidewalk sweeper to clean alleys, sidewalks and streets of solid and floatable material and to beautify the downtown area.

Goals:

- Sweep each City street at least four times per year
- Sweep 16,000 curb miles per year
- Respond as requested to clean up glass and debris on arterials
- Sweep concrete and asphalt alleys as requested

Measures:

- Number of times each street is swept
- Number of curb miles swept each year
- Tonnage of material collected by the sweepers
- Debris collected by the Clean Team:
(This is counted in terms of number of 33-gallon trash bags filled)

Polution Prevention Activities - Details

Program Name: LEAF COLLECTION

Responsible Party: Fort Wayne Street Department under the direction of the Street Commissioner

Description of Activity, Scope and Expected Benefits:

The City's Street Department operates a neighborhood leaf collection program annually from mid-October through mid-December. The City is divided into three areas, north, central and south, and leaf collection crews spend three weeks in each area on a rotating basis. The program is intended to remove the majority of leaves from residential neighborhoods in a timely manner so that they will not accumulate over catch basins and inlets. Clogged inlets are a major contributor to street flooding. Leaf removal is important to keep leaves and leaf debris from entering the combined sewer system and possibly interfering with regulator or flap gate operation. From a public safety perspective, dry leaves on an unimproved street may contribute to fires if cars are parking over piles of leaves, and wet leaves can make it difficult for cars to brake effectively.

Much of the effectiveness of the program depends on public involvement. Residents receive utility bill stuffers notifying them of the dates when leaf crews will be in their area of the City. Residents are asked to rake their leaves to the curb but not into the street during the week when leaf collection crews will be in their area of the City. Leaves may also be placed in biodegradable yard waste bags and placed at the curb. Street Dept crews use front-end loaders to collect the leaves, placing them in dump trucks for transport to the city's yard waste recycling facility. In some areas, particularly areas with unimproved streets, leaf vacuums are used to collect leaves. A street sweeper also follows each leaf collection crew.

The effectiveness of leaf collection as a pollution prevention activity is somewhat difficult to measure. Measuring tons of leaves doesn't quite suit since tonnage depends on the fullness of trees. Tonnage also depends on whether the leaves collected are wet or dry and on whether the snow removal interferes with completion of leaf collection.

Goals:

Complete leaf collection

Measures:

Leaf collection completed

Polution Prevention Activities - Details

Program Name: TRASH COLLECTION AND CURBSIDE RECYCLING

Responsible party: Fort Wayne's Solid Waste Department through its trash collection contractor National Serv-All

Description of activity, scope and expected benefits:

The City of Fort Wayne employs a private firm to collect trash/garbage on a weekly basis. The same company provides curbside recycling on the same day as trash collection but on a bi-weekly basis. Each household is provided with two 18-gallon recycling bins – one for newspapers, magazines, catalogues, cardboard, fiberboard and phonebooks – the other for glass, plastic and metal recyclables.

The City's contractor also collects bulky items including heavy furniture and non-Freon appliances if they are placed with the trash/garbage either at the curb or in the alley. Items that cannot be placed for collection by the contractor include tires, hazardous waste, large amounts of construction and demolition debris (over 60 pounds per week) and Freon appliances.

The effectiveness of trash collection and recycling programs is dependent upon the level of public participation. For citizens to participate the programs must be clearly communicated, convenient and low cost. Fort Wayne's Solid Waste Department provides on-going education for the community concerning trash collection and recycling. The City's website (www.cityoffortwayne.org) includes an extensive section that details material that can be recycled as well as information about proper disposal of unusual items such as Freon appliances, asphalt, batteries, computer equipment, fluorescent bulbs, hazardous waste, paint and tires that cannot be recycled or collected by the city's trash hauler. The City encourages private collection companies to keep charges for collecting these materials as reasonable as possible to discourage illegal dumping

In addition to website, other public information/education programs include:

- Annual utility bill stuffers outlining what can be recycled;
- Mailers to newly annexed residents about trash collection and recycling;
- Cooperative efforts with the Allen County Solid Waste District to distribute information about what can be recycled and options for disposal of material that cannot be recycled or placed in the trash;
- Presentations to schools regarding recycling;
- Information at community events such as the Home and garden Show;
- Magnets mailed to homes designating them as either week "A" or week "B" recyclers along with phone numbers to call for more information.

Convenient programs for trash disposal and recycling can result in less trash and debris being dumped in remote areas or along streambanks. Another expected benefit of an effective trash and recycling program is an increase in the tonnage of recycled material collected and a reduction in street trash and litter that can eventually make its way into the combined sewer system. Beginning in 2006, every homeowner will receive a garbage cart to be used to hold trash and garbage when it is placed out for collection. Use of the carts should eliminate the possibility of bags breaking on the street or being torn open and spilling. This should further reduce the amount of trash on City streets.

Polution Prevention Activities - Details

Goals:

Create a convenient and well-understood trash and recycling collection program

Measures:

Tons of material recycled per year

Number of educational programs presented

Polution Prevention Activities - Details

Program Name: YARD WASTE RECYCLING

Responsible party: City of Fort Wayne through its trash collection contractor National Serv-All and at the Biosolids Handling Facility

Description of activity, scope and expected benefits:

Yard waste, except leaves, can be placed with the garbage for collection all year long by the City's trash collection contractor. Grass clippings may be bagged in plastic bags or placed in refuse containers. Biodegradable yard bags may also be used. Branches will be collected and there is no limit on the amount so long as they are prepared appropriately

One City operated site and one private site are also available for yard waste disposal. The City operated a yard waste recycling facility accepts leaves, garden waste, purnings, vines, grass clippings and brush. There is a small charge for disposal at both sites. Construction debris, wood fencing, tires and garbage are NOT accepted at either site.

The City's site also makes mulch, recycled lime sludge and recycled sewage biosolids available for pickup by citizens.

The Fort Wayne Solid Waste Department and Allen County District work to encourage property owners to mulch grass clippings rather than put them out for collection.

Goals:

Increase public awareness of options for recycling yard waste
Increase tonnage of yard waste collected at drop-off sites

Measures:

Tons of yard waste collected at recycling sites

Polution Prevention Activities - Details

Program Name: GREAT AMERICAN CLEAN-UP/RIVERBANK CLEANUP

Responsible party: Fort Wayne's Solid Waste Department

Description of activity, scope and expected benefits:

The Great American Cleanup in Fort Wayne is a one-day per year event that is focused on cleaning up the community. Fort Wayne's Solid Waste Management Department recruits and organizes several thousand volunteers, matching volunteer groups specific clean up projects or areas. Activities include neighborhood trash and debris removal, used tire collections, and riverbank cleanups. Items collected include furniture, appliances, plastic bottles, tires, Styrofoam and other trash. The event also includes a litter prevention education program and is organized in conjunction with Keep America Beautiful, Inc. The City also recruits sponsors for the event whose contributions help to pay for gloves, trash bags and flower seeds that are provided to the volunteers. Tee shirts are also provided to volunteers so they have an on-going reminder of the project they carried out and an incentive to carry on litter prevention activities throughout the year.

Riverbank cleanup activities and the removal of litter and debris from neighborhoods and streets reduces the amount of these materials that are likely to make their way into the combined sewer system and thus into Fort Wayne's rivers. The litter prevention education that goes on as part of the Great American Cleanup program can help to increase awareness of the problems caused by litter.

Goals:

Recruit volunteers to carry out cleanup projects identified by the Solid Waste Department
Educate volunteers on the importance of reducing litter throughout the year
Reduce trash and debris on streets, in neighborhoods and along riverbanks

Measures:

Number of volunteers
Number of sites/projects
Tons of trash/debris collected

Polution Prevention Activities - Details

Program Name: ADOPT-A-GREENWAY

Responsible party: Fort Wayne Department of Parks and Recreation

Description of activity, scope and expected benefits:

The Fort Wayne Department of Parks and Recreation manages the Rivergreenway Trail, a 15.5 mile long linear park along the banks of the St. Mary's, St. Joseph and Maumee Rivers in Fort Wayne. In addition to providing a limited access park that is ideal for walking, running, rollerblading and bicycling, the Rivergreenway offers natural vistas and scenic overlooks within an urban environment. The greenway also creates a natural area to accommodate overflow from the rivers during periods of high water and flooding.

The Adopt-A-Greenway program to help keep Fort Wayne's Rivergreenway Trail maintained. Organizations agree to adopt a two-mile section of the Greenway and to clean their section of the trail three times a year. In exchange for a group's assistance, a sign is placed along their section recognizing the group. The program helps to keep trash and debris from entering the adjacent rivers. In addition, the Fort Wayne Parks and Recreation Department website provides a way for greenway users to notify the Parks Department of problems along the greenway that may be in need of clean up or repair.

Goals:

Increase awareness of the benefits of the Rivergreenway
Increase the number of organizations participating in the Adopt-A-Greenway Program

Measures:

Number of participating organizations
Number of cleanups per year
Number of volunteers

Polution Prevention Activities - Details

Program Name: TRASH COLLECTION IN PARKS

Responsible party: Fort Wayne Department of Parks and Recreation

Description of activity, scope and expected benefits:

The Fort Wayne Department of Parks and Recreation collects trash and empties trash cans and dumpsters in all 84 of Fort Wayne's parks at least daily. The department owns and uses its own trash collection truck to perform collections.

While the primary goal of the Parks trash collection program is to project an image that the parks are clean and safe places for children to play, pollution prevention is an ancillary benefit. The majority of Fort Wayne's parks are located adjacent to one of the City's three rivers or they contain open drains or small streams. Regular trash collection helps to keep trash and other contaminants from directly entering waterways and also reduces the amount of debris that may enter the combined sewer system from the parks that are located in the combined sewer area.

Goals:

Empty trash cans in parks every weekday

Measures:

Trash cans in parks are emptied every weekday

Polution Prevention Activities - Details

Program Name: NEIGHBORHOOD CLEANUP DAYS

Responsible party: Fort Wayne Division of Community Development and Fort Wayne Solid Waste Department

Description of activity, scope and expected benefits:

The Division of Community Development uses funds from the Community Development Block Grant program to help fund neighborhood cleanups from April through October of each year. The program aims to help clean up poorly maintained, vacant lots, alleys and individual properties. Neighborhoods must meet certain income eligibility guidelines in order to qualify for the program, and the majority of the income eligible neighborhoods are located within the City's combined sewer system area.

Community Development offers each eligible neighborhood an opportunity to schedule two clean up days per year. The City provides roll-off dumpsters and removal. Items that may be collected and disposed of include trash, construction debris and yard waste. This program helps to remove trash and other debris that might otherwise find its way into the combined sewer system and into waterways as pollution. By providing a convenient way to dispose of construction debris, this program makes it less likely that such material will find its way into a catch basin, possible interfering with a flap gate or regulator and causing a dry weather overflow. Keeping construction debris out of sewer lines also helps to maintain the capacity of the sewer system.

The Solid Waste Department offers a similar program in neighborhoods that do not meet the CDBG eligibility guidelines.

Goals:

Organize as many cleanup days in neighborhoods and funding and resources allow

Measures:

Number of neighborhoods participating
Number of clean-up days held per year
Tons of material collected

Polution Prevention Activities - Details

Program Name: WASTE TIRE DISPOSAL

Responsible party: Allen County Solid Waste District, Fort Wayne Community Development Division

Description of activity, scope and expected benefits:

Very few products are considered to be worn out when they are only 5% used – except tires. Used tires are a constant solid waste problem. Because there is often a cost to dispose of or recycle tires, they often find their way into rivers and streams. Along river and stream banks, dumped tires become breeding grounds for many pests including mosquitoes, which may carry diseases that are harmful to humans.

Within the Fort Wayne area, two programs offer alternatives to dumping or stockpiling waste tires. Each year the Allen County Solid waste District sponsors a Tire Amnesty Day on one Saturday in October when residents may drop off tires at a designated location for recycling. A minimal fee is applied.

As a way to encourage neighborhood associations to remove tires that may accumulate in residential areas, the City's Division of Community Development conducts a tire disposal program. Neighborhoods that register may bring tries to a drop-off location. The tires will be hauled away and disposed of by the City. The City pays the neighborhood association a small amount per tire. This program is intended to provide a cash incentive for neighborhood clean up and to make tire disposal more convenient for organized groups.

Many tire dealers will dispose of old tires for a small fee.

Goals:

Provide convenient tire disposal options to discourage dumping

Measures:

Number of tires collected through established collection programs

Polution Prevention Activities - Details

Program Name: HOUSEHOLD HAZARDOUS WASTE COLLECTION
(TOX-AWAY DAY)

Responsible party: Allen County Solid Waste Department

Description of activity, scope and expected benefits:

Illegal disposal of household hazardous wastes can introduce waste oil and a multitude of toxic materials to the combined sewer system – whether these materials are dumped down a sink, floor drain or toilet or poured into a catch basin.

In order to reduce the likelihood that these materials will enter the combined sewer system, the Allen County Solid Waste District gives residents an opportunity to safely dispose of various hazardous and toxic household products. “Tox-Away Day” is held annually in a designated location. Allen County residents may drop off a limited amount of material at no charge. The event is well publicized via television, radio and newspaper advertising. Because it is typically held around the same time each year and because this has been an on-going program for more than 15 years, area residents look forward to the event and store material for drop off.

The City of Fort Wayne participates in the event by helping to publicize it through utility bill stuffers, notices of the government access television station and on the City’s website. The City’s website also provides information on companies that participate in various hazardous waste collection programs throughout the year.

Goals:

- Increase awareness of Tox-Away Day
- Increase number of participants
- Increase amount of material collected

Measures:

- Number of participants
- Weight of various material collected

Polution Prevention Activities - Details

Program Name: HAZARDOUS SPILL RESPONSE TEAM

Responsible party: Fort Wayne Fire Department, Allen County Emergency Management Department, Allen County Solid Waste district

Description of activity, scope and expected benefits:

The Fort Wayne Fire Department's Hazardous Materials Team is made up of 36 members trained to the requirements of the National Fire Prevention Act, Technician level. The team responds to spills and incidents involving hazardous materials within the City of Fort Wayne and throughout Allen County and has mutual aid agreements with several surrounding communities.

The technicians are trained to entry into various hazardous environments and are capable of performing a variety of tasks. Assignments may include: recognizing and identifying hazardous materials, monitoring hazardous atmospheres, containment or confinement of a hazardous material spill or leak, use of absorbing material, pressurized container leaks, highway transportation and railroad tank car accidents. The Allen County Emergency Management Department keeps records of all hazardous material incidents in the County.

The Allen County Solid Waste District has staff trained to assist with managing mercury spills and has monitoring equipment that can be used in mercury detection.

Many hazardous material incidents – particularly those with the potential for an especially large amount of material to enter a waterway – involve traffic accidents. If these accidents happen in a combined sewer area, the possible risk of entry into the combined sewer system is great, particularly if rainy conditions have contributed to the accident. Incidents involving smaller spills of highly hazardous material (for example mercury) may occur in less public places such as dentists' offices or school laboratories. Many times, those ignorant of appropriate containment and clean up procedures flush the hazardous material directly into the combined sewer system by washing the material down a drain or pumping it into a toilet.

Having a trained Hazardous Spill Response Team and other trained agencies in Fort Wayne provides for quick response to incidents that could potentially lead to widespread hazardous contamination of the community's rivers. Increasing awareness through public education programs will ensure that people in the community know there are resources available to assist with hazardous material spills. In this way, we hope to reduce the number of spills that are simply washed down the drain.

Goals:

Increase awareness of how to respond to a hazardous material emergency
Increase consumer knowledge of what constitutes a hazardous material

Measures:

Number of Hazardous Material responses
Reduce number of incidents where hazardous material is found in a sewer or water body.

Polution Prevention Activities - Details

Program Name: CATCH BASIN CLEANING

Responsible party: Water Pollution Control Maintenance/Stormwater Maintenance

Description of activity, scope and expected benefits:

Frequent removal of accumulated catch basin deposits is a method often proposed in CSO control programs to reduce the heavy “first flush” effect of deposited solids that is transported by stormwater flow through the combined sewer system. A regular cleaning program also helps reduce the buildup of sediment in the catch basins and increases the likelihood that debris can be removed from the system before it can contribute to a dry weather overflow. Although not a pollution prevention or regulatory outcome, cleaner catch basins mean that water is more likely to drain from the streets more quickly, thereby reducing the number of street flooding calls to the City during wet weather events.

Fort Wayne’s Water Pollution Control Maintenance Department assigns two vactor trucks to the program of regular, scheduled catch basin cleaning. One vactor is assigned to the northern half of the City and one to the south half. The goal of the program is to clean every catch basin and inlet every 2.5 years or approximately 31 structures per day. The material removed from catch basins and inlets is weighed daily. The same vactor trucks and crews also respond to a variety of other needs, so vactor trucks may be called off the cleaning routes as needed for other work.

Catch basins are also cleaned in response to complaints of street flooding and odor.

Goals:

Clean each of the City’s 15,500 known structures every 2.5 years

Measures:

Frequency of cleaning
Tons of material removed

Polution Prevention Activities - Details

Program Name: INDUSTRIAL PRE-TREATMENT

Responsible party: Industrial Pretreatment Section, Water Pollution Control Plant

Description of activity, scope and expected benefits:

The Industrial Pretreatment Section of the Fort Wayne Water Pollution Control Plant is responsible for the oversight of significant industrial users, contract customers and non-major dischargers. Each of these dischargers is monitored at strategic sampling points four times each year to ensure that dischargers are complying with concentration limits placed on a variety of toxic ions, compounds and other substances entering the combined sewer system. In addition to monitoring discharges as outlined in industrial pre-treatment permits, the IPS also ensures that dischargers comply with limitations determined by their Standard Industrial Classification (SIC) code.

The IPS also reviews development plans to determine if new users of the sewer system should be required to install control manholes or sand, oil or grease traps. Based on monitoring results or complaints, the IPS employees will work with individual industries or businesses to find ways to reduce their discharge concentrations to within acceptable limits. The IPS staff members also perform facility audits on each of the discharging Significant Industrial Users within the City of Fort Wayne and outlying areas served by the Fort Wayne Water Pollution Control Plant.

As part of the effort to reduce the amount of grease collecting within sewer pipes that may reduce pipe capacity, the industrial pre-treatment program conducts a restaurant monitoring program involving compliance checks for oil and grease at restaurants that discharge into established sewer line degreasing zones.

An effective industrial pretreatment program will help to ensure that effluent from the Water Pollution Control Plant meets or is better than the limits set in the City's NPDES permit. The program helps to limit heavy metal concentrations in sewage treatment residuals (biosolids) and helps to protect the quality of the City's three rivers by monitoring and reducing the amount of pollution that may enter the rivers through the combined sewer system.

Goals:

- Increase sampling and inspection at restaurants in areas requiring the most sewer degreasing
- Review all building permit applications for compliance with separator and control manhole requirements
- Collect and test samples from industrial and wholesale sewer customers
- Conduct SIU compliance, inspection and monitoring programs

Measures:

- Rate of non-compliance for categorical SIUs and non-categorical SIUs
- Number of facility audits performed
- Number of samples collected (at least four per year for each industrial and wholesale customer)
- Number of restaurant compliance checks
- Number of building permits reviewed

Polution Prevention Activities - Details

Program Name: DEAD ANIMAL PICKUP

Responsible party: Fort Wayne Street Department

Description of activity, scope and expected benefits:

In an urban area, it is inevitable that vehicular traffic will occasionally cause the death of wild animals or pets that venture into the street. Fort Wayne provides two options for the removal and disposal of dead animals. The Fort Wayne Street Department provides collection of dead animals as they are found by Street Department crews who are doing other work or when reported by citizens. Dead animals may also be disposed of at the shelter operated by the City's Department of Animal Care and Control.

By providing a program to remove animal carcasses, the City reduces the likelihood that dead animals will be disposed or washed into catch basins, and possibly into the combined sewer system. This not only reduces the pathogens that may enter the system from dead animals, but also reduces the possibility that this kind of debris will cause a regulator or flap gate malfunction.

Goals:

Respond to complaints of dead animals by removing them within 24-hours.

Measures:

Number of calls receiving responses

Number of animals collected

Polution Prevention Activities - Details

Program Name: PET WASTE MANAGEMENT

Responsible party: Partnership for Water Quality

Description of activity, scope and expected benefits:

Fort Wayne City Code contains provisions requiring persons responsible for animals to immediately remove animal excrement from public lands or the property of others. City Code pertaining to the use of City Parks requires that pet owners carry with them proper paraphernalia for removing pet waste from parkland.

Pet feces and litter can introduce organic contamination, nutrients and bacteria into the combined sewer system when these wastes are washed off yards or parklands.

By educating citizens about the contamination that may be caused by pet waste, and by providing information about the legal requirements to clean up after pets, the City may be able to reduce the amount of bacteria and nutrients that enter the rivers through the combined sewer system.

Goals:

Implement a public education program on pet waste

Measures:

Public education material created and distributed

Nine Minimum Controls – No. 7

EXHIBIT G-2

List of Available Educational Materials and Samples

Flyers

Available from Partnership for Water Quality
3718 New Vision Drive, Fort Wayne
and on the Partnership Website at www.acwater.org

Combined Sewer Overflow – A Reference Guide for Homeowners
Green Landscaping
Household Hazardous Waste
Stormwater Pollution
Drinking Water in Your Community
West Nile Virus
Stormwater Activity Book

Available from City of Fort Wayne
One East Main Street, Room 200
Fort Wayne, Indiana

Combined Sewer Overflows
Dealing With Flood and Sewer Waters
Step-by-Step Downspout Disconnection Guide
Biosolids Use and Reuse

Available from the Allen County Solid Waste District
449-7878
www.acwastewatcher.org

Waste Watcher Recycling Guide

Nine Minimum Controls – No. 7

EXHIBIT G-3

Annual Report of Pollution Prevention Activities

Fort Wayne Pollution Prevention Program Annual Report for 200__

Pollution Prevention is an on-going program of the Fort Wayne Combined Sewer System Operational Plan. It focuses on nonstructural approaches to prevent or intercept solids, floatables and other contaminants before they enter the combined sewer system.

During the year 200____, the following activities were carried out with the following accomplishments:

Street Sweeping

Changes planned for 200__

- Conduct a community survey to find out how effective trash collection and street sweeping programs are based on overall “clean” score

Performance Measure(s)

- Times each street is swept 5 times _____%; 4 times _____%; 3times _____%
- Number of curb miles swept
- Tons of material collected
- Bags collected by Clean Team

Leaf Collection

Changes planned for 200__

Performance Measure(s)

- Percentage of collection completed on time

Trash Collection & Curbside Recycling

Changes planned for 200__

Performance Measure(s)

- Tons of material recycled
- Number of educational programs presented

Yard Waste Recycling

Changes planned for 200__

Performance Measure(s)

- Tons of yard waste collected

Great American Cleanup/Riverbank Cleanup

Changes planned for 200__

- Implement a community riverbank cleanup in the fall

Performance Measure(s)

- Number of volunteers
- Number of sites/projects
- Tons of trash/debris collected

Annual Report of Pollution Prevention Activities

Adopt-A-Greenway

Changes planned for 200__

Performance Measure(s)

- Number of participating organizations
- Number of cleanups per year
- Number of volunteers

Trash Collection in Parks

Changes planned for 200__

Performance Measure(s)

- Trash cans in parks emptied every weekday

Neighborhood Cleanup Days

Changes planned for 200__

Performance Measure(s)

- Number of neighborhoods participating
- Number of clean-up days held
- Tons of material collected

Waste Tire Disposal

Changes planned for 200__

Performance Measure(s)

- Number of tires collected

HHW Collection – Tox-Away Day

Changes planned for 200__

Performance Measure(s)

- Number of participants
- Weight of material collected

Hazardous Spill Response Team

Changes planned for 200__

Performance Measure(s)

- Number of times hazardous material is found in sewer or waterbody
- Number of Haz Mat responses

Catch Basin Cleaning

Changes planned for 200__

Performance Measure(s)

- Frequency of cleaning
- Tons of material removed

Industrial Pre-Treatment

Changes planned for 200__

Performance Measure(s)

Annual Report of Pollution Prevention Activities

- Rate of non-compliance for categorical SIUs
- Rate of non-compliance for non-categorical SIUs
- Number of samples collected
- Number of restaurant compliance checks
- Number of building permits reviewed

Dead Animal Pickup

Changes planned for 200__

Performance Measure(s)

- Number of called responded to
- Number of animals collected

Pet Waste Management

Changes planned for 200__

- Increase public education on pet waste disposal – develop a brochure and distribute through veterinarians' offices

Performance Measure(s)

- Public education material created and distributed

Public Education

Changes planned for 200__

Complete community education plan for Mercury and implement

- Employee training
- Bill stuffers
- Web page
- Community presentations (4)

Performance Measure(s)

- Public information material created
- Public information material distributed
- Public presentations given