

**STORMWATER MANAGEMENT PLAN**

**FOR**



**ERIE COUNTY SEWER DISTRICT NO. 6**

**IN COMPLIANCE WITH**

**MUNICIPAL SEPARATE STORM SEWER SYSTEM  
[ MS4 ]**

**JANUARY 2009**

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## INTRODUCTION

The Western New York Stormwater Coalition (WNYSC) Stormwater Management Plan has been developed to comply with the New York State Department of Environmental Conservation General Permit for Stormwater Discharges from Municipal Separate Storm Sewer Systems (GP-0-08-002). It is a shared Stormwater Management Plan providing policy and management guidance to the regulated municipalities and agencies that are members of the WNYSC.

The Erie County Sewer District No. 6 (ECSD # 6) is a member of the Western New York Stormwater Coalition and a party to this Stormwater Management Plan.

The Stormwater Management Plan is based on the Federal Stormwater Phase II rule, issued in 1999, which requires municipal separate storm sewer system (MS4) owners and operators, in U.S. Census-defined urbanized areas, to develop a Stormwater Management Program. There are six program elements designed to reduce the discharge of pollutants to the maximum extent practicable. The program elements, titled Minimum Control Measures, include:

1. Public Education and Outreach
2. Public Involvement / Participation
3. Illicit Discharge Detection and Elimination
4. Construction Site Runoff Control
5. Post-Construction Stormwater Management
6. Pollution Prevention / Good Housekeeping for Municipal Operations.

Each Minimum Control Measure and the Best Management Practices that have been implemented to maintain compliance with the NYSDEC GP-0-08-002 General Permit are described in the plan. For each Best Management Practice, responsibilities to achieve and sustain compliance are clearly defined. Portions of the work necessary are provided through the collective efforts of the Western New York Stormwater Coalition members. The remaining work is the responsibility of the individual permit holder.

Certain components of this program have been codified into local law. Refer to the ECSD # 6 Rules and Regulations for MS4.

This Stormwater Management Plan should be updated on an annual basis in order to take into consideration the latest technologies and information to maintain compliance with the NYSDEC GP-0-08-002 General Permit.

## STORMWATER MANAGEMENT PLAN

### GENERAL DEFINITIONS AND REQUIREMENTS

**Best Management Practices (BMPs)** - Activities or structural improvements that help reduce the quantity and improve the quality of stormwater runoff. BMPs include public education and outreach, treatment requirements, operating procedures, and practices to minimize contamination of runoff, spillage or leaks, sludge or waste disposal, or drainage from materials storage areas.

**Clean Water Act** - Amendments incorporated into the Federal Water Pollution Control Act in 1972 to establish water quality standards and to create the National Pollutant Discharge Elimination System to protect the waters of the U. S. by regulating the discharge of pollutants from point source discharges and municipal separate storm sewer systems.

**Combined Sewer System** – A sewer system designed to convey both sanitary wastewater and stormwater.

**Detention Pond** – Pond that stores a volume of water for a given period of time and then discharges to downstream waters.

**Discharge** – An outflow of water from a stream, pipe, ground water system or watershed.

**Ecosystem** – all of the plants and animals in an area that interact to make up the local environment.

**Erosion** – the overall process of the transport of material on the earth's surface including the movement of soil and rock by agents such as water, wind, or gravity.

**Groundwater** – all of the water contained in void space beneath the earth's surface.

**Heavy Metals** - Metals such as zinc, copper, lead, mercury, chromium, cadmium, manganese, nickel, molybdenum and silver that, even in low concentrations can be toxic or lethal to humans, animals and aquatic life.

**Illicit Discharge** - The term refers to any discharge to an MS4 that is not composed entirely of stormwater unless authorized via an NPDES permit or otherwise excluded from regulation. Thus, not all illicit discharges are illegal or prohibited.

**Industrial Waste** - Unwanted materials from an industrial operation. It may be liquid, sludge, solid, or hazardous waste.

**Large Municipal Separate Storm Sewer System (Large MS4)** – all municipal separate storm sewers that are located in an incorporated place with a population of 250,000 or more according to the latest Census.

**Maximum Extent Practicable (MEP)** – a water quality standard that applies to all MS4 operators under NPDES permits. The standard has no exact definition, as it was intended to be flexible to allow operators to tailor their stormwater programs to their particular site.

**Medium Municipal Separate Storm Sewer System (Medium MS4)** – all municipal separate storm sewers that are located in an incorporated place with a population of more than 100,000 but less than 250,000.

**Municipal Separate Storm Sewer Systems (MS4)** - Areas with a conveyance or system of conveyances (including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, man-made channels, and storm drains) that are not a combined sewer or part of a publicly owned treatment

system and are owned or operated and regulated by a municipality or authorized agency. MS4s may be small, medium or large with the medium or large MS4s being principally determined by population size.

**Non-Point Source Pollutants (NPS)** – pollution coming from many diffuse sources whose origin is often difficult to identify. This pollution occurs as rain or snowmelt travels over the land surface and mobilizes pollutants such as fertilizer, pesticides, and chemicals from cars. This pollution is difficult to regulate due to its origin from many different sources. These pollutants enter waterways untreated and are a major threat to aquatic organisms and people who fish or use waterways for recreational purposes.

**National Pollutant Discharge Elimination System (NPDES)** – the EPA's regulatory program to control the discharge of pollutants to waters of the United States.

**Notice of Intent (NOI)** - An application to notify the permitting authority of a facility's intention to be covered by a general permit. This exempts a facility from having to submit an individual or group application.

**Nutrients** - The term typically refers to nitrogen and phosphorus or compounds containing free amounts of the two elements. These elements are essential for the growth of plant life, but can create problems in the form of algal blooms, depletion of dissolved oxygen and pH changes in streams and other water bodies when higher concentrations are allowed to enter drainage systems and lakes.

**Ordinance** - A law based on state statutory authority developed and approved by a governmental agency to allow them to regulate the enforcement of criteria contained within the specific law and to invoke sanctions and other enforcement measures to ensure compliance with the criteria.

**Outfall** – the point where a sewer or drainage discharges into a receiving waterway, or where stormwater flows from one municipal jurisdiction into another.

**Point Source Pollution** – pollution coming from a single, definable source, such as a factory.

**Retention Pond** – Pond that stores a volume of water without allowing it to discharge downstream.

**Runoff** – any drainage that leaves an area as surface flow.

**Sanitary Sewer** – an underground pipe system that carries sanitary waste and other wastewater to a treatment plant.

**Sediment** – material derived from the weathering of rock such as sand and soil. This material can be detrimental to aquatic life and habitats if an excessive amount flows into rivers and ponds.

**Site Plan** – a geographic representation of the layout of buildings and other important features on a tract of land.

**State Pollutant Discharge Elimination System (SPDES)** – New York State's regulatory program to control the discharge of pollutants to waters of the United States.

**Storm Drain** – any drain which discharges directly into the storm sewer system, usually found along roadways or in parking lots.

**Storm Sewer** – an underground pipe system that carries runoff from streets and other surfaces.

**Stormwater** – rain water or snow melt runoff, and surface runoff and drainage.

**Stormwater Management** – any measure associated with the planning, maintenance, and regulation of facilities which collect, store, or convey stormwater.

Comment [MCR1]: Deleted text

**Stormwater Pollution Prevention Plan (SWPPP)** - A plan developed by a facility or entity that thoroughly evaluates potential pollutant sources at a site and selects and implements appropriate best management practices that are designed to prevent or control the discharge of pollutants in stormwater runoff.

**Surface Runoff** – the flow of water across the land surface that occurs when the rainfall rate exceeds the ability of the soil to absorb the water. Also occurs on impervious surfaces, such as parking lots, where water cannot infiltrate at all.

**Surface Water** – any water that remains on the earth's surface, such as ponds, rivers, streams, impoundments, wetlands, oceans, etc.

**Total Maximum Daily Load (TMDL)** – a regulatory limit of the maximum amount of a pollutant type that can be released into a body of water in a twenty-four hour period without adversely affecting water quality.

**Tributary** – a stream which drains into another larger body of water.

**Urbanized Area (UA)** - a land area consisting of one or more central places and the adjacent densely settled surrounding area (urban fringe) that together have a residential population of at least 50,000 and a minimum average population density of at least 1,000 people per square mile.

**Watershed** – a geographic area in which water drains into a certain stream or river and flow out of the area via that stream or river. All of the land that drains to a particular body of water. Also known as a drainage basin.

**Waters of the US** – includes both groundwater and surface waters such as wetlands, lakes (including dry lakes), rivers, streams (including intermittent streams, ephemeral washes and arroyos), mudflats, sandflats, sloughs, wet meadows, playa lakes, natural ponds, and man-made impoundments.

**Wetlands** – an area of land where part of the surface is covered with water or the soil is completely saturated with water for a large majority of the year. Wetlands are also natural stormwater control areas, since they filter out pollutants and are able to retain large amounts of water during storm events.

## LIST OF COMMONLY USED ABBREVIATIONS

- BMP** – Best Management Practice
- CWA** – Clean Water Act
- DSM** – Division of Sewerage Management
- ECDEP** – Erie County Department of Environment and Planning
- ECSD** – Erie County Sewer District
- MCM** – Minimum Control Measure
- MEP** – Maximum Extent Practicable
- MS4** – Municipal Separate Storm Sewer System
- NOI** – Notice of Intent
- NPS** – Non-Point Source Pollutants
- NPDES** – National Pollution Discharge Elimination System
- NYSDEC** – New York State Department of Environmental Conservation
- POC** – Pollutant of Concern
- SPDES** – State Pollution Discharge Elimination System
- SOP** – Standard Operating Procedure
- SWMP** – Stormwater Management Plan
- SWPPP** – Stormwater Pollution Prevention Plan
- TMDL** – Total Maximum Daily Load
- USACOE** – United States Army Corps of Engineers
- USEPA** – United States Environmental Protection Agency
- UST** – Underground Storage Tank
- WNYSC** – Western New York Stormwater Coalition

## SECTION 1 - PUBLIC EDUCATION AND OUTREACH ON STORMWATER IMPACTS

### 1.1 Description of Minimum Control Measure

The Public Education and Outreach minimum control measure consists of Best Management Practices (BMPs) that focus on the development of educational materials designed to inform the public about the impacts that stormwater discharges have on local water bodies. The educational materials contain specific actions as to how the public, as individuals or collectively as a group, can participate in reducing pollutants and their impact on the environment. The Public Education and Outreach program and BMPs, in combination, are expected to reach all of the constituents within the MS4s permitted boundary. The target pollutant sources are construction site runoff, impacts from new and re-development projects, illicit discharges and local/regional Pollutants of Concern (POCs).

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### 1.2 General Permit Requirements

Comment [MCR3]: As per GP-0-08-002

*An MS4 must, at a minimum:*

- a. Identify POCs, waterbodies of concern, geographic areas of concern, target audiences;
- b. Develop and implement an ongoing public education and outreach program designed to describe to the general public and target audiences:
  - i. the impacts of stormwater discharges on waterbodies;
  - ii. POCs and their sources;
  - iii. steps contributors of these pollutants can take to reduce pollutants in stormwater runoff; and
  - iv. steps contributors of non-stormwater discharges can take to reduce pollutants (non-stormwater discharges are listed below);
- c. Develop, record, periodically assess, and modify as needed, measurable goals; and
- d. Select appropriate education and outreach activities and measurable goals to ensure the reduction of all POCs in stormwater discharges to the MEP.

Non-stormwater discharges are defined in the MS4 General Permit (GP-0-08-002) Part I.A.2 and include:

- Waterline flushing
- Landscape irrigation
- Diverted stream flows
- Rising ground waters
- Uncontaminated ground water infiltration
- Uncontaminated ground water
- Discharges from potable water sources
- Foundation drains
- Air conditioning condensate
- Irrigation water
- Springs
- Water from crawl space and basement sump pumps
- Lawn and landscape watering runoff provided that all pesticides and fertilizers have been applied in accordance with the manufacturer's product label

- Water from individual residential car washing
- Flows from riparian habitats and wetlands
- Dechlorinated swimming pool discharges
- Residual street wash water
- Discharges or flows from fire fighting activities
- Dechlorinated water reservoir discharges
- Any SPDES permitted discharge

### 1.3 Methodology for Compliance with Permit Requirements

The WNYSC has developed many of the BMPs necessary for this MCM. These have included brochures, posters, webpage, education packages, and a display for community events. These BMPs will be updated by the WNYSC on an annual basis and made available to each MS4 that is a member of the WNYSC.

### 1.4 Best Management Practices

#### 1.4.1 Stormwater Pollution Prevention Brochures

##### Description / Methodology

Develop public education brochures addressing stormwater pollution prevention for the general public, target businesses/activities and schools. Ten brochures have been developed and are titled as follows:

- Automotive & Related Industries
- Construction Site Stormwater Runoff Control
- Concrete & Mortar Operations
- Roadwork & Paving
- Food & Restaurant Industries
- Pools, Fountains & Spas
- Mobile Cleaners: Carpet, Upholstery Cleaners, Janitorial Service Providers
- Hospitals, Medical Treatment Centers & Healthcare Facilities
- Pesticide Application, Lawn Care and Landscaping
- Household Guide to Preventing Stormwater Pollution

Additional brochures to be developed will address the following topics:

- POCs and their sources
- Illicit discharges
- Post-construction practices
- Erosion and sediment control

Brochures are typically distributed through trade associations, public outreach events, seminars and other educational programming.

The brochures are available on the WNYSC webpage along with information for businesses, municipalities, schools, and the general public to request additional brochures or download the brochures directly.

##### Annual Compliance Requirements

##### **WNYSC**

Distribute relevant brochures to targeted businesses and general public.

Distribute Household Guide to all public libraries

Provide additional brochures to local MS4s upon request.

Provide additional brochures to businesses, schools, and the general public upon request.

Update educational materials and distribute to MS4s

**Stormwater Management Officer**

Display public education materials.

Inventory existing stock of brochures and replenish as needed.

Maintain records of number of educational materials distributed.

1.4.2 *Public Education Posters*

Description / Methodology

Prepare public education posters that can be placed within municipal buildings, libraries, and schools.

Annual Compliance Requirements

**WNYSC**

Update posters as needed and deliver to each MS4 and all public libraries

**Stormwater Management Officer**

Replace outdated posters with new posters as they become available from the WNYSC.

1.4.3 *Webpage*

Description / Methodology

Develop a webpage designed to educate the public on the impacts of stormwater runoff on local waterbodies.

Develop a list of subjects for inclusion and discussion on the webpage based on consideration of the following subjects:

- Citizen reporting under the illicit discharge and construction programs.
- Water quality impacts of stormwater runoff to local water bodies.
- Steps the public can take to reduce stormwater pollution.
- Public involvement programs.
- Update and post new information to the webpage as needed.

Comment [MCR4]: Deleted text

Annual Compliance Requirements

**WNYSC**

Update and maintain the webpage as necessary.

#### 1.4.4 *K-12 Education Packages*

##### Description / Methodology

Develop age appropriate materials for distribution to local educators in order to foster an early age respect for the environment. Distribution will include information describing environmental education services available to local educators regarding stormwater quality issues. Education materials will be updated as necessary to maintain consistency with current standards and to reflect any input received from school administrators and teachers.

##### Annual Compliance Requirements

###### **WNYSC**

Update education materials biennially

Distribute education materials to all schools and maintain records of the distribution.

#### 1.4.5 *Public Education Display for Community Events*

##### Description / Methodology

Public education displays, addressing general stormwater pollution prevention and rain gardens, have been developed for use by MS4s at their community events. The displays are prepared and maintained by the WNYSC. A number of displays addressing the two topics are available. A reservation system mitigates potential conflicts between municipalities requesting the display for the same time period.

The displays consist of a poster board, public education materials, the Enviroscope watershed model, stormwater quiz cards, a prize wheel and promotional items (answering a quiz card successfully allows a spin on the wheel). Use of the items listed will depend on the audience and venue.

It will be each municipality's responsibility to obtain the display from ECDEP and return it promptly.

##### Annual Compliance Requirements

###### **ECDEP**

Maintain displays, prepare for each MS4 and manage the reservation system.

Conduct outreach and education at regional community events on behalf of WNYSC membership

Maintain records pertaining to DEP use of the public education display(s)

###### **Stormwater Management Officer**

Incorporate stormwater public education into community events.

#### 1.4.6 Public Information Press Package

##### Description / Methodology

A public information press package was prepared and distributed to local news agencies. Each MS4 received the package as well. The press package includes the following:

- Information targeting stormwater pollution prevention for households. This includes U.S. EPA's *After the Storm* video.
- Printed public service announcements.
- Invitation for public participation at open WNYSC meetings.
- Invitation for public to review of draft SWMP (sample press release).
- Invitation for public to review draft Annual Report (sample press release).
- Invitation for Community Cleanup Events (sample press release).

Comment [MCR5]: Deleted text

Comment [MCR6]: Deleted text

Information in the press package is generic relative to dates and times. Specific dates and times will be developed by the WNYSC and each municipality. Not all components developed for the press package should be released with each announcement.

##### Annual Compliance Requirements

###### **WNYSC**

Document the distribution and content of press materials utilized. Target at least two press releases per year to account for the open WNYSC meetings and public review of draft Annual Report.

Bi-Ennial: Distribute printed, video or audio public service announcements to local news agencies and the MS4s.

Bi-Ennial: Document distribution and content of each press package.

#### 1.5 Required Reporting

At a minimum, the permittee shall report on the items below:

a. list education / outreach activities performed for the general public and target audiences and provide any results (for example, number of people attended, amount of materials distributed, etc.);

b. permittees performing the education and outreach activities required by other MCMs (listed below), may report on those activities in MCM 1 and provide the following information applicable to their program:

- IDDE education activities planned or completed for public employees, businesses, and the general public, as required by Part VII.A.3 of GP-0-08-002;
- construction site stormwater control training planned or completed, as required by Part VII.A.4 of GP-0-08-002;
- employee pollution prevention / good housekeeping training planned or completed, as required by Part VII.A.6 of GP-0-08-002 ;

c. report on effectiveness of program, BMP and measurable goal assessment.

## 2 PUBLIC PARTICIPATION / INVOLVEMENT

### 2.1 Description of Minimum Control Measure

The Public Involvement/Participation minimum control measure consists of Best Management Practices (BMPs) that focus on involving the local public in development and implementation of the SWMP. Compliance with State and local public notice requirements will facilitate public participation. The BMPs include a number of practices designed to seek public input on the SWMP and Annual Report accomplishments. They also describe specific activities that encourage public participation. The target audiences for the public involvement program are key individuals and groups that may have an interest in the particular BMPs and the general public located within the permitted boundary.

### 2.2 General Permit Requirements

Comment [MCR7]: As per GP-0-08-002

An MS4 must, at a minimum:

a. Comply with the State Open Meetings Law and local public notice requirements, such as Open Meetings Law, when implementing a public involvement / participation program;

b. Develop and implement a public involvement/participation program that:

- identifies key individuals and groups, public and private, who are interested in or affected by the SWMP ;
- identifies types of input the permittee will seek from the key individuals and groups, public and private, to support development and implementation of the SWMP and how the input will be used; and
- describes the public involvement / participation activities the permittee will undertake to provide program access to those who want it and to gather the needed input. The activities included, but are not limited to a water quality hotline (report spills, dumping, construction sites of concern, etc.), stewardship activities like stream cleanups, storm drain marking, and volunteer water quality monitoring;

c. Local stormwater public contact.

Identify a local point of contact for public concerns regarding stormwater management and compliance with this general SPDES permit. The name or title of this contact and the telephone number must be published in public outreach and public participation materials and kept updated with the Department on the MCC form;

d. Annual report presentation.

Below are the requirements for the annual report presentation:

i. prior to submitting the final annual report to the Department, by June 1 of each reporting year (see Part V.C.), present the draft annual report in a format that is open to the public, where the public can ask questions about and make comments on the report. This can be done:

- at a meeting that is open to the public, where the public attendees are able to ask questions about and make comments on the report. This may be a regular meeting of an existing board, such as planning, zoning or the town board. It may also be a separate meeting, specifically for stormwater. If multiple permittees are

working together, they may have a group meeting (refer to Part V.C.2);

- making the annual report available to the public on a webpage;
- providing the public the opportunity to provide comments on the internet or otherwise;
- making available the opportunity for the public to request an open meeting to ask questions about and make comments on the report. If a public meeting is requested by 2 or more persons, the permittee must hold such a meeting. However, the permittee need only hold a public meeting once to satisfy this requirement.

ii. provide public notice about the presentation, making public the following information when noticing the presentation in accordance with the State Open Meetings Law or other local public notice requirements:

- the placement of the annual report on the agenda of this meeting or location on the internet;
- the opportunity for public comment. Comments received after the final annual report is submitted shall be reported with the following year's annual report. Permittees must take into account those comments in the following year;
- the date and time of the meeting or the date the annual report becomes available on the internet; and
- the availability of the draft report for prior review prior to the public meeting or duration of availability of annual report on the internet;

iii. the Department recommends that announcements be sent directly to individuals (public and private) known to have a specific interest in the permittee's SWMP;

iv. include a summary of comments and (intended) responses with the final annual report. Changes made to the SWMP in response to comments should be described in the annual report; and

v. ensure that a copy of the final report and, beginning in 2009, the SWMP plan are available for public inspection;

e. Develop, record, periodically assess and modify as needed measurable goals; and

f. Select appropriate public involvement / participation activities and measurable goals to ensure the reduction of POCs in stormwater discharges to the MEP.

### **2.3 Methodology for Compliance with Permit Requirements**

In order to comply with this MCM, each municipality must involve the local public in their SWMP. By participating in the WNYSC, each municipality can comply with certain aspects of the SWMP such as public participation at the WNYSC meetings, incorporating a feedback mechanism into the webpage, community cleanup events, and public meetings in targeted Erie and Niagara County Watersheds. MS4s will be responsible for allowing public review of their individual SWMPs and Annual Reports. MS4s can also develop programs such as volunteer monitoring of outfalls, adopt-a-stream program, and storm sewer stenciling. These BMPs are not General Permit requirements but do foster public involvement and may be of interest to the local MS4 for incorporating into their SWMP.

## 2.4 Best Management Practices

### 2.4.1 Identify Contact Person for Stormwater Program

#### Description / Methodology

Establish a "Stormwater Management Officer" that is responsible for the management of the MS4s stormwater management program. The Stormwater Management Officer would likely be the Code Enforcement Officer, Engineer, or his/her staff.

#### Annual Compliance Requirements

##### **Stormwater Management Officer**

Update the designated Stormwater Management Officer.

### 2.4.2 Public Meetings to Reach Key Groups and Individuals and Promote Public Involvement Opportunities

#### Description / Methodology

Twice per year, the WNYSC will schedule a public meeting to educate key individuals and groups who are interested in or affected by the SWMP on the status of implementation in the MS4s of Erie and Niagara County. Public employees, businesses and the general public will also be targeted for attendance. In addition, the meetings will be used to solicit input from those key individuals and groups on the SWMP and to publicize opportunities for public participation and involvement. The meetings will be hosted by one or more MS4s and will take place in locations that will draw individuals and groups that are based in the northern and southern portions of the Urbanized Area.

#### Annual Compliance Requirements

##### **WNYSC**

Bi-Annual: Publish a notice in the local paper for each public meeting held by the WNYSC, notifying the public of their invitation to participate.

##### **Stormwater Management Officer**

Bi-Annual: Assist the WNYSC with planning the public meeting, promote the meeting to key individuals and groups within the MS4 and participate in the meeting.

### 2.4.3 Incorporate Feedback Mechanism into Webpage

#### Description / Methodology

Through either the WNYSC, and/or the municipality's webpage, provide a means for public input/comment regarding the stormwater management program.

#### Annual Compliance Requirements

##### **WNYSC**

Maintain WNYSC stormwater webpage feedback mechanism for residents. Document input/comments received, and actions taken.

Comment [MCR8]: Revised Sections 2.42 & 2.4.3 in original SWMP into one section

#### 2.4.4 *Public Review of Stormwater Management Plan*

##### Description / Methodology

Provide the public with an ongoing opportunity to inspect the Stormwater Management Plan.

##### Annual Compliance Requirements

##### **Stormwater Management Officer**

Provide an opportunity for public inspection of the Stormwater Management Plan.

#### 2.4.5 *Public Review of Annual Report*

##### Description / Methodology

All regulated MS4s must submit an annual report by June 1 of each year that updates the NYSDEC on the status of their stormwater management program. Before submittal of the annual report to NYSDEC, a draft report must be prepared and presented to the public for their review and comment.

##### Annual Compliance Requirements

##### **WNYSC**

Present the WNYSC's shared draft Annual Report at a WNYSC meeting that is open to the public. Post the draft Annual Report on the WNYSC webpage for public review and comment.

##### **Stormwater Management Officer**

Present the draft Annual Report at a meeting that is open to the public and/or on the internet to solicit public review and comment.

Provide public notice about the presentation in accordance with State Open Meetings Law or other local public notice requirements. See Section 2.2 for specific Permit requirements.

#### 2.4.6 *Community Cleanup Event*

##### Description / Methodology

Inform and encourage residents about the many opportunities that exist to participate in area community cleanup events: Household Hazardous Waste Collections held several times per year by Erie and Niagara Counties; nationally sponsored "Great American Cleanup" events that can be organized locally; and locally sponsored, volunteer cleanup activities such as Buffalo Niagara Riverkeepers spring shoreline cleanup and Fall Beach Sweep; and State sponsored Adopt A Highway Programs.

##### Annual Compliance Requirements

##### **EC DEP**

Publish a notice in the local paper and on the Erie County Household Hazardous Waste webpage that notifies residents of their opportunity to participate in the Erie County Household Hazardous Waste Collections events.

**WNYSC and/or Stormwater Management Officer**

Schedule at least one stream or roadway cleanup per year.

Have information on local cleanup opportunities available at the office of the ECDEP or local Stormwater Management Officer, along with an application for volunteer group sign-up. Also, advertise these events on the town and/or county webpage.

- 2.4.7 *Identify key individuals and groups who are interested in/or affected by the permitting program*

Description / Methodology

Environmental groups identified as having an interest in the WNYSC's Stormwater Management Program include: Erie County Environmental Management Council (EMC), Niagara County EMC, municipal Conservation Advisory Committees (CAC's), the Buffalo Niagara Riverkeepers, Citizens Coalition for the Environment (CCE), and the Erie County Water Quality Committee (ECWQC).

Annual Compliance Requirements

**WNYSC**

Outreach to EMCs, Buffalo Niagara Riverkeepers, CCE, and ECWQC regarding the activities of the WNYSC and how the groups may assist with the Stormwater Management Program.

**Stormwater Management Officer**

Outreach to CAC, regarding the activities of the WNYSC and how the group may assist with their local MS4 Stormwater Management Program.

- 2.4.8 *Identify types of input the MS4 would seek from the individuals or groups to support development and implementation of the program*

Description / Methodology

Environmental groups identified as having an interest in the WNYSC's Stormwater Management Program will be enlisted to assist with its implementation through participation in the WNYSC's public education and public involvement workgroup. These groups will be encouraged to:

Attend monthly WNYSC meetings.

Assist with the developing public education materials and public involvement activities.

Publicize and staff community cleanup events.

Assist with public education activities.

Review the Draft Annual Report of the WNYSC and MS4s.

Annual Compliance Requirements

**WNYSC**

Enlist support/participation of representatives from the EMCs, Buffalo Niagara Riverkeepers, CCE, and ECWQC in WNYSC workgroup activities and implementation of the Stormwater Management Program.

**Stormwater Management Officer**

Enlist support/participation of the municipal CAC in efforts related to implementation of their local Stormwater Management Program.

2.5 *Required Reporting*

At a minimum, the permittee shall report on the items below:

- a. annual report presentation information (date, time, attendees) or information about how the annual report was made available for comment;
- b. comments received and intended responses (as an attachment);
- c. public involvement / participation activities (for example stream cleanups including the number of people participating, the number of calls to a water quality hotline, the number and extent of storm drain stenciling); and
- d. report on effectiveness of program, BMP and measurable goal assessment.

### 3 ILLICIT DISCHARGE DETECTION & ELIMINATION

#### 3.1 Description of Minimum Control Measure

The Illicit Discharge Detection and Elimination minimum control measure consists of Best Management Practices (BMPs) that focus on the detection and elimination of illicit discharges into the ECSD # 6 stormsewer system. The BMPs describe outfall mapping and update procedures; the legal authority mechanism that will be used to effectively prohibit illicit discharges; enforcement procedures and actions to ensure that the regulatory mechanism is implemented; the dry weather screening program, procedures for tracking down and locating the source of an illicit discharge; procedures for locating priority areas; and procedures for removing the source of the illicit discharge.

#### 3.2 General Permit Requirements

Comment [MCR9]: As per GP-0-08-002

*ECSD # 6 willt, at a minimum:*

- a. Develop, implement and enforce a program to detect and eliminate illicit discharges (as defined at Section 122.26(b)(2) of GP-0-08-002) into the ECSD # 6 stormsewer system;
- b. Develop and maintain a map, at a minimum within the permittee's jurisdiction in the urbanized area and additionally designated area, showing:
  - the location of all outfalls and the names and location of all surface waters of the State that receive discharges from those outfalls;
  - by March 9, 2010, the preliminary boundaries of the permittee's storm sewersheds determined using GIS or other tools, even if they extend outside of the urbanized area (to facilitate trackdown), and additionally designated area within the permittee's jurisdiction; and
  - when grant funds are made available or for sewer lines surveyed during an illicit discharge trackdown, the permittee's storm sewer system in accordance with available State and EPA guidance;
- c. Field verify outfall locations;
- d. Conduct an outfall reconnaissance inventory, as described in the EPA publication entitled Illicit Discharge Detection and Elimination: A Guidance Manual for Program Development and Technical Assessment, addressing every outfall within the urbanized area and additionally designated area within the permittee's jurisdiction at least once every five years, with reasonable progress each year;
- e. Map new outfalls as they are constructed or newly discovered within the urbanized area and additionally designated area;
- f. Prohibit, through a law, ordinance, or other regulatory mechanism, illicit discharges into the ECSD # 6 stormsewer system and implement appropriate enforcement procedures and actions.

This mechanism must be equivalent to the State's model IDDE local law "NYSDEC Model Local Law to Prohibit Illicit Discharges, Activities and Connections to Separate Storm Sewer Systems".

- g. Develop and implement a program to detect and address non-stormwater discharges, including illegal dumping, to the ECSD # 6 stormsewer system. The

program must include: procedures for identifying priority areas of concern (geographic, audiences, or otherwise) for IDDE program; description of priority areas of concern, available equipment, staff, funding, etc.; procedures for identifying and locating illicit discharges (trackdown); procedures for eliminating illicit discharges; and procedures for documenting actions;

h. Inform public employees, businesses, and the general public of the hazards associated with illegal discharges and improper disposal of waste;

i. Address the categories of non-stormwater discharges or flows (listed in Section 1.2 of this document) as necessary;

j. Develop, record, periodically assess, and modify as needed, measurable goals; and

k. Select appropriate IDDE BMPs and measurable goals to ensure the reduction of all POCs in stormwater discharges to the MEP.

### 3.3 Methodology for Compliance with the Permit Requirements

ECSD # 6 mapped its own outfalls and incorporated them into the Erie County GIS website.

In partnership with Buffalo State College, an Illicit Discharge Track Down Protocol and Sampling Procedure was developed to assist Ms4s with identification of illicit discharges to their systems and the process to use to track down the source and eliminate it if it is impacting water quality.

Prohibited illicit discharges and enforcement procedures are included in the adopted ECSD # 6 rules and Regulations for MS4.

### 3.4 Best Management Practices

#### 3.4.1 Outfall Mapping

##### Description / Methodology

Develop and maintain a map, at a minimum within the permittee's jurisdiction in the urbanized area and additionally designated area, showing:

- the location of all outfalls and the names and location of all surface Waters of the State that receive discharges from those outfalls;
- by the end of the term of this SPDES permit, the preliminary boundaries of the permittee's storm sewer facilities are determined using GIS or other tools, even if they extend outside of the urbanized area (to facilitate track-down), and additionally designated area within the permittee's jurisdiction.

The map should identify each outfall with a unique identifier, and link the outfall to a table of outfall properties that records pertinent properties of each outfall.

##### Completion of Outfall Mapping

##### **WNYSC**

Through the services of a consultant, a draft base map of all of the outfalls for all of the participating WNYSC MS4s was completed in the fall of 2006. All of the

Review of draft outfall data for the ECSD # 6 was completed by the Division of sewerage Management in the summer of 2006. This data was merged into the WNYSC database and is available through the Erie County GIS website.

#### Preliminary Sewershed Boundaries

The Stormwater Outfall mapping data has been compiled within the Erie County GIS system. Included in the layers of GIS data within this system is the layer of designated watersheds, basins and sub-basins. This layer, when displayed along with the outfall data, provides a preliminary map of the sewershed boundaries and the potential area that would drain through a given outfall. The outfall data, as well as the watershed/basin/sub-basin layer of data, have also been incorporated into the Stormwater Management software.

Once an illicit discharge is detected at a specific outfall, the existing basin information and boundaries should be used to define the potential area where the source is located. The MS4 at this point will review storm sewer system drawings and plans to better define the sewershed associated with the outfall of concern.

#### Storm Sewer System Mapping

The storm sewer lines in ECSD #6 have been mapped by ECSD # 6.

### *3.4.2 Updating Outfall Mapping/Outfall Information Management*

#### Description / Methodology

Update information to base outfall map during routine maintenance visits, scheduled outfall inspections, and in response to complaints. Outfall mapping is managed regionally by ECDEP's GIS Department. Therefore, information collected on outfalls will be transmitted to ECDEP's Regional Mapping Manager in accordance with the following WNYSC Outfall Map Updating Policy.

#### Outfall Map Updating Policy

All updates to the WNYSC's Outfall Map, which is located on the Erie County Geographic Information System Internet Server, will be made by the ECDEP GIS staff upon completion and submission of a Stormwater Outfall Map Update Request form by the MS4.

#### Data Collection

The municipality is welcome to conduct their own field visit to collect the necessary information to accurately update the mapping system or arrangements can be made to have a representative from the Department of Environment and Planning (DEP) assist in the field gathering of this information.

#### Request Form for Updating Stormwater Outfall Maps

Regardless of who collects the information, the MS4 requesting a modification of their outfall must complete a Stormwater Outfall Map Update Request form and submit it to the DEP. The MS4 should attach a copy of the outfall data to document any of the outfall information already available or needing revision. DEP will review the request form and all attached information before forwarding

the request to the GIS staff to either follow up for data collection or to make the appropriate revisions to the WNYSC mapping database. Depending on the amount of field work and data collection involved, requests to update mapping information should be completed within one month from when the request form is submitted to DEP.

#### Annual Compliance Requirements

##### **WNYSC**

Update the outfall map as necessary with additional outfalls that have been added to the system.

##### **Stormwater Management Officer**

Submit outfall mapping update forms to ECDEP.

### 3.4.3 *Outfall Surveillance*

#### Description / Methodology

Develop and implement a plan which will detect illicit discharges by conducting routine visual inspections of every mapped outfall. Also, the plan will set criteria for the inspection process. The following plan describes procedures to meet the two minimum requirements associated with outfall surveillance: Prioritizing outfalls for inspections and visual inspection procedures.

#### Dry Weather Outfall Inspections

The consultant hired to map the storm sewer outfalls for WNYSC members conducted an initial visual inspection of the outfalls mapped. The visual inspection report is part of the database of information compiled by the consultant. The initial inspection data should be used to prioritize outfalls for both track down and corrective measures as well as for the next round of required inspections. ECSD # 6 has set an annual goal to visually inspect 20% of their outfalls per year.

#### Prioritizing Outfalls

At a minimum, each municipality is required to review the outfall mapping data and initial inspection information to rank their outfalls on a three to five tier priority basis using the following guidance information developed by the WNYSC workgroup.

#### Guidance for Prioritizing Stormwater Outfalls

The following criteria should be considered in prioritizing storm sewer outfalls for visual inspections:

- The initial inspection information indicates evidence of an illicit discharge. Since ECSD #6 is required to track down and eliminate any identified illicit discharges from their system, any outfalls where an illicit discharge was identified during the initial inspection needs to be the first priority for follow-up.  
*To search for outfalls where the initial inspection information identified a potential problem you can query the database for outfalls that have identified odors, structural damage, odd colors, floatables, or turbidity. The comment section for the outfalls where any of these*

*problems were identified should provide a more detailed description of the problem.*

- Identify the existing land use in the area or sewershed that the outfall drains. Types of land use that should receive priority:
  - Industrial - potential for illicit connections as well as possible contamination from materials stored outside and any industrial processes or practices exposed to the weather.
  - Areas where there are businesses which have industrial stormwater permits, or any type of permitted wastewater discharge as well as any areas where there may be known business sectors with a record of enforcement actions.
  - Heavy commercial use with large impervious parking lots, limited green space.
  - Areas which are under development and have a significant amount of construction activity.
- Identify any environmentally sensitive areas downstream of the outfall.
- Is the outfall located in an area associated with public use, access or recreational facilities? Is the outfall in an area where there has been ambient water quality sampling done that identifies high levels of particular contaminants (e.g., bacteria, metals, etc.) can help to target priority outfalls.
- Outfalls located in areas where there have been repeated complaints of illegal dumping, illicit discharges from pipes and/or apparent contamination in receiving waters should receive priority.
- Outfalls that are structurally damaged. Especially where the damage or structural deficiencies maybe contributing to the pollutant loading to the receiving waters during significant rain events.
- Outfalls located in older areas of the municipality  
Older development may predate more stringent construction codes regarding illegal connections Older areas may have deteriorating sewer and/or storm sewer infrastructure.

#### 3.4.4 Pollutant Source Tracking Procedures

##### Description / Methodology

Develop a plan to investigate and confirm the source of pollutants when water quality issues arise due to public complaints or by scheduled inspection of outfalls. The plan should include:

- A sampling procedure to confirm presence of illicit discharges.
- A protocol to track down the sources of pollution and provide sufficient evidence to pursue elimination and remediation of the illicit discharge.
- A generic spill response plan and coordinate emergency response with other agencies.

Annual Compliance Requirements

**Stormwater Management Officer**

Implement and enforce an Illicit Discharge Track Down and Elimination program utilizing the recommended protocol and in accordance with the ECSD # 6 Rules and Regulations for MS4 to Prohibit Illicit Discharges, Activities and Connections to Separate Storm Sewer System.

Customize the spill response plan to meet municipality's needs

3.4.5 *Adopt Stormwater Management Ordinance*

Description / Methodology

The ECSD # 6 revised and re-adopted the Local Law to include Prohibit Illicit Discharges, Activities and Connections to Separate Storm Sewer System in 2007

Annual Compliance Requirements

**Stormwater Management Officer**

Amend stormwater ordinance as necessary to maintain compliance with NYS standards and requirements.

Revise enforcement action procedures as needed.

3.4.6 *Addressing Categories of Non-Stormwater Discharges*

Description / Methodology

The following discharges are exempt from discharge prohibitions established by local law unless the NYSDEC or the municipality has determined them to be substantial contributors of pollutants: water line flushing or other potable water sources, landscape irrigation or lawn watering, existing diverted stream flows, rising ground water, uncontaminated ground water infiltration to storm drains, uncontaminated pumped ground water, foundation or footing drains, crawl space or basement sump pumps, air conditioning condensate, irrigating water, springs, water from individual residential car washing, natural riparian habitat or wetland flows, dechlorinated swimming pool discharges, residential street wash water, water from fire fighting activities, and any other water source not containing pollutants. |

Comment [MCR10]: Deleted text

Annual Compliance Requirements

**Stormwater Management Officer**

Update non-stormwater discharge list as necessary such that no exempt stormwater discharge is a substantial contribution of pollutants.

3.5 *Required Reporting*

At a minimum, ECSD # 6 will report on the items below:

- a. number and percent of outfalls mapped;

- b. number of illicit discharges detected and eliminated;
- c. percent of outfalls for which an outfall reconnaissance inventory has been performed. ;
- d. status of system mapping;
- e. activities in and results from informing public employees, businesses, and the general public of hazards associated with illegal discharges and improper disposal of waste;
- f. report on effectiveness of program, BMP and measurable goal assessment.

***THE FOLLOWING SECTIONS 4 and 5 ARE THE RESPONSIBILITY OF THE CITY OF LACKAWANNA. THESE TWO SECTIONS ARE INCLUDED FOR COMPLETENESS OF THE PLAN AND TO MAINTAIN CONSISTENCY WITH THE SPDES PERMIT MINIMUM CONTROL MEASURES.***

## Section 4 CONSTRUCTION SITE RUNOFF CONTROL

### 4.1 Description of Minimum Control Measure

The Construction Site Runoff minimum control measure consists of Best Management Practices (BMPs) that focus on the reduction of pollutants to the MS4 from construction activities that result in a land disturbance of greater than or equal to one acre. Reduction of stormwater discharges from construction activity disturbing less than one acre will be considered if it is part of a larger common plan of development or sale that would disturb one acre or more. The BMPs describe the legal authority mechanism that will be used to require erosion and sediment controls; enforcement procedures and actions to ensure compliance; requirements for construction site operators to implement appropriate erosion and sediment control BMPs; requirements for construction site operators to control waste such as discarded building materials, concrete truck washout, chemicals, litter and sanitary waste at the construction site; procedures for site plan review which incorporate the consideration of potential water quality impacts; procedures for receipt and consideration of information submitted by the public; and procedures for site inspection and enforcement of control measures.

The stormwater regulations for Construction Site Runoff Control apply to both privately-owned and managed projects, and MS4-owned and managed projects. Therefore, the BMPs described in this section have application to both types of projects.

### 4.2 General Permit Requirements

*An MS4 must, at a minimum:*

- a. Develop, implement, and enforce a program that:
  - i. provides equivalent protection to the NYS SPDES General Permit for Stormwater Discharges from Construction Activities (either GP-02-01 or GP-0-08-001), unless more stringent requirements are contained within this general SPDES permit (GP- 0-08-002);
  - ii. addresses stormwater runoff to the small MS4 from construction activities that result in a land disturbance of greater than or equal to one acre. Control of stormwater discharges from construction activity disturbing less than one acre must be included in the program if:
    - that construction activity is part of a larger common plan of development or sale that would disturb one acre or more; or
    - if controlling such activities in a particular watershed is required by the Department;
  - iii. includes a law, ordinance or other regulatory mechanism to require a SWPPP for each applicable land disturbing activity that includes erosion and sediment controls that meet the State's most up-to-date technical standards:
    - this mechanism must be equivalent to one of the versions of the "NYSDEC Sample Local Laws for Stormwater Management and Erosion and Sediment Control".
  - iv. contains requirements for construction site operators to implement erosion and sediment control management practices;
  - v. allows for sanctions to ensure compliance to the extent allowable by State or local law;

Comment [MCR11]: As per GP-0-08-002

vi. contains requirements for construction site operators to control waste such as discarded building materials, concrete truck washout, chemicals, litter, and sanitary waste at the construction site that may cause adverse impacts to water quality;

vii. describes procedures for SWPPP review that incorporate consideration of potential water quality impacts and review of individual pre-construction SWPPPs to ensure consistency with State and local sediment and erosion control requirements;

- ensure that the individuals performing the reviews are adequately trained and understand the State and local sediment and erosion control requirements;
- all SWPPPs must be reviewed for sites where the disturbance is one acre or greater; and
- after review of SWPPPs, the permittee must utilize the "SWPPP Acceptance Form" created by the Department and required by the SPDES General Permit for Stormwater Discharges from Construction Activity (GP-0-08-001) when notifying construction site owner / operators that their plans have been accepted and approved by the permittee;

viii. describes procedures for receipt and follow up on complaints or other information submitted by the public regarding construction site storm water runoff;

ix. describes procedures for site inspections and enforcement of erosion and sediment control measures including steps to identify priority sites for inspection and enforcement based on the nature of the construction activity, topography, and the characteristics of soils and receiving water;

- the permittee must ensure that the individual(s) performing the inspections are adequately trained and understand the State and local sediment and erosion control requirements. Adequately trained means receiving inspector training by a Department sponsored or approved training;
- all sites must be inspected where the disturbance is one acre or greater;

x. educates construction site owner / operators, design engineers, municipal staff and other individuals to whom these regulations apply about the municipality's construction stormwater requirements, when construction stormwater requirements apply, to whom they apply, the procedures for submission of SWPPPs, construction site inspections, and other procedures associated with control of construction stormwater;

xi. by two years from the date this permit is issued, ensures that construction site operators have received erosion and sediment control training before they do work within the permittee's jurisdiction. Small home site construction (construction where the Erosion and Sediment Control Plan is developed in accordance with Appendix E of the "New York Standards and Specifications for Erosion and Sediment Control") is exempt from the requirements below:

- training may be provided by the Department or other qualified entities (such as Soil and Water Conservation Districts);

- the permittee is not expected to perform such training, but they may cosponsor training for construction site operators in their area;
- the permittee may ask for a certificate of completion or other such proof of training; and
- the permittee may provide notice of upcoming sediment and erosion control training by posting in the building department or distribute with building permit application;

xii. establishes and maintains an inventory of active construction sites, including the location of the site, owner / operator contact information;

xiii. develop, record, periodically assess and modify as needed measurable goals; and xiv. select appropriate construction stormwater BMPs and measurable goals to ensure the reduction of all POCs in stormwater discharges to the MEP

### 4.3 Methodology for Compliance with Permit Requirements

Each participating MS4 of the WNYSC has adopted NYS's Sample Local Law for Stormwater Management and Erosion & Sediment Control. This ordinance authorizes the MS4 to enforce a program that reduces pollutant runoff from construction sites. Each MS4 will be responsible for reviewing SWPPPs inspecting construction sites, and enforcing the permit requirement on developer's that do not comply with the regulations. The WNYSC will provide training to developers, contractors, and design engineers in order to inform them of the regulations. Training will also be provided by the WNYSC to each participating MS4 personnel that will be responsible for inspecting the construction sites and enforcing the permit requirements.

Comment [MCR12]: Deleted text

### 4.4 Best Management Practices

#### 4.4.1 Stormwater Ordinance

##### Description / Methodology

The stormwater management ordinance establishes minimum stormwater management requirements and controls to protect the general health, safety, and welfare of the public. The ordinance addresses issues relating to:

- Erosion and Sediment Control
- Stormwater Design Requirements
- Construction Requirements
- Fees for municipal services relating to SWPPP reviews, inspections, and maintenance.

##### Annual Compliance Requirements

##### **Municipal Managers**

Customize the ordinance to incorporate municipality's requirements.

Amend stormwater ordinance as necessary to maintain compliance with NYS Standards and Requirements.

#### 4.4.2 *Design Requirements*

##### Description / Methodology

Evaluate existing in-house practices related to review of project planning and design criteria for required changes based on compliance with local, state and/or federal construction stormwater regulations. Develop project planning and design requirements, and communicate requirements to the design and construction communities.

Many MS4-owned and managed projects, and some privately-owned and managed projects, have special conditions which make implementation of standard pollution prevention practices, as defined in the NYS Stormwater Management Design Manual, impractical to implement. Such projects include highway reconstruction, demolition/redevelopment, waterline construction, and other linear-type construction. Acceptable design criteria for these special condition projects must be approved by the MS4 on a project-by-project basis, and the owner's preparation of the GP-0-08-002 Stormwater Pollution Prevention Plan (SWPPP) is the mechanism by which accepted practices are evaluated by MS4.

##### Annual Compliance Requirements

###### **WNYSC**

Review construction project, planning, and design criteria to determine changes needed to comply with local, state and/or federal construction stormwater regulations.

Prepare construction design and permitting guidelines for the local design and construction communities, and involved MS4 personnel.

Distribute construction design and permitting guidelines to the local design and construction communities, and involved MS4 personnel.

###### **Municipal Board**

Revise design and permitting guidelines as necessary

#### 4.4.3 *Construction Plan Review*

##### Description / Methodology

Develop a set of criteria to be utilized by the municipality to verify construction plan compliance with local, state, and/or federal construction stormwater regulations.

Prepare a list of approved structural and non-structural BMPs that meet the requirements of the stormwater regulations. This list will identify if the BMP needs to be used in combination with other BMPs in order to completely satisfy the regulations requirements.

Develop internal tracking and plan review procedures to cover the following issues:

- Conformance to local stormwater regulations
- Appropriate use of temporary erosion controls
- Inclusion of any required local, state, and/or federal stormwater permit documents

Prepare a checklist of items that must be verified by the reviewer for each construction plan review. This checklist will be available to developers, contractors, engineers, and architects to assist them in preparing satisfactory plans.

Provide training for municipal engineers, building department staff, and other municipal representatives that will be completing the construction plan reviews within each municipality.

Educate the local construction community (contractors, developers, engineers, architects) on the construction plans review process.

Implement the construction plans review procedures for local construction sites.

Notify the owners of construction plans when deficiencies are found in the plans during the review process.

Maintain records of plans reviewed and approved for construction under this program.

Conduct SWPPP review for all sites within the MS4 Urbanized Area where the disturbance is one acre or greater to ensure consistency with State and local sediment and erosion control requirements:

- SWPPP Acceptance Form issued by NYSDEC, and required by the General Permit for Stormwater Discharges from Construction Activity (GP-0-08-001), must be signed prior to obtaining permit coverage to indicate plans have been accepted and approved by the MS4. The construction site owner / operators should include the signed SWPPP Acceptance Form with the NOI submitted to NYSDEC for Permit coverage.

#### Annual Compliance Requirements

##### **WNYSC**

Develop criteria to verify construction plan compliance

Prepare list of approved structural and non-structural BMPs.

Prepare a checklist of items for reviewers to verify compliance with regulations.

Customize checklist to incorporate any local requirements.

Continue to train municipal staff that will be completing construction plan reviews.

Educate the local construction community on the construction plans review process.

##### **Stormwater Management Officer**

Implement the construction plans review procedures for local construction sites.

Train additional municipal staff as necessary and update per customized local code. Any changes to construction plan review procedures must be communicated to municipal staff.

Revise checklist as necessary.

Ensure SWPPP reviews are conducted by qualified professionals or supervised by qualified professionals

#### 4.4.4 *Construction Inspection Procedures and Certification Program*

##### Description / Methodology

Develop inspection procedures and educate the local construction community on local stormwater regulations related to construction activities.

Conduct inspections of local construction sites that discharge stormwater to the MS4 to determine compliance with local construction stormwater regulations.

Develop a list of items to incorporate in the inspection of local construction sites based on the final local construction stormwater regulations and including the following categories:

- Use of temporary erosion controls
- Control of other construction related wastes
- Operational and general prohibitions
- Site closure and stabilization requirements
- On-site documentation and records
- Enforcement actions and on-site communication issues

Require all construction site operators to verify at least one employee on site has received required 4 hour erosion and sediment control training within the last 3 years before they do work within the MS4's jurisdiction.

Develop draft inspection forms and procedures necessary to inspect local construction sites in order to ensure compliance with local construction stormwater regulations.

Notify the local construction community (contractors, developers, engineers, architects) for them to review the draft inspection documents and procedures.

Provide notification to the local construction community of the final inspection procedures.

Develop internal procedures for tracking new and on-going construction activities.

Train MS4 inspection personnel on local construction stormwater regulations and inspection procedures.

Inspect qualifying construction sites using appropriate inspection procedures and forms to ensure compliance with local stormwater regulations.

Issue enforcement actions to owners and operators of local construction sites that are not in compliance with local construction stormwater regulations.

Maintain records of construction site inspections, enforcement actions, and corrective actions performed by local construction site owners and operators.

Maintain inventory of active construction sites within the MS4 Urbanized Area.

#### Annual Compliance Requirements

##### **WNYSC**

Develop a list of items to incorporate in the inspection of local construction sites based on the final local construction stormwater regulations.

Develop inspection forms and procedures necessary to inspect local construction sites in order to ensure compliance with local construction stormwater regulations.

Notify the local construction community for them to review the draft inspection documents and procedures.

Develop the final version of the local construction inspection forms and procedures based on the forms prepared by the WNYSC.

Provide notification to the local construction community of the final inspection procedures.

Complete training for MS4 inspection personnel on local construction stormwater regulations and inspection procedures. The training program has commenced and will be conducted for all members of the WNYSC over the next three years.

##### **Stormwater Management Officer**

Inspect qualifying construction sites using appropriate inspection procedures and forms to ensure compliance with local stormwater regulations.

Issue enforcement actions to owners and operators of local construction sites that are not in compliance with local construction stormwater regulations.

By the end of this SPDES term, ensure that all construction site operators have at least one employee on site who has received required 4 hour erosion and sediment control training within the last 3 years before they do work within the MS4's jurisdiction.

The Stormwater Management Officer should obtain proof in the form of an attendance record or other documentation provided to attendees for the purpose of documentation (GP-0-08-002 Part VII.A.4.a.xi).

Maintain an Inventory of active construction sites within the MS4 Urbanized Area in accordance with GP-0-08-002 Part VII.A.4.a.vii.

#### *4.4.5 Project Status Monitoring and Reporting*

##### Description / Methodology

As part of the enforcement code in the stormwater ordinance, records must be maintained to determine construction sites that are either in compliance or not in compliance with state and/or federal construction stormwater permits.

Municipalities are also required to report the number of construction projects that are permitted under state and/or federal construction stormwater regulations.

Annual Compliance Requirements

**Stormwater Management Officer**

Maintain compliance records for all construction sites requiring state and/or federal construction stormwater permits.

4.4.6 *Public Review of Design Plans and Construction Projects*

Description / Methodology

Provide the public with an opportunity to review and comment on proposed design plans and construction sites.

Develop procedures for the public to request information and relay concerns to the representative of the municipality.

Annual Compliance Requirements

**Stormwater Management Officer**

The Public may comment on proposed design plans during the Planning Board or Town Board meetings for proposed projects.

Provide a form on the municipal webpage and at the municipal administration building to allow residents to comment on design plans.

Provide a form on the municipal webpage and at the municipal administration building that allows residents to relay concerns regarding a construction project.

Document the comments received from the public and any actions taken.

4.4.7 *Education and Training Measures for Construction Site Operators*

Description / Methodology

Provide educational material and training opportunities to developers, contractors, engineers, and architects to inform them of the local, state, and/or federal regulations that will impact their developments.

Annual Compliance Requirements

**WNYSC**

Provide additional training sessions as necessary.

4.5 *Required Reporting*

At a minimum, the permittee shall report on the items below:

- a. number of SWPPPs reviewed;
- b. number and type of enforcement actions;
- c. percent of active construction sites inspected once;
- d. percent of active construction sites inspected more than once;

Comment [MCR13]: Deleted text

Comment [MCR14]: Deleted text

e. number of construction sites authorized for disturbances of one acre or more; and

f. report on effectiveness of program, BMP and measurable goal assessment.

## SECTION 5 POST-CONSTRUCTION STORMWATER MANAGEMENT

### 5.1 Description of Minimum Control Measure

The Post-Construction Stormwater Management minimum control measure consists of Best Management Practices (BMPs) that focus on the prevention or minimization of water quality impacts from new development and redevelopment projects that disturb greater than or equal to one acre, including projects less than one acre that are part of a larger common plan of development or sale that discharge into the MS4. The BMPs describe structural and/or non-structural practices; the legal authority mechanism that will be used to address post-construction runoff from new development and redevelopment projects; and procedures to ensure long term operation and maintenance of BMPs.

### 5.2 General Permit Requirements

Comment [MCR15]: As per GP-0-08-002

*An MS4 must, at a minimum:*

- a. Develop, implement, and enforce a program that:
  - i. provides equivalent protection to the NYS SPDES General Permit for Stormwater Discharges from Construction Activities (either GP-02-01 or GP-0-08-001), unless more stringent requirements are contained within this general SPDES permit (GP-0-08-002);
  - ii. addresses stormwater runoff from new development and redevelopment projects to the small MS4 from projects that result in a land disturbance of greater than or equal to one acre. Control of stormwater discharges from projects of less than one acre must be included in the program if:
    - that project is part of a larger common plan of development or sale; or
    - if controlling such activities in a particular watershed is required by the Department;
  - iii. *The City should include a law, ordinance or other regulatory mechanism to require post-construction runoff controls from new development and re-development projects to the extent allowable under State or local law that meet the State's most up-to-date technical standards.*
  - iv. includes a combination of structural management practices (including, but not limited to practices from the NYS Stormwater Management Design Manual or equivalent) and / or non-structural management practices (including, but not limited to comprehensive plans, open space preservation programs, Low Impact Development (LID), Better Site Design (BSD) and other Green Infrastructure practices, land use regulations) appropriate for the permittee that will reduce the discharge of pollutants to the MEP. Permittees are encouraged to implement Green Infrastructure practices at a site level and to review, and revise where appropriate, local codes and laws that include provisions that preclude construction that minimizes or reduces pollutant loadings.
    - if a stormwater management practice is designed and installed in accordance with the New York State Stormwater Management Design Manual or has been demonstrated to be equivalent and is properly operated and maintained, then MEP will be assumed

to be met for post-construction stormwater discharged by the practice;

v. describes procedures for SWPPP review that incorporate consideration of potential water quality impacts and review of individual pre-construction SWPPPs to ensure consistency with local post-construction stormwater requirements;

- ensure that the individuals performing the reviews are adequately trained and understand the State and local post construction stormwater requirements;
- ensure that the individuals performing the reviews for SWPPPs that include post-construction stormwater management practices are qualified professionals or under the supervision of a qualified professional;
- all SWPPPs must be reviewed for sites where the disturbance is one acre or greater; and
- after review of SWPPPs, the permittee must utilize the "SWPPP Acceptance Form" created by the Department and required by the SPDES General Permit for Stormwater Discharges from Construction Activity (GP-0-08-001) when notifying construction site owner / operators that their plans have been accepted and approved by the permittee;

vi. by May 1, 2009 establish and maintain an inventory of post-construction stormwater management practices within the permittees jurisdiction. At a minimum, include practices discharging to the small MS4 that have been installed since March 10, 2003, all practices owned by the small MS4, and those practices found to cause or contribute to water quality standard violations.

- the inventory shall include at a minimum: location of practice (street address or coordinates); type of practice; maintenance needed per the NYS Stormwater Management Design Manual, SWPPP, or other provided documentation; and dates and type of maintenance performed; and

vii. ensures adequate long-term operation and maintenance of management practices identified in Part VII.5.a.vi by trained staff, including inspection to ensure that practices are performing properly.

- The inspection shall include inspection items identified in the maintenance requirements (NYS Stormwater Management Design Manual, SWPPP, or other maintenance information) for the practice. Permittees are not required to collect stormwater samples and perform specific chemical analysis;

b. Develop, implement, and provide adequate resources for a program to inspect development and re-development sites by trained staff and to enforce and penalize violators;

c. Develop, record, periodically assess and modify as needed measurable goals; and

d. Select appropriate post-construction stormwater BMPs and measurable goals to ensure the reduction of all POCs in stormwater discharges to the MEP.

### 5.3 Methodology for Compliance with Permit Requirements

ECSD # 6 will be inspecting the sites for proper operation and maintenance and enforcing the permit requirements for properties that are not in compliance.

### 5.4 Best Management Practices:

#### 5.4.1 Stormwater Ordinance

##### Description / Methodology

The stormwater management ordinance establishes minimum stormwater management requirements and controls to protect the general health, safety, and welfare of the public. The ordinance addresses issues relating to:

- Erosion and Sediment Control
- Stormwater Design Requirements
- Construction Requirements
- Fees for municipal services relating to SWPPP reviews, inspections, and maintenance.

##### Annual Compliance Requirements

##### **Municipal Board**

Customize the ordinance to incorporate municipal requirements.

##### **Stormwater Management Officer & Municipal Board**

Revisions as needed.

Amend stormwater ordinance as necessary to maintain compliance with NYS Standards and Requirements.

#### 5.4.2 Inspection Program for Newly Developed and Redeveloped Sites

##### Description / Methodology

Develop an inspection program for newly developed and redeveloped sites for compliance with the post-construction regulations.

Develop a list of items to incorporate in the inspection of project sites based on the final post-construction runoff control regulations including consideration of the following:

- Construction of controls according to approved development plans and specifications.
- Adherence to any legal commitment to operate or maintain permanent stormwater quality structures.
- Conformance to open space and landscaping requirements.
- Conformance to local development standards.

Develop post-construction inspection forms and procedures.

Develop internal tracking procedures for tracking development projects that are under construction and/or have been completed.

Train inspection personnel on local post-construction runoff regulations and final inspection procedures.

Inspect qualifying project sites using adopted inspection forms and procedures to ensure conformance with local post-construction runoff regulations.

Issue enforcement actions to owners or operators of local development projects that are not in compliance with local post-construction runoff regulations.

Maintain records of development project site inspections, enforcement actions, and corrective actions performed by local development project owners.

Conduct SWPPP review for all sites within the MS4 Urbanized Area where the disturbance is one acre or greater to ensure consistency with State and local post-construction stormwater requirements;

- SWPPP Acceptance Form issued by NYSDEC, and required by the General Permit for Stormwater Discharges from Construction Activity (GP-0-08-001), must be signed prior to obtaining permit coverage to indicate plans have been accepted and approved by the MS4. The construction site owner / operators should include the signed SWPPP Acceptance Form with the NOI submitted to NYSDEC for Permit coverage.

#### Annual Compliance Requirements

##### **WNYSC**

Develop draft inspection forms and procedures necessary to inspect local new and re-development projects in order to ensure compliance with local post-construction runoff regulations and approved plans.

Produce the final version of the project inspection forms and procedures.

Train inspection personnel on local post-construction runoff regulations and final inspection procedures.

##### **Stormwater Management Officer**

By May 1, 2009, maintain an inventory of projects that qualify for inspection under local post-construction runoff regulations in accordance with GP-0-08-002 Part VII.A.5.a.vi.

Inspect qualifying development project sites using adopted inspection forms and procedures to ensure conformance with local post-construction runoff regulations in accordance with GP-0-08-002 Part VII.A.5.a.vii.

Issue enforcement actions to owners or operators of local development projects that are not in compliance with local post-construction runoff regulations.

Ensure SWPPP reviews are conducted by qualified professionals or supervised by qualified professionals

#### 5.5 *Required Reporting*

At a minimum, the permittee shall report on the items below:

- i. number of SWPPPs reviewed;
- ii. number and type of enforcement actions;

iii. number and type of post-construction stormwater management practices inventoried;

iv. number and type of post-construction stormwater management practices inspected;

v. number and type of post-construction stormwater management practices maintained;

vi. regulatory mechanism status - certification that regulatory mechanism is equivalent to one of the "NYSDEC Sample Local Laws for Stormwater Management and Erosion and Sediment Control" (if not already done); and

vii. report on effectiveness of program, BMP and measurable goal assessment;

## POLLUTION PREVENTION / GOOD HOUSEKEEPING FOR MUNICIPAL OPERATIONS

### 6.1 Description of Minimum Control Measure

The Pollution Prevention / Good Housekeeping minimum control measure consists of Best Management Practices (BMPs) that focus on training and on the prevention or reduction of pollutant runoff from municipal operations. The BMPs describe the training program; specific municipal operations that are impacted by the proposed operation and maintenance programs (BMPs); maintenance activities, schedules and long term inspection procedures for controls to reduce floatables and other pollutants; controls for reducing or eliminating the discharge of pollutants from streets, roads, highways, municipal parking lots, maintenance and storage yards, waste transfer stations, fleet or maintenance shops with outdoor storage areas, and salt/sand storage locations; procedures for the proper disposal of waste removed from the MS4 and municipal operations, including dredge spoil, accumulated sediments, floatables and other debris.

### 6.2 General Permit Requirements

*ECSD # 6 will, at a minimum:*

- a. Develop and implement a pollution prevention / good housekeeping program for municipal operations and facilities that:
  - i. addresses municipal operations and facilities that contribute or potentially contribute POCs to the ECSD # 6 system. The operations and facilities may include, but are not limited to: street and bridge maintenance; winter road maintenance; stormwater system maintenance; vehicle and fleet maintenance; park and open space maintenance; municipal building maintenance; solid waste management; new construction and land disturbances; right-of-way maintenance; marine operations; hydrologic habitat modification; or other;
  - ii. at a minimum frequency of once every three years, perform a self assessment of all municipal operations addressed by the SWMP to:
    - determine the sources of pollutants potentially generated by the permittee's operations and facilities; and
    - identify the municipal operations and facilities that will be addressed by the pollution prevention and good housekeeping program, if it is not done already;
  - iii. determines management practices, policies, procedures, etc. that will be developed and implemented to reduce or prevent the discharge of (potential) pollutants. Refer to management practices identified in the "NYS Pollution Prevention and Good Housekeeping Assistance Document" and other guidance materials available from the EPA, State, or other organizations;
  - iv. prioritizes pollution prevention and good housekeeping efforts based on geographic area, potential to improve water quality, facilities or operations most in need of modification or improvement, and permittee's capabilities;
  - v. addresses pollution prevention and good housekeeping priorities;

Comment [MCR16]: As per GP-0-08-002

vi. includes an employee pollution prevention and good housekeeping training program and ensures that staff receive and utilize training;

vii. requires third party entities performing contracted services, including but not limited to street sweeping, snow removal, lawn / grounds care, etc., to meet permit requirements as the requirements apply to the activity performed ; and

viii. requires municipal operations and facilities that would otherwise be subject to the NYS Multisector General Permit (MSGP, GP-0-06-002) for industrial stormwater discharges to prepare and implement provisions in the SWMP that comply with Parts III. A, C, D, J, K and L of the MSGP. The permittee must also perform monitoring and record keeping in accordance with Part IV. of the MSGP. Discharge monitoring reports must be attached to the annual report. Those operations or facilities are not required to gain coverage under the MSGP. Implementation of the above noted provisions of the SWMP will ensure that MEP is met for discharges from those facilities;

b. Develop, record, periodically assess and modify as needed measurable goals; and

c. Select appropriate pollution prevention and good housekeeping BMPs and measurable goals to ensure the reduction of all POCs in stormwater discharges to the MEP.

### 6.3 Methodology for Compliance with Permit Requirements

The WNYSC has developed a guidance document for use by each participating MS4 that identifies the BMPs to reduce and prevent discharge of pollutants to the maximum extent practicable from municipal activities. The WNYSC will provide training to the municipal personnel of participating MS4s. These personnel will be responsible for implementing the BMPs in their everyday activities.

Comment [MCR17]: Deleted text

### 6.4 Best Management Practices

#### 6.4.1 Municipal Training Program

##### Description / Methodology

Develop a program that provides training to each member of the municipality whose work may potentially impact stormwater. This includes highway, water, buildings and grounds, sewer, parks, and recreation departments. The training program will be developed such that one or two members of each municipality are trained through the WNYSC. These individuals will then become responsible for training the remaining members of their municipality.

##### Annual Compliance Requirements

##### **WNYSC**

Conduct training sessions for the municipal employee(s) that have been designated for teaching the remaining members of the municipality.

### **Stormwater Management Officer**

Provide refresher training for employees

Train all (new) municipal employees whose job duties (will) involve work pertaining to all municipal operations that have the potential to affect stormwater runoff – identify new BMPs, develop/modify inspection checklists, develop/implement SOP's

#### **6.4.2 Landscaping and Lawn Care**

##### Description / Methodology

Reduce the discharge of pollutants from permittee owned facilities through better mowing and landscaping maintenance practices.

Develop an inventory of landscaping and lawn care areas that are owned by the permittee.

Evaluate current landscaping and lawn care activities in order to identify opportunities to reduce the discharge of the following:

- Fertilizers
- Leaf litter and tree trimmings
- Litter and floatable materials
- Equipment fluids

Ensure that proper litter collection is scheduled prior to any mowing activities.

Use all herbicides, pesticides, and fertilizers in accordance with manufacturers' instructions for application rates and quantities.

Purchase only enough lawn care products necessary for one year – store properly to avoid waste generation (spills, leaks).

Use slow release or naturally derived (organic) fertilizers.

Train employees in the proper application of lawn care products.

Evaluate methods for containing and/or composting trimmings and grass clippings.

Develop zero input/low input lawns.

Consider alternative landscape techniques (i.e. naturescaping, xeriscaping).

Plant trees away from sewer lines or other underground utilities.

Use drip irrigation techniques for landscaping.

Water plants with runoff collected from roof downspouts.

Report annually on the activities conducted under this program.

Annual Compliance Requirements

**Stormwater Management Officer/ Sewer District Managers**

Review monitoring and maintenance program and revise as necessary.

Maintain/update as necessary an inventory of all municipally owned lands that are/will be subject to landscaping and lawn care activities.

6.4.3 *Vehicle/Equipment Maintenance*

Description / Methodology

Develop and maintain an inventory of municipally owned vehicles.

Maintain vehicles according to manufacturer's specifications,

Require vehicle operators to conduct daily inspections of vehicles to identify fluid leaks, schedule repairs, and eliminate leaks.

Conduct maintenance indoors whenever possible.

For maintenance performed outside, guard against spillage of materials that could discharge to storm receivers.

If possible, seal floor drains that discharge directly to the environment. If not possible, obtain wastewater discharge permits from regulatory agency.

Initiate single purpose use of vehicle bays – dedicate one (or more) bays that have no (or sealed) floor drains for repairs/maintenance

Clean up spilled materials immediately, using “dry” methods

Install pretreatment systems (oil/water separators) where necessary in sewer lines to capture contaminants (oil, grit), and maintain as needed

Never leave vehicles unattended while refueling

Identify appropriate recycling/disposal options for wastes

Maintain vehicle maintenance records and document fluid leak repair activities.

Review vehicle inspection and maintenance records on an annual basis to evaluate conformance to vehicle manufacturer service specifications.

Annual Compliance Requirements

**Stormwater Management Officer / Sewer District Manager**

Review vehicle inspection and maintenance records to evaluate conformance to vehicle manufacturer service specifications and local stormwater program requirements.

Maintain/update as necessary an inventory of all municipally owned vehicles and equipment.

#### 6.4.4 *Vehicle/Equipment Washing*

##### Description / Methodology

Wash vehicles and equipment using methods to prevent discharge of pollutants to the municipal storm sewer system or local waterbodies.

Initiate single purpose use of vehicle bays - dedicate only one bay for washing (with floor drain system).

Perform cleaning with pressurized cold water, without the use of soaps, if wastewaters will flow to a storm sewer system.

Use minimal amounts of biodegradable soaps only if wastewaters will discharge to a sanitary sewer system.

Rinse with hoses that are equipped with automatic shutoff devices and spray nozzles.

Steam clean (without soap) where wastes can be captured for proper disposal (i.e. oil/water separator).

Comment [MCR18]: Change in format

##### Annual Compliance Requirements

###### **Stormwater Management Officer / Sewer District Manager**

Inspect floor drain systems regularly – use only those that discharge to a sanitary sewer or those that are permitted by the regulatory agency. Identify the need for cleaning of catch basins, oil/water separators.

Perform steam cleaning or pressure washing where wastes can be captured for proper disposal.

Maintain/update as necessary an inventory of all vehicles and equipment.

#### 6.4.5 *Building Maintenance*

##### Description / Methodology

Conduct building maintenance activities so that runoff does not impact the stormwater systems and/or local water bodies.

Develop a list of the maintenance activities required inside and outside of each municipal building.

Identify which activities have an impact on stormwater.

Develop mitigation measures for each activity that impacts stormwater.

Review the maintenance activity list on an annual basis to determine if any improvements are necessary.

Annual Compliance Requirements

**Stormwater Management Officer / Sewer District Manager**

Implement the mitigation measures for each activity.

Review the maintenance activity list and update as necessary.

Review the mitigation measures for each activity and revise as necessary.

Maintain/update as necessary an inventory of all facilities and material storage areas.

6.4.6 *Hazardous and Waste Materials Management*

Description / Methodology

Prevent the discharge of hazardous and waste materials from impacting municipal stormwater systems and local waterbodies.

Ensure that all materials are stored in closed, labeled containers – if stored outside, drums should be placed on pallets, away from storm receivers – inside storage areas should be located away from floor drains.

Eliminate floor drain systems that discharge to storm drains, if possible.

Use a pretreatment system to remove contaminants prior to discharge.

Reduce stock of materials “on hand” – use “first in/first out” management technique.

Use the least toxic material (i.e. non hazardous) to perform the work.

Install/use secondary containment devices where appropriate.

Eliminate waste generation (i.e. reincorporate coating/solvent mixtures into the original coating material for reuse).

Recycle materials if possible, or ensure proper disposal of wastes

Comment [MCR19]: Change in format

Annual Compliance Requirements

**Stormwater Management Officer / Sewer District Manager**

Implement plan for proper storage of all hazardous and waste materials.

Verify that floor drains have been sealed (or redirected to sanitary sewer).

Inspect material storage areas (inside and outside).

Ensure timely cleaning of oil/water separators by qualified contractor.

Inspect stormwater discharge locations (for contaminants, soil staining, plugged discharge lines).

Repair or replace any leaking/defective containers, and replace labels as necessary.

Maintain caps and/or covers on containers.

Maintain aisle space for inspection of products/wastes.

Maintain/update as necessary an inventory of all facilities and material storage areas.

#### Additional Information / Resources

Refer to the Appendix for Guidance Documents and Inspection Checklists regarding Pollution Prevention/Good Housekeeping for Municipal Operations.

#### 6.4.7 *Spill Response and Prevention*

##### Description / Methodology

Review spill response procedures to ensure stormwater quality protection measures are considered during spill response.

Conduct employee training

Maintain spill prevention equipment.

Keep all materials properly stored in closed, labeled containment systems.

Use secondary containment systems where appropriate

##### Annual Compliance Requirements

##### **Stormwater Management Officer / Sewer District Manager**

Inspect secondary containment systems and oil/water separators

Inspect containers for leaks, areas near storm receiver inlets and outlets, floor drains for indication of spills.

Pump out oil water separators as needed.

Protect drains with oil absorbent materials

Clean out receivers on regular schedule

Remove spilled salt from salt loading area

Comment [MCR20]: Change in format

6.4.8 *Catch Basin and Storm Drain System Cleaning*

Description / Methodology

Reduce sediment and floatable materials discharges by routinely cleaning municipal catch basins and stormwater inlet structures.

Identify areas where catch basins, surface inlets, and/or storm sewer manholes should be more frequently cleaned to reduce discharge of floatable materials, sediment, and other materials.

Develop a preliminary schedule for cleaning inlet structures, catch basins, and manholes.

Implement the catch basin cleaning program according to the developed schedule.

Evaluate the catch basin cleaning schedule on an annual basis.

Address storm drain receivers and (below grade) storm sewer systems, - parking lot receivers, and open ditches.

Catch basins and floor drain systems inside of buildings should be either:

- Sealed to prevent discharge
- Permitted by NYSDEC
- Discharged to sanitary sewers

Comment [MCR21]: Change in format

Repair/replace storm drain receiver and catch basin receiver grates as necessary.

Annual Compliance Requirements

**Stormwater Management Officer / Sewer District Manager**

Implement the catch basin cleaning program according to the developed schedule.

Evaluate the catch basin cleaning program to identify improvements and/or modifications.

Maintain/update as necessary an inventory of all municipally owned infrastructure – it is essential to include underground infrastructure (i.e. septic systems, UST's, oil/water separators, catch basins/sewers, etc.)

6.4.9 *Pest Control*

Description / Methodology

Reduce the discharge of pesticides from municipal facilities as they may harm aquatic life and may contaminate local water bodies and sediment.

Develop an inventory of areas designated for pesticide application including the following:

- Area of application
- Type of pesticide applied
- Purpose of application
- Prepare a pesticide application schedule.

Comply with local, state, and federal regulations associated with pesticide application, e.g. licensing regulations.

Comment [MCR22]: Change in format

Purchase only enough pesticides necessary for one year – store properly to avoid waste generation (spills, leaks, product deterioration).

Minimize/eliminate pesticide application, use lowest toxicity pesticides

Track the volume and type of pesticide applied at each location.

Do not apply pesticides immediately prior to or during rain events

Ensure that employees are properly trained and certified in pesticide application techniques and safety

Develop zero input, low input lawns

Eliminate food, water, and shelter for pests

Adopt integrated pest management (IPM) techniques

Adopt alternatives to pesticides options (use physical, mechanical, or biological controls)

#### Annual Compliance Requirements

#### **Stormwater Management Officer / Sewer District Manager**

Review pesticide application at all facilities/lands and incorporate new methodologies for application, or determine if pesticide application can be discontinued at sites.

### **6.5 Reporting Requirements**

At a minimum, the permittee shall report on the items below:

Indicate the municipal operations and facilities that the pollution prevention and good housekeeping program assessed;

Describe, if not done so already, the management practices, polices and procedures that have been developed, modified, and / or implemented and report, at a minimum, on the items below that the permittee's pollution prevention and good housekeeping program addressed during the reporting year:

- number of catch basins inspected and, where necessary, cleaned;

- pounds of pesticides / herbicides applied as pure product.

Staff training events and number of staff trained; and

Report on effectiveness of program, BMP and measurable goal assessment. If the pollution prevention and good housekeeping program addresses other operations than what is listed above in Part VII.A.6.a(ii), the permittee shall report on items that will demonstrate program effectiveness.

General Practices for the Pollution Prevention/Good Housekeeping Program

Assess/identify modified (or new) municipal operations to identify changes in operations that affect stormwater runoff, and develop/implement new BMPs or modify existing BMPs to prevent the discharge of pollutants from municipal operations.

Adjust monitoring and maintenance programs as necessary.