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December 10, 2020

Attention: Construction Association of Nova Scotia, Landscape Nova Scotia, Nova Scotia Home Builders Association and Nova Scotia Road Builders Association

#### RE: Prohibited Discharge to Stormwater Catchbasins

We are writing to Associations involved in the construction industry to advise of a recent influx of issues related to discharge of sediment laden water into Halifax Water owned stormwater catchbasins. Construction activities accelerate erosion dramatically, mainly by exposing large areas of soil to rain and running water. If this runoff is not prevented or not properly treated, it results in silty water entering Halifax Water's stormwater system and siltation of downstream watercourses.



Stormwater systems (including catchbasins and underground pipes) are intended to carry only rainwater and snowmelt directly to local watercourses.

In addition to sediment and soil, construction materials such as **concrete ingredients**, **aggregate wash**, **drywall compounds and landscaping/construction runoff** contain fine material that can have a direct impact on stormwater quality. These materials also accumulate in the stormwater system and may cause operational issues such as blockages, which affect the stormwater system's capacity and can lead to property flooding. Other products such as **pesticides**, **paints**, **adhesives**, **solvents**, **oils**, **fuels and fluids from vehicles and heavy equipment**, all contain contaminants that must be disposed of properly.

As an Association for industry professionals, we urge you to discuss these issues with your members to ensure that suggested best management practices (attached) are followed to prevent sediment, soil and other harmful products from entering the stormwater system.



December 10, 2020 Page **2** 

Common issues that Halifax Water Pollution Prevention staff observe on construction sites include:

- Streets, sidewalks and driveways are not swept of sediment and debris often enough;
- Topsoil piles in the street or driveways that are not covered during rain events;
- Topsoil debris from sod pallets not being swept up;
- Vehicle trackout control measures not in place or maintained; and
- Other Erosion and Sediment (E&S) control measures that have not been installed or maintained. For example, a common observation is that exposed soil areas on building sites are not covered (or adequately covered) to prevent them from eroding and silty water being carried into the street and storm system.

Erosion prevention must be the primary focus of all E&S control plans. Whereas sediment control should be considered the contingency plan. In particular, filter fabric in catchbasins should not be relied upon as a replacement for properly designed, installed and maintained E&S control on building sites. It is also important to note that filter fabric alone is not capable of removing finer sediments from stormwater.

It is prohibited under Halifax Water's Rules and Regulations, as well as under the *Nova Scotia Environment Act*, to allow the discharge of sediment laden water or other pollutants into a stormwater system or the environment. Halifax Water Pollution Prevention staff periodically visit active construction sites to monitor discharges to the stormwater system and confirm erosion prevention measures are in place.

Please contact Maria Joudrey, Engineering Technologist at 902-478-4791 or <u>mariaj@halifaxwater.ca</u> if you have any questions or comments regarding this letter.

Halifax Water appreciates your cooperation in this matter.

Kenda MacKenzie, P.Eng. Director of Regulatory Services

Attachments: Best Management Practices







# **Suggested Best Management Practices**

### Planning the Project

- Develop an Erosion and Sediment Control Plan to ensure the proper controls are in place onsite and in the street to protect catchbasins;
- Develop a Spill Prevention and Response Plan to address the storage and handling of potential pollutants;
- Train and Educate employees in good housekeeping, spill prevention and control, erosion and sediment control, and materials management; and
- Apply early for a Construction Dewatering Permit from Halifax Water to prevent delays.

#### Housekeeping

- Ensure that erosion and sediment control measures are properly designed, installed and maintained at all times;
- Provide appropriate containers for the proper disposal of garbage, construction debris, recyclables, hazardous materials and other wastes, and schedule regular pickup times;
- Store materials on concrete or asphalt pads, in enclosed buildings or with a tarp or awning;
- Cover topsoil piles before rain events;
- Close waste containers at all times and secure lids when the site will be unoccupied;
- Sweep up dust and debris from driveway, sidewalk, street and gutter areas;
- Use tarps or drop cloths for mixing areas; and
- Implement and maintain "Track Out" control.

## **Preventing Contaminated Runoff**

- Protect applications of fresh concrete and mortar from rainfall and runoff;
- Clean equipment (e.g., cement trucks) on the building site and prevent wash water from entering the street;
- Collect water and sediment from cleaning activities in a spill tray, drip pan, wheelbarrow, or another form of containment;
- Keep spill containment equipment in an accessible location on site and report to Halifax Water (at the number below) any accidental spills that reach the storm system; and
- Have regular Toolbox Talks with employees to discuss the importance of erosion and sediment control measures.