

STORMWATER MANAGEMENT PLAN

[SWMP]

FOR



ERIE COUNTY SEWER DISTRICT NO. 6

TRADITIONAL NON-LAND USE CONTROL OPERATOR

SPDES No. NYR20A069

SPDES General Permit for Stormwater Discharges From

MUNICIPAL SEPARATE STORM SEWER SYSTEM

[MS4]

General Permit No. GP-0-24-001

EFFECTIVE - January 3, 2024

EXPIRATION – January 2, 2029

Dated: January, 2026

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ERIE COUNTY SEWER DISTRICT NO. 6

CONTACTS:

Stormwater Program Coordinator oversees the development, implementation, and enforcement of the SWMP; coordinates all elements of the SWMP to ensure compliance with this SPDES general permit; and develops and submits the Annual Report.

Name: Matt Salah, P.E.

Title: SR Coord. Sewer Construction Projects

Phone: (716) 858 - 6990

Email: matt.salah@erie.gov

Stormwater Management Officer for questions related to this Stormwater Management Program (SWMP) Plan, or to obtain compliance-related documentation cited throughout this document.

Name: Matt Salah, P.E.

Title: SR Coord. Sewer Construction Projects

Phone: (716) 858 - 6990

Email: matt.salah@erie.gov

Local point of contact to receive and respond to public concerns/complaints regarding stormwater management and compliance with permit requirements:

Name: Ben Noonan

Title: Asst. Sanitary Engineer

Phone: (716) 858 - 6974

Email: Benjamin.noonan@erie.gov

Name: David Hojnacki

Title: Sewer District Manager

Phone: (716) 823 - 8188

Email: David.hojnacki@erie.gov

To report illicit discharges in the ECSD #6 contact:

Name: DSM

Phone: (716) 823 - 8188

Email: DSM@erie.gov

To report stormwater complaints related to construction activity in the ECSD #6 contact:

Name: Scott Hayes

Title: Code Enforcement Officer - Lackawanna

Phone: (716) 827 - 6403

Email: shayes@lackny.org

Note: Both the City of Lackawanna and Erie County Sewer District No. 6 have the same geographical boundaries. There are six minimum control measures designed to reduce the discharge of pollutants to the maximum extent practicable. The City of Lackawanna is responsible for all six (6) MCMs while Erie County Sewer District No. 6 is responsible for MCMs 1,2,3 & 6. ECSD 6 assists the city in reviewing and accepting the SWPPP for MCM 4, construction site run-off control. A memo of understanding is in place.

Alternative Implementation Agreements

Inventory of Other Entities Assisting with Implementation of SWMP Plan

Entities assisting with portions of the SWMP development, implementation, or enforcement.

Name of Entity	Permit Requirement
WNY Stormwater Coalition	MCM 1 & 2
City of Lackawanna	MCM 4 &5

In this SWMP additional requirements to ECSD No. 6 have been added as mini system No. 2 is tributary to the impaired South Branch Smokes Creek.

Alternative Implementation Agreements and/or Memorandum of Understandings are available by contacting the Stormwater Management listed Officer.

SPDES General Permit for Stormwater Discharges from Municipal Separate Storm Sewer Systems (MS4s) Permit No. GP-0-24-001

This SWMP has been prepared in accordance with Part VII. Minimum Control Measures (MCMs) for Traditional Non-Land Use Control & Non-Traditional MS4 Operators

The SWMP is available to the public and is located at <https://www3.erie.gov/dsm/education-center>

ECSD No. 6 consider their **public** to be:

- Employees (i.e., staff, faculty);
- User population/visitors;
- Students;
- Tenants; and
- Contractors & developers working for ECSD No. 6.

A. MCM1 – Public Education and Outreach Program

ECSD No. 6 must develop and implement an education and outreach program to increase public awareness of pollutant generating activities and behaviors. This MCM is designed to inform the public about the impacts of stormwater on water quality, the general sources of stormwater pollutants, and the steps the public can take to reduce pollutants in stormwater runoff.

1. Development

Within three (3) years

a. Focus Areas

i. Surface waters classified as Class A-S, A or B

Listed below are surface waters classified as Class A-S, A or B according to New York State's Part 701 Classifications--Surface Waters and Groundwaters. Areas discharging to these waters are focus areas for the education and outreach program. Because the Class A-S, Class A and Class B surface waters have nearly identical best uses, and because all MS4 Operators in Erie and Niagara Counties are within the watershed of a Class A-S, Class A surface water (i.e. Lake Erie, Niagara River or Lake Ontario), the focus area for education and outreach will encompass the entire geographical area of GP-0-24-001 regulated MS4s as depicted in **Appendix A**. All education and outreach materials will approach water quality protection from the high standards inherent in Class A-S, A and B surface waters.

Class A-S and Class A fresh surface waters are a source of water supply for drinking, culinary or food processing purposes; primary and secondary contact recreation; and fishing. The waters are suitable for fish, shellfish and wildlife propagation and survival.

- Lake Erie Class A-S
- Niagara River Class A-S
- Lake Ontario Class A
- Eighteen Mile Creek, Middle, and trib (0104-0017): Class A
- Eighteenmile Creek, Upper, and trib (0104-0039): Class A
- Buffalo Creek, Lower, and trib (0103-0004): Class A
- Buffalo Creek, Upper, and minor trib (0103-0003): Class A

Class B fresh surface waters are primary and secondary contact recreation and fishing. These waters are suitable for fish, shellfish and wildlife propagation and survival.

- Cayuga Creek, Middle, and minor trib (0103-0017): Class B
- Eighteenmile Creek, Lower, minor trib (0104-0030): Class B
- S. Branch Eighteenmile, Lower, and trib (0104-0016): Class B
- Scajaquada Creek, Upper, and trib (0101-0034): Class B
- Ellicott Creek, Lower, and trib (0102-0018): Class B
- Grand Island, all trib to Niagara R (0101-0011): Class B
- Hampton Brook and Tribs (0104-0041): Class B
- Hyde Park Lake (0101-0030): Class B
- Tonawanda Creek, Middle, Main Stem (0101-0006): Class B

ii. Sewersheds for impaired waters

The surface water listed below are identified as impaired in the New York State 2018 Section 303(d) **List of Impaired/TMDL Waters and included in Appendix C of the MS4 General Permit (GP-0-24-001)**. The sewersheds discharging to the impaired waters is the focus area for the education and outreach program in ECSD #6.

Erie County

- South Branch Smoke Cr, Lower, and trib (0101-0036)***
 - Phosphorus
 - Silt/Sediment

***Applicable to ECSD #6

iii. TMDL watersheds:

N/A: there are no TMDL watersheds in Erie County or Niagara County.

iv. Areas with construction activities:

N/A: MCM 4 is administered by the City of Lackawanna. However, ECSD #6 does assist the City of Lackawanna in reviewing and accepting the SWPPP for construction projects.

v. Areas with on-site wastewater systems:

N/A: ECSD #6 does not have any parcels serviced by an on-site wastewater system.

vi. Residential, commercial, and industrial areas

Education will take a variety of forms for these audiences. Residential/household education will include tabling at community and regional events, stormwater displays in the main municipal building, school-based programming such as the annual rain barrel painting contest, and classroom presentations. Commercial audiences will be targeted for education on topics most relevant to their primary operation (i.e. restaurants, landscaping and lawn care, mobile washers); industrial areas will be targeted for education on outdoor materials storage and other issues as they are discovered. Institutional and open space facilities will be educated of proper discharge of waste such as not using a storm sewer drainage inlet as a trash can.

vii. Stormwater hotspots

Stormwater hotspots targeted for education: commercial container nurseries, vehicle fueling stations, and vehicle service and maintenance facilities.

viii. Areas with illicit discharges

Education will be targeted to specific sewersheds that are identified during illicit discharge detection monitoring as discharging stormwater pollutants, specifically related to discharges from activities such as landscaping and lawn care, dog waste; household hazardous waste disposal, vehicle washing.

b. Target Audiences and Associated Pollutant Generating Activities

Within three (3) years

- i. Residents:** landscaping and lawn care; dog waste; household hazardous waste disposal; vehicle washing.
- ii. Commercial:** Business owners and staff: landscaping and lawn care; vehicle fueling; vehicle service and maintenance; uncovered materials exposure/storage.
- iii. Institutions:** Managers, staff, and students: uncovered materials exposure/storage (institutions not subject to SPDES MS4 Stormwater Permit).
- iv. Construction:** Developers, contractors, and design professionals: soil disturbance (erosion and sediment control); uncontained construction waste
- v. Industrial:** Owners and staff: uncovered materials exposure/storage (industry not subject to SPDES MSGP Stormwater Permit)
- vi. MS4 Operator's municipal staff:** uncovered materials exposure; preventative maintenance; spill prevention and response; erosion and sediment controls; managing vegetated areas and open space; salt storage; waste, garbage and floatable debris.

c. Education and Outreach Topics

Within three (3) years

Listed below are the education and outreach topics, target audience(s), and how the education and outreach topics reduce the potential for pollutants to be generated by the target audience(s) for the focus area(s).

Topic	Target Audience	How Topic Reduces Potential for Pollutants to be Generated by Target Audience(s)
Household Guide	Residents	Addresses common household activities that contaminate stormwater and how to prevent
Rain Garden How-To-Guide	Residents	Reduces stormwater runoff and potential to carry pollutants to the MS4
Pet Waste	Residents, MS4 staff	Addresses the importance of cleaning up and proper disposal of pet waste to ensure pathogens are not exposed to runoff

Illicit Discharge Citizen's Guide	Residents, MS4 staff	Provides information on storm sewers, illicit discharges, how to recognize them and where to report the incident
Stormwater Ponds	Residents, MS4 staff, Commercial sites, HOAs	Provides information on stormwater ponds, their purpose and maintenance.
DIY Rain Barrel & Home Composting	Residents	Reduces stormwater runoff, use of lawn care chemicals and potential to carry pollutants to the MS4
Rain Barrel Use/Installation	Residents	Reduces stormwater runoff and potential to carry pollutants to the MS4
Litter in Waterways	Residents, MS4 staff	Addresses how litter pollutes and impacts local waterways
Moving Dirt/Soil Disturbance/Construction General Permit	Contractors, developers, MS4 staff	Addresses soil disturbance, the CGP, and importance of erosion and sediment control

d. Illicit Discharge Education

Within six (6) months. DONE!

The brochure entitled: *Illicit Discharge Detection and Elimination: A Citizen's Guide to Identifying and Preventing Stormwater Pollution* will be made available to the public as follows:

- a. Municipal employees: email announcement
- b. Businesses: municipal web page; public library
- c. Public: municipal web page; public library

2. Implementation and Frequency

a. Distribution Method of Educational Messages

A variety of the following methods of distribution will be utilized:

- Printed materials (e.g., mail inserts, brochures, and newsletters);
- Electronic materials (e.g., websites, email listservs);
- Mass media (e.g., newspapers, public service announcements on radio or cable);
- Workshops or focus groups;
- Displays in public areas (e.g., town halls, library, parks); or
- Social Media (e.g., Facebook, Twitter, blogs).

b. Frequency

Once every 5 years, ECSD No. 6 directs an educational message to each target audience(s) for each focus area(s) based on the defined education and outreach topic(s) listed in this Stormwater Management Program Plan; and, documents the date of completion and method of distribution for each message.

In addition, twice a year ECSD No. 6 will provide educational messages to the public residing in the storm sewer shed of mini system no. 2 tributary to the impaired waters of South Branch-Smokes Creek.

Compliance documentation is listed in Appendix B.

c. Updates to the Public Education and Outreach Program

Annually, by April 1: ECSD No. 6 reviews and updates, if necessary, the focus areas, target audiences, and/or education and outreach topics.

Compliance documentation is listed in Appendix B.

B. MCM 2 - Public Involvement/Participation

ECD No. 6 must provide opportunities to involve the public in the development, review, and implementation of the SWMP. This MCM is designed to give the public the opportunity to include their opinions in the implementation of this SPDES general permit.

1. Public Involvement/Participation

Public involvement/participation in the development and implementation of ECSD #6 SWMP includes opportunities to: review the SWMP Plan; submit comments; ask questions; and, become involved in the SWMP.

Such opportunity will be provided via the following avenues of communication:

- Public hearings or meetings.
- Reporting concerns about activities or behaviors observed.
- Stewardship activities.

Methods of distribution used to inform public of opportunity:

- Printed materials (e.g., mail inserts, brochures, and newsletters);
- Electronic materials (e.g., websites, email listservs);
- Mass media (e.g., newspapers, public service announcements on radio or cable);
- Workshops or focus groups;
- Displays in public areas (e.g., town halls, library, parks); or
- Social Media (e.g., Facebook, Twitter, blogs).

Compliance documentation is listed in Appendix B.

a. Local point of contacts to receive and respond to public concerns regarding stormwater management and compliance with permit requirements:

1. Name: Ben Noonan

Title: Asst. Sanitary Engineer

Phone: (716) 858 - 6974

Email: Benjamin.noonan@erie.gov

2. Name: David Hojnacki

Title: Sewer District Manager

Phone: (716) 823 - 8188

Email: David.hojnacki@erie.gov

The name or title of those individuals, with contact information, will be published on public outreach and public participation materials.

2. Public Notice and Input Requirements

a. Public Notice and Input Requirements for SWMP Plan

This requirement is included above in **B.1 Public Involvement/Participation**

b. Public Notice and Input Requirements for Draft Annual Report

Annually, ECSD No. 6 provides opportunity for the public to review and comment on the draft Annual Report.

Document the opportunity below.

- a) For public review and comment, the draft Annual Report will be posted on the Division of Sewerage Management (DSM) website: www.erie.gov/dsm. The draft report will have a cover notice that includes information on the timeframes and procedures to submit comments, at minimum one month before the final report is due (April 1 of each year).

Compliance documentation is listed in Appendix B.

c. Consideration of Public Input

Annually by March 1, ECSD #6 documents a summary of comments received on the SWMP Plan and draft Annual Report.

Compliance documentation is listed in Appendix B.

C. MCM 3 - Illicit Discharge Detection and Elimination

The ECSD #6 has a program to systematically detect illicit discharges to its municipal separate storm sewer system (MS4), track down the source of the illicit discharge, and eliminate it. This program is designed to manage the MS4 so it is not conveying pollutants associated with flows other than those directly attributable to stormwater runoff. The ECSD #6 Illicit Discharge Detection and Elimination Program is supported by Local law [Microsoft Word - 2007 Storm Sewer Rules and Regs MS4 .doc \(erie.gov\)](#), See **ARTICLE VI, POLLUTION CONTROL** Section 6.01 prohibition of Illicit Discharges and **ARTICLE IX, ENFORCEMENT**.

1. Illicit Discharge Detection

a. Public Reporting of Illicit Discharges

To report illicit discharges in the ECSD #6:

Call (716) 823-8188
or
Email DSM@ERIE.GOV

If reported by email, please provide:

- a) Date of the report;
- b) Location of the *illicit discharge*;
- c) Nature of the *illicit discharge*

Within thirty (30) days, each report will be documented in ECSD No. 6 SWMP.

Compliance documentation is listed in Appendix B.

b. Monitoring Locations

The three types of monitoring locations used to detect illicit discharges are identified as follows:

i. **MS4 outfalls:** Any point of stormwater discharge from pipes to surface waters of New York State from ECSD No. 6 MS4.

ii. **Interconnections:** Any point of stormwater discharge from pipes to another MS4 or private storm sewer system.

iii. **intraconnections:** This type is **not applicable** to ECSD #6 as the only ECSD #6 facility is the water resource recovery facility located at 260 Lehigh Ave and it is authorized to discharge stormwater by the **Multi-Sector General Permit (MSGP), ID NYR00A950.**

c. Monitoring Locations Inventory

The ECSD #6 maintains an inventory of monitoring locations that are within the boundaries of its MS4 Regulated area. The inventory is available for public review and comment as follows:

- **Appendix A**, mini systems 1 through 5
- Upon request: contact Stormwater Management Officer
- At the **ECSD #6** municipal building as follows:
 - Hardcopy: (Department)
 - Electronically:
 - Public: Upon Request
 - Internally: ([DSM Geocortex Viewer for HTML5 2.11.2 \(erie.gov\)](#))

For each monitoring location, the following information is included:

a) Inventory information for MS4 outfalls

- ID;
- Prioritization (high or low);
- Type of monitoring location;
- Receiving waterbody name and class;
- Receiving waterbody WI/PWL Segment ID;
- Land use in drainage area;
- Type of conveyance (closed pipe);
- Material;
- Shape (circular);
- Dimensions;
- Submerged in water;
- Submerged in sediment.

b) Inventory information for interconnections

- ID;
- Prioritization (high or low);
- Type of monitoring location;
- Name of MS4 Operator's municipal facility, if located at a municipal facility;
- Receiving waterbody name and class.

c) Inventory information for municipal facility intraconnections

- N/A

ii. Annually, the ECSD #6 updates the inventory if monitoring locations are constructed or discovered; or if information for existing monitoring locations changes. Prioritization determinations, as noted below, are also addressed in the update.

Compliance documentation pertaining to updating the monitoring locations inventory will be listed in **Appendix B**.

a. Monitoring Locations Prioritization

Within 3 years

i. The ECSD #6 prioritizes its monitoring locations which are included in the monitoring locations inventory as follows:

a) High priority monitoring locations are as follows:

- At a high priority municipal facility, defined as a municipal facility that has one or more of the following on site and exposed to stormwater:
 - Storage of chemicals, salt, petroleum, pesticides, fertilizers, antifreeze, lead-acid batteries, tires, waste/debris;
 - Fueling stations; and/or
 - Vehicle or equipment maintenance/repair.
- **Discharging to impaired waters;**
- Directly discharging to waters with Class AA-S, A-S, AA, A, B, SA, or SB; and/or
- Confirmed citizen complaints on three or more separate occasions in the last twelve (12) months.

b) All other monitoring locations are considered low priority.

ii. Monitoring locations that are newly constructed, or discovered, will be prioritized within 30 days; and

iii. Annually, the ECSD #6 updates the monitoring location prioritization in the inventory based on information gathered as part of the monitoring location inspection and sampling program.

Compliance documentation pertaining to updating prioritization for monitoring locations in the inventory is listed in **Appendix B**. The inventory is available for public review and comment as indicated above.

e. Monitoring Locations Inspection and Sampling Program

The ECSD #6 has a program to inspect monitoring locations and sample dry weather flow discharging from the MS4.

i. The monitoring locations inspection and sampling procedures are as follows:

a) During dry weather, each outfall will be inspected, at minimum, once every five (5) years; 20% of the outfalls will be inspected each year.

b) Inspections and sampling results (if flowing during dry weather) are documented with a Monitoring Locations Inspection and Sampling Field Sheet (**Appendix C**). Although not included as an appendix, all completed forms for inspection and sampling are considered part of this SWMP Plan and are available for public review and comment as follows:

- Upon request: contact Stormwater Program Coordinator
- At the ECSD #6 municipal building as follows:
 - Hardcopy: (Department)
 - Electronically:
 - Public: Upon Request
 - Internally: ([DSM Geocortex Viewer for HTML5 2.11.2 \(erie.gov\)](#))

c) Following a monitoring location inspection, all inspections which resulted in a “suspect” or “obvious” illicit discharge characterization are subject to sampling unless the source of the illicit

discharge is clear and discernable (e.g., sewage), in which case sampling is not necessary;

d) Sampling is conducted using field test strips and/or field instrumentation that are sufficiently sensitive to detect the parameter below the sampling action level used. Analytical methods are not subject to New York State's 40 CFR Part 136 requirements for approved methods and certified laboratories;

e) Source track down is initiated for monitoring locations that are characterized as "suspect" or "obvious" illicit discharge, or that exceed any sampling action level used;

f) All monitoring locations are re-inspected within thirty (30) days of the initial inspection, if there is a physical indicator not related to flow, that is indicative of an intermittent or transitory discharges. In layman's terms, a monitoring location may not be flowing at the time of the dry weather inspection, but there may be evidence (i.e. physical indicators) of an illicit discharge such as oil stains or toilet paper. If those same physical indicators persist, the ECSD #6 will initiate illicit discharge track down procedures.

ii. The ECSD #6, in partnership with the **Western NY Stormwater Coalition**, has an employee training program addressing Illicit Discharge Detection and Elimination procedures. This training engages employees in a classroom setting as well as in hands-on monitoring location Inspection, sampling, results interpretation, and source track down and elimination.

a) **All new staff** that are charged with performing monitoring location inspections and sampling procedures **will receive training** on procedures prior to doing so;

b) **All existing staff**, that are charged with performing monitoring location inspections and sampling procedures **will receive training** on procedures prior to doing so, and, once every five (5) years, thereafter; and

c) If the monitoring locations inspection and sampling procedures are updated, all staff will receive training on the updates prior to conducting monitoring locations inspections and sampling.

iii. The names, titles, and contact information for the individuals who have received monitoring locations inspection and sampling procedures training is updated annually;

iv. Annually, by April 1, the ECSD #6 reviews and updates its monitoring location inspection and sampling procedures based on results (e.g., trends, patterns, areas with illicit discharges, and common problems);

Compliance documentation is listed in **Appendix B** for:

- Staff that have received monitoring location inspection and sampling procedures training; and,
- Updates to the monitoring location inspection and sampling procedures.

2. Illicit Discharge Track Down Program

Within two (2) years (Being finalized)

The ECSD #6 has an illicit discharge track down program to identify the source of illicit discharges and the responsible party.

a. The illicit discharge track down program includes the following:

i. & ii. The illicit discharge track down program is part of the Illicit Discharge Detection and Elimination Program detailed in **Appendix D**. It includes procedures and steps to take for illicit discharge track down;

The program will be in accordance of chapter 13 of Illicit Discharge Detection and Elimination; A Guidance Manual for Program Development and Technical Assessments, 2004ed.

iii. Timeframes to initiate illicit discharge track down are as follows:

- a) Within twenty-four (24) hours of discovery, the ECSD #6 will initiate track down procedures for flowing MS4 monitoring locations with obvious illicit discharges;
- b) Within two (2) hours of discovery, the ECSD #6 will initiate track down procedures for obvious illicit discharges of sanitary wastewater that would affect bathing areas during bathing season, shell fishing areas or public water intakes and report orally or electronically to the NYSDEC Regional Water Engineer and local health department; and
- c) Within five (5) days of discovery, the ECSD #6 will initiate track down procedures for suspect illicit discharges.

b. ECSD #6, in partnership with the Western NY Stormwater Coalition, has an employee training program addressing Illicit Discharge and Elimination procedures. This training includes source track down. Requirements pertaining to employee training for existing staff, new staff and updates to the illicit discharge source track down procedures are identical.

c. The names, titles, and contact information for the individuals who have received illicit discharge track down procedures training is updated annually; and

d. Annually, by April 1, the ECSD #6 reviews and updates its illicit discharge track down procedures.

Compliance documentation is listed in **Appendix B** for:

- Staff that have received illicit discharge track down procedures training; and,
- Updates to the illicit discharge track down procedures.

3. Illicit Discharge Elimination Program

Within two (2) years (Being finalized)

The ECSD #6 has an illicit discharge elimination program. Once an illicit discharge is tracked down and a source identified, steps are taken to eliminate the source/discharge. As noted previously, the ECSD #6 Illicit Discharge Detection and Elimination Program is supported by Local law [Microsoft Word - 2007 Storm Sewer Rules and Regs MS4 .doc \(erie.gov\)](#)

a. The illicit discharge elimination procedures including:

- i. Provisions for escalating enforcement and tracking enforcement actions are in the ECSD No. 6 Enforcement Response Plan detailed in **Appendix O**;
- ii. To confirm the corrective actions have been taken, the monitoring location will be inspected, and sampled if flowing, within 30 days of receiving notice that the source of contamination has been eliminated;
- iii. Steps taken for illicit discharge elimination procedures;

iv. Timeframes for illicit discharge elimination are as follows:

- Within twenty-four (24) hours of identification of an illicit discharge that has a reasonable likelihood of adversely affecting human health or the environment, the ECSD #6 will eliminate the illicit discharge;
- Within five (5) days of identification of an illicit discharge that does not

- have a reasonable likelihood of adversely affecting human health or the environment, the ECSD #6 will eliminate the illicit discharge; and
- Where elimination of an illicit discharge within the specified timeframes above is not possible, the ECSD #6 will notify the NYSDEC Regional Water Engineer.

b. ECSD #6, in partnership with the Western NY Stormwater Coalition, has an employee training program addressing Illicit Discharge Detection and Elimination procedures. This training includes illicit discharge elimination procedures. General requirements pertaining to employee training for existing staff, new staff and updates to the illicit discharge elimination are identical.

c. The names, titles, and contact information for the individuals who have received illicit discharge elimination procedures training is updated annually;

d. Annually, by April 1, the ECSD #6 reviews and updates the illicit discharge elimination procedures.

Compliance documentation is listed in **Appendix B** for:

- Staff that have received illicit discharge elimination procedures training; and,
- Updates to the illicit discharge elimination procedures.

D. MCM 4 – Construction Site Stormwater Runoff Control

As a traditional non-land use control operator, this MCM is not applicable to ECSD #6.

The boundaries of ECSD #6 and the city of Lackawanna are identical. A memo of Understandings/Agreement is executed.

1. Applicable Construction Activities/Projects/Sites

a. The construction site stormwater runoff control program addresses stormwater runoff to the MS4 from sites with construction activities that:

- Result in a total land disturbance of greater than or equal to one acre; or
- Disturb less than one acre if part of a larger common plan of development or sale.

b. For construction activities where the city of Lackawanna is listed as the owner/operator on the Notice of Intent for the construction GP, the ECSD #6/DSM reviews the storm sewer plans, the sediment and erosion plans, and the SWPPP for the project and when acceptable and approvable, the SMO of ECSD #6 co-signs the NOI certification for the project.

2. SWPPP Review

a. Individuals responsible for reviewing SWPPPs for acceptance will complete four (4) hours of NYSDEC endorsed training in proper erosion and sediment control principles by attending the NYSDEC 4-Hour Erosion and Sediment Control Training.

Compliance documentation will be listed in **Appendix B**

E. MCM 5 – Post-Construction Stormwater Management

Not applicable to ECSD #6. This MCM is the responsibility of the City of Lackawanna. A memo of Understandings/Agreement is executed.

F. MCM 6 – Pollution Prevention and Good Housekeeping

The ECSD #6 has a pollution prevention and good housekeeping program for its municipal facilities and municipal operations to minimize pollutant discharges. This MCM is designed to ensure the ECSD #6 own activities do not contribute pollutants to surface waters of the State.

1. Best Management Practices (BMPs) for Municipal Facilities & Operations

Within three (3) years

The ECSD #6 has a municipal facility program and municipal operations program with best management practices (BMPs) that will minimize the discharge of pollutants associated with municipal facilities and municipal operations, respectively. The BMPs to be considered are as follows and are documented in this SWMP Plan:

a. Minimize Exposure (N/A)

- i. Exposure of materials to rain, snow, snowmelt, and runoff must be minimized, unless not technologically possible or not economically practicable and achievable in light of best industry practices, including areas used for loading and unloading, storage, disposal, cleaning, maintenance, and fueling operations, with the following BMPs:
 - a) Locate materials and activities inside or protect them with storm resistant coverings;
 - b) Use grading, berthing, or curbing to prevent runoff of contaminated flows and divert run-on away from these areas;
 - c) Locate materials, equipment, and activities so leaks and spills are contained in existing containment and diversion systems;
 - d) Clean up spills and leaks promptly using dry methods (e.g., absorbents) to prevent the discharge of pollutants;
 - e) Store leaky vehicles and equipment indoors or, if stored outdoors, use drip pans and absorbents;
 - f) Use spill/overflow protection equipment;
 - g) Perform all vehicle and/or equipment cleaning operations indoors, under cover, or in bermed areas that prevent runoff and run-on and also captures any overspray;
 - h) Drain fluids, indoors or under cover, from equipment and vehicles that will be decommissioned, and, for any equipment and vehicles that will remain unused for extended periods of time, inspect at least monthly for leaks; and/or
 - i) Minimize exposure of chemicals by replacing them with a less toxic alternative (e.g., use non-hazardous cleaners).

ii. No Exposure Certification for High Priority Municipal Facilities (N/A)

- a) Municipal facilities may qualify for No Exposure Certification (**Appendix H**) when all activities and materials are completely sheltered from exposure to rain, snow, snowmelt and/or runoff.
- b) High priority municipal facilities with uncovered parking areas for vehicles awaiting maintenance may be considered a low priority municipal facility if only routine maintenance is

performed inside and all other no exposure criteria are met. Details on high/low priority municipal facilities are addressed later in this section.

- c) Municipal facilities accepting or repairing disabled vehicles and/or vehicles that have been involved in accidents are not eligible for the No Exposure Certification.
- d) Municipal facilities must maintain the No Exposure Certification and document in the SWMP Plan. The No Exposure Certification ceases to apply when activities or materials become exposed.

b. Follow a Preventive Maintenance Program

- i. The ECSD #6 has a preventative maintenance program that includes routine inspection, testing, maintenance, and repair of all fueling areas, vehicles and equipment and systems to prevent leaks, spills and other releases.

This includes:

- a) Performing inspections and preventive maintenance of stormwater drainage, source controls, treatment systems, and plant equipment and systems;
 - b) Maintaining non-structural BMPs (e.g., keep spill response supplies available, personnel appropriately trained, containment measures, covering fuel areas); and
 - c) Ensuring vehicle wash water is not discharged to the MS4 or to surface waters of the State. Washing equipment/vehicles in a designated and/or covered area where wash water is collected to be recycled or discharged to the sanitary sewer is required.
- ii. Routine maintenance is performed to ensure BMPs are operating properly.
- iii. When a BMP is not functioning to its designed effectiveness and needs repair or replacement:
 - a) Maintenance is performed before the next anticipated storm event, or as necessary to maintain the continued effectiveness of stormwater controls. If maintenance prior to the next anticipated storm event is impracticable, maintenance must be scheduled and accomplished as soon as practicable; and
 - b) Interim measures are taken to prevent or minimize the discharge of pollutants until the final repair or replacement is implemented, including cleaning up any contaminated surfaces so that the material will not be discharged during subsequent storm events.

c. Spill Prevention and Response Procedures

- i. The ECSD #6 follows Spill Prevention and Response Procedures designed to minimize the potential for leaks, spills and other releases that may be exposed to stormwater and provide for effective response to such spills if or when they occur. The Spill Prevention and Response Procedures are as follows:

- a) Store materials in appropriate containers.
 - b) Label containers (e.g., "Used Oil," "Spent Solvents," "Fertilizers and Pesticides") that could be susceptible to spillage or leakage to encourage proper handling and facilitate rapid response if spills or leaks occur.
 - c) Implement procedures for material storage and handling, including the use of secondary containment and barriers between material storage and traffic areas, or a similarly effective means designed to prevent the discharge of pollutants from these areas;

- d) Develop procedures for stopping, containing, and cleaning up leaks, spills, and other releases. As appropriate, execute such procedures as soon as possible;
- e) Keep spill kits on-site, located near areas where spills may occur or where a rapid response can be made;
- f) Develop procedures for notification of the appropriate facility personnel, emergency response agencies, and regulatory agencies when a leak, spill, or other release occurs. If possible, one of these individuals should be a member of the stormwater pollution prevention team. Any spills must be reported in accordance with 6 NYCRR 750-2.7; and
- g) Following any spill or release, the MS4 Operator must evaluate the adequacy of the BMPs identified in the municipal facility specific SWPPP. If the BMPs are inadequate, the SWPPP must be updated to identify new BMPs that will prevent reoccurrence and improve the emergency response to such releases.

ii. Measures for cleaning up spills or leaks must be consistent with applicable petroleum bulk storage, chemical bulk storage, or hazardous waste management regulations at 6 NYCRR Parts 596-599, 613 and 370-373.

iii. This SPDES general permit does not relieve ECSD #6 of any reporting or other requirements related to spills or other releases of petroleum or hazardous substances. Any spill of a hazardous substance must be reported in accordance with 6 NYCRR 597.4. Any spill of petroleum must be reported in accordance with 6 NYCRR 613.6 or 17 NYCRR 32.3.

d. Erosion and Sediment Controls (N/A)

- i. Stabilize exposed areas and control runoff using structural and/or nonstructural controls to minimize onsite erosion and sedimentation.
- ii. The operator must consider:
 - a) Structural and/or non-structural controls found in the NYS E&SC 2016;
 - b) Areas that, due to topography, land disturbance (e.g., construction), or other factors, have potential for significant soil erosion;
 - c) Whether structural, vegetative, and/or stabilization BMPs are needed to limit erosion;
 - d) Whether velocity dissipation devices (or equivalent measures) are needed at discharge locations and along the length of any channel to provide a non-erosive flow velocity from the structure to a water course; and
 - e) Address erosion or areas with poor vegetative cover, especially if the erosion is within fifty (50) feet of surface water of the State.

e. Manage Vegetated Areas and Open Space on Municipal Property

- i. Maintain vegetated areas only on ECSD #6 owned/operated property and right of ways:
 - a) Specify proper use, storage, and disposal of pesticides, herbicides, and fertilizers including minimizing the use of these products and using only in accordance manufacturer's instruction;
 - b) Use lawn maintenance and landscaping practices that are protective of water quality. Protective practices include reduced mowing frequencies; proper disposal of lawn clippings; and

- use of alternative landscaping materials (e.g., drought resistant planting);
- c) Place pet waste disposal containers and signage concerning the proper collection and disposal of pet waste at all parks and open space where pets are permitted; and
- d) Address waterfowl congregation areas where needed to reduce waterfowl droppings from entering the MS4.

f. Salt Storage Piles or Pile Containing Salt (N/A)

Enclose or cover storage piles of salt, or piles containing salt, used for deicing or maintenance of paved surfaces, except during loading, unloading, and handling. Implement appropriate measures (e.g., good housekeeping, routine sweeping, diversions, containment) to minimize exposure resulting from adding to or removing materials from the pile.

g. Waste, Garbage, and Floatable Debris (N/A)

- i. Keep all dumpster lids closed when not in use. For dumpsters and roll off boxes that do not have lids and could leak, ensure that discharges have a control (e.g., secondary containment, treatment); and
- ii. Keep exposed areas free of waste, garbage, and debris or intercept them before they are discharged:
 - a) Manage trash containers at parks and open space (scheduled cleanings; sufficient number);
 - b) Pick up trash and debris on ECSD #6 owned/operated property and rights of way; and
 - c) Clean out catch basins within the appropriate timeframes as noted later in this section.

h. Alternative Implementation Options

When alternative implementation options are utilized, require the parties performing municipal operations as contracted services, including but not limited to street sweeping, snow removal, and lawn/grounds care, to meet permit requirements as the requirements apply to the activity performed.

2. Municipal Facilities

a. Municipal Facility Program

Within three (3) years

The ECSD #6 has a municipal facility program that includes BMPs to minimize stormwater pollution from municipal operations, differentiation of BMPs applicable to high or low priority facilities, and employee training. The municipal facility program is documented in the SWMP Plan specifying:

- i. The municipal facility procedures include:
 - a) All BMPs incorporated into the municipal facility program.
 - b) High priority municipal facility requirements, that are specific to municipal operations occurring at each high priority facility; and
 - c) Low priority municipal facility requirements that are specific to municipal operations occurring at each low priority facility.
- ii. The ECSD #6 in partnership with the **Western NY Stormwater Coalition, has an employee training program** addressing its municipal facility procedures. This training addresses on-site facility operations and is conducted concurrently with municipal operations procedures.
 - a) All new staff that are charged with conducting municipal facility procedures/BMPs will receive training on procedures prior to doing so;

- b) All existing staff, that are charged with conducting any municipal facility procedures/BMPs will receive training on procedures prior to doing so, and, once every five (5) years, thereafter; and
- c) If the municipal facility procedures/BMPs are updated, all staff will receive training on the updates prior to conducting municipal facility procedures.

iii. The names, titles, and contact information for the individuals who have received municipal facility procedures training are updated annually;

iv. Annually, by April 1, the ECSD #6 reviews and updates its municipal facility procedures.

Compliance documentations are listed in the **SWPPP of the Lackawanna WRRF's covered under the Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activities.**

b. Municipal Facility Inventory

Within two (2) years (Being finalized)

- i. The ECSD #6 maintains an inventory of all municipal facilities (Plants and pumping stations) in the SWMP Plan. The following information is included in the inventory:
 - a) Name of municipal facility;
 - b) Street address;
 - c) Type of municipal facility;
 - d) Prioritization (high or low);
 - e) Receiving waterbody name and class;
 - f) Receiving waterbody WI/PWL Segment ID;
 - g) Contact information;
 - h) Responsible department;
 - i) Location of SWPPP (if high priority; when completed);
 - j) Type of activities present on site.
 - k) Size of facility (acres);
 - l) Date of last assessment.
 - m) BMPs identified; and
 - n) Projected date of next comprehensive site assessment as per the municipal facility prioritization.
- ii. Annually, the ECSD #6 updates the inventory if new municipal facilities are added.

c. Municipal Facility Prioritization

Within three (3) years

i. The ECSD #6 prioritizes all known municipal facilities as follows:

a) High priority municipal facilities include municipal facilities that have one or more of the following on site and exposed to stormwater:

- i) Storage of chemicals, salt, petroleum, pesticides, fertilizers, antifreeze, lead-acid batteries, tires, waste/debris;
- ii) Fueling stations; and/or
- iii) Vehicle or equipment maintenance/repair.

b) Low priority municipal facilities include any municipal facilities that do not meet the criteria for a high priority municipal facility.

c) High priority municipal facilities which qualify for a No Exposure Certification (Appendix H) are low priority municipal facilities.

ii. New or addition to municipal facility are added to the inventory, the ECSD #6 prioritizes them; and

iii. Annually, after the initial prioritization, the ECSD #6 will update the municipal facility prioritization in the inventory based on information gathered as part of the municipal facility program, including cases where a No Exposure Certification ceases to apply. Although not included as an appendix, the inventory and all required updates is considered part of the ECSD #6 SWMP Plan. The inventory is available for public review and comment as follows:

- Upon request: contact Stormwater Program Coordinator
- At the ECSD #6 municipal building as follows:
 - Hardcopy: (Department)
 - Electronically:
- Public: Upon Request
- Internally: ([DSM Geocortex Viewer for HTML5 2.11.2 \(erie.gov\)](#))

d. High Priority Municipal Facility Requirements

i. Municipal Facility Specific SWPPP

Within five (5) years

ECSD #6 has a municipal facility specific SWPPP for each high priority municipal facility. A copy of the municipal facility specific SWPPP is retained on site at the respective municipal facility. **The ECSD #6 SWPPP is in compliance with the Multi-Sector SPDES Permit and contains the following:**

a) Stormwater Pollution Prevention Team

The municipal facility specific SWPPP must identify the individuals (by name and/or title) and their role/responsibilities in developing, implementing, maintaining, and revising the municipal facility specific SWPPP. The activities and responsibilities of the team must address all aspects of the municipal facility specific SWPPP.

b) General Site Description

A written description of the nature of the activities occurring at the municipal facility with a potential to discharge pollutants, type of pollutants expected, and location of key features as detailed in the site map.

c) Summary of potential pollutant sources

The municipal facility specific SWPPP must identify each area at the municipal facility where materials or activities are exposed to stormwater or from which authorized non-stormwater discharges originate,

including any potential pollutant sources for which the municipal facility has reporting requirements under the Emergency Planning and Community Right-To-Know Act (EPCRA), Section 313.

- i) Materials or activities include machinery; raw materials; intermediate products; byproducts; final products or waste products; and, material handling activities which includes storage, loading and unloading, transportation or conveyance of any raw material, intermediate product, final product or waste product.
- ii) For each separate area identified, the description must include:
 - Activities - A list of the activities occurring in the area (e.g., material storage, equipment fueling and cleaning);
 - Pollutants - A list of the associated pollutant(s) for each activity. The pollutant(s) list must include all materials that are exposed to stormwater; and
 - Potential for presence in stormwater - For each area of the municipal facility that generates stormwater discharges, a prediction of the direction of flow, and the likelihood of the activity to contaminate the stormwater discharge. Factors to consider include the toxicity of chemicals, quantity of chemicals used, produced or discharged, the likelihood of contact with stormwater, and history of leaks or spills of toxic or hazardous pollutants.

d) Spills and Releases

For areas that are exposed to precipitation or that otherwise drain to a stormwater conveyance to be covered under this SPDES general permit, the municipal facility specific SWPPP must include a list of spills or releases of petroleum and hazardous substances or other pollutants, including unauthorized non-stormwater discharges, that

may adversely affect water quality that occurred during the last three-year period. The list must be updated when spills or releases occur.

e) Site Map

The municipal facility specific SWPPP must include a site map identifying the following, as applicable:

- i) Property boundaries and size in acres;
- ii) Location and extent of significant structures (including materials shelters), and impervious surfaces;
- iii) Monitoring locations with its approximate sewershed. Each monitoring location must be labeled with the monitoring location identification;
- iv) Location of all post-construction SMPs and MS4 infrastructure (i.e. storm sewer system);
- v) Locations of discharges authorized under other SPDES permits;
- vi) Locations where potential spills or releases can contribute to pollutants in stormwater discharges and their accompanying drainage points;
- vii) Locations of haul and access roads.
- viii) Rail cars and tracks;
- ix) Arrows showing direction of stormwater flow;
- x) Location of all receiving waters in the immediate vicinity of the municipal facility, indicating if any of the waters are impaired and, if so, whether the waters have TMDLs established for them.

- xi) Locations where stormwater flows have significant potential to cause erosion;
- xii) Location and source of run-on from adjacent property containing significant quantities of pollutants and/or volume of concern to the municipal facility; and
- xiii) Locations of the following areas where such areas are exposed to precipitation or stormwater:
 - (a) Fueling stations;
 - (b) Vehicle and equipment maintenance and/or cleaning areas;
 - (c) Loading/unloading areas;
 - (d) Locations used for the treatment, storage or disposal of wastes;
 - (e) Liquid storage tanks;
 - (f) Processing and storage areas.
 - (g) Locations where significant materials, fuel or chemicals are stored and transferred.
 - (h) Locations where vehicles and/or machinery are stored when not in use;
 - (i) Transfer areas for substances in bulk.
 - (j) Location and description of non-stormwater discharges (Part I.A.3.);
 - (k) Locations where spills³⁵ or leaks have occurred; and
 - (l) Locations of all existing structural BMPs.

f) Stormwater Best Management Practices (BMPs)

The municipal facility specific SWPPP also documents the location and type of BMPs implemented at the municipal facility. The municipal facility specific SWPPP must describe how each BMP is being implemented for all the potential pollutant sources.

g) Municipal facility assessments

The municipal facility specific SWPPP includes a schedule for completing and recording results of routine and comprehensive site assessments.

ii. Municipal Facility Assessments (Done under the MSGP)

- a) Wet Weather Visual Monitoring
 - i) Once every five (5) years, the ECSD #6 conducts wet weather visual monitoring at all monitoring locations and other sites of stormwater leaving the site that are discharging stormwater from fueling areas, storage areas, vehicle and equipment maintenance/fueling areas, material handling areas and similar potential pollutant generating areas.
 - (a) All samples must be collected from discharges resulting from a qualifying storm event. The storm event must be documented using the Storm Event Data Form (Appendix I) and kept with the municipal facility specific SWPPP. The sample must be taken during the first thirty (30) minutes (or as soon as practical, but not to exceed one hour) of the discharge at the monitoring location.

- (b) No analytical tests are required to be performed on the samples for the purpose of meeting the visual monitoring requirements.
- (c) The visual examination must document observations of color, odor, clarity, floating solids, settled solids, suspended solids, foam, oil sheen, and any other obvious indicators of stormwater pollution.
- (d) The visual examination of the sample must be conducted in a well-lit area.
- (e) Where practicable, the same individual should carry out the collection and examination of discharges for the entire permit term for consistency.
- (f) The MS4 Operator must document the visual examination using the Visual Monitoring Form (Appendix I) and keep it with the municipal facility specific SWPPP to record:
 - (i) Monitoring location ID;
 - (ii) Examination date and time;
 - (iii) Personnel conducting the examination;
 - (iv) Nature of the discharge (runoff or snowmelt);
 - (v) Visual quality of the stormwater discharge including observations of color, odor, clarity, floating solids, settled solids, suspended solids, foam, oil sheen, and other obvious indicators of stormwater pollution; and
 - (vi) Probable sources of any observed stormwater contamination.
- (vii) Corrective and follow up actions – If the visual examination indicates the presence of color, odor, floating solids, settled solids, suspended solids, foam, oil sheen, or other indicators of stormwater pollution, at minimum, the ECSD #6 will complete and document the following actions:
 - (1) Evaluate the facility for potential sources.
 - (2) Remedy the problems identified.
 - (3) Revise the municipal facility specific SWPPP; and
 - (4) Perform an additional visual inspection during the first qualifying storm event following implementation of the corrective action. If the first qualifying storm event does not occur until the next visual monitoring period, this follow up action may be used as the next visual inspection.

b) The monitoring locations inspection and sampling program includes all ECSD #6 municipal facilities.

c) Comprehensive Site Assessments

- i) Once every five (5) years following the most recent assessment, the ECSD #6 will complete a comprehensive site assessment for each high priority municipal facility as identified in the inventory using the Municipal Facility Assessment Form (Appendix J) or an equivalent form containing the same information, and document it in the municipal facility specific SWPPP and SWMP Plan that:

(a) The municipal facility is in compliance with the terms and conditions of the NYSDEC SPDES General Permit for Stormwater Discharges from Municipal Separate Storm Sewer

Systems (GP-0-24-001);

(b) Deficiencies were identified, and all reasonable steps taken to minimize any discharge in violation of the permit, which has a reasonable likelihood of adversely affecting human health or the environment.

(i) Within twenty-four (24) hours, the MS4 Operator must prepare a schedule that includes corrective actions and specific interim milestones to be implemented until the corrective action is implemented; or

(c) Deficiencies were identified, and all reasonable steps taken to minimize any discharge in violation of the permit, which does not have a reasonable likelihood of adversely affecting human health or the environment.

(i) Within seven (7) days, the MS4 Operator must prepare a schedule that includes corrective actions and specific interim milestones to be implemented until the corrective action is implemented.

e. Low Priority Municipal Facility Requirements (applies only for the ECSD No. 6 pumping stations)

i. The MS4 Operator must identify procedures outlining BMPs for the types of activities that occur at the low priority municipal facilities. A municipal facility specific SWPPP is not required.

ii. Municipal Facility Assessments

a) Low priority municipal facilities are not required to conduct wet weather visual monitoring.

b) The monitoring locations inspection and sampling program is conducted at the municipal facility.

c) Comprehensive Site Assessments

i) Once every five (5) years following the most recent assessment, the ECSD #6 will complete a comprehensive site assessment for each low priority municipal facility as identified in the inventory using the Low Priority Municipal Facility Assessment Form (Appendix K) or an equivalent form containing the same information, and document in the SWMP Plan that:

(a) The municipal facility is in compliance with the terms and conditions of the NYSDEC SPDES General Permit for Stormwater Discharges from Municipal Separate Storm Sewer Systems (GP-0-24-001);

(b) Deficiencies were identified, and all reasonable steps taken to minimize any discharge in violation of the permit, which has a reasonable likelihood of adversely affecting human health or the environment.

- Within twenty-four (24) hours, the ECSD #6 must prepare a schedule that includes corrective actions and specific interim milestones to be implemented until the corrective action is implemented; or

(c) Deficiencies were identified, and all reasonable steps taken to minimize any discharge in violation of the permit, which does not have a reasonable likelihood of adversely affecting human health or the environment.

- Within seven (7) days, the MS4 Operator must prepare a schedule that includes corrective actions and specific interim milestones to be implemented until the corrective action is implemented.

3. Municipal Operations & Maintenance

a. Municipal Operations Program

Municipal operations in the ECSD #6 are: Storm sewer system that only consist of manhole (MH), catch basin (CB)), and pipe.

Within three (3) years

The ECSD #6 has a municipal operations program. The municipal operations program is documented in the SWMP Plan specifying:

- i. The municipal operations procedures as follows:
 - a) The BMPs incorporated into the municipal operations program;
 - b) The municipal operations corrective actions requirements.
 - d) storm sewer system (only MH, CB, and Pipe) maintenance requirements; and
 - e) All other municipal operations maintenance requirements.
- ii. The ECSD #6, in partnership with the Western NY Stormwater Coalition, has an employee training program addressing its municipal operations procedures. This training addresses municipal operations procedures and is conducted concurrently with municipal facility procedures.
 - a) All new staff that are charged with conducting municipal operations procedures will receive training prior to conducting municipal operations procedures;
 - b) All existing staff, that are charged with conducting any municipal operations procedures will receive training prior to conducting municipal operations procedures and, once every five (5) years, thereafter; and
 - c) If the municipal operations procedures are updated, all staff will receive training on the updates prior to conducting municipal operations procedures.
- iii. The names, titles, and contact information for the individuals who have received municipal operations procedures training is updated annually;
- iv. Annually, by April 1, the ECSD #6 reviews and updates its municipal operations procedures.

Compliance documentations are listed in **Appendix B**

b. Municipal Operations Corrective Actions

i. For municipal operations, ECSD #6 must either:

- a) Ensure compliance with the terms and conditions of the NYSDEC SPDES General Permit for Stormwater Discharges from Municipal Separate Storm Sewer Systems (GP-0-24-001; or
- b) Implement corrective actions according to the following schedule and, after implementation, ensure the operations are in compliance with the terms and conditions of the NYSDEC SPDES General Permit for Stormwater Discharges from Municipal Separate Storm Sewer Systems (GP-0-24-001):
 - i) Within twenty-four (24) hours of discovery for situations that have a reasonable likelihood of adversely affecting human health or the environment.
 - ii) Initiated within seven (7) days of inspection and completed within

thirty (30) days of inspection for situations that do not have a reasonable likelihood of adversely affecting human health or the environment; and

iii) For corrective actions that require special funding or construction that will take longer than thirty (30) days to complete, a schedule will be prepared that specifies interim milestones to ensure compliance in the shortest reasonable time.

c. Catch Basin Inspection and Maintenance

Within three (3) years

The ECSD #6 has a catch basin inspection and maintenance program that targets its MS4 Regulated area (see map **Appendix A**). The program entails the following:

i. Identifies when catch basin inspection is needed with consideration for:

- a) Areas with construction activities.
- b) Residential, commercial, and industrial areas.
- c) Recurring or history of issues; or
- d) Confirmed citizen complaints on three or more separate occasions in the last twelve (12) months.

ii. An inventory of catch basin inspection information is maintained and includes the following information

- a) Date of inspection;
- b) Approximate level of trash, sediment, and/or debris captured at time of clean-out
 - no trash, sediment, and/or debris;
 - <50% of the depth of the sump;
 - >50% of the depth of the sump);
- c) Depth of structure.
- d) Depth of sump; and
- e) Date of clean out, if applicable.

iii. Based on inspection results, catch basins will be cleaned out within the following timeframes:

- a) Within six (6) months after the catch basin inspection, catch basins which had trash, sediment, and/or debris exceeding 50% of the depth of the sump must be cleaned out;
- b) Within one (1) year after the catch basin inspection, catch basins which had trash, sediment, and/or debris at less than 50% of the depth of the sump must be cleaned out; and
- c) MS4 Operators are not required to clean out catch basins if the catch basins are operating properly and:
 - i. There is no trash, sediment, and/or debris in the catch basin; or

- ii. The sump depth of the catch basin is less than or equal to two (2) feet.
- iv. The ECSD #6 catch basin inspection and maintenance program includes the following practices for properly managing materials removed from catch basins during clean out operations (handling and disposal) so that:
 - a) Water removed during the catch basin cleaning process will not re-enter the MS4 or surface waters of the State;
 - b) Material removed from catch basins is disposed of in accordance with any applicable environmental laws and regulations; and
 - c) Material removed during the catch basin cleaning process will not Re-enter the MS4 or surface waters of the State.
- v. The catch basin inspection and maintenance operations process can be used to determine if there are signs/evidence of illicit discharges and procedures for referral/follow-up if illicit discharges are encountered.

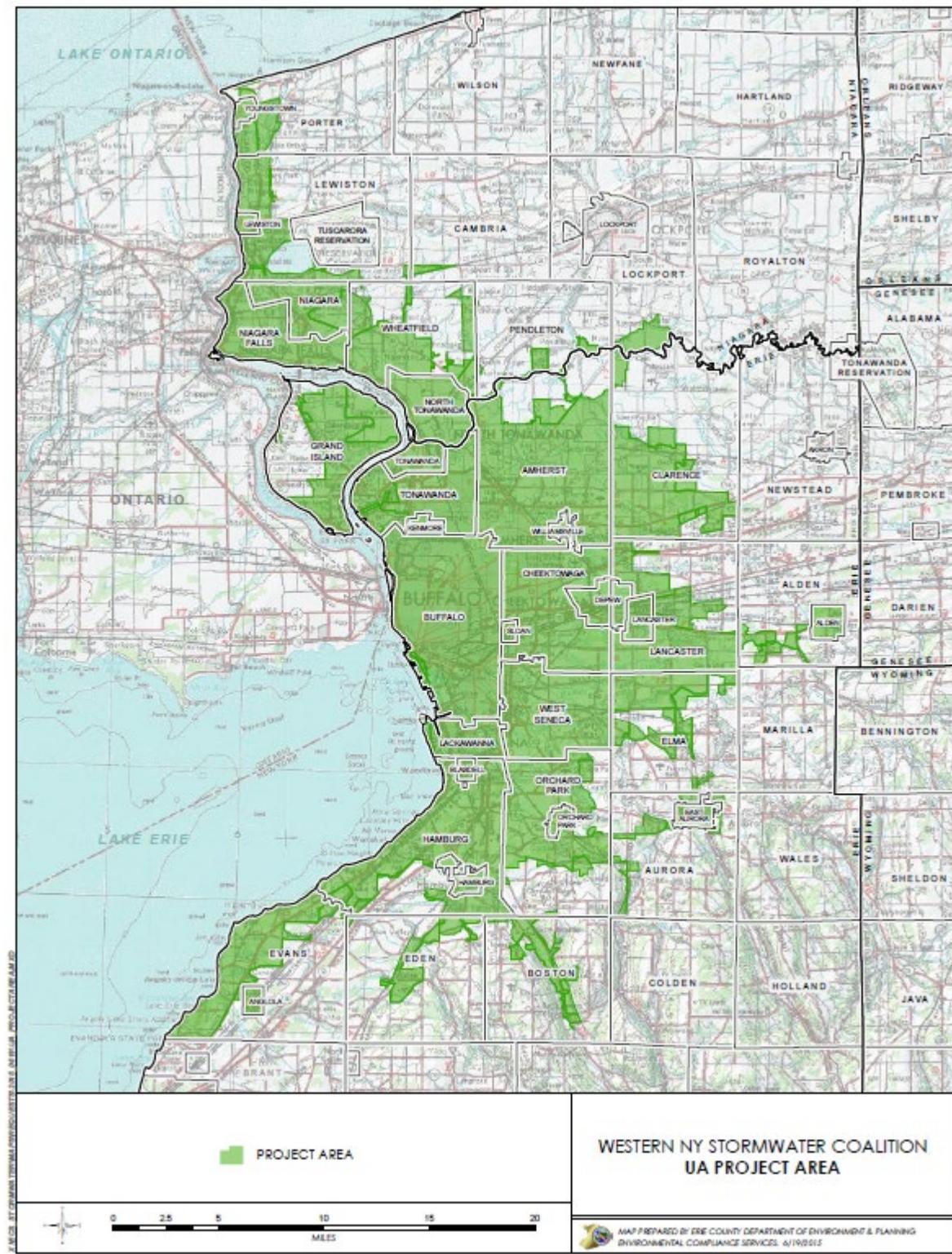
d. Roads, Bridges, Parking Lots, & Right of Way Maintenance

N/A to ECSD #6.

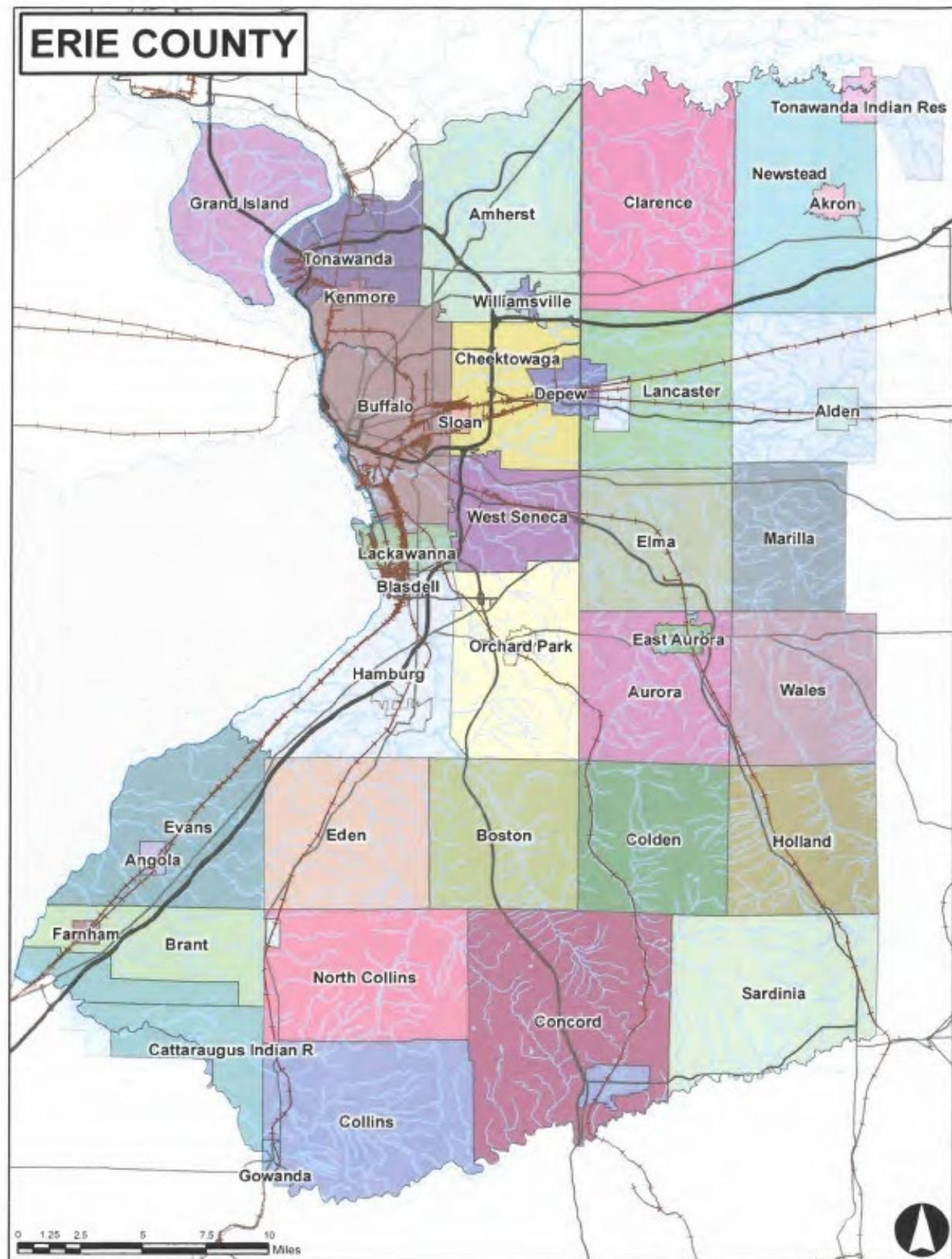
Part VIII. Enhanced Requirements for Impaired Waters

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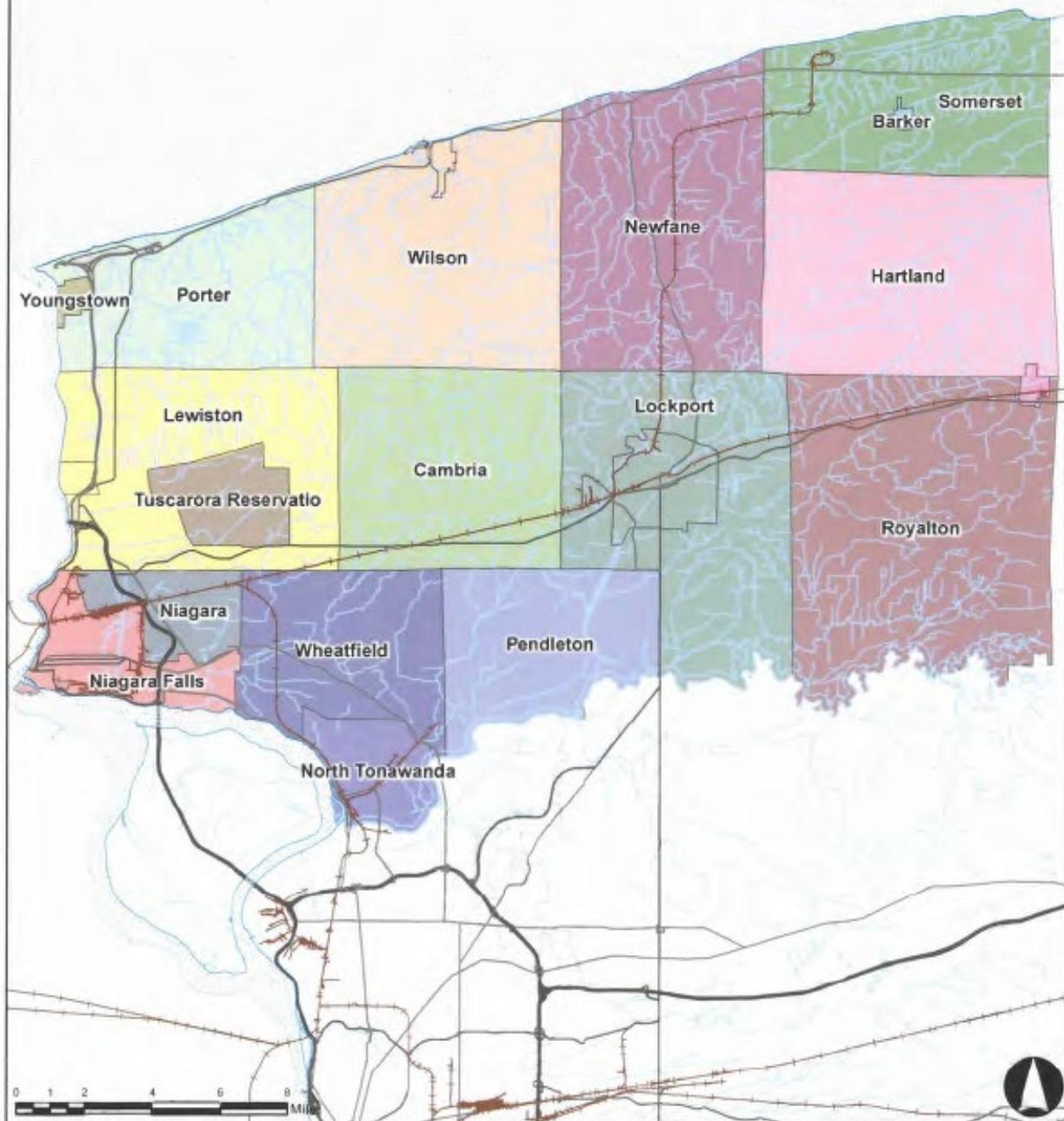
Part VIII: Enhanced Requirements for Impaired Waters in Appendix P (page no. 89)
as part of the ECSD No. 6 outfalls discharges into the impaired
South Branch Smoke Cr, Lower, and trib (0101-0036). The two pollutants of concern are **Phosphorus and Silt/Sediment.** Therefore, ECSD No. 6 is subject to Enhanced Requirements for Impaired Waters.



ERIE COUNTY



NIAGARA COUNTY



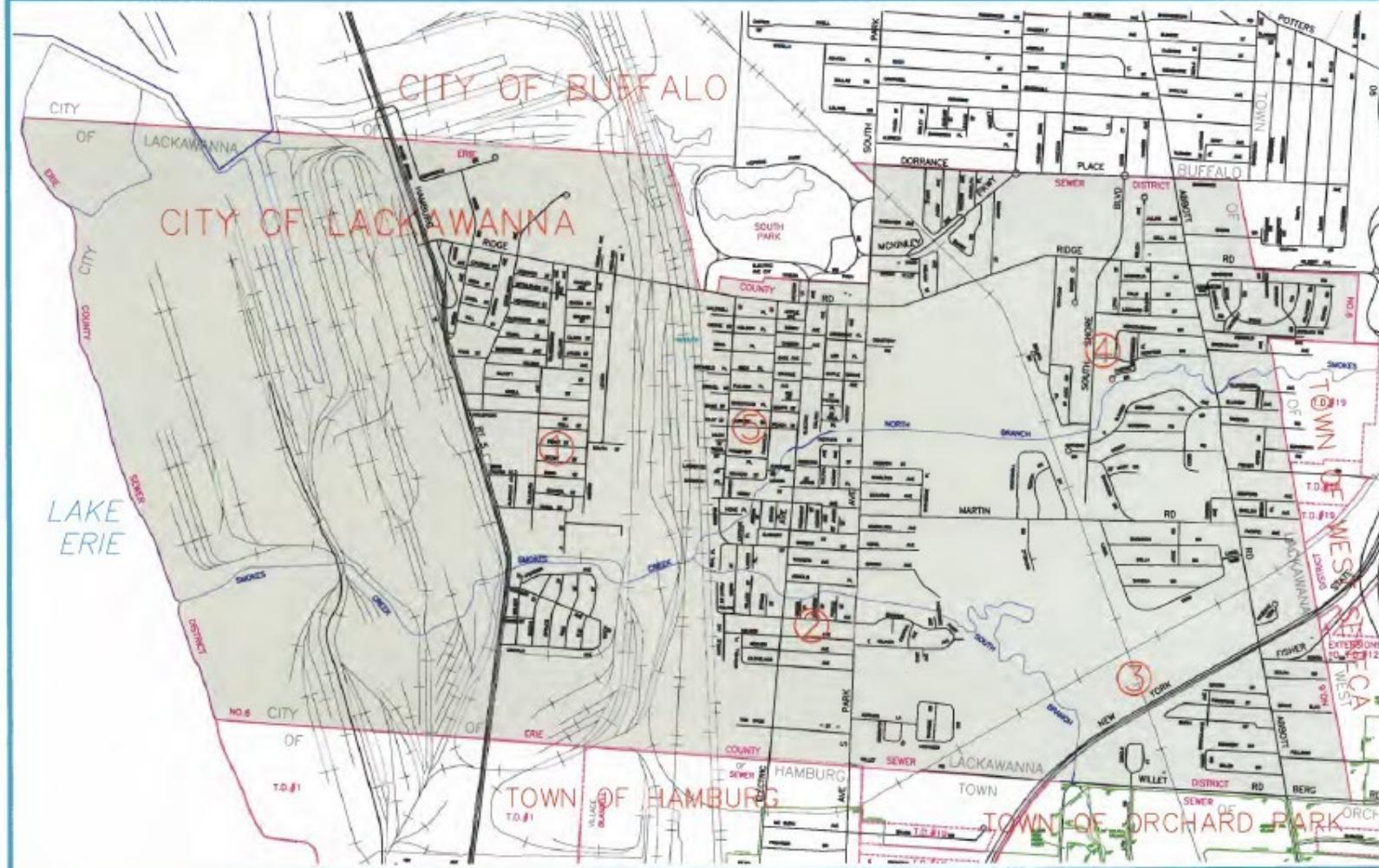


THE CITY OF LACKAWANNA IS ERIE COUNTY SEWER DISTRICT NO. 6

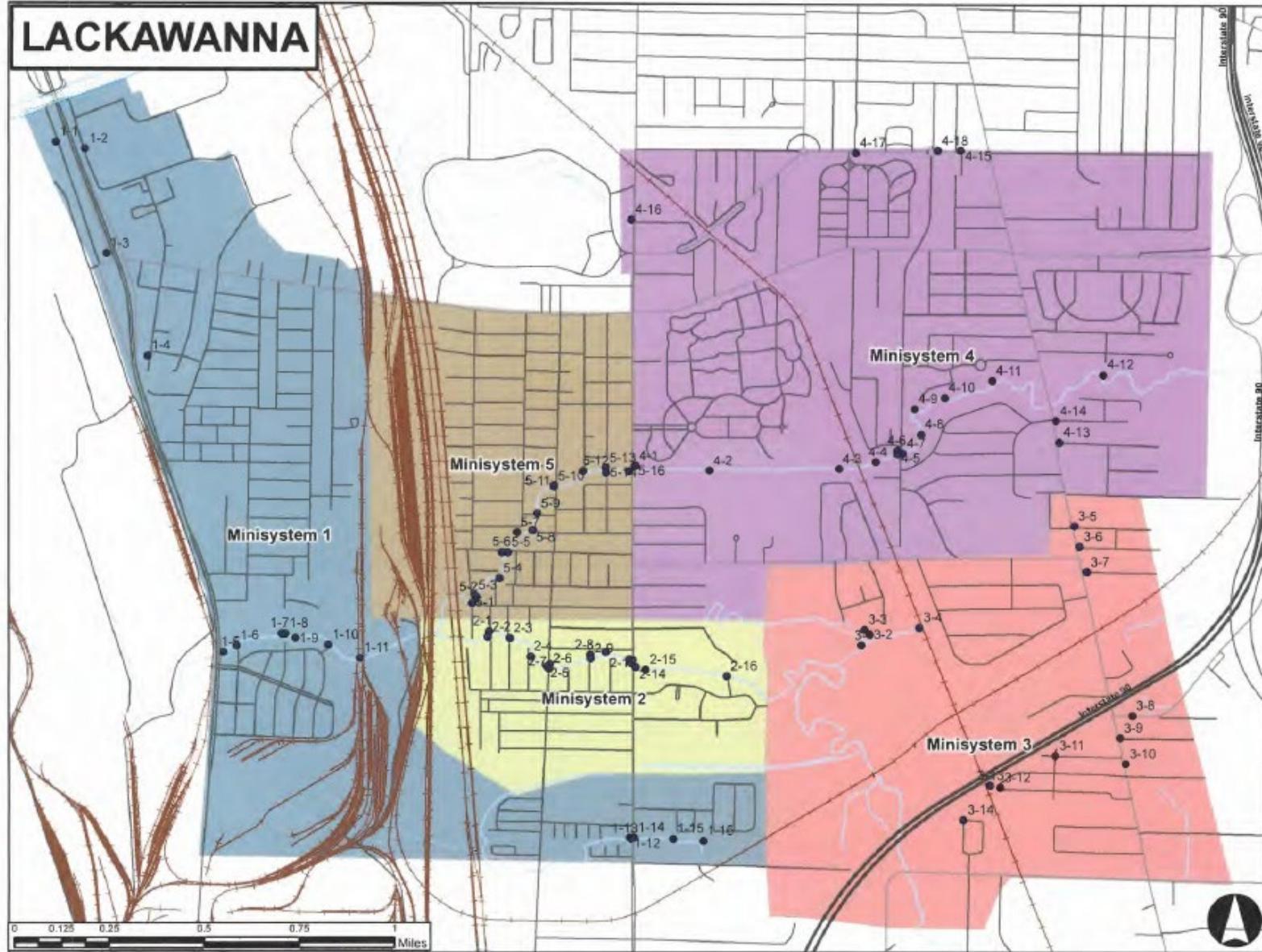
⊗ MINISYSTEM



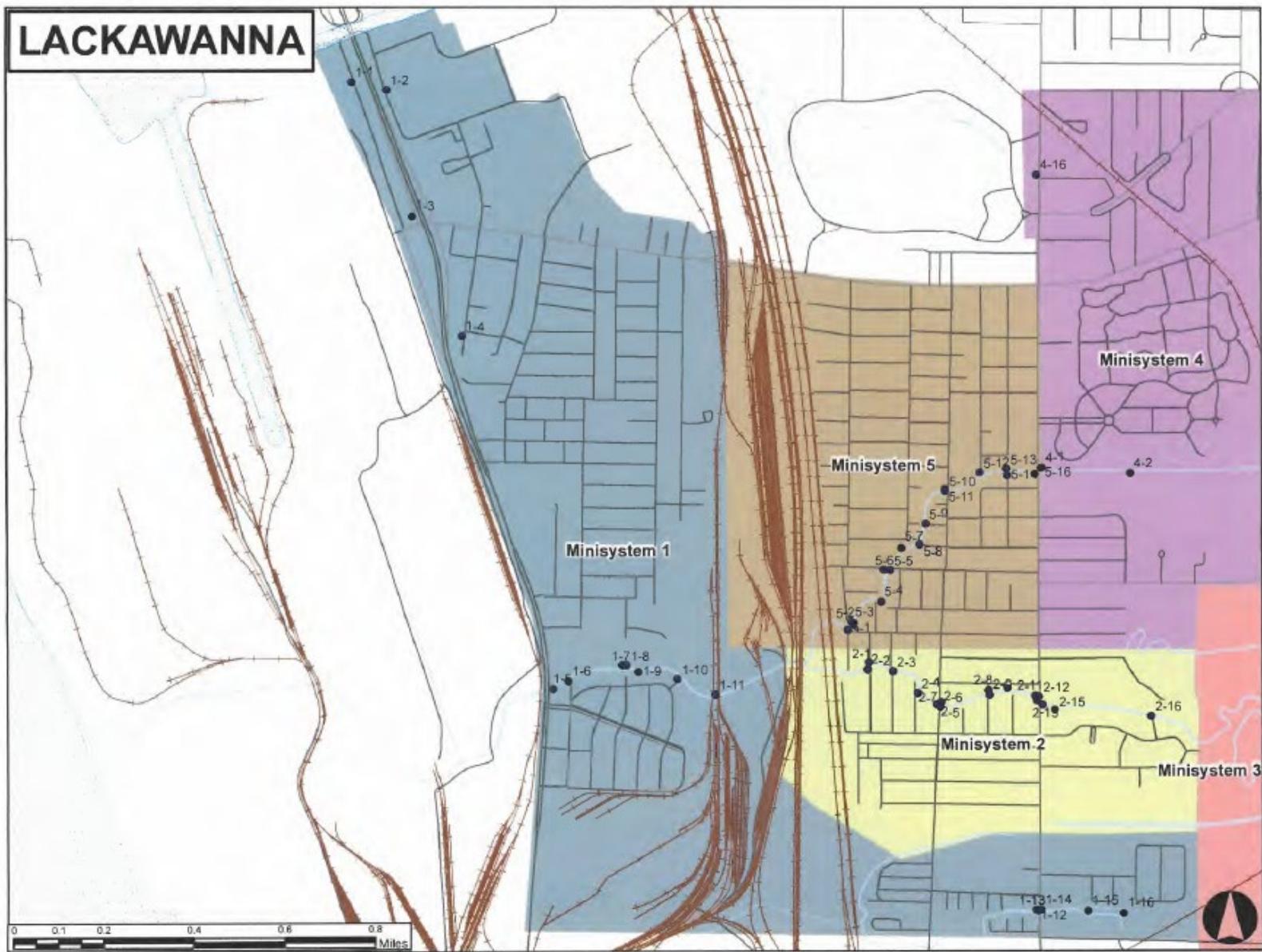
ERIE COUNTY
DEPARTMENT OF ENVIRONMENT AND PLANNING
DIVISION OF SEWERAGE MANAGEMENT
95 FRANKLIN ST. BUFFALO, N.Y. 14202



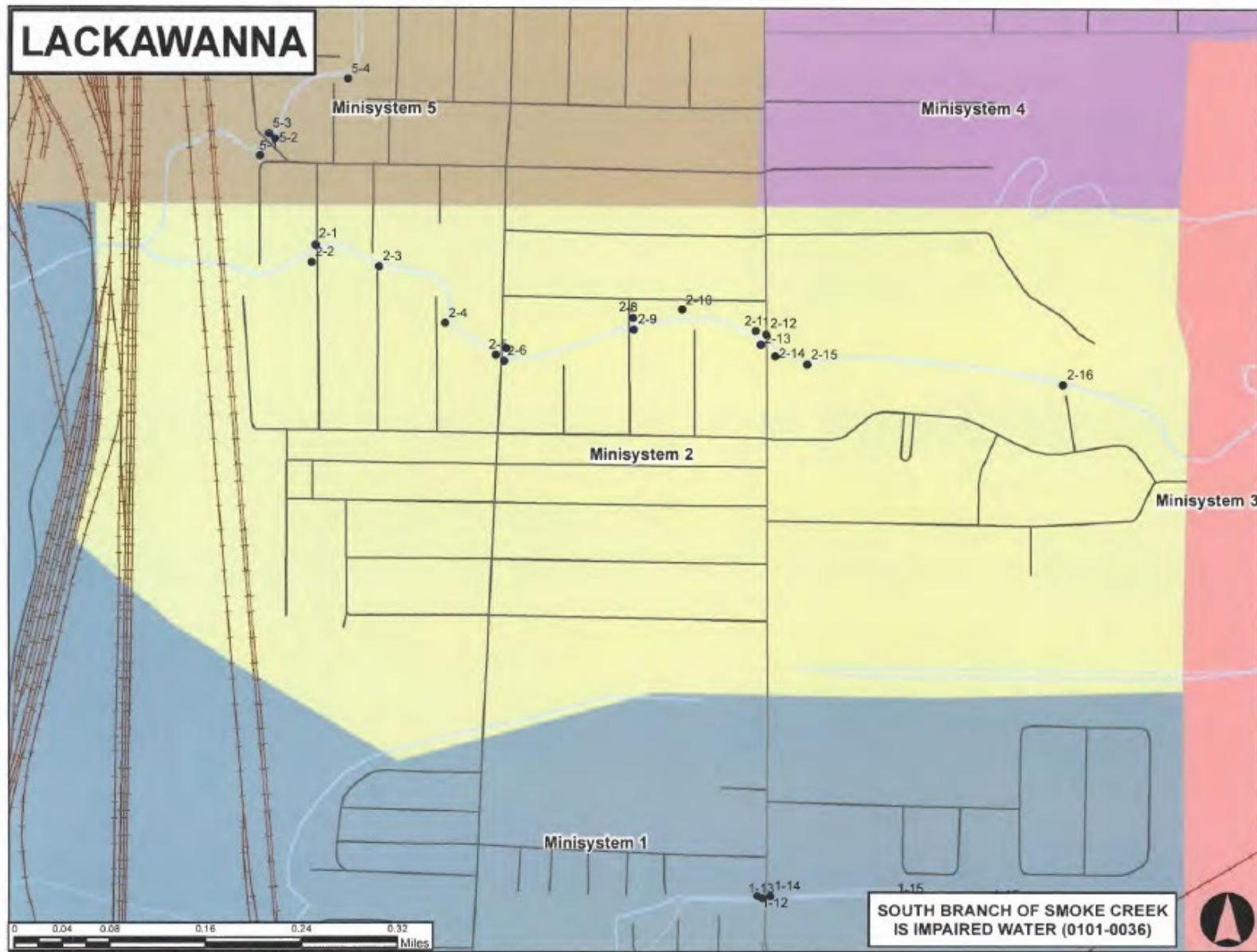
LACKAWANNA

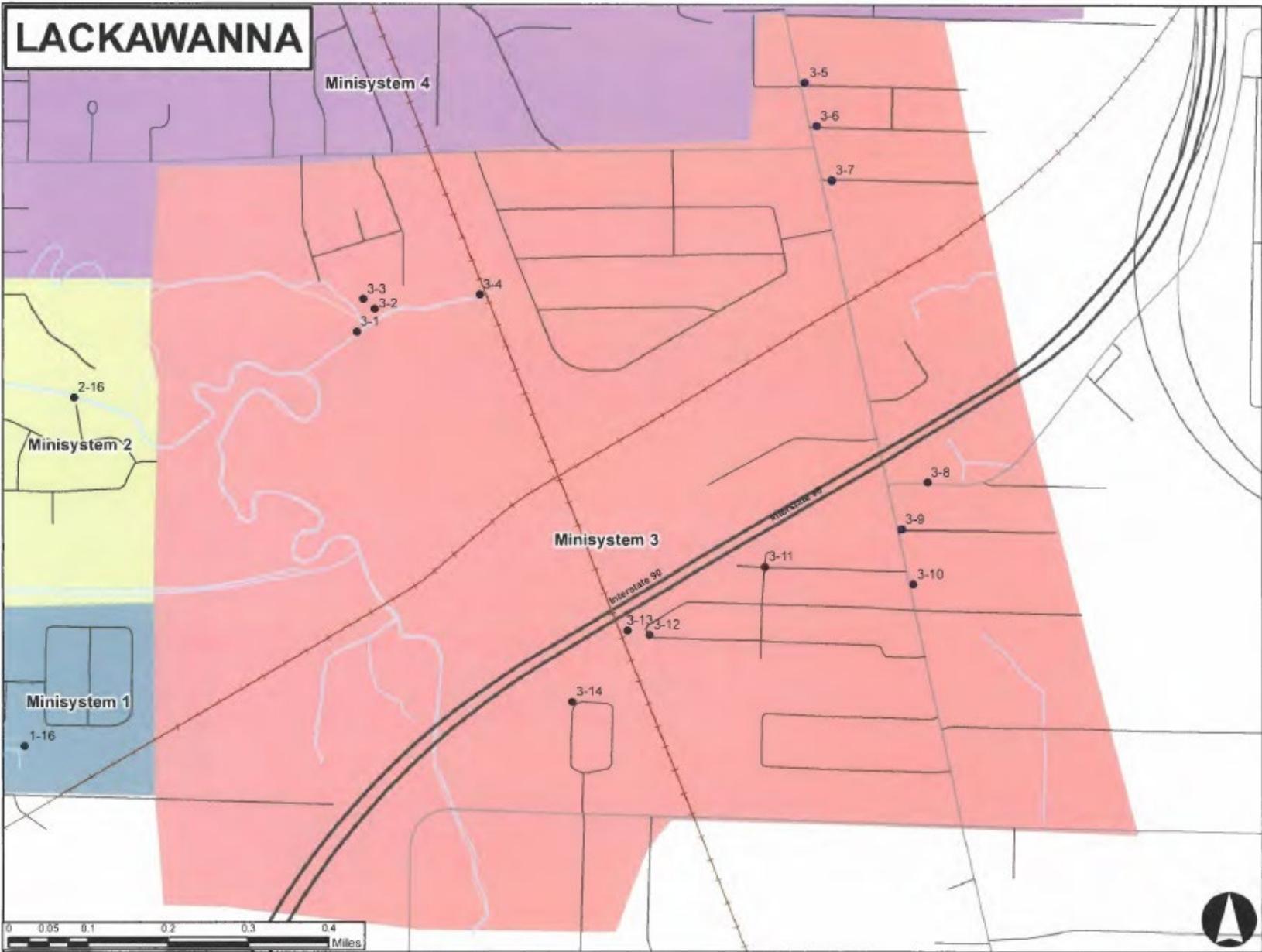


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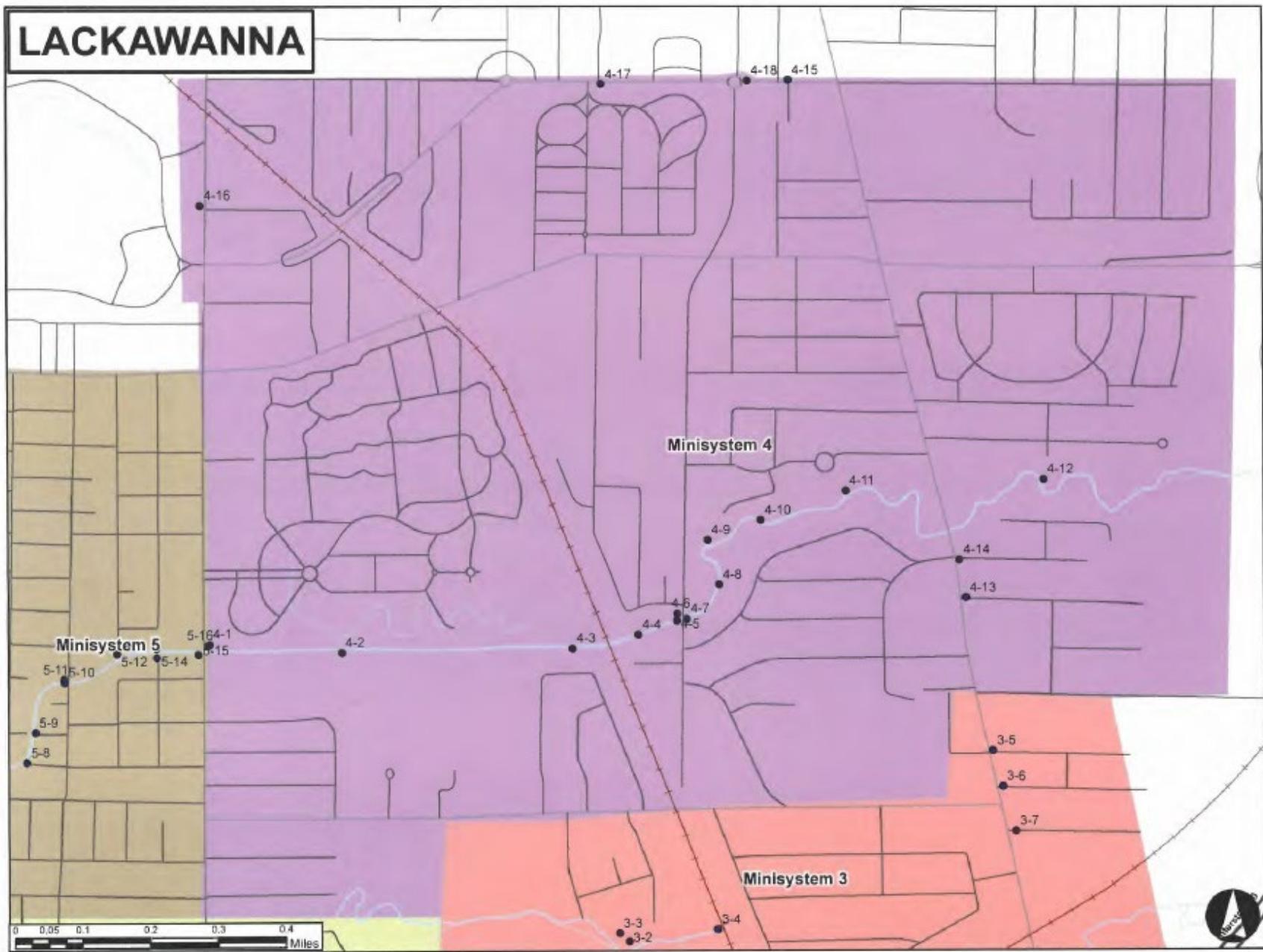


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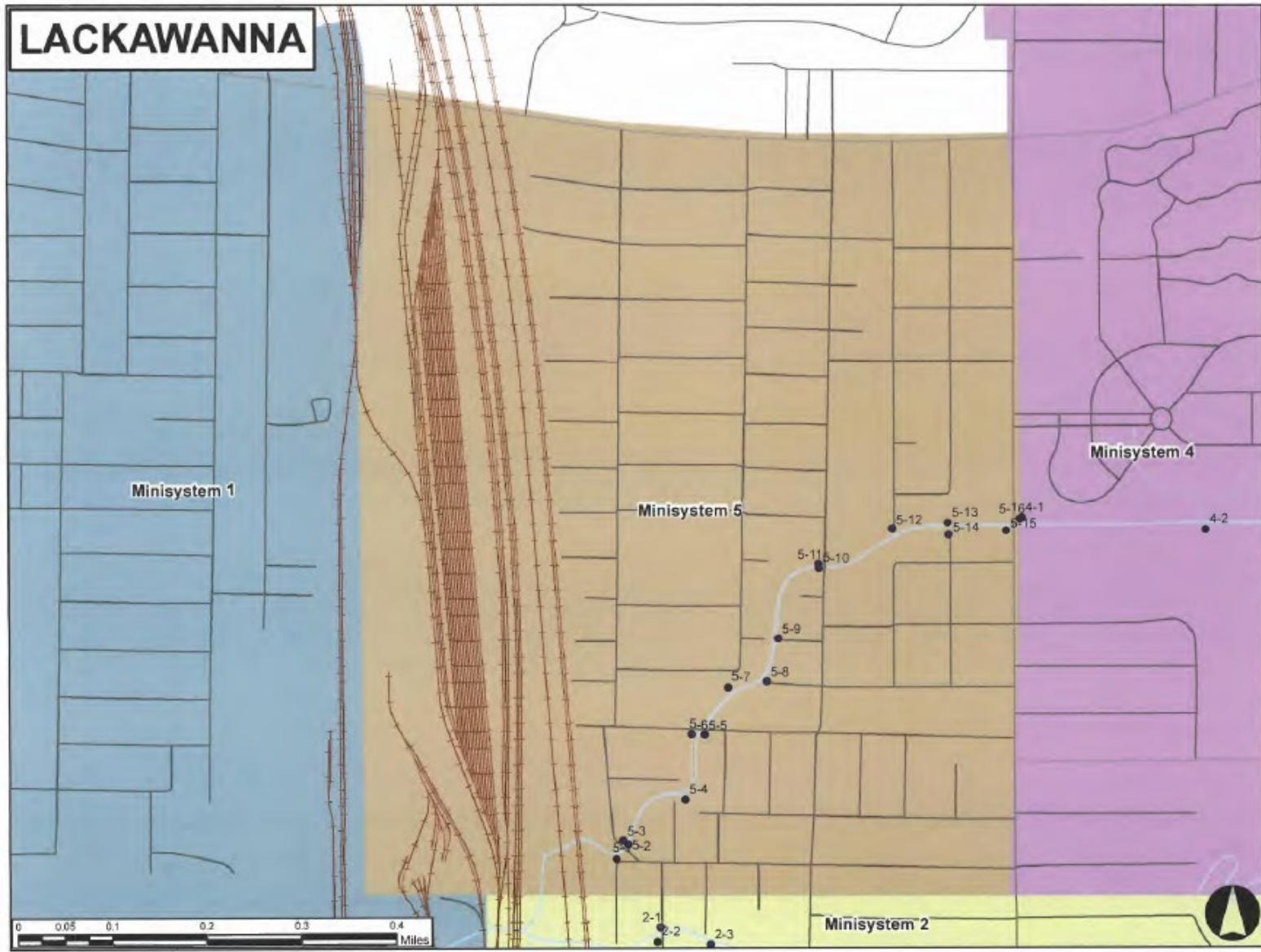




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**A. MCM1 – Public Education and Outreach Program
Compliance Documentation**

Once every 5 years, the ECSD #6 directs an educational message to target audience(s) for each focus area(s) based on the defined education and outreach topic(s) listed in this Stormwater Management Program Plan. Listed below are the date(s) of completion and method of distribution for each message.

i. Residents:Landscaping and lawn care:

Date of completion: _____

Method used: _____

Dog waste:

Date of completion: _____

Method used: _____

Household hazardous waste disposal:

Date of completion: _____

Method used: _____

Vehicle washing:

Date of completion: _____

Method used: _____

Illicit Discharge:

Date of completion: _____

Method used: _____

ii. Commercial: Business owners and staff:Landscaping and lawn care:

Date of completion: _____

Method used: _____

Vehicle fueling:

Date of completion: _____

Method used: _____

Vehicle maintenance:

Date of completion: _____

Method used: _____

Uncovered materials exposure/storage:

Date of completion: _____

Method used: _____

Illicit Discharge:

Date of completion: _____

Method used: _____

iii. Institutions: Managers, staff, and students (institutions not subject to SPDES MS4/MSGP Stormwater Permitting)

Uncovered materials exposure/storage:

Date of completion: _____

Method used: _____

iv. Construction: Developers, contractors, and design professionals: N/A to ECSD #6

v. Industrial: Owners and staff: (industry not subject to SPDES MSGP Stormwater Permit)

Uncovered materials exposure/storage:

Date of completion: _____

Method used: _____

vi. MS4 Operator's municipal staff: This is covered by the Multi-Sector permit for Lackawanna WRRF. However, insert date when completed and method used. If not applicable, indicate so.

Uncovered materials exposure/storage

Date of completion: _____

Method used: _____

Preventative maintenance:

Date of completion: _____

Method used: _____

Spill prevention and response:

Date of completion: _____

Method used: _____

Erosion and Sediment Controls:

Date of completion: _____

Method used: _____

Vegetated areas and open space:

Date of completion: _____

Method used: _____

Salt storage:

Date of completion: _____

Method used: _____

Waste, garbage and floatable debris:

Date of completion: _____

Method used: _____

Illicit Discharge:

Date of completion: _____

Method used: _____

Updates to the Public Education and Outreach Program

Annually, by **April 1**: The ECSD #6 reviews and updates, if necessary, the focus areas, target audiences, and/or education and outreach topics. Listed below are the date(s) of review and description of update.

Date of Review	Description of Update

B. MCM 2 - Public Involvement/Participation

Public involvement/participation in the development and implementation of the ECSD #6 SWMP includes opportunities to: review the SWMP Plan; submit comments; ask questions; and, become involved in the SWMP.

To document (annually), enter date(s) of completion, if N/A indicate so:

Citizen advisory group on stormwater management

Description: _____

Method used: _____

Dates of completion: _____

Public hearings or meetings

Description: _____

Method used: _____

Dates of completion: _____

Citizen volunteers to educate other individuals about the SWMP

Description: _____

Method used: _____

Dates of completion: _____

Coordination with other pre-existing public involvement/participation opportunities

Description: _____

Method used: _____

Dates of completion: _____

Reporting concerns about activities or behaviors observed

Description: _____

Method used: _____

Dates of completion: _____

Stewardship activities

Description: _____

Method used: _____

Dates of completion: _____

Public Notice and Input Requirements for Draft Annual Report

Annually, the ECSD #6 provides an opportunity for the public to review and comment on the draft Annual Report. Listed below are the date(s) of review and description of the opportunity provided.

Date of Review	Description of Opportunity

Consideration of Public Input

Annually, the ECSD #6 documents a summary of comments received on the SWMP Plan and draft Annual Report. Listed below are the comments and date received (if no comments were received, date and note in description).

Date Received	Description of SWMP Plan Comments

Date Received	Description of Draft Annual Report Comments

Within **thirty (30) days** of when public input is received, the MS4 Operator must update the SWMP Plan, where appropriate, based on the public input received. Listed below are the updates and effective date (if no updates are made, note in description).

Date of Update	Description of SWMP Plan Update

C. MCM 3 - Illicit Discharge Detection and Elimination**1. Illicit Discharge Detection**

Public Reporting of Illicit Discharges

Within thirty (30) days of an illicit discharge, each report of an illicit discharge is documented below.

Date of the report: _____

Location of the illicit discharge: _____

Nature of the illicit discharge: _____

Follow up actions taken or needed (including response times): _____

Inspection outcomes and any enforcement taken: _____

.....

Date of the report: _____

Location of the illicit discharge: _____

Nature of the illicit discharge: _____

Follow up actions taken or needed (including response times): _____

Inspection outcomes and any enforcement taken: _____

.....

Date of the report: _____

Location of the illicit discharge: _____

Nature of the illicit discharge: _____

Follow up actions taken or needed (including response times): _____

Inspection outcomes and any enforcement taken: _____

Annually, the ECSD #6 updates the inventory for new monitoring locations that are constructed or discovered; or if information for existing monitoring locations change. Prioritization determinations are also addressed in the update.

Date of Update	Description Inventory Update(s)

Annually, the ECSD #6 reviews and updates the names, titles, and contact information for the individuals who have received illicit discharge training on the following:

- Monitoring locations inspection;
- Sampling procedures;
- Results interpretation;
- Source track down; and,
- Source elimination.

The Illicit Discharge Detection and Elimination training provided by the Western New York Stormwater Coalition is comprehensive and addresses all training requirements applicable to the IDDE Program.

Date of Update	Name, title & email of individual trained	Training Date

Annually, **by April 1**, the ECSD #6 reviews and updates its monitoring location inspection and sampling procedures based on results (e.g., trends, patterns, areas with illicit discharges, and common problems).

Date of Update	Description Inspection and Sampling Procedures Update(s)

D. MCM 4 – Construction Site Stormwater Runoff Control

N/A to ECSD #6 except for plans and SWPPP review and approval.

E. MCM 5 – Post-Construction Stormwater Management

N/A to ECSD #6

SWMP PLAN COMPLIANCE**Appendix B (continued)****F. MCM 6 – Pollution Prevention and Good Housekeeping**

Annually, the ECSD #6 reviews and updates the names, titles, and contact information for the individuals who have received municipal facility procedures training and municipal operations procedures training.

Date of Update	Name, Title & Email of Individual Trained	Training Date

Annually, by **April 1**, the ECSD #6 reviews and updates its municipal facility procedures and its municipal operations procedures.

Date of Update	Description Municipal Facility Procedures Update(s)

Date of Update	Description Municipal Operations Procedures Update(s)

Annually, the ECSD #6 updates its inventory of all municipal facilities.

Covered under Multi-Sector General Permit (MSGP)

Date of Update	Description Inventory Update(s)

Monitoring Locations Inspection and Sampling Field Sheet

APPENDIX C

Monitoring Locations Inspection and Sampling Field Sheet

Section 1: Background Data

Subwatershed:	Monitoring Location ID:		
Today's date:	Time (Military):		
Investigators:	Form completed by:		
Temperature (°F):	Rainfall (in.):	Last 24 hours:	Last 48 hours:
Latitude:	Longitude:	GPS Unit:	GPS LMK #:
Camera:	Photo #: _____		
Land Use in Drainage Area (Check all that apply):			
<input type="checkbox"/> Industrial <input type="checkbox"/> Ultra-Urban Residential <input type="checkbox"/> Suburban Residential <input type="checkbox"/> Commercial		<input type="checkbox"/> Open Space <input type="checkbox"/> Institutional Other: _____ Known Industries: _____	
Notes (e.g., origin, if known):			

Section 2: Monitoring Location Description

LOCATION	MATERIAL	SHAPE	DIMENSIONS (IN.)	SUBMERGED	
<input type="checkbox"/> Closed Pipe	<input type="checkbox"/> RCP <input type="checkbox"/> CMP <input type="checkbox"/> PVC <input type="checkbox"/> HDPE <input type="checkbox"/> Steel <input type="checkbox"/> Other: _____	<input type="checkbox"/> Circular <input type="checkbox"/> Elliptical <input type="checkbox"/> Box <input type="checkbox"/> Other: _____	<input type="checkbox"/> Single <input type="checkbox"/> Double <input type="checkbox"/> Triple <input type="checkbox"/> Other: _____	Diameter/Dimensions: _____ In Water: <input type="checkbox"/> No <input type="checkbox"/> Partially <input type="checkbox"/> Fully	
				With Sediment: <input type="checkbox"/> No <input type="checkbox"/> Partially <input type="checkbox"/> Fully	
	<input type="checkbox"/> Open drainage	<input type="checkbox"/> Concrete <input type="checkbox"/> Earthen <input type="checkbox"/> Rip-Rap <input type="checkbox"/> Other: _____	<input type="checkbox"/> Trapezoid <input type="checkbox"/> Parabolic <input type="checkbox"/> Other: _____	Depth: _____ Top Width: _____ Bottom Width: _____	
<input type="checkbox"/> In-Stream		(applicable when collecting samples)			
Flow Present?		<input type="checkbox"/> Yes <input type="checkbox"/> No	If No, Skip to Section 5		
Flow Description (If present)	<input type="checkbox"/> Trickle <input type="checkbox"/> Moderate <input type="checkbox"/> Substantial				

Section 3: Quantitative Characterization

FIELD DATA FOR FLOWING MONITORING LOCATIONS				
PARAMETER		RESULT	UNIT	EQUIPMENT
<input type="checkbox"/> Flow #1	Volume		Liter	Bottle
	Time to fill		Sec	
<input type="checkbox"/> Flow #2	Flow depth		In	Tape measure
	Flow width	____ " ____ "	Ft, In	Tape measure
	Measured length	____ " ____ "	Ft, In	Tape measure
	Time of travel		S	Stopwatch
Temperature		°F	Thermometer	
pH		pH Units	Test strip/Probe	
Ammonia		mg/L	Test strip	

Monitoring Locations Inspection and Sampling Field Sheet -APPENDIX C Cont'd

Monitoring Locations Inspection and Sampling Field Sheet

Section 4: Physical Indicators for Flowing Monitoring Locations Only

Are Any Physical Indicators Present in the flow? Yes No (If No, Skip to Section 5)

INDICATOR	CHECK if Present	DESCRIPTION	RELATIVE SEVERITY INDEX (1-3)
Odor	<input type="checkbox"/>	<input type="checkbox"/> Sewage <input type="checkbox"/> Narcotic/gas <input type="checkbox"/> Petroleum/gas	<input type="checkbox"/> 1 = Faint <input type="checkbox"/> 2 = Easily detected <input type="checkbox"/> 3 = Noticeable from a distance
	<input type="checkbox"/>	<input type="checkbox"/> Surface <input type="checkbox"/> Other	
Color	<input type="checkbox"/>	<input type="checkbox"/> Clear <input type="checkbox"/> Brown <input type="checkbox"/> Gray <input type="checkbox"/> Yellow	<input type="checkbox"/> 1 = Faint colors in sample bottle
	<input type="checkbox"/>	<input type="checkbox"/> Green <input type="checkbox"/> Orange <input type="checkbox"/> Red <input type="checkbox"/> Other	<input type="checkbox"/> 2 - Clearly visible in sample bottle
Turbidity	<input type="checkbox"/>	See severity	<input type="checkbox"/> 3 - Clearly visible in flow
Floating	<input type="checkbox"/>	<input type="checkbox"/> Sewage (Toilet Paper, etc.) <input type="checkbox"/> Suds	<input type="checkbox"/> 1 = Slight cloudiness
-Does Not Include Trash	<input type="checkbox"/>	<input type="checkbox"/> Petroleum (oil sheen) <input type="checkbox"/> Other:	<input type="checkbox"/> 2 - Cloudy
			<input type="checkbox"/> 3 = Opaque

Section 5: Physical Indicators for Both Flowing and Non-Flowing Monitoring Locations

Are physical indicators that are not related to flow present? Yes No (If No, Skip to Section 6)

INDICATOR	CHECK if Present	DESCRIPTION	COMMENTS
Monitoring Location Damage	<input type="checkbox"/>	<input type="checkbox"/> Spalling, Cracking or Chipping <input type="checkbox"/> Peeling Paint	
		<input type="checkbox"/> Corrosion	
Deposit/Spills	<input type="checkbox"/>	<input type="checkbox"/> Oily <input type="checkbox"/> Flow Line <input type="checkbox"/> Paint	<input type="checkbox"/> Other:
Abnormal Vegetation	<input type="checkbox"/>	<input type="checkbox"/> Excessive <input type="checkbox"/> Infested	
Poor soil quality	<input type="checkbox"/>	<input type="checkbox"/> Odors <input type="checkbox"/> Colors <input type="checkbox"/> Flammable	<input type="checkbox"/> Oil Sheen
		<input type="checkbox"/> Suds <input type="checkbox"/> Extensive Algae	<input type="checkbox"/> Other
Pipe benthic growth	<input type="checkbox"/>	<input type="checkbox"/> Brown <input type="checkbox"/> Orange <input type="checkbox"/> Green	<input type="checkbox"/> Other

Section 6: Overall Monitoring Location Characterization

Unlikely Potential (presence of two or more indicators) Suspected (one or more indicators with a severity of 3) Obvious

Section 7: Data Collection

1. Sample for the lab?	<input type="checkbox"/> Yes <input type="checkbox"/> No
2. If yes, collected from:	<input type="checkbox"/> Flow <input type="checkbox"/> Pool
3. Intermittent flow trap set?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> If Yes, type: <input type="checkbox"/> CBM <input type="checkbox"/> Cauk dam

Section 8: Any Non-Illicit Discharge Concerns (e.g., trash or needed infrastructure repairs)?

Illicit Discharge Detection and Elimination Track Down Program **Appendix D**
IDDE Dry Weather Inspection and Outfall Testing Guide

Procedures for Dry Weather Inspection and IDDE

- I. Plan dry weather inspections
 - a. No precipitation/snow melt for preceding 72 hours
- II. Choose Monitoring Locations (aka outfalls)
 - a. Review previous outfall inspections; identify monitoring locations (outfalls) requiring inspection or any that may require re-inspection.
 - b. Prepare for dry weather inspection: Monitoring Locations Inspection and Sampling Field Sheet, outfall report/current data for all to be inspected, maps/route, clip board, pen.
- III. Inspect Monitoring Locations/Outfalls
 - a. Inspect each monitoring location scheduled for the year.
 - b. If you cannot find the end of the pipe or ditch, or it is inaccessible or unsafe to reach, locate the first upstream catch basin to determine whether or not there is flow. Note the inspection point on the form if it deviates from the mapped outfall. Make a note in your files as well for future inspectors. Complete Monitoring Locations Inspection and Sampling Field Sheet for each outfall
 - c. Hardcopy inspection form or inspection APP available from Western NY Stormwater Coalition.
 - d. Retain forms/APP reports as documentation of inspection for 5 years.
 - e. Schedule sampling for high priority monitoring locations (aka outfalls) discharging flow during dry weather
- IV. Document Inspections
 - a. Record monitoring locations inspected on spreadsheet or whatever you choose to use to track inspections. It doesn't have to be elaborate, just a tool to identify outfalls inspected and those in need of inspection.
 - e.g. Outfall ID and date inspected are adequate. You can add information as to whether it was flowing and a "Notes" column as well.
 - b. The Monitoring Locations Inspection and Sampling Field Sheet completed in the field are to be filed and retained as compliance documentation. You may also scan the completed forms. If you opt to scan, create a new folder for each year.

Illicit Discharge Detection and Elimination Track Down Program **Appendix D** **(continued)**

Procedures for Sampling and IDDE

- I. Outfalls discharging during dry weather will need to be investigated further to ensure there are no pollutants in the flow.
- II. Prepare for IDDE Testing
 - a. Prepare sampling equipment, field meters and testing supplies
 - b. Take system maps depicting outfall and conveyance system contributing area and Monitoring Locations Inspection and Sampling Field Sheet to record data
- III. Collect sample/field data according to Outfall Testing Guide (follows)
- IV. Lab Analysis/Track Down/Elimination
 - a. Conduct lab analysis on sample(s) according to Monitoring Location (Outfall) Testing Guide. Record results on Monitoring Locations Inspection and Sampling Field Sheet
 - b. Interpret results to characterize flow.
 - c. If pollutants are detected, initiate track down investigation to identify the source of contamination.
 - d. Eliminate source of contamination or if nature of the source prohibits elimination, utilize targeted education to inform/minimize the source (e.g. pet waste disposed in storm sewers: distribute information on proper disposal throughout neighborhood)
 - e. **Document all efforts taken to identify and eliminate the source of contamination. Retain forms as documentation of inspection for 5 years**

Monitoring Location (Outfall) Testing Guide

This document was prepared to serve as quick reference for field analyses of flowing outfalls using test strips for Ammonia, pH, Total Chlorine, Nitrite/Nitrate and Phosphate. Depending on the results and visual observations at the outfall, source identification and elimination of that source may be necessary as well as additional sampling.

pH, Temperature, Total Dissolved Solids (TDS) and Conductivity (Hanna Meter)

1. Turn on the Hanna Instruments pH /Temperature/Conductivity meter.
2. Remove cap on probe and rinse the probe end with distilled water.
3. In the field, place the probe in the sample collected for on-site analyses.
4. Record the results on the Track Down Field Report.
5. Rinse the probe with distilled water and replace the cap. **For extended time of storage, probe cap must be filled with pH Electrode Storage Solution or pH 4 Buffer solution.** Detailed instructions provided see insert entitled: *Care and Storage of pH Electrode*.

Note:

- This meter must be calibrated periodically as per instruction manual.
- If you cannot find your meter, there is a test strip for pH (below) and a basic thermometer will work.



Test Strips

When using test strips, keep wet fingers out of the container. Close cap tightly after use.
Store in a cool, dry place.

Ammonia (HACH # 4315-70)

Ammonia levels are tested to indicate presence of sanitary sewage in stormwater. Should high levels be detected, further investigation and source track down are required.

1. Dip strip into water sample.
2. Vigorously move it up and down in water sample for 30 seconds, making sure both pads are always submerged.
3. Remove test strip and shake off excess water.
4. Hold the strip level, with pad side up, for 30 seconds.
5. To read the result, turn the test strip over so that both pads face away from you.
6. Compare the color of the small pad to the color chart on the container.
7. Read the result through the clear plastic of the test strip.
8. Record the result on the Outfall Sampling Results form.



pH and Total Chlorine (LaMotte # 5049-36)

pH is measured to indicate potential industrial discharges.

Total chlorine is measured to indicate a tap water leak into the storm sewer system or possibly discharge of chlorinated pool/spa water.

1. Immerse test strip and remove with pads face up.
2. Do not shake off excess water.
3. Wait 15 seconds and immediately hold up vertically against the color chart on container.
4. Record the pH result on the Outfall Sampling Results form.
5. Using the same strip, record the results for Total Chlorine



Nitrite and Nitrate (LaMotte # 5049-39)

Sources of nitrite (NO_2) and nitrate (NO_3) in urban stormwater runoff include lawn and garden fertilizers, pet waste and failing septic tanks.

1. Using at least a cup-size sample, immerse test strip for 2 seconds and remove with pads face up.
2. Do not shake off excess water.
3. Wait 60 seconds and immediately hold up vertically against the color chart on container.
4. Record the Nitrite result on the Outfall Sampling Results form.
5. Using the same strip, record the results for Nitrate.



Phosphate (HACH # 4315-75)

Sources of phosphate/phosphorus in urban runoff include plant and leaf litter, soil particles, pet waste, road salt and lawn fertilizer. Lawns and roads account for the greatest loading.

1. Dip a strip into water for 5 seconds and remove.
2. Hold the strip level, with pad side up, for 45 seconds.
3. Do not shake excess water from the strip.
4. Compare the color of the small pad to the color chart on the container.
5. Record the result on the Outfall Sampling Results form.



ADDITIONAL TESTING

Detergents – Black Light/Cotton Pad

Indicates presence of optical brighteners, used in detergents to whiten fabrics, which fluoresce under ultraviolet light. Sources of detergents include failing septic systems, improperly connected laundry discharges and industrial sources.

1. Soak cotton pad with sample.
2. Place under black light. If it fluoresces, detergents are present.
3. Under bright light conditions, you may have to move to a dark area or devise a box to block light.
4. Record the detection or absence of detergents on the Outfall Sampling Results Form.



Note: If an intermittent discharge is suspected, the cotton pad can be secured at the outfall or an upstream point (such as suspended in a storm DI) for a given length of time during dry weather before black light exposure.

Construction Activities that Require SWPPP

Construction activity is N/A to ECSD No. 6.

Appendix E

SWPPP Review Checklist

Appendix F

ECSD No. 6 assist the City of Lackawanna in the review and approval of the SWPPP.

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION DIVISION OF WATER

SPDES General Permit for Stormwater Discharges from Construction Activity (GP-0-15-002) Stormwater Pollution Prevention Plan Review Checklist

Project Name:		<input checked="" type="checkbox"/> Basic SWPPP (E&SC Plan)	<input type="checkbox"/> Full SWPPP
Site Address:		Watershed:	Date:
Municipality:		Appendix E 303(d) segment:	SPDES General Permit ID Number:
County:		NYR1 _____	
Owner/Operator:		Phone:	Reviewer:
Address:		Fax:	

General Requirements

<u>Yes</u>	<u>No</u>	<u>N/A or N/R</u>	<u>Citation</u>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> SWPPP contains completed final NOI	III.A.1.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> SWPPP identifies potential sources of pollutants in runoff	III.A.2.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> SWPPP identifies Trained Contractor.	III.A.6.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Contractor/Subcontractor certification statements have been signed.	III.A.6.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> SWPPP is signed by responsible corporate officer, general partner, proprietor, principal executive officer, ranking elected official, or duly authorized representative.	VII.H.2.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> MS4 requirements...?	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> OPRHP documentation...?	

Erosion & Sediment Control Requirements

<u>Yes</u>	<u>No</u>	<u>N/A or N/R</u>	<u>Citation</u>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Location, type and size of project are described.	III.B.1.a.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Phasing plan and sequence of operations are described.	III.B.1.d.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> HSG is identified.	III.B.1.c.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> SWPPP identifies contractor/subcontractor responsible for installing, constructing, repairing, replacing, inspecting and maintaining the E&SCs.	III.A.6.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> SWPPP documents selection, design, dimensions, material specifications, installation details, implementation & maintenance of E&SCs, including soil stabilization plans	III.A.1. III.B.1.f. III.B.1.h.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> E&SCs are designed in conformance with the NYS Standards and Specifications for Erosion and Sediment Control; or equivalence to this standard is demonstrated and reason for the alternative is provided.	III.B.1. III.B.1.i.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Maps of general location and site are present showing: Legend, scale, north arrow	III.B.1.b. III.B.1.
		<input type="checkbox"/> total area, all improvements, areas disturbed and not disturbed, existing vegetation, onsite and adjacent offsite surface waters, floodplain/floodway boundaries, wetlands and drainage patterns that could be affected the project.	

SWPPP Review Checklist

Appendix F (continued)

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF WATER

SPDES General Permit for Stormwater Discharges from Construction Activity (GP-0-15-002)
Stormwater Pollution Prevention Plan Review Checklist

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	existing and final contours, locations of soil types & boundaries, material/waste/borrow/equipment storage areas, locations of stormwater discharges, and location/size/length of each E&SC	III.B.1.g.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Location and sizing of any temporary sediment basins or structural practices planned to divert flows from exposed soils are included	III.B.1.h.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Maintenance inspection schedule, in accordance with the NYS Standards & Specs for E&SCs is included	III.B.1.i.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Pollution Prevention measures to control litter, chemicals, debris are described.	III.B.1.j.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Description & location of any industrial stormwater discharges (i.e., concrete, asphalt, etc.) is included	III.B.1.k.

Post-construction Stormwater Management Practices

Yes	No	N/A or N/R	Citation
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	SWPPP is prepared by a Qualified Professional. III.A.3.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	SWPPP identifies contractor/subcontractor responsible for constructing the SMPs. III.A.6.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Design Manual planning process for reducing runoff is employed: <u>Site planning</u> to preserve natural features and reduce impervious cover, <u>Calculation of the WQ</u> for the site, Incorporation of <u>runoff reduction techniques</u> and standard SMPs with Runoff Reduction Volume (RRV) capacity, <u>Determine minimum RRV required</u> , Use of <u>standard SMPs</u> , where applicable, <u>to treat the remaining WQ</u> , not addressed by runoff reduction techniques and standard SMPs with RRV capacity, <u>design of volume and peak rate control practices</u> where required
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	SWPPP documents selection, design, installation, implementation and maintenance of SMPs III.A.1.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	SMPs are designed in conformance with the applicable sizing and performance criteria in the NYS Stormwater Management Design Manual (Jan. 2015); or equivalence to this standard is demonstrated and reason for the alternative is provided. III.B.2.c.vi.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	All SMPs are identified, including dimensions, material specs & installation details. III.B.2.a.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Location & size of SMPs are shown on a site map or construction drawing. III.B.2.b.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	SWPPP includes a <u>Stormwater Modeling and Analysis Report</u> that contains: <u>Predevelopment map</u> w/ watershed/subcatchment boundaries, flow paths & design points, (list further detail per App. G Design Manual?) <u>post-development map</u> showing same plus SMPs, <u>hydrology & hydraulic results</u> for required storm events including supporting calculations, methodology and a summary table comparing pre & post-development runoff rates & volumes for the different storm events, <u>summary table</u> w/ calculations showing that ea. SMP conforms w/ the Design Manual sizing criteria

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF WATER

SPDES General Permit for Stormwater Discharges from Construction Activity (GP-0-15-002)
Stormwater Pollution Prevention Plan Review Checklist

identification of any Design Manual sizing criteria that are not required under the General Permit

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Soil testing results and locations of test pits and borings are included	III.B.2.d.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Infiltration test results are included if needed	III.B.2.e.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	O&M plan, including inspection & maintenance schedules, is included and Identifies the responsible entity	III.B.2.f.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Enhanced Phosphorus Removal Standards sizing criteria are included if required.	III.B.3.

Construction Site Inspection Report Form

N/A to ECSD No. 6.

Appendix G

 Department of Environmental Conservation		NO EXPOSURE CERTIFICATION For High Priority Municipal Facilities in SPDES MS4 General Permit, GP-0-24-001 The completed No Exposure Certification must be documented in the SWMP Plan. <i>Please do not submit this form to the Department unless requested.</i>			
I. Owner/Facility Information					
Owner/Operator Name:					
Mailing Address:		City/State/Zip:			
Contact Name:		Phone No.:			
Facility Name:					
Street Address:		City/State/Zip:			
County:		Latitude:	Longitude:		
II. Exposure Checklist					
Are any of the following materials or activities exposed to precipitation, now or in the foreseeable future? (Please check either "Yes" or "No" in the appropriate box.) If you answer "Yes" to any of these questions (1) through (11), you are not eligible for no exposure.				YES	NO
1	Using, storing or cleaning machinery or equipment, and areas where residuals from using, storing or cleaning machinery or equipment remain and are exposed to stormwater				
2	Materials or residuals on the ground or in stormwater inlets from spills/leaks				
4	Material handling equipment (except adequately maintained vehicles)				
5	Materials or products during loading/unloading or transporting activities				
8	Materials or products stored outdoors (except final products intended for outside use [e.g., new cars] where exposure to stormwater does not result in the discharge of pollutants)				
7	Materials contained in open, deteriorated or leaking storage drums, barrels, tanks, and similar containers				
8	Materials or products handled/stored on roads or railways owned or maintained by the discharger				
9	Waste material (except waste in covered, non-leaking containers [e.g., dumpster])				
III. Certification					
I certify under penalty of law that I have read and understand the eligibility requirements for claiming a condition of "no exposure" and obtaining an exclusion from SPDES stormwater permitting. I certify under penalty of law that there are no discharges of storm water contaminated by exposure to industrial activities or materials from the industrial facility or site identified in this document (except as allowed under 40 CFR 122.26(g)(2)). I understand that I am obligated to submit a no exposure certification form upon request to the NPDES permitting authority or to the operator of the local municipal separate storm sewer system (MS4) into which the facility discharges (where applicable). I understand that I must allow the SPDES permitting authority, or MS4 Operator where the discharge is into the local MS4, to perform inspections to confirm the condition of no exposure and to make such inspection reports publicly available upon request.					
Printed Name:			Title/Position:		
Signature:			Date:		

 Department of Environmental Conservation	Storm Event Data Form for SPDES MS4 General Permit, GP-0-24-001
Do not submit this form to the Department; keep this form with the municipal facility's SWPPP and in the MS4 Operator's SWMP Plan.	
Permit Number:	
N Y R 2 0 A	
Facility Name:	
Contact First Name:	
Contact Last Name:	
Contact Phone:	
Contact Email:	
Storm Event Date:	
Storm Duration (in hours):	
Rainfall Measurement from Storm Event (in inches):	
Date of Last Measurable Storm Event:	
Duration Between Storm Event Sampled and End of Previous Measurable Storm (in hours):	
Certification I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.	
Facility Operator First Name (please print or type)	Facility Operator Last Name (please print or type)
Date	Signature



Department of Environmental Conservation

**Visual
Monitoring Form
MS4 GP-0-24-001**

All high priority municipal facilities covered under the MS4 GP-0-24-001 must perform Visual Monitoring twice a permit term, separated by a minimum of one (1) year. Please see the permit Part VLF/VII.F for additional requirements. This form is part of the facilities records and should be retained onsite with the facility's Stormwater Pollution Prevention Plan. ***Please do not submit this form to the Department.***

MS4 Operator Permit ID Facility Name

Ourfall Number **Examiner's Name** **Examiner's Title**

Qualifying Storm? Runoff Source?

Yes No Rainfall Snowmelt

Date/Time Collected Date/Time Examined

[]	/	[]	/	[]	:	[]	[]	AM	/	[]	PM
-----	---	-----	---	-----	---	-----	-----	----	---	-----	----

1. Does the stormwater appear to be colored? Yes No

If yes, describe

2. Is the stormwater clear or transparent? Yes No

If yes, which of the following best describes the clarity of the stormwater: Clear Milky Opaque

3. Can you see a rainbow sheen effect on the water surface? Yes No

If yes, which best describes the sheen? Rainbow Sheen Floating Oil Globules

4. Does the sample have an odor? _____ Yes No

Visual Monitoring Form

Appendix I (continued)

If yes, describe

5. Is there something floating on the surface of the sample? Yes No

If yes, describe

6. Is there something suspended in the water column of the sample? Yes No

If yes, describe

7. Is there something settled on the bottom of the sample? Yes No

If yes, describe

8. Is there foam or material forming on the top of the sample surface? Yes No

If yes, describe

Detail any concerns, corrective actions taken and any other indicators of pollution present in the sample:

Municipal Facility Assessment Form

Appendix J

 NEW YORK STATE	Department of Environmental Conservation	Municipal Facility Assessment Form For SPDES MS4 General Permit, GP-0-24-001	
Assessments must be conducted by a person with the knowledge and skills to assess conditions and activities that could impact stormwater quality at the facility and evaluate the effectiveness of best management practices required by the SPDES MS4 General Permit (GP-0-24-001).			
MS4 Permit ID:	MS4 Operator Name:		
Facility Name:	Facility Type:	Date:	
Weather Conditions:			
Is stormwater runoff present during this assessment? <input type="checkbox"/> Yes <input type="checkbox"/> No			
Comments:			

<u>General</u>		<u>Yes</u>	<u>No</u>
1	Is this a high priority municipal facility?	<input type="checkbox"/>	<input type="checkbox"/>
2	If this is a high priority municipal facility, does the facility qualify for a No Exposure Certification?	<input type="checkbox"/>	<input type="checkbox"/>
3	If this is a high priority municipal facility, is there a completed SWPPP available?	<input type="checkbox"/>	<input type="checkbox"/>
4	Does the facility have any MS4 outfalls?	<input type="checkbox"/>	<input type="checkbox"/>
5	Does the facility have any Interconnections?	<input type="checkbox"/>	<input type="checkbox"/>
6	Does the facility have any municipal facility Intraconnections?	<input type="checkbox"/>	<input type="checkbox"/>
Comments:			
<u>Good Housekeeping</u>		<u>Yes</u>	<u>No</u>
7	Are paved surfaces free of trash, sediment, and/or debris?	<input type="checkbox"/>	<input type="checkbox"/>
8	Date the paved area was last swept or vacuumed.	<input type="checkbox"/>	<input type="checkbox"/>
9	Do outdoor waste receptacles have covers?	<input type="checkbox"/>	<input type="checkbox"/>
10	Are the waste receptacles emptied on a regular basis?	<input type="checkbox"/>	<input type="checkbox"/>
11	Are there signs of leaks, contaminants or overfilling at the waste receptacle area?	<input type="checkbox"/>	<input type="checkbox"/>
12	Are the following facility areas free of accumulated trash, sediment, debris, contaminants, and spills: - Salt storage areas - Container storage areas - Maintenance areas	<input type="checkbox"/>	<input type="checkbox"/>

Municipal Facility Assessment Form

Appendix J (continued)

	- Staging areas	<input type="checkbox"/>	<input type="checkbox"/>	
	- Material stockpile areas	<input type="checkbox"/>	<input type="checkbox"/>	
Comments:				
Vehicle and Equipment Areas		<input type="checkbox"/> N/A	Yes	No
13	Are vehicle/equipment parked indoors or under a roof?	<input type="checkbox"/>	<input type="checkbox"/>	
14	Are vehicles/equipment washed in only designated areas?	<input type="checkbox"/>	<input type="checkbox"/>	
15	Are vehicles washed regularly to remove contamination and prevent them from polluting stormwater?	<input type="checkbox"/>	<input type="checkbox"/>	
16	Is all wash water treated in an oil water separator prior to discharge?	<input type="checkbox"/>	<input type="checkbox"/>	
17	Is all wash water managed so it does not enter the MS4?	<input type="checkbox"/>	<input type="checkbox"/>	
Comments:				
Vehicle/Equipment Maintenance		<input type="checkbox"/> N/A	Yes	No
18	Is equipment stored under shelter or elevated and covered?	<input type="checkbox"/>	<input type="checkbox"/>	
19	Are fluids drained over a drip pan or pad?	<input type="checkbox"/>	<input type="checkbox"/>	
20	Are funnels or pumps used when transferring fluids?	<input type="checkbox"/>	<input type="checkbox"/>	
21	Are waste rags and used absorbent pads disposed of properly?	<input type="checkbox"/>	<input type="checkbox"/>	
22	Are any vehicles and/or equipment leaking fluids?	<input type="checkbox"/>	<input type="checkbox"/>	
23	Are drip pans immediately placed under leaks?	<input type="checkbox"/>	<input type="checkbox"/>	
24	Are materials, equipment, and activities located so that leaks are contained in existing containment and diversion systems (confine the storage of leaky or leak-prone vehicles and equipment awaiting maintenance to protected areas)?	<input type="checkbox"/>	<input type="checkbox"/>	
25	Are vehicles inspected daily for leaks?	<input type="checkbox"/>	<input type="checkbox"/>	
Comments:				
Fueling areas		<input type="checkbox"/> N/A	Yes	No
26	Is fueling performed under a canopy or roof?	<input type="checkbox"/>	<input type="checkbox"/>	
27	Are spill cleanup materials available at the fueling area?	<input type="checkbox"/>	<input type="checkbox"/>	
28	Are breakaway valves used on fueling hoses?	<input type="checkbox"/>	<input type="checkbox"/>	
29	Is the fueling handle lock disconnected so the operator must attend the fueling?	<input type="checkbox"/>	<input type="checkbox"/>	
30	Is stormwater runoff from fueling area treated in an oil/water separator?	<input type="checkbox"/>	<input type="checkbox"/>	
31	Is the fueling automatic stop inspected regularly to ensure it is working properly?	<input type="checkbox"/>	<input type="checkbox"/>	
32	Are all fuel deliveries monitored?	<input type="checkbox"/>	<input type="checkbox"/>	
Comments:				

Municipal Facility Assessment Form**Appendix J (continued)**

Salt Storage Piles or Pile Containing Salt				
		<input type="checkbox"/> <u>N/A</u>	Yes	No
33	Is salt stored in a salt storage building or under a roof?	<input type="checkbox"/>	<input type="checkbox"/>	
34	Are controls in place to minimize spills while adding or removing material from the pile?	<input type="checkbox"/>	<input type="checkbox"/>	
35	Are salt spills cleaned up promptly?	<input type="checkbox"/>	<input type="checkbox"/>	
36	Is overflow and tracked salt removed promptly from loading areas?	<input type="checkbox"/>	<input type="checkbox"/>	
37	Is stormwater draining away from the salt pile directed to a vegetated filter area	<input type="checkbox"/>	<input type="checkbox"/>	
Comments:				
Fluids Management				
		<input type="checkbox"/> <u>N/A</u>	Yes	No
38	Are all drums and containers of fluids stored with proper cover and containment?	<input type="checkbox"/>	<input type="checkbox"/>	
39	Are fluids stored in appropriate containers and/or storage cabinets?	<input type="checkbox"/>	<input type="checkbox"/>	
40	Are all fluids kept in original containers or labeled in a manner that describes the contents adequately?	<input type="checkbox"/>	<input type="checkbox"/>	
41	Are Material Safety Data Sheets (MSDS/SDS) readily available?	<input type="checkbox"/>	<input type="checkbox"/>	
42	Are all containers that are stored free of leaks or deposits?	<input type="checkbox"/>	<input type="checkbox"/>	
43	Are containers of product inspected regularly?	<input type="checkbox"/>	<input type="checkbox"/>	
44	Is used oil and antifreeze stored indoors and/or on spill containment pallets?	<input type="checkbox"/>	<input type="checkbox"/>	
45	Is used oil and antifreeze properly disposed of or recycled?	<input type="checkbox"/>	<input type="checkbox"/>	
Comments:				
Lead Acid Batteries				
		<input type="checkbox"/> <u>N/A</u>	Yes	No
46	Are lead-acid batteries stored indoors on spill containment pallets or in bins?	<input type="checkbox"/>	<input type="checkbox"/>	
47	Are intact batteries stored on an acid-resistant rack or tub?	<input type="checkbox"/>	<input type="checkbox"/>	
48	Are cracked or leaking batteries stored in labeled, closed, leak-proof containers?	<input type="checkbox"/>	<input type="checkbox"/>	
49	Is the date each battery was placed in storage recorded?	<input type="checkbox"/>	<input type="checkbox"/>	
50	Are batteries stacked more than 5 high?	<input type="checkbox"/>	<input type="checkbox"/>	
51	Are batteries inspected regularly for leaks?	<input type="checkbox"/>	<input type="checkbox"/>	
Comments:				
Spill Prevention and Response Procedures				
		<input type="checkbox"/> <u>N/A</u>	Yes	No
52	Are vehicles inspected daily for leaks?	<input type="checkbox"/>	<input type="checkbox"/>	

Municipal Facility Assessment Form**Appendix J (continued)**

53	Is spill control equipment and absorbents readily available?	<input type="checkbox"/>	<input type="checkbox"/>	
54	Are emergency phone numbers posted in conspicuous areas?	<input type="checkbox"/>	<input type="checkbox"/>	
55	Are spills contained and cleaned up immediately?	<input type="checkbox"/>	<input type="checkbox"/>	
Comments:				
General Material Storage Areas		<input type="checkbox"/> <u>N/A</u>	Yes	No
56	Are leaking or damaged materials stored inside a building or another type of storm resistance shelter?	<input type="checkbox"/>	<input type="checkbox"/>	
57	Are all material stockpiles within containment structures (e.g., concrete barriers, earthen berms) or stored in a manner that does not allow discharge of impacted stormwater?	<input type="checkbox"/>	<input type="checkbox"/>	
58	Are used fuel tanks and other scrap metal and parts drained of fluids and stored under cover?	<input type="checkbox"/>	<input type="checkbox"/>	
59	Are outdoor containers covered?	<input type="checkbox"/>	<input type="checkbox"/>	
60	Are piles of spills, asphalt, debris, etc. stored under a roof or cover?	<input type="checkbox"/>	<input type="checkbox"/>	
61	Are spills of material or debris cleaned up promptly?	<input type="checkbox"/>	<input type="checkbox"/>	
62	Are used tire storage piles placed away from storm drains or conveyances?	<input type="checkbox"/>	<input type="checkbox"/>	
63	Are tires recycled frequently to keep the number of stored tires manageable?	<input type="checkbox"/>	<input type="checkbox"/>	
Comments:				
Stormwater Management		Yes	No	
64	Are employees trained on the municipal facility procedures?	<input type="checkbox"/>	<input type="checkbox"/>	
66	Are BMPs and treatment structures working as designed?	<input type="checkbox"/>	<input type="checkbox"/>	
67	Are BMPs and treatment structures free from debris buildup or overgrown vegetation that may impair function?	<input type="checkbox"/>	<input type="checkbox"/>	
68	Catch basins should be cleaned in accordance with the timeframes listed in Part VI.F.3.c.II. / Part VII.F.3.c.II, depending on the MS4 Operator type. Based on this, do any catch basins need to be cleaned?	<input type="checkbox"/>	<input type="checkbox"/>	
69	Are berms, curbing or other methods used to divert and direct discharges adequate and in good condition?	<input type="checkbox"/>	<input type="checkbox"/>	
70	Are rooftop drains directed to areas away from pavement?	<input type="checkbox"/>	<input type="checkbox"/>	
Comments:				
Erosion and Sediment Controls		Yes	No	
71	Are soil stabilization measures (e.g., seed and mulch, rolled erosion control products) considered in areas that have the potential for significant soil erosion?	<input type="checkbox"/>	<input type="checkbox"/>	
72	Are natural buffers maintained around surface waters?	<input type="checkbox"/>	<input type="checkbox"/>	
73	Are flow velocity dissipation devices in place at monitoring locations and channel outlets (rock riprap, stone check dams, concrete baffles)?	<input type="checkbox"/>	<input type="checkbox"/>	
74	Do controls conform to the NYS Standards and Specifications for Erosion and Sediment Control (2016), or equivalent?	<input type="checkbox"/>	<input type="checkbox"/>	

Municipal Facility Assessment Form**Appendix J (continued)**

Comments:	
Corrective Actions and Comment	
Describe Inspection findings and if necessary, the corrective actions taken	
Inspector Signature	Date:

MS4 Notice of Intent

version 1.2

(Submission #: HQ0-D7MK-TA73Q, version 2)

Details

Originally Started By mutasem salah

Alternate Identifier NYR20A069

Submission ID HQ0-D7MK-TA73Q

Status Draft

Form Input

MS4 Operator Information

Is this NOI for an MS4 Operator continuing coverage?

Yes

Permit ID #:

NYR20A069

MS4 Operator Type

Traditional non-land use control

Traditional Non-Land Use or Non-Traditional

Traditional non-land use and non-traditional MS4 Operator requirements are found in Part VII of the MS4 General Permit.

Municipality Name or Legal Entity Name

Erie County Sewer District No. 6

Legal Municipal/Entity Mailing address

95 franklin st - Room 1034

buffalo, New York 14202

Erie

Ranking Official

Official Title	First and Last Name	Phone	Email
Other: Deputy Commissioner	Joseph L. Fiegl	7168588383	joseph.fiegl@erie.gov

NOI Preparer

NOI Preparer Title	First and Last Name	Phone	Email
Stormwater Program Coordinator	Mutasem Salah	7168588383	mutasem.salah@erie.gov

NAICS Codes

Federal, State or Local Government - 924110
Military Bases - 928110
Highway, road or other thoroughfare system - 237310
Large Hospitals - 622110
Public Colleges and Universities - 611310
Correctional Institutions - 922140
[NAICS Code Lookup](#)

NAICS Code

924110

Is the MS4 Operator working with other MS4 Operators to implement the Stormwater Management Program?

Yes

Does the MS4 Operator have any facilities that need to obtain MSGP coverage under MSGP permit?

No

MS4 Location Information**MS4 Facility Name**

Erie County Sewer District No. 6 - MS4

On the map below, place the pin at the center of the MS4 Operator. This can be either the geographic center or the population center.

Central point of the MS4 Operator

42.8191764900699,-78.82588893118343

Waterbody Information (1 of 2)

If the MS4 Operator discharges to multiple waterbodies, all waterbodies must be listed. Use the 'Duplicate Waterbody Information' or 'Add New Waterbody Information' buttons to add as many waterbodies as necessary.

To find the names of waterbodies, including any impaired waterbodies, use the DEC's Stormwater Interactive Map. Under the Permit Related Layers check the box for the Impaired Waterbodies for MS4GP and the box for Waterbody Inventory/Priority Waterbodies List.

[Stormwater Interactive Map](#)

Waterbody name and segment receiving MS4 Operator discharges

South Branch Smoke Cr, Lower, and trib - 0101-0036

Is this waterbody segment listed in Appendix C (List of Impaired Waters) of the MS4 General Permit?

Yes

An MS4 discharging to a waterbody listed in Appendix C must meet the requirements of Part VIII. for the pollutant(s) of concern listed in Appendix C.

For which pollutant(s) of concern is the waterbody impaired?

Phosphorus

Silt/Sediment

Is this waterbody segment listed in Table 3 (Approved TMDL Watersheds with MS4 Contribution) of the MS4 General Permit?

No

Waterbody Information (2 of 2)

If the MS4 Operator discharges to multiple waterbodies, all waterbodies must be listed. Use the 'Duplicate Waterbody Information' or 'Add New Waterbody Information' buttons to add as many waterbodies as necessary.

To find the names of waterbodies, including any impaired waterbodies, use the DEC's Stormwater Interactive Map. Under the Permit Related Layers check the box for the Impaired Waterbodies for MS4GP and the box for Waterbody Inventory/Priority Waterbodies List.

[Stormwater Interactive Map](#)

Waterbody name and segment receiving MS4 Operator discharges

Smoke Creek, Upper, and trib - 0101-0035

Is this waterbody segment listed in Appendix C (List of Impaired Waters) of the MS4 General Permit?

No

Is this waterbody segment listed in Table 3 (Approved TMDL Watersheds with MS4 Contribution) of the MS4 General Permit?

No

CERTIFICATION

The MS4 Operator has read and understands the SPDES MS4 General Permit, GP-0-24-001, as it pertains to permit requirements as well as the timeframes for compliance set forth in the permit.

Yes

I am the ranking elected official or Principal Executive Officer for the MS4 Operator and will be signing the form electronically.

No

Attach completed certification form.

[CERT.pdf - 03/13/2024 01:52 PM](#)

Comment

NONE PROVIDED

Attachments

Date	Attachment Name	Context	User
3/13/2024 1:52 PM	CERT.pdf	Attachment	mutasem salah
3/1/2024 12:10 PM	MS4 eNOI Acknowledgement.pdf	Generated Document	Christina Chiappetta

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Division of Water
625 Broadway, Albany, New York 12233-3500
P: (518) 402-8233 | F: (518) 402-9029
www.dec.ny.gov

MS4 Operator Certification Form for eReports

**SPDES General Permit for
Stormwater Discharges From
Municipal Separate Storm Sewer Systems (GP-0-24-001)**

Instructions

Please review Part X.J. of GP-0-24-001 before signing this form. A signature by an unauthorized person will delay permit coverage.

This form must be signed by one of the following:

1. For a corporation: by a responsible corporate officer
2. For a partnership: by a general partner
3. For a sole proprietorship: by the proprietor
4. For a municipality, state, federal or other public agency: by a principal executive officer or ranking elected official

Erie County Sewer District No. 6
MS4 Operator Name: _____

eReport Submission Number: **HQ0-D7MK-TA73Q** _____

MS4 Operator Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Joseph L. Fiegl

Name (please print or type)


Signature

Deputy Commissi

Title

Erie County-DSM

Organization

03/13/2024

Date



Staffing Plan/Organizational Chart

Appendix L

Six Minimum Control Measures (MCM) As they may be applicable.					
ECSD No. 6					
Responsible for Implementation of the					
MCM 1	MCM 2	MCM 3	MCM 4	MCM 5	MCM 6
PUBLIC EDUCATION	WNYSC - The Coalition creates graphics and designs presentations. Prepares postcards and mailers. Creates K-12 Education	WNYSC schedules 2 public meetings a year to educate key individuals and groups	ILLOIT DISCHARGE DETECTION AND ELIMINATION	CONSTRUCTION SITES	POST CONSTRUCTION MANAGEMENT
WNYSC -	WNYSC	GIS	IT Group - Performs mapping functions. Assists and trains individuals using GPS.	N/A to ECSD No. 6 However, once the SWPPP is approved, Developer is required to contact the City of Lackawanna	ECSD No. 6 Implements best management practices for operational and capital improvements. Staff is trained annually.
Organizes a stormwater conference once in 2 years, Invites Guest speakers, Engineering Consultants, Landscape Architects and MS4 communities.	ECSD No. 6 along with WNYSC organises a household hazardous waste collection day. This event is published in the newspaper and residents from all communities are encouraged to attend	District - Inspects outfalls, and field reconnaissance associated with regular inspections and potential illicit discharge violations. Works on staff training, performs inspections and issues notice of violations	District - Inspects outfalls, and field reconnaissance associated with regular inspections and potential illicit discharge violations. Works on staff training, performs inspections and issues notice of violations	District receives calls from Residents, Code Enforcement Officers, and the public regarding illicit discharges into storm sewers. The complaints are investigated and necessary track down and violations are initiated.	Lackawanna Water Resource Recovery Facility is covered under the Multi-Sector SPDES Permit.
Makes presentations to educate MS4 Communities and City/Town Boards when needed. Maintains a website related to stormwater management	ECSD No. 6 participates in different Environmental groups that have interest in the stormwater management program. These local groups assist with public education and involvement.	ECSD No. 6 staff maintains all publicly owned pumping stations in Lackawanna.			

Guide to Utilizing the Online Stormwater Mapper

WNY Stormwater Coalition

PURPOSE:

This web application was created using ArcGIS enterprise to provide the WNY Stormwater Coalition members with a method for viewing all of their stormwater conveyance data in an online interactive map.

Online mapper Link:

<https://erieny.maps.arcgis.com/apps/webappviewer/index.html?id=717984bd03e74f23b0296461e3ea9957>

After clicking the above link, you are prompt for an ArcGIS Login to sign into Erie County.

Login Credentials:

Username: WNY_Storm
Password: \$tormW@ter20

Recommended Web Browsers:

- Google Chrome
- Internet Explorer
- iOS Safari



Sign in to Erie County, New York 

with

ArcGIS login

 WNY_Storm



Keep me signed in

Sign In

[Forgot username?](#) or [Forgot password?](#)

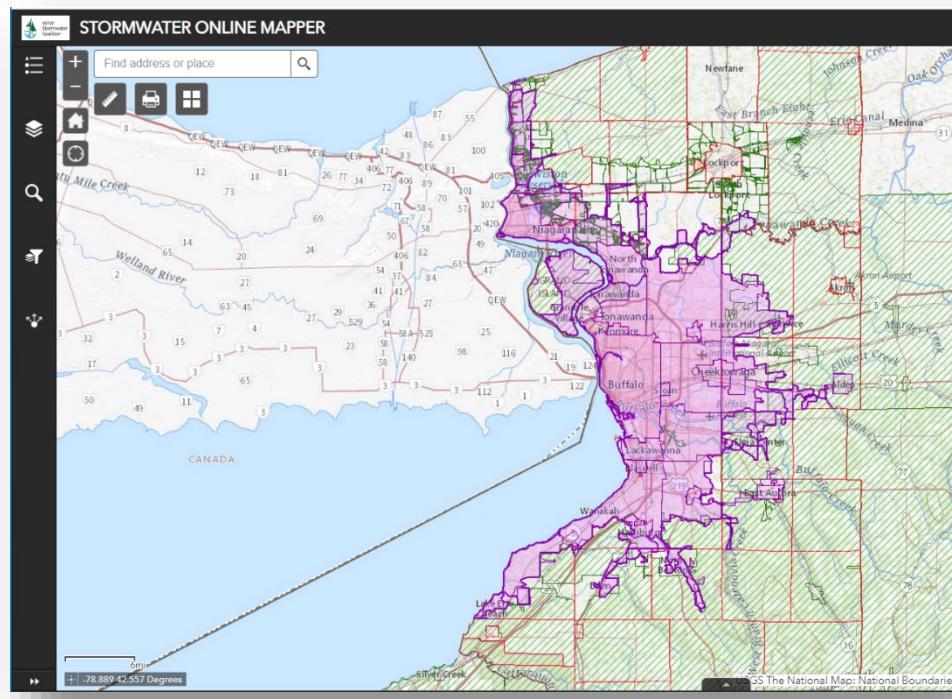
Not a member of this organization?
[Sign in to your account on ArcGIS Online](#)

[Privacy](#)

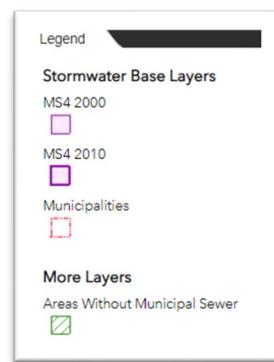
LEGEND:



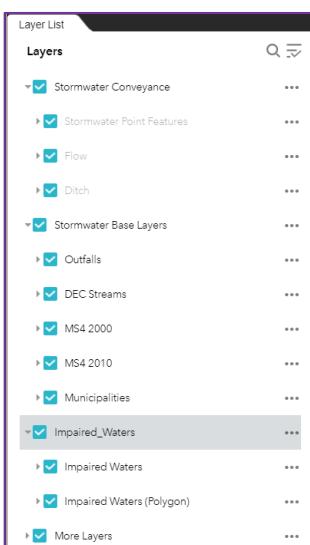
Upon opening the mapper, layers automatically turn on. As you zoom in more layers become visible. To view the legend click the icon above, located in the upper left corner of the mapper.



The Legend is dynamic and will change to show you which layers are active as you zoom in and out of the map. At the default scale you see MS4 boundaries (2000,2010), Municipalities and Areas Without Municipal Sewer are the active layers.



LAYER LIST:



The layer list is located to the right of the legend in the upper left portion of the mapper. The layer list is also dynamic, similar to the legend. Data layers that are not visible at certain scales appear greyed out. The image on the left shows that *Stormwater Point Features, Flow and Ditch* layers appearing grey. These layers will only turn on at a larger scale as they are not clearly visible at smaller scales. You can also turn on/off any layers you choose by simply checking the blue box. Notice the three little dots next to each layer.



When you click the three little dots a menu appears:

Zoom to	<i>Zoom to:</i> Zooms to the scale of the entire layer
Transparency	<i>Transparency:</i> Allows you to adjust the transparency of the layer
Set visibility range	<i>Visibility Range:</i> Lets you turn on/off layers at range of scales
Enable pop-up	<i>Enable Pop-up:</i> Lets you turn on/off pop capability on a layer
Move up	<i>Move Up/Down:</i> Will move a layer up or down in ranking in the TOC
Move down	
View in Attribute Table	<i>View in Attribute Table:</i> Pulls up attribute table for the feature
Show item details	

Stormwater Point Features		Flow	Ditch	Outfalls	DEC Streams
<input style="border: none; padding: 0; margin: 0;" type="button" value="Options"/> Filter by map extent Zoom to Clear selection C					
MUNIID	OUTOWNER	OUTID	PIPSIZEIN		
WS362	Town of West Seneca	Interconnect	12		
EC1312	Erie County - Aurora District	Outfall	18		

Show Item Details: Takes you to the item detail page on ArcGIS online

SEARCH BY OUTFALL **ID:**

The search widget is in the upper-left hand portion of the mapper next to the layer list icon. Once clicked the widget panel drop downs on the left side and a small search box appears next to the search symbol.



The search box gives you results as you begin to type the outfall ID.



MUNICIPAL



FILTER:

Municipal Filter

Filter Outfalls and Stormwater Features by Municipality

Choose filter type

Outfalls and Stormwater Conveyance by Municipality

Choose a municipality then click Apply

Town of Evans

Apply Reset

- This widget allows you to apply a filter to all of the stormwater conveyance and outfall data based on municipality.
- Once you select a municipality, click *Apply*. It will zoom to that municipality and the only data showing on the map will be for that particular municipality.
- Depending on the size of the municipality, you may need to zoom in further to see the stormwater data.
- Notice in the attribute table pull up, the only data available is the selected municipality

Stormwater Point Features Flow Ditch Outfalls DEC Streams MS4 2000 MS4 2010 Municipalities Impaired Waters Impaired Waters (Polygon) Areas Without Municipal Sewer

Options Filter by map extent Zoom to Clear selection Refresh

TYPE	MUNICIPALITY	CONDITION	BMP	CONSTRUC	EP_POSIT	EP_INVERT	EP_DIAM	EP_COMP	EP_BMP	IP1_POSIT	IP1_INVERT	IP1_DI
CB	Town of Evans	Fair	None	Precast	NW	27.00	8	HDPE		SE	26.00	8
CB	Town of Evans	Fair	None	Precast	NW	42.00	12	Concrete		SE	40.00	12
CB	Town of Evans	Clean me	None	Precast		0.00					0.00	
CB	Town of Evans	Good	None	Precast	N	30.50	18	HDPE		W	30.50	18
CB	Town of Evans	Good	None	Precast	W	18.00	10	CMP		E	19.00	6
CB	Town of Evans	Good	None	Precast	N	42.50	12	HDPE		E	42.50	10
CB	Town of Evans	Good	None	Precast	NE	23.75	8	HDPE		SW	22.50	8
CB	Town of Evans	Clean me	None	Precast	W	26.00	8	HDPE		E	25.00	8

110 features 0 selected

OTHER WIDGETS:

Notice a few other remaining widgets on the inside portion of the mapper.

Basic Zoom Function: You can use these buttons to zoom. You can also use your mouse capability to scroll in/out to zoom throughout the mapper. Double-clicking any area on the map will also do a partial zoom-in.



Home Button:

The home button takes you to the default extent of the map.



My Location: A circular icon with a dot and a line.

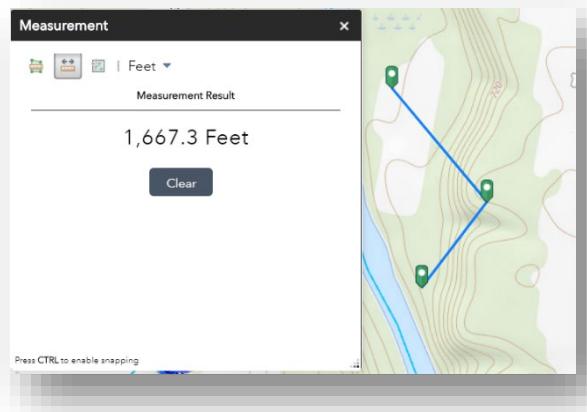
The button uses your device's location when you have it enabled. This is particularly helpful if using the mapper in the field.



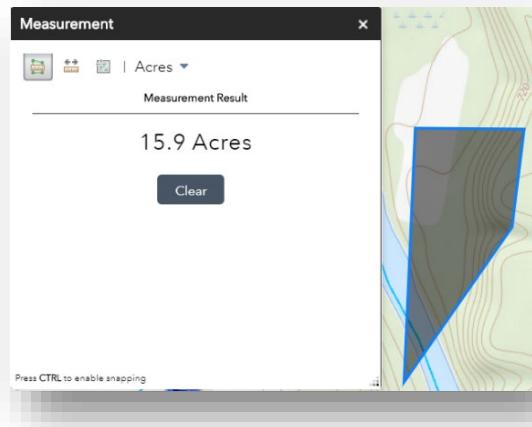
Measurement:

Allows you to measure Area, Distance and can give you a precise location.

To measure distance, select the middle icon and then single click your starting point and as many points in between your last point. To end your segment, double-click on the last point in your measurement. You can change your measure type from feet to miles etc. in the drop down list.

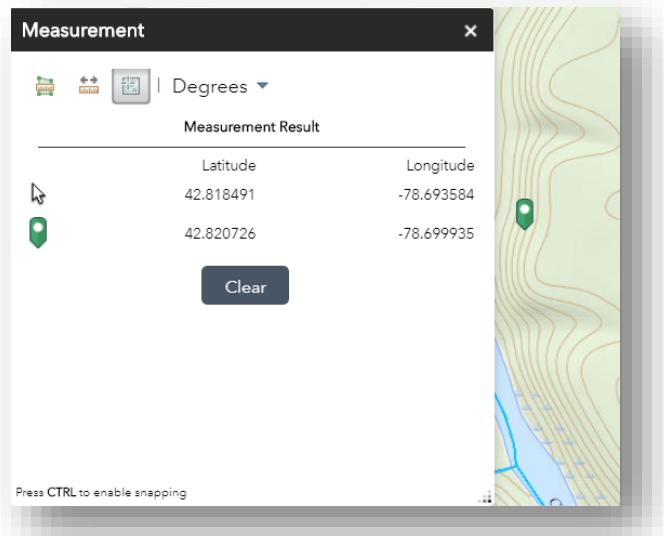


To measure area use the icon on the far left. Single click to begin drawing your polygon, and double-click to finish it. Use the measurement type dropdown to change your area measurement unit.



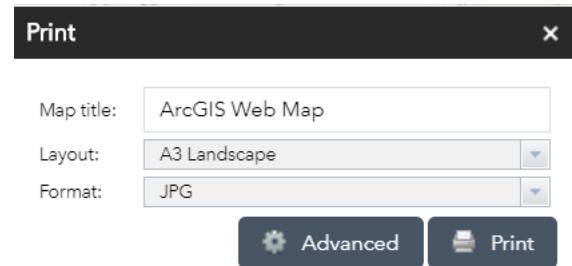
To capture the precise location of a point select the third icon to the right. It will take the location of your mouse at all times, and then also allow you to click a point on the map to give you precise location in longitude/latitude base on either Decimal Degrees, or Degree, Minutes, Seconds. (use drop-down)

***For all three measurements, you can use **CTRL** (on your keyboard) to enable snapping to features in the map such as manholes, pipes, ditches, outfalls etc. This makes tracing polygons very easy.**



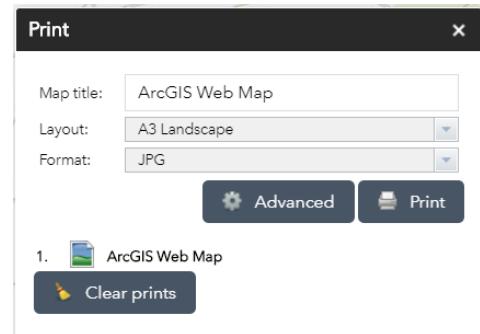
Printing Widget:

The print widget lets you export the map to various file types to be saved or printed. The current view of the map generates when you click print. The default layout is “A3 Landscape” and default format is JPG. You have the option to select different types in the drop down. You can title your map.

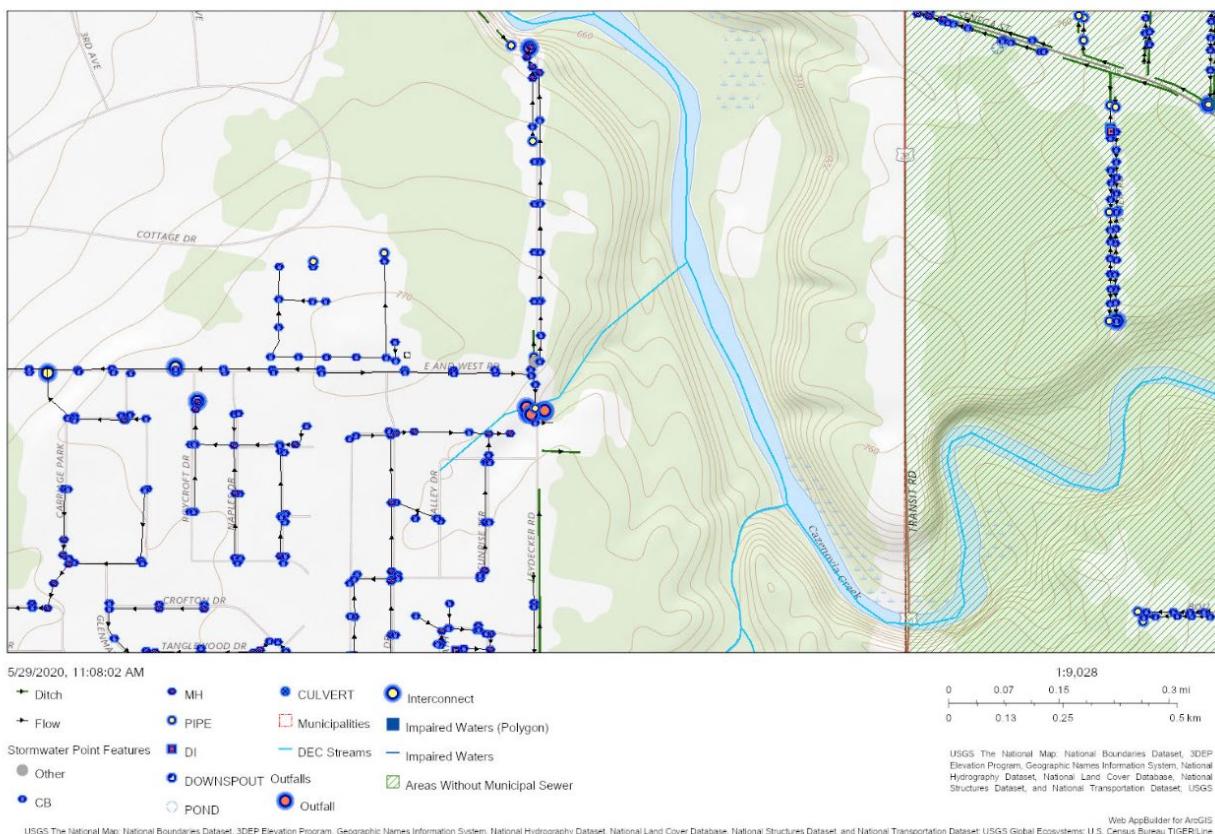


A file is generated after clicking print. To view the file click on the file name. It will open the map in another tab in your browser.

Below is an example of a JPG map generated from the widget

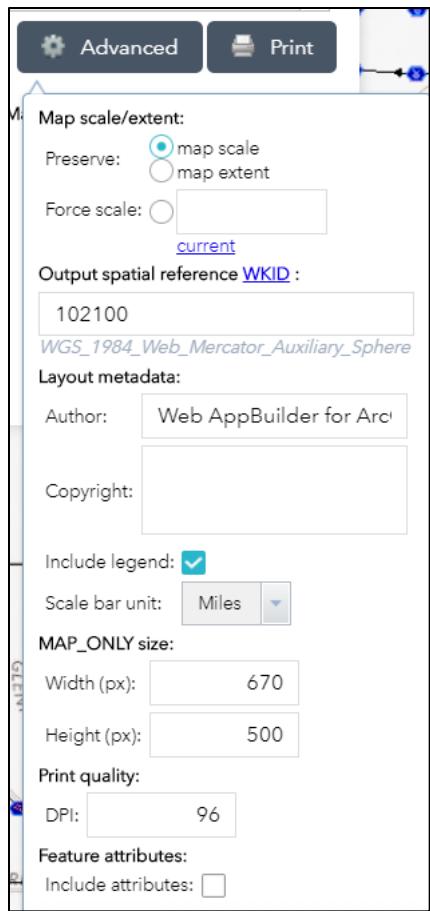


ArcGIS Web Map



Notice that all of the active layers in your current map view are included in the legend at the bottom of the map. Also included are map data references, a scale, and the title of the map.

To start over the print process, select *Clear Prints* button.



The *Advanced* print button lets the user:

- Adjust the map scale/extent
- Edit the spatial reference
- Add an author and copyright to the map
- Option to include the legend
- Change the unit used for the scale bar
- Edit the size of the map portion of the print
- Change the DPI of the file output
- Option to include attributes in the map

Basemap



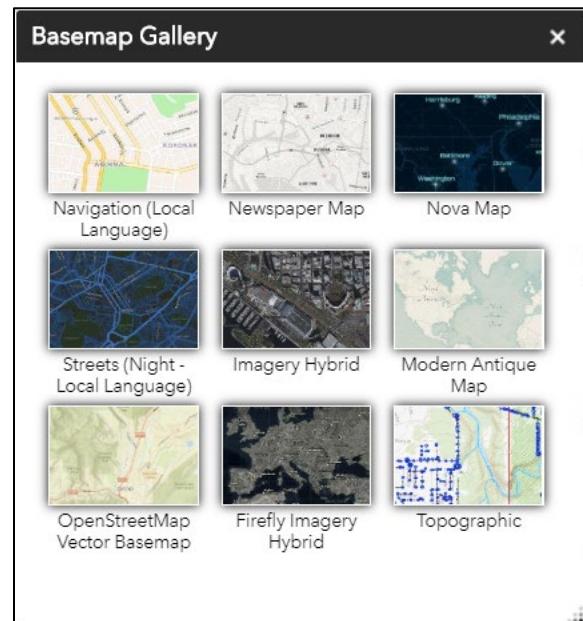
Gallery:

This lets the user change active basemap used in the mapper. The default basemap is called 'Topographic'

Depending on how you're using the mapper, other basemaps might be more useful than others.

Full Screen: 

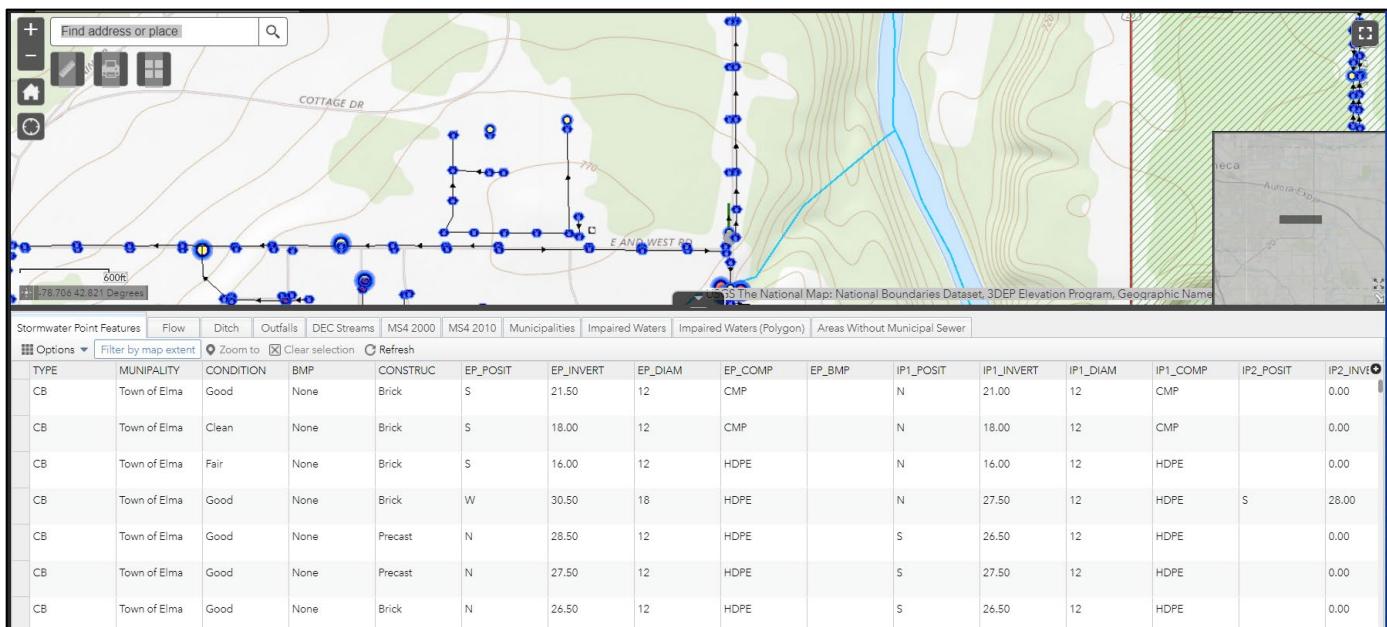
This button will set the mapper to fill your entire screen rather than just within your browser.



The Attribute Table:

The attribute table can be pulled up from the bottom of the map screen at any time. All layers that contain attributes can be found in the is table. Each layer has its own tab. By default 'Filter by map extent' is checked. This means that you can only see attributes for features that are currently displayed in the map. Feel free to uncheck this setting, but it may slow down your mapper due to the large amounts of data stored in each layer.

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Resolution: Local Laws

Appendix N

See Rules and Regulations for Erie County Sewer District No. 6 Municipal Separate Storm Sewer System (MS4)

Adopted: December 10, 2002

Amended: October 11, 2007

Enforcement Response Plan

Appendix O

The Enforcement Response Plan (ERP) describes the action to be taken for violations pertaining to MCM 3: Illicit Discharge Detection and Elimination, (MCM 4: Construction Site Stormwater Runoff Control, and MCM 5: Post-Construction Stormwater are the responsibility of the City of Lackawanna). The ERP provides a protocol to address repeat and continuing violations through progressively stricter responses (i.e., escalation of enforcement) as needed to achieve compliance with the terms and conditions of the MS4 General Permit (GP-0-24-001). Enforcement responses are based on the type, magnitude, and duration of the violation, effect of the violation on the receiving water, compliance history of the violator, and good faith of the violator in compliance efforts. See subsequent pages for specific illicit discharge practice enforcement responses.

Efforts to obtain a voluntary correction of deficiencies through informal enforcement, such as verbal warnings or written notices, must not exceed sixty (60) days in duration from the time of initial determination of the violation until a return to compliance.

The **ECSD No. 6** will use the following types of enforcement responses or combination of responses for illicit discharge violations:

- i. Verbal warnings;
- ii. Written notices;
- iii. Citations (and associated fines);
- iv. Additional measures, supported in the R&R.

Enforcement Tracking

The **ECSD No. 6** documents instances of non-compliance in this SWMP Plan. The enforcement case documentation includes, at a minimum, the following:

- a. Name of the owner/operator of the facility or site of the violation (can be redacted from the publicly available SWMP Plan);
- b. Location of the *stormwater* source (e.g., construction project);
- c. Description of the violation;
- d. Schedule for returning to compliance;
- e. Description of enforcement response used, including escalated responses if repeat violations occur or violations are not resolved in a timely manner;
- f. Accompanying documentation of enforcement response (e.g., notices of noncompliance, notices of violations);
- g. Any referrals to different departments or agencies; and
- h. Date violation was resolved.

All documentation pertaining to Enforcement Response is considered part of this SWMP Plan and is available upon request: contact Stormwater Program Coordinator.

**Enforcement Response Plan:
Illicit Discharge Detection and Elimination**

Appendix O (continued)

Enforcement Response Plan: Illicit Discharge Detection and Elimination		
Violation	Issue	Minimum Response
Unauthorized discharge to MS4	i) Any direct or indirect non-stormwater discharge to the MS4 ii) Failure to eliminate discharge/cease practice or implement BMPs in accordance with schedule: violation continued for 30 or more days after notice iii) Failure to eliminate discharge/cease practice or implement BMPs in accordance with schedule: violation continued for 60 or more days after notice	i) Warning letter with schedule for correction/implementation of BMPs (NOV Optional) ii) NOV iii) Formal Enforcement/Fines
Unauthorized/Illicit Connection to MS4	i) Any drain or conveyance, whether on the surface or subsurface, which allows an illegal discharge to enter the MS4 ii) Failure to eliminate illicit connection to the MS4 in accordance with schedule: violation continued for 30 or more days after notice iii) Failure to eliminate illicit connection to the MS4 in accordance with schedule: violation continued for 60 or more days after notice	i) Warning letter with schedule for correction/implementation of BMPs (NOV Optional) ii) NOV iii) Formal Enforcement/Fines

Enforcement Response Plan:

Appendix O (continued)

Construction General Permit

N/A to ECSD No. 6.

Post-Construction Stormwater Management Practice Inspection & Maintenance

N/A to ECSD No. 6.

Part VIII: Enhanced Requirements for Impaired Waters

Appendix P

As listed in Appendix B of the MS4 General Permit (GP-0-24-001), **South Branch Smoke Cr, Lower, and trib (0101-0036)** is within the bounds of ECSD No. 6. The two POC are **Phosphorus and Silt/Sediment**. Therefore, ECSD No. 6 is subject to Enhanced Requirements for Impaired Waters.

The ECSD No. 6 Rules and Regulations (R&R) for MS4 Prohibit Illicit Discharges, Activities and Connections to Separate Storm Sewer System, and for Stormwater Management and Erosion & Sediment Control, help to reduce the two POC. In the event one of the two pollutant is found to be discharged into South Branch Smokes Creek, whether detected by sampling or visually, the R&R has the enforcement mechanism necessary to track and eliminate and/or reduce the source.

To implement the enhanced requirements the following must be completed for both POC (phosphorus and silt/sediment):

Within 3 years

1. Mapping

- a. Update GIS to include infrastructure for each MS4 outfalls and ADA MS4 outfalls.
- b. For each outfall identify
 - i. Retail and wholesale plant nurseries (including big box stores);
 - ii. Commercial lawn care facilities; and
 - iii. Golf courses.

2. Public Education and Outreach

- a. Within six (6) months, ECSD No. 6 will make available information on how the impairment is being addressed.

Document the completion of this requirement in the *SWMP Plan*.

- b. Twice a year, once from **March to August** and once from **September to February**, ECSD No. 6 will provide educational messages with information specific to phosphorus and silt/sediment to the target audiences within the *sewer shed of South Branch Smokes Creek*.

Document the completion of this requirement in the *SWMP Plan*.

3. Public Involvement/Participation

No additional requirements.

4. Illicit Discharge Detection and Elimination

within five (5) years, for both POC (phosphorus and silt/sediment), ECSD No. 6 will include on the *MS4 outfall* inventory for each outfall as follows:

ID;

Prioritization

Type of monitoring location

Receiving waterbody name and class

Receiving waterbody WI/PWL Segment ID

Land use in drainage area;

Type of conveyance (open drainage or closed pipe);

Material;

Shape;

Dimensions;

Submerged in water; and

Submerged in sediment.

Part VIII: Enhanced Requirements for Impaired Waters Appendix P (continued)

5. Construction Site Stormwater Runoff Control

N/A to ECSD No. 6.

6. Post-Construction Stormwater Management

N/A to ECSD No. 6.

7. Pollution Prevention and Good Housekeeping

a. Annually, from **April 1 through October 31**, all streets located in **sewersheds** *discharging* to phosphorus impaired segments must be swept.

This requirement is not applicable to ECSD No. 6.

b. Within six (6) months of *outfall* inspection, ECSD No. 6 will initiate actions to repair all *outfall* protection and/or bank stability problems identified during the inspection.

Document the completion of this requirement in the *SWMP Plan*.

8. Planned Upgrades to *Municipal Facilities* in **Sewersheds to Impaired Waters**

Not applicable to ECSD No. 6.

