

**Municipal Separate Storm Sewer System
Town of East Greenbush, NY**

**Stormwater
Management Program Plan**

September 2018

Last Revised:
November 2018

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Prepared For:

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Table of Contents

<u>Section</u>	<u>Page</u>
1.0 Minimum Control Measure 1: Public Education and Outreach	1
2.0 Minimum Control Measure 2: Public Involvement/Participation	5
2.1 Open Meetings Law	5
2.2 Identification of Stakeholders.....	5
2.3 Public Involvement and Participation Opportunities	6
2.4 Local Stormwater Public Contact	7
2.5 Annual Report Presentation.....	7
2.6 Measurable Goals.....	7
3.0 Minimum Control Measure 3: Illicit Discharge Detection and Elimination	8
3.1 Measurable Goals.....	10
4.0 Minimum Control Measure 4: Construction Site Stormwater Runoff Control	11
4.1 Measurable Goals.....	14
5.0 Minimum Control Measure 5: Post-Construction Site Stormwater Runoff Control.....	15
5.1 Measurable Goals.....	17
6.0 Minimum Control Measure 6: Good Housekeeping/Pollution Prevention.....	18

Table of Contents – Continued

Appendices

Appendix A	Geographic Areas of Concern
Appendix B	Copies of Educational Material Distributed
Appendix C	Outfall Map
Appendix D	Outfall Inspection Form
Appendix E	Illicit Discharge Law
Appendix F	ESC Law
Appendix G	Construction Site Inspection and Maintenance Log Book (NYSDEC)
Appendix H	Post Construction Inventory and Inspection Manual
Appendix I	Self-Assessment Forms
Appendix J	Good Housekeeping BMP Sheets
Appendix K	Contractor Certifications
Appendix L	Training Logs

List of Acronyms

BMP	Best Management Practices
DPW	Department of Public Works (Town of East Greenbush)
IDDE	Illicit Discharge Detection and Elimination
MCM	Minimum Control Measure
MS4	Municipal Separate Storm Sewer System
NYSDEC	New York State Department of Environmental Conservation
SMO	Stormwater Management Officer
SWMP	Stormwater Management Program
SWMPP	Stormwater Management Program Plan
SWPPP	Stormwater Pollution Prevention Plan

Introduction

The Town of East Greenbush is bounded on the west by the Hudson River, contains several surface water bodies, wetlands, and various park lands: East Greenbush Town Park, Onderdonk Park, Hampton Manor Lakehouse and Park, Woodland's Eckman Park, Prospect Heights Park, and Ontario Park. The Town does not contain any combined sewer overflows, any 303(d) listed waterbodies as identified in the General Permit, and is not located in a Watershed Improvement Strategy Area. The designated Municipal Separate Storm Sewer System (MS4) boundary does not encompass the entirety of the Town.

NYS SPDES General Permit GP 0-15-003 (General Permit) requires covered entities to develop and implement a Stormwater Pollution Prevention Plan and Municipal Separate Storm Sewer System (MS4) management program to address sources of potential stormwater pollution from residential and municipal activities as well as municipal facilities. Specifically the General Permit requires that this plan include and address, through implementation of best management practices, several required elements for each of the six (6) Minimum Control Measures (MCMs). These MCMs are:

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

This plan addresses the required elements included in GP 0-15-003 for each of the six (6) MCMs, and several appendices are included that include supplemental records and other required information.

1.0 Minimum Control Measure 1: Public Education and Outreach

The Town of East Greenbush is bounded on the west by the Hudson River, contains several surface water bodies, wetlands, and various park lands: East Greenbush Town Park, Onderdonk Park, Hampton Manor Lakehouse and Park, Woodland's Eckman Park, Prospect Heights Park, and Ontario Park. The Town does not contain any combined sewer overflows, any 303(d) listed waterbodies as identified in the General Permit, and is not located in a Watershed Improvement Strategy Area. The designated MS4 boundary does not encompass the entirety of the Town, and because of the make-up of the Town, in relation to potential hot spots, major truck routes, parks, and surface waters, the entire MS4 boundary is the priority area of concern. As such, the target audience for the Town is as follows:

- Town Residents
- Town Personnel
- Town Businesses
- Contractors and Developers working within the Town

The topics included in education and outreach programs administered by the Town will include:

- Construction Sites
- General Stormwater Management Information
- Illicit Discharge Detection and Elimination
- Infrastructure Maintenance
- Storm Drain Marking
- Pesticide Application, Lawn Care, and Landscaping
- Pet Waste Management
- Recycling
- Trash Management
- Vehicle Washing
- Wetland Protection
- Pool Discharges
- Lawn and Yard Waste Management/Dumping

Stormwater pollutants of concern, their major urban contributors, and steps that can be taken to reduce the impact of pollutants of concern are shown on Table 1.1.

To aid in implementing the program for Minimum Control Measure 1, the Town will perform the following:

- Provide public access to educational brochures (Appendix B).
- Begin including educational stormwater flyer in utility bills to residents.
- Continue using e-mail distribution list to distribute stormwater-related information
- Begin using emergency alert system “Nixie” to notify residents of yard waste pick-up and other stormwater news
- Track number of construction site inspections
- Track number and dates of street sweeping activities
- Track DPW personnel attendance at the following training seminars:
 - One in-person training for all staff;
 - A second training event for the DPW supervisors.
 - Send DPW Heavy Equipment Operators to NYSDEC 4-Hour course
 - Track Planning Board member attendance at stormwater training seminars offered as part of their required continuing education.
- Participate in a storm drain marking program as resources are available.
- Continue to maintain pet waste signage throughout the Town and continue to supply pet waste disposal bags at all Town-owned parks.

Table 1.1: Pollutants of Concern and Measurable Goals

Pollutant	Source(s)	Management Strategies	Measurable Goal (On an Annual Basis March 10-March 9)
Sediment	Residential Car Washing	Wash vehicles on lawn	# of Residential Stormwater Pollution Prevention pamphlets distributed
		Use commercial car wash	
	Construction	Implementation of SWPPP Best Management Practices (projects > 1 acre in disturbance)	# Construction Site Inspections
		Protecting catch basins and swales and engaging in seeding activities before wind and/or rain events (projects < 1 acre in disturbance)	# of Residential Stormwater Pollution Prevention pamphlets distributed
	Bare Lawns	Seed bare spots	# of Residential Stormwater Pollution Prevention pamphlets distributed
	Winter Deicing	Engage in street sweeping activities as early as possible in the Spring	# of street sweeping activities
		Increase awareness of requirement to cover all truck beds transporting and loose landscaping and construction material.	# landscaping businesses notified
	Hosing of Sidewalks/Driveways	Sweep and collect sediment/debris for proper disposal	# of Residential Stormwater Pollution Prevention pamphlets distributed
Phosphorus	Landscaping	Adhering to the "Dishwasher Detergent and Nutrient Runoff Law"	# of "Dishwasher Detergent and Nutrient Runoff Law" summaries distributed
	Residential Car Washing	Use phosphate-free detergent	# of Residential Stormwater Pollution Prevention pamphlets distributed
		Use commercial car wash	
Nitrogen	Vehicle Exhaust	Avoid idling of cars for longer than a specified duration above a specified temperature <i>*Note: The Town DPW has changed at least 25% of its fleet to post-2017 Tier 4 diesel emissions standards or most current standards.</i>	# of Residential Stormwater Pollution Prevention pamphlets distributed
	Landscaping	Adhering to the "Dishwasher Detergent and Nutrient Runoff Law"	# of "Dishwasher Detergent and Nutrient Runoff Law" summaries distributed
	Pet Waste	Clean up pet waste on all properties, both public and private, and dispose of properly	# of Residential Stormwater Pollution Prevention pamphlets distributed
	Birds (geese, etc)	Avoid feeding of nuisance bird species	# of Residential Stormwater Pollution Prevention pamphlets distributed
Oil	Vehicle Use and Maintenance	Use drip pans under vehicles during maintenance activities	# of Residential Stormwater Pollution Prevention pamphlets distributed

Table 1.1: Pollutants of Concern and Measurable Goals

Pollutant	Source(s)	Management Strategies	Measurable Goal (On an Annual Basis March 10-March 9)
	Residential Car Washing	Wash vehicles on lawn	# of Residential Stormwater Pollution Prevention pamphlets distributed
		Use commercial car wash	
	Illicit Discharges	Do not dump oil and other vehicle fluids down storm drain. Bring used oil to recycling facility (auto shop, etc).	# of Residential Stormwater Pollution Prevention pamphlets distributed
Trash/Debris	Littering	Use trash cans provided by the municipality where available.	# of Residential Stormwater Pollution Prevention pamphlets distributed
	Yard Waste Dumping	Educate the public about proper yard waste management and pick-up, as well as the negative impacts resulting from yard waste dumping.	# of announcements to residents (via e-mail, nixie, pamphlet distribution, or other measures)

2.0 Minimum Control Measure 2: Public Involvement/Participation

In compliance with the Town of East Greenbush's (Town's) coverage under GP 0-15-003, the following measures regarding the public's ability to participate in the stormwater management program have been documented.

2.1 Open Meetings Law

The Town follows the State Open Meetings Law when implementing elements of the program so as to ensure adequate notification of the public.

2.2 Identification of Stakeholders

Several key groups and/or individuals, both public and private, are interested in or affected by the stormwater management program. They have been identified by the Town such that their input and participation can be requested and tracked when appropriate. The following groups and individuals have been identified, as well as the type of Stormwater Management Program (SWMP) input (list not exhaustive) that will be solicited from them during implementation of the SWMP:

- Rensselaer County MS4 Communities
 - Identification of MS4 resources; shared services
- NYSDEC
 - Submission of annual report
- Town of East Greenbush Legal Council
 - Local Laws and Ordinances (modifications to, and public notice of)
- Town Board
 - Public outreach materials and budget (determination of materials and available funds)
 - Presentation of annual report (public notice and documentation of comments)
- Building Department
 - Construction Site Inspections
 - Community hotline (effectiveness and utilization)
 - Illicit discharge detection and elimination (procedure and outcomes)

- Public Works
 - Good housekeeping/pollution prevention plan (specific best management practices and their effectiveness)
 - Training (type and frequency)
 - Inspection of stormwater management facilities (procedure and condition)
- Planning & Zoning Department
 - Inspection of stormwater management facilities (procedure and condition)
- Planning Board
 - Training (type and frequency)
- Natural Resources Work Group
 - Outfall and waterbody pollution prevention
 - Culvert condition
- Local Developers
 - Education and outreach (receptiveness to and effectiveness of)
 - Construction control measure (feasibility)
- General Public
 - Participation activities (clean-ups)

2.3 Public Involvement and Participation Opportunities

The Town provides the following opportunities for the public to play a role in the SWMP:

- Community Stormwater Hotline – This phone number is listed on the stormwater webpage within the annual report
- Annual Report Comments – The annual report process follows the State Open Meetings Law and comments will be tracked and addressed as appropriate
- SWMPP Comments – The SWMPP will be posted online, on the Town’s website, along with an invitation for comments and/or questions
- Cleanup Events
- Household Hazardous Waste Day(s)

2.4 Local Stormwater Public Contact

The Town will list the title and contact information for the stormwater point of contact on public outreach and public participation materials as well as online.

2.5 Annual Report Presentation

The annual report will be submitted by the Town to the NYSDEC by June 1 of each year. The annual report will be available to the public via the Town's stormwater webpage, after appropriate public notice has been made. The public will be invited to review the document and provide comments or request a meeting. Public notice of the availability of the annual report will be in accordance with local public notice requirements and will include the following:

- Publication of availability of the annual report in the local newspaper
- Announcement at the April Town Board meeting of the start and end dates for the public comment period, as well as directions on how the public can provide comment
 - Comments from the public that have been received prior to submission of the annual report will be incorporated as appropriate and a summary of comments will be provided within the content of the annual report. All others will be addressed in the following year's annual report.

2.6 Measurable Goals

Measurable Goals	Goal
Number of cleanup events	>1
Number of comments received on stormwater management plan.	Track annually and evaluate trends
Square feet of plantings	Track annually and evaluate trends
Number of storm drain markings	Track annually and evaluate trends
Number of individuals notified via list-serve of availability of the annual report	Track annually and evaluate trends
Number of comments received on annual report	Track annually and evaluate trends

3.0 Minimum Control Measure 3: Illicit Discharge Detection and Elimination

The Illicit Discharge Detection and Elimination (IDDE) element of the MS4 stormwater program is focused on identifying and removing non-stormwater flows from the stormwater. This program is designed to enable the MS4, through both programmatic and administrative (legal) mechanisms to:

- Identify presence of an illicit discharge,
- Track the source of an illicit discharge, and
- Prevent future illicit discharges

The Town has adopted the following program measures:

1. Implement and enforce a program to detect and eliminate illicit discharges.

Every five (5) years, Town personnel will perform outfall inspection activities on all identified outfalls within the MS4. This inspection activity will be performed during dry weather conditions and no less than 48 hours after a rainfall event. If a non-stormwater discharge is identified, the discharge is traced to the source using field knowledge and mapping, dye testing, or removing manhole covers for visual assessment. If assistance is required in the tracking of the source, the Town will procure outside consulting services as appropriate. During the outfall inspections, the inspector will fill out an inspection form for each outfall and document each location with at least one representative photo. See Appendix D.

At the completion of the inspection, the inspector will provide all relevant Town personnel with a summary of any identified illicit discharges. Town personnel will perform a follow-up field visit within one (1) week of receiving the summary document to confirm the presence of the illicit discharge, if not already confirmed during the inspection.

If presence of an illicit discharge is confirmed, the Town's Stormwater Management Officer will proceed with tracking the source of the illicit discharge and will seek termination of the illicit discharge through the local law mechanism. The Stormwater Management Officer will also log all relevant IDDE tracking and follow-up efforts (dates, point-people, measure taken, etc) for records.

Delayed compliance, when an owner of the illicit discharge has been identified, will be reported to the NYSDEC for support and follow-up.

Geographic Areas of Concern	Noted in Minimum Control Measure 1
Available Staff	Existing Public Works field personnel, Planning and Zoning Department, Building Department and Town consultants
Available Equipment	Town fleet trucks will be used as needed for cleaning illegal dump sites. Also available: dye testing kit, CCTV, vac truck. Consulting services when needed.
Available Funding	The ORI program is funded through salary for existing positions

2. Maintain a map, at a minimum within the covered entity's jurisdiction in the urbanized area and additionally designated area, showing:
 - The location of all outfalls and the names and location of all surface waters of the State that receive discharges from those outfalls – The Town of East Greenbush maintains a digital map identifying all outfalls, as well as labels for all surface waters receiving discharge from those outfalls.
 - The preliminary boundaries of the covered entity's storm sewersheds - The Town maintains a digital map identifying all storm sewersheds.
- 3. Field-verify outfall locations.

Outfall locations are confirmed during the outfall reconnaissance inventory. Outfalls that are identified that are not included on the map will be added. Outfalls that are no longer present due to reconfiguration of infrastructure will be removed from the map.

4. Prohibit, through a law, ordinance, or other regulatory mechanism, illicit discharges into the small MS4 and implement appropriate enforcement procedures and actions.

The Town's Illicit Discharge Local Law has been certified and implemented (Appendix E).

5. Inform public employees, businesses, and the general public of the hazards associated with illegal discharges and improper disposal of waste, and maintain records of notifications;

Illegal dumping/illicit discharge educational door tags are distributed, and the staff will receive illicit discharge training, along with other relevant MS4 training, annually.

6. Address the categories of non-stormwater discharges or flows listed in Part I.A.2 as necessary;

To date, the NYSDEC has not determined that one or more of the discharges listed in the reference section of the permit are a substantial contributor of pollutants to the MS4, yet if that should change the discharge will be considered illicit.

7. Develop (for newly authorized MS4s), record, periodically assess, and modify as needed, measurable goals; and

Measurable goals are listed herein, and are assessed annually during the annual report cycle.

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

These are noted under Minimum Control Measure 6, with several BMP sheets identified for various activities.

3.1 Measurable Goals

The Town is assessing the success of Minimum Control Measure 3 of its SWMP through the following measurable goals:

Measurable Goals	Goal
Number of new stormwater outfalls mapped	Map 100% of new outfalls annually
Percent completion of storm sewershed mapping	Revise as new outfalls are added, as appropriate
Number of outfalls inspected and percentage of total Number of outfalls in municipality: 149 (will be updated as new outfalls are identified)	Inspect 100% every 5 years
Number of outfalls with suspected illicit discharges	0
Number of outfalls with confirmed illicit discharges	0
Number of illicit discharges tracked to source	100% of confirmed discharges tracked
Number of illicit discharges eliminated	Remove 100% of confirmed discharges
Number of enforcement actions issued for illicit discharges and resulting rate of compliance	100% compliance following enforcement
Percent of staff in relevant positions that have received IDDE training	100% of responsible individuals trained
Number of suspected illicit discharges reported by citizens	Track annually and evaluate trends

4.0 Minimum Control Measure 4: Construction Site Stormwater Runoff Control

The Construction Site Stormwater Runoff Control element of the MS4 stormwater program is focused on ensuring construction projects that disturb one acre or more do not cause or contribute to water quality violations. This program is designed to enable the MS4, through both programmatic and administrative (legal) mechanisms to:

- Review stormwater pollution prevention plans
- Inspect active construction sites
- Enforce construction site compliance

The Town adopted the following program measures:

1. Provides equivalent protection to the NYS SPDES General Permit for Stormwater Discharges from Construction Activities

Every project disturbing one or more acre is required to prepare a stormwater pollution prevention plan (SWPPP), which is reviewed against the standards set forth in the General Permit.

2. Addresses stormwater runoff to the small MS4 from construction activities that result in a land disturbance of greater than or equal to one acre. Control of stormwater discharges from construction activity disturbing less than one (1) acre must be included in the program if:

- that particular construction activity is part of a larger common plan of development or sale that would disturb one (1) acre or more; or
- if controlling such activities in a particular watershed is required by the NYSDEC (Department);

3. Includes a law, ordinance or other regulatory mechanism to require a SWPPP for each applicable land disturbing activity that includes erosion and sediment controls that meet the State's most current technical standards.

The Town has certified and implemented an Erosion and Sediment Control Law (Appendix F).

4. Contains requirements for construction site operators to implement erosion and sediment control management practices and control waste such as discarded building materials, concrete truck washout, chemicals, litter, and sanitary waste at

the construction site that may cause adverse impacts to water quality, pursuant to the requirement of construction permit.

This is inherently included in the Town's Erosion and Sediment Control Law and is enforced via site inspections (Appendix G).

5. Allows for sanctions to ensure compliance to the extent allowable by State law;

The Town has the authority to issue Notices of Violation, Stop Work Orders, and Civil Penalties, which are tracked annually.

6. Describes procedures for SWPPP review with consideration of potential water quality impacts and review of individual SWPPPs to ensure consistency with State and local sediment and erosion control requirements;

- ensure that the individuals performing the reviews are adequately trained and understand the State and local sediment and erosion control requirements;
- all SWPPPs must be reviewed for sites where the disturbance is one acre or greater or when the site is part of a "larger common plan of development" as defined by the General Permit; and
- after review of SWPPPs, the covered entity must utilize the MS4 SWPPP Acceptance Form created by the Department and required by the SPDES General Permit for Stormwater Discharges from Construction Activity when notifying construction site owner/operators that their plans have been accepted by the covered entity.

The Town utilizes the professional services of a Town Designated Engineer for SWPPP review, and requires that an MS4 SWPPP Acceptance Form be submitted for signature as well.

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

Complaints are addressed by the Stormwater Management Officer or, when necessary, the Town Designated Engineer(s). A complaint prompts a site visit and inspection, after which the necessary measures are taken.

8. Describes procedures for site inspections and enforcement of erosion and sediment control measures including steps to identify priority sites for inspection

and enforcement based on the nature of the construction activity, topography, and the characteristics of soils and receiving water;

- The covered entity must ensure that the individual(s) performing the inspections are adequately trained and understand the State and local sediment and erosion control requirements. Adequately trained means receiving inspector training by a Department sponsored or approved training.
- All sites must be inspected where the disturbance is one (1) acre or greater.
- Covered entities must determine that it is acceptable for the owner or operator of a construction project to submit the Notice of Termination (NOT) to the Department by performing a final site inspection themselves or by accepting the Qualified Inspector's final inspection certification(s) required by the General Permit. The principal executive officer, ranking elected official, or duly authorized representative (see Part VI.J.) shall document their determination by signing the "MS4 Acceptance" statement on the NOT.

Sites are inspected based on the NYSDEC site inspection form, as well as against any standards pertaining to the unique features of the project site. These inspections are performed by the Code Enforcement Officer (Building and Codes Department) and/or the Stormwater Management Officer. In addition, the Town may request reports, site logbook, and other information as part of its investigation and enforcement activities to determine compliance if needed. If a site is not in compliance, and compliance is not reached within a reasonable time frame or if the condition worsens, a Stop Work Order is issued. Notices of Termination are filed at such a time that sites have reached final stabilization.

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

The Town utilizes Consultants (Town Designated Engineers) for many SWPPP reviews, and the Town Designated Engineers are well-educated about the MS4 program and work closely with the Town regarding any special circumstances. Site owner/operators are educated during Project Review Team (concept-level review), Planning Board, pre-Construction Meetings, and other preliminary site

review meetings with Town personnel. Municipal staff attends training and all relevant staff are made aware verbally or via e-mail of program requirements.

10. Ensures that construction site operators have received erosion and sediment control training before they do work within the covered entity's jurisdiction and maintain records of that training.

The Town requires proof of 4-hr certification from contractors working on sites disturbing one or more acres. This proof may be provided via a 4-hr certified trainer card or certificate and is maintained in the SWPPP file. Expired certifications must be renewed prior to the start of work.

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

These are noted under Minimum Control Measure 6, with several BMP sheets identified for various activities.

4.1 Measurable Goals

The Town of East Greenbush is assessing the success of Minimum Control Measure 4 of its SWMP through the following measurable goals:

Measurable Goals	Goal
Number of <i>SWPPPs</i> reviewed	Track annually and evaluate trends
Number and type of enforcement actions	0
Percent of active construction sites inspected once	100%
Percent of active construction sites inspected more than once	100%
Number of construction sites authorized for disturbances of one acre or more	Track annually and evaluate trends

5.0 Minimum Control Measure 5: Post-Construction Site Stormwater Runoff Control

The Post-Construction Site Stormwater Runoff Control element of the MS4 stormwater program is focused on ensuring built projects that disturb one acre or more do not cause or contribute to water quality violations. This program is designed to enable the MS4, through both programmatic and administrative (legal) mechanisms to:

- Inspect and maintain post-construction stormwater management practices
- Inventory new post-construction stormwater management practices

The Town of East Greenbush adopted the following program measures:

1. Provides equivalent protection to the General Permit.

Every project disturbing one or more acre is required to prepare a stormwater pollution prevention plan (SWPPP), which is reviewed against the standards set forth in the General Permit.

2. Addresses stormwater runoff to the small MS4 from 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 construction activity disturbing less than one acre must be included in the program if:

- that construction activity is part of a larger common plan of development or sale that would disturb one acre or more; or
- if controlling such activities in a particular watershed is required by the Department;

Every project disturbing one or more acre is required to prepare a SWPPP, which is reviewed against the standards set forth in the General Permit. Additionally, projects that disturb less than one acre but are part of a larger common plan of development or sale are also required to prepare a SWPPP. All post-construction stormwater management practices are inspected prior to final sign-off of the Notice of Termination.

The Town has a "Grading and Filling of Land and Erosion Control Local Law" which is applicable to disturbances of 1/2 ac or greater.

3. Includes a law, ordinance or other regulatory mechanism to require construction runoff controls from new development and re-development projects to the extent allowable under State law that meet the State's most current technical standards.

The Town has certified and implemented an Erosion and Sediment Control Law (Appendix F).

4. Includes a combination of structural or non-structural management practices (according to standards defined in the most current version of the NYS Stormwater management Design Manual) that will reduce the discharge of pollutants to the MEP.

The Town's Building Codes, Overlay Districts, Zoning Code, Comprehensive Plan, and Local Laws, and Land Use Regulation/Zoning are used to implement Low Impact Development, Better Site Design, and Green Infrastructure Principles as language within each permits.

5. Describes procedures for SWPPP review with consideration of potential water quality impacts and review of individual SWPPPs to ensure consistency with state and local post-construction stormwater requirements;

All projects that disturb one (1) acre or more are required to prepare a SWPPP for review. SWPPPs are reviewed by the Town's Designated Engineers, who are qualified via training and continuing education to review hydrologic and hydraulic calculations, stormwater management design, and general site design among other elements of projects. The Town Designated Engineer provides a summary of comments and observations to the Town for review and consideration.

6. Maintain an inventory of post-construction stormwater management practices within the covered entities jurisdiction.

The Town's inventory, which is maintained in an electronic database, includes location of practice and type of practice. The Town also keeps a copy of required maintenance guidelines per the NYS Stormwater Management Design Manual (Appendix H) and a log of dates and type of maintenance performed (Appendix I).

7. Ensures adequate long-term operation and maintenance of management practices identified by trained staff, including inspection to ensure that practices are performing properly.

The Stormwater Management Officer is provided with the proper inspection forms for each permanent stormwater management practice prior to inspection. Questions or issues that cannot be answered by the SMO are directed to the Town Designated Engineer(s).

5.1 Measurable Goals

The Town of East Greenbush is assessing the success of Minimum Control Measure 5 of its SWMP through the following measurable goals:

Measurable Goals	Goal
Number of <i>SWPPPs</i> reviewed	Track annually and evaluate trends
Number and type of enforcement actions	0
Number and type of post-construction stormwater management practices inventoried	100%
Number and type of post-construction stormwater management practices inspected	100% every three years
Number and type of post-construction stormwater management practices maintained	Track annually and evaluate trends

6.0 Minimum Control Measure 6: Good Housekeeping/Pollution Prevention

The General Permit requires covered entities to develop and implement a Good Housekeeping/Pollution Prevention program to address sources of potential stormwater pollution from municipal facilities and activities. Specifically, the permit requires that this plan:

- Addresses municipal operations and facilities that contribute or potentially contribute POCs to the small MS4 system. The operations and facilities may include, but are not limited to: street and bridge maintenance, winter road maintenance, stormwater system maintenance, vehicle and fleet maintenance, park and open space maintenance, municipal building maintenance, solid waste management, new construction and land disturbances, right-of-way maintenance, marine operations, hydrologic habitat modification, or other. In addition to the Self Assessments and Best Management Practices provided in Appendices I & J, the Town has prepared a customized Operations Manual for Municipal Separate Stormwater System (MS-4), dated April 25, 2018 which is kept on file within the DPW.
- At a minimum frequency of once every three years, perform and document a self-assessment of all municipal operations addressed by the SWMP to:
 - Determine the sources of pollutants potentially generated by the 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.
- Determines management practices, policies, procedures, etc. that will be developed and implemented to reduce or prevent the discharge of (potential) pollutants. Refer to management practices identified in the NYS Pollution Prevention and Good Housekeeping Assistance Document and other guidance materials available from the EPA, State, or other organizations.
- Prioritizes pollution prevention and good housekeeping efforts based on geographic area, potential to improve water quality, facilities or operations most in need of modification or improvement, and covered entity's capabilities.
- Addresses pollution prevention and good housekeeping priorities.
- Includes an employee pollution prevention and good housekeeping training program and ensures that staff receive and utilize training.

- Requires third-party entities performing contracted services, including but not limited to street sweeping, snow removal, lawn/grounds care, etc., to meet permit requirements as the requirements apply to the activity performed.
- Implementation of the above noted provisions of the SWMP will ensure that the requirement of meeting “maximum extent practicable” is attained for discharges from those facilities.

Municipal facilities and operations have the potential to contain and produce pollutants. MCM 6 focuses on development and implementation of Best Management Practices to eliminate or minimize their introduction into the municipal separate storm sewer.

Permit requirements addressed by this plan include:

- An inventory and self-assessment of all municipal operations, facilities, and equipment to ensure implementation of best management practices that prevent stormwater pollution, completed at least once every three years;
- Establishment and implementation of policies and procedures for operations that have the potential to contribute to stormwater pollution;
- Implementation of best management practices to reduce and eliminate the discharge of pollutants from municipal operations and facilities to the MS4;
- Proper training of municipal employees in all aspects of the Pollution Prevention and Good Housekeeping program; and
- Policies to ensure that all third-party contractors comply with established Pollution Prevention and Good Housekeeping procedures and practices.

The Town of East Greenbush completes self-assessments of stormwater pollution prevention best management practices and strategies for its municipal operations/facilities at least once every three years. Self-assessments were most recently performed in 2018. A recommended form for completing the assessment, developed by the Stormwater Coalition of Monroe County for use and adaptation by the general public, as is included as Appendix J.

Appendix K contains a listing of policies, procedures, and management practices pertaining to the following areas of the Town of East Greenbush’s facilities (DPW Garage, Town Hall, Wastewater Treatment Plant, Transfer Station, Parks, and general DPW operations):

- Municipal Building Maintenance
- Park and Open Space Maintenance
- Street Maintenance

- Training
- Vehicle and Fleet Maintenance
- Solid Waste Management
- Stormwater System Maintenance

Appendix K includes the Town's standard Contractor Certification as well as all signed certifications and Appendix L includes training logs for municipal staff as training relates to this program.

Appendix A

Geographic Areas of Concern

(Minimum Control Measure 1)