

Stormwater Coalition of Albany County

**Town of Bethlehem
New York**

MS4 Permit No. NYR20A464

**Annual Evaluation
(April, 2020)**

**Storm Water Management Program Plan
(BMPs and Measurable Goals)
2020 to 2021**

A. History of Coalition SWMP Plan Document

The current MS4 Permit (NYSDEC MS4 Permit No. GP-0-15-003) allows regulated entities to collaborate when creating and updating their Stormwater Management Program (SWMP) and Stormwater Management Program Plan (SWMP Plan). For details, see Appendix A MS4 Permit No. GP-0-15-003 Excerpts: Collaboration, SWMP Plan, and Annual Report Requirements.

To that end and dating back to when the Stormwater Coalition of Albany County was formed in 2009 (inter-municipal agreement) the public entities listed below have routinely prepared a Joint Stormwater Management Program document using 'CBI' *MS4Web* software. The document has historically been referred to as a *SWMP Plan*. It is a compilation of goals noting planned activities and whether or not the activity was completed.

However, according to the current MS4 Permit, the SWMP Plan in its entirety includes not only the annual tracking of progress meeting measurable goals, but also documents retained by each MS4/municipality verifying that the goals have been met. These include written procedures, outfall inspection data sheets, adopted local laws, procedures related to municipal operations, etc.

This past year as a consequence of software changes and maintenance costs, Coalition members decided to discontinue using 'CBI' *MS4Web*. Instead a spreadsheet tracking tool was created which merges the most functional content of the NYSDEC DRAFT MS4 Permit released in 2016 with high priority requirements of the current MS4 Permit. Together these requirements are assumed to be the Best Management Practices each MS4 should implement in order to reduce the discharge of pollutants from their small MS4 to the maximum extent practicable.

For the Stormwater Coalition, updating BMPs and program goals is a collaborative, annual effort. Typically strengths and weaknesses of individual programs are discussed, goals reviewed, often modified, and new goals created to help the MS4/municipality prioritize future activities. Coalition services are discussed as well and goals specific to the Coalition are evaluated, modified, and new goals created as needed. The role of the Coalition is to organize and facilitate these evaluations and prepare the final document for posting on the Coalition website.

The process itself is best described as an Annual Evaluation and for this reason, rather than refer to this document as a SWMP Plan, it is instead described as an Annual Evaluation, specifically that piece of the all-inclusive SWMP Plan which describes progress meeting measurable goals associated with particular Best Management Practices (BMPs).

B. Participating MS4s by Type and Coalition Participation

Below is a list of Coalition members who participated in the April 2020 Annual Evaluation. They are grouped by type of MS4 and an Annual Evaluation has been prepared for each Coalition MS4/municipality. There is also an annual evaluation for the Stormwater Coalition. While not a regulated MS4, the Stormwater Coalition is directly involved with permit implementation and goals pertaining to the Coalition are detailed in their annual evaluation. *Due to Covid-19 restrictions, where indicated the Annual Evaluation will be incorporated at a later date.

Traditional Non Land Use Control MS4 (County)	Traditional Land Use Control MS4s (Town, Village, City)	
1. Albany County (NYR20A359)	3. City of Albany (NYR20A464)	8. Town of Guilderland (NYR20A211)
Non-Traditional MS4 (Public University)	4. Town of Bethlehem (NYR20A208)	9. Village of Menands (NYR20A144)*
2. University at Albany-SUNY (NYR20A234)	5. City of Cohoes (NYR20A243)	10. Town of New Scotland (NYR20A463)
	6. Town of Colonie (NYR20A190)	11. Village of Voorheesville (NYR20A210)
	7. Village of Green Island (NYR20A377)	12. City of Watervliet (NYR20A087)
Not an MS4 (no MS4 Permit No)		
Inter-municipal Agreement-Memorandum of Understanding for group of MS4s (Basic Services pertaining to MS4 Permit)		
13. Stormwater Coalition of Albany County		

C. Annual Evaluation (Individual MS4)

Bethlehem_T		MS4 Permit No: NYR20A208		DATA from AR2019 (3/2018 to 3/2019) and Other Sources											
MCM3		MCM 4				MCM5				MCM6					
# Map'd OF	563	# SWPPP Reviewed	14	Of active sites, # inspected once during reporting year	100% (30 active sites)	# of Enforcement Actions - By Type				# of PCSMPs in Inventory	Total: 130 (13 Alternative, 41 Filter, 10 Infiltration Basins, 11 Open Channels, 32 Ponds, 1 Wetland, 10 Other)		Total # Muni Owned Facilities		
% Map'd	97	# Constr Pmt Authorized	Total: 7	Of active sites, # inspected more than once during reporting year	100% (30 active sites)	Verbal and/or email warning				Private:	MS4 Owned:	# Muni Facility - To Assess - Tri Annual			
# ORIs	126	Private:		MS4 inspection procedures: frequency of CGP inspections?		Notice of Violation	37	# PCSMPs Inspected in Report'g Yr (By Whom?)	Total: 62 (13 Alternative, 12 Filter, 1 Infiltration Basin, 7 Open Channels, 20 Ponds, 9 Other)	# of Muni Facilities - Assessed- Report'g Yr					
# IDDE Detected	8	MS4 owned:		actual frequency (met? not met?)		Stop Work Order		Private:	MS4 Owned:	Catch Basins	Total #				
# IDDE Confirmed	7	issues?				Court Action (Fines, Penalties)	7 Administrative Fines	Inspection issues?		Inspected	18				
# IDDE Eliminated	7	# Constr Pmt Active	Total: 30	# of construction site enforcement actions by MS4?	48	Withhold building permits, C of O		# PCSMPs Maintained in Report'g Yr (By Whom?)	Total: 8 (1 Filter System, 3 Open Channels, 1 pond, 3 Other)	Cleaned, if necessary	18				
# IDDE Enforcement Type		Private:		by whom?		Contract Terminated		Private:	MS4 Owned:	Sweeping	Lots: # acres	6			
		MS4 owned:				Other	4	Maintenance issues?		Streets:# Miles	110				
Bethlehem_T		MS4 Permit No: NYR20A208		Name(s) of SWMP Preparer(s): Joe Cleveland and Nancy Heinzen				Evaluation Date: April 8, 2020				Other:			
Coalition SWMP April, 2019 Annual Eval Document										Coalition SWMP April, 2020 Annual Evaluation					
The Coalition April 2019 SWMP document was created using the 'CB' MS4Web SWMP module. BMPs and Measurable Goals from that document are described here. The Coalition stopped using the CB MS4Web software in 2020. This spreadsheet tracking of MS4 Permit requirements (BMPs), Measurable Goals, and documentation of progress meeting Measurable Goals replaces the April 2019 Annual Evaluation SWMP document.										This spreadsheet tracking of MS4 Permit requirements (BMPs) and documentation of progress meeting Measurable Goals replaces the April, 2019 'CB' MS4Web SWMP Module format.					
2019 SWMP Document	BMPs = 2016 DRAFT MS4 Permit Requirements				2019/2020 Measurable Goals = MS4Web 'Activities'		Progress Meeting Goals		BMPs = MS4 Permit Requirements (DRAFT 2016 or GP-0-15-003 end April, 2017)						
Key	Table of Contents from Draft MS4 Permit		Appendix A SWMP Recording Requirements		Appendix C Compliance Schedule		Individual MS4 - Priority Activities for 2019/2020		Status Past Goals		New Measurable Goals			Responsible Parties	
MS4Webs: BMP Detail MCM [Text: No.]	Part Title.	Permit Section No.	Required Record	Deliverable	Town of Bethlehem	2019/2020 Activity- Measurable Goal Met?	Comments	BMP Category	Goal	Due Date	MS4	Coalition			
No. 1	Part I. Permit Coverage and Limitations	Part I.B.1.	Administrative Requirements: All documentation necessary to demonstrate Eligibility												
No. 2	Part II. Obtaining Permit Coverage	Part II.A	Administrative Requirements: Notice of Intent	Submit NOI to Continue Coverage (30 days)											
No. 3	Part IV. Stormwater Management Program Requirements	Part IV.A.2	Administrative Requirements: Compliance Schedule and related reports												
No. 4	Part IV. Stormwater Management Program Requirements	Part IV. B.1	Administrative Requirements: SWMP Coordinator	Designate a SWMP Coordinator (30 days)											
				SWMP Coordinator receives 4 hours stormwater management training of Department endorsed training in stormwater management and the requirements of this permit (1year)											
No. 5	Part IV. Stormwater Management Program Requirements	Part IV.B.2	Administrative Requirements: Inter-municipal agreements and other legal authorities	Update agreements with 3rd party contractors, coalitions or other entities where resources are shared (1 year)	1. Maintain representation on the Coalition Board of Directors; decide budget (staffing, operation expenses), pay dues, attend Working Group meetings; implement Coalition work plan, implement grant work plan, support Albany County as Lead Applicant of NYSDEC WQIP program grant.	Goal Met	Paid dues; supported grant, maintained representation (Working Group and Board)	Administrative	Maintain representation on the Coalition Board of Directors; decide budget (staffing, operation expenses), pay dues, attend Working Group meetings; implement Coalition work plan. Not AR measurable goal	3/9/2021	X	X			

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												No Goal. Other Activity: Shared services agreement with Town of New Scotland includes highway equipment used to implement stormwater requirements													
												No Goal. Other Activity: Amended Coalition IMA to include dedicated stormwater staffing for 4 MS4s (2020)													
No. 6				Part. IV.B.3		Administrative Requirements: Staffing and staff development programs and organization charts		Develop staffing plan/organizational chart (6 months)		1. Complete organizational chart		Goal Met		Completed 9/2019, updated 2/4/2020		Administrative		Update org. chart as needed Not AR measurable goal		3/9/2021		X			
No. 7		Part IV. Stormwater Management Program Requirements		Part IV.F		Administrative Requirements: Enforcement Response Plan & Documentation of cases		Develop system to track enforcement (1 year)		1. Continue to develop a comprehensive Enforcement Response Plan as described in DRAFT MS4 Permit, revised as needed depending on final MS4 Permit. Meet with relevant Town staff to explain and develop plan.		Goal Met		Completed 9/2019, includes preliminary Enforcement Response Plan, met with Stormwater Management Officer (SMO) to create procedures and policies		Administrative									
								Develop Enforcement Response Plan (3 years)																	
No. 8		Part V. Program Evaluation, Recordkeeping, Reporting and Certification		Part V.A.		Administrative Requirements: Annual Evaluation										Administrative		Complete Annual Evaluation as part of SWMP Update (April, 2020) Not AR measurable goal		3/9/2021		X		X	
No. 9		Part V. Program Evaluation, Recordkeeping, Reporting and Certification		Part V.C.2		Administrative Requirements: Annual Reports										Administrative		Submit Annual Report by June 1, 2020 Not AR Measurable goal		6/1/2020		X		X	
No. 10				No Part No listed		Administrative Requirements: MS4 Correspondence with the Dept																			
Special Conditions							Special Conditions																		
No. 11		Part III. Special Conditions		Part III.A.3		Special Conditions: Corrective actions implemented to correct a violation of Water Quality Standards																			

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Mapping							Mapping							
No. 12	Part IV. Stormwater Management Program Requirements	Part IV.C.	Mapping: Map of the MS4 conveyance system	Update map to show location of the entire small MS4 system (i.e. catch basins type of conveyance, outfalls); surface waters; impaired waters; areas of concern; post construction SMPs; municipal facilities; location of confirmed or suspected illicit discharges. (5 years or 8 years in phases from 2019 DEC powerpoint)	1. Continue ongoing storm system mapping throughout the Town. Prioritized area of interest: "Old Delmar". Prioritized mapping task: locating storm system infrastructure and mapping it's connectivity to stormwater outfalls	Goal Met	Conducted recon mapping and ORIs in Old Delmar and elsewhere in Town, collected mapping data to import to Stormwater GIS datasets, made updates to Storm System Mapping GIS data	Mapping	MCM3 1. Continue ongoing Storm System Mapping (SSM) data collection and integration into SSM GIS datasets when possible	3/9/2021	X			
					2. Map the location of suspected, confirmed, and eliminated illicit discharges	Goal Unmet	Unable to complete due to time constraints, other GIS priorities	Mapping	MCM3 2. Map IDDEs by creating dataset in Town of Bethlehem Stormwater GIS	3/9/2021	X			
					3. Post Town of Bethlehem storm system map layers on the Coalition SwIM mapper	Goal Met	Cut of Storm System Mapping data provided to Coalition April, 2019							
					4. Map new outfalls, as needed	Goal Met	Completed reconciliation of Outfall Inventory in Town GI due to updated Storm System Mapping and Town's EPA MS4 Program Audit in 9/2020	Mapping (MCM 3 IDDE current MS4 Permit)	MCM3 3. Continue to map new outfalls as they become active or are discovered	3/9/2021	X			
					5. Map post construction sw practices and municipal facilities as needed	Goal Met	Completed. Updated PCSMP GIS inventory and Facilities GIS inventory	Mapping						
					6. Delineate storm sewershed boundaries (top of sw conveyance system to outfall).	Goal Unmet	Unable to complete due to time constraints, other GIS priorities.							
MCM 1 - Public Education and Outreach							MCM 1 - Public Education and Outreach							
No. 13	Part VI. Minimum Control Measures (MCMs) A. MCM 1-Public Education and Outreach		MCM1 Public Education and Outreach: Pollutant of Concern, Geographic Areas of Concern and waterbodies of concern	Program Development and Implementation (1 year) .			No Goal. Other Activity: Mapped Pollutants of Concern Provided by SW Coalition, Updated Town Geographic Areas of Concern and Waterbodies of Concern 9/2020							
No. 14	Part VI. Minimum Control Measures (MCMs) A. MCM 1-Public Education and Outreach	Part VI.A.1.	MCM1 Public Education and Outreach: Defined goals of the Educational program	Develop and implement program to educated public about significant stormwater issues that are relevant to the MS4. See Part VI.A.1 for guidelines	1. Distribute stormwater literature at two Household Hazardous Waste Collection Days.	Goal Met	Distributed over 1,000 SW brochures (Over 500 per event).	MCM 1 Public Education	1. Continue to distribute stormwater literature at two Household Hazardous Waste Collection Days, if organized (COVID19 dependent).	3/9/2021	X			
					2. Distribute Moving Dirt and Pool Brochure to individuals seeking a building permit; monitor amount distributed.	Goal Met	Ditributed 128 Moving Dirt and 41 Pool brochures	MCM 1 Public Education	2. Continue to distribute Moving Dirt and Pool Brochure to individuals seeking a building permit.	3/9/2021	X			
					3. Meet with Town staff to decide future of rain garden, in particular relocation options, time frame, tasks, and feasibility.	Goal Unmet	Dropped - Demonstration Rain Garden was not an MS4 permit requirement, dropped due to scheduling issues, prioritization of other tasks							

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MCM 2 - Public Participation						MCM 2 - Public Participation							
No. 15	Part VI. Minimum Control Measures (MCMs) B. MCM 2- Public Participation	Part VI.B.1	MCM 2 Public Participation: Opportunities provided to the public for participation in the program	Identify at least one opportunity for public participation on development and implementation of SWMP. See Part VI.B.1. for types of opportunities. (6 months)	1. Continue to support Community Clean Up Days.	Goal Met	Two community cleanup events were conducted in Town	MCM 2 Public Participation	1. Continue to support Community Clean Up Days.	3/9/2021	X		
				Inform public of the opportunities (ex. update website, publish in newsletter, announcement, advertisements). (6 months)	2. Continue to support Coalition outreach to recruit volunteer stream monitors (WAVE)	Goal Met	Coalition conducted 4 WAVE stream monitoring events, 2 of which were held within Town of Bethlehem, Vlooman Kill and Onesquethaw/Coeymans Creek	MCM 2 Public Participation	2. Continue to support Coalition outreach to recruit volunteer stream monitors (WAVE), contingent on COVID 19 restrictions	3/9/2021	X		
				Identify local Point of Contact to receive and respond to public concerns regarding stormwater management. or compliance. See Part VI.B.1.c. Name or title of this contact and telephone number must be published in public outreach and public participation materials. (6 months)									
					3. Continue to support and track street tree plantings	Goal Met	Three street trees were planted.	MCM 2 Public Participation	3. Continue to support and track street tree plantings				
No. 16	Part VI. Minimum Control Measures (MCMs) B. MCM 2- Public Participation	Part VI.B.2	MCM 2 Public Participation: Public input comments received on SWMP and annual report		Continue to post the DRAFT/FINAL Annual Report on a website for public comment and post the location of the SWMP as required by the MS4 Permit. The Coalition role and Annual Report requirements may change depending on the release of the updated MS4 Permit and other considerations.	Goal Met was not 2019 AR MG, only in MS4Web	Both posted on Town SW Website and SW Coalition website.	MCM 2 Public Participation					
					4. Continue to support the Annual Report public comment process and posting of FINAL Annual Report.	Goal Met	No public comments received, FINAL Annual Report posted on Town website	MCM 2 Public Participation	4. Continue to support the Annual Report public comment process and posting of FINAL Annual Report.	3/9/2021	X	X	

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MCM 3 - Illicit Discharge Detection and Elimination Part VI. C (towns, villages, cities) and Part VII.C (County, public universities)							MCM 3 - Illicit Discharge Detection and Elimination Part VI. C (towns, villages, cities) and Part VII.C (County, public universities)						
No. 17	Part VI. Minimum Control Measures (MCMs) C. MCM 3 - Illicit Discharge Detection & Elimination	Part VI.C.1.a	MCM3 Illicit Discharge Detection & Elimination: Law, ordinance or regulatory mechanism				IDDE Local Law adopted (current MS4 Permit)	MCM 3 IDDE					
No. 18	Part VI. Minimum Control Measures (MCMs) C. MCM 3 - Illicit Discharge Detection & Elimination	Part VI.C.1.b	MCM3 Illicit Discharge Detection & Elimination: Certification of equivalency by attorney representing MS4				Equivalency of local law certified by municipal attorney (current MS4 Permit)	MCM 3 IDDE					
No. 19	Part VI. Minimum Control Measures (MCMs) C. MCM 3 - Illicit Discharge Detection & Elimination	Part VI.C.2	MCM3 Illicit Discharge Detection & Elimination: Education materials on Illicit Discharge prevention program	Update education and outreach to address most common behaviors identified through implementation of program (1 year)				MCM 3 IDDE; MCM 1 Public Education	MCM1 3. Insert stormwater message in at least one water & sewer bills specifically targeting illegal dumping into the MS4	3/9/2021	X		
No. 20	Part VI. Minimum Control Measures (MCMs) C. MCM 3 - Illicit Discharge Detection & Elimination	Part VI.C.3	MCM3 Illicit Discharge Detection & Elimination: Hotline reports including name, date of report, location	Establish a hotline & system to track complaints on illicit discharges (6 months)		Goal Met		MCM 3 IDDE	MCM3 4. Continue to support the Track A Concern program and monitor/respond to public questions, complaints, other issues of concern.	3/9/2021	X		
						Goal Met	Town Stormwater website was updated to highlight water quality issues associated with stormwater pollution						
No. 21	Part VI. Minimum Control Measures (MCMs) C. MCM 3 - Illicit Discharge Detection & Elimination	Part VI.C.4.a	MCM3 Illicit Discharge Detection & Elimination: Priority areas based on IDDE Guidance	Part VI.C.4 Identify areas with high discharge potential using Table 14 of IDDE Guidance Manual (6 months)									
				Part VI.C.4 Identify High Priority Outfalls (3 years)									
No. 22	Part VI. Minimum Control Measures (MCMs) C. MCM 3 - Illicit Discharge Detection & Elimination	Part VI.C.4.b	MCM3 Illicit Discharge Detection & Elimination: ORI Field Sheets	Part VI. C.4 Develop outfall inspection procedures (identify individuals responsible for inspections, procedures for recording information as part of outfall inspections, procedures for sampling flowing outfalls, re-inspection of outfalls) (3 years)	1. Complete ORI's for 20% of outfalls (~20% of 466, most current count of mapped outfalls) will prioritize newly mapped outfalls.	Goal Met	Goal met - 167 ORIs completed	MCM 3 IDDE	MCM3 5. Conduct annual ORIs for 20% of MS4 Outfall inventor	3/9/2021	X		
				Part VI.C.4 Train individual(s) assigned to outfall inspections and sampling (1.5 years)			This training occurs annually.	MCM 3 IDDE, MCM6 Municipal Operations/Good Housekeeping (staff training)					

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No. 23	Part VI. Minimum Control Measures (MCMs) C. MCM 3 - Illicit Discharge Detection & Elimination	Part VI.C.4.b.iv	MCM3 Illicit Discharge Detection & Elimination: Outfall Sampling Results	Part VI.C.4 Develop system for tracking outfall inspections and analyzing data (1.5 years)			Outfall inspection procedures completed (current MS4 Permit)	MCM 3 IDDE					
No. 24	Part VI. Minimum Control Measures (MCMs) C. MCM 3 - Illicit Discharge Detection & Elimination	Part VI.C.5	MCM3 Illicit Discharge Detection & Elimination: Track Down procedures	Part VI.C.3. Develop track down procedures (identifying individuals responsible for track down, procedures to meet Chapter 13 of IDDE Guidance, time frames to act, referral for elimination) (2 years)			Illicit discharge track down procedures completed (current MS4 Permit)	MCM 3 IDDE					
				Part VI.C.4. Train individual(s) assigned to track down illicit discharges (1 year)									
No. 25	Part VI. Minimum Control Measures (MCMs) C. MCM 3 - Illicit Discharge Detection & Elimination	Part VI.C.6	MCM3 Illicit Discharge Detection & Elimination: Illicit Discharge Elimination procedures	Part VI.C.6 Update procedures for elimination (identifying individuals responsible for contacting responsible party, time frames to act, escalating enforcement, confirm corrective action, tracking progress) (2 years)			Illicit discharge elimination procedures completed (current MS4 Permit)	MCM 3 IDDE					
MCM 4 - Construction Site Runoff Control							MCM 4 - Construction Site Runoff Control						
No. 26	Part VI. Minimum Control Measures (MCMs) D. MCM 4 - Construction Site Runoff Control	Part VI.D.3.a	MCM 4 Construction Site Runoff Control: Law, ordinance or regulatory mechanism	Part VI.D.3 Update the local law and certify that it is equivalent to the new model law (1.5 years)			Stormwater Management Local Law adopted (current MS4 Permit)	MCM 4 Construction Site Runoff Control					
No. 27	Part VI. Minimum Control Measures (MCMs) D. MCM 4 - Construction Site Runoff Control	Part VI.D.3.b	MCM 4 Construction Site Runoff Control: Certification of equivalency by attorney representing MS4				Equivalency of Stormwater Management Local Law certified by municipal attorney (current MS4 Permit)	MCM 4 Construction Site Runoff Control					
No. 28	Part VI. Minimum Control Measures (MCMs) D. MCM 4 - Construction Site Runoff Control	Part VI.D.4	MCM 4 Construction Site Runoff Control: Education materials on Construction program										
No. 29	Part VI. Minimum Control Measures (MCMs) D. MCM 4 - Construction Site Runoff Control	Part VI.D.5	MCM 4 Construction Site Runoff Control: Construction Site Inventory	Part VI.D.5 Update construction site inventory to track new data elements (i.e. elements not explicitly required by GP-0-15-003) (3 years)			No Goal. Construction site inventory is routinely updated and incorporated into GIS	MCM 4 Construction Site Runoff Control	1. Update Construction Site Inventory in Town GIS and track important permit elements	3/9/2021	X		
No. 30	Part VI. Minimum Control Measures (MCMs) D. MCM 4 - Construction Site Runoff Control	Part VI.D.6	MCM 4 Construction Site Runoff Control: Construction Site priority areas		Continue to conduct formal, routine inspections of all active construction sites	Goal Met	Goal met - all active construction sites were inspected frequently	MCM 4 Construction Site Runoff Control	2. Conduct construction site SWPPP compliance inspections for all active construction sites multiple times throughout the reporting year	3/9/2021	X		
No. 31	Part VI. Minimum Control Measures (MCMs) D. MCM 4 - Construction Site Runoff Control	Part VI.D.7 & VI.E.4	MCM 4 Construction Site Runoff Control: SWPPP Review forms	Part VI.D.7 Update SWPPP review procedures (utilize form for new projects) for erosion sediment control and post construction review (1 year)		1. Continue to update SWPPP Review procedures	SWPPP Review procedures and SWPPP review flowchart updated, 8/2019 (current MS4 Permit)						

Bethlehem_T		MS4 Permit No: NYR20A208		Name(s) of SWMP Preparer(s): Joe Cleveland and Nancy Heinzen			Evaluation Date: April 8, 2020				Other:		
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				Part VI.D.7 Train SWPPP reviewers (1.5 years)				MCM 4 Construction Site Runoff Control, MCM6 Muni Ops/Good Housekeep'g (staff training)	3. Ensure SWPPP reviewers have adequate stormwater training	3/9/2021	X		
No. 32	Part VI. Minimum Control Measures (MCMs) D. MCM 4 - Construction Site Runoff Control	Part VI.D.8	MCM 4 Construction Site Runoff Control: Documentation of all Pre-Construction Inspection meetings	Part VI.D.8. Establish procedures for pre-construction inspection/meeting (6 months)			No Goal. Other Activity: Pre-construction meeting documents and procedures were updated, 8/2019.	MCM 4 Construction Site Runoff Control	4. Continue to conduct pre-construction meetings for all SPDES permitted Construction Activities	3/9/2021	X		
No. 33	Part VI. Minimum Control Measures (MCMs) D. MCM 4 - Construction Site Runoff Control	Part VI.D.9 & VI.D.10	MCM 4 Construction Site Runoff Control: Construction Site Inspection documentation including project closeout inspection	Part VI.D.9 Update construction inspection procedures (identify individual(s) responsible for inspections, inspection frequencies, documentation, close out, sign NOT) (1 year)		Goal Met	Significant progress achieved in identifying private PCSMPs without required signage. Follow-up was conducted with owners regarding maintenance records.	MCM 4 Construction Site Runoff Control					
				Part VI.D.7 Train Construction site inspectors (1.5 years)									
				Part VI.D.7 Train individuals in four (4) hours of Department endorsed training in proper erosion and sediment control principles from a Soil and Water Conservation District or other endorsed entity (1.5 years)									
				Part VI.D.11 Update tracking system for inspections and complaints (6 months)									
No. 34	Part VI. Minimum Control Measures (MCMs) D. MCM 4 - Construction Site Runoff Control	Part VI.D.10	MCM 4 Construction Site Runoff Control: Public complaint reports including name, date of report, location...				Complaints related to construction sites are routinely tracked, follow up is immediate						

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MCM 5 - Post Construction Stormwater Runoff							MCM 5 - Post Construction Stormwater Runoff					
No. 35	Part VI. Minimum Control Measures (MCMs) E. MCM 5 - Post Construction Stormwater Management	Part VI.E.2.a	MCM 5 Post Construction Stormwater Runoff: Law, ordinance or regulatory mechanism	Part VI.E.2 Update the local law and certify that it is equivalent to the new model law (1.5 years)			Stormwater Management Local Law adopted (current MS4 Permit)					
No. 36	Part VI. Minimum Control Measures (MCMs) E. MCM 5 - Post Construction Stormwater Management	Part VI.E.2.b	MCM 5 Post Construction Stormwater Runoff: Certification of equivalency by attorney representing MS4				Equivalency of Stormwater Management Local Law certified by municipal attorney (current MS4 Permit)					
No. 37	Part VI. Minimum Control Measures (MCMs) E. MCM 5 - Post Construction Stormwater Management	Part VI.E.3	MCM 5 Post Construction Stormwater Runoff: Post-Construction SMP Inventory	Part VI.E.3 Update Post Construction SMP inventory to track all required elements (identify frequency for inspection based on the O&M manual or DEC design manual) (3 years)				MCM 5 Post Construction Stormwater Runoff	1. Update Post Construction SMP inventory to track status of operation and maintenance of SMPs as responsibilities change from approval to completion of project and then for ongoing maintenance	3/9/2021	X	
No. 38	Part VI. Minimum Control Measures (MCMs) E. MCM 5 - Post Construction Stormwater Management	Part VI.E.5	MCM 5 Post Construction Stormwater Runoff: Post-Construction Inspection documentation	Part VI.E.5 Train individuals responsible for inspection and maintenance (1.5 years)	1. Inspect all Town owned post-construction sw practices.	Goal Met	All town owned PCSMPs were inspected.	MCM 5 Post Construction Stormwater Runoff	2. Inspect all Town-owned PCSMPs annually	3/9/2021	X	
					2. Contact owners of non Town owned post construction sw practices for info about certifications and maintenance documentation (prioritize owners who did not respond previously).	Goal Met	Completed. All owners of privately-owned PCSMPs were sent letter in 9/2019 requesting required operations & maintenance documentation.	MCM 5 Post Construction Stormwater Runoff	3. Continue to request and retain required Operations & Maintenance inspection and maintenance documentation annually from Private PCSMP owners	3/9/2021	X	
MCM 6 - Municipal Operations/Good Housekeeping							MCM 6 - Municipal Operations/Good Housekeeping					
No. 39	Part VI. Minimum Control Measures (MCMs) F. MCM 6 - Pollution Prevention & Good Housekeeping	Part VI.F.1 & VI.F.4.c	MCM 6 Municipal Operations/Good Housekeeping: Written procedures/protocols or Facility Specific SWPPP for High Priority Facilities	Part VI.F.3 Develop facility specific SWPPPs for high priority facilities (3 years)								
No. 40	Part VI. Minimum Control Measures (MCMs) F. MCM 6 - Pollution Prevention & Good Housekeeping	Part VI.F.2.q	MCM 6 Municipal Operations/Good Housekeeping: Compliance documentation	Part VI.F. Assess all municipal facilities and operations for compliance with new requirements on current schedule (3 years)	Conduct MS4 facility self audits on a rotating schedule as needed based on last inspection date	Goal Met	14 MS4 facilities received MS4 facility self audits	MCM6 Municipal Operations/Good Housekeeping	1. Conduct assessment of all municipal facilities within the MS4 regulated area which have not been assessed since March 2017.	3/9/2021	X	
				Part VI.F.2 Update employee training program on proper procedures, specific control measures and documentation requirements (1.5 years)	Train 100% of relevant Town staff by use of stormwater training DVDs, 4-hour erosion & sediment control training sessions, or other relevant trainings as available and applicable	Goal Met	100 percent of relevant Town staff received at least 1 stormwater training	MCM6 Municipal Operations/Good Housekeeping	2. Ensure all relevant staff receive at least one annual stormwater training.	3/9/2021	X	
								MCM6 Municipal Operations/Good Housekeeping	3. Communicate training opportunities to relevant Town staff (email/other)	3/9/2021	X	

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No. 41	Part VI. Minimum Control Measures (MCMs) F. MCM 6 - Pollution Prevention & Good Housekeeping	Part VI.F.3.a.	MCM 6 Municipal Operations/Good Housekeeping: Catch basin inspection and clean out plan	Part VI.F.4 Develop procedures for catch basin inspection/maintenance (identify priority areas, establish frequency, log, disposal practices, evaluation of results) (2 years)									
				Part VI.F.4 Train individuals responsible for catch basin clean out (1 years)									
				Part VI.F.4 Conduct initial inspection of all catch basins and clean out (3 years)									
No. 42	Part VI. Minimum Control Measures (MCMs) F. MCM 6 - Pollution Prevention & Good Housekeeping	Part VI.F.3.b.i.	MCM 6 Municipal Operations/Good Housekeeping: Procedures for Street Sweeping/Cleaning	Part VI.F.4 Update street/road maintenance procedures (sweep at required intervals, update BMPs for roadway maintenance, winter maintenance and bridge maintenance) (2 years)									
No. 43	Part VI. Minimum Control Measures (MCMs) F. MCM 6 - Pollution Prevention & Good Housekeeping	Part VI.F.3.b.iv.	MCM 6 Municipal Operations/Good Housekeeping: Procedures for Bridge Maintenance and Repair										
No. 44	Part VI. Minimum Control Measures (MCMs) F. MCM 6 - Pollution Prevention & Good Housekeeping	Part VI.F.3.c	MCM 6 Municipal Operations/Good Housekeeping: Procedures to ensure Compliance with Construction General Permit	Part VI.F.4 Update procedures to inspect and maintain post construction SMPs (identify individuals, utilize inspection form, conduct follow up inspections, referral to higher level inspection) (2 years)									
No. 45	Part VI. Minimum Control Measures (MCMs) F. MCM 6 - Pollution Prevention & Good Housekeeping	Part VI.F.4.a	MCM 6 Municipal Operations/Good Housekeeping: Prioritized Inventory of municipal facilities	Part VI..F.3 Develop inventory of municipal facilities (1 year)				MCM6 Municipal Operations/Good Housekeeping	4. Continue to update GIS inventory of municipal facilities with relevant data	3/9/2021	X		
No. 46	Part VI. Minimum Control Measures (MCMs) F. MCM 6 - Pollution Prevention & Good Housekeeping	Part VI.F.4.e	MCM 6 Municipal Operations/Good Housekeeping: High Priority facility assessments including Quarterly Visual monitoring and follow up actions										
No. 47	Part VI. Minimum Control Measures (MCMs) F. MCM 6 - Pollution Prevention & Good Housekeeping	Part VI.F.5	MCM 6 Municipal Operations/Good Housekeeping: Municipal facilities with stormwater discharges associated with Industrial activity	Part VI..F.3 Develop facility specific SWPPPs for facilities not covered by MSGP or No Exposure (3 years)									
No. 48	Part VI. Minimum Control Measures (MCMs) F. MCM 6 - Pollution Prevention & Good Housekeeping	Part VI.F.6	MCM 6 Municipal Operations/Good Housekeeping: BMPs and procedures/protocols for low priority facilities	Part VI.F.3 Develop and implement facility assessments (2 years)	1. Communicate training opportunities to Town staff (email/other)	Goal Met	Provided notices of upcoming trainings to Building, Planning, Highway, and Engineering staff routinely throughout the year.	MCM6 Municipal Operations/Good Housekeeping					

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				Part VI..F.3 Develop procedures for Low Priority Facilities (identify individual(s) responsible, identify activities occurring, identify applicable BMPs for activities conducted, assessment) (1 years)	2. Implement standardized stormwater training for new hires. Include with other new hire training requirements.	Goal Met	New staff with roles within the MS4 Organizational chart were provided relevant stormwater training.	MCM6 Municipal Operations/Good Housekeeping				
					3. Review master list of all Town owned properties, confirm/drop which to include in tri-annual facility self audit. Consider location (in/out urbanized area; proximity to water bodies; water quality risks).	Goal Met	Reconciled and updated inventory of auditable municipal facilities.	MCM6 Municipal Operations/Good Housekeeping				
					4. Consider options for maximizing internal coordination of MS4 Permit requirements.	Goal Met	Updated Organizational chart to identify all relevant parties and to establish a clear chain of command for different aspects of the Town's MS4 permit requirements	MCM6 Municipal Operations/Good Housekeeping				
Enhanced Requirements for impaired Waters without and Approved TMDL - Pollutant Specific BMPs for Phosphorus (Ann Lee Shakers Pond)						Enhanced Requirements for impaired Waters without and Approved TMDL - Pollutant Specific BMPs for Phosphorus (Ann Lee Shakers Pond)						
			Not itemized in Appendix A	Part VIII.A.5 & Part VII.C.5 MCM 6-Provide procedures for repair of outfall protection and bank stability to ensure repairs are completed within 30 days of discovery (1 year)			NA					
				Part VIII.A.4 MCM 4: Prioritize construction sites as High Priority in sewersheds discharging to impaired waters (1 year)								
				Part VIII..A.1 MCM 1: Provide additional timely educational messages to specific audiences; add supplemental education for commercial users (2 years)								
				Part VIII..A.2 Mapping: Update map to show impaired waters/system components; areas generating POCs (i.e. hotspots); location of SMP inventory and prioritized municipal facilities (2 years)								
				Part VIII..A.5 MCM 6: Provide street sweeping monthly in sewersheds to impaired segments (2 years)								
				Part VIII.A.3 MCM 3: Prioritize outfalls to impaired waters as High Priority and perform inspections in accordance with Schedule in Part VI.C.4 or Part VI.C.4 (whichever is applicable) (3 years)								
				Part VIII.A.3. Provide additional illicit discharge inspections in Pollutant of Concern potential generating sites (3 years)								

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				Part VIII.A.5. Provide additional time-of-year inspections of catch basins (3 years)									
				Part VIII.A.5. Provide additional time-of-year inspections of catch basins (3 years)									



NEW YORK STATE
DEPARTMENT OF ENVIRONMENTAL CONSERVATION
SPDES GENERAL PERMIT
FOR STORMWATER DISCHARGES

From

MUNICIPAL SEPARATE STORM SEWER SYSTEMS (MS4s)

Permit No. GP-0-15-003

Issued Pursuant to Article 17, Titles 7, 8 and Article 70
of the Environmental Conservation Law

Effective Date: May 1, 2015

Expiration Date: April 30, 2017

Modification Dates

July 15, 2015 - Correction of Table IX.C and Appendix 2 to reflect GP-0-10-002 October 2011 Modification

January 13, 2016 - Additional reporting for covered entities in the watersheds listed in Part IX

Stu Fox
Deputy Chief Permit Administrator


Authorized Signature

1/12/16
Date

Address: NYS DEC
Division of Environmental Permits
625 Broadway, 4th Floor
Albany, N.Y. 12233-17

**NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
 SPDES GENERAL PERMIT FOR DISCHARGES FROM
SMALL MUNICIPAL SEPARATE STORM SEWER SYSTEMS (MS4s)**

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(Part III.B.3.)

Within three years of having modified its SWMP to ensure that reduction of the POC specified in the TMDL is achieved, covered entities in future TMDL areas must assess their progress and evaluate their SWMP to determine the MS4's effectiveness in reducing their discharges of TMDL POC(s) to TMDL water bodies. This assessment shall be conducted for the portions of the small MS4 storm sewer shed that are within the TMDL watershed. The assessment shall be done using Department supported modeling of pollutant loading from the storm sewer shed.

Part IV. Stormwater Management Program (SWMP) Requirements

A. SWMP Background

Covered entities must develop (for newly authorized MS4s, implement), and enforce a SWMP designed to reduce the discharge of pollutants from small MS4s to the maximum extent practicable ("MEP") in order to protect water quality and to satisfy the appropriate water quality requirements of the ECL and the CWA. The objective of the permit is for MS4s to assure achievement of the applicable water quality standards. Covered entities under GP-0-10-002 must have prepared a SWMP plan documenting modifications to their SWMP. See Part X.B. (Definitions) for more information about the SWMP and SWMP plan.

The SWMP and SWMP plan may be created by an individual covered entity, by a shared effort through a group or coalition of individual covered entities, or by a third party entity. The SWMP plan shall be made readily available to covered entity's staff, to the public and to Department and EPA staff.

B. Cooperation Between Covered Entities Encouraged

The Department encourages covered entities to cooperate when developing and implementing their SWMP². However, each covered entity is responsible for obtaining its own permit coverage and for filing its own NOI. Irrespective of any agreements between covered entities, each individual covered entity remains legally responsible for satisfying all GP-0-15-003 requirements and for its own discharges. If one covered entity is relying on another covered entity to satisfy one or more of its permit obligations, that fact must be noted on the covered entity's MOC form. The other entity must, in fact,

² For example, villages are encouraged to cooperate with towns, towns with counties, and adjacent counties with each other. In addition, municipal governments are encouraged to coordinate and cooperate with non-traditional MS4s such as DOT, school and fire districts, Federal and State facilities located within and adjacent to their jurisdictions. Sewer boards, water boards, or other non-traditional entities are encouraged to partner with the municipality (municipalities) that they serve.

(Part IV.B.)

implement the MCM(s) and must agree to implement the MCM(s) on the first covered entity's behalf. This agreement between the two or more parties must be documented in writing and signed by both (all) parties. Part IV.G. below may apply if such an agreement is not already in place. The agreement must be included in the SWMP plan, and be retained by the covered entity for the duration of this SPDES general permit, including any administrative extensions of the permit term.

Covered entities that are working together to develop (for newly authorized MS4s) or implement their SWMPs are encouraged to complete shared annual reports. Covered entities may also hold a group meeting to present their annual reports to the public and to receive comments on their annual reports. These options are discussed in more detail in Part V.C.2.

C. Annual Reporting

1. Annual Report Submittal

The annual reporting period ends March 9 of each year. The annual report must be received in the Department's Central Office, electronic or hard copy, no later than June 1 of each reporting year. If electronic, submit in accordance with procedures set forth by the Department. If mailed, send to the address below:

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(Part V.C.1.)

NYS DEC "MS4 Coordinator"
Bureau of Water Permits
625 Broadway, 4th Floor
Albany, NY 12233-3505

Failure to submit a complete annual report and a complete MCC form (Part V.D) shall constitute a permit violation.

a. Annual Report Submittal for Newly Regulated Covered entities (Small MS4s not Previously Authorized by GP-0-10-002)

Newly regulated covered entities *developing* their SWMP are to submit their Annual Report in a format provided by the Department. They will provide, at a minimum, the information on the annual report form and the information required by Parts VII or VIII.

Newly regulated covered entities are required to submit their first annual report the year that authorization is granted if authorization is granted on or before December 31 of that reporting year.

b. Annual Report Submittal for Covered entities Authorized by GP-0-10-002 (Continuing Covered entities)

Beginning with annual reports due in 2010 covered entities implementing their SWMP shall submit, at a minimum, information specified by the Department in Part VII or VIII in a format provided by the Department.

2. Shared Annual Reporting and Submittal

Covered entities working together to develop (for newly authorized MS4s) and /or implement their SWMPs may complete a shared annual report. The shared annual report is an annual report that outlines and explains group activities, but also includes the tasks performed by individual covered entities (BMPs, measurable goals, schedules of planned activities, etc.). To facilitate the submission of one annual report for the entire group of covered entities, individual covered entity's activities may be incorporated into the report by either:

- providing the details specific to their *small MS4(s)* to a person(s) who incorporates that information into the group report. That one group report is submitted to the Department for all participating *small MS4s*; or
- providing the details specific to their *small MS4(s)* on a separate sheet(s) that will be attached with the one group report.

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(Part V.C.2.)

Regardless of the method chosen, each covered entity must, by June 1 of the annual reporting year:

- a. Provide their individual MCC form (see Part V.D) to be submitted with the shared annual report. Each covered entity must sign and submit an MCC form to take responsibility for all of the information in the annual report, which includes specific endorsement or acceptance of the shared annual report on behalf of the individual covered entity;
- b. Present their draft annual report at a meeting (see Part VII.A.2.d or Part VIII.A.2.d for more information). For completed shared annual reports, the report may be presented by each participating individual covered entity at an existing municipal meeting or may be made available for comments on the internet. Additionally, covered entities participating in shared annual reporting may combine meetings to have a group or regional meeting. While the group meeting is allowable, each covered entity shall ensure that local public officials and members of the public are informed about the program, activities and progress made; and
- c. Submit a summary of any comments received and (intended) responses on the individual covered entity's information or the shared annual report information, as applicable. This information should be included with the annual report submission. Changes made to the SWMP in response to comments should be described in the annual report.

3. Annual Report Content

The annual report shall summarize the activities performed throughout the reporting period (March 10 to March 9) and must include at a minimum:

- a. The status of compliance with permit conditions, including Watershed Improvement Strategy conditions;
- b. An assessment/evaluation of:
 - i. the appropriateness of the identified *BMPs*;
 - ii. progress towards achieving the statutory goal of reducing the *discharge of pollutants* to the *MEP*; and
 - iii. the identified *measurable goals* for each of the *MCMs*.
- c. Results of information collected and analyzed, monitoring data, and an assessment of the *small MS4's SWMP* progress toward the statutory goal of reducing the *discharge of pollutants* to the *MEP* during the reporting period. This could include results from required *SWMP* reporting, estimates of pollutant loading (from parameters such as identified illicit discharges, physically interconnected *small MS4s* that may contribute substantially to pollutant

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loadings from the *small MS4*) and pollutant load reductions (such as illicit discharges removed). This assessment may be submitted as an attachment;

- d. When required to be completed, results of assessments of effectiveness in meeting no net increase requirements or TMDL loadings as required by III. B.1 and 2. These results must be submitted in evaluation forms and as an attachment;
- e. A summary of the stormwater activities planned to be undertaken during the next reporting cycle (including an implementation schedule);
- f. Any change in identified *BMPs* or *measurable goals* and justification for those changes;
- g. Notice that a *small MS4* is relying on another entity to satisfy some or all of its permit obligations (if applicable);
- h. A summary of the public comments received on this annual report at the public presentation required in Part VII.A.2. or VIII.A.2. And, as appropriate, how the *small MS4* will respond to comments and modify the program in response to the comments;
- i. A statement that the final report and, beginning in 2009, the SWMP plan are available for public review and the location where they are available; and
- j. The information specified under the reporting requirements for each *MCM* (Part VII or VIII).

Part X. ACRONYMS AND DEFINITIONS

A. Acronym List

BMP - Best Management Practice
CFR - Code of Federal Regulations
CWA - Clean Water Act
ECL - Environmental Conservation Law
MCC - Municipal Compliance Certification
MCM - Minimum Control Measure
MEP - Maximum Extent Practicable
MS4 - Municipal Separate Storm Sewer System
NPDES - National Pollutant Discharge Elimination System
POC - Pollutant of Concern
SPDES - State Pollutant Discharge Elimination System
SWMP - Stormwater Management Program
SWMP Plan - Stormwater Management Program Plan
SWPPP - Stormwater Pollution Prevention Plan
TMDL - Total Maximum Daily Load
UA - Urbanized Area

B. Definitions

Activities - See best management practice

Additionally Designated Areas - EPA required the Department to develop a set of criteria for designating additional MS4 areas as subject to these regulations. The following criteria have been adopted to designate additional MS4s in New York State:

Criteria 1: MS4s discharging to waters for which and EPA-approved TMDL required reduction of a pollutant associated with stormwater beyond what can be achieved with existing programs (and the area is not already covered under automatic designation as UA).

Criteria 2: MS4s contiguous to automatically designated urbanized areas (town lines) that discharge to sensitive waters classified as AA Special (fresh surface waters), AA (fresh surface waters) with filtration avoidance determination or SA (saline surface waters).

Criterion 3: Automatically designated MS4 areas are extended to Town, Village or City boundaries, but only for Town, Village or City implementation of Minimum Control Measures (4) Construction Site Stormwater Runoff Control and (5) Post Construction Stormwater Management in Development and Redevelopment. This additional designation may be waived, by written request to the Department, where the automatically designated area is a small portion of the total area of the Town, Village or City (less than 15 %) and where there is

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Stormwater Management Program - the program implemented by the covered entity. Covered entities are required at a minimum to develop, implement and enforce a SWMP designed to address POCs and reduce the discharge of pollutants from the small MS4 to the MEP, to protect water quality, and to satisfy the appropriate water quality requirements of the ECL and Clean Water Act. The SWMP must address the MCM described in Part VIII.

The SWMP needs to include measurable goals for each of the BMPs. The measurable goals will help the covered entities assess the status and progress of their program. The SWMP should:

1. describe the BMP / measureable goal;
2. identify time lines / schedules and milestones for development and implementation;
3. include quantifiable goals to assess progress over time; and
4. describe how the covered entity will address POCs.

Guidance on developing SWMPs is available from the Department on its website. Examples of successful SWMPs and suggested measurable goals are also provided in EPA's Menu of BMPs available from its website. Note that this information is for guidance purposes only. An MS4 may choose to develop or implement equivalent methods equivalent to those made available by the Department and EPA to demonstrate compliance with the MCMs.

When creating the SWMP, the covered entities should assess activities already being performed that could help meet, or be modified to meet, permit requirements and be included in the SWMP. Covered entities can create their SWMP individually, with a group of other individual covered entities or a coalition of covered entities, or through the work of a third party entity.

Stormwater Management Program Plan- used by the covered entity to document developed, planned and implemented SWMP elements. The SWMP plan must describe how pollutants in stormwater runoff will be controlled. For previously unauthorized small MS4s seeking coverage, information included in the NOI should be obtained from the SWMP plan.

Stormwater Management Program Plan- used by the covered entity to document developed, planned and implemented SWMP elements. The *SWMP plan* must describe how pollutants in stormwater runoff will be controlled. For previously unauthorized *small MS4s* seeking coverage, information included in the NOI should be obtained from the *SWMP plan*.

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The *SWMP plan* is a separate document from the NOI and should not be submitted with the NOI or any annual reports unless requested.

The *SWMP plan* should include a detailed written explanation of all management practices, activities and other techniques the covered entity has developed, planned and implemented for their SWMP to address POCs and reduce pollutant discharges from their small MS4 to the MEP. The *SWMP plan* shall be revised to incorporate any new or modified BMPs or measurable goals.

Covered entities can create their *SWMP plan* individually, with a group of other individual covered entities or a coalition of covered entities, or through the work of a third party entity.

Documents to include are: applicable local laws, inter-municipal agreements and other legal authorities; staffing and staff development programs and organization charts; program budget; policy, procedures, and materials for each minimum measure; outfall and small MS4 system maps; stormwater management practice selection and measurable goals; operation and maintenance schedules; documentation of public outreach efforts and public comments; submitted construction site SWPPPs and review letters and construction site inspection reports.

The *SWMP plan* shall be made readily available to the covered entity's staff and to the public and regulators, such as Department and EPA staff. Portions of the *SWMP plan*, primarily policies and procedures, must be available to the management and staff of a covered entity that will be called upon to use them. For example, the technical standards and associated technical assistance documents and manuals for stormwater controls should be available to code enforcement officers, review engineers and planning boards. The local laws should be readily available to the town board and planning board. An integrated pest management program would have to be available to the parks department and the stormwater outfall and available sewer system mapping and catch basin cleaning schedule would have to be available to the department of public works.