

Clean Water Act Basics

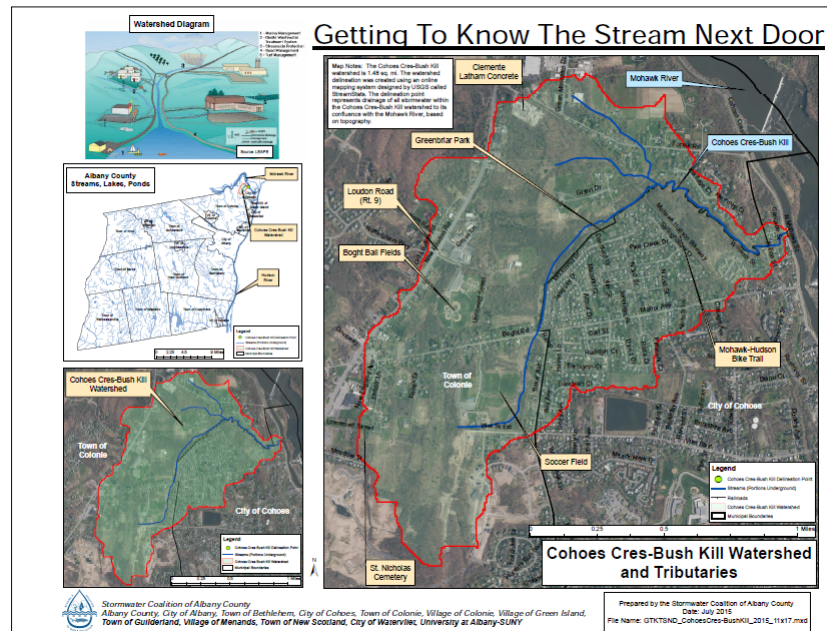
**City of Cohoes
February 9, 2016
Common Council Workshop**

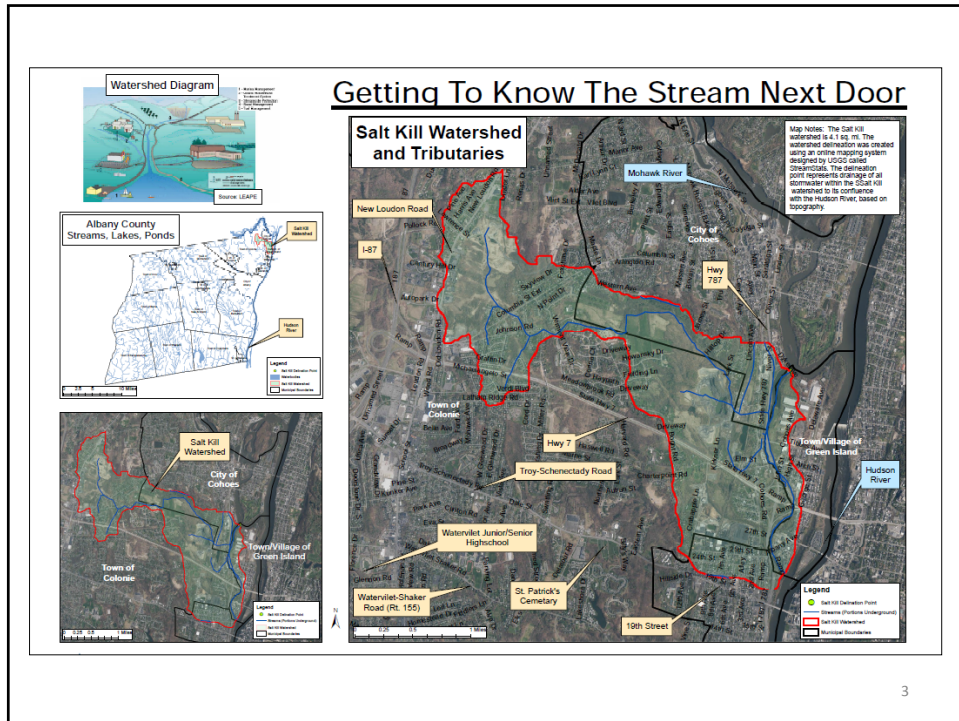


*Nancy Heinzen
Coordinator-Director
112 State Street, Room 720
518-447-5645*

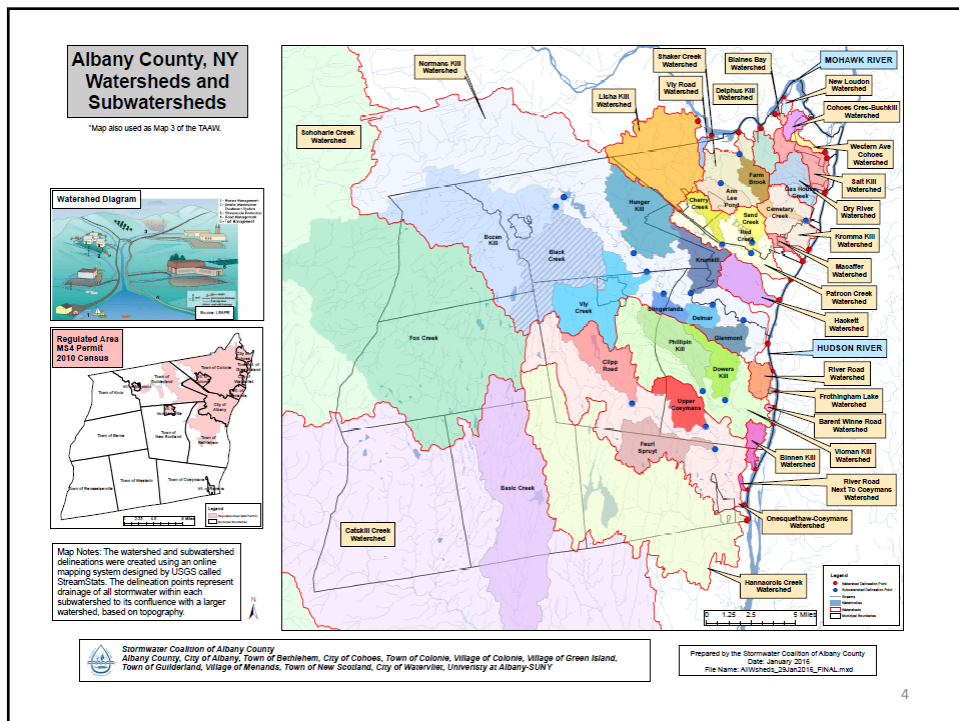
Stormwater Coalition of Albany County
Education, Participation, Compliance

Albany County; City of Albany; Town of Bethlehem; City of Cohoes; Town of Colonie; Village of Colonie; Village of Green Island; Town of Guilderland; Village of Menands; Town of New Scotland; City of Watervliet; University at Albany -SUNY





3



4

How Surface Water Often Travels To Streams

Storm
Drain/Catch
Basin



Conveyance System



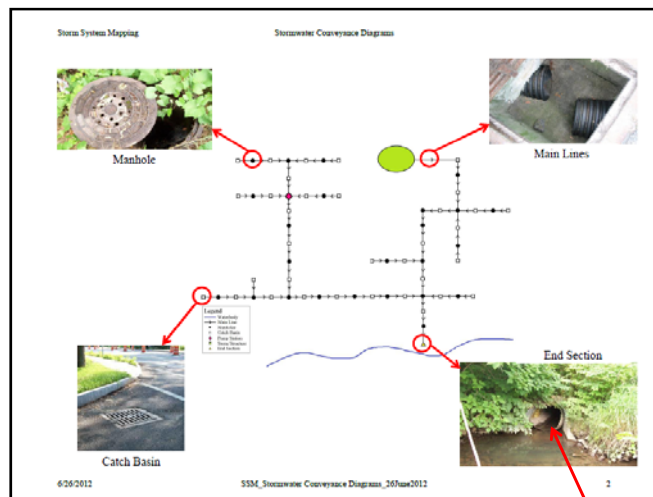
Outfall



Receiving Stream

Urbanized Watershed

5



Outfall

6

Pollutants and land use....

...a close look at a watershed.

7

Where located?

Bacteria & viruses

Broken sanitary lines, failing septic

Gross solids

Trash, cigarette butts, grass clippings

Nutrients

Nitrogen & Phosphorus

Organics

Paint thinner, solvents, cleaners

Sediment

Small particles, suspended in water, transport pollutants

Thermal stress

Water too warm for aquatic life

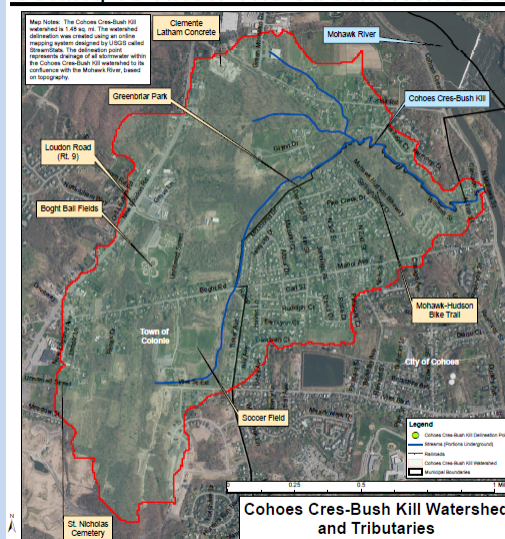
Metals

Lead, cadmium, zinc, nickel

Pesticides & herbicides

Oil and grease

Getting To Know The Stream Next Door



City of Cohoes, Town of Cohoes, Village of Cohoes, Village of Green Island, Scotland, City of Watervliet, University at Albany-SUNY

Prepared by the Stormwater Coalition of Albany County
Date: July 2015
File Name: GTHKTSND_CohoesCres-BushKill_2015_11x17.mxd

8



STORMWATER POLLUTION
(sediment & what else?)

9

Water pollution is regulated.

10

1972 Federal Clean Water Act

Required the regulation of Point Source discharges of pollutants to the "Waters of the U.S."

NPDES Permits (EPA)

National Pollutant Discharge Elimination System Permits

EPA (Federal) authorized NYSDEC (State) to administer the Clean Water Act permit program

SPDES Permits (NYSDEC)

State Pollutant Discharge Elimination System Permits

***Federal and State Clean Water Act laws
Both EPA and NYSDEC can take regulatory action (fines, etc.)***

11

EPA Audit

Town of Colonie MS4 Permit

(NYS SPDES Permit)

September 3, 4, 5, 2013



12

"Waters of the United States"

Classify Streams
"Best Use"

Waterbody Inventory-Priority Waterbody List
"WIPWL"

If a priority waterbody, 303d listing
possible → TMDL
Scientific data to back up listing

13

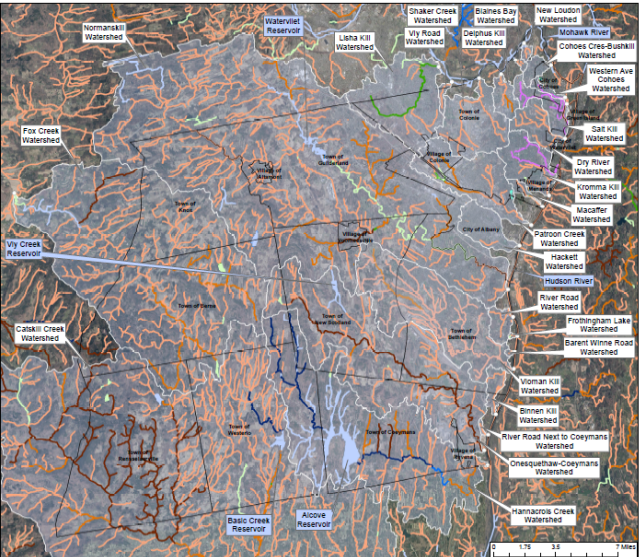
Classify Streams
"Best Use"

Albany County, NY
"Best Use" Waterbody Classification
(Streams, Reservoirs, Lakes,
Ponds, etc...)

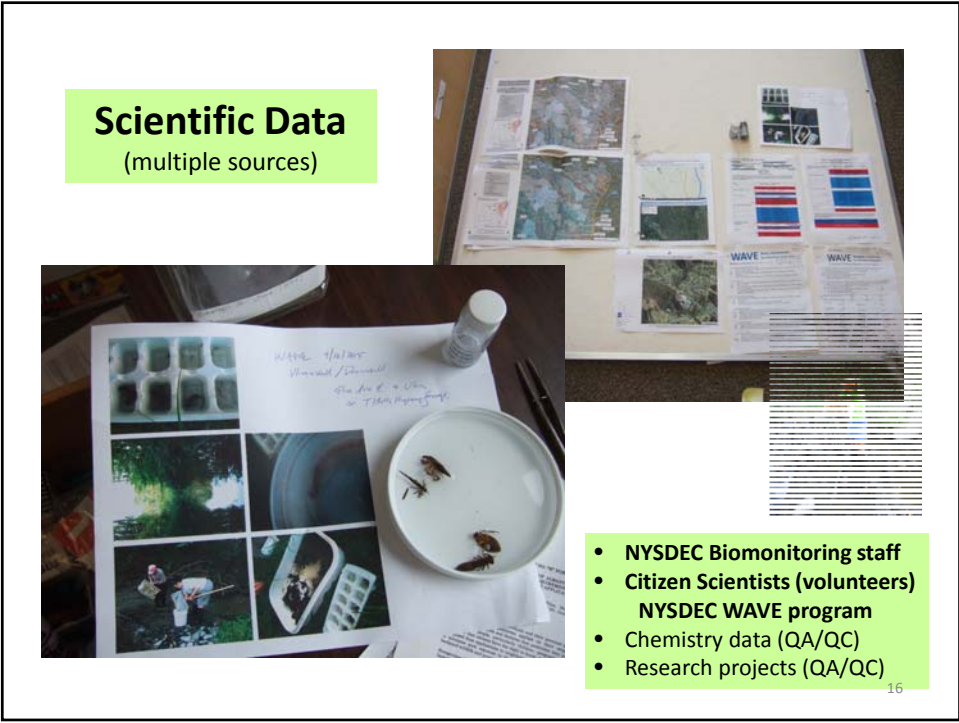
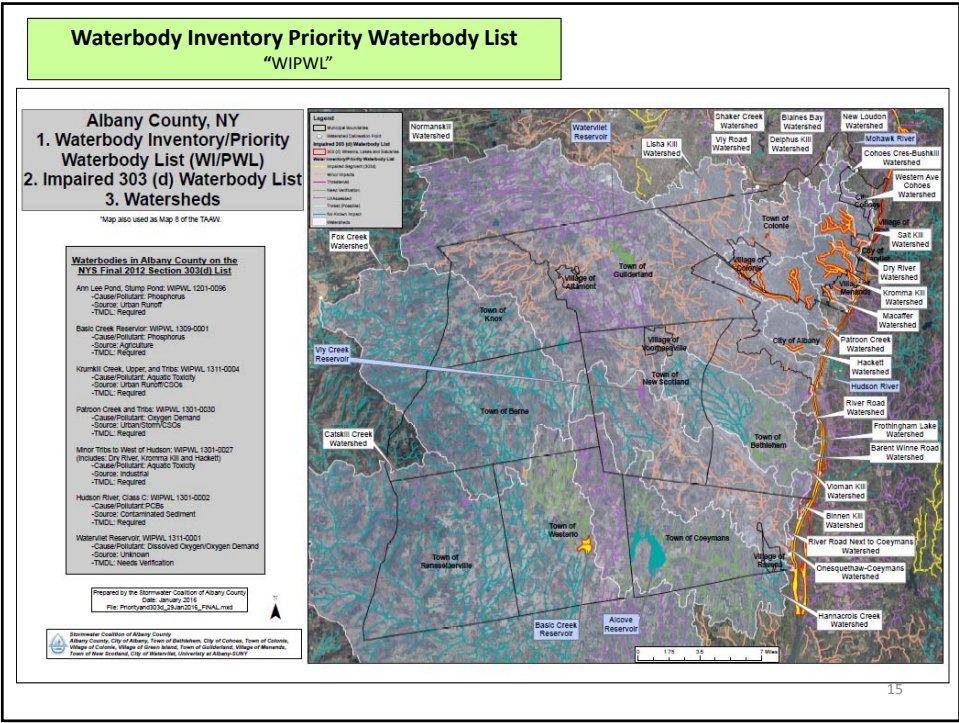
*Map also used as Map 5 of the TMDL

- Legend**
- Watershed Delineation Point
 - Watersheds
 - Municipal Boundaries
 - Waterbody Classification**
 - A Drinking Water
 - A(T) Drinking Water/Trout Habitat
 - A(TS) Drinking Water/Trout Spawning Habitat
 - B Contact Recreation (Swimming)
 - B(T) Contact Recreation/Trout Habitat
 - C Non Contact Activities (Fishing)
 - C(T) Non Contact Activities/Trout Habitat
 - C(TS) Non Contact Activities/Trout Spawning Habitat
 - D Lowest Classification
 - Not Classified

Prepared by the Stormwater Coalition of Albany County
Albany County, City of Albany, Town of Bethlehem, City of Colonie, Town of Colonie,
Village of Colonie, Village of Green Island, Town of Stillwater, Village of Westerlo,
Town of New Scotland, City of Watervliet, University at Albany-SUNY

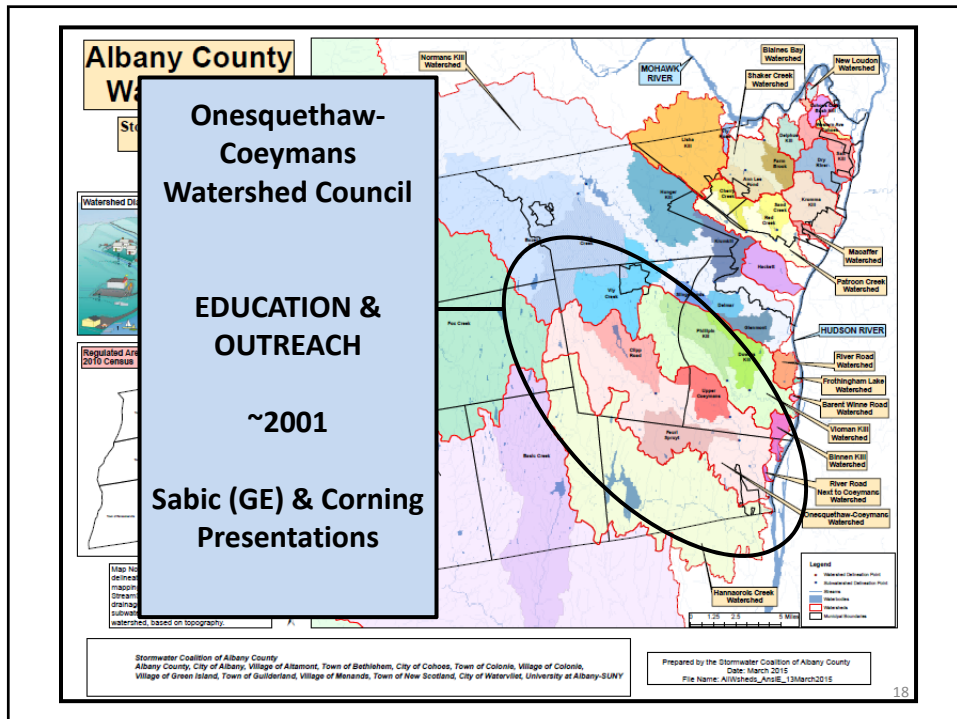


14



“SPDES Permits, huh?”

17



SPDES Permits = permission to discharge into surface water, BUT follow the “rules”.

“Rules” = permit requirements

Unlawful to discharge, unless permitted.

19

ALBANY COUNTY SPDES PERMITS (1980 and 2011)								
Categories	INDIVIDUAL			GENERAL				
Description	Factories; Sewage Treatment Plants	Sanitary Sewer Overflows	Combined Sewer Overflow	Concentrated Animal Feeding Operation (Livestock)	Municipal Separated Storm Sewer System	Land disturbance > 1 acre; During and Post Construction SW Mgmt	Industrial	
		Sanitary	Sanitary + Storm	Stormwater	Stormwater	Stormwater	Stormwater	
Primary Pollutants of Concern (POCs)	Variable; Depends on Type of Facility	Bacteria	Bacteria and Urban Runoff (Multiple POCs)	Nutrients	Urban Runoff (Multiple POCs), Flow	Sediment; Phosphorus, Nitrogen, Flow	Variable, Depends On Type of Facility or Sector, as defined in Permit	
# of SPDES Permits in Albany County	EPA Major (Classes 03, 05) State Significant Minor (Classes 01, 07, 09)	State Non-Significant Minor (Classes 02, 04)						
1980 (Total=25)	21	no data	1	3	0	0	0	0
2011 (Total=477)	53	100	1	4	3	15	252 (active); 251 (terminated)	49 (active); 22 (no exposure); 19 (terminated)
Permit "Owner-Operator"	Factory Owner; Sewage Treatment Plant Owner (Public and Private Sector)	Factory Owner; Sewage Treatment Plant Owner (Private Sector)	Owner of Sanitary System	Municipality Where CSO is Located	Owner of Livestock Operation	Owner of Public Storm System (Municipality; County; Public University; Community College; Authority; State Roads; Mandated Oversight of Construction Activity Permit	Anyone disturbing > 1 acre of land (ex. developer; County/Town/Village/State road project; homeowner additions to house, etc.)	Anyone who owns a facility which qualifies as a regulated sector as described in the Permit
County or Local Municipality Enforcement Action and Fines	NA					MS4 will take enforcement in the areas under MS4 authority.	NA	
NYS Environmental Conservation Law Enforcement Action and Fines	The enforcement action take depends on the violation. The procedure for enforcement is described in the NYSDEC TOGS 1.4.2 Compliance and Enforcement of State Pollutant Discharge Elimination System (SPDES) Permits. Standard Permit Conditions: Failure of the covered entity, its contractors, sub-contractors, agents and/or assigns to strictly adhere to any of the SPDES General Permit requirements contained herein shall constitute a permit violation. There are substantial criminal, civil, and administrative penalties associated with violating the provisions of this permit. Fines up to \$37,500 per day for each violation and imprisonment for up to fifteen (15) years may be assessed depending upon the nature and degree of the offense. (All SPDES Permits have this language)							
Federal Clean Water Act-Enforcement Action and Fines	Depends on violation and EPA's enforcement procedures for a given program. Penalties are not calculated until compliance is achieved.							

Note: Data compiled by NYSDEC Region 4 staff for the Stormwater Coalition of Albany County (December 9, 2011)

20

Regulatory outfalls...

(Point of discharge)

- located in the field → match to a particular type of SPDES permit
- can be found above ground, edge of water body, under water, discharge point to another municipality
- associated with distinct system infrastructure (wastewater-sanitary, wastewater-industrial, combined sanitary storm, storm only)
- allowable discharges often depends on status of receiving water
- SPDES Permit anxiety!** (For MS4 Permittees 2003→) [>3000 outfalls-all MS4s; MS4s yoked w/ Construction Activity Permit compliance; municipal owned facilities-MSGP coverage?; audit threats; constant change]



Individual Permit
Factories, Wastewater Treatment Plants, Complex Facility
OUTFALLS
(Discharge Treated Liquid Waste)



Individual Permit
COMBINED SEWER OVERFLOW OUTFALL
CSO Permit



General Permit
STORMWATER OUTFALL
MS4-Municipal Separated Storm Sewer System Permit



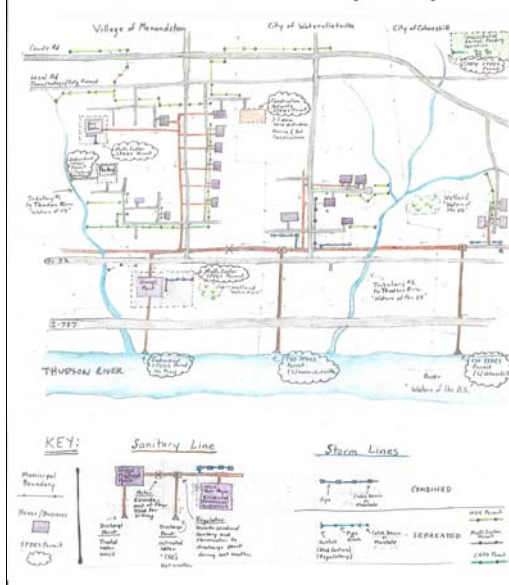
General Permit
STORMWATER OUTFALL
Construction Activity Permit



General Permit
STORMWATER OUTFALL
Multi-Sector Permit
Industrial Site—Landfill "MSGP" Permit

21

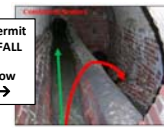
SPDES Permits Concept Map



Individual Permit
Factories, Wastewater Treatment Plants, Complex Facility
OUTFALLS
(Discharge Treated Liquid Waste)



Individual Permit
"CSO" OUTFALL
"R" Overflow structure→



General Permit
STORMWATER OUTFALL
MS4-Municipal Separated Storm Sewer System Permit



General Permit
STORMWATER OUTFALL
Construction Activity Permit



General Permit
STORMWATER OUTFALL
Multi-Sector Permit
Industrial Site—Landfill "MSGP" Permit

22

Potential Liability

SPDES Permittees face legal action and penalties for failure to implement Permit requirements



- Action to recover damages from private property losses;
- Citizen suits under Section 505 of the Federal Clean Water Act.
- Fines: \$37,500 per violation per day

NYSDEC Division of Water Technical and Operational Guidance Series (1.4.2)
COMPLIANCE & ENFORCEMENT OF SPDES PERMITS Dated: June 24, 2010

23

New York State Department of Environmental Conservation
 Division of Water
 625 Broadway, Albany, New York 12233-3506
 Phone: (518) 402-8177 FAX: (518) 402-8082



Alexander B. Granis
 Commissioner

MEMORANDUM

*** NOTICE ***

This document has been developed to provide Department of Environmental Conservation staff with guidance on how to ensure compliance with statutory and regulatory requirements, including case law interpretations, and to provide consistent treatment of similar situations. This document may also be used by the public to gain technical guidance and insight regarding how the Department staff may analyze an issue and factors in their consideration of particular facts and circumstances. This guidance document is not a final rule under the State Administrative Procedure Act section 102.2(b)(6). Furthermore, nothing set forth herein prevents staff from varying from this guidance as the specific facts and circumstances may dictate, provided staff's actions comply with applicable statutory and regulatory requirements. This document does not create any enforceable rights for the benefit of any party.

Date: JUN 24 2010
 TO: Regional Water Engineers, Bureau Directors, Section Chiefs
 SUBJECT: Division of Water Technical and Operational Guidance Series (1.4.2)
 COMPLIANCE AND ENFORCEMENT OF SPDES PERMITS
 (Originator: Meredith Streeter/Karen Baker)

I. PURPOSE

This document establishes the Division of Water's (DOW) guidance on compliance and enforcement activities related to the State Pollutant Discharge Elimination System (SPDES) program. It provides DOW staff with enforcement options and operating guidelines to implement the compliance component of the program.

The goal of this guidance is to ensure consistent statewide understanding and implementation of the SPDES compliance and enforcement program in order to protect public health and the intended best use of the waters of the state. This guidance supercedes Division of Water Technical and Operational Guidance Series (1.4.2) Compliance and Enforcement of SPDES Permits, dated September 30, 1988.

"TOGS"

**NYSDEC Division of Water
 Technical and Operational
 Guidance Series (1.4.2)**

**COMPLIANCE AND
 ENFORCEMENT OF SPDES
 PERMITS**

Date: June 24, 2010

24

<p style="text-align: center;">Division of Water</p> <p style="text-align: center;">Technical & Operational Guidance Series (TOGS) 1.4.2</p> <p style="text-align: center;">Compliance and Enforcement of State Pollutant Discharge Elimination System (SPDES) Permits</p>	<p style="text-align: center;">Table of Contents</p> <table> <tr> <th>DESCRIPTIONS</th><th>PAGE</th></tr> <tr><td>Abbreviations and Acronyms</td><td>1</td></tr> <tr><td>Section I - Guidance</td><td>2</td></tr> <tr><td>Section II - Compliance Evaluation</td><td>3</td></tr> <tr><td>Section III - Compliance Tools</td><td>5</td></tr> <tr><td>Appendix A - SPDES Compliance and Enforcement Response Guide</td><td>10</td></tr> <tr><td> Violations of Individual SPDES Permit Requirements</td><td>11</td></tr> <tr><td> Violations of General SPDES Permit Requirements - CAFO</td><td>17</td></tr> <tr><td> Violations of General SPDES Permit Requirements - MS4</td><td>19</td></tr> <tr><td> Violations of General SPDES Permit Requirements - Construction Stormwater</td><td>21</td></tr> <tr><td> Violations of General SPDES Permit Requirements - MSGP</td><td>24</td></tr> <tr><td> Violations of General SPDES Permit Requirements - Groundwater</td><td>26</td></tr> <tr><td> Violations of CSO Requirements</td><td>28</td></tr> <tr><td> Violations of SSO Requirements</td><td>29</td></tr> <tr><td>Appendix B - SPDES Penalty Guidance</td><td>30</td></tr> <tr><td>Appendix C - Base Penalty Tables</td><td>35</td></tr> <tr><td> Violations of Individual SPDES Permit Requirements</td><td>35</td></tr> <tr><td> Violations of General SPDES Permit Requirements - CAFO</td><td>39</td></tr> <tr><td> Violations of General SPDES Permit Requirements - MS4</td><td>41</td></tr> <tr><td> Violations of General SPDES Permit Requirements - Construction Stormwater</td><td>42</td></tr> <tr><td> Violations of General SPDES Permit Requirements - MSGP</td><td>44</td></tr> <tr><td> Violations of General SPDES Permit Requirements - Groundwater</td><td>46</td></tr> <tr><td>Appendix C - Environmental Significance Multipliers</td><td>47</td></tr> <tr><td>Appendix D - Penalty Adjustment Factors</td><td>48</td></tr> <tr><td>Definitions</td><td>50</td></tr> </table>	DESCRIPTIONS	PAGE	Abbreviations and Acronyms	1	Section I - Guidance	2	Section II - Compliance Evaluation	3	Section III - Compliance Tools	5	Appendix A - SPDES Compliance and Enforcement Response Guide	10	Violations of Individual SPDES Permit Requirements	11	Violations of General SPDES Permit Requirements - CAFO	17	Violations of General SPDES Permit Requirements - MS4	19	Violations of General SPDES Permit Requirements - Construction Stormwater	21	Violations of General SPDES Permit Requirements - MSGP	24	Violations of General SPDES Permit Requirements - Groundwater	26	Violations of CSO Requirements	28	Violations of SSO Requirements	29	Appendix B - SPDES Penalty Guidance	30	Appendix C - Base Penalty Tables	35	Violations of Individual SPDES Permit Requirements	35	Violations of General SPDES Permit Requirements - CAFO	39	Violations of General SPDES Permit Requirements - MS4	41	Violations of General SPDES Permit Requirements - Construction Stormwater	42	Violations of General SPDES Permit Requirements - MSGP	44	Violations of General SPDES Permit Requirements - Groundwater	46	Appendix C - Environmental Significance Multipliers	47	Appendix D - Penalty Adjustment Factors	48	Definitions	50
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25

MS4 General Permit

F. Municipal Separate Storm Sewer Systems (MS4s) General Permit

Violation	Base Penalty Rate
Failure to renew or transfer coverage under the General Permit	\$1000/month
Failure to apply for coverage under the MS4 General Permit for traditional MS4	\$5,000/event
Failure to apply for coverage under the MS4 General Permit for non-traditional MS4	\$1,000/event
Failure to develop and implement a Storm Water Management Program (SWMP)	\$3000/event
Failure to submit Annual Compliance Status Report and/or Municipal Compliance Certification Form	\$3000/event
Causing or contributing to a Water Quality Standards violation	\$5000/event
Failure to meet major permit milestone	\$250/day
Failure to meet other (non-major) milestone or other non-significant permit violations	\$100/day
Significant unauthorized discharge (refer to draft EPA Wet Weather SNC Policy <i>et seq.</i>)	\$3000/event
Unauthorized discharge	\$1,000/event
Significant permit requirement violations including but not limited to: <ul style="list-style-type: none"> • Lack of or a substantially inadequate SWPPP or SWMP; • Substantial failure to implement or maintain BMPs, or • Substantial failure to perform required monitoring 	\$3,000/event
Failure to submit required report (including failure to respond to an information request)	\$500/month
Failure to retain records as required	\$500/event
Failure to allow inspection/sampling by the Department	\$5,000/event
Falsifying information on DEC submittal ⁴⁰	\$10,000/report
Failure to comply with other (not specifically noted in this Appendix) applicable requirements set forth in 6 NYCRR Part 750-2, "Operating in Accordance with a SPDES Permit"	\$100/day
ECL Article 17 violations not related to permit	\$250/day

⁴⁰ The penalty calculated based on this Base Penalty Rate and the maximum adjustment factors may exceed the statutory limitation (currently \$37,500 per day per violation.) A separate calculation for this violation using the case specific adjustment factors should be performed first. If the assessed penalty exceeds the statutory limitation, the penalty assessed for this violation must be changed to the statutory maximum.

Page -41-

26

26

Construction Activity General Permit

G. Construction Stormwater General Permit

Violation	Base Penalty Rate
Failure to obtain coverage under General Permit and is employing appropriate erosion & sediment control practices	< 5 acres (or 5,000 sq ft - 1 acre for east of Hudson in the New York City Watershed (NYCW)) \$1,000/day ≥ 5 acres (or > 1 acre for east of Hudson in the NYCW) \$1,500/day
Failure to obtain coverage under General Permit and is employing minimal or no erosion & sediment control practices	< 5 acres (or 5,000 sq ft - 1 acre for east of Hudson in the NYCW) \$1,500/day ≥ 5 acres (or > 1 acre for east of Hudson in the NYCW) \$3,000/day
Failure to develop and implement a SWPPP	\$3000/event
Has coverage under General Permit, and has significant permit violations including but not limited to: - Substantial failure to implement or maintain BMPs	< 5 acres (or 5,000 sq ft - 1 acre for east of Hudson in the NYCW) \$1,000/day ≥ 5 acres (or > 1 acre for east of Hudson in the NYCW) \$2,500/day

Page -42-

27

Has coverage under General Permit, and has non-significant permit violations	< 5 acres (or 5,000 sq ft - 1 acre for east of Hudson in the NYCW) \$500/day ≥ 5 acres (or > 1 acre for east of Hudson in the NYCW) \$1,000/day
Significant unauthorized discharge (refer to draft EPA Wet Weather SNC Policy <i>et seq.</i>)	\$3,000/event
Unauthorized discharge	\$1,000/event
Causing or contributing to a Water Quality Standards violation	\$5,000/event
Failure to meet major milestones required in a permit or administrative or judicial order	\$250/day
Failure to meet other (non-major) milestone or other non-significant permit violations	\$100/day
Failure to submit required report (including failure to respond to an information request)	\$500/month
Failure to retain records as required	\$500/event
Failure to allow inspection/sampling by the Department	\$5,000/event
Falsifying information on DEC submittal ⁴¹	\$10,000/report
Failure to comply with other (not specifically noted in this Appendix) applicable requirements set forth in 6 NYCRR Part 750-2, "Operating in Accordance with a SPDES Permit"	\$100/day
ECL Article 17 violations not related to permit	\$250/day

⁴¹ The penalty calculated based on this Base Penalty Rate and the maximum adjustment factors may exceed the statutory limitation (currently \$37,500 per day per violation.) A separate calculation for this violation using the case specific adjustment factors should be performed first. If the assessed penalty exceeds the statutory limitation, the penalty assessed for this violation must be changed to the statutory maximum.

Page -43-

28

Multi-Sector General Permit

“Industrial
Permit”

“MSGP”

H. Multi-Sector General Permit (MSGP)

Violation	Base Penalty Rate
Failure to renew or transfer coverage under General Permit	\$1,000/month
Failure to apply for coverage under the General Permit	\$3,000/event
Failure to submit DMR or Annual Certification Report	\$1,000/event
Failure to develop and implement a SWPPP or SWMP	\$3,000/event
Causing or contributing to a Water Quality Standards violation	\$5,000/event
Significant unauthorized discharge (refer to draft EPA Wet Weather SNC Policy <i>et seq.</i>)	\$3,000/event
Unauthorized discharge	\$1,000/event
Failure to meet significant permit requirements including but not limited to: <ul style="list-style-type: none"> Substantially inadequate SWPPPs; Substantial failure to develop or implement the SWPPP; Substantial failure to implement or maintain BMPs; Substantial failure to implement MSGP requirements. 	\$3,000/event
Exceeding interim or final effluent limits for non-toxic parameter under SPDES permit: <ul style="list-style-type: none"> Daily max/min discharge (each day = 1 violation⁴¹ = 1 event) Daily Average (7 day average = 7 violations⁴² = 1 event) Daily Average (30 day average = 30 violations⁴³ = 1 event) or Monthly Average 	\$1,000/event \$1,500/event \$2,000/event
Exceeding interim or final limits for toxic parameter under SPDES permit: <ul style="list-style-type: none"> Daily max/min discharge (each day = 1 violation = 1 event) Daily Average (7 day average = 7 violations⁴² = 1 event) Daily Average (30 day average = 30 violations⁴³ = 1 event) or Monthly Average 	\$2,000/event \$3,000/event \$4,000/event
Failure to meet major milestones required in a permit or administrative order or judicial decree	\$250/day
Failure to meet other (non-major) milestone or other non-significant permit violations	\$100/day

⁴¹Exceedence of the 7-day average constitutes seven violations. 7-day average, as defined in 40CFR133.101(a), is “the arithmetic mean of pollutant parameter values of samples collected in a period of 7 consecutive days.”

⁴²Exceedence of the 30-day average constitutes thirty violations. Legal precedence for this has been established by federal court rulings. The 30-day average, as defined, in 40CFR133.101(b), is “the arithmetic mean of pollutant parameter values of samples collected in a period of 30 consecutive days.”

Page -44-

29

Failure to submit required report (including failure to respond to an information request)	\$500/month
Failure to retain records as required	\$500/event
Failure to allow inspection/sampling by the Department	\$5,000/event
Falsifying information on DEC submittal ⁴⁴	\$10,000/report
Failure to comply with other (not specifically noted in this Appendix) applicable requirements set forth in 6 NYCRR Part 750-2, “Operating in Accordance with a SPDES Permit”	\$100/day
ECL Article 17 violations not related to permit	\$250/day

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Page -45-

30

Combined Sewer Overflow Requirements

N. Violation of Combined Sewer Overflow (CSO) Requirements:

Violations	Circumstance	Department's Minimum Response
Multiple significant unauthorized discharges or multiple significant overflows (refer to draft EPA Wet Weather SNC Policy et seq.)	All (permitted and unpermitted outfalls)	Consult with DEC law enforcement or legal to assess potential criminal prosecution or civil enforcement.
Substantial failure to implement any of the nine minimum controls (NMCs) as required in an administrative or judicial order or in a permit.	i) 30 days overdue	i) NOV
	ii) More than 60 days overdue	ii) Formal Enforcement
Failure to report overflow(s) or discharge(s) at permitted CSOs in Annual BMP Report as required in an administrative or judicial order or in a permit.	All	NOV
Failure to submit an approvable Long Term Control Plan (LTCP), as required in an administrative order, judicial decree, or in a permit.	i) 30 days overdue	i) NOV
	ii) More than 60 days overdue	ii) Formal Enforcement
Failure to meet and implement the major milestones (including LTCP milestones) or reporting requirements (including failure to respond to an information request) required in an administrative order, judicial decree, or in a permit.	i) 30 days overdue	i) NOV
	ii) More than 60 days overdue	ii) Formal Enforcement
Failure to comply with incident reporting requirements pursuant to Part 750-2.6 and Part 750-2.7. This includes failure to report overflow(s) or discharge(s) at unpermitted CSOs.	All	NOV
Reporting false information	All	Consult with DEC law enforcement or legal to assess potential criminal prosecution or civil enforcement.

Page -28-

31

MS4 Permit detour?

(Time permitting....)

32

MS4 Permit – The “Big Picture”

[Minimum Control Measures & TOGS “permit milestones”]

1. Where are outfalls located? Related infrastructure? Type of outfall (intermunicipal? direct discharge to stream?) # of outfalls to inventory? Evidence of pollution? (MCM 3, MCM 6)
2. If pollution, why? Human behavior? Cross connections? (MCM 1, 2, 3)
3. How to change those behaviors? Public education & participation (MCM 1, 2)
4. If behaviors don’t change, then what? (Local Laws: MCM 3, 4, 5)
5. Sediment – key pollutant, muddies waters, transports pollutants. Mandated MS4 oversight of Construction Activity Permit (design of sw practices, construction erosion-sediment control, maintenance of post construction practices) (MCM4, 5)
6. Municipalities/MS4s lead by example
 - Oversight of MS4 owned facilities (MCM 6)
 - Oversight of construction activity (MCM 4, 5). SWPPP Review & Acceptance During construction-Erosion & Sediment Control (“NYSDEC Blue Book”) Post Construction Practices (NYSDEC Stormwater Mgmt Design Manual)
7. Record-keeping, standard operating procedures, inter-departmental communication, staff training...develop and maintain a stormwater program (MCM 1-6)

35

MS4 Permit

(Minimum Control Measures-MCMs)

MCM 1 Public Education and Outreach
 MCM 2 Public Involvement & Participation
 MCM 3 Illicit Discharge Detection and Elimination
 MCM 4 Construction Site Runoff Control
 MCM 5 Post Construction Stormwater Management
 MCM 6 Pollution Prevention & Good Housekeeping for
 Municipal Operations

36

EPA Audits
Local MS4 Permit Compliance
(Coalition members)

Town of Colonie: June 3-5, 2013
City of Albany: Sept 3-5, 2014
University at Albany-SUNY Uptown: March 19, 2015

Recent NYSDEC Audits (1 day)

V/Menands (12/6/2012); T/New Scotland (2/11/2014);
C/Cohoes (7/16/2014); V/Colonie (1/21/2015)

37

Town of Colonie (EPA)





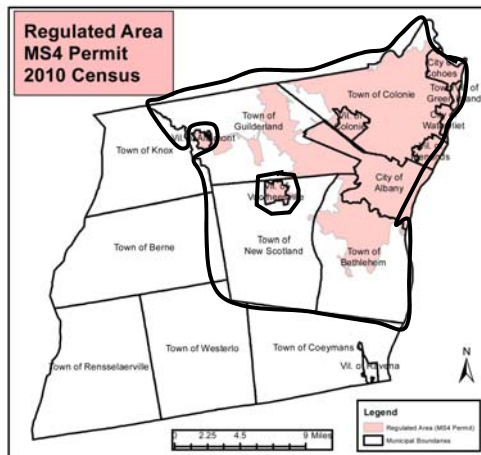
University at Albany-Uptown (EPA)



Stormwater Coalition of Albany County detour?

(Time permitting....)

Stormwater Coalition of Albany County



REGULATED MS4s

Traditional

Cities:
Cohoes (CSO)
Watervliet (CSO)
Albany (CSO)

Coalition Members (As of 2016)

Towns:
Colonie
Guilderland
Bethlehem
New Scotland

Villages:
Colonie
Green Island (CSO)
Menands

County:
Albany

Non-Traditional
SUNY-Albany

Public Schools
NYS DOT
Thruway Authority

43

Stormwater Coalition of Albany County

- **Formed via Intermunicipal Agreement (IMA)**—Start date: October 15, 2008; 2016 IMA renewal
- **Purpose**--same MS4 General SPDES Permit requirements→ so, share services; clearinghouse; joint reports, mapping, administration, training, apply for, implement, and manage grants
- **IMA participants**—original co-signatories, same MS4s involved with 2 NYSDEC grants (2005 to 2009, had pre-existing history of working together); open to non-MS4s
- **2016 Coalition Operating Budget**--\$179,962 (2016 Add'l \$482,720 NYSDEC Grant Map'g, Prog Mgmt)
- **Membership Fee Range** --\$4,710 to \$28,909
- **Albany County**--Host and Member of Coalition
- **Office location**--Albany County Building-Downtown; 112 State Street; Rm 720
- **Organizational structure**
 - Board of Directors:** 1 rep per municipality; appointed by municipal Governing Board; open meetings law; fiscal responsibilities; meets quarterly (V. of Green Is)
 - Working Group:** Multiple reps per MS4; conducts "work" of the Coalition; meets monthly (location changes, mtgs in each member community, if possible)
 - Staff:** 1 FT SW Program Coordinator; 1 FT SW Program Technician
- **Membership History**--Annual Decision (Fees!); 2009 SUNY Albany joins; 2012 Town of Guilderland leaves (Jan); returns (Oct); 2013 Village of Voorheesville leaves; 2014 Village of Altamont joins (newly regulated MS4); 2016 Village of Altamont leaves
- **Stormwater Coalition website:** www.stormwateralbanycounty.org

44

Why care?

Earth Water Supply

97% salt
2.4% glaciers/ice caps
~.6% unavailable
~003% potable and drinkable

45