



CROTON-HARMON UNION FREE SCHOOL DISTRICT

MUNICIPAL FACILITY AND OPERATIONS PROGRAM

MS4 PERMIT ID NO. NYR20A520

OCTOBER 2025



TABLE OF CONTENTS

1	INTRODUCTION.....	1
2	MUNICIPAL FACILITY PROGRAM.....	2
2.1	MUNICIPAL FACILITY PROCEDURES.....	2
2.2	TRAINING PROVISIONS.....	2
2.3	PROGRAM UPDATES	3
2.4	MUNICIPAL FACILITY INVENTORY	3
3	MUNICIPAL OPERATIONS PROGRAM.....	4
3.1	MUNICIPAL FACILITY PROCEDURES.....	4
3.2	CATCH BASIN MAINTENANCE REQUIREMENTS.....	4
4	MUNICIPAL OPERATIONS PROGRAM.....	5
4.1	MUNICIPAL FACILITY PROCEDURES.....	5
4.2	CATCH BASIN MAINTENANCE REQUIREMENTS.....	5
4.3	ROADS, PARKING LOTS, AND RIGHT-OF-WAY MAINTENANCE REQUIREMENTS.....	6
4.3.1	SWEEPING PROCEDURES	6
4.3.2	MAINTENANCE	7
4.3.3	WINTER ROAD MAINTENANCE.....	7
4.4	TRAINING PROVISIONS.....	8
4.5	PROGRAM UPDATES	8

APPENDICES

APPENDIX A	MUNICIPAL FACILITY TRAINING CONTACTS
APPENDIX B	MUNICIPAL FACILITY INVENTORY
APPENDIX C	CATCH BASIN INSPECTION INVENTORY
APPENDIX D	MUNICIPAL OPERATIONS TRAINING CONTACTS

1 INTRODUCTION

The Croton-Harmon Union Free School District (District) has prepared the Municipal Facility and Operations Program to address requirements of the United States Environmental Protection Agency's 2025 State Pollutant Discharge Elimination System (SPDES) General Permit for Stormwater Discharges from Small Municipal Separate Storm Sewer Systems (MS4) Permit. This program is part of the overall Stormwater Management Program (SWMP). This plan, as well as the SWMP, will be updated accordingly during the permit term as the District's activities are modified.

The MS4 Permit requires that within three (3) years of the estimated date of completion (EDC), the District must develop and implement a municipal facility and operations program. This program addresses Minimum Control Measures (MCM) 6 of MCMs for Traditional Non-Land Use Control & Non-Traditional MS4 Operators (Part VII.F) of the SPDES General Permit. To fulfill MCM 6, Pollution Prevention and Good Housekeeping, the District aims to describe and implement procedures that minimize pollutant discharges. Ultimately, the program ensures that the District's activities do not contribute pollutants to surface waters of the State.

For the inventory of District-owned facilities, the District performed an evaluation of municipal facilities. The goal of the inventory is to assess the impact of stormwater runoff from municipal facilities and develop necessary Best Management Practices (BMPs) to protect stormwater quality.

The BMPs are also incorporated into the municipal operations program to utilize the maintenance of operations as a means of prevention. Municipal operations consist of street and bridge maintenance; winter road maintenance; MS4 maintenance; open space maintenance; solid waste management; new construction and land disturbances; or right-of-way maintenance. The program tracks maintenance requirements for said operations, in addition to catch basin inspections and inventory.

2 MUNICIPAL FACILITY PROGRAM

2.1 MUNICIPAL FACILITY PROCEDURES

1. High Priority Municipal Facility Requirements

High priority municipal facilities are facilities storing chemicals, salt, petroleum, pesticides, fertilizers, antifreeze, lead acid batteries, tires, waste/debris, fueling stations, and/or vehicle or equipment maintained and repaired. A facility is designated as high priority only if its activities are subject to stormwater exposure. The District does not currently have any high priority facilities.

2. Low Priority Municipal Facility Requirements

The three municipal facilities, Croton-Harmon Elementary, Middle and High School, are considered low priority facilities. Low priority facilities are not required to conduct wet weather visual monitoring. The inspection and sampling program will be carried out at each municipal facility.

Each municipal facility is required to conduct comprehensive site assessments every five (5) years using the Municipal Facility Assessment Form (Appendix D of the SWMP). The following findings must be recorded in the SWMP:

- I. The municipal facility complies with the terms and conditions of this SPDES general permit.
- II. If deficiencies are found and may lead to discharge violations reasonably likely to affect human health or the environment, all appropriate actions will be taken to minimize such discharges. Within twenty-four (24) hours, the District is to prepare a schedule detailing corrective actions and specific interim milestones until the corrective action is completed.
- III. If deficiencies are identified but the discharge violations are not reasonably likely to affect human health or the environment, all appropriate actions will still be taken to minimize discharges. Within seven (7) days, the District is to prepare a schedule of corrective actions and related interim milestones until completion.

2.2 TRAINING PROVISIONS

The training provisions for the District's municipal facility procedures are as follows:

- a. If new staff are added, training on the MS4 Operator's municipal facility procedures must be given prior to conducting municipal facility procedures;

- b. For existing staff, training on the MS4 Operator's municipal facility procedures must be given prior to conducting municipal facility procedures and once every five (5) years, thereafter; and
- c. If the municipal facility procedures are updated, training on the updates must be given to all staff prior to conducting municipal facility procedures.

Refer to Appendix A for the contacts of the individuals who have received municipal facility training.

2.3 PROGRAM UPDATES

Annually, by April 1, the District will review and update the municipal facility procedures and document the completion of this requirement in the SWMP plan.

2.4 MUNICIPAL FACILITY INVENTORY

The District will update the inventory if new municipal facilities are added on an annual basis. Refer to Appendix B for the Municipal Facility Inventory.

3 MUNICIPAL OPERATIONS PROGRAM

3.1 MUNICIPAL FACILITY PROCEDURES

The District is responsible for ensuring compliance with the terms and conditions of this SPDES general permit. In the case that corrective actions must be implemented, the following schedule will be upheld to ensure operations are in compliance with the terms and conditions of this SPDES general permit:

- a. Within twenty-four (24) hours of discovery of situations that have a reasonable likelihood of adversely affecting human health or the environment.
 - b. 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
 - c. 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 that will ensure compliance in the shortest reasonable time.
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3.2 CATCH BASIN MAINTENANCE REQUIREMENTS

The District is responsible for identifying when a catch basin inspection is needed with consideration for areas with construction activities, residential, commercial, and industrial areas, recurring or history of issues, or confirmed citizen complaints on three or more separate occasions in the last 12 months.

Refer to Appendix C for the Catch Basin Inspection Inventory.

Based on inspection results, the District will clean out catch basins 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.
- c. The District is not required to clean out catch basins if the catch basins are operating properly and:

4 MUNICIPAL OPERATIONS PROGRAM

4.1 MUNICIPAL FACILITY PROCEDURES

The District is responsible for ensuring compliance with the terms and conditions of this SPDES general permit. In the case that corrective actions must be implemented, the following schedule will be upheld to ensure operations are in compliance with the terms and conditions of this SPDES general permit:

- d. Within twenty-four (24) hours of discovery for situations that have a reasonable likelihood of adversely affecting human health or the environment.
- e. 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
- f. 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 that will ensure compliance in the shortest reasonable time.

4.2 CATCH BASIN MAINTENANCE REQUIREMENTS

The District is responsible for identifying when a catch basin inspection is needed with consideration for areas with construction activities, residential, commercial, and industrial areas, recurring or history of issues, or confirmed citizen complaints on three or more separate occasions in the last 12 months.

Refer to Appendix C for the Catch Basin Inspection Inventory.

Based on inspection results, the District will clean out catch basins within the following timeframes:

- d. 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.
- e. 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.
- f. The District is 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.

Note that the handling and disposal of the materials removed from catch basins must follow these guidelines:

1. Water removed during the catch basin cleaning process will not reenter the MS4 or surface waters of the State.
2. Material removed from catch basins is disposed of in accordance with any applicable environmental laws and regulations.
3. Material removed during the catch basin cleaning process will not reenter the MS4 or surface waters of the State.

The District will assess evidence of illicit discharges and outline referral or follow-up procedures if necessary.

4.3 ROADS, PARKING LOTS, AND RIGHT-OF-WAY MAINTENANCE REQUIREMENTS

The District is responsible for developing and implementing procedures to maintain District-owned roads, parking, and rights-of-way in regard to sweeping, general maintenance, and winter road maintenance.

4.3.1 SWEEPING PROCEDURES

Once every five (5) years in the spring, all roads, parking lots, and right of ways must be swept and/or cleaned. This requirement is not applicable to:

- a. Uncurbed roads with no catch basins.
- b. High-speed limited access highways.
- c. Roads defined as interstates, freeways and expressways, or arterials by the United States Department of Transportation, Federal Highway Administration, Highway Functional Classification Concepts, Criteria and Procedures, 2013.

Annually, from April 1 through October 31, roads in commercial areas must be swept. This requirement is not applicable to:

- a. Uncurbed roads with no catch basins.
- b. High-speed limited access highways.

- c. Roads defined as interstates, freeways and expressways, or arterials by the USDOT 2013.

The District has developed the following procedures for sweeping and/or cleaning municipal streets, parking lots, and right of ways owned/operated by the District. The procedures and completion of permit requirements are documented in the SWMP Plan.

1. Sweeping equipment and applicable settings will be selected based on the level of debris.
2. Street sweeping will be conducted in dry weather. Dry cleaning methods should be used whenever possible, with the exception of fine water spray for dust control.
3. Sweeping is conducted in a manner that avoids disposing of debris in storm drains.
4. Street sweepings and catch basin cleanings are disposed of as solid waste in accordance with applicable regulations and permits.

4.3.2 MAINTENANCE

Within five (5) years of the EDC, the District must implement the following provisions:

- a. Pave, mark, and seal in dry conditions.
- b. Stage road operations and maintenance activity (e.g., patching, potholes) to reduce the potential discharge of pollutants to the District or surface waters of the State.
- c. Restrict the use of herbicides/pesticide application to roadside vegetation.

The District has developed the following procedures for the maintenance of municipal streets, parking lots, and right of ways owned/operated by the District:

1. Perform routine inspections, testing, and maintenance on facility equipment and systems. This includes stormwater control devices (trench drains, swales, catch basin filters, etc.).
2. Ensure spill response equipment is fully stocked and readily available.
3. Provide employee training on stormwater pollution prevention.
4. Pave, mark, and seal in dry conditions.
5. Contain vehicle wash water to prevent illicit discharge into the MS4.

4.3.3 WINTER ROAD MAINTENANCE

Within five (5) years of the EDC, the District will implement the following provisions:

- a. Routinely calibrate equipment to control salt/sand application rates
- b. Ensure that routine snow disposal activities comply with the Division of Water Technical and Operation Guidance Series 5.1.11, Snow Disposal. Which prioritizes upland disposal in non-sensitive areas using sediment controls and buffer zones.

Direct disposal into surface waters is only permitted when upland options are exhausted and safety concerns arise, provided the snow is not heavily contaminated.

The District has developed the following procedures for the winter maintenance of municipal roads owned/operated by the District:

1. Cover storage piles of deicing material except when actively loading and unloading.
2. Routinely calibrate equipment used to control salt/sand application rates. Regulate the amount of salt applied to prevent over-salting of roadways and parking lots to minimize runoff concentrations.
3. Maintain proper containment and conduct regular housekeeping procedures to minimize exposure to salt and sand.

4.4 TRAINING PROVISIONS

The training provisions for the District's municipal operations procedures are as follows:

- a. If new staff are added, training on the MS4 Operator's municipal operations procedures will be given prior to conducting municipal operations procedures.
- b. For existing staff, training on the MS4 Operator's municipal operations will be given prior to conducting municipal operations procedures and once every five (5) years, thereafter.
- c. If the municipal operations procedures are updated, training on the updates will be given to all staff prior to conducting municipal operations procedures.

Refer to Appendix D for the contacts of the individuals who have received municipal operations training.

4.5 PROGRAM UPDATES

Annually, by April 1, the District will review and update the municipal operations procedures and document the completion of this requirement in the SWMP plan.

Municipal Facility and Operations Program | Appendix A

MUNICIPAL FACILITY TRAINING CONTACTS

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Municipal Facility and Operations Program | Appendix B
MUNICIPAL FACILITY INVENTORY

I. Croton-Harmon Union Free Elementary School

Street address	8 Gerstein Street Croton-on-Hudson 10520
Type of municipal facility	School
Prioritization (high or low)	Low
Receiving waterbody name and class	Croton River, Lower, Main Stream, A(T)
Receiving waterbody WI/PWL Segment ID	Croton River, Lower, Main Stream, A(T)
Contact information	Stephen Walker, 914-271-4713, stephen.walker@chufsd.org
Responsible department	
Location of SWPPP	
Type of activities present on site	
Size of facility (acres)	36
Date of last assessment	
BMPs identified	Refer to 3.6.1 of the MS4 SWMP Plan
Projected date of next comprehensive site assessment	Within five years of the EDC

II. Croton-Harmon Union Free Middle School

Street Address	3 Glen Place Croton-on-Hudson 10520
Type of Municipal Facility	School
Prioritization (high or low)	Low
Receiving waterbody name and class	Hudson River (Class SB)

Receiving waterbody WI/PWL Segment ID	H (portion 2b), Segment ID 1301-0094
Contact Information	Stephen Walker, 914-271-4713, stephen.walker@chufsd.org
Responsible Department	
Location of SWPPP	
Type of activities present on site	
Size of facility (acres)	14 (combined campus)
Date of Last Assessment	
BMPs identified	Refer to 3.6.1 of the MS4 SWMP Plan
Projected date of next comprehensive site assessment	Within five years of the EDC

III. Croton-Harmon Union Free High School

Street Address	36 Old Post Road South Croton-on-Hudson 10520
Type of Municipal Facility	School
Prioritization (high or low)	Low
Receiving waterbody name and class	Hudson River (Class SB)
Receiving waterbody WI/PWL Segment ID	H (portion 2b), Segment ID 1301-0094
Contact Information	Stephen Walker, 914-271-4713, stephen.walker@chufsd.org
Responsible Department	
Location of SWPPP	
Type of activities present on site	
Size of facility (acres)	14 (combined campus)
Date of Last Assessment	
BMPs identified	Refer to 3.6.1 of the MS4 SWMP Plan
Projected date of next comprehensive site assessment	Within five years of the EDC

CATCH BASIN INSPECTION INVENTORY

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Municipal Facility and Operations Program | Appendix D

MUNICIPAL OPERATIONS TRAINING CONTACTS

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