

**APPENDIX D**  
**STATUTORY MATRIX OF LOCAL GOVERNMENT OPERATIONS**  
**AND ASSOCIATED ACTIVITIES<sup>1</sup>**

OPERATION	ENVIRONMENTAL STATUTES <sup>2</sup>										
	CWA	CAA	CERCLA	EPCRA	FIFRA	RCRA	TSCA	SDWA	NEPA	ESA	RHA
<b>3.3 CONSTRUCTION/PROPERTY MANAGEMENT</b>											
<b>3.3.1 General Activities</b>											
1. Zoning issues 2. Coordination of activities (e.g., BMPs) across local governments 3. Planning and design (apply EMS concept) 4. Monitoring contractors	<i>Although there are no specific federal requirements, these activities can affect the significance of the environmental impacts associated with local government operations. When conducting these activities, the local government should consider the potential environmental impacts.</i>										
<b>3.3.2 Roads/Bridges/Tunnels</b>	U	U	U	U		U			U	U	U
<b>3.3.2.1 New Construction</b>	U	U							U	U	U
Clearing and grading activities	U									U	U
Storm water management (e.g., stream stabilization) Erosion and sediment (E&S) control	U										
Dredging (wetlands)	U										
Road spoils/debris disposal (if hazardous)						U					
Redoing utility (power, gas, sewer) lines (in wetlands)	U										
New construction (roads)		U				U					
Fly ash in concrete (hazardous wastes mixed in asphalt/concrete)						U					
Laying asphalt		U									
Recycling asphalt (make up mineral content by adding shredded glass, slag); VOCs from asphalt		U									

<sup>1</sup> This matrix may include some activities that are not specifically discussed in Chapter 3.

<sup>2</sup> This table indicates whether federal requirements may apply. Even if federal requirements do not apply, state requirements may apply. The local government needs to be aware of state requirements.

OPERATION											
	CWA	CAA	CERCLA	EPCRA	FIFRA	RCRA	TSCA	SDWA	NEPA	ESA	
New construction (curbs and sidewalks)		U	U	U							
Concrete laying Chemicals used to harden sidewalks		U	U	U							
Noise abatement	<i>No specific federal regulatory requirements.</i>										
Dust control						U					
<b>3.3.2.2 Maintenance and Renovation</b>	U	U				U					
Street sweeping	U										
Maintaining storm sewers and impoundments	U	<i>See Section 3.7—Wastewater Management.</i>									
Salt application and removing snow	U										
Painting (e.g., guardrails) Removing and disposing of lead-based paints		U				U					
<b>3.3.2.3 Traffic Management</b> Design (e.g., painting, speed bumps, yield signs preferable to stop signs)		U <sup>3</sup>				U					
Modeling air pollution		U <sup>3</sup>									
Traffic boxes Old batteries (e.g., replace Pb batteries with solar packs)						U					
<b>3.3.3 Buildings</b>	U	U	U	U	U	U	U				
<b>3.3.3.1 New Construction</b>	<i>See New Construction under Section 3.3.2—Roads/Bridges/Tunnels.</i>										
<b>3.3.3.2 Maintenance and Repair</b>	U	U	U	U	U	U					
Monitoring indoor air quality	<i>No specific federal regulatory requirements.</i>										
Boiler operations (hazardous waste fuels, used oil for fuel)	U	U	U	U		U					
Cooling systems/CFCs		U	U	U							
Pesticide application	<i>See Section 3.4—Pesticide/Vector Management.</i>										
Energy conservation issues	<i>No specific federal regulatory requirements.</i>										

<sup>3</sup> Under State Implementation Plan.

OPERATION											
	CWA	CAA	CERCLA	EPCRA	FIFRA	RCRA	TSCA	SDWA	NEPA	ESA	
Fluorescent bulbs	<i>No specific federal regulatory requirements.</i>										
Mercury-containing bulbs						U					
Mercury-thermostat (covered under Universal Waste rule)						U					
Parking lots/storm water management	U										
Chemical storage/hazardous materials management (e.g., paints, solvents)		U	U	U							
Management of generated wastes	U					U					
Food wastes (school cafeterias)	U										
Laboratory/medical wastes (schools, coroner's office, police department)	U					U					
Laundry (jails)	U					U					
Furniture finishing (jails)	U					U					
<b>3.3.3.3 Renovation and Demolition</b>	U	U				U	U				
Building dewatering/contaminated groundwater	U										
Demolition wastes Pressure-treated wood						U					
Asbestos		U					U				
Lead-based paint		U				U					
<b>3.3.4 Outdoor Recreation Facilities (including stadiums and golf course)</b>	U	U	U	U	U	U	U				
<b>3.3.4.1 New Construction</b>	<i>See New Construction under Section 3.3.2—Roads/Bridges/Tunnels.</i>										
<b>3.3.4.2 Facility Maintenance and Renovation</b>	U	U	U	U	U	U	U				

OPERATION	CWA	CAA	CERCLA	EPCRA	FIFRA	RCRA	TSCA	SDWA	NEPA	ESA
Swimming pool Adjusting ozone, chlorine, and chemical composition Testing for and adjusting pH Maintaining and repairing filter systems, recirculation pipes, valves, fittings, and pumps (welding, brazing, fabricating) Operation of electrical and heating systems Solid waste management Backwashing filters, circulating water, and filter water Installing, maintaining, and repairing electronic control systems and timers Drainage issues (pretreatment program) Chemical storage/hazardous materials management (e.g., chlorine) Parking lots (storm water management)	U	U	U	U		U				
Stadium, playing field, and golf course Field maintenance Watering, fertilizing, resodding, pesticide spraying, mowing, aerification, soil sampling, overseeding, weed control Planting, pruning trees and shrubs Mowing fields, operating hydraulic mowers, lawn sweepers, forklifts, skidloaders, small tractors, self-propelled roller compactors, renovators, verticutters, top dressers, paint sprayers, aerifiers, sod cutters, rototillers, dump trucks, and motor sweepers Grading land and moving soil Pesticide management/IPM Landscaping/xeriscape Bio-retention facilities	U	U	U	U	U	U	U			

OPERATION											
	CWA	CAA	CERCLA	EPCRA	FIFRA	RCRA	TSCA	SDWA	NEPA	ESA	
Stadium, playing field, and golf course continued Food preparation and disposal Parking lots (storm water management) WWTP (used only on weekends) Cleaning stadium, buildings, and grounds Using cleaning chemicals Solid waste management	U	U	U	U	U	U	U				
<b>3.3.5 Vehicle/Equipment Maintenance</b>											
<b>3.4.1 Purchasing Pesticides</b> Purchasing proper amounts Selecting appropriate pesticides Determining shelf life											
<b>3.4.2 Applying Pesticides</b>	U				U						U
Mixing pesticides					U						
<b>3.4.2.1 Applying Pesticides Indoors</b>					U						
<b>3.4.2.2 Applying Pesticides Outdoors</b> Helicopters/tractor drives Maintaining green ways - herbicides/round up for right of way wild flowers	U				U					U	
<b>3.4.2.3 Cleaning Application Equipment</b>					U						
<b>3.4.2.4 Certifying Applicators</b>					U						
<b>3.4.2.5 Keeping Records</b>					U						
<b>3.4.3 Storing Pesticides</b>		U	U	U	U						
<b>3.4.3.1 Risk Management Planning (CAA Section 112(r))</b>		U		U							
<b>3.4.3.2 Notification of a Canceled or Suspended Pesticide</b>					U						

OPERATION	CWA	CAA	CERCLA	EPCRA	FIFRA	RCRA	TSCA	SDWA	NEPA	ESA
	<b>3.4.4 Disposing of pesticides</b>	U				U	U			
<b>3.4.5 Vehicle/Equipment Maintenance</b>										
<b>3.5.1 Emergency Planning</b>				U						
<b>3.5.1.1 Planning</b> Catastrophic events Flooded rivers (e.g., flood control)/debris management Solid waste debris management from catastrophes	<i>No specific federal regulatory requirements, but local governments participate in planning for and responding to these types of events. Check with the Federal Emergency Management Agency (<a href="http://www.fema.gov">http://www.fema.gov</a>).</i>									
<b>3.5.1.2 Providing Chemical Information to the Public</b>				U						
<b>3.5.2 Fire Protection and Emergency Response</b>	U	U		U		U				
<b>3.5.2.1 Fire Protection</b>	U	U		U		U				
<b>3.5.2.2 Emergency Planning</b>	<i>See Section 3.5.1—Emergency Planning.</i>									
<b>3.5.2.3 Fire Response and Suppression</b> Practicing Firefighting		U		U						
<b>3.5.2.4 Hazardous Materials Response</b> Generation of hazardous wastes Management and disposal of contaminated media	U					U				
<b>3.5.3 Police Protection</b>	U	U	U	U		U				
<b>3.5.3.1 Photoprocessing</b>	U	U				U				
<b>3.5.3.2 Firing Ranges</b>			U	U		U				
<b>3.5.3.3 Laboratory Operations (forensics, fingerprinting)</b>	U		U	U		U				

OPERATION	CWA	CAA	CERCLA	EPCRA	FIFRA	RCRA	TSCA	SDWA	NEPA	ESA
	<b>3.6.1 Collecting and Storing Municipal Solid Waste</b>	U								
<b>3.6.1.1 Collection</b> Yard materials, batteries, large appliances	<i>Federal guidelines, but no specific federal regulatory requirement.</i>									
<b>3.6.1.2 Storage Operation of Transfer Stations</b> Truck wash areas (e.g., spray units to clean bottom of trucks)	U									
<b>3.6.2 Recycling and Composting</b>		U	U	U						
<b>3.6.2.1 Recycling</b>	<i>No specific federal regulatory requirements.</i>									
<b>3.6.2.2 Composting</b>		U	U	U						
<b>3.6.3 Source Reduction</b> Pollution prevention/waste minimization programs										
<b>3.6.4 Disposal</b>	U	U				U				
<b>3.6.4.1 Landfill Operation</b>	U	U				U				
Waste analysis						U				
Leachate collection	U					U				
Methane gas collection						U				
Daily cover						U				
Pesticide application	<i>See Section 3.4—Pesticide/Vector Management.</i>									
Disposal practices						U				
<b>3.6.4.2 Municipal Waste Combustion</b>		U				U				
Monitoring (air quality issues)		U								
Disposal of residual ash						U				
<b>3.6.5 Household Hazardous Waste Collection and Storage</b>										

OPERATION											
	CWA	CAA	CERCLA	EPCRA	FIFRA	RCRA	TSCA	SDWA	NEPA	ESA	
Construction of lines/planning design	<i>See Section 3.3—Construction/Property Management.</i>										
Construction of wastewater treatment plant Upgrades for additional capacity	<i>See Section 3.3—Construction/Property Management.</i>										
<b>3.7.1 Operation and Maintenance of Sewer Systems</b>	U										
<b>3.7.1.1 Sanitary Sewer Systems</b>	U										
<b>3.7.1.2 Combined Sewer Systems</b>	U										
<b>3.7.1.3 Municipal Separate Storm Sewer Systems</b>	U										
<b>3.7.1.4 Water Line Repair/Replacement</b>	U										
<b>3.7.2 Wastewater Treatment</b>	U	U	U	U	U	U	U				
<b>3.7.2.1 Wastewater Treatment Process</b>	U	U	U	U		U	U				
Air emissions (MACT standard)	U										
Nuisance odor control	<i>Generally regulated under local ordinance.</i>										
Pesticide/vector control	<i>See Section 3.4—Pesticide/Vector Management.</i>										
Digester operation and maintenance (methane burners, scrubbers)	U	U									
Painting		U				U					
Debris (e.g., grit) management (if hazardous)						U					
Stand-by generators Diesel spills	<i>See Section 3.10—Vehicle/Equipment Maintenance.</i>										
Transformers-PCBs							U				
Vehicle maintenance	<i>See Section 3.10—Vehicle/Equipment Maintenance.</i>										
<b>3.7.2.2 NPDES Permit Compliance</b>	U										
Beach monitoring (CSOs)	U										
Nontraditional treatment systems	U										



OPERATION											
	CWA	CAA	CERCLA	EPCRA	FIFRA	RCRA	TSCA	SDWA	NEPA	ESA	
Artificial wetlands	U										
Groundwater monitoring in NPDES permit application	U										
Surface applications	U										
Point/nonpoint pollution trading	<i>No specific federal regulatory requirements.</i>										
<b>3.7.2.3 Laboratory Operations</b>	U					U					
Toxicity evaluation reduction	U										
<b>3.7.2.4 Pretreatment Program</b>	U										
Source control to improve compliance, biosolids reuse	U										
Hauled wastes/manifest/waste characterization	U										
<b>3.7.2.5 Biosolids Management and Disposal (land application, surface disposal, incineration, landfilling)</b>	U	U				U					
<b>3.7.2.6 Chemical Storage/Hazardous Materials Management (e.g., solvents for building maintenance, chlorination, chemicals to control erosion)</b>		U	U	U							
<b>3.7.3 Vehicle/Equipment Maintenance</b>											
<b>3.8.1.1 Best Management Practices</b>	<i>No specific federal regulatory requirements, but local governments are encouraged to develop surface water protection programs.</i>										
<b>3.8.1.2 Nonstructural BMPs</b> Street sweeping Vegetative buffer areas Marsh vegetation Watershed monitoring Reservoir management Pollution prevention	<i>No specific federal regulatory requirements, but local governments are encouraged to develop surface water protection programs.</i>										

OPERATION											
	CWA	CAA	CERCLA	EPCRA	FIFRA	RCRA	TSCA	SDWA	NEPA	ESA	
Zoning and subdivision ordinances Site plan reviews Design and operating standards Property or easement purchases Public education Household hazardous waste collection Groundwater monitoring	<i>States must develop their own wellhead protection programs. No specific federal regulatory requirements, but local governments are encouraged to become involved in wellhead protection programs.</i>										
Dams, canals, levees New construction Design issues (NEPA)	<i>See Section 3.3—Construction/Property Management.</i>										
Flood control/management (e.g., flood walls) Storm water channeling Dam decommissioning/demolition Erosion and sediment control	U										
<b>3.9.1 Water Treatment</b>	U	U	U	U		U		U			
Treating water								U			
<b>3.9.1.1 Chemical Storage/Hazardous Materials Management</b>	U	U	U	U							
<b>3.9.1.2 Laboratory Operations</b>	U					U					
<b>3.9.1.3 Residual Management</b>	U					U					
<b>3.9.2 Water Distribution System Operation and Maintenance</b>	U	U		U		U		U			
<b>3.9.2.1 Cross Connection Control and Backflow Prevention</b>	<i>No specific federal regulatory requirements.</i>										
<b>3.9.2.2 Water Pipe Flushing</b>	U										
<b>3.9.2.3 Water Main Repair/Replacement</b> Lead pipes Lost water through old or broken pipes	U	U		U				U			
<b>3.9.2.4 Storage Tank Maintenance (painting)</b>		U				U					
<b>3.9.2.5 Pump Maintenance</b>	<i>See Section 3.10—Vehicle/Equipment Maintenance.</i>										

OPERATION											
	CWA	CAA	CERCLA	EPCRA	FIFRA	RCRA	TSCA	SDWA	NEPA	ESA	
<b>3.9.2.6 SDWA Compliance</b>								U			
Water reuse Water conservation	<i>No specific federal regulatory requirements.</i>										
<b>3.9.3 Vehicle/Equipment Maintenance</b>											
<b>3.10.1 Vehicle Repair Shops</b>	U	U				U	U				
<b>3.10.1.1 Changing Vehicle Fluids</b> (hydraulic fluids, used oil, use coolants, radiator fluid)	U					U					
<b>3.10.1.2 Washing Vehicle Parts</b>	U	U				U					
<b>3.10.1.3 Maintaining Vehicle Batteries</b>	U					U					
<b>3.10.1.4 Repairing Air Conditioners</b>		U									
<b>3.10.1.5 Washing Vehicles and Shop Floors</b>	U										
<b>3.10.1.6 Repairing or Replacing Exhaust Systems</b>		U									
<b>3.10.1.7 Painting Vehicles</b>		U				U					
<b>3.10.1.8 Storing Materials Outside</b> Storm water management	U										
Used asbestos brake pads							U				
Used tires	<i>No specific federal regulatory requirements.</i>										
<b>3.10.2 Fueling Stations</b>	U	U				U					
<b>3.10.2.1 Fuel Storage</b>	U					U					
<b>3.10.2.2 Fuel Dispensing</b>		U									
<b>3.10.2.3 Disposing of Unused Fuel</b>						U					
<b>3.10.2.4 Storm Water Management</b>	U										

