Stormwater Management Program Plan (SWMP Plan)

BUFFALO
SEWER AUTHORITY

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

Effective Date: January 3, 2024
Expiration Date: January 2, 2029

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Buffalo Sewer Authority

Stormwater Management Program Contacts

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

Name: Regina Harris, E.I.T.

Title: Senior Engineer/ Stormwater Program Coordinator

Phone: 716-851-4664

Email: rharris@buffalosewer.org

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

Name: Rosaleen B. Nogle, P.E.

Title: Principal Sanitary Engineer

Phone: 716-851-4664

Email: rnogle@buffalosewer.org

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

Name: Regina Harris, E.I.T.

Title: Senior Engineer/ Stormwater Program Coordinator

Phone: 716-851-4664

Email: rharris@buffalosewer.org

To report illicit discharges in the **Buffalo Sewer Authority** contact:

Name: Elizabeth Scheeler

Title: Industrial Waste Administrator

Phone: 716-851-4664

Email: escheeler@buffalosewer.org

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To report **stormwater complaints related to construction activity** in the **Buffalo Sewer Authority** contact:

Name: Regina Harris, EIT, GIP

Title: Senior Engineer/ Stormwater Program Coordinator

Phone: 716-851-4664

Email: rharris@buffalosewer.org

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Alternative Implementation Agreements
Inventory of Other Entities Assisting with Implementation of SWMP Plan

List any entities assisting with any portion of the SWMP development, implementation, or enforcement.

Name of Entity	Permit Requirement
City of Buffalo DPW-Streets	Street Sweeping
WNY Stormwater Coalition	Public Outreach and Education

Although not included as an Appendix, Alternative Implementation Agreements are considered part of this SWMP Plan and are available by contacting the Stormwater Program Coordinator or Stormwater Management listed Officer on page 2 of this document.

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

A. MCM1 – Public Education and Outreach Program

The MS4 Operator must develop and implement an education and outreach program to increase public awareness of pollutant generating activities and behaviors. This MCM is designed to inform the public about the impacts of stormwater on water quality, the general sources of stormwater pollutants, and the steps the general public can take to reduce pollutants in stormwater runoff.

1. Development

Within three (3) years

a. Focus Areas

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

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

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

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

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

- Cayuga Creek, Middle, and minor tribs (0103-0017): Class B
- Eighteenmile Creek, Lower, minor tribs (0104-0030): Class B
- S. Branch Eighteenmile, Lower, and tribs (0104-0016): Class B
- Scajaquada Creek, Upper, and tribs (0101-0034): Class B
- Ellicott Creek, Lower, and tribs (0102-0018): Class B
- Grand Island, all tribs to Niagara R (0101-0011): Class B

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- Hampton Brook and Tribs (0104-0041): Class B
- Hyde Park Lake (0101-0030): Class B
- Tonawanda Creek, Middle, Main Stem (0101-0006): Class B

ii. Sewersheds for impaired waters
The surface waters listed below are identified as impaired in the New York State 2018 Section 303(d) List of Impaired/TMDL Waters and included in Appendix C of the MS4 General Permit (GP-0-24-001). The sewershed(s) discharging to the surface waters are focus areas for the education and outreach program in the **Buffalo Sewer Authority.**

Erie County

- Delaware Park Pond (0101-0026)
    - Phosphorus
- Scajaquada Creek, Lower, and tribs (0101-0023)
    - Fecal Coliform
    - Oils & Floating Sub.
    - Phosphorus
- Scajaquada Creek, Middle, and tribs (0101-0033)
    - Fecal Coliform
    - Oils & Floating Sub.
    - Phosphorus
- Scajaquada Creek, Upper, and tribs (0101-0034)
    - Fecal Coliform
    - Phosphorus

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

iv. Areas with construction activities:
Education will be targeted to specific construction sites/operators that are identified during Construction General Permit oversight and/or inspections as impacting water quality/generating stormwater pollutants. In addition, construction-related activities are an education and outreach topic for the following target audiences: contractors, developers, design professionals, and **Buffalo Sewer Authority** municipal staff.

v. Areas with on-site wastewater systems:
Education will be targeted to specific sewersheds that are identified during illicit discharge detection monitoring as discharging pathogens/fecal coliform. In addition, on-site wastewater treatment systems (i.e. septic systems) are an education and outreach topic for the residential target audience.

vi. Residential, commercial, and industrial areas
Education will take a variety of forms for these audiences. Residential/household education will include tabling at community and regional events, stormwater displays in the main municipal building, school-based programming such as the annual rain

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barrel painting contest, and classroom presentations. Commercial audiences will be targeted for education on topics most relevant to their primary operation (i.e. restaurants, landscaping and lawn care, mobile washers); industrial areas will be targeted for education on outdoor materials storage and other issues as they are discovered.

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

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

b. Target Audiences and Associated Pollutant Generating Activities

Within three (3) years

i. Residents: landscaping and lawn care; dog waste; household hazardous waste disposal; vehicle washing

ii. Commercial: Business owners and staff: landscaping and lawn care; vehicle fueling; vehicle service and maintenance; uncovered materials exposure/storage

iii. Institutions: Managers, staff, and students: uncovered materials exposure/storage (institutions not subject to SPDES MS4 Stormwater Permit)

iv. Construction: Developers, contractors, and design professionals: soil disturbance (erosion and sediment control); uncontained construction waste

v. Industrial: Owners and staff: uncovered materials exposure/storage (ONLY industry not subject to SPDES MSGP Stormwater Permit)

vi. MS4 Operator's municipal staff: uncovered materials exposure; preventative maintenance; spill prevention and response; erosion and sediment controls; managing vegetated areas and open space; salt storage; waste, garbage and floatable debris.

c. Education and Outreach Topics

Within three (3) years

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

Topic	**Target Audience**	**How Topic Reduces Potential for Pollutants to be Generated by Target Audience(s)**

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Household Guide	Residents	Addresses common household activities that contaminate stormwater and how to prevent
Rain Garden How-To-Guide	Residents	Reduces stormwater runoff and potential to carry pollutants to the MS4
Your Septic System	Residents, MS4 staff	Addresses proper use and maintenance of septic systems to ensure they are functioning as designed
Pet Waste	Residents, MS4 staff	Addresses the importance of cleaning up and proper disposal of pet waste to ensure pathogens are not exposed to runoff
Illicit Discharge Citizen's Guide	Residents, MS4 staff	Provides information on storm sewers, illicit discharges, how to recognize them and where to report the incident
Stormwater Ponds	Residents, MS4 staff, Commercial sites, HOAs	Provides information on stormwater ponds, their purpose and maintenance.
DIY Rain Barrel & Home Composting	Residents	Reduces stormwater runoff, use of lawn care chemicals and potential to carry pollutants to the MS4
Rain Barrel Use/Installation	Residents	Reduces stormwater runoff and potential to carry pollutants to the MS4
Litter in Waterways	Residents, MS4 staff	Addresses how litter pollutes and impacts local waterways
Moving Dirt/Soil Disturbance/ Construction General Permit	Contractors, developers, MS4 staff	Addresses soil disturbance, the CGP, and importance of erosion and sediment control

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d. Illicit Discharge Education

Within six (6) months

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

i. Municipal employees: email announcement

ii. Businesses: municipal web page; public library

iii. Public: municipal web page; public library

2. Implementation and Frequency

a. Distribution Method of Educational Messages

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

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

b. Frequency

Once every 5 years the **Buffalo Sewer Authority** directs an educational message to each target audience(s) for each focus area(s) based on the defined education and outreach topic(s) listed in this Stormwater Management Program Plan; and documents the date of completion and method of distribution for each message.
Compliance documentation is listed in Appendix B.

c. Updates to the Public Education and Outreach Program

Annually by April 1: The **Buffalo Sewer Authority** reviews and updates if necessary the focus areas target audiences and/or education and outreach topics.
Compliance documentation is listed in Appendix B.

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B. MCM 2 - Public Involvement/Participation

The MS4 Operator must provide opportunities to involve the public in the development review and implementation of the SWMP. This MCM is designed to give the public the opportunity to include their opinions in the implementation of this SPDES general permit.

1. Public Involvement/Participation

Public involvement/participation in the development and implementation of the **Buffalo Sewer Authority's** Stormwater Management Program includes opportunities to: review the SWMP Plan; submit comments; ask questions; and become involved in the SWMP.

The **Buffalo Sewer Authority** informs the public of the opportunity they have to review the SWMP Plan; submit comments; ask questions; and become involved in the SWMP via the following avenues of communication:

- Citizen advisory group on stormwater management
- Public hearings or meetings
- Coordination with other pre-existing public involvement/participation opportunities
- Reporting concerns about activities or behaviors observed

Methods of distribution used to inform public of opportunity:

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

Compliance documentation is listed in Appendix B.

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

Name: Regina Harris E.I.T.

Title: Senior Engineer/ Stormwater Program Coordinator

Phone: 716-851-4664

Email: rharris@buffalosewer.org

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

2. Public Notice and Input Requirements

a. Public Notice and Input Requirements for SWMP Plan

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

b. Public Notice and Input Requirements for Draft Annual Report

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Annually, provide an opportunity for the public to review and comment on the draft Annual Report. Document the opportunity below.

1. For public review and comment, the draft Annual Report will be posted on the **Buffalo Sewer Authority** website: **www.buffalosewer.org/about/transparency**. The website includes information on the timeframes and procedures to submit comments and/or request a meeting. If a public meeting is requested by two or more persons, the MS4 Operator must hold such a meeting.

Compliance documentation is listed in Appendix B.

c. Consideration of Public Input

Annually, the **Buffalo Sewer Authority** documents a summary of comments received on the SWMP Plan and draft Annual Report.

Compliance documentation is listed in Appendix B.

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C. MCM 3 - Illicit Discharge Detection and Elimination

The **Buffalo Sewer Authority** has a program to systematically detect illicit discharges to its municipal separate storm sewer system (MS4), track down the source of the illicit discharge, and eliminate it. This program is designed to manage the MS4 so it is not conveying pollutants associated with flows other than those directly attributable to stormwater runoff. The **Buffalo Sewer Authority** Illicit Discharge Detection and Elimination Program is supported by Local law, "Model Local Law to Prohibit Illicit Discharges, Activities and Connections to Separate Storm Sewer Systems".

1. Illicit Discharge Detection

a. Public Reporting of Illicit Discharges

i. To report illicit discharges in the **Buffalo Sewer Authority** contact:

Contact: Elizabeth Scheeler

Phone: 716-851-4664

Email: escheeler@buffalosewer.org

-or-

Contact: Rosaleen Nogle, P.E.

Phone: 716-851-4664

Email: rnogle@buffalosewer.org

ii. Within thirty (30) days of an illicit discharge, each report of an illicit discharge is documented in the **Buffalo Sewer Authority** SWMP Plan.

Compliance documentation is listed in Appendix B.

b. Monitoring Locations

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

i. **MS4 outfalls**: Any point of stormwater discharge from pipes, ditches, and swales, as well as other points of concentrated flow, to surface waters of New York State from the **Buffalo Sewer Authority** municipal separate storm sewer system (MS4).

ii. **Interconnections**: Any point of stormwater discharge from pipes, ditches, and swales, as well as other points of concentrated flow, to another MS4 or private storm sewer system.

iii. Municipal facility **intraconnections**: Any point where stormwater is conveyed from a municipal facility property to its own MS4. This is the most down-drainage end of the MS4 infrastructure located on the municipal facility prior to discharge to the MS4.

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c. Monitoring Locations Inventory

The **Buffalo Sewer Authority** maintains an inventory of monitoring locations that are within the boundaries of its MS4 Regulated area (see Appendix A). The inventory is available for public review and comment as follows:

- Appendix B (**IF** your inventory is small enough to include)
- Upon request: contact the Stormwater Program Coordinator or Stormwater Management Officer listed on page 2 of this document
- On the **Buffalo Sewer Authority** webpage: **www.buffalosewer.org/about/transparency**
- At the **Buffalo Sewer Authority** office in City Hall room 1038 as follows:
    - Hardcopy: Engineering Department
    - Electronically:
        - Public: Upon Request
        - Internally: J:\Engineer\Stormwater\MS4 Compliance

For each monitoring location, the following information is included:

a) Inventory information for MS4 outfalls
- ID;
- Prioritization (high or low);
- Type of monitoring location;
- Name of MS4 Operator's municipal facility, if located at a municipal facility;
- Receiving waterbody name and class;
- Receiving waterbody WI/PWL Segment ID;
- Land use in drainage area;
- Type of conveyance (open drainage or closed pipe);
- Material;
- Shape;
- Dimensions;
- Submerged in water; and
- Submerged in sediment.

b) Inventory information for interconnections
- ID;
- Prioritization (high or low);
- Type of monitoring location;
- Name of MS4 Operator receiving discharge or private storm system;
- Name of MS4 Operator's municipal facility, if located at a municipal facility; and
- Receiving waterbody name and class.

c) Inventory information for municipal facility intraconnections
- ID;
- Prioritization (high or low);
- Type of monitoring location;

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- Name of MS4 Operator's municipal facility; and
- Receiving waterbody name and class.

ii. Annually, the **Buffalo Sewer Authority** updates the inventory if monitoring locations are constructed or discovered; or if information for existing monitoring locations change. Prioritization determinations and updates, as noted below, are also addressed in the update.

Compliance documentation pertaining to updating the monitoring locations inventory is listed in Appendix B.

d. Monitoring Locations Prioritization

i. The **Buffalo Sewer Authority** prioritizes its monitoring locations which are included in the monitoring locations inventory as follows:

a) High priority monitoring locations are as follows:

- At a high priority municipal facility, defined as a municipal facility that has one or more of the following on site and exposed to stormwater:
  - Storage of chemicals, salt, petroleum, pesticides, fertilizers, antifreeze, lead-acid batteries, tires, waste/debris;
  - Fueling stations; and/or
  - Vehicle or equipment maintenance/repair.
- Discharging to impaired waters;
- Discharging within a TMDL watershed (Not applicable in the **Buffalo Sewer Authority**);
- Directly discharging to waters with Class AA-S, A-S, AA, A, B, SA, or SB; and/or
- Confirmed citizen complaints on three or more separate occasions in the last twelve (12) months.

b) All other monitoring locations are considered low priority.

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

iii. Annually, the **Buffalo Sewer Authority** updates the monitoring location prioritization in the inventory based on information gathered as part of the monitoring location inspection and sampling program.

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

e. Monitoring Locations Inspection and Sampling Program

The **Buffalo Sewer Authority** has a program to inspect monitoring locations and sample dry weather flow discharging from the MS4.

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

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a) During dry weather, one (1) inspection of each monitoring location identified in the inventory every five (5) years;

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

- Upon request: contact the Stormwater Program Coordinator or Stormwater Management Officer listed on page 2 of this document

- At the **Buffalo Sewer Authority** in City Hall room 1038 as follows:
  - Hardcopy: Engineering Department
  - Electronically:
    - Public: Upon Request
    - Internally: J:\Engineer\Stormwater\MS4 Compliance

c) Following a monitoring location inspection, all inspections which resulted in a "suspect" or "obvious" illicit discharge characterization are subject to sampling unless the source of the illicit discharge is clear and discernable (e.g., sewage), in which case sampling is not necessary;

d) Sampling is conducted using field test strips and/or field instrumentation that are sufficiently sensitive to detect the parameter below the sampling action level used. As per the MS4 General Permit (Part VI.C.d), analytical methods are not subject to New York State's 40 CFR Part 136 requirements for approved methods and certified laboratories;

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

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

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

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

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

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

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

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

Compliance documentation is listed in Appendix B for:

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

2. Illicit Discharge Track Down Program

Within two (2) years

The **Buffalo Sewer Authority** has an illicit discharge track down program to identify the source of illicit discharges and the responsible party.

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

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

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

a) Within twenty-four (24) hours of discovery, or 72 hours of dry weather conditions, the **Buffalo Sewer Authority** will initiate track down procedures for flowing MS4 monitoring locations with obvious illicit discharges;

b) Within two (2) hours of discovery, the **Buffalo Sewer Authority** will initiate track down procedures for obvious illicit discharges of sanitary wastewater that would affect bathing areas during bathing season, shell fishing areas or public water intakes and report orally or electronically to the NYSDEC Regional Water Engineer and local health department; and

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c) Within five (5) days of discovery, or 72 hours of dry weather conditions, the **Buffalo Sewer Authority** will initiate track down procedures for suspect illicit discharges.

b. As noted above, the **Buffalo Sewer Authority,** in partnership with the Western NY Stormwater Coalition, has an employee training program addressing Illicit Discharge Detection and Elimination procedures. This training includes source track down. Requirements pertaining to employee training for existing staff, new staff and updates to the illicit discharge source track down procedures are identical.

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

d. Annually, by April 1, the **Buffalo Sewer Authority** reviews and updates its illicit discharge track down procedures.

Compliance documentation is listed in Appendix B for:

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

3. Illicit Discharge Elimination Program

Within two (2) years

The **Buffalo Sewer Authority** has an illicit discharge elimination program. Once an illicit discharge is track downed and a source identified, steps are taken to eliminate the source/discharge. As noted previously, the **Buffalo Sewer Authority** Illicit Discharge Detection and Elimination Program is supported by Local "Model Local Law to Prohibit Illicit Discharges, Activities and Connections to Separate Storm Sewer Systems".

- Although not included in this SWMP Plan, documentation of enforcement measures to eliminate illicit discharges is available upon request by contacting the Stormwater Program Coordinator or Stormwater Management Officer listed on page 2 of this document.

a. The illicit discharge elimination procedures including

i. Provisions for escalating enforcement and tracking enforcement actions are in the **Buffalo Sewer Authority** Enforcement Response Plan detailed in Appendix O;

ii. To confirm the corrective actions have been taken, the monitoring location will be inspected, and sampled if flowing, within 30 days of receiving notice that the source of contamination has been eliminated;

iii. Steps taken for illicit discharge elimination procedures; and

iv. Timeframes for illicit discharge elimination are as follows:

- Within twenty-four (24) hours of identification of an illicit discharge that

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has a reasonable likelihood of adversely affecting human health or the environment, the **Buffalo Sewer Authority** will eliminate the illicit discharge;
- Within five (5) days of identification of an illicit discharge that does not have a reasonable likelihood of adversely affecting human health or the environment, the **Buffalo Sewer Authority** will eliminate the illicit discharge; and
- Where elimination of an illicit discharge within the specified timeframes above is not possible, the **Buffalo Sewer Authority** will notify the NYSDEC Regional Water Engineer.

b. As noted above, the **Buffalo Sewer Authority,** in partnership with the Western NY Stormwater Coalition, has an employee training program addressing Illicit Discharge Detection and Elimination procedures. This training includes illicit discharge elimination procedures. General requirements pertaining to employee training for existing staff, new staff and updates to the illicit discharge elimination are identical.

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

d. Annually, by April 1, the **Buffalo Sewer Authority** reviews and updates the illicit discharge elimination procedures.

Compliance documentation is listed in Appendix B for:
- **Staff that have received illicit discharge elimination procedures training; and,**
- **Updates to the illicit discharge elimination procedures.**

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D. MCM 4 - Construction Site Stormwater Runoff Control

The **Buffalo Sewer Authority** has a program to ensure construction sites subject to the NYSDEC General Permit for Stormwater Discharges from Construction Activity (CGP) are effectively controlled. This program is designed to prevent pollution from construction related activities, as well as ensure for proper planning and installation of post-construction SMPs. The **Buffalo Sewer Authority** Construction Site Stormwater Runoff Control Program is supported by Local law:
(https://govt.westlaw.com/nycrr/Document/I5127d63ccd1711dda432a117e...)

1. Applicable Construction Activities/Projects/Sites

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

i. Result in a total land disturbance of greater than or equal to one acre; or

ii. Disturb less than one acre if part of a larger common plan of development or sale (even if additional development/phase is years away).

b. For construction activities where the Buffalo **Sewer Authority** is listed as the owner/operator on the Notice of Intent for coverage under the CGP. The **Buffalo Sewer Authority** will ensure its own compliance with the CGP. The additional requirements for Section 3: Construction Oversight; Section 6: SWPPP Review; Section 7: Pre-Construction Meeting; Section 8: Construction Site Inspection; and Section 9: Construction Close-Out below are not required.

2. Public Reporting of Construction Site Complaints

a. To report stormwater complaints related to construction in the **Buffalo Sewer Authority** contact:

Contact: Regina Harris, E.I.T.

Phone:716-851-4664

Email: rharris@buffalosewer.org

b. The **Buffalo Sewer Authority** documents reports of construction site complaints with the following information:

i. Date of the report;
ii. Location of the construction site;
iii. Nature of complaint;
iv. Follow up actions taken or needed; and
v. Inspection outcomes and any enforcement taken.

Although not included as an appendix, this documentation is considered part of the **Buffalo Sewer Authority** SWMP Plan. It is available for public review upon request; contact the Stormwater Program Coordinator or Stormwater Management Officer listed on page 2 of this document or internally: J:\Engineer\Stormwater\MS4 Compliance

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3. Construction Oversight Program

Within one (1) year of the EDC

The **Buffalo Sewer Authority** has a construction oversight program. It is important to note that the program encompasses the entire municipality, within and beyond the MS4 regulated area.

a. Construction oversight procedures in the **Buffalo Sewer Authority** are as follows:

i. The construction site stormwater control program applies to all construction sites that are subject to the NYSDEC General Permit for Stormwater Discharges from Construction Activity (GP-0-20-001);

ii. As per the NYSDEC General Permit for Stormwater Discharges from Construction Activity (GP-0-20-001), construction activities that require a Stormwater Pollution Prevention Plan (SWPPP) are listed in Appendix E;

iii. Procedures for submitting SWPPPs to the **Buffalo Sewer Authority** are as follows: The procedure for submitting SWPPPs can be found on the website www.buffalosewer.org/about/transparency;

iv. The **Buffalo Sewer Authority** reviews Stormwater Pollution Prevention Plans (SWPPPs) for all CGP-regulated constructed projects for conformance with NYS standards (Detailed below in Part 6: SWPPP Review);

v. Prior to commencement of CGP-regulated construction activity, the **Buffalo Sewer Authority** requires a pre-construction meeting (Detailed below in Part 7: Pre-Construction Meeting);

vi. The **Buffalo Sewer Authority** inspects CGP-regulated construction sites to ensure compliance with the conditions of the CGP and is authorized to escalate enforcement actions as is necessary by: https://govt.westlaw.com/nycrr/Document/I5127d63ccd1711dda432a117e... (Detailed below in Part 8: Construction Site Inspections);

vii. All CGP-regulated construction projects in the **Buffalo Sewer Authority** are subject to construction site close-out requirements in conformance with the CGP (Detailed below in Part 9: Construction site close-out);

viii. The **Buffalo Sewer Authority** follows an enforcement process that includes expectations for compliance for CGP-regulated construction sites that fail to comply with the conditions of the CGP and their SWPPP. See Appendix O for the Enforcement Response Plan. For information on enforcement actions pertaining to specific construction sites in the **Buffalo Sewer Authority** contact:

Contact: Rosaleen Nogle, P.E.

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Phone: 716-851-4664

Email: rnogle@buffalosewer.org

ix. Although not included in this SWMP Plan, documentation of enforcement measures addressing non-compliance with the Construction General Permit (GP-0-20-001) is available upon request by contacting the Stormwater Program Coordinator or Stormwater Management Officer listed on page 2 of this document.

x. Other procedures associated with the control of stormwater runoff from applicable construction activities.
Any other procedures associated with stormwater runoff can be found on the website www.buffalosewer.org/about/transparency.

b. The **Buffalo Sewer Authority,** in partnership with the Western NY Stormwater Coalition, has an employee training program addressing its Construction Site Stormwater Runoff Control Program. This training engages employees in a classroom setting, and as appropriate, a SWPPP compliance inspection at a construction site.

i) All new staff that are charged with conducting any construction oversight activities will receive training on procedures prior to doing so;

ii) All existing staff, that are charged with conducting any construction oversight activities will receive training on procedures prior to doing so, and, once every five (5) years, thereafter; and

iii) If the construction oversight procedures are updated, all staff will receive training on the updates prior to conducting construction oversight.

c. The names, titles, and contact information for the individuals who have received construction oversight training are updated annually;

d. All individuals involved in construction activity in the **Buffalo Sewer Authority** (e.g., contractor, subcontractor, qualified inspector, SWPPP reviewers) will be certified and maintain four (4) hours of NYSDEC endorsed training in proper erosion and sediment control principles by attending the NYSDEC 4-Hour Erosion and Sediment Control Training. This training is offered annually by Erie and Niagara County Soil and Water Conservation Districts, as well as online by other Soil and Water Conservation Districts across the state.

i) Individuals responsible for reviewing SWPPPs on behalf of the **Buffalo Sewer Authority** will maintain certification.

ii) In conformance with the NYS CGP, contractors, subcontractors and qualified inspectors will maintain certification throughout the project. Contractors and and subcontractors will include a current copy of their NYS certification in the on-site SWPPP.

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e. Annually, by April 1, the **Buffalo Sewer Authority** reviews and updates its construction oversight procedures.

Compliance documentation is listed in Appendix B for:

- **Staff that have received construction oversight training;**
- **Updates to the construction oversight procedures; and,**
- **NYSDEC 4-Hour Erosion and Sediment Control Training for individuals involved in construction activity**

4 Construction Site Inventory & Inspection Tracking

Within six (6) months of the EDC

a. The **Buffalo Sewer Authority** maintains an inventory of CGP-regulated construction sites that encompasses the entire municipality, within and beyond the MS4 regulated area. Although not included as an appendix, the inventory is considered part of the **Buffalo Sewer Authority** SWMP Plan. The inventory is available for public review and comment as follows:

- Upon request: contact Stormwater Program Coordinator or Stormwater Management Officer listed on page 2 of this document
    - At the **Buffalo Sewer Authority** office in City Hall room 1038, as follows Hardcopy: Engineering Department
    - Electronically:
        - Public: Upon Request
        - Internally: J:\Engineer\Stormwater\MS4 Compliance

The following information is included in the inventory:

- Location of the construction site;
- Owner/operator contact information, if other than the MS4 Operator;
- Receiving waterbody name and class;
- Receiving waterbody WI/PWL Segment ID;
- Prioritization (high or low);
- Construction project SPDES identification number;
- SWPPP approval date;
- Inspection history, including dates and ratings (satisfactory, marginal, or unsatisfactory, when available); and
- Current status of the construction site/project (i.e., active, temporarily shut down, complete).

b. Annually, the **Buffalo Sewer Authority** updates the inventory if construction projects are approved or completed.

5 Construction Site Prioritization

Within one (1) year

a. The **Buffalo Sewer Authority** prioritizes all CGP-regulated construction sites which are included in the construction site inventory as follows:

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i. High priority construction sites include construction sites:

a) With a direct conveyance (e.g., channel, ditch, storm sewer) to a surface water of the State:

i) Classified as impaired by silt/sediment, phosphorus, or nitrogen as the Pollutant of Concern;

- Delaware Park Pond (0101-0026)
  - Phosphorus
  - Fecal Coliform
- Scajaquada Creek, Lower, and tribs (0101-0023)
  - Fecal Coliform
  - Oils & Floating Sub.
  - Phosphorus
- Scajaquada Creek, Middle, and tribs (0101-0033)
  - Fecal Coliform
  - Oils & Floating Sub.
  - Phosphorus
- Scajaquada Creek, Upper, and tribs (0101-0034)
  - Fecal Coliform
  - Phosphorus

ii) Classified as AA-S, AA, or A; or

- Lake Erie Class A-S
- Niagara River Class A-S

b) With greater than five (5) acres of disturbed earth at any one time;

c) With earth disturbance within one hundred (100) feet of any lake or pond; and/or

d) Within fifty (50) feet of any rivers or streams.

ii. All other construction sites are considered low priority.

b. All CGP-regulated construction sites are prioritized within thirty (30) days of becoming active; and

c. Annually, after the initial prioritization, the **Buffalo Sewer Authority** updates the construction site prioritization in the inventory based on information gathered as part of the construction oversight.

i. If the prioritization of the construction site changes priority based on information gathered as part of the construction oversight program, the MS4 Operator must comply with the requirements that apply to that prioritization.

As noted above, the CGP-regulated construction sites inventory is available for public review and comment as follows:

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- Upon request: contact Stormwater Program Coordinator or Stormwater Management Officer listed on page 2 of this document

    - At the **Buffalo Sewer Authority** office in City Hall room 1038, as follows:
        - Hardcopy: (Engineering Department)
        - Electronically:
            - Public: Upon Request
            - Internally: J:\Engineer\Stormwater\MS4 Compliance

6. SWPPP Review

a. All individual(s) responsible for reviewing SWPPPs for acceptance will complete four (4) hours of NYSDEC endorsed training in proper erosion and sediment control principles by attending the NYSDEC 4-Hour Erosion and Sediment Control Training. This training is offered annually by Erie and Niagara County Soil and Water Conservation Districts, as well as online by other Soil and Water Conservation Districts across the state. This training will be completed within three (3) years of the EDC and every three (3) years thereafter to maintain active certification.

b. SWPPP reviewers for the **Buffalo Sewer Authority** receive this training prior to conducting SWPPP reviews for acceptance.

i. Individuals without these trainings cannot review SWPPPs for acceptance.

ii. Individuals who meet the definition of a qualified professional or qualified inspector are exempt from this requirement.

c. To ensure individuals responsible for reviewing SWPPPs review all SWPPPs for applicable construction activities and for conformance with the requirements of the CGP, the NYSDEC SWPPP Review Checklist will be utilized (Appendix F). SWPPP reviews will include the following:

i. Erosion and sediment controls will be reviewed for conformance with the NYS Standards and Specifications for Erosion and Sediment Control 2016, or equivalent;

ii. Individuals responsible for review of post-construction SMPs must be qualified professionals or under the supervision of a qualified professional; and

iii. Post-construction SMPs must be reviewed for conformance with the NYS Stormwater Management Design Manual (NYS SWMDM) 2015 or equivalent, including:

- All post-construction SMPs must meet the sizing criteria contained in the CGP and NYS SWMDM 2015.

- Deviations from the performance criteria of the NYS SWMDM 2015 must demonstrate that they are equivalent.

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- The SWPPP must include an Operation & Maintenance Plan that includes inspection and maintenance schedules and actions to ensure continuous and effective operation of each post-construction SMP. The SWPPP must identify the entity that will be responsible for the long-term operation and maintenance of each practice.

Compliance documentation is listed in Appendix B for:

- **Staff involved in SWPPP reviews that have received NYSDEC 4-Hour Erosion and Sediment Control Training**

d. Although not included as an appendix, SWPPP reviews, as documented by the NYSDEC SWPPP Review Checklist, are considered part of the **Buffalo Sewer Authority** SWMP Plan. The SWPPP reviews are available for public review and comment as follows:

- Upon request: contact Stormwater Program Coordinator or Stormwater Management Officer listed on page 2 this document

- At the **Buffalo Sewer Authority** office in City Hall room 1038, as follows:
  - Hardcopy: (Engineering Department)
  - Electronically:
    - Public: Upon Request
    - Internally: J:\Engineer\Stormwater\MS4 Compliance

e. As new construction activities are added to the construction site inventory, they will be prioritized as noted previously; and

f. The **Buffalo Sewer Authority** will notify construction site owner/operators that their SWPPP has been accepted using the MS4 SWPPP Acceptance Form created by the Department and required by the CGP, signed in accordance with Part X.J: Signatories and Certifications (MS4 General Permit: GP-0-24-001).

7. Pre-Construction Meeting

Prior to commencement of construction activities, the **Buffalo Sewer Authority** requires a pre-construction meeting. The date and content of the preconstruction inspection/meeting is documented in the construction site inventory of this SWMP Plan. The owner/operator listed on the CGP NOI, the **Buffalo Sewer Authority**, contractor(s) responsible for implementing the SWPPP for the construction activity, and the qualified inspector (if required for the construction activity) must attend the meeting in order to:

a. Confirm the approved project has received, or will receive[26], coverage under the CGP or an individual SPDES permit;

b. Verify contractors and subcontractors selected by the owner/operator of the construction activity have identified at least one individual that has received four (4) hours of Department endorsed training in proper erosion and sediment control principles from a Soil & Water Conservation District or other endorsed entity as required by the CGP; and, a copy of the certification(s) for those individuals is added to the on-site SWPPP.

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c. Verify each of the contractors and subcontractors identified have signed a copy of the following certification statement below <u>before they commence any construction activity:</u>

> "I hereby certify under penalty of law that I understand and agree to comply with the terms and conditions of the SWPPP and agree to implement any corrective actions identified by the *qualified inspector* during a site inspection. I also understand that the *owner or operator* must comply with the terms and conditions of the most current version of the New York State Pollutant Discharge Elimination System ("SPDES") general permit for stormwater *discharges* from *construction activities* and that it is unlawful for any person to cause or contribute to a violation of *water quality standards*. Furthermore, I am aware that there are significant penalties for submitting false information, that I do not believe to be true, including the possibility of fine and imprisonment for knowing violations"

In addition to providing the certification statement above, the certification page must also identify the following:

- Specific elements of the SWPPP that each contractor and subcontractor will be responsible for, and include the name and title of the person providing the signature;
- The name and title of the *trained contractor* responsible for SWPPP implementation;
- The name, address and telephone number of the contracting firm;
- The address (or other identifying description) of the site; and
- The date the certification statement is signed.

The owner or operator of the Construction General Permit must attach the certification statement(s) to the copy of the SWPPP that is maintained at the construction site. If new or additional contractors are hired to implement measures identified in the SWPPP after construction has commenced, they must also sign the certification statement and provide the information listed above.

d. Review the construction oversight program and expectations for compliance.

8. Construction Site Inspections

The **Buffalo Sewer Authority** inspects CGP-regulated construction sites to ensure they are in compliance with the SWPPP that pertains to the site.

a. All individual(s) responsible for construction site inspection will complete four (4) hours of NYSDEC endorsed training in proper erosion and sediment control principles by attending the NYSDEC 4-Hour Erosion and Sediment Control Training. This training is offered annually by Erie and Niagara County Soil and Water Conservation

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Districts, as well as online by other Soil and Water Conservation Districts across the state. This training will be completed every three (3) years thereafter to maintain active certification.

b. All MS4 Construction Site Inspectors will receive this training prior to conducting construction site inspections.
i. Individuals without these trainings cannot inspect construction sites.

ii. Individuals who meet the definition of a qualified professional or qualified inspector are exempt from this requirement.

c. All sites with construction activity identified in the inventory will be inspected annually during active construction, after the pre-construction meeting, or sooner if deficiencies are noted that require attention.
    i. Follow up to construction site inspections must confirm corrective actions are completed within timeframes established by the CGP and the MS4 Operator's Enforcement Response Plan.

d. The names, titles, and contact information for the individuals who have received the NYSDEC 4-Hour Erosion and Sediment Control Training are updated annually;

e. All construction inspections are documented using the NYSDEC Construction Site Inspection Report Form (Appendix G) or an equivalent form containing the same information. The completed Construction Site Inspection Reports are considered part of the **Buffalo Sewer Authority** SWMP Plan and are available as follows:

- Upon request: contact Stormwater Program Coordinator or Stormwater Management Officer listed on page 2 of this document

- At the **Buffalo Sewer Authority** office in City Hall room 1038, as follows:
    - Hardcopy: Engineering Department
    - Electronically:
        - Public: Upon Request
        - Internally: J:\Engineer\Stormwater\MS4 Compliance

Compliance documentation is listed in Appendix B for:

- **Staff conducting construction inspections that have received NYSDEC 4-Hour Erosion and Sediment Control Training**

9. Construction Site Close-out

a. To close out a CGP-regulated construction site, the **Buffalo Sewer Authority** conducts and documents a final construction site inspection. The final construction site inspection is documented using the Construction Site Inspection Report Form (Appendix G), or an equivalent form containing the same information, or accept the construction site owner/operator's qualified inspector final inspection certification that is required by the CGP. The completed (final) Construction Site Inspection

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Reports are considered part of the **Buffalo Sewer Authority** SWMP Plan and are available as follows:

- Upon request: contact Stormwater Program Coordinator or Stormwater Management Officer listed on page 2 of this document

- At the **Buffalo Sewer Authority** office in City Hall room 1038, as follows:
    - Hardcopy: Engineering Department
    - Electronically:
        - Public: Upon Request
        - Internally: J:\Engineer\Stormwater\MS4 Compliance

b. The Notice of Termination (NOT) is signed by the **Buffalo Sewer Authority** as required by the CGP for projects determined to be complete. The NOT is signed in accordance with Part X.J: Signatories and Certifications (MS4 General Permit: GP-0-24-001).

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E. MCM 5 – Post-Construction Stormwater Management

The **Buffalo Sewer Authority** has a program to ensure proper operation and maintenance of post-construction Stormwater Management Practices (SMPs) for new or redeveloped sites. This program is designed to promote the long-term performance of post-construction SMPs in removing pollutants from stormwater runoff. The **Buffalo Sewer Authority** Post-Construction Stormwater Management Program is supported by Local law: https://govt.westlaw.com/nycrr/Document/I5127d63ccd1711dda432a117e...

1. Applicable Post-Construction SMPs

The **Buffalo Sewer Authority** post-construction SMP program addresses stormwater runoff to the MS4 from publicly owned/operated and privately owned/operated post-construction SMPs that meet the following:

a. Post-construction SMPs that have been installed as part of any CGP regulated construction site or individual SPDES permit since March 10, 2003; and

b. All new post-construction SMPs constructed as part of the construction site stormwater runoff control program.

2. Post-Construction SMP Inventory & Inspection Tracking

The **Buffalo Sewer Authority** maintains an inventory of post-construction SMPs that encompasses the entire municipality, within and beyond the MS4 regulated area.

a. The **Buffalo Sewer Authority** under its continuing MS4 General Permit coverage:

i. Maintains the inventory from previous iterations of the MS4 General Permit requirement for post-construction SMPs installed after March 10, 2003; and

ii. Will update the inventory for post-construction SMPs installed after March 10, 2003 as post-construction SMPs are approved or discovered; or after an owner/operator of CGP-regulated construction activity has filed a NOT with the NYSDEC.

b. Annually, the **Buffalo Sewer Authority** updates the inventory of post-construction SMPs to include the post-construction SMPs as noted above.

c. Within five (5) years

The following information will be included in the inventory either by using **Buffalo Sewer Authority** maintenance records or by verification of maintenance records provided by the owner of the post-construction SMP:

i. Street address or tax parcel;

ii. Type;

iii. Receiving waterbody name and class;

iv. Receiving waterbody WI/PWL Segment ID

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v. Date of installation (if available) or discovery;

vi. Ownership;

vii. Responsible party for maintenance;

viii. Contact information for party responsible for maintenance;

ix. Location of documentation depicting O&M requirements and legal agreements for post-construction SMP;

x. Frequency for inspection of post-construction SMP, as specified in the New York State Department of Environmental Conservation Maintenance Guidance: Stormwater Management Practices, March 31, 2017 (NYS DEC Maintenance Guidance 2017) or as specified in the O&M plan contained in the approved SWPPP;

xi. Reason for installation (e.g., new development, redevelopment, retrofit, flood control), if know

xii. Date of last inspection;

xiii. Inspection results; and

xiv. Any corrective actions identified and completed.

d. Although the **Buffalo Sewer Authority** inventory of post-construction SMPs is considered part of this SWMP Plan and is available as follows:

- Upon request: contact Stormwater Program Coordinator or Stormwater Management Officer listed on page 2 of this document

- At the **Buffalo Sewer Authority** office in City Hall room 1038, as follows:
    - Hardcopy: Engineering Department
    - Electronically:
        - Public: Upon Request
        - Internally: J:\Engineer\Stormwater\MS4 Compliance

3. SWPPP Review

As noted above, post-construction SMP SWPPP review requirements address the following:

a. Individuals responsible for review of post-construction SMPs must be qualified professionals or under the supervision of a qualified professional; and

b. Post-construction SMPs must be reviewed for conformance with the NYS Stormwater Management Design Manual (NYS SWMDM) 2015 or equivalent, including:

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i. All post-construction SMPs must meet the sizing criteria contained in the CGP and NYS SWMDM 2015.

ii. Deviations from the performance criteria of the NYS SWMDM 2015 must demonstrate that they are equivalent.

c. The SWPPP must include an O&M plan that includes inspection and maintenance schedules and actions to ensure continuous and effective operation of each post-construction SMP. The SWPPP must identify the entity that will be responsible for the long-term operation and maintenance of each practice.

4. Post-Construction SMP Inspection & Maintenance Program

Within one (1) year

The **Buffalo Sewer Authority** has an inspection and maintenance program for publicly owned/operated and privately owned/operated post-construction SMPs.

a. The post-construction SMP inspection and maintenance procedures are as follows:

i. All post-construction SMPs identified in the inventory are inspected at the frequency specified in the NYSDEC Maintenance Guidance 2017 or as specified in the O&M plan contained in the approved SWPPP, if available;

ii. The Post-Construction SMP Inspection Checklist in the NYSDEC Maintenance Guidance or an equivalent form containing the same information must be used to document post-construction SMP inspections. The **Buffalo Sewer Authority** will only accept Level 1 inspections (NYS DEC Maintenance Guidance 2017) by private owners inspecting post-construction SMPs. Level 2 and Level 3 inspections must be performed by qualified individuals as indicated in the checklist document.

The completed Post-Construction SMP Inspection Checklists are considered part of this SWMP Plan and are available as follows:

- Upon request: contact Stormwater Program Coordinator or Stormwater Management Officer listed on page 2 of this document

- At the **Buffalo Sewer Authority** municipal building as follows:
  - Hardcopy: Engineering Department
  - Electronically:
    - Public: Upon Request
    - Internally: J:\Engineer\Stormwater\MS4 Compliance

iii. Upon receipt of a completed inspection checklist, the **Buffalo Sewer Authority** will inform the owner that follow-up actions indicated on the checklist (i.e. maintenance, repair, or higher level inspection) must occur within thirty (30) days of the post-construction SMP inspection; and

iv. The **Buffalo Sewer Authority** will initiate enforcement within sixty (60) days of the inspection if follow-up actions are not complete. See Appendix O Enforcement Response Plan for course of action.

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v. Although not included in this SWMP Plan, documentation of enforcement measures pertaining to inspection and maintenance of post-construction stormwater management practices is available upon request by contacting the Stormwater Program Coordinator or Stormwater Management Officer listed on page 2 of this document.

b. The **Buffalo Sewer Authority,** in partnership with the Western NY Stormwater Coalition, has an employee training program addressing its post-construction SMP inspection and maintenance procedures. This training utilizes the NYSDEC Maintenance Guidance and includes a classroom setting, followed by a post-construction SMP inspection.

i) All new staff that are charged with conducting post-construction SMP inspection and maintenance activities will receive training on procedures prior to doing so;

ii) All existing staff, that are charged with conducting any post-construction SMP inspection and maintenance activities will receive training on procedures prior to doing so, and, once every five (5) years, thereafter; and

iii) If the post-construction SMP inspection and maintenance procedures are updated, all staff will receive training on the updates prior to conducting post-construction SMP inspection and maintenance.

iv) All inspectors will meet minimum qualifications for Level 1, 2, 3 inspections as per the NYSDEC Maintenance Guidance document (2017).

c. The names, titles, and contact information for the individuals who have received post-construction SMP inspection and maintenance procedures training are updated annually;

d. Annually, by April 1, the **Buffalo Sewer Authority** reviews and updates its post-construction SMP inspection and maintenance procedures.

Compliance documentation is listed in Appendix B for:

- **Staff that have received post-construction SMP inspection and maintenance procedures training; and,**
- **Updates to the post-construction SMP inspection and maintenance procedures.**

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F. MCM 6 – Pollution Prevention and Good Housekeeping

The **Buffalo Sewer Authority** has a pollution prevention and good housekeeping program for municipal facilities and municipal operations to minimize pollutant discharges. This MCM is designed to ensure the **Buffalo Sewer Authority**'s own activities do not contribute pollutants to surface waters of the State.

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

Within three (3) years

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

a. Minimize Exposure

i. Exposure of materials to rain, snow, snowmelt, and runoff must be minimized, unless not technologically possible or not economically practicable and achievable in light of best industry practices, including areas used for loading and unloading, storage, disposal, cleaning, maintenance, and fueling operations, with the following BMPs:

a) Locate materials and activities inside or protect them with storm resistant coverings;

b) Use grading, berming, or curbing to prevent runoff of contaminated flows and divert run-on away from these areas;

c) Locate materials, equipment, and activities so leaks and spills are contained in existing containment and diversion systems;

d) Clean up spills and leaks promptly using dry methods (e.g., absorbents) to prevent the discharge of pollutants;

e) Store leaky vehicles and equipment indoors or, if stored outdoors, use drip pans and absorbents;

f) Use spill/overflow protection equipment;

g) Perform all vehicle and/or equipment cleaning operations indoors, under cover, or in bermed areas that prevent runoff and run-on and also captures any overspray;

h) Drain fluids, indoors or under cover, from equipment and vehicles that will be decommissioned, and, for any equipment and vehicles that will remain unused for extended periods of time, inspect at least monthly for leaks; and/or

i) Minimize exposure of chemicals by replacing with a less toxic alternative (e.g., use non-hazardous cleaners).

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ii. No Exposure Certification for High Priority Municipal Facilities

a) Municipal facilities may qualify for No Exposure Certification (Appendix H) when all activities and materials are completely sheltered from exposure to rain, snow, snowmelt and/or runoff.

b) High priority municipal facilities with uncovered parking areas for vehicles awaiting maintenance may be considered a low priority municipal facility if only routine maintenance is performed inside and all other no exposure criteria are met. Details on high/low priority municipal facilities are addressed later in this section.

c) Municipal facilities accepting or repairing disabled vehicles and/or vehicles that have been involved in accidents are not eligible for the No Exposure Certification.

d) Municipal facilities must maintain the No Exposure Certification and document in the SWMP Plan. The No Exposure Certification ceases to apply when activities or materials become exposed.

b. Follow a Preventive Maintenance Program

i. The **Buffalo Sewer Authority** has a preventative maintenance program that includes routine inspection, testing, maintenance, and repair of all fueling areas, vehicles and equipment and systems to prevent leaks, spills and other releases.
This includes:

a) Performing inspections and preventive maintenance of stormwater drainage, source controls, treatment systems, and plant equipment and systems;

b) Maintaining non-structural BMPs (e.g., keep spill response supplies available, personnel appropriately trained, containment measures, covering fuel areas); and

c) Ensuring vehicle washwater is not discharged to the MS4 or to surface waters of the State. Washing equipment/vehicles in a designated and/or covered area where washwater is collected to be recycled or discharged to the sanitary sewer is required.

ii. Routine maintenance is performed to ensure BMPs are operating properly.

iii. When a BMP is not functioning to its designed effectiveness and needs repair or replacement:

a) Maintenance is performed before the next anticipated storm event, or as necessary to maintain the continued effectiveness of stormwater controls. If maintenance prior to the next anticipated storm event is impracticable, maintenance must be scheduled and accomplished as soon as practicable; and

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b) Interim measures are taken to prevent or minimize the discharge of pollutants until the final repair or replacement is implemented, including cleaning up any contaminated surfaces so that the material will not be discharged during subsequent storm events.

c. Spill Prevention and Response Procedures

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

a) Store materials in appropriate containers;

b) Label containers (e.g., "Used Oil," "Spent Solvents," "Fertilizers and Pesticides") that could be susceptible to spillage or leakage to encourage proper handling and facilitate rapid response if spills or leaks occur;

c) Implement procedures for material storage and handling, including the use of secondary containment and barriers between material storage and traffic areas, or a similarly effective means designed to prevent the discharge of pollutants from these areas;

d) Develop procedures for stopping, containing, and cleaning up leaks, spills, and other releases. As appropriate, execute such procedures as soon as possible;

e) Keep spill kits on-site, located near areas where spills may occur or where a rapid response can be made;

f) Develop procedures for notification of the appropriate facility personnel, emergency response agencies, and regulatory agencies when a leak, spill, or other release occurs. If possible, one of these individuals should be a member of the stormwater pollution prevention team. Any spills must be reported in accordance with 6 NYCRR 750-2.7; and

g) Following any spill or release, the MS4 Operator must evaluate the adequacy of the BMPs identified in the municipal facility specific SWPPP. If the BMPs are inadequate, the SWPPP must be updated to identify new BMPs that will prevent reoccurrence and improve the emergency response to such releases.

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

iii. This SPDES general permit does not relieve the **Buffalo Sewer Authority** of any reporting or other requirements related to spills or other releases of petroleum or

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hazardous substances. Any spill of a hazardous substance must be reported in accordance with 6 NYCRR 597.4. Any spill of petroleum must be reported in accordance with 6 NYCRR 613.6 or 17 NYCRR 32.3.

d. Erosion and Sediment Controls[31]

i. Stabilize exposed areas and control runoff using structural and/or nonstructural controls to minimize onsite erosion and sedimentation.

ii. The **Buffalo Sewer Authority** will consider:

a) Structural and/or non-structural controls found in the NYS E&SC 2016;

b) Areas that, due to topography, land disturbance (e.g., construction), or other factors, have potential for significant soil erosion;

c) Whether structural, vegetative, and/or stabilization BMPs are needed to limit erosion;

d) Whether velocity dissipation devices (or equivalent measures) are needed at discharge locations and along the length of any channel to provide a non-erosive flow velocity from the structure to a water course; and

e) Address erosion or areas with poor vegetative cover, especially if the erosion is within fifty (50) feet of a surface water of the State.

e. Manage Vegetated Areas and Open Space on Municipal Property

i. Maintain vegetated areas on **Buffalo Sewer Authority** owned/operated property and
right of ways:

a) Specify proper use, storage, and disposal of pesticides, herbicides, and fertilizers including minimizing the use of these products and using only in accordance manufacturer's instruction;

b) Use lawn maintenance and landscaping practices that are protective of water quality. Protective practices include: reduced mowing frequencies; proper disposal of lawn clippings; and use of alternative landscaping materials (e.g., drought resistant planting);

c) Place pet-waste disposal containers and signage concerning the proper collection and disposal of pet waste at all parks and open space where pets are permitted; and

d) Address waterfowl congregation areas where needed to reduce waterfowl droppings from entering the MS4.

f. Salt Storage Piles or Pile Containing Salt

Enclose or cover storage piles of salt, or piles containing salt, used for deicing or maintenance of paved surfaces, except during loading, unloading, and handling. Implement

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appropriate measures (e.g., good housekeeping, routine sweeping, diversions, containment) to minimize exposure resulting from adding to or removing materials from the pile.

g. Waste, Garbage, and Floatable Debris

i. Keep all dumpster lids closed when not in use. For dumpsters and roll off boxes that do not have lids and could leak, ensure that discharges have a control (e.g., secondary containment, treatment); and

ii. Keep exposed areas free of waste, garbage, and debris or intercept them before they are discharged:

a) Manage trash containers at parks and open space (scheduled cleanings; sufficient number);

b) Pick up trash and debris on **Buffalo Sewer Authority** owned/operated property and rights of way; and

c) Clean out catch basins within the appropriate timeframes as noted later in this section.

h. Alternative Implementation Options

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

2. Municipal Facilities[33]

a. Municipal Facility Program

Within three (3) years

The **Buffalo Sewer Authority** has a municipal facility program that includes BMPs to minimize stormwater pollution from municipal operations, differentiation of BMPs applicable to high or low priority facilities, and employee training. The municipal facility program is documented for this SWMP Plan as follows:

i. Municipal facility procedures:

a) All BMPs incorporated into the municipal facility program;

b) High priority municipal facility requirements, that are specific to municipal operations occurring at each high priority facility; and

c) Low priority municipal facility requirements that are specific to municipal operations occurring at each low priority facility.

ii. The **Buffalo Sewer Authority,** in partnership with the Western NY Stormwater Coalition, has an employee training program addressing its municipal facility procedures. This training addresses on-site facility operations and is conducted concurrently with municipal operations procedures.

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a) All new staff that are charged with conducting municipal facility procedures/BMPs will receive training on procedures prior to doing so;

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

c) If the municipal facility procedures/BMPs are updated, all staff will receive training on the updates prior to conducting municipal facility procedures.

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

iv. Annually, by April 1, the **Buffalo Sewer Authority** reviews and updates its municipal facility procedures.

Compliance documentation is listed in Appendix B for:

- **Staff that have received municipal facility procedures training; and,**
- **Updates to the municipal facility procedures.**

b. Municipal Facility Inventory

i. Within two (2) years

The **Buffalo Sewer Authority** maintains an inventory of all municipal facilities in the SWMP Plan. The following information is included in the inventory:

a) Name of municipal facility;

b) Street address;

c) Type of municipal facility;

d) Prioritization (high or low);

e) Receiving waterbody name and class;

f) Receiving waterbody WI/PWL Segment ID;

g) Contact information;

h) Responsible department;

i) Location of SWPPP (if high priority; when completed);

j) Type of activities present on site;

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k) Size of facility (acres);

l) Date of last assessment;

m) BMPs identified; and

n) Projected date of next comprehensive site assessment as per the municipal facility prioritization.

ii. Annually, the **Buffalo Sewer Authority** updates the inventory if new municipal facilities are added.

c. Municipal Facility Prioritization

i. Within three (3) years

The **Buffalo Sewer Authority** prioritizes all known municipal facilities as follows:

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

i) Storage of chemicals, salt, petroleum, pesticides, fertilizers, antifreeze, lead-acid batteries, tires, waste/debris;

ii) Fueling stations; and/or

iii) Vehicle or equipment maintenance/repair.

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

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

ii. Within thirty (30) days of when a municipal facility is added to the inventory, the **Buffalo Sewer Authority** prioritizes it; and

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

- Upon request: contact Stormwater Program Coordinator or Stormwater Management Officer listed on page 2 of this document

- At the **Buffalo Sewer Authority** office in City Hall room 1038, as follows:
    - Hardcopy: Engineering Department
    - Electronically:
        - Public: Upon Request

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- Internally: J:\Engineer\Stormwater\MS4 Compliance

d. High Priority Municipal Facility Requirements

i. Municipal Facility Specific SWPPP

Within five (5) years

The **Buffalo Sewer Authority** has a municipal facility specific SWPPP for each high priority municipal facility. A copy of the municipal facility specific SWPPP is retained on site at the respective municipal facility. The **Buffalo Sewer Authority** SWPPP contains the following:

a) Stormwater Pollution Prevention Team

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

b) General Site Description

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

c) Summary of potential pollutant sources

The municipal facility specific SWPPP must identify each area at the municipal facility where materials or activities are exposed to stormwater or from which authorized non-stormwater discharges originate, including any potential pollutant sources for which the municipal facility has reporting requirements under the Emergency Planning and Community Right-To-Know Act (EPCRA), Section 313.

i) Materials or activities include: machinery; raw materials; intermediate products; byproducts; final products or waste products; and, material handling activities which includes storage, loading and unloading, transportation or conveyance of any raw material, intermediate product, final product or waste product.

ii) For each separate area identified, the description must include:

- Activities - A list of the activities occurring in the area (e.g., material storage, equipment fueling and cleaning);
- Pollutants - A list of the associated pollutant(s) for each activity. The pollutant(s) list must include all materials that are exposed to stormwater; and
- Potential for presence in stormwater - For each area of the municipal facility that generates stormwater discharges, a prediction of the direction of flow, and the likelihood of the activity to contaminate the stormwater discharge. Factors to consider include the toxicity of chemicals, quantity of chemicals used, produced or discharged, the likelihood of contact with stormwater; and history of leaks or spills of toxic or hazardous pollutants.

d) Spills and Releases

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For areas that are exposed to precipitation or that otherwise drain to a stormwater conveyance to be covered under this SPDES general permit, the municipal facility specific SWPPP must include a list of spills or releases of petroleum and hazardous substances or other pollutants, including unauthorized non-stormwater discharges, that
may adversely affect water quality that occurred during the last three-year period. The list must be updated when spills or releases occur.

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

i) Property boundaries and size in acres;

ii) Location and extent of significant structures (including materials shelters), and impervious surfaces;

iii) Monitoring locations with its approximate sewershed. Each monitoring location must be labeled with the monitoring location identification;

iv) Location of all post-construction SMPs and MS4 infrastructure (i.e. storm sewer system);

v) Locations of discharges authorized under other SPDES permits;

vi) Locations where potential spills or releases can contribute to pollutants in stormwater discharges and their accompanying drainage points;

vii) Locations of haul and access roads;
viii) Rail cars and tracks;

ix) Arrows showing direction of stormwater flow;

x) Location of all receiving waters in the immediate vicinity of the municipal facility, indicating if any of the waters are impaired and, if so, whether the waters have TMDLs established for them;

xi) Locations where stormwater flows have significant potential to cause erosion;

xii) Location and source of run-on from adjacent property containing significant quantities of pollutants and/or volume of concern to the municipal facility; and

xiii) Locations of the following areas where such areas are exposed to precipitation or stormwater:

(a) Fueling stations;

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(b) Vehicle and equipment maintenance and/or cleaning areas;

(c) Loading/unloading areas;

(d) Locations used for the treatment, storage or disposal of wastes;

(e) Liquid storage tanks;

(f) Processing and storage areas;

(g) Locations where significant materials, fuel or chemicals are stored and transferred;

(h) Locations where vehicles and/or machinery are stored when not in use;

(i) Transfer areas for substances in bulk;

(j) Location and description of non-stormwater discharges (Part I.A.3.);

(k) Locations where spills[35] or leaks have occurred; and

(l) Locations of all existing structural BMPs.

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

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

ii. Municipal Facility Assessments

a) Wet Weather Visual Monitoring (High Priority Municipal Facilities ONLY)

i) Once every five (5) years, the **Buffalo Sewer Authority** conducts wet weather visual monitoring at all monitoring locations and other sites of stormwater leaving the site that are discharging stormwater from fueling areas, storage areas, vehicle and equipment maintenance/fueling areas, material handling areas and similar potential pollutant generating areas.

(a) All samples must be collected from discharges resulting from a qualifying storm event. The storm event must be documented using the Storm Event Data Form (Appendix I) and kept with the municipal facility specific SWPPP. The sample must be taken during the first thirty (30) minutes (or as soon as practical, but not to exceed one hour) of the

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discharge at the monitoring location.

(b) No analytical tests are required to be performed on the samples for the purpose of meeting the visual monitoring requirements.

(c) The visual examination must document observations of color, odor, clarity, floating solids, settled solids, suspended solids, foam, oil sheen, and any other obvious indicators of stormwater pollution.

(d) The visual examination of the sample must be conducted in a well-lit area.

(e) Where practicable, the same individual should carry out the collection and examination of discharges for the entire permit term for consistency.

(f) The MS4 Operator must document the visual examination using the Visual Monitoring Form (Appendix I) and keep it with the municipal facility specific SWPPP to record:

(i) Monitoring location ID;

(ii) Examination date and time;

(iii) Personnel conducting the examination;

(iv) Nature of the discharge (runoff or snowmelt);

(v) Visual quality of the stormwater discharge including observations of color, odor, clarity, floating solids, settled solids, suspended solids, foam, oil sheen, and other obvious indicators of stormwater pollution; and

(vi) Probable sources of any observed stormwater contamination.

(vii) Corrective and follow up actions – If the visual examination indicates the presence of color, odor, floating solids, settled solids, suspended solids, foam, oil sheen, or other indicators of stormwater pollution, at minimum, the **Buffalo Sewer Authority** will complete and document the following actions:

(1) Evaluate the facility for potential sources;
(2) Remedy the problems identified;
(3) Revise the municipal facility specific SWPPP; and
(4) Perform an additional visual inspection during the first qualifying storm event following implementation of the corrective action. If the first qualifying storm event does not occur until the next visual monitoring period, this

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follow up action may be used as the next visual inspection.

b) The monitoring locations inspection and sampling program (MCM 3: Illicit Discharge Detection and Elimination) includes all **Buffalo Sewer Authority** municipal facilities.

c) Comprehensive Site Assessments

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

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

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

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

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

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

e. Low Priority Municipal Facility Requirements

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

ii. Municipal Facility Assessments

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

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

c) Comprehensive Site Assessments

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

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

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

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

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

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

3. Municipal Operations & Maintenance

a. Municipal Operations Program

Municipal operations in the **Buffalo Sewer Authority** at BSA owned facilities are: street and bridge maintenance; winter road maintenance; MS4 maintenance; open space maintenance; solid waste management; new construction and land disturbances; right-of-way maintenance; or hydrologic habitat modification.

Within three (3) years

The **Buffalo Sewer Authority** has a municipal operations program. The municipal operations program is documented in the SWMP Plan specifying:

i. The municipal operations procedures as follows:

a) The BMPs incorporated into the municipal operations program;

b) The municipal operations corrective actions requirements;

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d) Roads, bridges, parking lots, and right of way maintenance requirements; and

e) All other municipal operations maintenance requirements.

ii. The **Buffalo Sewer Authority,** in partnership with the Western NY Stormwater Coalition, has an employee training program addressing its municipal operations procedures. This training addresses municipal operations procedures and is conducted concurrently with municipal facility procedures.

a) All new staff that are charged with conducting municipal operations procedures will receive training prior to conducting municipal operations procedures;

b) All existing staff, that are charged with conducting any municipal operations procedures will receive training prior to conducting municipal operations procedures and, once every five (5) years, thereafter; and

c) If the municipal operations procedures are updated, all staff will receive training on the updates prior to conducting municipal operations procedures.

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

iv. Annually, by April 1, the **Buffalo Sewer Authority** reviews and updates its municipal operations procedures.

Compliance documentation is listed in Appendix B for:

- **Staff that have received municipal operations procedures training; and,**
- **Updates to the municipal operations procedures.**

b. Municipal Operations Corrective Actions

i. For municipal operations, **Buffalo Sewer Authority** must either:

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

b) Implement corrective actions according to the following schedule and, after implementation, ensure the operations are in compliance with the terms and conditions of the NYSDEC SPDES General Permit for Stormwater Discharges from Municipal Separate Storm Sewer Systems (GP-0-24-001):

i) Within twenty-four (24) hours of discovery for situations that have a reasonable likelihood of adversely affecting human health or the environment;

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ii) Initiated within seven (7) days of inspection and completed within thirty (30) days of inspection for situations that do not have a reasonable likelihood of adversely affecting human health or the environment; and

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

c. Catch Basin Inspection and Maintenance

Within three (3) years of the EDC,
The **Buffalo Sewer Authority** has a catch basin inspection and maintenance program that targets its MS4 Regulated area (see map Appendix A). The program entails the following:

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

a) Areas with construction activities;

b) Residential, commercial, and industrial areas;

c) Recurring or history of issues; or

d) Confirmed citizen complaints on three or more separate occasions in the last twelve (12) months.

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

a) Date of inspection;

b) Approximate level of trash, sediment, and/or debris captured at time of clean-out

- no trash, sediment, and/or debris;
- <50% of the depth of the sump;
- >50% of the depth of the sump);

c) Depth of structure;

d) Depth of sump; and

e) Date of clean out, if applicable.

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

a) Within six (6) months after the catch basin inspection, catch basins which had trash, sediment, and/or debris exceeding 50% of the depth of the sump

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must be cleaned out;

b) Within one (1) year after the catch basin inspection, catch basins which had trash, sediment, and/or debris at less than 50% of the depth of the sump must be cleaned out; and

c) MS4 Operators are not required to clean out catch basins if the catch basins are operating properly and:

i. There is no trash, sediment, and/or debris in the catch basin; or

ii. The sump depth of the catch basin is less than or equal to two (2) feet.

iv. The **Buffalo Sewer Authority** catch basin inspection and maintenance program includes the following practices for properly managing materials removed from catch basins during clean out operations (handling and disposal) so that:

a) Water removed during the catch basin cleaning process will not reenter the MS4 or surface waters of the State;

b) Material removed from catch basins is disposed of in accordance with any applicable environmental laws and regulations; and

c) Material removed during the catch basin cleaning process will not reenter the MS4 or surface waters of the State.

v. The catch basin inspection and maintenance operations process can be used to determine if there are signs/evidence of illicit discharges and procedures for referral/follow-up if illicit discharges are encountered.

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

i. Sweeping

Within six (6) months

The **Buffalo Sewer Authority** has procedures for sweeping and/or cleaning municipal streets, bridges, parking lots, and right of ways owned/operated by the **Buffalo Sewer Authority**.

a) All roads, bridges, parking lots, and right of ways must be swept and/or cleaned once every five (5) years in the spring (following winter activities such as sanding). This requirement is not applicable to:

i) Uncurbed roads with no catch basins;

ii) High-speed limited access highways; or

iii) 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.

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

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i) Uncurbed roads with no catch basins;

ii) High-speed limited access highways; or

iii) Roads defined as interstates, freeways and expressways, or arterials by the USDOT 2013.

ii. Maintenance

Within five (5) years

In addition to the BMPs, the **Buffalo Sewer Authority** adheres to 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 MS4 or surface waters of the State;

c) Restrict the use of herbicides/pesticide application to roadside vegetation; and

d) Contain pollutants associated with bridge maintenance activities (e.g., paint chips, dust, cleaning products, other debris).

iii. Winter Road Maintenance

Within five (5) years

In addition to the BMPs, the **Buffalo Sewer Authority** adheres to the following provisions:

a) Routinely calibrate equipment to control salt/sand application rates; and

b) Ensure that routine snow disposal activities comply with the Division of Water Technical and Operation Guidance Series 5.1.11, Snow Disposal.

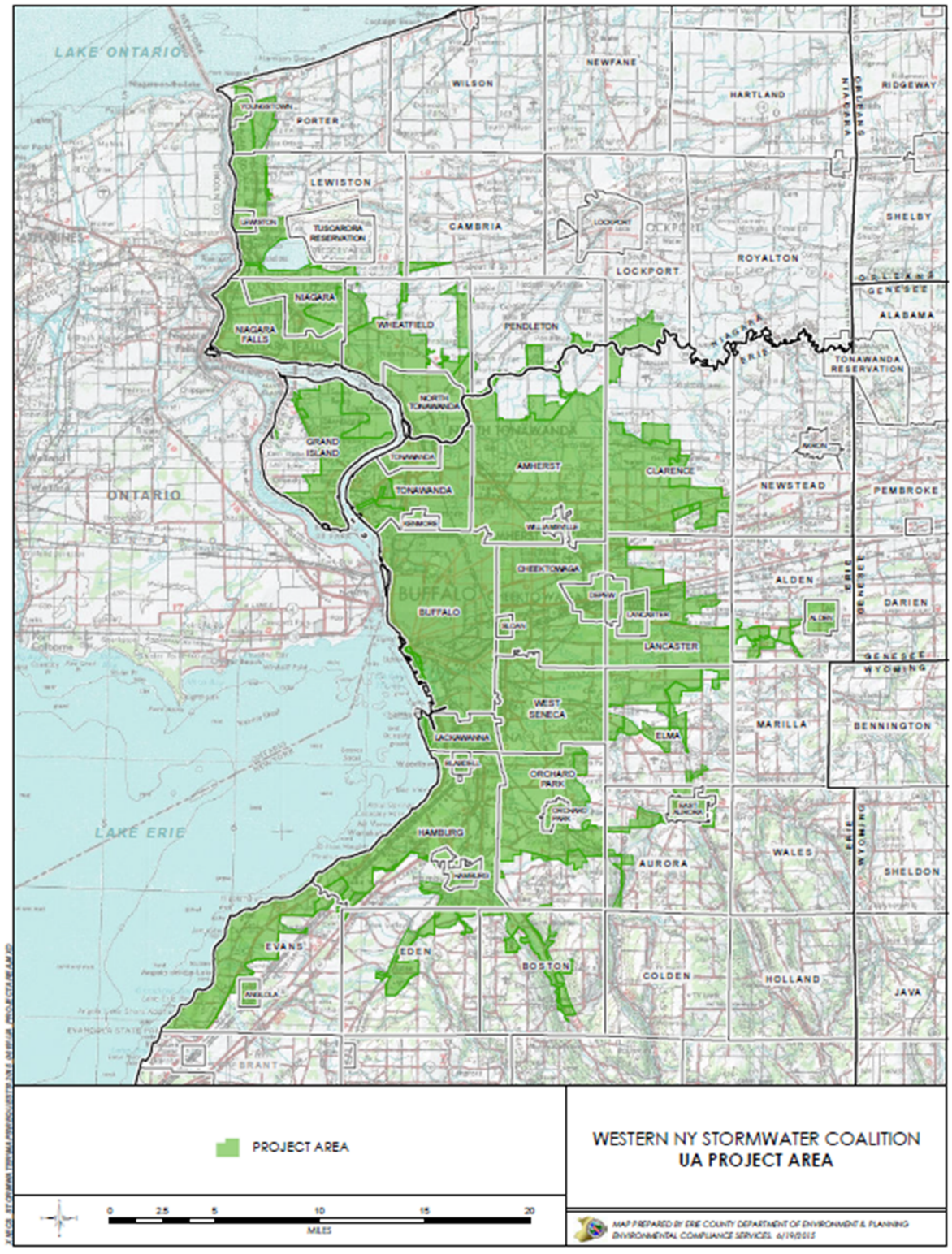
Although not included as an appendix in the SWMP Plan, documentation of the procedures and completion of permit requirements pertaining to Pollution Prevention and Good Housekeeping for Municipal Operations are available as follows:

- Upon request: contact Stormwater Program Coordinator or Stormwater Management Officer listed on page 2 of this document

- At the **Buffalo Sewer Authority** office in City Hall room 1038, as follows:
    - Hardcopy: Engineering Department
    - Electronically:
        - Public: Upon Request
        - Internally: J:\Engineer\Stormwater\MS4 Compliance

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Map of Erie and Niagara County MS4 Regulated Area Appendix A



SWMP Plan Compliance Documentation Appendix B

A. MCM1 – Public Education and Outreach Program

Compliance Documentation

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

i. Residents:

Landscaping and lawn care:

Date of completion: January 2, 2024 - present

Method used: Brochure: Household Guide to Preventing Stormwater Pollution posted online: www. erie.gov/stormwater; Handouts at public tabling events (2024:14, 2025:18)

Dog waste:

Date of completion:

Method used: Brochure: Pick Up Your Pet Waste: It's Your Doody posted online: www. erie.gov/stormwater; Handouts at public tabling events (2024:14, 2025:18)

Household hazardous waste disposal:

Date of completion: Annual event

Method used: Brochure: Household Guide to Preventing Stormwater Pollution posted online: www. erie.gov/stormwater; Handouts at public tabling events (2024:14, 2025:18); Press Releases for event by City of Buffalo and Erie County; Erie County newsletters; social media posts

Vehicle washing:

Date of completion: January 2, 2024 - present

Method used: Brochure Household Guide to Preventing Stormwater Pollution posted online: www. erie.gov/stormwater; Handouts at public tabling events (2024:14, 2025:18)

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Illicit Discharge:

Date of completion: June 15, 2024 (libraries); January 2, 2024 - present

Method used: Brochure: Illicit Discharge Detection and Elimination: A Citizen's Guide to Identifying and Preventing Stormwater Pollution posted online: www.erie.gov/stormwater; Handouts at public tabling events (2024:14, 2025:18) and distributed to libraries in Buffalo and Erie County

Ii. Commercial: Business Owners and Staff:

Landscaping and lawn care:

Date of completion: _____

Method used: _____

Vehicle fueling:

Date of completion: _____

Method used: _____

Vehicle maintenance:

Date of completion: _____

Method used: _____

Uncovered materials exposure/storage:

Date of completion: _____

Method used: _____

Illicit Discharge:

Date of completion: _____

Method used: _____

Iii. Institutions: Managers, Staff, and Students (Institutions Not Subject to SPDES MS4/MSGP Stormwater Permitting)

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Uncovered materials exposure/storage:

Date of completion: _____

Method used: _____

IV. Construction: Developers, Contractors, And Design Professionals:

Soil disturbance:

Date of completion: 1/1/25; 2/19/25; 1/14/26; 2/10/26

Method used: NYSDEC 4 Hour Erosion & Sediment Control Training

Uncontained construction waste:

Date of completion: 1/1/25; 2/19/25; 1/14/26; 2/10/26

Method used: NYSDEC 4 Hour Erosion & Sediment Control Training

V. Industrial: Owners and Staff: (Industry Not Subject to SPDES MSGP Stormwater Permit)

Uncovered materials exposure/storage:

Date of completion: _____

Method used: _____

Vi. MS4 Operator's Municipal Staff:

Uncovered materials exposure/storage

Date of completion: 10/14/25

Method used: Pollution Prevention – Good Housekeeping Training

Preventative maintenance:

Date of completion: 10/14/25

Method used: Pollution Prevention – Good Housekeeping Training

Spill prevention and response:

Date of completion: 10/14/25

Method used: Pollution Prevention – Good Housekeeping Training

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Erosion and Sediment Controls:

Date of completion: 10/14/25

Method used: Pollution Prevention – Good Housekeeping Training

Vegetated areas and open space:

Date of completion: 10/14/25

Method used: Pollution Prevention – Good Housekeeping Training

Salt storage:

Date of completion: 10/14/25

Method used: Pollution Prevention – Good Housekeeping Training

Waste, garbage and floatable debris:

Date of completion: 10/14/25

Method used: Pollution Prevention – Good Housekeeping Training

Illicit Discharge:

Date of completion: 10/14/25

Method used: Pollution Prevention – Good Housekeeping Training

Updates to the Public Education and Outreach Program

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

Date of Review	Description of Update (including "No Update")
3/12/25	No update
3/19/26	No update

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SWMP Plan Compliance Documentation Appendix B (continued)

B. MCM 2 - Public Involvement/Participation

Public involvement/participation in the development and implementation of the **Buffalo Sewer Authority** SWMP includes opportunities to: review the SWMP Plan; submit comments; ask questions; and, become involved in the SWMP.

To document (annually), enter date(s) of completion:

Citizen advisory group on stormwater management

Description: QCCW Clean Waters Stakeholder Advisory Committee, East Delavan Advisory Committee (EDAC)

Method used: Monthly Meetings

Dates of completion: _____

Public hearings or meetings

Description: Public Meeting to discuss upcoming projects

Method used: Public Meeting

Dates of completion: _____

Citizen volunteers to educate other individuals about the SWMP

Description: _____

Method used: _____

Dates of completion: _____

Coordination with other pre-existing public involvement/participation opportunities

Description: BPS Saturday Academy, Masten District Stakeholder's Breakfast, Ellicott District Stakeholder's Breakfast

Method used: Tabling with activities for students grade PK-12 and families, Tabling and presentations at the District Stakeholder's Meetings

Dates of completion: _____

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Reporting concerns about activities or behaviors observed

Description: City Residents can submit any concerns online on the Buffalo Sewer Authority website

Method used: BSA website: www.buffalosewer.org

Dates of completion: Ongoing

Stewardship activities

Description:

Method used:

Dates of completion:

Public Notice and Input Requirements for Draft Annual Report

Annually, the **Buffalo Sewer Authority** provides an opportunity for the public to review and comment on the draft Annual Report. Listed below are the date(s) of review and description of the opportunity provided.

Date of Review	Description of Opportunity
3/14/25	Buffalo Sewer Authority Website
3/20/26	Public Meeting, Website

Consideration of Public Input

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

Date Received	Description of SWMP Plan Comments
3/14/25	Buffalo Sewer Authority Website
3/20/26	Public Meeting, Website

Date Received	Description of Draft Annual Report Comments
3/14/25	No comments received
3/20/26	

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

Date of Update	**Description of SWMP Plan Update or "No Update" if applicable**
4/2/25	No update

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SWMP Plan Compliance Documentation Appendix B (continued)

C. MCM 3 - Illicit Discharge Detection and Elimination

1. Illicit Discharge Detection

Public Reporting of Illicit Discharges

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

Date of the report: 11/3/25

Location of the illicit discharge: 91 Ganson (Buffalo River)

Nature of the illicit discharge: Amazing Logistics, LLC Truck driver, Jeison Arcos, parked and dumped approximately 50 gallons of diesel / gasoline fuel into the Buffalo River between 2:45 pm and 7:30 pm.

Follow up actions taken or needed (including response times): BSA inspected the MS4 near 91 Ganson and found an oily sheen and collected water samples. Both diesel and gasoline were found and are considered hazardous pollutants.

Inspection outcomes and any enforcement taken: Due to the deliberate nature of the illicit discharge into the waterways, the magnitude of the impact on human health and the environment. Amazing Logistics, LLC was fined $10,000 per day from the date of the incident.

Date of the report: _____

Location of the illicit discharge: _____

Nature of the illicit discharge: _____

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

_____

Inspection outcomes and any enforcement taken: _____

_____

Date of the report: _____

Location of the illicit discharge: _____

Nature of the illicit discharge: _____

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

_____

Inspection outcomes and any enforcement taken: _____

_____

Annually, the **Buffalo Sewer Authority** updates the inventory for new monitoring locations that are constructed or discovered; or if information for existing monitoring locations change. Prioritization determinations and updates are also addressed below.

Date of Update	Description Inventory Update(s); or "No Update" if applicable

Annually, the **Buffalo Sewer Authority** reviews and updates the names, titles, and contact information for the individuals who have received illicit discharge training on the following:

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

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

Date of Update	Name, title & email of individual trained	Training Date
11/26/25	Nicholas Brandjes, GIS Specialist I, nbrandjes@buffalosewer.org	5/27/25
11/26/25	William Conroy, Sewer Construction Inspector, wconroy@buffalosewer.org	5/27/25
11/26/25	Denis Deegan, Sewer Construction Inspector, ddeegan@buffalosewer.org	5/27/25
11/26/25	Regina Harris, Senior Engineer, rharris@buffalosewer.org	5/27/25
11/26/25	John Kerruish, Sewer Construction Inspector, jkerruish@buffalosewer.org	5/27/25
11/26/25	Elizabeth Scheeler, Industrial Waste (IW) Administrator, escheeler@buffalosewer.org	5/27/25
11/26/25	Kaitlin Walsh, GIS Specialist II, kwalsh@buffalosewer.org	5/27/25
11/26/25	Lynda Brundige, IW Field Technician, lbrundige@buffalosewer.org	10/7/25

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

Date of Update	Description Inspection and Sampling Procedures Update(s); or "No Update" if applicable
3/18/26	No Update

SWMP Plan Compliance Documentation Appendix B (continued)

D. MCM 3 – Construction Site Stormwater Runoff Control

Annually, the **Buffalo Sewer Authority** reviews and updates the names, titles, and contact information for the individuals who have received **Construction Oversight Training**.

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

Annually, by April 1, the **Buffalo Sewer Authority** reviews and updates its construction oversight procedures.

Date of Update	Description Construction Oversight Procedures Update(s); or "No Update" if applicable
3/21/25	No Update
3/18/26	No update

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Annually, the **Buffalo Sewer Authority** updates it CGP-regulated construction sites inventory.

Date of Update	Description Inventory Update(s); or "No Update" if applicable
2/20/26	Verified accuracy of inventory and inspections completed at each site

Individuals **involved in construction activity, SWPPP review, construction site inspections** in the **Buffalo Sewer Authority** have received four (4) hours of Department endorsed training in proper erosion and sediment control principles from a Soil & Water Conservation District, or other Department endorsed entity. Individuals who meet the definition of a qualified professional or qualified inspector are exempt from this requirement.

Date of Training	Name, Title & Email of Individual Trained	Task : Oversight; SWPPP Review; Inspection
2/19/25	Nicholas Brandjes	SWPPP Review
6/18/25	William Conroy	Inspection
6/18/25	Regina Harris	Oversight
6/18/25	Desmond Laws	Inspection
6/18/25	Joseph Paradisi	Inspection
6/18/25	Elizabeth Scheeler	Inspection
6/18/25	Lynda Brundige	Inspection

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SWMP Plan Compliance Documentation Appendix B (continued)

E. MCM 5 – Post-Construction Stormwater Management

Annually, the **Buffalo Sewer Authority** reviews and updates the names, titles, and contact information for the individuals who have received **Post-Construction SMP Inspection And Maintenance Training.**

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

Annually, the **Buffalo Sewer Authority** updates its inventory of post-construction SMPs.

Date of Update	Description Inventory Update(s); or "No Update" if applicable

Annually, by April 1, the **Buffalo Sewer Authority** reviews and updates its post-construction SMP inspection and maintenance procedures.

Date of Update	Description Post-construction SMP Inspection and Maintenance Procedures Update(s); or "No Update" if applicable

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F. MCM 6 – Pollution Prevention and Good Housekeeping

Annually, the **Buffalo Sewer Authority** reviews and updates the names, titles, and contact information for the individuals who have received **Municipal Facility Procedures Training And Municipal Operations Procedures Training**.

Date of Update	Name, Title & Email of Individual Trained	Training Date
11/26/25	Elizabeth Scheeler, Industrial Waste (IW) Administrator, escheeler@buffalosewer.org	10/14/25

Annually, by April 1, the **Buffalo Sewer Authority** reviews and updates its municipal facility procedures and its municipal operations procedures.

Date of Update	Description Municipal Facility Procedures Update(s)
11/26/25	No Update

Date of Update	Description Municipal Operations Procedures Update(s)
11/26/25	No Update

Annually, the **Buffalo Sewer Authority** updates its inventory of all municipal facilities.

Date of Update	Description Inventory Update(s); or “No Update” if applicable
11/25/25	No update

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Monitoring Locations Inspection and Sampling Field Sheet

Section 1: Background Data

Subwatershed:		Monitoring Location ID:	
Today's date:		Time (Military):	
Investigators:		Form completed by:	
Temperature (°F):	Rainfall (in.): Last 24 hours: Last 48 hours:		
Latitude:	Longitude:	GPS Unit:	GPS LMK #:
Camera:		Photo #s:	

Land Use in Drainage Area (Check all that apply):

☐ Industrial	☐ Open Space
☐ Ultra-Urban Residential	☐ Institutional
☐ Suburban Residential	Other: _____
☐ Commercial	Known Industries: _____

Notes (e.g., origin, if known):

Section 2: Monitoring Location Description

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

Section 3: Quantitative Characterization

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

Monitoring Locations Inspection and Sampling Field Sheet

Section 4: Physical Indicators for Flowing Monitoring Locations Only

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

INDICATOR	CHECK If Present	DESCRIPTION	RELATIVE SEVERITY INDEX (1-3)		
Odor	☐	☐ Sewage ☐ Rancid/sour ☐ Petroleum/gas ☐ Sulfide ☐ Other:	☐ 1 - Faint	☐ 2 – Easily detected	☐ 3 – Noticeable from a distance
Color	☐	☐ Clear ☐ Brown ☐ Gray ☐ Yellow ☐ Green ☐ Orange ☐ Red ☐ Other:	☐ 1 – Faint colors in sample bottle	☐ 2 – Clearly visible in sample bottle	☐ 3 – Clearly visible in flow
Turbidity	☐	See severity	☐ 1 – Slight cloudiness	☐ 2 - Cloudy	☐ 3 – Opaque
Floatables -Does Not Include Trash!!	☐	☐ Sewage (Toilet Paper, etc.) ☐ Suds ☐ Petroleum (oil sheen) ☐ Other:	☐ 1 – Few/slight; origin not obvious	☐ 2 - Some; indications of origin (e.g., possible suds or oil sheen)	☐ 3 - Some; origin clear (e.g., obvious oil sheen, suds, or floating sanitary materials)

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

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

INDICATOR	CHECK If Present	DESCRIPTION	COMMENTS
Monitoring Location Damage	☐	☐ Spalling, Cracking or Chipping ☐ Peeling Paint ☐ Corrosion	
Deposits/Stains	☐	☐ Oily ☐ Flow Line ☐ Paint ☐ Other:	
Abnormal Vegetation	☐	☐ Excessive ☐ Inhibited	
Poor pool quality	☐	☐ Odors ☐ Colors ☐ Floatables ☐ Oil Sheen ☐ Suds ☐ Excessive Algae ☐ Other:	
Pipe benthic growth	☐	☐ Brown ☐ Orange ☐ Green ☐ Other:	

Section 6: Overall Monitoring Location Characterization

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

Section 7: Data Collection

1.	Sample for the lab?	☐ Yes	☐ No			
2.	If yes, collected from:	☐ Flow	☐ Pool			
3.	Intermittent flow trap set?	☐ Yes	☐ No	If Yes, type:	☐ OBM	☐ Caulk dam

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

OUTFALL AND MONITORING LOCATIONS GUIDANCE

Procedures for Dry Weather Inspection, Sampling, Track Down and Elimination

Dry weather: No precipitation/snow melt for at least 48 hours (minimum; consider longer during periods of prolonged wet weather).

I. **Choose Monitoring Locations (outfalls, interconnections, intra-connections)**
   a. Review previous outfall inspections; identify monitoring locations/outfalls requiring inspection or any that may require re-inspection.
   b. Prepare for dry weather inspection: Monitoring Locations Inspection and Sampling Field Sheet, outfall report/current data for all to be inspected, storm system maps/route, clip board, pen.
   c. Each outfall has a detailed report listing dimensions/composition of the pipe or ditch and also visual observations of the flow, if it was flowing at the time data were collected.
   d. The outfall report should be updated to reflect any changes, especially the "Outfall Discharging" answer.
      i. Submit an Outfall Map Update Request form.
      OR
      ii. The Outfall Editor App can be used in the field to make real time changes to your outfall report, including a new picture. Do not change ownership or Outfall IDs.

II. **Inspect/Sample Monitoring Locations/Outfalls**

Dry weather inspections and sampling can be done at the same time.

   a. Inspection
      i. Inspect each monitoring location scheduled for the year.
      ii. If you cannot find the end of the pipe or ditch, or it is inaccessible or unsafe to reach, locate the first upstream catch basin/access point to determine whether there is flow. Note the inspection point on the form if it deviates from the mapped monitoring location. Make a note in your files for future inspections.
      iii. If no flow is present, complete Sections 1, 2 and 5 on the Monitoring Locations Inspection and Sampling Field Sheet. If flow is present, complete Sections 4 and 6 too.
   b. Sampling
      i. Schedule (or proceed with) sampling for monitoring locations discharging flow during dry weather based on completion of Sections 2, 4, 5 and 6 of the Monitoring Locations Inspection and Sampling Field Sheet. Complete Sections 3 and 7 if sampling. If the source of the illicit discharge is clear and discernable (e.g. sewage), sampling is not necessary.

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ii. Suggested sampling equipment and supplies
Note: The equipment listed below, including the black light, was provided to all WNY Stormwater Coalition members in 2011.
The WNY Stormwater Coalition has test strips and equipment available to borrow. Purchasing information can be provided upon request.
Contact for both: Mary Rossi at mary.rossi@erie.gov.

- Equipment
  - Hanna pH/Temp/Conductivity/TDS Meter
  - 6' Dipper Sample Collector
  - Nalgene Wash Bottle
  - Safety Glasses
  - 600 mL plastic beakers (2)
  - Glass jar/bottle with tight lid
  - Disposable Gloves
  - Tape Measure
  - Distilled Water
  - Paper Towels
  - Trash Bag
  - Hand Sanitizer
  - Black Light Fixture and Cotton Pads
- Test Strips
  - Ammonia (Hach # 4315-70)
  - pH (LaMotte # 5049-36)
  - Total Chlorine (LaMotte # 5049-36)
  - Nitrite (LaMotte # 5049-39)
  - Nitrate (LaMotte # 5049-39)
  - Phosphate (Hach # 4315-75)

iii. Use the **Outfall and Monitoring Location Sampling Guide** (follows) to conduct on-site sampling using field meter and test strips; if detergent contamination is suspected (bubbles/suds/etc.), a sample will need to be brought back for exposure to black light. Record results in Section 3 on the Monitoring Locations Inspection and Sampling Field Sheet.

c. Retain forms as documentation of inspection/sampling for 5 years.

III. **Illicit Discharge Track Down**

For all flows characterized as "suspect" or "obvious" in Section 6 of the Monitoring Locations Inspection and Sampling Field Sheet, source track down must be conducted according to the following timeframe:

a. Following inspection and sampling, within twenty-four (24) hours of discovery, the MS4 Operator must initiate track down procedures for flowing MS4 monitoring locations with **obvious** illicit discharges.

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b. Within two (2) hours of discovery, the MS4 Operator must initiate track down procedures for **obvious** illicit discharges of sanitary wastewater that would affect bathing areas during bathing season, shell fishing areas or public water intakes and report orally or electronically to the NYSDEC Regional Water Engineer and local health department; and
c. Within five (5) days of discovery, the MS4 Operator must initiate track down procedures for **suspect** illicit discharges.
d. Consult sewer and land use maps to evaluate potential contributing area and characteristics of the area.
e. Visually inspect catch basins/manholes/ditches progressively upstream from the outfall/monitoring location to identify contributing areas with no flow that can be eliminated from further consideration.
f. It is possible that the visual inspections indicate the source of flow/contamination is from another MS4 entering your system at an interconnection. Contact their stormwater coordinator, in writing, and describe your findings along with a precise location for the point where flow from their system enters your system. Keep this documentation for 5 years. Add a note in your files or on the outfall report itself to save time and trouble for the next inspection.
g. See Track Down Techniques table for additional track down options.

Track Down Techniques to Locate the Discharge

Technique	*Best Applications*	*Limitations*
Dye Testing	Discharge limited to a very small drainage area (<10 properties is ideal) • Discharge probably caused by a connection from an individual property • Commercial or industrial land use	• May be difficult to gain access to some properties
Video Testing	• Continuous discharges • Discharge limited to a single pipe segment • Communities who own equipment for other investigations	• Relatively expensive equipment • Cannot capture non-flowing discharges • Often cannot capture discharges from pipes submerged in the storm drain
Smoke Testing	• Cross-connection with the sanitary sewer • Identifying other underground sources (e.g., leaking storage techniques) caused by damage to the storm drain	• Poor notification to public can cause alarm • Cannot detect all illicit discharges

(Illicit Discharge Detection and Elimination: A Guidance Manual for Program Development and Technical Assistance, Center for Watershed Protection October 2004)

IV. Illicit Discharge Elimination

a. Eliminate source of contamination or if nature of the source prohibits elimination, utilize targeted education to inform/minimize the source (e.g. pet waste or pool/spa water disposed in storm sewers: distribute information on proper disposal throughout neighborhood).
b. The following timeframes are required for illicit discharge elimination:
    i. Within twenty-four (24) hours of identification of an illicit discharge that has a reasonable likelihood of adversely affecting human health or the environment, the MS4 Operator must eliminate the illicit discharge;
    ii. Within five (5) days of identification of an illicit discharge that does not have a reasonable likelihood of adversely affecting human health or the environment, the MS4 Operator must eliminate the illicit discharge;
    iii. Where elimination of an illicit discharge within the specified timeframes is not possible, the MS4 Operator must notify the Regional Water Engineer.
c. Refer to your Stormwater Management Plan (Appendix O) for detailed provisions for escalating enforcement and tracking. Your municipality has a local law specific to illicit discharges to assist with enforcement as needed.

V. **Documentation**

The Monitoring Locations Inspection and Sampling Field Sheet completed in the field is to be filed and retained as compliance documentation for inspection and sampling. You may also scan the completed forms. If you opt to scan, create a new folder for each year or indicate year of inspection in the file name (this will be helpful for planning inspections to meet your compliance goal and for state/federal compliance audits). Retain all documentation for 5 years.

a. Inspection Frequency (20%/year)
    i. Completed Monitoring Locations Inspection and Sampling Field Sheets.
    ii. Record monitoring locations inspected on spreadsheet or whatever you use to track inspections. It doesn't have to be elaborate, just a tool to identify outfalls inspected and those in need of inspection.
    e.g. Outfall ID and date inspected are adequate. Additional information such as whether it was flowing and a "Notes" column are also useful.
b. Sampling
    The Monitoring Locations Inspection and Sampling Field Sheet documents both inspection and sampling.
c. Track Down and Elimination
    All steps and actions utilized to track down and eliminate illicit discharges should be carefully documented. There is no "one size fit" as each instance will be unique. Documentation should include all efforts taken to identify and eliminate the source of contamination: how track down was done, results of track down, actions to eliminate source of contamination, additional details, and any enforcement measures utilized.

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BUFFALO
SEWER AUTHORITY

Buffalo Sewer Authority IDDE Track Down Report

Date Discharge Observed:

Outfall/Manhole ID:

Location Description:

Sample ID:

Description of Discharge:

Employee Name / Title:

Name of the owner/operator of the facility or site of the violation:

Location of the stormwater source (e.g., construction project):

Description of the violation:

Schedule for returning to compliance:

Description of enforcement response used, including escalated responses if repeat violations occur or violations are not resolved in a timely manner:

Accompanying documentation of enforcement response (e.g., notices of noncompliance, notices of violations):

Any referrals to different departments or agencies:

Date violation was resolved:

Comments:

Outfall and Monitoring Location Sampling Guide

This document was prepared to serve as quick reference for sampling flowing outfalls using your Hanna meter for pH, temperature, Total Dissolved Solids (TDS) and Conductivity, test strips for Ammonia, pH, Total Chlorine, Nitrite/Nitrate and Phosphate, and black light/cotton pad for detergents. Depending on the results and visual observations at the outfall, source identification and elimination of that source may be necessary as well as additional sampling.

Sample collection

1. When possible, sample flow directly in a clean, wide mouth beaker (rinse dipper and beakers 2x with flow for conditioning). Dump the contents downstream from sample collection point.
2. Collect two samples: one for the field meter analyses and one for the test strips. Note: I use the beaker for one sample and the dipper for the second.

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

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



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

Test Strips

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

Ammonia (HACH # 4315-70)

Ammonia levels are tested to indicate presence of **sanitary sewage** in stormwater. Should high levels be detected, further investigation and source track down are required. If the illicit discharge is clearly and discernably sewage, sampling is not necessary.

1. Dip strip into water sample.
2. Vigorously move it up and down in water sample for 30 seconds, making sure both pads are always submerged.
3. Remove test strip and shake off excess water.



4. Hold the strip level, with pad side up, for 30 seconds.
5. To read the result, turn the test strip over so that both pads face away from you.
6. Compare the color of the small pad to the color chart on the container.
7. Read the result through the clear plastic of the test strip.
8. Record the result on the Monitoring Locations Inspection and Sampling Field Sheet.

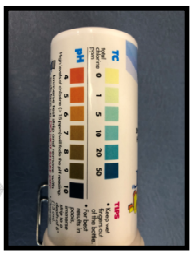


pH and Total Chlorine (LaMotte # 5049-36)

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

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



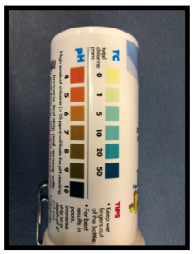


Nitrite and Nitrate (LaMotte # 5049-39)

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

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





Phosphate (HACH # 4315-75)

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

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



Additional Testing

Detergents – Black Light/Cotton Pad

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

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



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

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Construction Activities that Require SWPPP — Appendix E

(from NYS Construction General Permit (GP-0-20-001)
Appendix B-Table 1 and Table 2

Table 1
Construction Activities that Require the Preparation of a SWPPP That Only Includes Erosion and Sediment Controls

The following construction activities that involve soil disturbances of one (1) or more acres of land, but less than five (5) acres:

- Single family home not located in one of the watersheds listed in Appendix C or not *directly discharging* to one of the 303(d) segments listed in Appendix E
- Single family residential subdivisions with 25% or less impervious cover at total site build-out and not located in one of the watersheds listed in Appendix C and not directly discharging to one of the 303(d) segments listed in Appendix E
- Construction of a barn or other *agricultural building*, silo, stock yard or pen.

The following construction activities that involve soil disturbances between five thousand (5000) square feet and one (1) acre of land:

All construction activities located in the watersheds identified in Appendix D that involve soil disturbances between five thousand (5,000) square feet and one (1) acre of land.

The following construction activities that involve soil disturbances of one (1) or more acres of land:

- Installation of underground, linear utilities; such as gas lines, fiber-optic cable, cable TV, electric, telephone, sewer mains, and water mains
- Environmental enhancement projects, such as wetland mitigation projects, stormwater retrofits and stream restoration projects
- Pond construction
- Linear bike paths running through areas with vegetative cover, including bike paths surfaced with an impervious cover
- Cross-country ski trails and walking/hiking trails
- Sidewalk, bike path or walking path projects, surfaced with an impervious cover, that are not part of residential, commercial or institutional development;
- Sidewalk, bike path or walking path projects, surfaced with an impervious cover, that include incidental shoulder or curb work along an existing highway to support construction of the sidewalk, bike path or walking path.
- Slope stabilization projects
- Slope flattening that changes the grade of the site, but does not significantly change the runoff characteristics

Construction Activities that Require SWPPP Appendix E (continued)

Table 1 (Continued) CONSTRUCTION ACTIVITIES THAT REQUIRE THE PREPARATION OF A SWPPP THAT ONLY INCLUDES EROSION AND SEDIMENT CONTROLS

The following construction activities that involve soil disturbances of one (1) or more acres of land:

- Spoil areas that will be covered with vegetation
- Vegetated open space projects (i.e. recreational parks, lawns, meadows, fields, downhill ski trails) excluding projects that *alter hydrology from pre to post development* conditions,
- Athletic fields (natural grass) that do not include the construction or reconstruction of *impervious area* and do not *alter hydrology from pre to post development* conditions
- Demolition project where vegetation will be established, and no redevelopment is planned
- Overhead electric transmission line project that does not include the construction of permanent access roads or parking areas surfaced with *impervious cover*
- Structural practices as identified in Table II in the "Agricultural Management Practices Catalog for Nonpoint Source Pollution in New York State", excluding projects that involve soil disturbances of greater than five acres and construction activities that include the construction or reconstruction of impervious area
- Temporary access roads, median crossovers, detour roads, lanes, or other temporary impervious areas that will be restored to pre-construction conditions once the construction activity is complete

Construction Activities that Require SWPPP Appendix E (continued)

Table 2

CONSTRUCTION ACTIVITIES THAT REQUIRE THE PREPARATION OF A SWPPP THAT INCLUDES POST-CONSTRUCTION STORMWATER MANAGEMENT PRACTICES

The following construction activities that involve soil disturbances of one (1) or more acres of land:

- Single family home located in one of the watersheds listed in Appendix C or *directly discharging* to one of the 303(d) segments listed in Appendix E
- Single family home that disturbs five (5) or more acres of land
- Single family residential subdivisions located in one of the watersheds listed in Appendix C or *directly discharging* to one of the 303(d) segments listed in Appendix E
- Single family residential subdivisions that involve soil disturbances of between one (1) and five (5) acres of land with greater than 25% impervious cover at total site build-out
- Single family residential subdivisions that involve soil disturbances of five (5) or more acres of land, and single family residential subdivisions that involve soil disturbances of less than five (5) acres that are part of a larger common plan of development or sale that will ultimately disturb five or more acres of land
- Multi-family residential developments; includes duplexes, townhomes, condominiums, senior housing complexes, apartment complexes, and mobile home parks
- Airports
- Amusement parks
- Breweries, cideries, and wineries, including establishments constructed on agricultural land
- Campgrounds
- Cemeteries that include the construction or reconstruction of impervious area (>5% of disturbed area) or *alter the hydrology from pre to post development* conditions
- Commercial developments
- Churches and other places of worship
- Construction of a barn or other *agricultural building* (e.g. silo) and structural practices as identified in Table II in the "Agricultural Management Practices Catalog for Nonpoint Source Pollution in New York State" that include the construction or reconstruction of *impervious area*, excluding projects that involve soil disturbances of less than five acres.
- Golf courses
- Institutional development; includes hospitals, prisons, schools and colleges
- Industrial facilities; includes industrial parks
- Landfills
- Municipal facilities; includes highway garages, transfer stations, office buildings, POTW's, water treatment plants, and water storage tanks
- Office complexes
- Playgrounds that include the construction or reconstruction of impervious area
- Sports complexes
- Racetracks; includes racetracks with earthen (dirt) surface
- Road construction or reconstruction, including roads constructed as part of the construction activities listed in Table 1

Construction Activities that Require SWPPP Appendix E (continued)

Table 2 (Continued)

CONSTRUCTION ACTIVITIES THAT REQUIRE THE PREPARATION OF A SWPPP THAT INCLUDES POST-CONSTRUCTION STORMWATER MANAGEMENT PRACTICES

The following construction activities that involve soil disturbances of one (1) or more acres of land:

- Parking lot construction or reconstruction, including parking lots constructed as part of the construction activities listed in Table 1
- Athletic fields (natural grass) that include the construction or reconstruction of impervious area (>5% of disturbed area) or *alter the hydrology from pre to post development* conditions
- Athletic fields with artificial turf
- Permanent access roads, parking areas, substations, compressor stations and well drilling pads, surfaced with *impervious cover,* and constructed as part of an over-head electric transmission line project, wind-power project, cell tower project, oil or gas well drilling project, sewer or water main project or other linear utility project
- Sidewalk, bike path or walking path projects, surfaced with an impervious cover, that are part of a residential, commercial or institutional development
- Sidewalk, bike path or walking path projects, surfaced with an impervious cover, that are part of a highway construction or reconstruction project
- All other construction activities that include the construction or reconstruction of *impervious area* or *alter the hydrology from pre to post development* conditions, and are not listed in Table 1

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF WATER
SPDES General Permit for Stormwater Discharges from Construction Activity (GP-0-15-002)
Stormwater Pollution Prevention Plan Review Checklist

Project Name: **Site Address:** **Municipality:** **County:**	☐ **Basic SWPPP (E&SC Plan)** **Watershed:** **Appendix E 303(d) segment:**	☐ **Full SWPPP** **Date:** **SPDES General Permit ID Number:** **NYR1__ _____**
Owner/Operator: **Address:**	**Phone:** **Fax:**	**Reviewer:**

General Requirements

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

Erosion & Sediment Control Requirements

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

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Stormwater Pollution Prevention Plan Review Checklist

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

Post-construction Stormwater Management Practices

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

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Stormwater Pollution Prevention Plan Review Checklist

			identification of any Design Manual sizing criteria that are not required under the General Permit	
☐	☐	☐	Soil testing results and locations of test pits and borings are included	III.B.2.d.
☐	☐	☐	Infiltration test results are included if needed	III.B.2.e.
☐	☐	☐	O&M plan, including inspection & maintenance schedules, is included and Identifies the responsible entity	III.B.2.f.
☐	☐	☐	Enhanced Phosphorus Removal Standards sizing criteria are included if required.	III.B.3.

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NEW YORK STATE
DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF WATER

Department of Environmental Conservation

New York State Department of Environmental Conservation

Construction Site Inspection Report for SPDES MS4 General Permit GP-0-24-001

Project Name:		Date:	
Project Location:		Weather:	
Permit # (if any): NYR	Contacted: ☐Yes ☐No	Entry Time:	Exit Time:
Name of SPDES Permittee:		Inspection Type:	☐NOT ☐ Complaint
Phone Number(s):			☐ Compliance ☐ Referral
On-site Representative(s) and Company(s):		MS4 Operator Name:	
		MS4 Permit ID: NYR20A	

SPDES Authority

	Yes	No	N/A		Citation
1.	☐	☐	☐	Does the project have permit coverage?	GP-0-20-001: I.A & II. B
2.	☐	☐	☐	Is a copy of the NOI and Acknowledgment Letter available on site and accessible for viewing?	GP-0-20-001: II.D.2
3.	☐	☐	☐	Is a copy of the MS4 SWPPP Acceptance Form available on site and accessible for viewing?	GP-0-20-001: II.D.2
4.	☐	☐	☐	Is an up-to-date copy of the signed SWPPP retained at the construction site?	GP-0-20-001: II.D.2. & III.A.4
5.	☐	☐	☐	Is a copy of the SPDES General Permit retained at the construction site?	GP-0-20-001: II.D.2
6.	☐	☐	☐	Does the NOI accurately report the number of acres to be disturbed?	GP-0-20-001: II.B.4

SWPPP Content

	Yes	No	N/A		Citation
7.	☐	☐	☐	Does the SWPPP describe and identify the erosion and sediment control measures to be employed?	GP-0-20-001: III.B.1.e
8.	☐	☐	☐	Does the SWPPP provide an inspection schedule and maintenance requirements for the E&SC measures?	GP-0-20-001: III.B.1.i
9.	☐	☐	☐	Does the SWPPP describe and identify the stormwater management practices to be employed?	GP-0-20-001: III.B.2
10.	☐	☐	☐	Does the SWPPP identify the contractor(s) and subcontractor(s) responsible for each measure?	GP-0-20-001: III.A.6
11.	☐	☐	☐	Does the SWPPP identify at least one trained individual from each contractor(s) and subcontractor(s) companies?	GP-0-20-001: III.A.6
12.	☐	☐	☐	Does the SWPPP include all the necessary Contractor Certification Statements and signatures?	GP-0-20-001: III.A.6
13.	☐	☐	☐	Is the SWPPP signed by the permittee?	GP-0-20-001: VII.H.2
14.	☐	☐	☐	Is the SWPPP prepared by a qualified professional (if post-construction stormwater management required)?	GP-0-20-001: III.A.3
15.	☐	☐	☐	Do the SMPs conform to the Enhanced Phosphorus Removal Standards (projects in TMDL watersheds)?	GP-0-20-001: III.B.3

Recordkeeping

	Yes	No	N/A		Citation
16.	☐	☐	☐	Are self-inspections performed as required by the permit (weekly, or twice weekly for >5 acres disturbed)?	GP-0-20-001:IV.C.2.a. & b
17.	☐	☐	☐	Are the self-inspections performed and signed by a qualified inspector and retained on site?	GP-0-20-001:II.C.2.,IV.C.6 & VII.H.3
18.	☐	☐	☐	Do the qualified inspector's reports include the minimum reporting requirements?	GP-0-20-001: IV.C.4
19.	☐	☐	☐	Do inspection reports identify corrective measures that have not been implemented or are recurring?	GP-0-20-001: IV.C.5

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Visual Observations

	Yes	No	N/A		Citation
20.	☐	☐	☐	Are all erosion and sediment control measures installed properly?	GP-0-20-001: VII.L
21.	☐	☐	☐	Are all erosion and sediment control measures being maintained properly?	GP-0-20-001: IV.A.1
22.	☐	☐	☐	Was written authorization issued for any disturbance greater than 5 acres?	GP-0-20-001: II.D.3
23.	☐	☐	☐	Have stabilization measures been implemented in inactive areas per Permit (>5acres) or ESC Standard?	GP-0-20-001: II.D.3.b & III.B.1.f
24.	☐	☐	☐	Are post-construction stormwater management practices constructed/installed correctly?	GP-0-20-001: III.B.2
25.	☐	☐	☐	Has final site stabilization been achieved and temporary E&SC measures removed prior to NOT submittal?	GP-0-20-001: V.A.2
26.	☐	☐	☐	Was there a discharge from the site on the day of inspection?	
27.	☐	☐	☐	Is there evidence that a discharge caused or contributed to a violation of water quality standards?	ECL 17-0501, 6 NYCRR 703.2 & GP-0-20-001: I.D

Water Quality Observations

Describe the discharge(s): location, source(s), impact on receiving water(s), etc.

Describe the quality of the receiving water(s) both upstream and downstream of the discharge:

Describe any other water quality standards or permit violations:

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Additional Comments:

☐ Photographs attached

Overall Inspection Rating: ☐ Satisfactory ☐ Marginal ☐ Unsatisfactory	
Name/Agency of Lead Inspector:	Signature of Lead Inspector:
Names/Agencies of Other Inspectors:	

No Exposure Certification Appendix H

NEW YORK STATE | Department of Environmental Conservation

NO EXPOSURE CERTIFICATION

For High Priority Municipal Facilities

in SPDES MS4 General Permit, GP-0-24-001

The completed No Exposure Certification must be documented in the SWMP Plan.
Please do not submit this form to the Department unless requested.

I. Owner/Facility Information

Owner/Operator Name:		
Mailing Address:	City/State/Zip:	
Contact Name:	Phone No.:	
Facility Name:		
Street Address:	City/State/Zip:	
County:	Latitude:	Longitude:

II. Exposure Checklist

	Are any of the following materials or activities exposed to precipitation, now or in the foreseeable future? (Please check either "Yes" or "No" in the appropriate box.) If you answer "Yes" to any of these questions (1) through (11), you are not eligible for no exposure.	YES	NO
1	Using, storing or cleaning machinery or equipment, and areas where residuals from using, storing or cleaning machinery or equipment remain and are exposed to stormwater		
2	Materials or residuals on the ground or in stormwater inlets from spills/leaks		
4	Material handling equipment (except adequately maintained vehicles)		
5	Materials or products during loading/unloading or transporting activities		
6	Materials or products stored outdoors (except final products intended for outside use [e.g., new cars] where exposure to stormwater does not result in the discharge of pollutants)		
7	Materials contained in open, deteriorated or leaking storage drums, barrels, tanks, and similar containers		
8	Materials or products handled/stored on roads or railways owned or maintained by the discharger		
9	Waste material (except waste in covered, non-leaking containers [e.g., dumpster])		

III. Certification

I certify under penalty of law that I have read and understand the eligibility requirements for claiming a condition of "no exposure" and obtaining an exclusion from SPDES stormwater permitting. I certify under penalty of law that there are no discharges of storm water contaminated by exposure to industrial activities or materialsfrom the industrial facility or site identified in this document (except as allowed under 40 CFR 122.26(g)(2)). I understand that I am obligated to submit a no exposure certification form upon request to the NPDES permitting authority or to the operator of the local municipal separate storm sewer system (MS4) into which the facility discharges (where applicable). I understand that I must allow the SPDES permitting authority, or MS4 Operator where the discharge is into the local MS4, to perform inspections to confirm the condition of no exposure and to make such inspection reports publicly available upon request.

Printed Name:	Title/Position:
Signature:	Date:

Storm Event Data Form **Appendix I**

Visual Monitoring Form

NEW YORK STATE — Department of Environmental Conservation	Storm Event Data Form for SPDES MS4 General Permit, GP-0-24-001

Do not submit this form to the Department; keep this form with the municipal facility's SWPPP and in the MS4 Operator's SWMP Plan.

Permit Number:

N	Y	R	2	0	A			

Facility Name:

Contact First Name:

Contact Last Name:

Contact Phone:

Contact Email:

Storm Event Date:

Storm Duration (in hours):

Rainfall Measurement from Storm Event (in inches):

Date of Last Measurable Storm Event:

Duration Between Storm Event Sampled and End of Previous Measurable Storm (in hours):

Certification

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

Facility Operator First Name (please print or type)

Facility Operator Last Name (please print or type)

/ /

Date

Signature

m

Storm Event Data Form **Appendix I (continued)**

Visual Monitoring Form

NEW YORK STATE OF OPPORTUNITY | Department of Environmental Conservation

Visual Monitoring Form MS4 GP-0-24-001

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

MS4 Operator Permit ID | Facility Name

Outfall Number | Examiner's Name | Examiner's Title

Reporting Year | Rainfall Amount | Qualifying Storm? ◯Yes ◯No | Runoff Source? ◯Rainfall ◯Snowmelt

Date/Time Collected __ / __ / __ __ : __ __ AM / PM | Date/Time Examined __ / __ / __ __ : __ __ AM / PM

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

If yes, describe

2. Is the stormwater clear or transparent? ..... ◯Yes ◯No

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

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

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

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

If yes, describe

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

If yes, describe

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

If yes, describe

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

If yes, describe

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

If yes, describe

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

Municipal Facility Assessment Form Appendix J

NEW YORK STATE Department of Environmental Conservation	Municipal Facility Assessment Form For SPDES MS4 General Permit, GP-0-24-001

Assessments must be conducted by a person with the knowledge and skills to assess conditions and activities that could impact stormwater quality at the facility and evaluate the effectiveness of best management practices required by the SPDES MS4 General Permit (GP-0-24-001).

MS4 Permit ID:	MS4 Operator Name:	
Facility Name:	Facility Type:	Date:
Weather Conditions:		
Is stormwater runoff present during this assessment? ☐ Yes ☐ No		
Comments:		

General		Yes	No
1	Is this a high priority municipal facility?	☐	☐
2	If this is a high priority municipal facility, does the facility qualify for a No Exposure Certification?	☐	☐
3	If this is a high priority municipal facility, is there a completed SWPPP available?	☐	☐
4	Does the facility have any MS4 outfalls?	☐	☐
5	Does the facility have any interconnections?	☐	☐
6	Does the facility have any municipal facility intraconnections?	☐	☐
Comments:			

Good Housekeeping		Yes	No
7	Are paved surfaces free of trash, sediment, and/or debris?	☐	☐
8	Date the paved area was last swept or vacuumed.	☐	☐
9	Do outdoor waste receptacles have covers?	☐	☐
10	Are the waste receptacles emptied on a regular basis?	☐	☐
11	Are there signs of leaks, contaminants or overfilling at the waste receptacle area?	☐	☐
12	Are the following facility areas free of accumulated trash, sediment, debris, contaminants, and spills:	☐	☐
	- Salt storage areas	☐	☐
	- Container storage areas	☐	☐
	- Maintenance areas	☐	☐

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

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

53	Is spill control equipment and absorbents readily available?	☐	☐
54	Are emergency phone numbers posted in conspicuous areas?	☐	☐
55	Are spills contained and cleaned up immediately?	☐	☐
Comments:			

General Material Storage Areas		☐ N/A	Yes	No
56	Are leaking or damaged materials stored inside a building or another type of storm resistance shelter?		☐	☐
57	Are all material stockpiles within containment structures (e.g., concrete barriers, earthen berms) or stored in a manner that does not allow discharge of impacted stormwater?		☐	☐
58	Are used fuel tanks and other scrap metal and parts drained of fluids and stored under cover?		☐	☐
59	Are outdoor containers covered?		☐	☐
60	Are piles of spoils, asphalt, debris, etc. stored under a roof or cover?		☐	☐
61	Are spills of material or debris cleaned up promptly?		☐	☐
62	Are used tire storage piles placed away from storm drains or conveyances?		☐	☐
63	Are tires recycled frequently to keep the number of stored tires manageable?		☐	☐
Comments:				

Stormwater Management		Yes	No
64	Are employees trained on the municipal facility procedures?	☐	☐
66	Are BMPs and treatment structures working as designed?	☐	☐
67	Are BMPs and treatment structures free from debris buildup or overgrown vegetation that may impair function?	☐	☐
68	Catch basins should be cleaned in accordance with the timeframes listed in Part VI.F.3.c.iii. / Part VII.F.3.c.iii, depending on the MS4 Operator type. Based on this, do any catch basins need to be cleaned?	☐	☐
69	Are berms, curbing or other methods used to divert and direct discharges adequate and in good condition?	☐	☐
70	Are rooftop drains directed to areas away from pavement?	☐	☐
Comments:			

Erosion and Sediment Controls		Yes	No
71	Are soil stabilization measures (e.g., seed and mulch, rolled erosion control products) considered in areas that have the potential for significant soil erosion?	☐	☐
72	Are natural buffers maintained around surface waters?	☐	☐
73	Are flow velocity dissipation devices in place at monitoring locations and channel outlets (rock riprap, stone check dams, concrete baffles)?	☐	☐
74	Do controls conform to the NYS Standards and Specifications for Erosion and Sediment Control (2016), or equivalent?	☐	☐

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

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

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NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Division of Water, Bureau of Water Permits
625 Broadway, Albany, New York 12233-3505
P: (518) 402-8111 | F: (518) 402-9029
www.dec.ny.gov

3/2/2024

Re: Acknowledgement of Notice of Intent for Coverage under SPDES General Permit for Municipal Separate Storm Sewer Systems (GP-0-24-001)

Dear Buffalo Sewer Authority,

This is to acknowledge that the New York State Department of Environmental Conservation (DEC) received a complete electronic Notice of Intent (eNOI) for the MS4 Operator:

Buffalo Sewer Authority

Pursuant to 6 NYCRR 750-1.21(d) and Part II of the SPDES MS4 GP, GP-0-24-001, Buffalo Sewer Authority is authorized to discharge stormwater under the terms and conditions of the SPDES MS4 GP, GP-0-24-001, starting on the effective date of **01/03/2024**. Buffalo Sewer Authority must comply with all requirements contained in the MS4 GP, GP-0-24-001.

The following SPDES ID No. should be included in all correspondences with the DEC:

SPDES ID No: NYR20A461

Should you have any questions regarding any aspect of the requirements in the MS4 GP, GP-0-24-001, please contact MS4GP@dec.ny.gov or (518) 402-8111.

Sincerely,

Meredith Streeter

Meredith Streeter, P.E.
Chief, Central Section
Bureau of Water Permit

NEW YORK STATE OF OPPORTUNITY | Department of Environmental Conservation

Staffing Plan/Organizational Chart Appendix L

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BSA MS4 Outfall Inspections & Track Down Staffing Chart

Stage	To Be Completed By:	Process Description:	Deliverables:
MS4 Outfall Inspections	GIS Specialist, Junior Sanitary Engineer or Construction Inspector	MS4 Outfall Inspection is completed, and initial sample is collected if flow is present. Based on the findings of the initial test strips, begin to narrow down a potential source and initiate the track down process.	MS4 outfall inspection report & sample if illicit discharge is present
Initial Track Down Process	Construction Inspector	Utilizing the GIS and initial findings of the sample, the inspector should trace upstream to locate the source by eliminating dry areas.	Confirmation of a suspected contributor or refined area of interest
Official Sample Collection	Industrial Waste Staff	Industrial Waste staff should be called to collect an official sample the same day flow is found. The findings of the initial sample should be provided to IW and Laboratory staff.	Collection of an official sample to be delivered to the laboratory
Laboratory Testing	Laboratory Staff	Laboratory staff perform official testing with any additional parameters based on the suspected contributor. These results should be conveyed to BSA Engineering Staff / Industrial Waste Administrator for next steps.	Official sample testing results
Final Track Down or Identification of Responsible Party	Engineering Staff / Industrial Waste Administrator	With the results of the initial track down & laboratory testing, Engineering Staff / Industrial Waste Administrator should work to identify a potential source.	Identification of a potential source.
Enforcement Response	Engineering Staff/ Industrial Waste Administrator	Appropriate enforcement response is selected and documentation is sent to potential source. Follow up inspections may be required to ensure compliance.	Enforcement response & documentation
Completion of Track Down Report	Engineering Staff	Stormwater Program Coordinator to complete track down report and include in the SWMP documentation.	Track down report

Guide to Utilizing the Online Stormwater Mapper

WNY Stormwater Coalition

PURPOSE:

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

Online mapper Link:

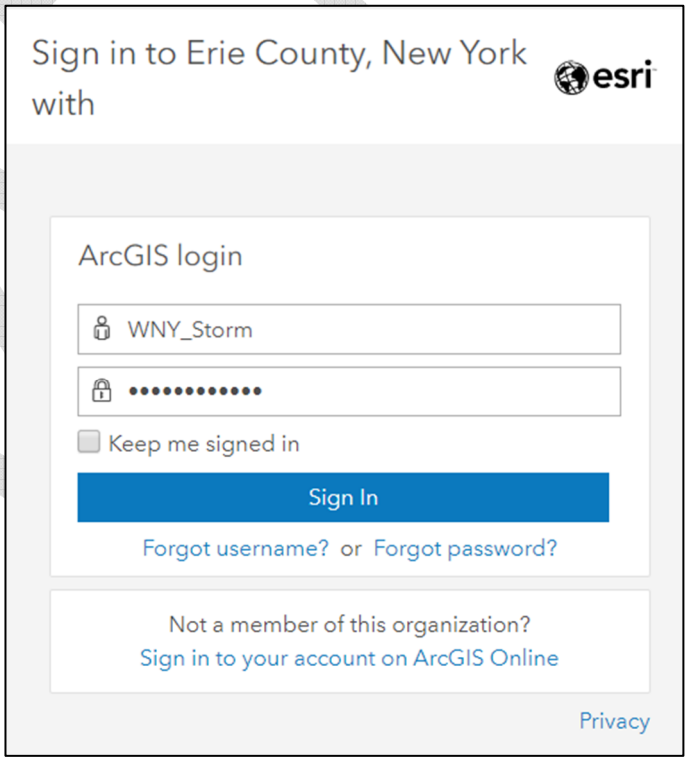
https://erieny.maps.arcgis.com/apps/webappviewer/index.html?id=717984bd03e74f23b0296461e3ea9957

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

Login Credentials:

Username: WNY_Storm

Password: $tormW@ter20



Recommended Web Browsers:

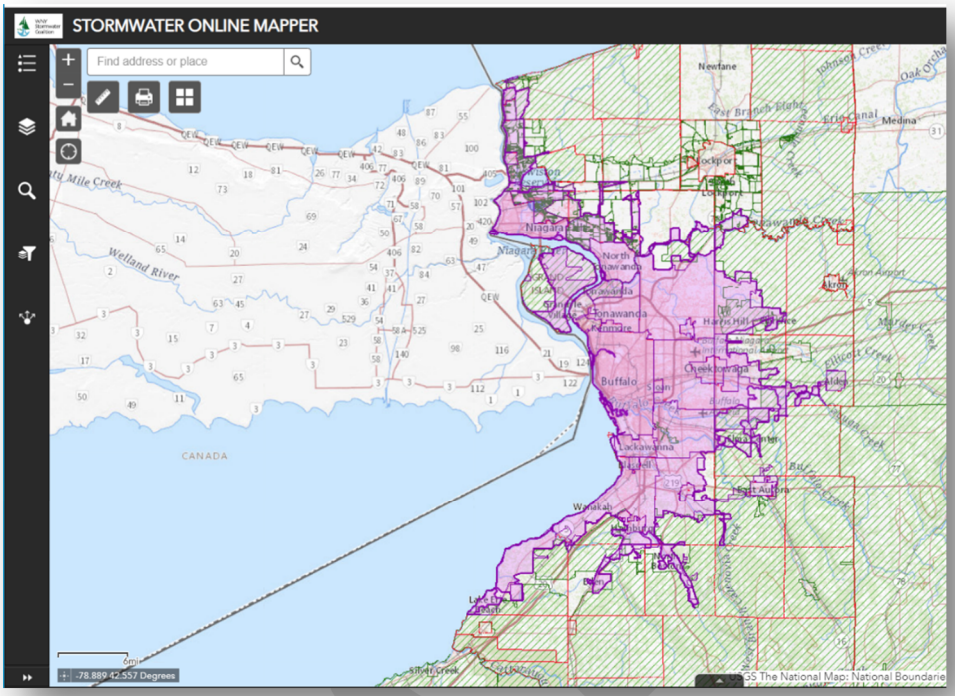
- Google Chrome
- Internet Explorer
- iOS Safari



LEGEND: 

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

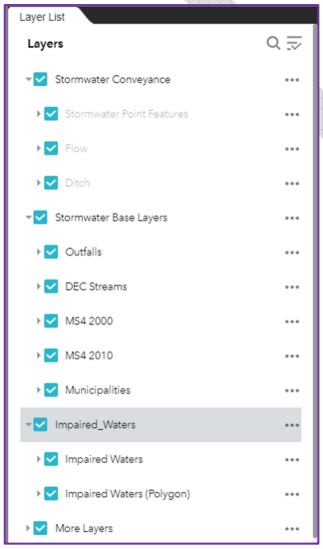
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The Legend is dynamic and will change to show you which layers are active as you zoom in and out of the map. At the default scale you see MS4 boundaries (2000,2010), Municipalities and Areas Without Municipal Sewer are the active layers.



LAYER LIST:



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

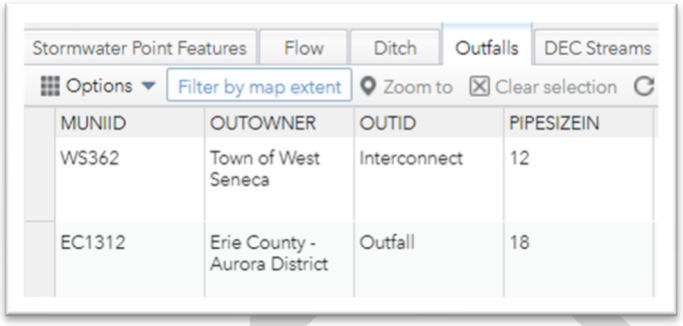


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When you click the three little dots a menu appears:



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



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

SEARCH BY OUTFALL ID:

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

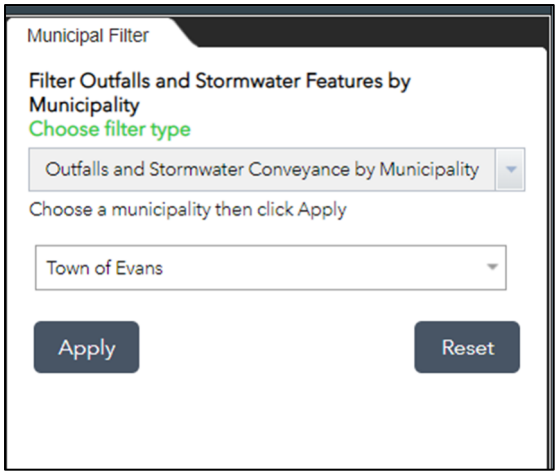


The search box gives you results as you begin to type the outfall ID.

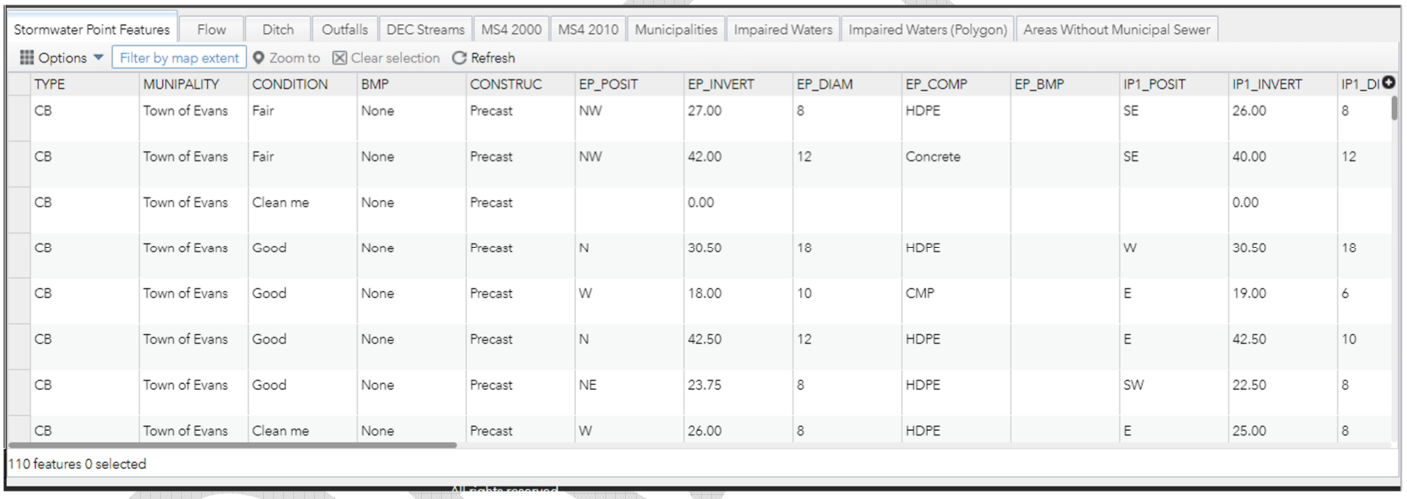


MUNICIPAL FILTER:

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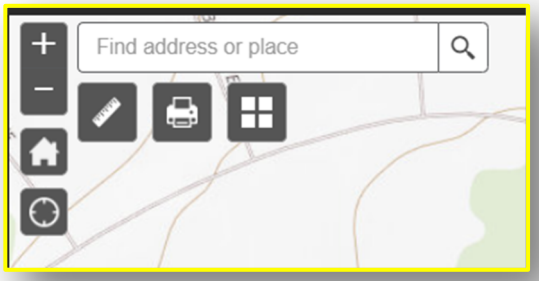
- This widget allows you to apply a filter to all of the stormwater conveyance and outfall data based on municipality.
- Once you select a municipality, click *Apply*. It will zoom to that municipality and the only data showing on the map will be for that particular municipality.
- Depending on the size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



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

OTHER WIDGETS:

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



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



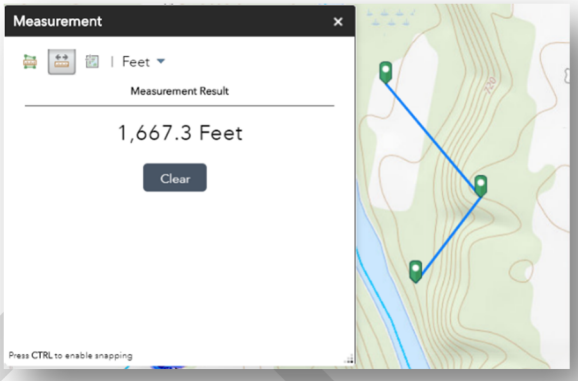
Home Button:
The home button takes you to the default extent of the map.



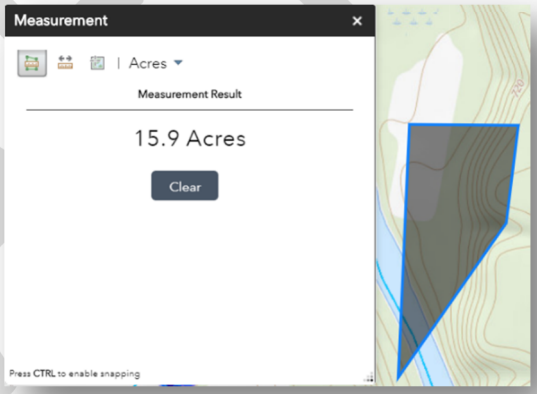
My Location: 
The button uses your device's location when you have it enabled. This is particularly helpful if using the mapper in the field.

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

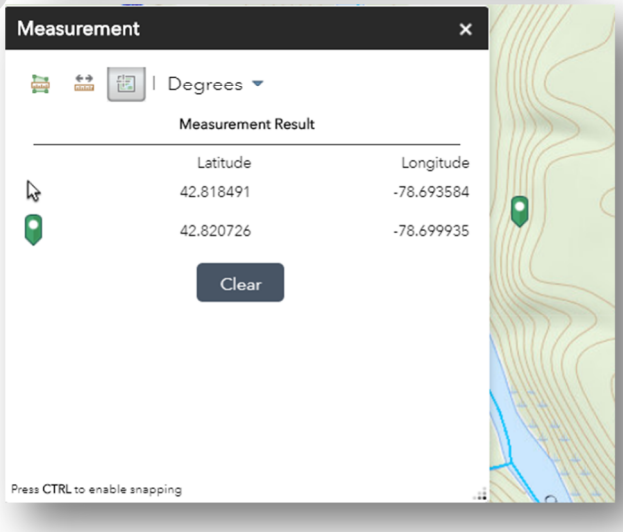
To measure distance, select the middle icon and then single click you starting point and as many points in between your last point. To end your segment, double-click on the last point in your measurement. You can change your measure type from feet to miles etc. in the drop down list.



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



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

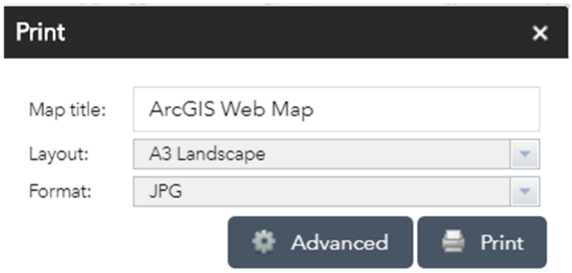


***For all three measurements, you can use <u>CTRL</u>** (on your keyboard) **to enable snapping to features in the map such as manholes, pipes, ditches, outfalls etc This makes tracing polygons very easy**

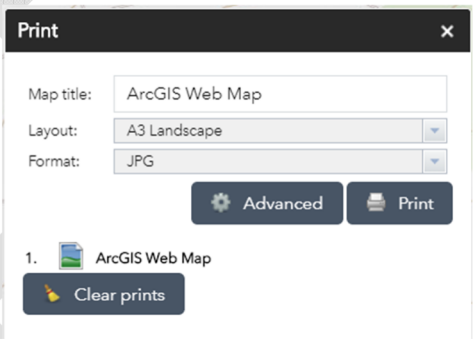
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Printing Widget: 

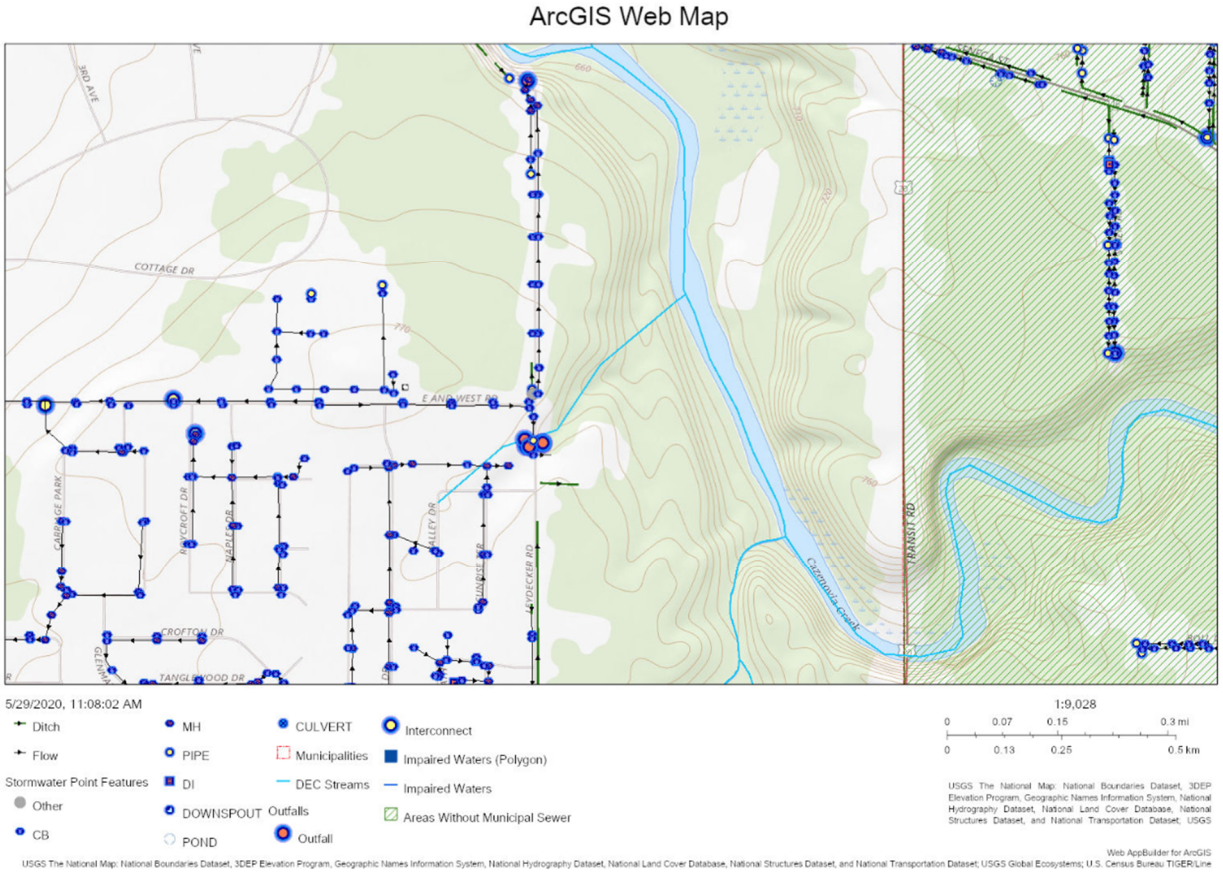
The print widget lets you export the map to various file types to be saved or printed. The current view of the map generates when you click print. The default layout is “A3 Landscape” and default format is JPG. You have the option to select different types in the drop down. You can title your map.



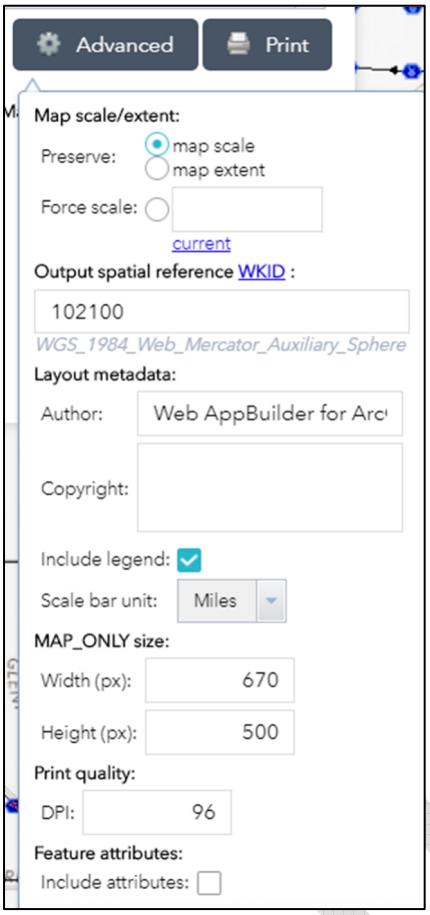
A file is generated after clicking print. To view the file click on the file name. It will open the map in another tab in your browser.



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



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



To start over the print process, select *Clear Prints* button.
The *Advanced* print button lets the user:

-Adjust the map scale/extent

-Edit the spatial reference

-Add an author and copyright to the map

-Option to include the legend

-Change the unit used for the scale bar

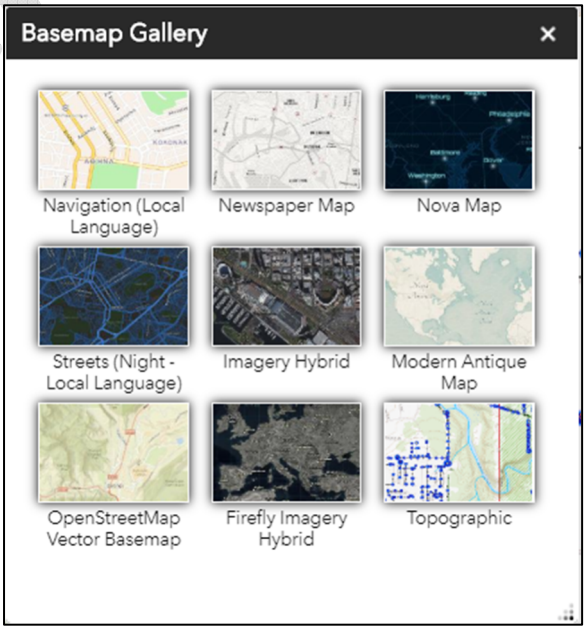
-Edit the size of the map portion of the print

-Change the DPI of the file output

-Option to include attributes in the map

Basemap  *Gallery*:

This lets the user change active basemap used in the mapper. The default basemap is called 'Topographic'
Depending on how you're using the mapper, other basemaps might be more useful than others.



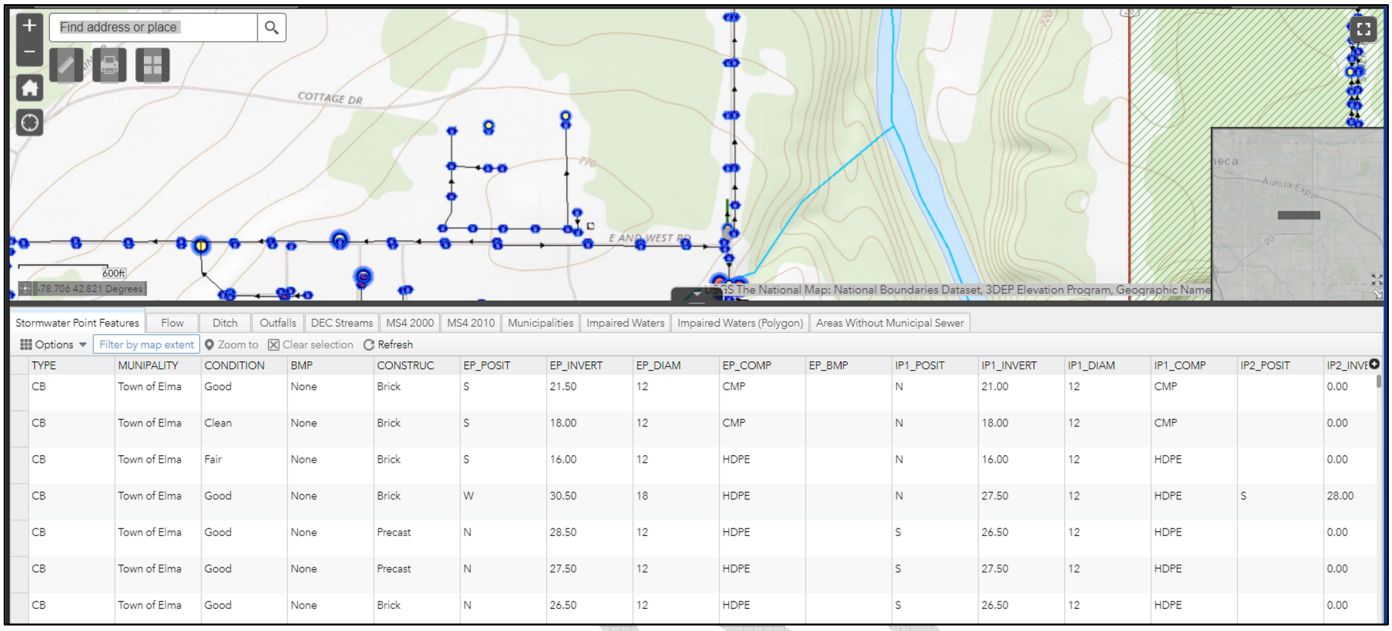
Full Screen: 
This button will set the mapper to fill your entire screen rather than just within your browser.

The Attribute Table:

The attribute table can be pulled up from the bottom of the map screen at any time. All layers that contain attributes can be found in the is table. Each layer has its own tab. By default 'Filter by map extent' is checked. This means that you can

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only see attributes for features that are currently displayed in the map. Feel free to uncheck this setting, but it may slow down you mapper due to the large amounts data stored in each layer.[1]



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

Options | Filter by map extent | Zoom to | Clear selection | Refresh

TYPE	MUNIPALITY	CONDITION	BMP	CONSTRUC	EP_POSIT	EP_INVERT	EP_DIAM	EP_COMP	EP_BMP	IP1_POSIT	IP1_INVERT	IP1_DIAM	IP1_COMP	IP2_POSIT	IP2_INVE
CB	Town of Elma	Good	None	Brick	S	21.50	12	CMP		N	21.00	12	CMP		0.00
CB	Town of Elma	Clean	None	Brick	S	18.00	12	CMP		N	18.00	12	CMP		0.00
CB	Town of Elma	Fair	None	Brick	S	16.00	12	HDPE		N	16.00	12	HDPE		0.00
CB	Town of Elma	Good	None	Brick	W	30.50	18	HDPE		N	27.50	12	HDPE	S	28.00
CB	Town of Elma	Good	None	Precast	N	28.50	12	HDPE		S	26.50	12	HDPE		0.00
CB	Town of Elma	Good	None	Precast	N	27.50	12	HDPE		S	27.50	12	HDPE		0.00
CB	Town of Elma	Good	None	Brick	N	26.50	12	HDPE		S	26.50	12	HDPE		0.00

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Enforcement Response Plan Appendix O

The Enforcement Response Plan (ERP) describes the action(s) to be taken for violations pertaining to MCM 3: Illicit Discharge Detection and Elimination, MCM 4: Construction Site Stormwater Runoff Control, and MCM 5: Post-Construction Stormwater. The ERP provides a protocol to address repeat and continuing violations through progressively stricter responses (i.e., escalation of enforcement) as needed to achieve compliance with the terms and conditions of the MS4 General Permit (GP-0-24-001) and/or Construction General Permit (GP-0-20-001). Enforcement responses are based on the type, magnitude, and duration of the violation, effect of the violation on the receiving water, compliance history of the violator(s), and good faith of the violator(s) in compliance efforts. See subsequent pages for specific illicit discharge, construction, and post-construction stormwater management practice enforcement responses.

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

The **Buffalo Sewer Authority** will use the following types of enforcement responses or combination of responses for illicit discharge, construction, and post-construction stormwater management practice violations:

Customize: you must describe/explain process for all listed below and include the title and department of the person(s) responsible for each enforcement response listed below.

i. Verbal warnings – to be given by the Industrial Waste Department staff;
ii. Written notices – to be given by the Industrial Waste Administrator.
iii. Citations (and associated fines) – to be determined by the Industrial Waste Administrator;
iv. Stop work orders – N/A;
v. Withholding of plan approvals or other authorizations affecting the ability to *discharge* to the *MS4*; and
vi. Additional measures, supported in local legal authorities, such as collecting against the project's bond or directly billing the responsible party to pay for work and materials to correct violations.

Enforcement Tracking

The **Buffalo Sewer Authority** documents instances of non-compliance in this SWMP Plan. The enforcement case documentation includes, at a minimum, the following:

a. Name of the owner/operator of the facility or site of the violation (can be redacted from the publicly available SWMP Plan);

b. Location of the *stormwater* source (e.g., construction project);

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c. Description of the violation;

d. Schedule for returning to compliance;

e. Description of enforcement response used, including escalated responses if repeat violations occur or violations are not resolved in a timely manner;

f. Accompanying documentation of enforcement response (e.g., notices of noncompliance, notices of violations);

g. Any referrals to different departments or agencies; and

h. Date violation was resolved.

All documentation pertaining to Enforcement Response is considered part of tis SWMP Plan and is available upon request: contact Stormwater Program Coordinator or Stormwater Management Officer listed on page 2 of this document J:\Engineer\Stormwater\MS4 Compliance

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

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Enforcement Response Plan: Appendix O (continued)
Construction General Permit

Enforcement Response Plan: Construction General Permit		
Violation	**Issue**	**Minimum Response**
Failure to obtain coverage under the Construction General Permit WITH appropriate erosion & sediment control practices	i) One or more acres of disturbed area ii) One or more acres of disturbed area - violation continued for 30 or more days after discovery iii) One or more acres of disturbed area - violation continued for 60 or more days after discovery	i) Notice of Violation ii) Cease and Desist iii) Formal Enforcement/Fines
Failure to obtain coverage under the Construction General Permit and WITHOUT or MINIMAL erosion & sediment control practices	i) One up to five acres of disturbed area ii) One up to five acres of disturbed area - violation continued for 15 or more days, after discovery iii) One up to five acres of disturbed area - violation continued for 30 or more days after discovery iv) Five or more acres v) Five or more acres - violation continued for 30 or more days after discovery	i) Notice of Violation ii) Cease and Desist iii) Formal Enforcement/Fines iv) Cease and Desist v) Formal Enforcement/Fines
Has coverage under the Construction General Permit and has significant violations of permit	i) One up to five acres of disturbed area ii) Failure to correct deficiencies in accordance with schedule: One up to five acres of disturbed area iii) Five or more acres	i) Warning letter with schedule for correctve action(s) (NOV Optional) ii) NOV and/or Stop Work Order iii) NOV and/or Stop Work Order
Failure to meet significant permit requirements. Including, but not limited to: **- lack of or a substantially inadequate SWPPP;** **- failure to implement or maintain BMPs;** **- failure to perform required inspections**	i) Unsatisfactory compliance inspection ii) Failure to correct deficiencies in accordance with schedule iii) Duration of noncompliance is longer than 60 days.	i) Warning letter with Inspection report listing deficiencies and schedule for correctve action(s) ii) NOV and/or Stop Work Order iii) Formal Enforcement/Fines

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Enforcement Response Plan: Post-Construction Stormwater Management Practice Inspection & Maintenance		
Violation	**Issue**	**Minimum Response**
Failure to perform required inspections and/or submit inspection report. **NYS DEC Stormwater Management Practices Inspection Checklists 2017: https://www.dec.ny.gov/docs/water_pdf/smpinspchklist.pdf**	i) No SMP inspection report submitted ii) No inspection report submitted - violation continued for 30 or more days after notice iii) No inspection report submitted - violation continued for 60 or more days after notice	i) Warning letter with schedule for correction (NOV Optional) ii) NOV iii) Formal Enforcement/Fines
Failure to perform required maintenance as called for in the Maintenance Agreement associated with the post-construction stormwater management practice(s); or, in the absence of a formal Maintenance Agreement, NYS DEC Maintenance Guidance for Stormwater Management Practices 2017: https://extapps.dec.ny.gov/docs/water_pdf/smpmaintguidance.pdf	i) SMP maintenance not performed ii) Maintenance not performed - violation continued for 30 or more days after notice iii) Maintenance not performed - violation continued for 60 or more days after notice	i) Warning letter with schedule for correction (NOV Optional) ii) NOV iii) Formal Enforcement/Fines
Failure to address deficiencies, corrective actions, or further investigation (if recommended in inspection report)	i) Failure to correct SMP deficiencies ii) Failure to correct deficiencies in accordance with schedule: violation continued for 30 or more days after notice iii) Failure to correct deficiencies in accordance with schedule: violation continued for 60 or more days after notice	i) Warning letter with schedule for correction (NOV Optional) ii) NOV iii) Formal Enforcement/Fines

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Part VIII: Enhanced Requirements for Impaired Waters Appendix P

As listed in Appendix B of the MS4 General Permit (GP-0-24-001), the followings waterbodies in Erie and/or Niagara County have segments that are subject to Enhanced Requirements for Impaired Waters. These requirements are to be included in the Minimum Controls Measures of this SWMP Plan by affected municipalities only (see map on next page). The WNYSC will form a committee in early 2025 for affected MS4 municipalities to collaborate on meeting the enhanced requirements.

Erie County

Delaware Park Pond (0101-0026)	Phosphorus
Ellicott Creek, Lower, and tribs (0102-0018)	Phosphorus and Silt/Sediment
Green Lake (0101-0038)	Phosphorus
Lake Erie (Main Lake, North) (0104-0037)	Fecal Coliform
Lake Erie (Northeast Shoreline) (0104-0036)	Fecal Coliform
Rush Creek and tribs (0104-0018)	Fecal Coliform and Phosphorus
Scajaquada Creek, Lower, and tribs (0101-0023)	Fecal Coliform and Oils & Floating Sub. and Phosphorus
Scajaquada Creek, Middle, and tribs (0101-0033)	Fecal Coliform and Oils & Floating Sub. and Phosphorus
Scajaquada Creek, Upper, and tribs (0101-0034)	Fecal Coliform and Phosphorus
South Branch Smoke Cr, Lower, and tribs (0101-0036)	Phosphorus and Silt/Sediment

Niagara County

Bergholtz Creek and tribs (0101-0004)	Fecal Coliform and Phosphorus

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The **Buffalo Sewer Authority** is subject to Enhanced Requirements for Impaired Waters due to the presence of impaired surface waters. Among the MS4 municipalities in Erie and Niagara Counties, one or more of the following stormwater-related pollutants are causing the impairment:

- Phosphorous
- Silt/Sediment
- Pathogens (i.e. fecal coliform)
- Floatables (i.e. oil & floating substances) .

The following surface waters in the **Buffalo Sewer Authority** are identified as “Impaired” by New York State and are subject to enhanced requirements as per the NYSDEC MS4 General Permit (GP-0-24-001). Locals laws to Prohibit Illicit Discharges, Activities and Connections to Separate Storm Sewer System, and for Stormwater Management and Erosion & Sediment Control, help to address the following stormwater-related pollutants: Phosphorous;

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

Silt/Sediment; Pathogens; and Floatables. The illicit discharge local law includes all pollutants discharged to impaired waters because storm sewers and ditches discharging to them are inspected regularly. In the event a pollutant is found to be discharged into a water, listed as impaired for a pollutant, whether detected by sampling or visually, the local law has the enforcement mechanism(s) necessary to eliminate the source. Similarly, for silt/sediment discharges, the Stormwater Management and Erosion & Sediment Control local law has the enforcement mechanisms necessary to eliminate the source generating it.

NYS Impaired Surface Water	Impairment(s) Listed
Delaware Park Pond (0101-0026)	Phosphorus
Scajaquada Creek, Lower, and tribs (0101-0023)	Fecal Coliform and Oils & Floating Sub. and Phosphorus
Scajaquada Creek, Middle, and tribs (0101-0033)	Fecal Coliform and Oils & Floating Sub. and Phosphorus
Scajaquada Creek, Upper, and tribs (0101-0034)	Fecal Coliform and Phosphorus

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

