STORMWATER MANAGEMENT PLAN
[SWMP]

FOR

ERIE COUNTY SEWER DISTRICT NO. 6

SPDES No. NYR20A069

MUNICIPAL SEPARATE STORM SEWER SYSTEM [MS4]

General Permit No. GP-0-15-003

January 2016

INTRODUCTION

The Erie County Sewer District No. 6 (ECSD #6) Stormwater Management Program (SWMP) 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. This SWMP Plan providing policy and management guidance to the ECSD #6 personnel and involved entities.

The SWMP 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. Both the City of Lackawanna and Erie County Sewer District No. 6 have the same geographical boundaries. There are six program elements designed to reduce the discharge of pollutants to the maximum extent practicable. The City of Lackawanna is responsible for all 6 MCMs while Erie County Sewer District No. 6 is responsible for MCMs 1,2,3 & 6. The Minimum Control Measures (MCM) are as follows:

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 General Permit are described in the plan. For each Best Management Practice, responsibilities to achieve and sustain compliance are clearly defined. Erie County Sewer District No. 6 is a member of WNY Coalition for Storm Water. The first two MCMs are fulfilled through the collective efforts with the Western New York Storm water Coalition. Completion of MCMs 3 and 6 are the responsibility of Erie County Sewer District No. 6.
As land use is controlled by the City of Lackawanna, MCMs 4 and 5 are addressed by the City of Lackawanna.

As ECSD No. 6 owns, maintains and operates only the storm sewer pipes including outfalls, receivers (drainage inlets), storm manholes and storm pumping stations. The City of Lackawanna as a municipality that has the same boundaries as ECSD No. 6 enforces all aspects of the MS4 SPDES permit including all Minimum Control Measures.

Certain components of this program have been codified into the ECSD # 6 Rules and Regulations for MS4. These Rules and Regulations were amended and adopted by the ECSD No. 6 and the Erie County Legislature at the 18th session on October 11, 2007 (Reference Comm. 16E-37 (2007).

This SWMP Plan is updated on an annual basis in order to take into consideration the latest technologies and information to maintain compliance with said 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.

City - City of Lackawanna

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 storm water unless authorized by a NPDES permit or otherwise excluded from regulation.

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

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 and/or *Rules and Regulations*- 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 Unites 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.

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, 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

BMPs – Best Management Practices

CWA – Clean Water Act

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

SWMPP – Stormwater Management Program 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 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 Pollutants of Concern (POCs). All materials are generated and distributed by the WNY Stormwater Coalition (WNYSC).

1.2 General Permit Requirements

The ECSD No. 6 will continue to:

a. Identify POCs, geographic areas of concern and target the right audience;

b. Implement an ongoing public education and outreach program as developed by the WNYSC. This implementation is designed to describe to the general public and target audiences:

i. the impacts of storm water discharges on water bodies;
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.

The exempt non-stormwater discharges are defined in the MS4 General Permit (GP-0-15-002) Part I.A.2 and the Erie County Sewer District No. 6 Rules and Regulations for Stormwater. They include the following:

- 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
- Footing drains

- 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
- De-chlorinated swimming pool discharges
- Residual street wash water
- Discharges or flows from fire fighting activities
- De-chlorinated water reservoir discharges
- Any SPDES permitted discharge

Even if these exempted non-stormwater discharges are determined not to be substantial contributors of pollutants, the ECSD #6 in conjunction with the WNYSC will continue developing materials for public education aiming to reduce pollutants from these exempted discharges.

1.3 Methodology for Compliance with Permit Requirements

The WNYSC has developed many of the BMPs necessary for this MCM. These include development of brochures, posters, webpages, education packages, and a display for community events as well as recommendations for dissemination. These BMPs will be updated by the WNYSC on an annual basis and made available to ECSD No. 6.

1.4 Best Management Practices

1.4.1 Identification of POCs, Waterbodies of Concern, Geographic Areas of Concern, Target Audiences

Description/Methodology

The ECSD #6 has identified the following POCs as targets for public education: sediment/silt and phosphorous. The ECSD #6 has identified the following target audiences for the public education and outreach program: households; developers, contractors; and small businesses. The ECSD #6 storm sewer consists of 50 miles of pipe and 50 outfalls. Inspection of these outfalls will be scheduled based on geographic areas of concern such as commercial and light industrial areas.
The Waterbodies of Concern are Smokes Creek and Lake Erie.

1.4.2 Public Education Printed Materials

Description / Methodology

Development of printed public education materials to address stormwater pollution prevention for the general public, target businesses/activities and schools is an ongoing endeavor for the WNYSC. Thirteen brochures and two posters 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
- Your Septic System: How It Functions & How to Care For It
- Pick Up Your Pet Waste
- Rain Gardens: A How-To Guide
- Pollution Begins and Ends with You (poster)
- What is Stormwater? What Can You Do? (poster)
- Illicit Discharge Detection and Elimination: A Citizen's Guide to Identifying and Preventing Stormwater Pollution

Additional brochures will continue to be developed for topics such as: POCs and their sources, post-construction practices, and erosion and sediment control.

Brochures are distributed during the public outreach events, in public access areas of municipal buildings, at seminars/conferences and via other educational programming. Posters are typically displayed at municipal buildings and public libraries

The brochures and posters are available on the WNYSC webpage along with information for businesses, municipalities, schools, and the general public.

Annual Compliance Requirements

WNYSC
Distribute brochures at public outreach events.

Distribute Household Guide and posters to all public libraries.

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

Update educational materials and distribute to MS4s.

Maintain records of number of educational materials distributed.

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Stormwater Management Officer
Display public education materials in District's office.

Inventory existing stock of brochures and replenish as needed.

Check posters for damage and outdated information. Replace outdated or damaged posters with new posters as they become available from the WNYSC.

Maintain records of number of educational materials distributed.

1.4.3 Stormwater Webpage

Description / Methodology

The Erie County Department of Environment and Planning hosts a webpage on behalf of the WNYSC to educate the public on the impacts of stormwater runoff on local waterbodies (www.erie.gov/stormwater). The WNYSC webpage addresses the following topics:

- Water quality impacts of stormwater runoff to local water bodies;
- Public education materials, instructional resources and BMP-related work products for each Minimum Control Measure;
- Stormwater contact information for each MS4 in the WNYSC

The WNYSC has developed suggested content for MS4s to post on their web sites to educate their residents on stormwater pollution and to relay information and initiatives that are specific to their respective MS4 community. Individual webpages are strongly encouraged as the internet is an excellent tool for disseminating information, involving the public in the SWMP and soliciting public comment on the SWMP Plan and Annual Report.

Annual Compliance Requirements

WNYSC
Update and post new information to the webpage as necessary.

Stormwater Management Officer
Update and maintain the MS4 webpage as necessary.
The SWMP is available online at www.erie.gov/DSM

1.4.4 K-12 Education Packages

Description / Methodology

The WNYSC assembled an age appropriate K-12 Education Package for distribution to local educators in order to foster an early age respect for the environment. The packages include lesson plans and stormwater public education brochures as well as information pertaining to the environmental education services available to local educators regarding stormwater quality issues. Education materials are 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 as needed.

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

1.4.5 Public Education Display and Plaque

Description / Methodology

A variety of public education displays, addressing general stormwater pollution prevention and rain gardens, have been developed for use by the MS4s to satisfy their public outreach requirements. In fact, each MS4 has a two-sided banner display, a wall-mounted plaque and a brochure holder for their individual public education and outreach activities. Additional displays are maintained by the WNYSC. Among the displays available, there are several messages to convey. Printed public education materials, an Enviroscape watershed model, stormwater quiz cards, a prize wheel and promotional items augment the displays and allow the target audiences to take the stormwater message home. Venues for use of the display include: community events, municipal buildings, libraries, public meetings and employee trainings

Annual Compliance Requirements

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

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

Stormwater Management Officer
Incorporate stormwater public education at the local level on at least two occasions per year.

Display stormwater plaque in prominent location in municipal hall.

1.4.6 Stormwater Video

Description / Methodology

The WNYSC created a short video and three public service announcements (PSAs) addressing stormwater pollution prevention efforts in the Western New York MS4 area. The video is for public education and outreach at events such as public meetings, in schools and where feasible, at community events. The video and PSAs are available on the WNYSC webpage (www.erie.gov/stormwater).

Annual Compliance Requirements

WNYSC
Post the video and PSAs on the WNYSC webpage.

Utilize the video and PSAs at public meetings, in schools and at community events.

Maintain records pertaining to DEP use of the video and PSAs.

Stormwater Management Officer
Utilize the video and PSAs at public meetings, in schools and at community events.

Maintain records pertaining to use of the video and PSAs.

1.5 Required Reporting

The ECSD No. 6 will utilize the NYSDEC's template for Annual Reports. The following will be included:

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 the General Permit;
- construction site stormwater control training planned or completed, as required by the General Permit; and
- employee pollution prevention / good housekeeping training planned or completed, as required by the General Permit; and

To facilitate shared annual reporting, if the education and outreach activities above are implemented by a third party, and the third party is completing the associated portions of the annual report, that third party may report on the education and outreach activities within MCM 1 of the annual report and not within the MCMs that the education and outreach activities are required by;

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

d. maintain records of all training activities.

SECTION 2 - PUBLIC INVOLVEMENT / PARTICIPATION

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 facilitate public participation. The BMPs include a number of practices designed to seek public input on the SWMP Plan and the Annual 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

The ECSD No. 6 continues to:

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;
- provide the opportunity for the public to participate in the development, implementation, review, and revision of the SWMP.

c. Have a Local stormwater public contact.
The name or title of the contact and the telephone number are published in public outreach and public participation materials and kept updated with the Department on the MCC form;

d. Present the Annual report to the public.
Below are the highlights 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.), ECSD #6 presents 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 is 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); or
- on the internet by:
  - the annual report is available to the public on a website;
  - providing the public the opportunity to provide comments on the internet or otherwise; and

ii. provide public notice about the presentation, making public the following information when noticing the presentation in accordance with the 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. This general SPDES permit does not require a specified time frame for public comments, although it is recommended that permittees do provide the public an opportunity to comment for a period after the meeting. 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 the SWMP plan are available for public inspection;

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

f. Select and implement 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, the ECSD No. 6 will 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's public meetings, incorporating a feedback mechanism into the webpage and community cleanup events.

2.4 Best Management Practices

2.4.1 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 stormwater requirements and how the group may assist with their local MS4 Stormwater Management Program.

2.4.2 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 bi-monthly WNYSC meetings.

Assist with public education and public involvement activities.

Plan and staff community cleanup events.

Review the Draft Annual Report of the WNYSC and MS4s.

Annual Compliance Requirements

WNYSC
Interact with EMCs, Buffalo Niagara Riverkeepers, CCE, and ECWQC and encourage their support/participation 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.

2.4.3 *Public Participation in the Stormwater Management Program*

Description / Methodology

To provide the public with an ongoing opportunity to participate in the development, implementation, review and revision of the SWMP Plan, MS4s will make the SWMP Plan available in areas where the public has access and/or on the internet. Public access areas include, but are not limited to, municipal buildings and public libraries. Included with the SWMP Plan will be information pertaining to how the public can participate. The SWMP Plan will also be presented annually, and at that time, the public will be informed of their opportunity to participate in the SWMP.

Annual Compliance Requirements

Stormwater Management Officer
Provide an opportunity for continuous public inspection of the SWMP Plan. Present the SWMP Plan once per year, ideally with the draft Annual Report at a public meeting.

2.4.4 Open WNYSC Meetings to Reach Key Groups and Individuals and Promote Public Involvement Opportunities

Description / Methodology

Twice per year, the WNYSC will schedule open meetings 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, environmental groups and the general public are targets for attendance. The meetings will be used to solicit input from those key individuals and groups on the SWMP Plan, the Annual Report and to publicize opportunities for public participation and involvement. The meetings will be hosted by the WNYSC membership.

Annual Compliance Requirements

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

Stormwater Management Officer
Bi-Annual: Assist the WNYSC by promoting the meeting to key individuals and groups within the MS4 and by attending the meeting.

2.4.5 *Public Involvement/Participation Activities*

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 County and continuously by Niagara County; 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
Ensure at least one stream or roadway cleanup occurs per year or schedule and publicize a community-wide clean up day.

Have information on local cleanup opportunities available at the office of the ECDEP or local Stormwater Management Officer. Also, advertise these events on the town and/or county webpage.

2.4.6 *Provide Public Comment Mechanism on Webpage*

Description / Methodology

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

Annual Compliance Requirements

WNYSC
Maintain WNYSC stormwater webpage feedback mechanism for residents to document their input/comments on the SWMP.

Document input/comments received, and actions taken.

Stormwater Management Officer
For MS4s with their own Stormwater webpages:
Maintain MS4 stormwater webpage feedback mechanism for residents to document their input/comments on the MS4 stormwater management program.

Document input and comments received, and actions taken.

2.4.7 Identify Local Stormwater Public Contact

Description / Methodology

Designate 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. A consultant cannot be appointed as Stormwater Management Officer.

Annual Compliance Requirements

Stormwater Management Officer
Provide contact information with public review documents, such as SWMP Plan and Annual Reports, and on a web page dedicated to stormwater. Go to www.erie.gov/DSM/education.

2.4.8 *Annual Report Presentation*

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 will 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. See Section 2.4.4 above.

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.

2.5 Required Reporting

At a minimum, ECSD #6 reports 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.

2.6 Additional BMPs for Consideration

2.6.1 Storm Drain Stenciling

Description / Methodology

Stenciling of stormwater inlet structures with messages related to stormwater quality issues.

- Identify target areas or streets to be included in the storm drain stenciling program.
- Identify groups that may be willing to participate in the storm drain stenciling program including consideration of the following groups:
  - Local boy and girl scout organizations
  - Local school groups
  - Local fund raising groups
  - Other civic organizations
- Develop slogans, logos, and/or text for stenciling stormwater inlet structures.
- Invite targeted groups to participate in the storm drain stenciling program.
- Provide necessary support for volunteer storm drain stenciling groups, e.g. stencils, paint, rollers, traffic control, safety equipment, trash bags, and landfill access or bulk litter collection.
- Maintain records of storm drain stenciling and volunteer participation.
- Annually report on number of storm drains stenciled by volunteers.

Stormwater Management Officer
Identify target areas or streets to be included in the storm drain stenciling program.

Invite targeted groups to participate in the storm drain stenciling program.

SECTION 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 storm sewer 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

The ECSD No. 6 will continue to:

a. Develop, implement and enforce a program to detect and eliminate illicit discharges as defined in the General Permit ;

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;
- the preliminary boundaries of the permittee's storm sewer sheds 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

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 the County Rules and Regulations for Stormwater, illicit discharges into the ECSD #6 storm sewer system and implement appropriate enforcement procedures and actions.

The Rules and Regulations were reviewed by the County attorney representing the ECSD #6 as being equivalent to the State's model illicit discharge local law.

g. Develop and implement a program to detect and address non-stormwater discharges, including illegal dumping, to the small MS4in accordance with current assistance and guidance documents from the State and EPA.. The program must include: procedures for identifying priority areas of concern (geographic, audiences, or otherwise) for the 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, and maintain records of notification

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

The WNYSC developed a GIS-based map of outfalls in the MS4 Urbanized Areas of Erie and Niagara Counties. For each outfall mapped a dataset can be accessed. The WNYSC Outfall Locator map is maintained by Erie County DEP's Office of GIS Services.

In partnership with Buffalo State College, an Illicit Discharge Trackdown 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.

To prohibit illicit discharges to the MS4 and establish enforcement procedures, NYS's Model Local Law to Prohibit Illicit Discharges, Activities and Connections to Separate Storm Sewer Systems was adopted by the member municipalities of the WNYSC.

3.4 Best Management Practices

3.4.1 Outfall Mapping

Description / Methodology

Outfall Map

The WNYSC has a shared GIS Outfall Locator map that is housed by the Erie County Department of Environment and Planning's Office of GIS Services (http://gis1.erie.gov/ENSSO/). The map includes outfalls for the entire Western New York Urbanized Area. Each outfall point can be queried to obtain specific data including its identification number, photo, surface water discharge point, physical attributes, observations at the time of inspection and GPS coordinates. These data can be printed in report format directly from the website.

Preliminary Storm Sewershed Boundaries

The Outfall Locator map has an optional layer to depict Preliminary Storm Sewershed boundaries which are essentially watersheds, basins and sub-basins that, when displayed along with the outfall data, may help to define the drainage

area for a given outfall. Once an illicit discharge is detected at a specific outfall, the existing basin information and boundaries will be used to define the potential area where the source is located. The ECSD #6 reviewed the storm sewer system drawings and plans and defined the sewershed associated with each outfall.

Storm Sewer System Mapping

The ECSD no. 6 storm sewer mapping is in place.

Annual Compliance Requirements

Erie County DEP
Manage GIS data and web-based mapping system to ensure MS4 access to maps.

Additional Information / Resources

U.S. EPA: Illicit Discharge Detection and Elimination: A Guidance Manual for Program Development and Technical Assessment

WNYSC: Illicit Discharge Track Down Protocol and Sampling Procedure

3.4.2 Outfall Reconnaissance Inventory (ORI)

Description / Methodology

The ECSD No. 6 conducts an Outfall Reconnaissance Inventory, essentially a dry weather inspection, of its storm sewer outfalls at a rate of approximately 20% per year or 100% over a five year period. The ORI will be conducted according to procedures set forth in the WNYSC's Illicit Discharge Track Down Protocol and Sampling Procedure guidance document which is based on EPA guidance.

Inherent in the ORI process are opportunities for the MS4 to field verify outfall locations (required), update existing data, add outfalls that are newly discovered or newly constructed (required) and prioritize outfalls for illicit discharge follow up.

All updates to the WNYSC's Outfall Locator Map, which is located on the Erie County Geographic Information System Internet Server, will be made by Erie County's GIS staff upon request by the MS4. The MS4 requesting modification of their outfall must complete a Stormwater Outfall Map Update Request form (provided in the Appendix) and submit it to EC DEP/ECS. The MS4 should attach a copy of the ORI completed in full for new outfalls or with new information highlighted for existing outfalls.

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.

Additional Information / Resources

Refer to Appendix for the following information:

WNYSC: Illicit Discharge Track Down Protocol and Sampling Procedure

Outfall Reconnaissance Inventory

Guidance for Prioritizing Stormwater Outfalls

Stormwater Outfall Map Update Request

3.4.3 Local Ordinance Prohibiting Illicit Discharges into the ECSD #6 storm sewer system

Description / Methodology

The ECSD No. 6 Stormwater *Rules and Regulations* are in place and prohibits illicit discharges and implements enforcement procedures and actions as required under the General Permit. The *Rules and Regulations* are equivalent to New York State's Model Local Law to Prohibit Illicit Discharges, Activities and Connections to Separate Storm Sewer Systems and be certified as such by the County.

The Erie County Sewer District No. 6 formally adopted NYS's Model Local Law to Prohibit Illicit Discharges, Activities and Connections to Separate Storm Sewer Systems on Otober 11, 2007.

Annual Compliance Requirements

Stormwater Management Officer
The *Rules and Regulations of ECSD No. 6* has been submitted to:

NYSDEC- Division of Water
270 Michigan Avenue
Buffalo, NY 14202

NYSDEC – Division of Water
625 Broadway
Albany, NY 12233-3505

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

Revise enforcement action procedures as needed.

3.4.4 Pollutant Source Tracking Procedures

Description / Methodology

The WNYSC has developed an Illicit Discharge Track Down Protocol and Sampling Procedure guidance document to detect and address non-stormwater discharges, including illegal dumping. The guidance includes:

- Sampling procedures

- Lab analysis and results interpretation
- Protocol to track down the sources of pollution and provide sufficient evidence to pursue elimination and remediation of the illicit discharge.

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 Model Local Law to Prohibit Illicit Discharges, Activities and Connections to Separate Storm Sewer System. (Refer to Section 3.4.3)

3.4.5 Public Education on Hazards Associated with Illegal Discharges

Description / Methodology

The public education materials developed to comply with the Public Education requirement in the General Permit include target audiences and provisions to inform public employees, businesses and the general public of the hazards associated with illegal discharges and improper disposal of waste. Similarly, employee training programs, particularly the Pollution Prevention and Good Housekeeping for Municipal Operations training, include instruction on the hazards of illegal discharges as well as identification and prevention.

Annual Compliance Requirements

WNYSC
Update educational materials and distribute to all MS4s.

Maintain records of number of educational materials distributed.

Stormwater Management Officer
Display public education materials in District's office.

Maintain records of number of educational materials distributed.

Address hazards of illegal discharges in employee training programs

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, landscape irrigation, diverted stream flows, rising ground water, uncontaminated ground water infiltration [as defined at 40 CFR 35.2005(20)], uncontaminated ground water, discharges from potable water sources, foundation drains, air conditioning condensate, irrigation water, springs, water from crawl space or basement sump pumps, footing drains, 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 or wetlands, dechlorinated swimming pool discharges, residual street wash water, discharges or flows from fire fighting activities, dechlorinated water reservoir discharges, and any SPDES permitted discharge.

Annual Compliance Requirements

Stormwater Management Officer
Review non-stormwater discharge list as necessary such that no exempt stormwater discharge is a substantial contributor of pollutants.

3.5 Required Reporting

The ECSD No. 6 reports 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. regulatory mechanism status - certification that law is equivalent to the State's model IDDE law (if not already completed and submitted with an earlier annual report); and

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

SECTION 4 - CONSTRUCTION SITE RUNOFF CONTROL

The City of Lackawanna and ECSD No. 6 overlap and land use falls under the City's jurisdiction: this MCM will be enforced by the City.

SECTION 5 - POST-CONSTRUCTION STORMWATER MANAGEMENT

The City of Lackawanna and ECSD No. 6 overlap and land use falls under the City's jurisdiction: this MCM will be enforced by the City.

SECTION 6 - 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 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 generated by the MS4 and municipal operations including dredge spoil, accumulated sediments, floatables and other debris.

6.2 General Permit Requirements

The ECSD #6 will continue to:

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 small MS4 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 and document 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;

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) for stormwater discharges associated with industrial activities 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 will be attached to the ECSD #6 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. Evaluate and incorporate cost effective runoff reduction techniques and green infrastructure in the routine upgrade of the existing stormwater conveyance systems and municipal properties to the MEP. Some examples include replacement of closed drainage with grass swales, replacement of existing islands in parking lots with rain gardens, or curb cuts to route the flow through below grade infiltration areas or other low cost improvements that provide runoff treatment or reduction.

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

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

e. Adopt techniques to reduce the use of fertilizers, pesticides, and herbicides, as well as their potential impact to surface water.

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. Guidance and training pertaining to performing an environmental assessment of municipal operations and facilities that are addressed by the MS4 Pollution Prevention and Good Housekeeping program will also be provided by the WNYSC.

6.4 Best Management Practices

6.4.1 Implement Pollution Prevention/Good Housekeeping BMPs

Description / Methodology

The WNYSC has developed a Pollution Prevention /Good Housekeeping for Municipal Operations: Best Management Practices guidance document addressing seventeen BMPS that are relevant to municipal facilities and their typical day-to-day operations. Corresponding Standard Operating Procedures and checklists were also developed. See Sections 6.4.7 - 6.4.20 for detailed descriptions of the seventeen BMPs.

Annual Compliance Requirements

WNYSC
Update documents as needed.

Stormwater Management Officer
Review Pollution Prevention /Good Housekeeping for Municipal Operations: Best Management Practices document to identify BMPs relevant to MS4 facilities and operations.

Incorporate appropriate BMPs at municipal facilities.

Distribute BMPs to Department heads for posting in employee access areas.

Coordinate with Department heads regularly to ensure employees are trained on BMPs and documentation of implementation is current.

6.4.2 Develop an Inventory of Municipal Facilities and Operations

Description / Methodology

Develop an inventory of municipal facilities and operations that contribute or potentially contribute POCs to the MS4 system. Relevant BMPs from the WNYSC's Pollution Prevention /Good Housekeeping for Municipal Operations: Best Management Practices guidance document should be identified and prioritized.

Annual Compliance Requirements

Stormwater Management Officer
Review inventory annually and update as needed

6.4.3 Perform Environmental Self Assessment of All Municipal Operations Addressed by the SWMP

Description / Methodology

The WNYSC developed an outline, checklist and training program to assist MS4s with conducting an environmental self assessment.

Annual Compliance Requirements

WNYSC
Conduct on-site training sessions for the MS4 employee(s)

Stormwater Management Officer
Conduct Environmental Self Assessment for all municipal facilities and operations addressed by the SWMP at least once every three years.

Maintain records documenting compliance

6.4.4 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.

Training programs include: Pollution Prevention and Good Housekeeping for Municipal Operations, Performing an Environmental Self Assessment of Municipal Operations and Facilities, Identifying Green Infrastructure and Runoff Reduction Opportunities in Routine Municipal Upgrades

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 and implement SOP's

Reference Information

Periodically, search sources/documents for reference information to identify any new information pertaining to stormwater BMPs, and incorporate as necessary into existing municipal operations

Additional Information / Resources

Pollution Prevention /Good Housekeeping for Municipal Operations: Best Management Practices

Pollution Prevention /Good Housekeeping for Municipal Operations: Standard Operating Procedures

Inspection Checklists regarding Pollution Prevention/Good Housekeeping for Municipal Operations

Performing an Environmental Self Assessment of Municipal Operations and Facilities (Power Point presentation)

Performing an Environmental Assessment Outline

6.4.5 *Incorporate Cost Effective Runoff Reduction Techniques and Green Infrastructure in Routine Upgrades to MS4 and Municipal Properties*

Description / Methodology

For all routine upgrades to the existing stormwater conveyance system and municipal properties, runoff reduction techniques and green infrastructure practices must be considered and where cost effective, implemented to the MEP. Examples include replacement of closed drainage with grass swales, replacement of existing islands in parking lots with rain gardens, curb cuts to route the flow through below grade infiltration areas or other low cost improvements that provide runoff reduction or treatment.

Annual Compliance Requirements

WNYSC
None

Stormwater Management Officer
Coordinate with DPW, Highways, Buildings and Grounds Department heads regularly to ensure runoff reduction and green infrastructure opportunities are considered.

Reference Information

NYS Stormwater Management Design Manual

6.4.6 *Adopt Techniques to Reduce the Use of Fertilizers, Pesticides and Herbicides*

Description / Methodology

In order to minimize potential impacts to surface waters, MS4s need to reduce fertilizer, pesticide and herbicide use to the MEP.

Annual Compliance Requirements

WNYSC
None

Stormwater Management Officer
Inventory MS4 use of fertilizers, pesticides and herbicides and third party contracts.

Prioritize use of products and determine reduction or elimination of use.

Reference Information

NYS Stormwater Management Design Manual

6.4.6 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
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.

Additional Information / Resources

Guidance Documents and Inspection Checklists regarding Pollution Prevention/Good Housekeeping for Municipal Operations.

6.4.8 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
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

Additional Information / Resources

Guidance Documents and Inspection Checklists regarding Pollution Prevention/Good Housekeeping for Municipal Operations.

6.4.9 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).

Annual Compliance Requirements

Stormwater Management Officer
Superintendent of Highways / Director of Public Works
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.

Additional Information / Resources

Guidance Documents and Inspection Checklists regarding Pollution Prevention/Good Housekeeping for Municipal Operations.

6.4.10 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
Superintendent of Buildings & Maintenance
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.

Additional Information / Resources

Guidance Documents and Inspection Checklists regarding Pollution Prevention/Good Housekeeping for Municipal Operations.

6.4.11 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

Annual Compliance Requirements

Stormwater Management Officer
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

Guidance Documents and Inspection Checklists regarding Pollution Prevention/Good Housekeeping for Municipal Operations.

6.4.12 Operational By Products/Wastes

Description / Methodology

Prevent the potential for leaching of toxic and biological contaminants from reaching the municipal stormwater system or local waterbodies.

Post “no dumping” signs.

Illuminate area if possible.

Prevent access – erect barriers.

Identify the by products/wastes that should be recycled (i.e. paper, cardboard) or can be legally disposed of on municipal lands (i.e. deer carcasses) by referencing NYSDEC regulations (6NYCRR PART 360)

Annual Compliance Requirements

Stormwater Management Officer
Clean up and dispose of “illegally dumped” materials, trash/debris in accordance with environmental regulations.

Cut and remove vegetation from “dump areas”.

Regularly schedule inspections - for maintenance concerns

Coordinate with police for unscheduled patrolling of dump areas.

Maintain/update as necessary an inventory of all municipally owned lands – identify areas at which illegal dumping may occur, and patrol those areas.

Additional Information / Resources

Guidance Documents and Inspection Checklists regarding Pollution Prevention/Good Housekeeping for Municipal Operations.

6.4.13 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
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

Additional Information / Resources

Guidance Documents and Inspection Checklists regarding Pollution Prevention/Good Housekeeping for Municipal Operations.

6.4.14Catch 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

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

Annual Compliance Requirements

Stormwater Management Officer
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.)

Additional Information / Resources

Guidance Documents and Inspection Checklists regarding Pollution Prevention/Good Housekeeping for Municipal Operations.

6.4.15 Alternative Discharge Options for Chlorinated Water

Description / Methodology

Prevent the discharge of chlorinated water from impacting municipal stormwater systems and local waterbodies.

Dechlorinate pool water before any discharge, be it over land or to the sanitary sewer, or allow the "disinfectant" to dissipate with sunlight, use, etc. prior to discharge.

Use ultraviolet radiation or osmosis to disinfect water/wastewater.

Backwash water should be discharged to the sanitary sewer, if available – if not available, discharge water over vegetated areas, not to surface waters

Annual Compliance Requirements

Stormwater Management Officer
Obtain permission from the municipal POTW prior to discharging any chlorinated pool waters to a sanitary sewer system

Identify opportunities to change current maintenance practices to incorporate opportunities to abate the potential for stormwater contamination (i.e. change from disinfection with chlorine compounds to disinfection with osmosis, UV light).

Additional Information / Resources

Guidance Documents and Inspection Checklists regarding Pollution Prevention/Good Housekeeping for Municipal Operations.

6.5 Required Reporting

The ECSD No. 6 will report on the items below:

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

b. 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;

c. Staff training events and number of staff trained; and

d. 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 Section 6.2.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.

Incorporate costs for stormwater permit compliance (i.e. necessary infrastructure upgrades/capital improvements) when developing annual budgets.

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