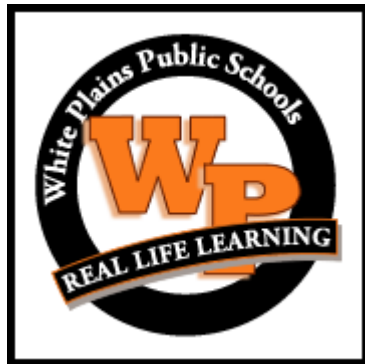


STORMWATER MANAGEMENT PROGRAM PLAN

White Plains City School District
White Plains, New York

MS4 SPDES Identification No.:
NYR20A505

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INTRODUCTION

The White Plains City School District (WPSD) is categorized as a non-traditional Municipal Separate Storm Sewer System (MS4) under the New York State Department of Environmental Conservation (NYSDEC) State Pollution Discharge Elimination System (SPDES) General Permit for Stormwater Discharges from MS4s, the most current iteration of which is GP-0-15-003 (MS4 General Permit). WPSD has developed and implemented this Stormwater Management Program (SWMP) Plan to comply with Part IV.A. of the MS4 General Permit.

Part IV.A (“Stormwater Management Program Requirements, SWMP Background”) of the MS4 General Permit states:

Covered entities must develop (for newly authorized MS4, implement) and enforce a SWMP designed to reduce the discharge of pollutants from small MS4s to the maximum extent practicable (“MEP”) in order to protect water quality and to satisfy the appropriate water quality requirements of the Environmental Conservation Law and the Clean Water Act. The objective of the permit is for MS4s to assure achievement of the applicable water quality standards.

Part IV.B (“Stormwater Management Program Requirements, Cooperation Between Covered Entities Encouraged”) of the MS4 General Permit states:

The NYSDEC encourages covered entities to cooperate when development and implementing their SWMP. For example, municipal governments are encouraged to coordinate and cooperate with non-traditional MS4s such as DOT, school and fire districts, Federal and State facilities located within and adjacent to their jurisdictions. However, each covered entity is responsible for obtaining its own permit coverage and for filling its own Notice of Intent (NOI). Irrespective of any agreements between covered entities, each individual covered entity remains legally responsible for satisfying all MS4 General Permit requirements and for its own discharges. If one covered entity is relying on another covered entity to satisfy one or more of its permit obligations, that fact must be noted on the covered entity’s MCC form.

As a non-traditional MS4, WPSD must meet the requirements for the six Minimum Control Measures (MCMs) in accordance with Part VIII of the MS4 General Permit. Generally, these requirements include development of program to increase public awareness of the impacts of stormwater runoff, provisions for public participation in stormwater activities, implementation and enforcement of programs related to the control of illicit discharges to the storm sewer system, management of runoff from construction sites and new construction, and reduction of pollution from WPSD’s operations. Refer to Appendix A for the full text of the MCM requirements identified in the MS4 General Permit. This SWMP Plan includes Best Management Practices (BMPs) to date, and future measurable goals for each MCM. The six required MCMs are identified as:

MCM 1: Public Education and Outreach;

MCM 2: Public Involvement / Participation;

MCM 3: Illicit Discharge Detection and Elimination;

MCM 4: Construction Site Runoff Control;

MCM 5: Post-Construction Stormwater Management; and

MCM 6: Pollution Prevention / Good Housekeeping for Municipal Operations.

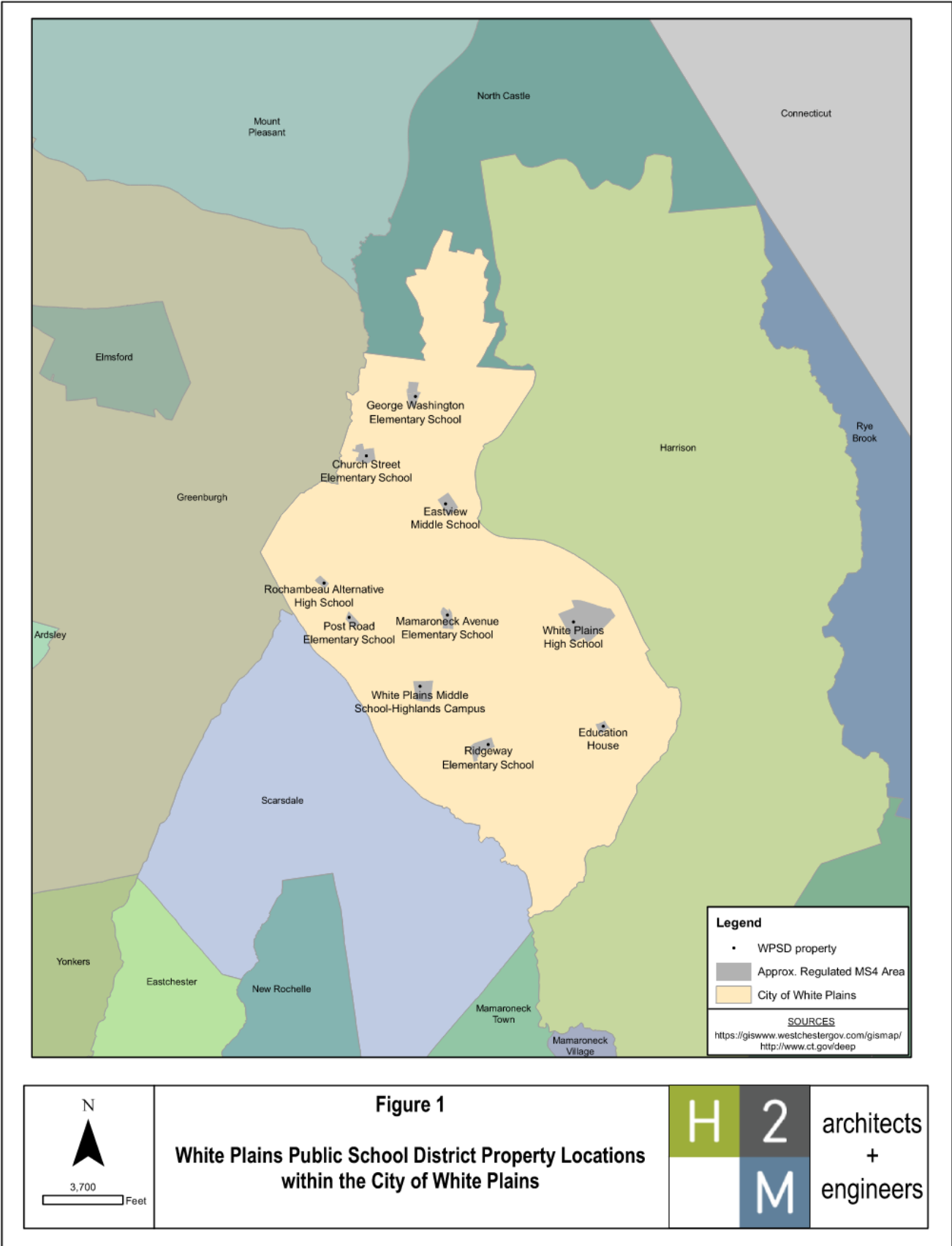
This SWMP Plan will be reviewed and modified as necessary if it is determined that changes are needed to improve implementation of the SWMP.

WHITE PLAINS CITY SCHOOL DISTRICT OVERVIEW

The WPSD is located within the City of White Plains (City), which is approximately 25 miles northeast of New York City and is bordered on the north by the Town of North Castle, on the east by the Town of Harrison, on the south by Town of Scarsdale and on the west by the Town of Greenburgh. Figure 1 represents a location map of WPSD properties in relation to the City boundaries. The WPSD regulated MS4 area is confined to the properties that make up the district as shown in this Figure.

The WPSD population consists of over 7,000 students in kindergarten through twelfth grade that attend nine district schools and also includes teachers, administrators and maintenance and operations staff. The names of the all the facilities within WPSD are listed below:

- Administrative Building; Education House
- Church Street Elementary School
- George Washington Elementary School
- Mamaroneck Ave Elementary School
- Post Road Elementary School
- Ridgeway Elementary School
- Eastview Middle School (6th grade)
- Highlands Middle School (7th & 8th grade)
- White Plains High School
- Rochambeau Alternative High School



DRAINAGE AND RECEIVING WATERS

WPSD's properties are situated within two major topographic watershed regions; the Bronx River Basin and the Coastal Long Island Sound Basin (Figure 2). Stormwater from the northwest of the City drains to the Bronx River, and stormwater from the southeast of the City drains into the Long Island Sound via the Mamaroneck River, and a small portion via the Sheldrake River.¹

¹ Source: The City of White Plains Phase II Storm Water Management Program Plan

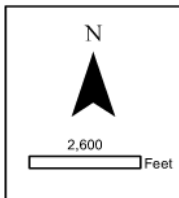
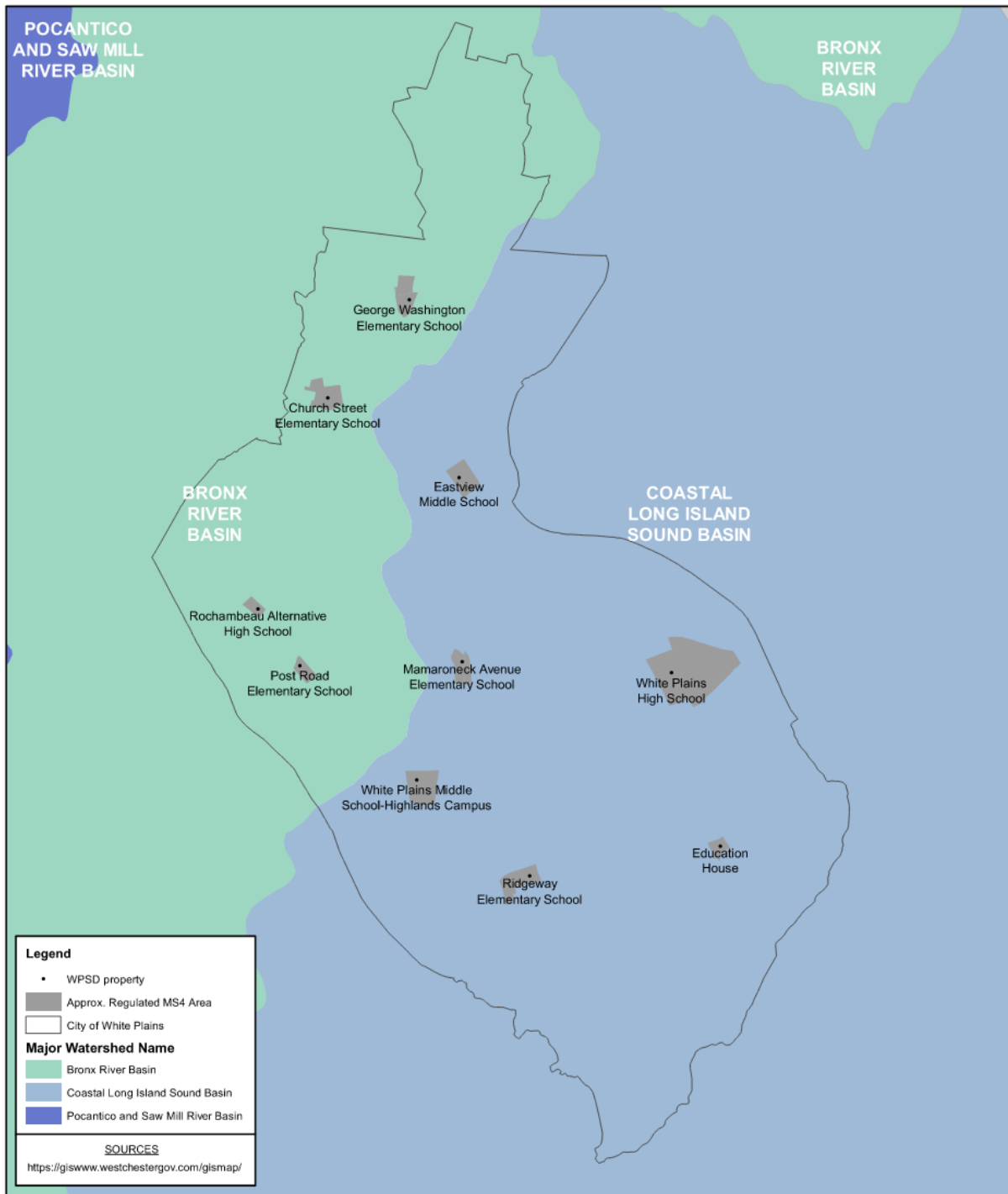


Figure 2
 White Plains Public School District Property Locations
 within Major Watersheds

IMPAIRED WATERS AND WATER BODIES OF CONCERN

The Federal Clean Water Act (CWA) requires states to periodically assess and report on the quality of waters in their state; Section 303(d) of the CWA requires that states identify impaired waters. For these identified impaired waters, states must consider the development of a Total Maximum Daily Load (TMDL) or other strategies to reduce the input of the Pollutants of Concern (POC)s restricting waterbody uses in order to restore and protect such uses. New York State has designated the following waterbody segments in the City of White Plains as impaired pursuant to these requirements. The waterbody segment and its accompanying cause/pollutant and source are shown in the table below (TABLE 1).

TABLE 1: NYSDEC 2016 Section 303(d) List
 Individual Waterbody Segments with
 Impairment Requiring TMDL Development
 City of White Plains Waterbodies²

Waterbody Segment Name	Cause/Pollutant	Source
Bronx River, Upper, and tribs	Oxygen Demand and Pathogens	Urban/Storm Runoff
Mamaroneck River, Upper, and minor tribs	Oxygen Demand and Silt/Sediment	Urban/Storm Runoff
Sheldrake River	Phosphorus and Silt/Sediment	Urban/Storm Runoff
Silver Lake	Phosphorus	Urban/Storm Runoff

POLLUTANTS OF CONCERN

Based on the land use and physical characteristics of WPSD, the following are the potential stormwater POCs for WPSD resulting from WPSD’s related activities and sources:

Floatables

Floatables is the term used to describe the trash and debris that is collected by stormwater runoff, typically from areas such as streets, sidewalks and parking lots and deposited into waterbodies. Trash and debris that enter waterbodies via stormwater degrade aesthetic quality, create a hazard for wildlife and ecosystems, and can affect drinking water supplies. Potential sources of floatables within the WPSD MS4 could include routine facility operations, cars and trucks, pedestrians, overflowing/uncovered garbage and recycling bins, animal scavenging and outdoor events.³

Silt and Sediment

Silt and sediment can be transported via stormwater runoff into waterbodies during activities such as excavation or can be dislodged and eroded dependent upon soil types, storm intensities, slopes and land coverage characteristics. Stormwater runoff that contains sediment can deposit harmful amounts of silt in sensitive areas such as wetlands and wildlife preserves, harming habitat needed by aquatic insects and plants. Sediment blocks sunlight needed by aquatic plants to grow and can carry toxic chemicals that deplete oxygen in water bodies. Thus, it can disrupt ecosystems and threaten drinking water supplies. Potential sources of silt and sediment in the WPSD MS4 could include soil erosion from construction sites, lawns, and gardening/landscaping activities.

MINIMUM CONTROL MEASURES (MCMs)

The WPSD has developed and implemented a series of Best Management Practices (BMPs) to meet the requirements of each of the six required MCMs from the MS4 General Permit. These are described below, as are future measurable goals for each MCM.

² Source: Final 2016 New York State Section 303(d) List of Impaired Waters Requiring a TMDL/Other Strategy

³ Source: <https://www.epa.gov/trash-free-waters/clean-water-act-and-trash-free-waters>

MCM 1: PUBLIC EDUCATION AND OUTREACH

Description of MCM

As described in the MS4 General Permit, the intent of the Public Education and Outreach MCM is to develop and implement BMPs that focus on the creation of educational materials designed to inform the public about the impacts that stormwater runoff has on the environment. This MCM involves teaching targeted groups about pollutants of concern most pertinent to the MS4, and steps that can be taken to reduce those pollutants. The MCM 1 BMPs are expected to reach all of the constituents within the MS4s permitted boundary.

Best Management Practices to Date

WPSD educates and provides outreach to students through a 501c3 charitable organization known as We Future Cycle. We Future Cycle helps create nearly waste-free schools by implementing robust recycling and composting programs and offers educational programs to teach students to be responsible for the waste they create.

WPSD educates all elementary school and middle school students in daily waste reduction efforts. WPSD students are invited to help at the recycling station by carefully sorting their lunch waste into compostable, recyclable, and non-recyclable materials.

Every September and October, We Future Cycle provides hands-on training to WPSD students on how organic and inorganic materials interact with environmental factors such as stormwater, and how reducing the waste they produce has positive impacts on the environment.

WPSD has environmental clubs available for student participation. The clubs provide education and awareness for students on environmental topics including, but not limited to green infrastructure, smart growth, sustainability, recycling and reusing, trash management and water conservation.

Future Measurable Goals

WPSD will continue to educate and provide outreach and hands-on training for students to students through We Future Cycle.

WPSD will continue to educate and encourage students to participate in daily waste reduction efforts.

WPSD will continue to have environmental clubs available for student participation. The clubs will provide education and awareness for students on environmental topics and may also provide the opportunity for students to work on environmental initiatives both in the district and in the community.

WPSD will consider posting stormwater content on the Facilities and Operations webpage. Potential content could include introductory information about stormwater, stormwater information specific to WPSD including pollutants of concern and their sources, MS4 annual reports, WPSD's SWMP, and links to stormwater educational information on the NYSDEC website.

WPSD will consider opportunities to include stormwater information in district Newsletters.

MCM 2: PUBLIC PARTICIPATION / INVOLVEMENT

Description of MCM

The Public Involvement/Participation MCM consists of BMPs that focus on involving the local public in development and implementation of the SWMP. The BMPs include a number of practices designed to seek public input on the SWMP and Annual Report accomplishments. They also describe specific activities that encourage public participation. The target audiences for the public involvement program

are key individuals and groups that may have an interest in the particular BMPs and the general public located within the permitted boundary.

Best Management Practices to Date

Opportunities for public participation are provided by We Future Cycle program through educational programs and events that take place in all school locations at numerous dates throughout the year.

High School students participate in an Annual Cleanup Event that occurs each Spring; the event takes place at the local cemetery and involves trash clean up. Participation occurs on a volunteer basis, and the WPSD provides necessary cleanup tools.

Stainless Steel medallions on WPSD drains read “Drain Goes to a Body of Water” to create public awareness to discourage inappropriate dumping into the storm drains. Staff members are involved in storm drain inspections to make sure they have a medallion.

WPSD has environmental clubs available for student participation. The clubs meet weekly and provide education and awareness for students on environmental topics including, but not limited to green infrastructure, smart growth, sustainability, recycling and reusing, trash management and water conservation.

WPSD students are invited to help at the recycling station by carefully sorting their lunch waste into compostable, recyclable, and non-recyclable materials.

WPSD provides the opportunity for public review and comment on the MS4 Annual Report at WPSD's Facilities and Operations Department.

Future Measurable Goals

WPSD will continue to offer opportunities for public participation provided by We Future Cycle program through educational programs and events.

WPSD will continue to host its Annual Clean Up Event and encourage High School students to participate in it by volunteering.

Staff members will continue to be involved in storm drain inspections and continue to put Stainless Steel medallions on drains.

WPSD will continue to have environmental clubs available for student participation. The clubs will continue to meet weekly, provide education and awareness for students on environmental topics, and tentatively provide the opportunity for students to work on environmental initiatives both in the district and in the community.

WPSD will continue to educate and encourage students to participate in daily waste reduction efforts.

WPSD will continue to provide the opportunity for public review and comment on the MS4 Annual Report at WPSD's Facilities and Operations Department. WPSD will provide the opportunity for the public to review and comment on the SWMP and draft Annual Report.

If comments are received, WPSD will include a summary of comments with the final Annual Report and any changes to the SWMP in response to comments will be described in the final Annual Report.

MCM 3: ILLICIT DISCHARGE DETECTION AND ELIMINATION

Description of MCM 3

The Illicit Discharge Detection and Elimination (IDDE) MCM consists of BMPs that focus on the detection and elimination of illicit discharges located within the MS4s. The BMPs describe outfall mapping and update procedures, the mechanisms that will be used to effectively prohibit illicit discharges, procedures and actions to ensure that the regulatory mechanism is implemented, the dry weather screening program, procedures for tracking down and locating the source of an illicit discharge, procedures for locating priority areas, and procedures for removing the source of the illicit discharge.

Best Management Practices to Date

WPSD conducts daily observations of district grounds to monitor that they are in state of good repair. These findings are entered into the School Dude work order system, and work orders are automatically generated to address any of the detected school grounds that need maintenance.

WPSD documents all actions taken through the School Dude work order system. Records of these documents inform whether actions taken were performed by WPSD staff or by a WPSD contractor.

WPSD uses storm drain medallions and signage on garbage cans to address illegal dumping, litter and stormwater protection.

WPSD utilizes special protocols for swimming pool operations and maintenance including safe storage and handling of pool chemicals, and implementation of proper cleaning and draining procedures in order to minimize the chance of an illegal pool water discharge.

Future Measurable Goals

WPSD will continue to maintain a state of good repair for its school grounds through daily ground inspections and the use of School Dude digital work order system.

WPSD will continue to document and keep records of maintenance actions that were performed by district staff or by an outside contractor.

WPSD will continue to use storm drain medallions and signage on garbage cans to address illegal dumping, litter and encourage stormwater protection.

WPSD will continue to utilize special protocols for swimming pool operations in order to minimize the chance of an illegal pool water discharge.

As a long-term goal, WPSD will continue to refine their understanding of their storm sewer system through continued collaboration with the City of White Plains and through efforts to utilize City stormwater mapping to map more precise locations for storm sewers, outfalls and MS4 drainage area boundaries.

WPSD will participate in City IDDE training opportunities such as courses, webcasts and seminars provided by stormwater education organizations when available.

MCM 4: CONSTRUCTION SITE STORMWATER RUNOFF CONTROL

Description of Minimum Control Measure

The Construction Site Stormwater Runoff Control MCM consists of BMPs that focus on the reduction of pollutants to the MS4 from construction activities that result in a land disturbance of greater than or equal to one acre. This MCM primarily applies to traditional MS4's which have control over land use development permit. WPSD has no approval role in development activities other than construction

activities that WPSD itself undertakes. BMPs within this section will thus describe the mechanism that will be used to require erosion and sediment controls for WPSD projects that meet the one-acre threshold.

Best Management Practices to Date

WPSD works with qualified consultants to design and implement construction activities within the WPSD MS4. Such projects that result in land disturbance greater than or equal to one acre must include appropriate erosion and sediment control practices consistent with the NYSDEC Stormwater Design Manual and preparation of a formal Stormwater Pollution Prevention Plan (SWPPP) is required. Although it is a rarity for construction of this magnitude to take place on WPSD properties, in the event one did occur, a SWPPP would be prepared and filed in accordance with these requirements.

Future Measurable Goals

WPSD will continue to ensure that qualified consultants are retained to prepare SWPPPs where needed on district properties to ensure construction activities include appropriate erosion and sediment control practices consistent with NYSDEC requirements.

MCM 5: POST-CONSTRUCTION STORMWATER MANAGEMENT

Description of Minimum Control Measure

The Post-Construction Stormwater Management MCM consists of BMPs that focus on the prevention or minimization of water quality impacts from new development and redevelopment projects that disturb greater than or equal to one acre. While MCM 4 addresses stormwater runoff during construction activities, MCM 5 addresses how runoff is controlled after the project is complete on a long-term basis. This MCM primarily applies to traditional MS4's which have control over land use development permits. WPSD has no approval role in development activities, therefore this MCM only applies to construction practices that the WPSD itself undertakes.

Best Management Practices to Date

WPSD ensures its consultants comply with NYSDEC regulations relative to control of stormwater and pollutants associated with post-construction runoff.

WPSD regularly inspects and maintains post-construction stormwater management practices associated with the High School athletic field and green infrastructure including a rain garden located at Church Street Elementary School.

WPSD conducts daily observations of district grounds to monitor that they are in state of good repair. These findings are entered into the School Dude work order system, and work orders are automatically generated to address needed maintenance including actions for stormwater management practices.

WPSD documents all actions taken through the School Dude work order system. Records of these documents inform whether maintenance actions were performed by WPSD staff or by a WPSD contractor.

Future Measurable Goals

WPSD will continue to ensure its consultants comply with NYSDEC regulations relative to control of stormwater and pollutants associated with post-construction runoff.

WPSD will continue to regularly inspect and maintain post-construction stormwater management practices associated with the High School athletic field and the rain garden located at Church Street Elementary School.

WPSD will identify additional existing post construction controls if applicable and continue to maintain a state of good repair on their grounds.

WPSD will continue daily inspections and continue keep records of maintenance actions that were performed by district staff or by an outside contractor.

MCM 6: POLLUTION PREVENTION/GOOD HOUSEKEEPING FOR MUNICIPAL OPERATIONS

Description of Minimum Control Measure

The Pollution Prevention/Good Housekeeping MCM consists of BMPs that focus on training of staff and on the prevention or reduction of pollutant runoff from MS4 operations. As a non-traditional MS4, not all operations typically discussed within MCM 6 apply to WPSD. This section identifies the MCM 6 operations applicable to and performed by WPSD and the BMPs for each operation.

In general, WPSD approach to operations includes the conduct assessments of daily inspections of district grounds to monitor that they are in state of good repair. During these inspections, findings are entered into the School Dude work order system, and work orders are automatically generated to address any detected areas that need maintenance. Based on the nature of the tasks within the work orders, they are either assigned to WPSD staff or issued to WPSD contractors.

Best Management Practices to Date

Street Maintenance/Right-of-way Maintenance

WPSD contractors sweep the district's internal roadways. Sweeping occurs based on the needs that are identified during the grounds crew's daily inspections. WPSD contractors repair internal roadways when necessary.

Observations are made to determine if WPSD's sidewalks and other pedestrian walkways need maintenance during daily inspections. WPSD staff will handle maintenance needs internally if possible or a WPSD contractor will address any repairs needed.

Parks and Open Space

WPSD has a total of approximately 163 acres of property with 31 fields. WPSD staff is responsible for seeding and striping of athletic fields. WPSD contractors perform landscaping activities and maintenance of lawns for WPSD properties. These areas are also reviewed as part of the daily inspections.

WPSD has prohibited the use of chemical fertilizers and pesticides on all district lawns. WPSD currently utilizes organic fertilizers on lawns throughout the district.

Stormwater System Maintenance

Observations are made to determine if WPSD's catch basins need maintenance during daily inspections. WPSD staff is responsible for cleaning of catch basins and WPSD contractors are responsible for rebuilding of catch basins and camera inspections where they are necessary.

Winter Road Maintenance/ Salt Storage

WPSD staff performs internal driveway and walkway winter maintenance and salt storage. WPSD utilizes brine for roadway maintenance; this method requires less salt compared to utilizing traditional road salt for de-icing. WPSD's salt storage is in containment in a shed and is stored until it is needed for de-icing activities.

New Municipal Construction and Land Disturbance

WPSD is committed to following NYSDEC regulations with respect to new construction and land disturbance greater than or equal to one acre on their properties.

Municipal Building

Observations are made to determine if WPSD's building facilities need maintenance during daily inspections. WPSD staff is responsible for inspecting and cleaning roof gutters and vertical leaders when necessary.

WPSD contractors handle hazardous waste. Most of the hazardous wastes WPSD produces are from lab chemicals. There are special protocols in place for storage and handling of hazardous wastes in order to minimize the chance of spills and ensure safe transport and disposal.

Solid Waste Management

WPSD stores solid waste outdoors in containers that have lids. Additionally, the We Future Cycle program helps greatly reduce waste from schools by implementing robust recycling and composting programs. In the 2017/2018 school year, total waste diversion was approximately 1,850 lbs per day. The City of White Plains provides refuse collection for all WPSD properties. Refuse collection occurs weekly on WPSD properties. Through these efforts WPSD's solid waste is maintained in a manner that minimizes the potential for litter and floatables to be generated from district properties.

MCM 6 Operations Performed by Others for WPSD:

Vehicle and Fleet Maintenance

WPSD has between 20-25 vehicles. The City provides basic maintenance and repair for the WPSD's vehicles at an offsite facility. Maintenance, and repair of WPSD's bus fleet is done by outside contractors at the offsite facility. Fueling of WPSD vehicles is performed at City facilities.

Bridge Maintenance/ Marine Operations/ Hydrologic Habitat Modification

Not applicable to WPSD.

Other

Outdoor equipment maintenance is completed off-site at a City facility.

Future Measurable Goals

WPSD will continue the conduct of daily inspections of district grounds to monitor that they are in state of good repair.

WPSD will continue to utilize the School Dude work order system to address any detected areas that need maintenance.

WPSD contractors will continue to sweep and repair the district's internal roadways when necessary.

WPSD's sidewalks and other pedestrian walkways will continue to be maintained internally when possible or by a WPSD contractor when repairs are needed.

WPSD staff will continue to seed and stripe athletic fields. WPSD contractors will continue to perform landscaping activities and maintenance of lawns for WPSD properties.

WPSD will continue to prohibit the use of chemical fertilizers and pesticides on all district lawns. WPSD currently utilizes organic fertilizers on lawns throughout the district.

WPSD staff will continue to clean catch basins when necessary. WPSD contractors will continue to rebuild catch basins and conduct camera inspections when necessary.

WPSD staff will continue to perform internal driveway and walkway winter maintenance and salt storage. WPSD will continue to utilize brine for roadway maintenance. WPSD's salt storage will continue to be contained in a shed.

WPSD will continue to be committed to following NYSDEC regulations with respect to new construction and land disturbance greater than or equal to one acre on their properties.

WPSD staff will continue to inspect and clean roof gutters and vertical leaders when necessary.

WPSD will continue to utilize special protocols for storage and handling of hazardous wastes in order to minimize the chance of spills.

WPSD will continue to store solid waste outdoors in containers that have lids. Additionally, the We Future Cycle program will continue to reduce waste from schools by implementing robust recycling and composting programs. The City of White Plains will continue to provide refuse collection for all WPSD properties. WPSD's solid waste will continue to be maintained in a manner that minimizes the potential for floatables to be generated from district properties.

The City will continue to provide basic maintenance and repair for the WPSD's vehicles at an off-site facility. Maintenance and repair of WPSD's bus fleet will continue to be done by outside contractors at an offsite facility. Fueling of WPSD vehicles will continue to be done at City facilities.

Outdoor equipment maintenance will continue to be completed off-site at a City facility.

WPSD will consider expanding their food-composting program at district properties. WPSD will identify opportunities to collaborate with the County and the City to achieve this goal.

APPENDIX A

MINIMUM CONTROL MEASURES – TRADITIONAL NONLAND USE CONTROL AND NON-TRADITIONAL MS4s

A. Traditional Non-Land Use Control and Non-traditional MS4 Minimum Control Measures (MCMs)

These MCMs apply to traditional non-land use control MS4s and non-traditional MS4s. The SWMP for these small MS4s must be comprised of the 6 MCMs below. It is recommended that covered entities refer to assistance and guidance documents available from the State and EPA.

Under this SPDES general permit, the continuing covered entities are required to implement their SWMP, including the MCM requirements below. Newly regulated covered entities are required to develop their SWMP, containing the MCM requirements below, within the first 3 years of coverage and then commence implementation.

The covered entity may develop (for newly authorized MS4s) and / or implement their SWMP within their jurisdiction on their own. The covered entity may also develop (for newly authorized MS4s) and / or implement part or all of their SWMP through an intermunicipal program with another covered entity(s) or through other cooperative or contractual agreements with third parties that provide services to the covered entity(s).

For each of the elements of the SWMP plan, the covered entity must identify (i) the agencies and/or offices that would be responsible for implementing the SWMP plan element and (ii) any protocols for coordination among such agencies and/or offices necessary for the implementation of the plan element.

To comply with the requirements of this SPDES general permit, the traditional non-land use control MS4s and non-traditional MS4s should consider their public to be the employee / user population, visitors, or contractors / developers. Examples of the public include, but are not limited to:

- Transportation covered entities;
- General public using or living along transportation systems, staff, contractors;
- Educational covered entities -faculty, other staff, students, visitors; and
- Other government covered entities -staff, contractors, visitors.

General Permit Requirements

1. Public Education and Outreach – MCM 1

At a minimum, all covered entities must:

- a. Identify POCs, waterbodies of concern, geographic areas of concern, target audiences;
- b. Develop and implement an ongoing public education and outreach program designed to describe:
 - i. the impacts of stormwater discharges on waterbodies;
 - ii. POCs and their sources;
 - iii. steps that contributors of these pollutants can take to reduce pollutants in stormwater runoff; and
 - iv. steps that contributors of non-stormwater discharges can take to reduce pollutants (non-stormwater discharges are listed in Part I.A.2 in the GP 0-15-003).
- c. Educational materials may be made available at, locations including, but not limited to:
 - i. At service areas, lobbies, or other location where information is made available;

- ii. At staff training;
 - iii. On covered entity's website;
 - iv. With pay checks; and
 - v. In employee break rooms.
- d. Develop, record, periodically assess and modify as needed measurable goals; and
 - e. Select and implement appropriate education and outreach activities and measurable goals to ensure the reduction of all POC's in stormwater discharges to the MEP.

2. Public Involvement/Participation – MCM 2

At a minimum, all covered entities must:

- a. Comply with State and local public notice requirements below when implementing a public involvement/participation program.
 - i. Non-traditional MS4s may comply with this requirement by determining who their public staff is (staff, visitors, contractors, ect.) and posting notifications (as needed) in areas viewable by the public. Such small MS4s whose public are in multiple locations, notifications shall be available to the public in all locations within the urbanized or additionally designated areas;
- b. Provide the opportunity for the public to participate in the development, implementation, review, and revision of the SWMP;
- c. Identify a local point of contact for the public concern regarding stormwater management and compliance with the SPDES general permit. The name or title of the contact and telephone number must be published in public outreach and public participation material and kept updated with the Department on the MCC form;
- d. Below are the requirements for the MS4 Annual Report Presentation:
 - i. Prior to submitting the final annual report to the Department, by June 1 of each reporting year, present the draft annual report in a format that is open to the public, where the public can ask questions and make comments on the report. This can be done:
 - At a meeting that is open to the public, where the public attendees are able to ask questions about and make comment on the report. This may be a regular meeting on an existing board. It may also be a separate meeting, specifically for stormwater. If multiple covered entities are working together, they may have a group meeting.
 - On the internet by:
 - Making the annual report available to the public on a website;
 - Providing the public the opportunity to provide comments on the internet or otherwise; and
 - Making available the opportunity for the public to request an open public meeting to ask question about and make comments on the report.
 - ii. Non-traditional MS4s typically do not have regular meeting during which a presentation on the annual report can be made. Those covered entities may comply with this requirement by either:
 - Noticing the availability of the report for public comment by posting a sign, posting on the website, or other methods with information about the availability and location where the public can view it and contact information for those that read the report to submit comments; or
 - Following the internet presentation as explained in (d)(i) above;

- iii. The Department recommends that announcements be sent directly to individuals (public and private interested parties) known to have a specific interest in the covered entity's SWMP;
- iv. Include a summary of comments and intended responses with the final annual report. Changes made the SWMP in response to comment should be described in the annual report; and
- v. Ensure that a copy of the final report and, beginning in 2009, the SWMP plan are available for public inspection;
- e. Develop, record, periodically assess and modify as needed measurable goals, and
- f. Select and implement appropriate public involvement/participation activities and measurable goals to ensure the reduction of all of the POCs in stormwater discharges to the MEP.

3. Illicit Discharge Detection and Elimination (IDDE) – MCM 3

At a minimum, all covered entities must:

- a. Develop, implement and enforce a program to detect and eliminate illicit discharged into the small MS4;
- b. Develop and maintain a map, at a minimum within the covered entity's jurisdiction in the urbanized area and additionally designated area, showing:
 - i. The location of all outfalls and the names and location of all surface waters of the State that receive discharged from those outfalls;
 - ii. By March 9, 2010 the preliminary boundaries of the covered entity's storm sewersheds determined using GIS or other tools, even if they extend outside or the urbanized area (to facilitate trackdown), and additionally designated area within the covered entity's jurisdiction; and
 - iii. When grant funds are made available or for sewer lines surveyed during an illicit discharge trackdown, the covered entity's storm sewer system in accordance with available State and EPA guidance;
- c. Field verify outfall locations;
- d. Conduct an outfall reconnaissance inventory, as described in the EPA publication entitled Illicit Discharge Detection and Elimination: A Guidance Manual for Program Development and Technical Assessment, addressing every outfall within the urbanized area and additionally designated area within the covered entity's jurisdiction at least once every five years, with reasonable progress each year;
- e. Map new outfalls as they are constructed or discovered within the urbanized area or additionally designated area;
- f. Prohibit illicit discharged into the small MS4 and implement appropriate enforcement procedures and actions below, as applicable:
 - i. For Non-traditional MS4s:
 - Prohibit and enforce against illicit discharges through available mechanisms (i.e. tenant lease agreements, bid specifications, requests for proposals, standard contract provisions, connection permits, maintenance directives/BMPs, access permits consultant agreements, internal policies);
 - Procedures or policies must be developed for implementation and enforcement of the mechanisms;
 - A written directive from the person authorized to sign the NOI stating that updated mechanisms must be used and who is responsible for ensuring compliance with and enforcing the mechanisms for the covered entity's IDDE program; and

- The mechanisms and directive must be equivalent to the State's model illicit discharge local law.
- g. Develop and implement a program to detect and address non-stormwater discharges, including illegal dumping, to the small MS4. The program must include: procedures for identifying priority areas of concern (geographic, audiences, or otherwise) for IDDE program, description of priority areas on concern, available equipment, staff, funding, ect.; procedures for identifying and locating illicit discharges (trackdown); procedures for eliminating illicit discharges; and procedures for documenting actions;
- h. Inform the public of the hazards associated with illegal discharges and the improper disposal of waste;
- i. Address the categories of non-stormwater discharges or flows listed in Part I.A.2 of the general permit as necessary and maintain records of notification;
- j. Develop, record, periodically assess, and modify as needed measurable goals, and
- k. Select and implement appropriate IDDE BMPs and measurable goals to ensure the reduction of all POCs in stormwater discharges to the MEP.

4. Construction Site Stormwater Runoff Control – MCM 4

At a minimum, all covered entities must:

- a. Develop, implement, and enforce a program that:
 - i. Provides equivalent protection to the NYS SPDES General Permit for Stormwater Discharges from Construction Activities (GP-0-15-002);
 - ii. Addresses stormwater runoff to the small MS4 from construction activities that result in a land disturbance of greater than or equal to one acre. Control of stormwater discharges from construction activities disturbing less than one acre must be included in the program if:
 - That construction activity is part of a larger common plan of development or sale that would disturb one acre or more; or
 - If controlling such activities in a particular watershed is required by the Department.
 - iii. Incorporates mechanisms for construction runoff requirements from new development and redevelopment project to the extent allowable under State and local law that meet the State's most current technical standards:
 - Through available mechanisms (i.e. tenant lease agreements, bid specifications, requests for proposals, standard contract provisions, connection permits, maintenance directives/BMPs, access permits, consultant agreements, internal policies);
 - Procedures or policies must be developed for implementation and enforcement of the mechanisms;
 - A written directive from the person authorized to sign the NOI stating that updated mechanisms must be used and who is responsible for ensuring compliance with and enforcing the mechanisms for constructions projects that occur on property owned, under easement to, within the right-of-way of, or under the maintenance jurisdiction by the covered entity or within the maintenance jurisdiction of the MS4; and
 - The mechanisms and directive must be equivalent to the requirements of the NYS SPDES General Permit for Stormwater Discharges from Construction Activities (GP-0-15-002).
 - iv. Allows for sanctions to ensure compliance to the extent allowable by state law;
 - v. Describes procedures for receipt and follow up on complaints or other information submitted by the public regarding construction site stormwater runoff;

- vi. Educates construction site operators, design engineers, municipal staff and other individuals to whom these regulations apply about the construction requirements in the covered entity's jurisdiction, including the procedures for submission of Stormwater Pollution Prevention Plans (SWPPPs), construction site inspections, and other procedures associated with control of construction stormwater;
- vii. Ensures that construction site contacts have received erosion and sediment control training, including the trained contractors as defined in the SPDES general permit for construction, before they do work within the covered entity's jurisdiction:
 - Training may be provided by the Department or other qualified entities (such as Soil and Water Conservation Districts);
 - The covered entity is not expected to perform such training, but they may co-sponsor training for construction site operators in their area,
 - The covered entity may ask for a certificate or completion or other such proof of training; and
 - The covered entity may provide notice of upcoming sediment and erosion control training by posting in the building department or distribute with building permit application.
- viii. Establishes and maintains an inventory of active construction sites, including the location of the site, owner/operator contact information;
- ix. Develop, record, periodically assess and modify as needed measurable goals, and
- x. Select and implement appropriate construction stormwater BMPs and measurable goals to ensure the reduction of all POCs in stormwater discharges to the MEP.

5. Post-Construction Stormwater Management – MCM 5

At a minimum, all covered entities must:

- a. Develop, implement, and enforce a program that:
 - i. Provides equivalent protection to the NYS SPDES General Permit for Stormwater Discharges from Construction Activities, unless more stringent requirements are contained within this SPDES general permit;
 - ii. Addresses stormwater runoff from new development and redevelopment projects to the small MS4 from projects that result in a land disturbance of greater than or equal to one acre. Control of stormwater discharges from projects of less than once acre must be included in the program if:
 - That project is part of a larger common plan of development or sale; and
 - If controlling such activities in a particular watershed is required by the Department.
 - iii. Incorporates enforceable mechanisms for post-construction runoff control from new development and re-development projects to the extent allowable under State or local law that meet the State's most current technical standards:
 - Through available mechanisms (i.e. tenant lease agreements, bid specifications, requests for proposals, standard contract provisions, connection permits, maintenance directives/BMPs, access permits, consultant agreements, internal policies);
 - Procedures or policies must be developed for implementation and enforcement of the mechanisms;
 - A written directive from the person authorized to sign the NOI stating that updating mechanisms must be used and who is responsible for ensuring compliance with and

- enforcing the mechanisms for construction projects that occur on property owned by the covered entity or within the maintenance jurisdiction of the MS4; and
- The mechanisms and directive must assure compliance with the requirements of the NYS SPDES General Permit for Stormwater discharges from Construction Activities (GP-0-15-002).
- iv. Includes a combination of structural or non-structural management practices (according to standard defined in the most current version of the NYS Stormwater management Design Manual) that will reduce the discharge of pollutants to the MEP. In the development of environmental plans such as watershed plans, open space preservation programs, local laws, and ordinances covered entities must incorporate principles of Low Impact Development (LID), Better Site Design (BSD) and other Green Infrastructure practices to the MEP. Covered entities must consider natural resource protection, impervious area reduction, maintaining natural hydrologic condition in developments, buffers or reduction, maintaining natural hydrologic condition is developments, buffers or set back distances for protection of environmentally sensitive areas such as streams, wetlands, and erodible soils in the development of environmental plans:
- If stormwater management practice is designed and installed in accordance with the New York State Stormwater Management Design Manual or had been demonstrated to be equivalent and is properly operated and maintained, then MEP will be assumed to be met for the post construction stormwater discharged by the practice;
- v. Establish and maintain an inventory or post-construction stormwater management practice to include at a minimum practices discharging to the small MS4 that have been installed since March 10, 2003, those owned by the small MS4, and those found to cause water quality standard violation:
- The inventory shall include, at a minimum: location of practice (street address or coordinated); type of practice maintenance needed per the NYS Stormwater management Design Manual, SWPPP, or other provided documentation; and dates and type of maintenance performed;
- vi. Ensures adequate long-term operation and maintenance of management practices by trained staff, including assessment to ensure that the practices are performing properly:
- The assessment shall include the inspection items identified in the maintenance requirements (NYS Stormwater Management Design Manual, SWPPP or other maintenance information) for the practice. Covered entities are not required to collect stormwater samples and perform specific chemical analysis;
- vii. Covered entities may include in the SWMP Plan provisions for development of a banking and credit system. MS4s must have an existing watershed plan based on which offsite alternative stormwater management in lieu of or in addition to on-site stormwater management practices are evaluated. Redevelopment projects must be evaluated for pollutant reduction greater than required treatment by the state standards. The individual project must be reviewed and approved by the Department. Use of banking and credit system for new development is only acceptable in the impaired watersheds to achieve the no net increase requirement and watershed improvement strategy areas to achieve pollutant reductions in accordance with watershed plan load reduction goals. A banking and credit system must at minimum include:
- Ensures offset exceeds standard reduction by factor of at least 2;
 - Offset is implemented within the same watershed;
 - Proposed offset addresses the POC of the watershed;
 - Tracking system is established for the watershed;
 - Mitigation is applied for retrofit or redevelopment;
 - Offset project is completed prior to beginning the proposed construction; and

- A legal mechanism is established to implement the banking and credit system.
- b. Develop, implement, and provide adequate resources for a program to inspect development and re-development sites by trained staff and to enforce and employ sanctions;
- c. Select and implement appropriate post-construction stormwater BMPs and measurable goals to ensure the reduction of all POCs in stormwater discharges to the MEP.

6. Pollution Prevention/Good Housekeeping For Municipal Operations – MCM 6

At a minimum, all covered entities must:

- a. Develop and implement a pollution prevention/good housekeeping program for municipal operations and facilities that:
 - i. Addresses municipal operation and facilities that contribute or potentially contribute POCs to the small MS4 system. The operations and facilities may include, but are not limited to; street and bridge maintenance; winter road maintenance; stormwater system maintenance; vehicle and fleet maintenance; park and open space maintenance; municipal building maintenance; park and open space maintenance; municipal building maintenance; solid waste management; new construction and land disturbances; right-of-way maintenance; marine operations; hydrologic habitat modification, or other;
 - ii. Includes the performance and documentation of a self assessment of all municipal operations to:
 - Determine the sources of pollutants potentially generated by the covered entity's operations and facilities; and
 - Identify the municipal operations and facilities that will be addressed by the pollution prevention and good housekeeping program, if it is not done already.
 - iii. Determines management practices, policies, procedures, etc. that will be developed and implemented to reduce or prevent the discharge of (potential) pollutants. Refer to management practice identified in the "NYS Pollution Prevention and Good Housekeeping Assistance Document" or other guidance materials available from the EPA, the State, or other organizations;
 - iv. Prioritizes pollution prevention and good house keeping efforts based on geographic area, potential to improve water quality, facilities or operations most in need of modification or improvement, and covered entity's capabilities;
 - v. Addresses pollution prevention and good house keeping priorities;
 - vi. Includes an employee pollution prevention and good housekeeping training program and ensure that staff receive and utilize training;
 - vii. Requires third party entities performing contracted services, including but not limited to, street sweeping, snow removal, lawn/grounds care, etc., to make the necessary certification in Part IV.G; and
 - viii. Requires municipal operations and facilities that would otherwise be subject to the NYS Multisector general permit (MSGP-0-12-001) for industrial stormwater discharges to prepare and implement provisions in the SWMP that comply with Parts III. A, C, D, J, K and L of the MSGP. The covered entity must also perform monitoring and record keeping in accordance with Part IV. Of the MSGP. Discharge monitoring reporting must be attached to the MS4 annual report. Those operations or facilities are not required to gain coverage under the MSGP. Implementation the above noted provisions of the SWMP will ensure that MEP is met for discharges from those facilities;
- b. Consider and incorporate cost effective runoff reduction techniques and green infrastructure in the routine upgrade of the existing stormwater conveyance systems and municipal properties to the

MEP. Some examples include replacement of closed drainage with grass swales, replacement of the existing islands in parking lots with rain garden, or curb cuts to route the flow through below grade infiltration areas or other low cost improvements that provide runoff treatment or reduction.

- c. Develop, record, periodically assess and modify as needed measurable goals; and as needed measurable goals;
- d. Select and implement appropriate pollution prevention and good housekeeping BMPs and measurable goals to ensure the reduction of all POCs in stormwater discharges to the MEP; and
- e. Adopt techniques to reduce the use of fertilizers, pesticides, and herbicides, as well as potential impact to surface water.