

**MINUTES OF THE ONTARIO-WAYNE STORMWATER COALITION
BME OFFICE
JANUARY 17, 2017**

PRESENT: Al Benedict-Town of Victor, Norm Druschel-Town of Walworth, Linda Kleeman-Town of Walworth, Charlie DeMinck-Town of Walworth, Brian Frey-Wayne County Highway, Elaine Borgeest-OCSWCD, Kurt Rappazzo-MRB Group, Marilee Stollery-Town of Ontario, Ben Groth-DEC, Ken Wilson-Town of Victor, Cathleen Ohrich-Managed Services Team, Mike Simon-BME and John Turner-Village of Victor

Chairman Druschel called the meeting to order at 9:30 am.

MINUTES- Chairman Druschel asked for any comments or corrections to the December 20, 2016 meeting minutes; since there were none, the following motion was offered:

Motion: Marilee Stollery seconded by Ken Wilson

Resolved: The minutes of December 20, 2016 are accepted as read.

All yes, carried.

WEBSITE UPDATE-CATHY OHRICH-MANAGED SERVICE TEAM-Mike Simon stated that he and Kim Boyd reviewed the website and offered the following comments:

General:

- Update information (Update MS4 permit to GP-0-15-003)
- Every page should have a picture {About OWSC/What We Do}
- Add larger maps of the individual MS4s on each Representative Page
- Update links (many links no longer work, all links under What is a MS4? are broken)
- Make brochures readily available. They are embedded, too difficult to find, and located in different areas. Brochures should have a link on the home page.
- Add more information under Public Participation/Involvement
 - o Clean ups
- Reorganize Minutes for the most recent to be on top. Post the Agendas separately but on same page?
- Under Resources Tab
 - o Found more brochures under General Information, some are under Public Education and Outreach (put them under Brochures)
 - o Add maps
 - o Forms & Permits (Links are broken)
- Add a List Serv

Home Page:

- Update accomplishments from 2012?
- Change the Download Annual Report 2009-2010 and 2010-2011to look like other reports

Information to include:

- Additional Brochures that we have purchased
- Information about mini-grants with pictures
- Community Clean ups
- Internship activities and advertisement

Pictures to include:

- Community Signs
- Decals

After a lengthy discussion, everyone was in agreement that the website needs to be updated; Cathy agreed and stated that the site is so old it may stop working shortly; she will prepare a proposal to be reviewed by the coalition members. Mike said that Kim has spent a lot of time reviewing the current site and preparing the above comments.

OTHER/NEW BUSINESS-BEN GROTH-DEC-NEW PERMIT-Ben stated that the deadline for the comments is still February 3, 2017.

MEMORANDUM

To: **Steven McCague, NYS DEC – Division of Water, Bureau of Water Permits**

From: Kimberly Boyd, BME Associates
Ontario Wayne Stormwater Coalition Consultant

Date: **XXXX**

Re: DRAFT Renewal of the State Pollutant Discharge Elimination (SPDES) General Permit for Stormwater Discharges from Municipal Separate Storm Sewer Systems (GP-0-17-002)

Please accept the following comments and questions that are being submitting on behalf of the Ontario Wayne Stormwater Coalition (OWSC). The coalition is comprised of Ontario County Highway Department, Wayne County Highway Department, Towns of Ontario, Farmington, Walworth, Macedon, Victor, and the Villages of Macedon and Victor. The Coalition appreciates the opportunity to provide comments and is dedicated to maintaining and improving water quality.

General Comments:

This permit represents an enormous increase in administrative and technical effort that will strain our already struggling municipalities. The compliance schedule lists 23 requirements to be implemented within 6 months to a year of the permit effective date. Our MS4s have already completed and submitted their annual budgets for 2017. If the permit goes into effect during the middle of 2017, our MS4s will not have the funds allocated to fulfill these requirements. Implementation dates and all successive implementation year dates should not begin until the

MS4s have had time to evaluate the costs associated with the adopted permit requirements and have had an opportunity to gain budget approval. For example, if the permit is adopted in June of 2017, the compliance schedule should not begin until January of 2018. This allows the MS4 time to evaluate costs, prepare budgets, and have budgets approved.

Page 5: (Part III.B.1.) *“For sewer sheds to outfalls discharging to an impaired water listed in Appendix D, the MS4 Operator must develop and implement the pollutant specific best management practices (BMPs) (found in Part VIII) targeted towards the pollutant of concern causing the impairment. MS4 Operators implementing these pollutant specific BMPs in addition to the BMPs listed in Parts VI and VII will constitute compliance with Part III.A of this permit.”*

It is understood that this section applies to sewer sheds that drain to outfalls located within the urbanized area **and** which discharge to an impaired water listed in Appendix D. The SWMP addresses MS4 requirements within the urbanized area.

Page 5: (Part III.B.2.a.) *“In addition to the BMPs listed in Parts VI and VII, MS4 Operators discharging to waters within the watersheds listed in Table 2 must implement the BMPs and applicable retrofit plans as specified in Part IX to achieve the pollutant load reductions specified in the referenced TMDL.”*

It is understood that this section applies to sewer sheds that drain to outfalls located within the urbanized area **and** which discharge to waters within the watersheds listed in Table 2. The SWMP addresses MS4 requirements within the urbanized area.

Page 8: (Part IV.B.1) Administrative Requirements/Page 28. (Part VI. D. 6.) SWPPP Review/Page 29. 8. Construction Site Inspections

It is understood that a formal training course on the requirements of this permit has been or will be developed by the DEC or DEC endorsed trainer and will be offered to SWMP Coordinators.

Please elaborate more on “training endorsed by the department”. Why is there a monopoly on training? Any qualified person or entity should be allowed to develop and offer a SWMP course or a SWPPP review course, especially if the training personnel are certified by nationally recognized organizations, such as EnviroCert International. How often will the Soil & Water Districts offer training courses? A more cost-effective option, would be an online training module that MS4s could access at their convenience when they hire new personnel. These required courses should be free to MS4s.

Page 9: (Part IV.C.1.)

It is not reasonable to incorporate all of the information listed in this section into a single map. A single map showing the entire small MS4 conveyance system within the regulated area and containing all of the features listed will become very cluttered. Some of the new datasets involve large amounts of data (land cover, topography). The county hasn’t mapped many of these features (catch basin connections, post-construction SMPs, locations of illicit discharges, etc.) and require multipart labeling. MS4s should be given some flexibility on how they manage all of this information, not necessarily in the form of one comprehensive map.

Page 14: *(Part V.A.) Program Evaluation. “For each year of permit coverage, the MS4 Operator must conduct an annual evaluation of its compliance with the terms and conditions of this permit and submit this evaluation with an Annual Report.”*

Is there going to be additional guidance for the annual evaluation? We recommend creating an evaluation form because this requirement is vague and could be interpreted in several different ways. Will someone from the DEC read the evaluations and provide constructive feedback?

Page 16: *(Part VI.A.1.a.) Program Development. A. Identify Significant Areas of Concern. “Areas prone to erosion”*

This requirement is vague and could be interpreted differently. Please clarify to what degree of erosion you expect MS4s to identify.

Pages 22 & 58: *(Parts VI.C.1.a.vi. & VII.C.1.f.) To access property for inspection*

Does “property” include facilities or the interior of structures? Can you elaborate more on the definition of property?

Pages 23 & 59: *(Parts VI.C.4.b.i. & VII.C.4.b.i.) “Provide annual training for all individual(s) responsible for outfall inspection and sampling on the MS4 Operator’s procedures...”*

This is a new requirement. Most MS4s do not currently have sampling procedures in its SWMP and lack the expertise needed to provide training in this area.

Pages 24 & 59: *(Parts VI.C.4.b.ii.a. & VII.C.4.b.a.) Inspect High Priority Outfalls at least once per year*

This requirement could be very costly and time consuming for small MS4s with a large amount of High Priority Outfalls. Over the past permit years, outfalls have been routinely inspected at the 20% frequency rate. This inspection schedule has successfully helped communities with their IDDE programs. The annual inspection frequency is another permit requirement that will increase labor costs and generate additional documentation with very little proven benefit.

Pages 24 & 59: *(Parts VI. & VII.C.4.b.iv.) “Sample all flowing outfalls with any physical indicator of an illicit discharge (i.e. odor, color, turbidity or floatables) as follows...”*

It does not seem very practical to run quantitative field tests for color or turbidity on a flowing outfall. Most MS4s do not currently have sampling procedures in its SWMP and lacks expertise in this area. MS4s would likely have to rely on an outside vendor to conduct sampling, which will increase costs.

It would be beneficial to MS4s, if the DEC could provide recommendations or a list of approved sampling kits for use in our stormwater programs. Also, please consider having the DEC or Soil & Water Conservation Districts establish contracts with an approved supplier and offer (not require) MS4s to purchase the test equipment at a reduced rate. This would ensure that MS4’s are utilizing appropriate field kits and sampling equipment.

Pages 25/26 & 61: *(Parts VI.C.5.d.iii. & VI.C.6.a.ii. & VII.C.5.d.iii.) “Initiate track down procedures for all other illicit discharges no later than 5 days of discovery”.*

5 calendar days or 5 business days?

Pages 26 & 61: (Part VI.C.6.a.iii.) & (Part VII.C.6.a.iii.) “Where identification of a responsible party or when elimination of an illicit discharge within 60 days of its identification is not possible, the MS4 Operator shall provide advance written notice to the Regional Water Engineer within 30 days of becoming aware of the illicit discharge.”

This timeline does not make sense. If our MS4s have 60 days to investigate, then they should not have to notify the Regional Water Engineer until the end of the 60 days. Should “within 30 days” be changed to “within 90 days” of becoming aware of the illicit discharge? This gives the MS4 60 days to investigate and if identification is not possible, then an additional 30 days to report. What is the purpose of reporting to the Regional Water Engineer? Reporting the problem will not help resolve the problem, unless the Engineer will provide support in tracking down the discharge. Should the MS4 expect this type of support?

Pages 27 & 63: (Parts VI.D.3. & VII.D.3.) Construction Program Education and Outreach “The MS4 Operator must educate all those involved in the construction activity itself, as well as municipal staff and other individuals involved in the review of SWPPPs, inspections and related enforcement on...”

“**must** educate all those involved in the construction activity” appears to place the burden of educating contractors, subcontractors, and their employees in all aspects of the process directly on the MS4. This does not seem practical. The contractor training requirements detailed in Part VIII.A.4.a.vii of GP-0-15-003 are more realistic and measurable.

Pages 27 & 63: (Parts VI.D.4.) & (VII.D.4.) Inspection History (Dates and ratings)
Please clarify “*ratings*” by including the expected ratings: (unsatisfactory, marginal, satisfactory).

Pages 28 & 64: (Parts VII.D.6.a.) & (VII.D.6.a) “Ensure individual(s) responsible for SWPPP review receive two (2) hours in Department endorsed SWPPP review training and four (4) hours of Department endorsed training in proper erosion and sediment control principles from a Soil & Water Conservation District or other endorsed entity. Individual responsible for review of post construction SMPs must be qualified professionals or under the supervision of a qualified professional.”

This is a new requirement. Most MS4s do not currently have individuals trained in SWPPP review or qualified professionals available to conduct SWPPP reviews and will likely have to rely on outside consultants to provide these services which will increase costs. Please consider exclusions for SWPPP review training for qualified professionals (employees/personnel with nationally recognized certifications: PE or CPESC).

Pages 29 & 66: (Parts VI.D.8.a.) & (VII.D.8.a.) “MS4 Inspectors must receive two (2) hours of Department endorsed training on MS4 Oversight Inspections and four (4) hours of Department endorsed training in proper erosion and sediment control principles from a Soil & Water Conservation District or other endorsed entity every three (3) years.”

This is a new requirement. County does not currently have staff trained in MS4 Oversight Inspections. It is understood that a formal training course on MS4 Oversight Inspections has been or will be developed by the DEC or DEC endorsed trainer and will be offered to MS4

Inspectors. Please consider exclusions for MS4 Oversight Inspection training for qualified professionals (employees/personnel with nationally recognized certifications: PE or CPESC).

Pages 30 & 66: (Parts VI.D.8.a.) & (VII.D.8.a.) “MS4 Inspectors must receive two (2) hours of Department endorsed training on MS4 Oversight Inspection and four (4) hours of Department endorsed training in proper erosion and sediment control principles from a Soil & Water Conservation District or **other endorsed entity** every (3) years.”

Can you provide a list or website with contact information for the "other endorsed entity"?

Page 31: 1. Applicable Post Construction Stormwater Management Practices

The first bullet states that an MS4 only needs to include “SMP’s directly discharging to the MS4 that have been installed as part of any SPDES General Permit for Stormwater Discharges from Construction Activity or individual SPDES permit (since March 10, 2003).” This date was in the previous permit and is reasonable. However, when reading the rest of the bullets, it can be interpreted that **all** post-construction SMP’s will need to be included in the program, no matter if they were built in the 1970s or even before then.

- “All SMPs owned or operated by the MS4 Operator” Even those built prior to 2003?
- “SMPs discovered to discharge through the MS4” Even those built prior to 2003?

If the permit, intends to only regulate SMP’s since March 10, 2003, then the time period should be included in the main portion of the heading under number 1. *Applicable Post Construction Stormwater Management Practices*. If the permit intends to regulate SMPs built prior to 2003, this will be an extremely difficult and time intensive task.

Also, footnote number 9 mentions that the Final Designation Criteria for Identifying Regulated Municipal Storm Sewer Systems was adopted in January of 2010. Many municipalities were not documenting SMPs outside of the urbanized areas prior to 2010, because it was not a requirement. Therefore, the time requirement for SMPs to be included in the program that are outside of the urbanized area should not begin until January of 2010.

Pages 34 & 69 (Parts VI.E.5.a.) & (VII.E.3.a.) “Ensure individual(s) responsible for inspection and maintenance will receive training.”

The footnotes indicates that the DEC has developed training modules for the MS4s. Are these training modules available online? If not, will and/or when will these be available online? Will there be a cost associated with the training modules or are they free? The courses should be free to MS4 employees.

Pages 35 & 70: (Parts VI.F.1.iv.) & (VII.F.1a.ii.d.) “All facilities and operations must be in compliance with the terms and conditions of this permit within 3 years of the effective date of this permit.”

Consider increasing timeframe to 5 years to allow municipality’s sufficient time to conduct assessments and obtain what could be extremely, costly funding. The 5 year timeframe for achieving compliance may also be unrealistic when you have to consider the realities of municipal budgets and competing priorities.

Page 38 & 73: (Parts VI.F.2.g.) & (VII.F.2.g.) “Address waterfowl congregation areas where needed to reduce waterfowl droppings from entering the MS4.”

Are MS4 personnel expected to become wildlife biologists? “Address waterfowl congregation” is very vague. If MS4’s try to discourage concentrations of waterfowl congregation on MS4 property, will that not just push or relocate waterfowl onto someone else’s property where droppings will still enter the MS4’s drainage system? Are you suggesting that MS4s should spend taxpayer’s money on removing droppings or terminating waterfowl? Environmentalists and wildlife enthusiasts may not support this requirement. This requirement needs more consideration and the DEC should offer additional guidance as to how MS4s should “address” waterfowl congregation. Unless there is a well-established, effective, practical and humane BMP for how to address waterfowl congregations, this requirement should be removed.

Pages 38 & 73: (Part VI.F.2.g.) & (VII.F.2.g.) “Address erosion or areas with poor vegetative cover, especially if the erosion is within 50 feet of a surface water”.

This vague requirement should be removed from the permit. Addressing eroded areas or areas with poor vegetative cover on municipal property and especially right-of-ways is extremely unrealistic. The time and manpower needed to identify these areas and then the costs associated with conducting repairs would be astronomical. The benefits to water quality would not outweigh the cost to taxpayers.

Pages 40 & 75: (Parts VI.F.2.o.) & (VII.F.2.o.) “Maintain all BMPs, If corrective actions prior to the next anticipated stormwater event is impracticable, they must be initiated within 7 days and completed within 30 days of inspection.”

Repairs or corrective actions involving structural BMPs may require special funding and would not be completed within 30 days of inspection. Timelines should be extended for structural BMPs requiring special funding.

Pages 42 & 77: (Parts VI.F.3.c.) & (VII.F.3.c.) “Within 2 years of the effective date of this permit, MS4 Operators shall develop and implement a facility-specific Stormwater pollution prevention (SWPPP) for each high priority facility within the regulated area.”

The 2 year deadline may be financially taxing for municipalities with multiple high priority facilities. The MS4s annual budget for the first year of the permit has already been submitted. Therefore, many municipalities will not be able to start budgeting money towards this requirement until the second year of the permit. Also, many MS4s will most likely need help from private consultants to prepare their SWPPPs. Please consider extending the deadline to 5 years to allow MS4s to adequately budget the time and cost of developing these comprehensive SWPPPs.

Pages 46 & 81: (Parts VI.F.3.e.) & (VII.F.3.e.) “High Priority Facility Assessments, Quarterly Visual Monitoring”

Consider reducing the quarterly visual monitoring frequency to twice a year. Since MS4s will be creating comprehensive SWPPPs and verifying or installing multiple BMPs, the need for quarterly visual monitoring appears to be unnecessary and extremely time consuming with very little benefit.

Pages 46 & 81: (Parts VI.F.3.e.i.) & (VII.F.3.e.i.) “Where practicable, the same individual should carry out the collection and examination of discharges for the entire permit term for consistency.”

This bullet should be deleted. Permit requirements with caveats such as “where practicable” should be avoided.

Pages 47/48, 82/83: (Parts VI.F.3.f.) & (VII.F.3.f.) Low Priority Facilities

Parking lots should be excluded as a facility that needs a Municipal Facility/Operation Assessment Form. Filling out 7 pages on a form with mostly “not applicable” answers is a huge waste of paper, time, and resources. If parking lots cannot be excluded from this requirement, the DEC might want to consider creating a one page form specifically for parking lots, cemeteries, and swimming pools.

Pages 49/50, 84/85: (Parts VI.F.4.a.i.) & (VI.F.4.a.i.b.) “The MS4 Operator shall develop and implement a plan to optimize catch basin inspection and cleaning with the goal that catch basins are cleaned before exceeding 50% of sump capacity.”

MS4s already have a catch basin cleaning program in place. What is the scientific basis for cleaning catch basin’s before reaching 50% capacity? Why was a 50% capacity chosen and not 75% capacity? Inspecting, measuring, and documenting the level of debris captured in a catch basin is an unnecessary and burdensome task that will reduce efficiency, increase labor costs, and ultimately cost the taxpayers more money. Has there been actual studies that prove this type of documentation and evaluation is truly beneficial to water quality, or is it a perceived benefit?

Pages 52 & 86: (Parts VI.F.4.b.i.) & (VII.F.4.b.i.) “Street Sweeping Streets in business districts, commercially zoned areas and any other area where catch basin inspections identify high volumes of trash and debris shall be swept monthly.”

For several communities, increasing street sweeping to a monthly basis (in some areas) will require purchasing expensive equipment and hiring additional personnel. Street sweeping frequency should be on an “as needed basis” and not required at a mandated frequency. Forcing MS4s to sweep streets that may not need sweeping is a waste of taxpayer money. Many communities rent this equipment once or twice a year. It is not practical to sweep streets monthly and certainly not in winter months.

Pages 53 & 88: (Parts VII.F.4.b.iv.) & (VII.F.4.b.iv.) “Considerations for use of calcium magnesium acetate for deicing around bridges to minimize corrosion;”

This bullet should be deleted. Permit requirements with caveats such as “considerations for” should be avoided. Furthermore, operations are not geared to apply calcium magnesium acetate just around bridges and it is impractical to use system wide.

Page 63: (Part VII.D.2.a.vii.) “To receive and collect information related to compliance with the approved SWP PP including verification of maintenance of post-construction SMPs (if conducted by private entities)”

Tasks such as collecting information related to compliance and verification of maintenance of post-construction SMPs conducted by private entities on private property should remain with the traditional land use control MS4s.

Page 67: (Part VII.E.) MCM 5 - Post Construction Stormwater Management

The MS4 Operator must develop, implement and enforce a program to control the discharge of pollutants to the MS4 through the proper operation and maintenance of existing stormwater management practices and those constructed on new or redeveloped sites as required under

Page 62: (Part VII.D.)

It is understood that MCM 5 addresses post construction stormwater management practices constructed on sites within the urbanized area.

Page 67: (Part VII.E.1.) “SMPs directly discharging to the MS4 that have been installed as part of the CGP or individual SPDES permit (since March 10, 2003) where there is a contractual agreement for maintenance; “

It is not clear if this refers to situations where an SMP is constructed on private property and the MS4 was granted an easement for maintenance of the SMP. It is not practical for local governments to oversee or enforce private maintenance agreements. Furthermore, it is impractical for a traditional non-land use control or non-traditional MS4 to inventory, track, inspect, etc. SMPs located on private property. This needs clarification.

Page 68: (Part VII.E.1.) “Other SMPs discovered to discharge directly to the MS4 provided a contractual agreement for maintenance is established 17.”

“17 SMPs where the MS4 Operator cannot ensure maintenance are illicit connections addressed through Part VII.C.”

It is not clear if this refers to situations where an SMP is constructed on private property and the MS4 is subsequently granted an easement for maintenance of the SMP. It is not practical for local governments to manage or enforce private maintenance agreements. Furthermore, it is impractical for a traditional non-land use control or non-traditional MS4 to inventory, track, inspect, etc. any SMPs located on private property. This needs clarification.

Page 69: (Part VII.E.3.e.) “Initiate enforcement provisions for privately owned SMPs within 60 days if follow-up actions not complete.”

Enforcement provisions for privately owned SMPs should be the responsibility of the traditional land use control MS4s. The traditional non-land use control or non-traditional MS4 may cooperate in such an action, to the extent of its authority, with the traditional land-use control MS4.

Page 91: (Part VIII.A.5.b.) “Sweep streets in sewershed to impaired segment monthly.”

For several communities, increasing street sweeping to a monthly basis will require purchasing expensive equipment and hiring additional personnel. Street sweeping frequency should be on an “as needed basis” and not required at a mandated frequency. Forcing MS4s to sweep streets that may not need sweeping is a waste of taxpayer money.

Page 91: (Part VIII.A.5.c.) “Repair all outfall protection and/or bank stability problems identified during inspection of outfalls within 30 days of inspection.”

The 30 day corrective action requirement is unrealistic. Repairs may require special funding. Please consider changing to “Initiate corrective action or scheduling of repairs within 30 days

and complete within a reasonable timeframe.” Inclement weather could also delay repairs beyond 30 days of inspection/discovery

Page 92: (Part VIII.B.2.) Mapping “Waterfowl congregation areas on municipal property or right of way.”

Are MS4s expected to become Wildlife Biologists? Identifying waterfowl congregation can be subjective. What are the triggers for identifying waterfowl congregation?

Page 95: (Part VIII.4.b.) Wildlife Control “Identify municipal owned facilities with high bird populations and evaluate deterrents, population controls and other measures that may reduce bird related pathogen contributions.”

See questions regarding waterfowl congregation from above, Pages 38 and 92. Deterrents are a great idea, but again won’t waterfowl congregate on adjacent properties where droppings will still enter the MS4? If so, then MS4s will have to deal with irate citizens who now have waterfowl droppings on their property. This requirement needs more consideration and the DEC should offer additional guidance as to how MS4s should deter and control waterfowl populations.

Page 99: (Part VIII.D.) Pollutant Specific BMPs for Floatables

When will this section be available for public comment?

Page 99: (Part VIII.E.) Pollutant Specific BMPs for Silt/Sediment

When will this section be available for public comment?

Page 138: Urbanized Area (UA) “SWMPs are only required within the UA”.

Is this statement accurate? If, MCM 5 & 6 extend to the municipal, town, and village boundaries, then the SWMP should also extend to the municipal, town, and village boundaries for those two measures. This statement should be reworded. Also, the permit in general needs to clarify more pronouncedly that MCM 5 & 6 extend to the municipal, town, and village boundaries, if that is the intent.

Appendix B: Annual Reporting Requirements

When will this section be available for public comment?

Form: Stormwater Pollution Prevention Plan Review Checklist

First page, first bullet: *SWPPP contains completed final NOI*. Consider adding “application” after NOI. Several people confuse the NOI application and the NOI Acknowledgment Letter.

First page, third, fourth and tenth bullets and second page, sixth bullet: Often times during the initial SWPPP review, a contractor has not been selected or hired by the developer. Therefore, all of these checkmarks would be NO. The contractor certifications, trained contractor, and contractor responsible for construction of the SMPs are usually identified at the pre-construction meeting.

First page, last bullet, bottom line: There is a spelling error: “*patterns*”

Form: Municipal Facility/Operation Assessment Form

First Page SWPPP *b. Does the facility have MS4s that discharge to any surface waters?* Please reword question. Should this be outfalls instead of MS4s?

First Page Good Housekeeping *a-e.* Please consider adding check boxes with Yes, No and “not applicable” or “n/a”. Many of these questions are not applicable for some low priority facilities.

All Pages: Please consider adding not “applicable” or “n/a” to the headings or within each section. Many areas are not applicable for most parking lots, cemeteries, etc.

Documentation Errors

Page 8: (Part IV.B.2.c.)

Change GP-0-15-003 to the new permit GP-0-17-002 here and throughout entire permit where reference to GP-0-15-003 was made.

Pages 8 & 11: Certification Statements

The Certification Statements on pages 8 and 11 incorrectly refer to the *New York State Department of Environmental Conservation SPDES General Permit for Stormwater Discharges from Municipal Separate Storm Sewer Systems (MS4s), Permit No. GP-0-17-002*, as the *New York State Pollutant Discharge Elimination System (“SPDES”) General Permit for Stormwater Discharges from the Municipal Separate Storm Sewer Systems (“MS4 GP”)*.

Remove “the” here and throughout the permit where this reference is made.

Page 8 & Throughout Permit:

Throughout the permit, the New York State Department of Environmental Conservation SPDES General Permit for Stormwater Discharges from Construction Activity, Permit No. GP-0-15-002, is incorrectly referred to using the words “Associated” and “Activities”. Please correct the title to accurately reflect the title on the permit. For example: SPDES General Permit for Stormwater Associated with Construction Activities GP-0-15-002, the SPDES General Permit for Stormwater from Construction Activities (GP-0-15-002), the SPDES General Permit for Stormwater Discharges Associated with Construction Activity, GP-0-15-002, and the SPDES General Permit for Stormwater Discharges from Construction Activities (GP-0-15-002).

Page 14: (1.) Annual Reports

Documentation error, please change to **1.** *Annual Reports* to **2.** *Annual Reports*

Page 28: (5.) Construction Site Prioritization

Possible documentation error, please double check the reference (*See Part VI.D.9*).

Page 28: (6.a.) Ensure individual(s)

Please add in the footnote (“*Except qualified professionals*”) as written on Page 64 regarding exceptions for SWPPP review training for Qualified Professionals.

Page 28: Footnote

Possible documentation error, please update the two references in the footnote. Neither reference appears accurate.

Page 30: (c.)

Documentation error, please add a period at end of sentence.

Page 31: (E.1.) SMPs discovered to discharge through the MS4

Possible documentation error, SMPs discovered to discharge "through" the MS4. Should this be "into"? If this is not a documentation, can you please explain what you mean by through an MS4?

Page 34: (5.b.)

Part IV.E.4 Please update reference, this reference appears incorrect.

Page 35: (F.1.)

MCM6 Add space between M and 6.

Page 40: (p.) Assess Compliance first bullet - Part VI.F.4.c.

Please update reference, this reference appears incorrect.

Page 41: (VI.F.3.b) High Priority Facilities - Part VII.F.4.c

Please update reference, this reference appears incorrect.

Page 61: (Part VII.C.5.d.)

- i. Initiate track down procedures for flowing outfalls with obvious illicit discharges (a severity score of 3 for any physical indicator as described in Section 11.7 of the IDDE Guidance) immediately but no later than 24 hours ~~of~~ **after** discovery;
- ii. Initiate track down procedures for all other illicit discharges no later than 5 days ~~of~~ **after** discovery.

Page 61: (Part VII.C.6.a.)

- i. Discharges that pose a significant threat to human or environmental health shall be eliminated immediately but no later than 24 hours **after discovery**;
- iii. Initiate elimination procedures for all other illicit discharges no later than 5 days ~~of~~ **after** identification of responsible party;

Page 62. (Part VII.D.2a.)

- ii. **To** require post construction SMPs as required by **the** CGP **that** meet the sizing criteria specified in the New York State Stormwater Management Design Manual and performance criteria (or equivalent), including Operation & Maintenance Plans for long term maintenance;
- iv. To require construction site operators **to** control waste such as discarded building materials, concrete truck washout, chemicals, litter and sanitary waste that may cause adverse impacts to water quality;

Page 64: (Part VII.D.5.) Construction Site Prioritization

Please double check reference (*See Part VII.D.9*), shouldn't it be Part VII.D.8?

Page 69: (Part VII.E.3.b.)

Please double check reference (See Part VII.D.7), shouldn't it be Part VII.D.6?

Page 72: (Part VII.E.3.e)

Add a space after 1st bullet.

Page 73: (Part VII.F.2.g.)

*Specify proper use, storage, and disposal of pesticides and herbicides including minimizing the use of these products and using only in accordance **with** manufacturer's instruction.*

Page 74: (Part VII.2.k.)

Please change reference from Part VII.F.3 to Part VII.F.4.

Page 75: (Part VII.F.2.0.)

*If corrective actions prior to the next anticipated storm event **is are** impracticable, they must be initiated within 7 days and completed within 30 days of inspection.*

Page 81: (Part VII.F.3.e.i.)

***e) a)** The MS4 Operator must conduct quarterly visual monitoring of the outfalls discharging stormwater from fueling areas, storage areas, vehicle and equipment maintenance/fueling areas, material handling areas and similar potential pollutant generating areas...*

Page 82 (Part VII.F.3.3.i.)

***d) b)** Corrective and follow up actions - If the visual examination indicates the presence of stormwater pollution (e.g., color, odor, floating solids, settled solids, suspended solids, foam, oil sheen, or other indicators), the MS4 Operator must, at minimum, complete and document the following actions...*

Page 133: (Part XI.B.)

***Green Infrastructure** - Green infrastructure **are is** stormwater management and treatment practices that...*

Page 134: (Part XI.B.)

***Major Outfall** - a municipal separate storm sewer outfall that discharges from a single pipe with an inside diameter of 36 inches or more or its equivalent discharge from a single conveyance other than circular pipe which 50 acres); or for municipal separate storm sewers that receive storm water from lands zoned for industrial activity (based on comprehensive zoning plans or the equivalent, an outfall that discharges from a single pipe with an inside diameter of 12 inches or more or from its equivalent (discharge from other than a circular pipe associated with a drainage area of 2 acres or more)*

Extraneous and missing parentheses, unnecessary hard return and missing punctuation in this paragraph create confusing, broken sentences.

Suggest deleting parenthesis after "... 50 acres)".

Suggest adding parenthesis after ...zoning plans or the equivalent".

Suggest deleting hard return after "...storm water from lands zoned",
Suggest adding a period at end of paragraph.

Page 135: (Part XI.B.)

Non-traditional MS4s - state and federal prisons, office complexes, hospitals; state: transportation agencies; university campuses, public housing authorities, schools, other special districts.

Extraneous or improper punctuation in this paragraph may create confusion. The colon in "state: transportation agencies..." could be misinterpreted as state transportation agencies, state university campuses, state public housing authorities, etc. Suggest deleting the colon in "state: transportation agencies".

Form: Notice of Intent (NOI) to Continue Coverage

Page 3 of 3, #4. Correct Spelling Error "Coordinator is sthe person..."

Ben will verify if the Village of Macedon did not file to continue coverage they can opt out since the Village is dissolved. All comments should be back to Kim by Friday, January 20, 2017. All of the members wanted to thank Kim Boyd and John Berry for their work on the new permit comments.

INTERN-The following draft job description was prepared by Kim Boyd

DEPARTMENT: Ontario County Soil & Water Conservation District

SUPERVISOR: Patrick J. Emerick – District Manager/Varies per municipality

CIVIL SERVICE CLASSIFICATION: Labor

TERM OF ASSIGNMENT: 10 Weeks

HOURS PER WEEK: Average **40 Hours** per week; work is mostly conducted during regular business hours; occasional extended and weekend hours, if needed

COMPENSATION: \$12 per hour

ABOUT THE INTERNSHIP:

The Ontario-Wayne Stormwater Coalition is seeking a student to help us comply with the federal stormwater regulations and improve water quality. A highly motivated student will learn principles and gain experience in stormwater management and National Pollutant Discharge Elimination System (NPDES) permit compliance. Interns support full time staff in promoting water quality monitoring, stormwater inspection programs, tracking municipal operations, and public outreach. An internship with the Ontario-Wayne Stormwater Coalition will provide a rich opportunity to learn a variety of environmental management skills, as well as provide exposure to citywide operations and procedures.

DUTIES INCLUDE:

- Assists staff members with preparation and review of various documents
- Assists staff members with data collection and completion of informative reports.
- Compiles background information/data
- Attends meetings and/or training sessions as requested and reports on current activities/projects and outcomes
- Consults with key officials, staff, and members of the general public

EDUCATION:

This position is for current high school or college students and involves responsibility for assisting staff members with a wide range of tasks. The employee works under the immediate supervision of a professional staff member. Does related work as required. Preferred majors include Environmental Studies, Urban and Regional Planning, Environmental Engineering, Biological Science, Ecology, Soil Science, Geography, or other related majors.

ESSENTIAL KNOWLEDGE, SKILLS AND ABILITIES:

- Good knowledge of research methods and techniques
- Good knowledge of the English language
- Working knowledge of government practices and procedures
- Ability to collect, organize and abstract various data
- Ability to understand, interpret and carry out written and oral instruction
- Initiative and resourcefulness
- Basic proficiency with MS Office suite (Outlook, Word, Excel)
- Capable of walking long distances on potentially difficult terrain
- Excellent verbal and written communication skills
- Ability to engage the public and participate in workshops and training events
- Ability to work well individually with minimal supervision, and as a team player
- Valid driver's license with clean driving record

HOW TO APPLY:

Email Resumes with Subject Line: [OWSC Internship](#) to Scott Allen at buildinginspector@macedontown.net

Questions? Please contact: Scott Allen at 315-986-5932
 Patrick J. Emerick at 585-396-1450
 Kim Boyd at 585-377-7360 x133

Chairman Druschel commented that the work plans need to be submitted prior to the hiring of an intern; the intern should be in place by March. Brian Frey wanted to thank Kim for her efforts, she does a good job. Ben Groth will also review the draft job

description. When it is finalized, it will be posted at FLCC, Craig List and the MS4 member's website and the MS4 website.

BILLS-

Motion: Marilee Stollery seconded by Brian Frey

Resolved: The following bills are approved for payment: BME-\$973.75 and Managed Services Team-\$86.25.

All yes, carried.

TREASURER REPORT-

Motion: Ken Wilson seconded by Marilee Stollery

Resolved: The treasurer report for December 31, 2016 in the amount of \$68,902.81 is approved.

All yes, carried.

ADJOURNMENT-

Motion: Marilee Stollery seconded by Brian Frey

Resolved: The meeting is adjourned at 11:00 am.

All yes, carried.

The next meeting will be held on February 21, 2017 at 9:30 am at the Victor Town Hall.

Elaine Borgeest, Recording Secretary