

**REPORTING YEAR THREE
YEAR ENDING MARCH 9, 2006**

**MS4 Municipal Compliance Certification (MCC)
and Stormwater Management Program
Annual Report (SWMPAR)**

Submitted To:

New York State Department of Environmental Conservation

MS4 Permit Coordinator
625 Broadway
Division of Water - 4th Floor
Albany, New York 12233-3505

Submitted By:



**Buffalo and Fort Erie Public Bridge Authority
MS4 SPDES No. NYR20A422**

One Peace Bridge Plaza
Buffalo, NY 14213
Phone: (716) 884-6744 ext. 242

May 31, 2006



**Phase II SPDES General Permit for
Stormwater Discharges from Municipal Separate Storm Sewer Systems (MS4s), GP-02-02
MUNICIPAL COMPLIANCE CERTIFICATION (MCC) FORM**

Regulated MS4: BUFFALO AND FORT ERIE PUBLIC BRIDGE AUTHORITY **SPDES Permit Number:** NYR20A422

See information packet for information to help complete this form.

MCC Form for year ending: March 9, <input checked="" type="checkbox"/> 2006 (Year 3) <input type="checkbox"/> 2007 (Year 4) <input type="checkbox"/> 2008 (Year 5)			
Section A. MS4 Owner/Operator and Contact Person Information (contact persons explained in instructions)			
Owner/Operator Is information below new or changed? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
Name: Anthony Braunscheidel		Title: Facilities Manager	Department:
Mailing Address:	Street or P.O. Box: One Peace Bridge Plaza	City: Buffalo	
	County: Erie	State: NY	Zip Code: 14213-2494
Phone: (716) 884-6744 ext. 242		E-mail Address: adb@peacebridge.com	
Local Stormwater Public Contact (Required by Minimum Measure 2)			
Is information below: 1) new or changed? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No 2) same as: <input checked="" type="checkbox"/> Owner/Operator			
Name:		Title:	Department:
Mailing Address:	Street or P.O. Box:	City:	
	County:	State:	Zip Code:
Phone: ()		E-mail Address:	
Stormwater Management Program (SWMP) Coordinator (Responsible for implementation/coordination of SWMP)			
Is information below: 1) new or changed? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No 2) same as: <input checked="" type="checkbox"/> Owner/Operator <input type="checkbox"/> Local Stormwater Public Contact			
Name:		Title:	Department:
Mailing Address:	Street or P.O. Box:	City:	
	County:	State:	Zip Code:
Phone: ()		E-mail Address:	
Annual Report Preparer			
Is information below: 1) new or changed? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No 2) same as: <input type="checkbox"/> Owner/Operator <input type="checkbox"/> Local Stormwater Public Contact <input type="checkbox"/> SWMP Coordinator			
Name: Jaime Davidson		Title: Senior Engineer	Department:
Mailing Address:	Street or P.O. Box: Parsons 180 Lawrence Bell Drive, Suite 104	City: Williamsville	
	County: Erie	State: NY	Zip Code: 14221
Phone: (716) 633-7074 ext. 245		E-mail Address: Jaime.Davidson@parsons.com	

IMPORTANT NOTE: Rows can be added to the tables in the following sections by going to the rightmost cell in the bottom row of the table and hitting tab. Hitting return in a given row will make the row wider, creating more room to type or write.

Section B. Local Water Quality Information

Information to help complete this section can be found in the instructions.

1. Does the MS4 discharge to 303(d) listed waters or is it in a TMDL watershed?

Yes (complete the table below) No Not Yet Determined

(Put an X in the 'Classification' cell to indicate if the MS4 discharges to a waterbody on the 303(d) list and / or if it is in a TMDL watershed.)

Impaired Waters Name (from 303 (d) list and/or TMDL)	Pollutant(s) of Concern (from 303 (d) list and/or TMDL)	Classification	
		303 (d)	TMDL

2. Have you received notification from the Department that you are subject to the special conditions in Part III.B. of the permit?

Yes
 No

3. Have all necessary changes been made to the Stormwater Management Program (SWMP) to ensure compliance with Part III.B. of the MS4 permit for discharges to 303(d) or TMDL waters?

Yes
 No (explain below)

Explanation:

Section C. Partnership Information

Information to help complete this section can be found in the instructions.

1. Does your MS4 work with partners? Yes (complete table below) No (Proceed to Section D)

List MS4 Partners with Legally Binding Agreements or Contracts in Place

Western New York Stormwater Coalition (Members listed below)

Erie County

Alden (V)
Amherst (T)
Angola (V)
Aurora (T)
Blasdell (V)
Boston (T)
Buffalo (C)
Cheektowaga (T)
Clarence (T)
Depew (V)
East Aurora (V)
Eden (T)
Elma (T)
Evans (T)
Grand Island (T)
Hamburg (V)
Hamburg (T)
Kenmore (V)
Lancaster (V)
Lancaster (T)
Orchard Park (T)
Tonawanda (C)
Tonawanda (T)
West Seneca (T)
County of Erie - Highways
County of Erie - Sewer District #6

Niagara County

Lewiston (V)
Niagara Falls (C)
North Tonawanda (C)
Pendleton (T)
Porter (T)
Wheatfield (T)
Youngstown (V)
County of Niagara

Other MS4s

Buffalo and Fort Erie Public Bridge Authority
State University of New York at Buffalo

List MS4 Partners with Planned Legally Binding Agreements or Contracts

Western New York Stormwater Coalition (Members listed below)

Alden (T)
Lackawanna (C)
Sloan (V)
Williamsville (V)
Cambria (T)
Lewiston (T)

List MS4 Partners with Other Agreements in Place

Section D. Geographic Areas Addressed by Stormwater Management Program (SWMP)

Information to help complete this section can be found in the instructions.

1. Does your SWMP cover all jurisdictional (automatic and additionally designated) areas within the MS4, as required by 40 CFR 122.32(a)? Yes No (Explain below)

Explain:

Section E. Funding and Resource Allocation

Information to help complete this section can be found in the instructions.

1. Are adequate resources (funding mechanism, equipment, staff, etc.) planned or in place to fully implement your SWMP no later than January 8, 2008? Yes No (explain below)

Explain:

The Authority has contracted with an engineering consultant (Parsons) to provide stormwater services. Parsons will work with existing Authority personnel to implement the SWMP developed in Year Two. The Authority currently owns equipment necessary for maintenance of the stormwater conveyance system.

2. If the MS4 is receiving funding through the municipal budget, a grant, or other source, briefly explain below: what are the sources, estimated amounts, and frequency of funding for the MS4?

Explain:

Authority Budget

WNY Stormwater Coalition Participation Fee - \$2,500 (annual)
Consultant Fee – Approximately \$10,000 (determined on an annual basis)

Western New York Stormwater Coalition (40 MS4s):

Round 6 WQIP Project - \$500,000
Round 7 WQIP Project - \$328,000
U.S. EPA Region 2 - \$150,000

3. If the MS4 is not receiving funding, briefly explain below: plans the MS4 has for obtaining future funding?

Explain:

Section F. Compliance Certification

Compliance Assessment - For each of the minimum control measures, indicate below if your program has made steady progress toward full implementation *and* has achieved all measurable goals scheduled to be completed **during this reporting year**. Refer to the NOI and prior Annual Reports for information about measurable goals scheduled for this reporting year.

Permit Part	Minimum Control Measure	ANSWER BOTH COLUMNS FOR THIS REPORT YEAR ONLY	
		Steady Progress	Goals Achieved
IV.C.1.	Public Education and Outreach on Stormwater Impacts	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A
	<p>Explain 'no' / 'N/A' answer: Development of an informational stormwater webpage on the Peace Bridge website was a Year 3 goal, but was not fully achieved. A stormwater informational page was developed for the Peace Bridge website; however, it was not finalized and available on-line until April 2006 (Year 4). Therefore, this is re-assigned to a Year 4 goal.</p>		
IV.C.2.	Public Involvement / Participation	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	<p>Explain 'no' / 'N/A' answer:</p>		
IV.C.3.	Illicit Discharge Detection and Elimination	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A
	<p>Explain 'no' / 'N/A' answer: The goal of erecting signage on Authority property prohibiting illicit discharges was not accomplished in Year 3. The Authority is currently evaluating whether or not this will be an effective BMP. Other mechanisms for prohibiting and preventing illicit discharges, including tenant leases, construction/bid documents, and storm drain stenciling, are being assessed. In Year 4 the Authority will decide on control mechanisms that will be used to prohibit and prevent illicit discharges and these mechanisms will be put in place by Year 5. Providing employee stormwater training was not accomplished in Year 3 and is moved to a goal for Years 4 and 5. The Authority's consultant started to prepare training materials (PowerPoint presentation, handouts) but they were not finalized in time to complete training in Year 3.</p>		
IV.C.4.	Construction Site Stormwater Runoff Control	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	<p>Explain 'no' / 'N/A' answer: There were no construction projects greater than or equal to one acre in scope in Year 3</p>		
IV.C.5.	Post-Construction Stormwater Management	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	<p>Explain 'no' / 'N/A' answer:</p>		
IV.C.6.	Pollution Prevention / Good Housekeeping for Municipal Operations	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A
	<p>Explain 'no' / 'N/A' answer: Providing employee stormwater training was not accomplished in Year 3 and is moved to a goal for Years 4 and 5. The Authority's consultant started to prepare training materials (PowerPoint presentation, handouts) but they were not finalized in time to complete training in Year 3.</p>		

Certification Statement

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

Print Name: Anthony D. Braunscheidel Title: Facilities Manager

Signature: _____ Date: _____

This form must be signed by either a principal executive officer or ranking elected official, or duly authorized representative of that person as described in Part VI.I.2. of the permit. See instructions for more information about who can sign this form.

Send two completed **hard copies** (an original and a photocopy) of this form, the Annual Report Table and any attachments to the DEC Central Office (MS4 Permit Coordinator, 625 Broadway, Division of Water - 4th Floor, Albany, NY 12233-3505). **DO NOT SUBMIT REPORTS IN THREE-RING BINDERS.**



**Phase II SPDES General Permit for Stormwater Discharges from Municipal Separate Storm Sewer Systems (MS4s), GP-02-02
STORMWATER MANAGEMENT PROGRAM ANNUAL REPORT (SWMPAR) TABLE**

Regulated MS4: BUFFALO AND FORT ERIE PUBLIC BRIDGE AUTHORITY **SPDES Permit Number:** NYR20A422

Annual Report Table for year ending: March 9, X 2006 (Year 3) 2007 (Year 4) 2008 (Year 5)

Information about how to complete the follow tables is in the instruction section. Please complete the tables electronically, if possible. Send two completed **hard copies** (an original and a photocopy) of this Annual Report Table, the MCC form and any attachments to the DEC Central Office (MS4 Permit Coordinator, 625 Broadway, Division of Water - 4th Floor, Albany, NY 12233-3505). **DO NOT SUBMIT REPORTS IN THREE-RING BINDERS.**

Minimum Control Measure 1. Public Education and Outreach

Use separate rows to explain the different processes, activities, procedures, practices, etc. used by the MS4. Add additional rows as needed.

<p>Permit Reference IV.C.1.a, b: Plan and conduct an ongoing public education and outreach program to ensure the reduction of all pollutants of concern in stormwater discharges to the maximum extent practicable (MEP).</p> <ul style="list-style-type: none"> • <i>Explain the program, including activities and materials used</i> • <i>Identify the personnel or outside organization conducting the activity.</i> • <i>Indicate activities planned for next year.</i> 	<p>Describe Measurable Goals and Results (when applicable) Indicate: Date Completed, Ongoing Task, or Scheduled Date (for next years activities)</p>
AUTHORITY PROGRAM AND ACCOMPLISHMENTS	
<p>The Authority’s Public Education and Outreach Program is documented in their SWMP developed in Year 2 and is comprised of five primary outreach techniques:</p> <ol style="list-style-type: none"> 1. Continued WNY Stormwater Coalition (WNYSC) Participation 2. Development and maintenance of a stormwater webpage 3. Distribution of printed material developed by the Coalition 4. Participation in Coalition organized events and programs 5. Displaying stormwater informational posters developed by the Coalition <p>Each program component is described in detail below. Additional activities completed in conjunction with the WNYSC in Year 3 are described in “Additional Techniques.”</p>	

Minimum Control Measure 1. Public Education and Outreach

Use separate rows to explain the different processes, activities, procedures, practices, etc. used by the MS4. Add additional rows as needed.

<p>CONTINUED WNYSC PARTICIPATION – As a cooperating MS4, the WNYSC will assist the Authority with their Public Education and Outreach program. The Authority’s consultant will continue to attend WNYSC meetings and participate in other WNYSC organized events in Year 4.</p>	<p>MEASURABLE GOAL – Participate in WNYSC (minimum two meetings/ year)</p> <p>YEAR 3 RESULTS – This goal was accomplished in Year 3. The Coalition held ten meetings during Year 3, with the exception of July and December. The Authority’s consultant attended the following meetings: 2005: April 13, May 11, August 10, October 12, November 9 2006: January 11, March 8.</p> <p>Attendance records are available upon request from Erie County DEP 858-7583 – Mary Rossi.</p> <p>SCHEDULE – On-going</p>
<p>WEBPAGE - An informational web page will be created on the Authority website devoted to stormwater issues relevant to the community. At a minimum, this web page will include a general description of the stormwater Phase II regulations; pollutants of concern and their sources; the purpose of stormwater management and how the public can become involved; scheduled community events; links to the Coalition internet site and brochures; Authority stormwater contact information; and the electronic versions of the Authority’s draft and final SWMPARs. The web page is intended to augment other media for disseminating stormwater-related information and materials to the public. The website will be jointly developed and maintained in Year 4 by the Authority’s consultant and IT personnel.</p>	<p>MEASURABLE GOAL – Create a stormwater information page on the Peace Bridge website</p> <p>YEAR 3 RESULTS – This goal was not fully accomplished in Year 3. The website text was developed in Year 3, but the site was not finalized before the Year 3 deadline.</p> <p>SCHEDULE – Post website under “Community” menu on www.peacebridge.com in Year 4 (April 2006). Maintain/update website on a monthly basis in Year 4, and on-going in subsequent years.</p>
<p>PRINTED MATERIAL - The Coalition has developed stormwater informational brochures and posters for stakeholders throughout Western New York. The Authority will make the brochures developed by the Coalition available at the Administration Building, as well as on the website. The Authority Facilities Manager and Administrative personnel are responsible for maintaining the brochures.</p>	<p>MEASURABLE GOAL – Make Erie County brochures available at the Administration Building</p> <p>YEAR 3 RESULTS – This goal was accomplished in Year 3.</p> <p>SCHEDULE – On-going</p>
<p>EVENTS AND PROGRAMS – The Authority’s consultant will assist in the public presentations organized by the Coalition as necessary in Year 4. The Authority will include notice of informational stormwater presentations by the Coalition on the stormwater website and encourage attendance at the bi-annual public meetings of the Coalition. In addition, Authority personnel will attend and participate in Construction Site Stormwater Runoff Control and Pollution Prevention/Good Housekeeping training activities sponsored by the Coalition when offered.</p>	<p>MEASURABLE GOAL – Participate in presentations to community groups (i.e. Presentations organized by Erie County Regional Stormwater Coalition)</p> <p>SCHEDULE – This was originally a Year 5 goal, but is moved to on-going, starting in Year 4. Intend to attend P2/Good Housekeeping training offered by WNYSC on April 13, 2006.</p>
<p>DISPLAYS - The Coalition has developed stormwater informational posters and displays. The Authority will display the posters developed by the Coalition in the Administration Building.</p>	<p>MEASURABLE GOAL – Display Erie County stormwater poster in Administration Building</p> <p>SCHEDULE – This is a Year 4 goal.</p>

Minimum Control Measure 1. Public Education and Outreach

Use separate rows to explain the different processes, activities, procedures, practices, etc. used by the MS4. Add additional rows as needed.

Additional Techniques (Completed in conjunction with the WNYSC)	Describe Measurable Goals and Results (when applicable) Indicate: Date Completed, Ongoing Task, or Scheduled Date (for next years activities)
<p>CLASSROOM EDUCATION/SCHOOL PROGRAM - The WNYSC’s Public Education and Outreach workgroup researched a variety of educational resources. The K-12 education packages that were developed in Year 3 include six Project WET activities, the Coalition’s Household Guide to Preventing Stormwater Pollution, Stormwater quiz cards and a flyer promoting stormwater P2 demonstrations using Enviroscope watershed model.</p>	
<p>MEDIA CAMPAIGN - In Year 4 the WNYSC’s Public Education and Outreach workgroup will prepare a public information press package for local news agencies. The press package will include the following:</p> <ul style="list-style-type: none"> • Information targeting stormwater pollution prevention for households. (video, audio, and printed public service announcements) • Opportunities for public participation at WNYSC meetings. • Invitation for public to review draft SWMP. • Invitation for public review of Annual Report. • Invitation for Community Cleanup Events. <p>Information in the press package will be generic relative to dates and times. Specific dates and times will be developed by each municipality and advertised accordingly.</p>	
<p>PUBLIC EDUCATION DISPLAY – The WNYSC developed a public education display for community outreach and education in Year 3 that includes:</p> <ul style="list-style-type: none"> • Stormwater pollution quiz/game • Prize wheel • Enviroscope where possible • Poster display 	<p>YEAR 3 DATES COMPLETED – The following outreach was conducted on behalf of the WNYSC members in Year 3:</p> <ul style="list-style-type: none"> • Niagara County Environmental Field Days (June 7-8, 2005) • Earth Day Celebrations: display at Erie County Hall (April 18-22, 2005); outreach at SUNY Buffalo (April 2005); Buffalo Zoo Earth Day Expo (August 14, 2005) • Daemen College Environmental Summit (October 1, 2005)
<p>OUTREACH TO COMMERCIAL ENTITIES – The WNYSC distributed brochures to restaurant and food service industries, automotive facilities, mobile cleaners in Year 3 (June 2005). WNYSC posted pdf brochures on WNYSC webpage.</p>	<p>YEAR 3 DATE COMPLETED – June 2005</p>
<p>EARTH DAY T-SHIRT CONTEST - The 2005 Earth Day T-shirt theme focused on stormwater P2 in Year 3. Over 2,000 entries from students in grades K-8 were received from schools throughout Erie and Niagara Counties. Student/teacher prizes were awarded at a press event; winning schools received trees.</p>	<p>YEAR 3 DATE COMPLETED – April 22, 2005</p>

Minimum Control Measure 1. Public Education and Outreach

Use separate rows to explain the different processes, activities, procedures, practices, etc. used by the MS4. Add additional rows as needed.

<p>STORMWATER MANAGEMENT SOFTWARE DEMONSTRATIONS – The WNYSC organized two stormwater management software demonstrations in Year 3.</p>	<p>YEAR 3 DATES COMPLETED ASIST April 5, 2005 CBI June 29, 2005</p>
<p>RAIN GARDEN DEMONSTRATION PROJECT - A Rain Garden Demonstration Project was funded by NYS Soil & Water Conservation Committee (through ECDEP participation in the Erie County Water Quality Committee) and will be undertaken in Year 4. Three MS4s (Village of Hamburg, Town of West Seneca, Town of Tonawanda) will host the demonstration rain gardens where public education materials will be available.</p>	
<p>Explain any changes or additions to the Permit Referenced Activities / Techniques, Measurable Goals and / or Scheduled Dates above and provide a reason(s) for the change:</p> <p>Creating a stormwater information page on the Peace Bridge website was not fully accomplished in Year 3 and is moved to a Year 4 goal. The effort required to organize information and create the website was more than anticipated, and the web page was not finalized and available on-line until April 2006.</p>	

Minimum Control Measure 2. Public Involvement/Participation

Use separate rows to explain the different processes, activities, procedures, practices, etc. used by the MS4. Add additional rows as needed.

<p>Permit Reference IV.C.2.c.iii.: Design and conduct a public involvement / participation program.</p> <ul style="list-style-type: none"> • Describe activities that the MS4 has/will undertake to provide program access to interested individuals and to gather needed input. • Indicate activities planned for next year. 	<p>Describe Measurable Goals and Results (when applicable) Indicate: Date Completed, Ongoing Task, or Scheduled Date (for next years activities)</p>
<p>AUTHORITY PROGRAM AND ACCOMPLISHMENTS</p>	
<p>The Authority’s Public Involvement and Participation Program is documented in their SWMP developed in Year 2. The program defines the documents that will be made available to the public and how this will be accomplished, the Authority’s target audience, public notice venues and content, the draft annual report review process, and additional targeted public involvement/participation opportunities.</p> <p>Components of the Authority’s program are described below. As a cooperating MS4, the WNYSC will assist the Authority with their Public Involvement and Participation Program. Additional activities completed in conjunction with the WNYSC in Year 3 are described in “Additional Techniques.”</p>	
<p>PUBLIC ACCESS TO DOCUMENTS AND INFORMATION - The Authority will make the following documents available to the public: Notice of Intent, draft and final Annual Reports, SWMP summary, stormwater informational brochures and displays. These are available both at the Administration Building and through the stormwater page on the Authority’s website (www.peacebridge.com). The Authority Facilities Manager and Administrative personnel maintain hard copy documents while the Authority’s consultant and IT personnel maintain documents on the website (starting in Year 4).</p>	<p>MEASURABLE GOAL – Make Stormwater Management Program (SWMP) available to the public</p> <p>YEAR 3 RESULTS – This goal was accomplished in Year 3. Hard copies of the SWMP were available on request from the Stormwater Contact and at the Administration Building.</p> <p>SCHEDULE – On-going. In Year 4 documents will be available electronically through the Authority’s website (April 2006).</p>
<p>PUBLIC NOTICE VENUES – Public notice information will be distributed utilizing a minimum of one of the following venues:</p> <ol style="list-style-type: none"> 1. Notice will be sent to Authority personnel, tenants, and interest groups through e-mail distribution lists. 2. Public notice information will be posted on stormwater page of the Authority’s website. 3. A public notice will be run in the local newspaper. 	

Minimum Control Measure 2. Public Involvement/Participation

Use separate rows to explain the different processes, activities, procedures, practices, etc. used by the MS4. Add additional rows as needed.

<p>WNYSC MEETINGS - The WNYSC opens its meetings to the public two times per year, in October and April, to enhance public access to information and encourage involvement. The meeting consists of a brief overview of the stormwater regulations and how the public can be involved. The public in attendance are invited to participate in any of the Coalition’s workgroups. The draft Annual report, public education materials and other information are provided.</p>	<p>MEASURABLE GOAL – Open WNYSC meetings to the public (2 meetings/year) YEAR 3 DATES COMPLETED – April 13, 2005 and October 12, 2005 YEAR 4 SCHEDULE – April 12, 2006 and October 11, 2006</p>
<p>PUBLIC INVOLVEMENT/PARTICIPATION OPPORTUNITIES – The Authority will promote, via the public notice venues, Coalition-sponsored public involvement opportunities. These may include WNYSC meetings and regional environmental events such as County-sponsored Household Hazardous Waste Drop Off Days, County-sponsored Electronics Recycling Days, Earth Day events and beach cleanups. This will be an on-going activity that will be started in Year 4.</p>	<p>Refer to “Additional Techniques” for Year 3 WNYSC-sponsored public involvement opportunities. NEW MEASURABLE GOAL – Post WNYSC-sponsored public involvement opportunities on the Authority’s stormwater website. SCHEDULE – On-going (starting in Year 4)</p>
<p>PUBLIC PRESENTATION AND COMMENTS RECEIVED ON SWMP AND ANNUAL REPORT</p> <ul style="list-style-type: none"> • The draft Year 3 Annual Report was available to the public attending the open WNYSC meeting in April 12, 2006. • Hard copies of the draft Year 3 Annual Report were available at the Administration Building and on request from the Stormwater Contact. • Additional opportunities for public review of the Annual report were at six public libraries (four in Erie County; two in Niagara County) where Erie County staff was present in to receive public comment on the draft Annual Report. • Similar activities will be conducted in Year 4. The draft Year 4 annual report will also be posted on the Authority’s website for review. 	<p>MEASURABLE GOAL – Make SWMP Annual Report available to the public YEAR 3 RESULTS – This goal was accomplished in Year 3. Hard copies of the SWMP were available at the Administration Building and on request from the Stormwater Contact. See below for additional detail. SCHEDULE – On-going (see below for anticipated dates)</p>
<p>Permit Reference IV.C.2.a, f: Develop procedures to provide public notice about and access to documents and information in a manner that complies with state and local public notice requirements. <i>Describe procedures below and state the methods used to publicize the AR public presentation.</i></p>	
<p>Public notices for the library events and WNYSC meeting were published in local newspapers by the WNYSC and listed on the Authority’s stormwater website in May 2006. Availability of the Draft Year 3 Annual report for review from the Administration Building and Stormwater contact was also promoted on the Authority’s stormwater website.</p>	
<p>Permit Reference IV.C.2.e: Public presentation of; f: summary of comments received on; and g: intended response to comments on the SWMPAR.</p>	
<p>Summarize attendance at the public presentation of the Annual Report. Include number of attendees and who was represented:</p>	
<p>WNYSC meeting and library attendance information is available from Erie County DEP 858-7583 – Mary Rossi. The comments received at these meetings and intended responses are attached. The Authority’s Stormwater Contact did not receive any comments on the Draft Year 3 Annual Report.</p>	

Minimum Control Measure 2. Public Involvement/Participation

Use separate rows to explain the different processes, activities, procedures, practices, etc. used by the MS4. Add additional rows as needed.

<p>Comments on Annual Report Meeting <input type="checkbox"/> No public comments received on Annual Report. <input checked="" type="checkbox"/> Comments received. Attach summary of comments and intended responses.</p>	<p>Date of Annual Report Meeting: April 12, 2006 (WNYSC meeting) April 21, 2006 (1 library) April 29, 2006 (2 libraries) May 3, 2006 (1 library) May 6, 2006 (2 libraries)</p>	<p>Approximate Date of Meeting Next Year: April/May 2007</p>
<p>Additional Techniques (Completed in conjunction with the WNYSC)</p>	<p>Describe Measurable Goals and Results (when applicable) Indicate: Date Completed, Ongoing Task, or Scheduled Date (for next years activities)</p>	
<p>OUTREACH TO LOCAL WATERSHED ORGANIZATIONS - A representative from Buffalo Niagara Riverkeepers is an active member of the WNYSC. The Riverkeepers coordinate cleanup activities twice per year in both Erie and Niagara Counties. The Riverkeepers organization also assists with stormwater outreach and education efforts by including WNYSC educational materials in their many community initiatives. In addition, The Riverkeepers Riverwatch program, a volunteer water monitoring program, supports stormwater pollution prevention by including it in their education curriculum for Riverwatch volunteers.</p>		
<p>STREAM, BEACH, ROADWAY CLEANUPS - The WNYSC is working in cooperation with the Buffalo Niagara Riverkeepers, a local watershed organization, on spring and fall cleanup events such as the Beach Sweep U.S.A. (Fall), Great American Cleanup (March-May); Spring Shoreline Sweep (April).</p>	<p>YEAR 3 DATES COMPLETED: April 22-24, 2005 and September 16-17, 2005 YEAR 4 SCHEDULED DATES: April 21-23, 2006 and September 2006</p>	
<p>HOUSEHOLD HAZARDOUS WASTE COLLECTIONS - Erie County held three household hazardous waste collections in 2005 (2,062 households participated). Niagara County held two household hazardous waste collections in 2005 (710 households participated).</p>	<p>YEAR 3 DATES COMPLETED: Erie County - May 7, 2005; June 18, 2005; September 10, 2005 Niagara County – May 14, 2005; August 27, 2005 YEAR 4 SCHEDULED DATES: Erie County - May 13, 2006; June 17, 2006; September 9, 2006 Niagara County – Spring/Summer 2006</p>	
<p>Explain any changes or additions to the Permit Referenced Activities / Techniques, Measurable Goals and / or Scheduled Dates above and provide a reason(s) for the change: The Authority has added a <u>new</u> measurable goal for Year 4: Post WNYSC-sponsored public involvement opportunities on the Authority’s stormwater website. The stormwater website is an excellent means of disseminating information on public/involvement and participation opportunities.</p>		

Minimum Control Measure 3. Illicit Discharge Detection and Elimination (IDDE)

Use separate rows to explain the different processes, activities, procedures, practices, etc. used by the MS4. Add additional rows as needed.

<p>Permit Reference IV.C.3.a: Develop, implement and enforce a program to detect, identify and eliminate illicit discharges, including illegal dumping, into the MS4.</p> <ul style="list-style-type: none"> • <i>Explain the activities and procedures used to meet this requirement this year and planned for next year.</i> • <i>Revise as procedures are updated.</i> • <i>Identify personnel or outside organization conducting the activities</i> 	<p>Describe Measurable Goals and Results (when applicable) Indicate: Date Completed, Ongoing Task, or Scheduled Date (for next years activities)</p> <ul style="list-style-type: none"> • <i>Example measurable goals: number of illicit discharges detected; number of illicit discharges eliminated.</i>
AUTHORITY PROGRAM AND ACCOMPLISHMENTS	
<p>STORMWATER MANAGEMENT PROGRAM - In Year 2 the Authority developed a written SWMP that outlines a process for identifying existing illicit discharges and states that illicit discharges are prohibited on Authority property. A copy of the Authority’s SWMP is available upon request (Anthony Braunscheidel: 716-884-6744 ext. 242). The Authority’s written SWMP will be reviewed and updated by the Authority’s consultant on an annual basis. Information developed as part of the WNYSC SWMP will be incorporated in the Authority’s SWMP, where applicable.</p>	<p>NEW MEASURABLE GOAL – Review and update SWMP annually. YEAR 3 RESULTS – This goal was accomplished in Year 3. The Authority’s SWMP was updated and revisions were issued in June 2005. SCHEDULE – On-going. Anticipated Year 4 revision date is June 2006.</p>
<p>In addition, the Authority will continue to investigate mechanisms to prohibit and prevent illicit discharges in Year 4.</p>	<p>MEASURABLE GOAL – Erect signage on Authority property prohibiting illicit discharges YEAR 3 RESULTS – This goal was not accomplished in Year 3. The Authority is currently evaluating whether or not this will be an effective BMP. Other mechanisms for prohibiting and preventing illicit discharges, including tenant leases, construction/bid documents, and storm drain stenciling, are being assessed. SCHEDULE – Decide on control mechanisms that will be used to prohibit and prevent illicit discharges in Year 4. Mechanisms in place by Year 5.</p>
<p>Permit Reference IV.C.3.b: Develop and maintain a map showing the location of all outfalls and the names and location of all waters of the US that receive discharges from outfalls. <i>Explain activities performed this year and planned for next year, including work on the following IDDE guidance prerequisites:</i></p> <ul style="list-style-type: none"> • field verification of outfall locations; • mapping all inter-municipal subsurface conveyances; • delineating storm sewershed; and • developing and retaining MS4 mapping as needed to find the source and identify illicit discharges. <i>State if maps are in GIS.</i> 	<p>Describe Measurable Goals and Results (when applicable) Indicate: Date Completed, Ongoing Task, or Scheduled Date (for next years activities)</p> <ul style="list-style-type: none"> • <i>Example measurable goals: percent of outfalls mapped</i>

Minimum Control Measure 3. Illicit Discharge Detection and Elimination (IDDE)

Use separate rows to explain the different processes, activities, procedures, practices, etc. used by the MS4. Add additional rows as needed.

<p>STORMWATER CONVEYANCE SYSTEM INSPECTION AND MAPPING UPDATES – The Authority will complete a field walk-through and visually inspect the stormwater conveyance system on an annual basis. Information gathered during the walk-through will be used to update base mapping. Inspections will be completed by a 2-3 person team comprised of Authority personnel and the Authority’s consultant.</p> <p>In Year 4, a comprehensive inspection of each conveyance system facility (i.e., outfall, catch basin) will be completed to confirm system mapping and document the existing condition of each facility. This information will be used to prioritize cleaning and maintenance efforts.</p>	<p>MEASURABLE GOAL – Update collection system and outfalls map</p> <p>YEAR 3 RESULTS – This goal was accomplished in Year 3. Existing system map was updated in June 2005. The Authority has 5 outfalls, all of which are inter-municipal subsurface conveyances, and 100% of these have been mapped in Microstation. The Authority has 2 storm sewersheds which have also been delineated on the mapping.</p> <p>SCHEDULE – On-going. Year 4 comprehensive system inspection will be completed in April 2006. Existing system map will be updated in June 2006.</p>
<p>ILLICIT CONNECTION IDENTIFICATION AND DYE TESTING – In Year 4, dye testing will be utilized to confirm the configuration of the Authority’s stormwater collection system and identify illicit connections on Authority property. Specifically, dye testing will be used to determine the connection point of building floor drains and any suspect facilities identified during the comprehensive field walk-through.</p> <p>In subsequent years, illicit connections will be identified through the annual visual inspection of facilities and dye testing will be performed on an “as needed” basis.</p>	<p>MEASURABLE GOAL – Identify illicit connections</p> <p>SCHEDULE – On-going. Year 4 system inspection and dye testing will be conducted in April 2006 to identify illicit connections.</p> <p>MEASURABLE GOAL – Dye testing of storm sewer system</p> <p>SCHEDULE – Year 4 system inspection and dye testing will be conducted in April 2006 to identify illicit connections.</p>

Minimum Control Measure 3. Illicit Discharge Detection and Elimination (IDDE) Regulatory Mechanism

<p>Permit Reference IV.C.3.c: Prohibit, through an ordinance, local law or other regulatory mechanism, illicit discharges into the MS4. The MS4s have until year 5 to complete the local law work. See the instructions for information about completing this section.</p>	
<p>Does the MS4 have the legal authority to enact ordinances, local laws or other regulatory mechanisms?</p>	<p><input checked="" type="checkbox"/> No (go to ADDENDUM 1) <input type="checkbox"/> Yes (complete questions below)</p>
<p>Assessment of Regulatory Mechanism (Local Code)</p>	
<p>1) When was this assessment completed or planned to be completed?</p>	<p>Date completed: _____ <input type="checkbox"/> Not yet completed (proceed to next table) Plan to complete for reporting in year: <input checked="" type="checkbox"/> 4; <input type="checkbox"/> 5.</p>
<p>2) Is there an existing ordinance, local law or other regulatory mechanism?</p>	<p><input type="checkbox"/> No (go to question 5) <input type="checkbox"/> Yes</p>
<p>3) Does the existing regulatory mechanism prohibit illicit discharges as required by the MS4 Permit?</p>	<p><input type="checkbox"/> No (amendments needed) <input type="checkbox"/> Yes</p>
<p>4) Does the existing regulatory mechanism include enforcement authorities and procedures as required by the MS4 Permit?</p>	<p><input type="checkbox"/> No (amendments needed) <input type="checkbox"/> Yes</p>
<p>Development of Regulatory Mechanism (Local Codes)</p>	
<p>5) When was this work completed or planned to be completed?</p>	<p>Date completed: _____ <input type="checkbox"/> Not yet completed (proceed to next table) Plan to complete work below for reporting in year: <input type="checkbox"/> 4; <input type="checkbox"/> 5.</p>
<p>6) If you answered 'No' to question 1, 2 or 3, what regulatory mechanism or amendments will be adopted to meet the MS4 permit requirements?</p>	<p><input type="checkbox"/> NYS IDDE Model Law in its entirety <input type="checkbox"/> Selected NYS IDDE Model Law articles adopted as amendments to existing code(s) that are equivalent to the NYS IDDE Model Law <input type="checkbox"/> MS4 will write language equivalent to NYS IDDE Model Law</p>
<p>7) If you answered 'No' to question 1, 2 or 3, has a list of needed changes to local codes been developed for adoption of the regulatory mechanism?</p>	<p><input type="checkbox"/> No <input type="checkbox"/> Yes, list the local code(s) that will be changed:</p>
<p>8) If the existing regulatory mechanism does not require amendments, what language is in the mechanism?</p>	<p><input type="checkbox"/> NYS IDDE Model Law in its entirety <input type="checkbox"/> Selected NYS IDDE Model Law articles adopted as amendments to existing code(s) that are equivalent to the NYS IDDE Model Law <input type="checkbox"/> Language equivalent to NYS IDDE Model Law</p>
<p>9) What was the date or is the planned date of local law adoption?</p>	<p>Date:</p>
<p>10) Provide a web address if adopted local law can be found on a web site.</p>	<p>Web Address:</p>

Minimum Control Measure 3. Illicit Discharge Detection and Elimination (IDDE)

Use separate rows to explain the different processes, activities, procedures, practices, etc. used by the MS4. Add additional rows as needed.

<p>Permit Reference IV.C.3.e: Inform public employees, businesses and the general public of hazards associated with illegal discharges and improper disposal of waste.</p> <ul style="list-style-type: none"> • <i>Explain activities and materials used to meet this requirement this year and planned for next year</i> • <i>Identify personnel or outside organization conducting activities</i> 	<p>Describe Measurable Goals and Results (when applicable) Indicate: Date Completed, Ongoing Task, or Scheduled Date (for next years activities)</p>
<p>EMPLOYEE STORMWATER TRAINING - The Authority will organize and conduct training sessions for Authority employees on stormwater management. Topics will include, at a minimum, an overview of stormwater and the SPDES permit requirements; the potential impacts of illicit connections and discharges on stormwater and how they can be detected and eliminated; best management practices for stormwater management; review of the Authority’s Stormwater Management Program and standard operating procedures.</p> <p>Training materials will be developed by the Authority’s stormwater consultant in Years 3 and 4. Training will be conducted by Authority’s health and safety coordinator every two years and as necessary to update employees on major changes to the SWMP.</p>	<p>MEASURABLE GOAL – Conduct informational stormwater workshop with Authority employees</p> <p>YEAR 3 RESULTS – This goal was not accomplished in Year 3. The Authority’s consultant started developing training materials (PowerPoint presentation, handouts) but they were not complete in Year 3.</p> <p>SCHEDULE – Development of training materials will be completed in Year 4. Initial training will be conducted in Years 4 and 5, and every two years thereafter.</p>
<p>Additional Techniques (Completed in conjunction with the WNYSC)</p>	<p>Describe Measurable Goals and Results (when applicable) Indicate: Date Completed, Ongoing Task, or Scheduled Date (for next years activities)</p>
<p>WNYSC GIS OUTFALL MAPPING – Due to the unanticipated large number of outfalls (5000) discovered through the Contracted Mapping effort for the WNYSC Members, the contractor was unable to complete GIS mapping and visual inspection of all the outfalls during the Year 3 reporting period. Approximately 80% of the outfalls are mapped. It is anticipated that the remaining outfalls will be mapped by September 2006.</p> <p>The outfall mapping data is being incorporated into a GIS data base which all of the member MS4s will be able to utilize within their own computer systems or access from the Erie County web site. This database of information as well as the map will be used to help implement the IDDE programs, track potential discharges and set goals for the IDDE program. The Coalition members will establish procedures for updating this database and adding new outfalls through the Erie County GIS staff.</p>	<p>YEAR 3 RESULTS – The Authority’s outfalls were not mapped in GIS in Year 3; however 80% of WNYSC member’s outfalls are mapped.</p> <p>YEAR 4 SCHEDULE - The Authority’s outfalls will be mapped in GIS in April 2006. The anticipated completion date for the WNYSC project is September 2006.</p>
<p>IDDE PROGRAM PROCEDURES AND PROTOCOLS - A draft Illicit Discharge Program protocol has been developed for incorporation into the Western New York Stormwater Management Plan. This protocol will be evaluated and embellished through a pilot IDDE grant project Erie County and Buffalo State College will initiate this Spring 2006 which Coalition members will participate in.</p>	
<p>ILLCIT DISCHARGE PUBLIC OUTREACH - Industry specific brochures have been</p>	

Minimum Control Measure 3. Illicit Discharge Detection and Elimination (IDDE)

Use separate rows to explain the different processes, activities, procedures, practices, etc. used by the MS4. Add additional rows as needed.

<p>developed for nine targeted industry and business groups informing them of how they can prevent stormwater pollution. These brochures are available on the Peace Bridge and Erie County websites, and printed copies are available at the Administration Building. Direct mailing to both the construction related businesses and to the registered pesticides applicators in Erie and Niagara Counties has been completed. If necessary the Coalition will develop additional industry specific brochure(s) should any new targeted priority business groups emerge from the prioritization process.</p>	
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Explain any changes or additions to the Permit Referenced Activities / Techniques, Measurable Goals and / or Scheduled Dates above and provide a reason(s) for the change:

The Authority has added a new measurable goal for Year 4: Review and update SWMP annually.

The goal of erecting signage on Authority property prohibiting illicit discharges was not accomplished in Year 3. The Authority is currently evaluating whether or not this will be an effective BMP. Other mechanisms for prohibiting and preventing illicit discharges, including tenant leases, construction/bid documents, and storm drain stenciling, are being assessed. In Year 4 the Authority will decide on control mechanisms that will be used to prohibit and prevent illicit discharges and these mechanisms will be put in place by Year 5.

Providing employee stormwater training was not accomplished in Year 3 and is moved to a goal for Years 4 and 5. The Authority's consultant started to prepare training materials (PowerPoint presentation, handouts) but they were not finalized in time to complete training in Year 3.

Minimum Control Measure 4 and 5. Construction Site and Post-Construction Stormwater Runoff Control Regulatory Mechanism

Permit Reference IV.C.4.b.i, 5.a.i: Require development and implementation of erosion and sedimentation controls through a local law or other regulatory mechanism. Report on assessment process used (*Stormwater Management Gap Analysis Workbook for Local Officials* or equivalent process). The MS4s have until year 5 to complete the local law work. **See the instructions for information about completing this section.**

Does the MS4 have the legal authority to enact land use ordinances, local laws or other regulatory mechanisms?	<input checked="" type="checkbox"/> No (go to ADDENDUM 2) Non-traditional MS4s <input type="checkbox"/> Yes (complete questions below) Traditional MS4s
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Preliminary Assessment of Regulatory Mechanism (Local Code)

1. When was the preliminary assessment of existing local codes completed or when will it be completed?	Date completed: _____ Not yet completed (proceed to next table) Plan to complete for reporting in year: ___4; ___5. <input type="checkbox"/> Did not do preliminary assessment; proceeded directly to Gap Analysis Worksheets 1-4 or adopted <i>Sample Local Law for Stormwater Management and Erosion & Sediment Control</i> (Sample Local Law).
2. If preliminary assessment was completed, indicate the results.	<input type="checkbox"/> If none of Sample Local Law provisions appear in local code; consider adopting Sample Local Law or equivalent <input type="checkbox"/> If few Sample Local Law provisions appear in local code; major revisions needed or consider adopting Sample Local Law or equivalent <input type="checkbox"/> If most of the Sample Local Law provisions appear in local code; minor revisions needed

Assessment and Development of Regulatory Mechanism (Local Code) (continued on next page)

3. When was the Gap Analysis or equivalent process completed or when will it be completed?	Date completed: _____ Not yet completed (proceed to next table) Plan to complete work below for reporting in year: ___4; ___5.
4. How was the local code adopted or how will it be adopted*? <i>*If MS4 has some existing local code equivalent to the Sample Local Law and adopted parts of the Sample Local Law as amendments to make a complete local code, check b and c.</i>	a. <input type="checkbox"/> The entire Sample Local Law adopted as amendments to existing code or as stand alone law. <ul style="list-style-type: none"> • If no portions of the Sample Local Law were moved or deleted, all provisions would be exactly the same as the Sample Local Law. • If ANY provisions of the Sample Local Law were moved or deleted, the moved or changed provisions must be reviewed (use the <i>Gap Analysis</i> or equivalent process) to ensure the intent of the law has not been changed. b. <input type="checkbox"/> Parts of NYS Sample Local Law adopted as amendments to existing code. c. <input type="checkbox"/> Language developed by municipality was demonstrated to be equivalent.

Minimum Control Measure 4 and 5. Construction Site and Post-Construction Stormwater Runoff Control Regulatory Mechanism

Permit Reference IV.C.4.b.i, 5.a.i (continued)

Assessment and Development of Regulatory Mechanism (Local Code) (continued)

5. Answer the following questions about the Gap Analysis or equivalent processes.

Clauses are defined as: All the Sample Local Law sections or subsections in the Gap Analysis Worksheets 1-4 that have a box in the “Equivalence” column, meaning that there is an associated “Equivalence” sheet (with the exception of Article 6, Section 4 which does not have an Equivalence sheet).

Total number of clauses in each worksheet: Sample Local Law Article 1 (Gap Analysis Worksheet 1) - 8 clauses; Sample Local Law Article 2 (Gap Analysis Worksheet 2) - 51 clauses; Sample Local Law Article 3, 4, 5 (Gap Analysis Worksheet 3) - 3 clauses; Sample Local Law Article 6 (Gap Analysis Worksheet 4) - 9 clauses.

MS4s that adopt the entire Sample Local Law as amendments to existing code or as stand alone law need to indicate the number of clauses being adopted that are exactly the same as the Sample Local Law, or equivalent, in the right-hand column below.

Sample Local Law Articles	NUMBER OF REQUIRED CLAUSES IN LOCAL LAW		
	Existing clauses exactly the same as the Sample Local Law language	Existing clauses equivalent to the Sample Local Law language (see Gap Analysis Workbook Equivalence Sheets for information to help determine equivalence)	Sample Local Law or equivalent language to be adopted , listed as legislative agenda items.
1			
2			
3, 4, 5			
6			
TOTAL			

6. Has a list of needed changes (legislative agenda) been developed for adoption of amendments to local codes (or for deletion of existing codes that are addressed by adoption of a stand alone law)?

No
 Yes, list the **local codes** that will be changed:

7. What was the date or is planned date of local code adoption? Date:

8. Provide a web address if the adopted local law can be found on a web site. Web Address:

Minimum Control Measure 4. Construction Site Stormwater Runoff Control

Use separate rows to explain the different processes, activities, procedures, practices, etc. used by the MS4. Add additional rows as needed.

<p>Permit Reference IV.C.4.b. v: Develop and implement procedures for site plan review by the MS4 that incorporate consideration of potential water quality impacts and review individual pre-construction site plans to ensure consistency with local sediment and erosion control requirements.</p> <ul style="list-style-type: none"> Describe the procedures below. <u>Revise as procedures are updated.</u> 	<p>Describe Measurable Goals and Results (when applicable) Indicate: Date Completed, Ongoing Task, or Scheduled Date (for next years activities)</p> <ul style="list-style-type: none"> Example measurable goals: number of plans received; number of plans reviewed; percent of plans received that are reviewed.
<p>AUTHORITY PROGRAM AND ACCOMPLISHMENTS</p>	
<p>In Year 2 the Authority developed a written SWMP that defines their construction site stormwater runoff control program, BMPs and maintenance practices for BMPs. The construction site stormwater runoff control program outlines erosion and sediment control requirements and procedures for construction site plan review, public comment on construction plans, construction site waste management, site inspections, enforcement, and education and training of construction site operators. A copy of the Authority’s SWMP is available upon request (Anthony Braunscheidel: 716-884-6744 ext. 242).</p> <p>The Authority’s written SWMP will be reviewed and updated on an annual basis. Information developed as part of the Coalition SWMP, including BMP maintenance standards, will be incorporated in the Authority’s SWMP where applicable.</p> <p>Components of the Authority’s program are described below. Additional activities completed in conjunction with the WNYSC in Year 3 are described in “Additional Techniques.”</p>	<p>MEASURABLE GOAL – Update BMPs and incorporate into the SWMP YEAR 3 RESULTS – This goal was accomplished in Year 3. The Authority’s SWMP was updated and revisions were issued in June 2005. SCHEDULE – On-going. Anticipated Year 4 revision date is June 2006.</p>
<p>CONSTRUCTION SITE PLAN REVIEW PROCEDURES - The Authority is a private, non-traditional MS4 operator, and, as a result, has full control over all construction projects on its property. Bid documents and design drawings for any work completed on Authority property will be developed under the Authority’s direction by consultants under contract with the Authority. As part of the design phase of each project, the Facilities Manager or Authority’s consultant will review the SWPPP and design drawings in detail and provide feedback on stormwater-related issues, such as potential water quality impacts and consistency with Authority sediment and erosion control requirements.</p>	<p>MEASURABLE GOAL – Develop construction site plan review checklist YEAR 3 RESULTS – The WNYSC Draft SWMP includes a checklist to assist reviewers with verifying construction plan compliance with design requirements and stormwater regulations. SCHEDULE – Review WNYSC checklist in Year 4 and incorporate additional Authority requirements. Include copy of checklist in Authority’s SWMP during Year 4 revision.</p>

Minimum Control Measure 4. Construction Site Stormwater Runoff Control

Use separate rows to explain the different processes, activities, procedures, practices, etc. used by the MS4. Add additional rows as needed.

<p>EROSION AND SEDIMENT CONTROL REQUIREMENTS – The Authority requires that proper erosion and sediment control practices are implemented on all construction projects on Authority property greater than or equal to one acre in size. All erosion and sediment controls shall be designed in accordance with the New York State Standards and Specifications for Erosion and Sediment Control, and stamped by a licensed New York State Professional Engineer. The Authority will include this requirement in specifications for each construction project. If erosion and sediment controls for a project have been specified but not designed by the project engineer, control methods must be designed and stamped by a licensed New York State Professional Engineer and submitted to the project engineer for approval. Work may not commence until the contractor receives written approval from the project engineer that the controls are acceptable as designed. Construction site operators are required to implement erosion and sediment control management practices as designed or specified and approved by the project engineer at all times throughout the construction duration.</p>	<p>YEAR 3 RESULTS – There were no construction projects greater than or equal to one acre in scope in Year 3.</p> <p>SCHEDULE – On-going. Bid document language is being developed in Year 4 (refer to Addendums).</p>
<p>Permit Reference IV.C.4.b. vi: Develop and implement procedures for the receipt and consideration of information submitted by the public.</p> <ul style="list-style-type: none"> • <i>Explain the procedures below. <u>Revise as procedures are updated.</u></i> • <i>Identify the responsible personnel or outside organizations.</i> 	<p>Describe Measurable Goals and Results (when applicable) Indicate: Date Completed, Ongoing Task, or Scheduled Date (for next years activities)</p>
<p>PUBLIC COMMENT ON CONSTRUCTION PLANS – The Authority will provide an opportunity for public comment on construction projects greater than or equal to one acre in scope, and will comply with State and local public notice requirements when advertising in the public notice venues described in Minimum Control Measure 2. Comments received will be documented and given consideration in finalizing the construction plans.</p>	<p>YEAR 3 RESULTS – There were no construction projects greater than or equal to one acre in scope in Year 3.</p>
<p>Permit Reference IV.C.4.b. iii, vii: Develop and implement procedures for site inspections, enforcement of control measures and sanctions to ensure compliance with GP-02-02.</p> <ul style="list-style-type: none"> • <i>Describe each procedure below. <u>Revise as procedures are updated.</u></i> 	<p>Describe Measurable Goals and Results (when applicable) Indicate: Date Completed, Ongoing Task, or Scheduled Date (for next years activities)</p> <ul style="list-style-type: none"> • <i>Example measurable goals are number of: inspections; fines assessed; stop work orders; other sanctions.</i>

Minimum Control Measure 4. Construction Site Stormwater Runoff Control

Use separate rows to explain the different processes, activities, procedures, practices, etc. used by the MS4. Add additional rows as needed.

<p>SITE INSPECTIONS – The Authority will contract with an independent consultant to provide construction oversight and inspection on all projects greater than one acre. The consultant will be responsible for ensuring all erosion and sediment controls are installed as designed or approved by the project engineer. Authority maintenance personnel will also periodically conduct site a walk-through to verify stormwater controls are in place and operating as designed.</p>	<p>MEASURABLE GOAL – Develop site inspection checklist YEAR 3 RESULTS – Sample inspection forms have been included in the WNYSC Draft SWMP. The sample inspection forms were completed in Year 3. SCHEDULE – Review WNYSC checklist in Year 4 and incorporate additional Authority requirements. Include copy of checklist in Authority’s SWMP during Year 4 revision.</p> <p>MEASURABLE GOAL – Inspect sites for compliance with regulatory mechanism and BMPs. YEAR 3 RESULTS – There were no construction projects greater than or equal to one acre in scope in Year 3. SCHEDULE – On-going.</p>
<p>ENFORCEMENT – Enforcement requirements will be determined on a project-by-project basis, and penalties for non-compliance with the Authority’s stormwater construction site stormwater runoff control program will be documented in the project specifications.</p>	<p>MEASURABLE GOAL – Issue stormwater requirements to construction site operators during bidding process YEAR 3 RESULTS – There were no construction projects greater than or equal to one acre in scope in Year 3. SCHEDULE – On-going. Bid document language is being developed in Year 4 (refer to Addendums).</p>
<p>Permit Reference IV.C.4.b. viii: Educate and train construction site operators about requirements to develop and implement a SWPPP and any other requirements they must meet within the MS4s jurisdiction.</p> <ul style="list-style-type: none"> • <i>Explain the activities and materials used to meet this requirement.</i> • <i>Identify the personnel or outside organization conducting this activity.</i> • <i>Indicate activities planned for next year.</i> 	<p>Describe Measurable Goals and Results (when applicable) Indicate: Date Completed, Ongoing Task, or Scheduled Date (for next years activities)</p>
<p>EROSION & SEDIMENT CONTROL WORKSHOP FOR CONTRACTORS - Agenda focused on topics related to stormwater permit compliance including contractor certifications, site inspections, developer responsibilities, reporting requirements, erosion and sediment control practices and installation of erosion controls. All attendees received Erosion & Sediment Control Field Notebooks. Don Lake and Paula Smith, NYSDEC, the WNYSC and Erie County Soil & Water Conservation District conducted the activity.</p>	<p>YEAR 3 DATE COMPLETED - March 15, 2005</p>

Minimum Control Measure 4. Construction Site Stormwater Runoff Control

Use separate rows to explain the different processes, activities, procedures, practices, etc. used by the MS4. Add additional rows as needed.

<p>WNYSC CONSTRUCTION SITE INSPECTION TRAINING PROGRAM - To provide MS4s with “hands on” field assessments, training sessions for Code Enforcer / Highway Department / Town Engineer / Building Department staff was developed. The training consists of a morning classroom session followed by a field assessment at a local construction site in the afternoon. The agenda includes: Introduction to Phase II Stormwater Regulations; NYSDEC Phase II Construction Regulations; Inspection Protocol (classroom); Review of site plan for the field assessment; Inspection Protocol (field); Construction site observations; NOI & SWPP inspection; Weekly inspection reports review; and, Inspection of the site. The first of 30 trainings was conducted on October 14, 2005. WNYSC is coordinating this training.</p>	<p>SCHEDULE – Authority personnel will attend this training if offered locally during Year 4.</p>
<p>Additional Techniques (Completed in conjunction with the WNYSC)</p>	<p>Describe Measurable Goals and Results (when applicable) Indicate: Date Completed, Ongoing Task, or Scheduled Date (for next years activities)</p>
<p>MS4 ELECTED OFFICIALS PRESENTATION - The WNYSC is working with Paula Smith from NYSDEC to develop a 10-minute presentation to educate elected officials on the Phase 2 Stormwater Regulations.</p>	
<p>TRAINING FOR CONTRACTORS AND DESIGN PROFESSIONALS - The WNYSC is working with NYSDEC and Soil and Water Conservation District to develop a 4-hour training session for contractors and design professionals. Training to be coordinated with local Builders Association.</p>	
<p>Explain any changes or additions to the Permit Referenced Activities / Techniques, Measurable Goals and / or Scheduled Dates above and provide a reason(s) for the change: Additional measurable goals for Year 4 include reviewing WNYSC checklists for construction site plan review and site inspections and incorporating additional Authority requirements. Copies of the final checklists will be included in the Authority’s SWMP during the Year 4 revision.</p>	

Minimum Control Measure 5. Post-Construction Stormwater Management

Use separate rows to explain the different processes, activities, procedures, practices, etc. used by the MS4. Add additional rows as needed.

Permit Reference IV.C.5.a, c. Develop and implement a post-construction stormwater management program that addresses stormwater runoff from new development and redevelopment and will reduce the discharge of pollutants to the MEP. Program requirements should include:	Describe Measurable Goals and Results (when applicable) Indicate: Date Completed, Ongoing Task, or Scheduled Date (for next years activities)
<ul style="list-style-type: none"> • A combination of structural and/or non-structural management practices. • <i>Identify and describe below procedures to ensure installation of post-construction management practices. <u>Revise as procedures are updated.</u></i> 	DO NOT ENTER INFORMATION IN THIS CELL
AUTHORITY PROGRAM AND ACCOMPLISHMENTS	
<p>STRUCTURAL MANAGEMENT PRACTICES - The Authority has proactively implemented structural post-construction BMPs, including oil/water separators and an in-line spill containment system, and will continue to utilize these structural post-construction BMPs to address stormwater runoff from new development and redevelopment projects that disturb greater than or equal to one acre.</p> <p>The existing structural BMPs will be evaluated on an annual basis to ensure their appropriateness and effectiveness in reducing stormwater runoff impacts to the maximum extent practicable. Structural BMPs will be updated as necessary during the annual SWMP review to reflect changing conditions on Authority property.</p>	<p>MEASURABLE GOAL – Update BMPs and incorporate into the SWMP</p> <p>YEAR 3 RESULTS – This goal was accomplished in Year 3. The Authority’s SWMP was updated and revisions were issued in June 2005.</p> <p>SCHEDULE – On-going. Anticipated Year 4 revision date is June 2006.</p>
<p>NON-STRUCTURAL MANAGEMENT PRACTICES – Refer to Minimum Control Measure 6 for information on the non-structural post-construction BMPs implemented by the Authority.</p>	
<ul style="list-style-type: none"> • Procedures for site plan and SWPPP review to ensure SWMPs meet state standards. • <i>Describe procedures below. <u>Revise as procedures are updated.</u></i> 	<ul style="list-style-type: none"> • <i>Example measurable goals include: number of plans received; number of plans reviewed; percent of plans received that are reviewed.</i>
Refer to “Construction Site Plan Review Procedures” described in Minimum Control Measure 4 for information on the site plan and SWPPP review process.	

Minimum Control Measure 5. Post-Construction Stormwater Management

Use separate rows to explain the different processes, activities, procedures, practices, etc. used by the MS4. Add additional rows as needed.

Permit Reference IV.C.5.a, c. (continued): Develop and implement a post-construction stormwater management program that addresses stormwater runoff from new development and redevelopment and will reduce the discharge of pollutants to the MEP. Program requirements should include:	Describe Measurable Goals and Results (when applicable) Indicate: Date Completed, Ongoing Task, or Scheduled Date (for next years activities)
<ul style="list-style-type: none"> • Procedures for inspection and maintenance of post-construction management practices. • <i>Explain procedures below. <u>Revise as procedures are updated.</u></i> 	<ul style="list-style-type: none"> • <i>Example measurable goals are number of: inspections maintenance activities performed.</i>
<p>STORMWATER CONVEYANCE SYSTEM INSPECTION AND MAINTENANCE - The Authority’s storm sewers, catch basins, and post-construction BMPs (i.e., oil/water separators) are inspected on an annual basis by the Authority Maintenance Staff to identify maintenance needs. This inspection is typically conducted in spring (March or April) following the final snowmelt of the season. A copy of the Authority’s detailed inspection form is attached.</p> <p>Stormwater conveyance facilities are cleaned on an “as-needed” basis in conjunction with the annual inspection, and as required following a spill incident. Typical maintenance procedures include removal of large debris and silt from stormwater facilities. When sewer maintenance needs exceed the capabilities of the Authority Maintenance Staff, the Authority will contract an outside firm, who is a certified waste hauler, to complete the required work.</p>	<p>MEASURABLE GOAL – Continue to develop inspection and maintenance program</p> <p>YEAR 3 RESULTS – This goal was accomplished in Year 3. Storm facilities were inspected 4 times during Year 3 and cleaned once in Spring 2005. This work was used to further refine the inspection and maintenance program.</p> <p>SCHEDULE – The comprehensive system inspection scheduled for Year 4 (April 2006) will be used to refine the BMP inspection and maintenance program. After Year 4 anticipate that inspection and maintenance program will be set and fully operational.</p> <p>MEASURABLE GOAL – Implement inspection and maintenance program</p> <p>YEAR 3 RESULTS – This goal was accomplished in Year 3. Storm facilities were inspected 4 times during Year 3 and cleaned once in Spring 2005.</p> <p>SCHEDULE – On-going. Year 4 inspection scheduled for April 2006. Anticipated Year 4 cleaning will be in June 2006.</p>
<ul style="list-style-type: none"> • Procedures for enforcement and penalization of violators. • <i>Explain procedures below. <u>Revise as procedures are updated.</u></i> 	<ul style="list-style-type: none"> • <i>Example measurable goals: number enforcement activities performed.</i>
<p>As a private, non-traditional MS4 operator, the Authority is fully responsible for implementing post-construction management practices, as well as properly operating and maintaining them. Therefore, a regulatory mechanism for program enforcement is not required.</p>	

Minimum Control Measure 5. Post-Construction Stormwater Management

Use separate rows to explain the different processes, activities, procedures, practices, etc. used by the MS4. Add additional rows as needed.

<p>Permit Reference IV.C.5.a, c. (continued): Develop and implement a post-construction stormwater management program that addresses stormwater runoff from new development and redevelopment and will reduce the discharge of pollutants to the MEP. Program requirements should include:</p>	<p>Describe Measurable Goals and Results (when applicable) Indicate: Date Completed, Ongoing Task, or Scheduled Date (for next years activities)</p>
<ul style="list-style-type: none"> • Adequate resources for a program to inspect new and re-development sites and for enforcement and penalization of violators. • <i>Describe resources below. Update annually.</i> 	<p>DO NOT ENTER INFORMATION IN THIS CELL</p>
<p>As a private, non-traditional MS4 operator, the Authority is fully responsible for implementing post-construction management practices, as well as properly operating and maintaining them. Therefore, additional resources for program enforcement are not required.</p>	
<p>Additional Techniques (Completed in conjunction with the WNYSC)</p>	<p>Describe Measurable Goals and Results (when applicable) Indicate: Date Completed, Ongoing Task, or Scheduled Date (for next years activities)</p>
<p>None in Year 3</p>	
<p>Explain any changes or additions to the Permit Referenced Activities / Techniques, Measurable Goals and / or Scheduled Dates above and provide a reason(s) for the change: N/A</p>	

Minimum Control Measure 6. Pollution Prevention/Good Housekeeping for Municipal Operations

OVERALL MUNICIPAL POLLUTION PREVENTION / GOOD HOUSEKEEPING PROGRAM INFORMATION

<ul style="list-style-type: none"> • This table is for MS4s to report on their OVERALL Municipal Pollution Prevention / Good Housekeeping Program. • A separate table follows that is for MS4s to report on management practices performed in identified municipal operations. • Refer to the Municipal Pollution Prevention / Good Housekeeping Assistance document for example best management practices, policies and procedures. • Use separate rows to explain the different processes, activities, procedures, practices, etc. used by the MS4. Add additional rows as needed. 	
<p>Permit Reference IV.C.6.a: Develop and implement an operation and maintenance program to reduce and prevent pollutant discharges from municipal operations to the MEP.</p>	<p>Describe Measurable Goals and Results (when applicable) Indicate: Date Completed, Ongoing Task, or Scheduled Date (for next years activities)</p>
<ul style="list-style-type: none"> • <i>List pollutants that will be addressed by the municipal pollution prevention program.</i> 	
<p>AUTHORITY PROGRAM AND ACCOMPLISHMENTS</p>	
<p>The pollutants that are addressed by the municipal pollution prevention program include settleable materials (silt, etc.) and liquid materials that could be spilled from vehicles crossing the Peace Bridge (i.e., gasoline)</p>	
<ul style="list-style-type: none"> • <i>Set and describe pollution prevention priorities by geographic areas, municipal operation type, and facilities.</i> 	<p>DO NOT ENTER INFORMATION IN THIS CELL</p>
<p>The following management practices have been implemented by the Authority to reduce settleable materials:</p> <ul style="list-style-type: none"> • Street and Bridge Maintenance • Winter Road Maintenance • Stormwater System Maintenance • Vehicle and Fleet Maintenance <p>Standard operating procedures (SOPs) for these practices are defined in the Authority’s SWMP and are discussed in more detail in the following pages.</p>	<p>MEASURABLE GOAL – Revise operations and maintenance (O&M) practices and SOPs YEAR 3 RESULTS – This goal was accomplished in Year 3 in conjunction with the SWMP revision. The Authority’s SWMP was updated and revisions were issued in June 2005. SCHEDULE – On-going. Anticipated Year 4 revision date is June 2006.</p>
<p>The Authority installed an in-line spill containment system to prevent any spilled materials on the Peace Bridge from entering the Niagara River.</p> <p>The Authority has a standard operating procedure for personnel responding to an emergency, which includes spill response and containment procedures. This is reviewed and revised annually in conjunction with the SOPs described above.</p>	

Minimum Control Measure 6. Pollution Prevention/Good Housekeeping for Municipal Operations

OVERALL MUNICIPAL POLLUTION PREVENTION / GOOD HOUSEKEEPING PROGRAM INFORMATION

<p>Permit Reference IV.C.6.a: Include a municipal pollution prevention training component for staff (where all staff are trained).</p> <ul style="list-style-type: none"> • <i>Explain activities and materials used to meet this requirement.</i> • <i>Identify training needs and design training component.</i> • <i>Determine the adequacy and appropriate frequency of staff training</i> • <i>Identify personnel or outside organization conducting activities.</i> 	<p>Describe Measurable Goals and Results (when applicable) Indicate: Date Completed, Ongoing Task, or Scheduled Date (for next years activities)</p>
<p>EMPLOYEE STORMWATER TRAINING - The Authority will organize and conduct training sessions for Authority employees on stormwater management. Topics will include, at a minimum, an overview of stormwater and the SPDES permit requirements; the potential impacts of illicit connections and discharges on stormwater and how they can be detected and eliminated; best management practices for stormwater management; review of the Authority’s Stormwater Management Program and standard operating procedures.</p> <p>Training materials will be developed by the Authority’s stormwater consultant in Years 3 and 4. Training will be conducted by Authority’s health and safety coordinator every two years and as necessary to update employees on major changes to the SWMP.</p>	<p>MEASURABLE GOAL – Train employees YEAR 3 RESULTS – This goal was not accomplished in Year 3. The Authority’s consultant started developing training materials (PowerPoint presentation, handouts) but they were not complete in Year 3. SCHEDULE – Development of training materials will be completed in Year 4. Initial training will be conducted in Years 4 and 5, and every two years thereafter.</p>
<p>WNYSC P2/GOOD HOUSEKEEPING TRAINING - A 3 hour long training session has been developed to train municipal employees. Incorporated into the training are 17 best management practices that apply to municipal operations, along with 17 inspection checklists that have been developed for BMP activity recordkeeping. The training components have been designed by the WNY Stormwater Coalition.</p>	<p>SCHEDULE – Authority’s consultant will attend P2/Good Housekeeping training offered by WNYSC on April 13, 2006.</p>
<p>Additional Techniques</p>	<p>Describe Measurable Goals and Results (when applicable) Indicate: Date Completed, Ongoing Task, or Scheduled Date (for next years activities)</p>
<p>None in Year 3</p>	
<p>Explain any changes or additions to the Permit Referenced Activities / Techniques, Measurable Goals and / or Scheduled Dates above and provide a reason(s) for the change:</p> <p>Providing employee stormwater training was not accomplished in Year 3 and is moved to a goal for Years 4 and 5. The Authority’s consultant started to prepare training materials (PowerPoint presentation, handouts) but they were not finalized in time to complete training in Year 3.</p>	

Minimum Control Measure 6. Municipal Operations: X Street and Bridge Maintenance; X Winter Road Maintenance; X Stormwater System Maintenance; X Vehicle and Fleet Maintenance; ___ Park and Open Space Maintenance; ___ Municipal Building Maintenance; ___ Solid Waste Management; X Other: Spill Response and Prevention

<ul style="list-style-type: none"> • Copy this page and give it to each municipal office or department responsible for reporting. • Put an ‘X’ in front of each municipal operation type addressed by the Municipal Pollution Prevention/Good Housekeeping Program in that office or department. • Refer to the Municipal Pollution Prevention / Good Housekeeping Assistance document for example best management practices, policies and procedures. • Use separate rows to explain the different processes, activities, procedures, practices, etc. used by the MS4. Add additional rows as needed. 	
<p>Permit Reference IV.C.6.a, c: Develop and implement an operation and maintenance program to reduce and prevent pollutant discharges from the municipal operation(s) indicated above to the MEP.</p> <ul style="list-style-type: none"> • <i>Describe how the bulleted items below focus on pollutants addressed by the municipal pollution prevention program and the pollution prevention priorities.</i> 	<p>Describe Measurable Goals and Results (when applicable) Indicate: Date Completed, Ongoing Task, or Scheduled Date (for next years activities)</p>
<ul style="list-style-type: none"> • <i>Briefly describe or reference any existing policies and procedures</i> • <i>Briefly describe or reference any policies and procedures being developed</i> 	<p>DO NOT ENTER INFORMATION IN THIS CELL</p>
<p>SPILL RESPONSE AND PREVENTION - The Authority has developed and implemented a standard operating procedure for personnel responding to an emergency, which includes spill response and containment procedures. The Authority also has a specific SOP for operation and maintenance of the in-line spill containment system.</p>	<p>YEAR 3 RESULTS: In-line spill containment valve inspected October 2005.</p>
<ul style="list-style-type: none"> • <i>Briefly describe or reference any existing best management practices</i> • <i>Briefly describe or reference any planned best management practices</i> 	<p>DO NOT ENTER INFORMATION IN THIS CELL</p>
<p>STREET AND BRIDGE MAINTENANCE - The Authority Maintenance Staff cleans (sweeps) the Peace Bridge deck, United States Plaza, and associated roadways, sidewalks, and parking lots a minimum of four times each year, weather permitting. The first cleaning is typically conducted in spring (March or April) following the final snowmelt of the season, and on an “as-need” basis the remainder of the year. The Authority is proactive in maintaining the Peace Bridge and United States Plaza. The Authority has implemented an on-going work program to maintain the Authority-owned property, including pier repairs, deck maintenance, and stormwater conveyance system improvements.</p>	<p>YEAR 3 RESULTS: Roadways cleaned/swept weekly in Year 3.</p>

Minimum Control Measure 6. Municipal Operations: X Street and Bridge Maintenance; X Winter Road Maintenance; X Stormwater System Maintenance; X Vehicle and Fleet Maintenance; ___ Park and Open Space Maintenance; ___ Municipal Building Maintenance; ___ Solid Waste Management; X Other: Spill Response and Prevention

<p>WINTER ROAD MAINTENANCE - The Authority made changes in its deicing procedures in an attempt to reduce stormwater sediment loadings and maintain the integrity of the bridge and roadways. Prior to the 2002-2003 winter season, a 7:1 sand-salt mixture was used for deicing purposes. However, the corrosivity of rock salt, coupled with maintenance issues resulting from sand in the storm sewers, led the Authority to look for other alternatives.</p> <p>The Authority is using two alternative deicing products that are targeted for specific application locations. A liquid deicer (Caliber® M2000, which is manufactured by Glacial Technologies) is applied on the bridge deck and between inspection points in the United States Plaza. This chemical was selected because of its low corrosion rate, which is just above that of distilled water. The liquid deicer is delivered in bulk and stored in a 6,000-gallon underground storage tank, from where it can be pumped onto an application vehicle.</p> <p>A treated salt (Magic Salt™) is utilized for deicing purposes in the remainder of the plaza and Authority parking lots. Like the liquid deicer, this product has no corrosive characteristics, and because it is treated, it lasts longer than traditional rock salt. To protect the stockpile of treated salt from the environment, it is stored in an above ground salt storage bin. During the summer months, any remaining salt from the previous winter season is moved adjacent to the piers underneath the Canadian side of the Peace Bridge for storage. While stored in this location, the salt reserve is covered to prevent exposure to the elements.</p>	<p>YEAR 3 RESULTS:</p> <p>Approximately 450 tons treated salt applied in Year 3.</p> <p>Approximately 6,000 gallons liquid deicer applied in Year 3.</p>
<p>STORMWATER SYSTEM MAINTENANCE - The Authority’s storm sewers, catch basins, and post-construction BMPs (i.e., oil/water separators) are inspected on an annual basis by the Authority Maintenance Staff to identify maintenance needs. This inspection is typically conducted in spring (March or April) following the final snowmelt of the season. A copy of the Authority’s detailed inspection form is attached.</p> <p>Stormwater conveyance facilities are cleaned on an “as-needed” basis in conjunction with the annual inspection, and as required following a spill incident. Typical maintenance procedures include removal of large debris and silt from stormwater facilities. When sewer maintenance needs exceed the capabilities of the Authority Maintenance Staff, the Authority will contract an outside firm, who is a certified waste hauler, to complete the required work.</p>	<p>YEAR 3 RESULTS:</p> <p>Storm facilities were inspected 4 times during Year 3.</p> <p>Storm facilities were cleaned once in Spring 2005.</p>

Minimum Control Measure 6. Municipal Operations: X Street and Bridge Maintenance; X Winter Road Maintenance;
 X Stormwater System Maintenance; X Vehicle and Fleet Maintenance; ___ Park and Open Space Maintenance; ___ Municipal Building Maintenance;
 ___ Solid Waste Management; X Other: Spill Response and Prevention

<p>VEHICLE AND FLEET MAINTENANCE - The Authority owns and maintains a wash bay on the Canadian side of the Peace Bridge. All Authority-owned vehicles are washed on an “as-need” basis in this designated area, and the wash bay drains are connected to the sanitary sewer. Any vehicle or parts washing that is done on the United States side of the bridge is conducted in the Authority maintenance garage using an electric pressure washer. The floor drains in the maintenance garage are also connected to the sanitary sewer.</p> <p>Authority vehicle maintenance activities are primarily conducted off-site. Vehicles are taken to off-site maintenance shops for regular oil changes and major repairs. Minor vehicle maintenance, such as changing the oil in the Authority’s lawnmowers, is conducted in the maintenance garage in the United States plaza. Wastes generated from these activities are stored in a designated waste oil container. The Authority has a contract with a certified waste disposal contractor to remove and dispose of waste oil on an “as need” basis, when the designated container is full.</p>	
<ul style="list-style-type: none"> • <i>Identify and describe the equipment and staff that are in place</i> 	<p>DO NOT ENTER INFORMATION IN THIS CELL</p>
<p>MANPOWER - The Authority Maintenance Staff performs all maintenance activities on the Authority’s stormwater collection system. There are sixteen (16) full-time Authority Maintenance Staff personnel.</p>	
<p>EQUIPMENT - The Authority owns and/or leases vehicles for use by Maintenance Staff crews. Equipment used for regular maintenance includes pickup trucks, sport utility vehicles, vans, combination dump trucks and plow-sanders, a street sweeper, a flusher truck, tractor, and skid steer and wheel loaders.</p>	

Minimum Control Measure 6. Municipal Operations: X Street and Bridge Maintenance; X Winter Road Maintenance; X Stormwater System Maintenance; X Vehicle and Fleet Maintenance; ___ Park and Open Space Maintenance; ___ Municipal Building Maintenance; ___ Solid Waste Management; X Other: Spill Response and Prevention

<ul style="list-style-type: none"> • Copy this page and give it to each municipal office or department responsible for reporting. • Put an 'X' in front of each municipal operation type addressed by the Municipal Pollution Prevention/Good Housekeeping Program in that office or department. • Refer to the Municipal Pollution Prevention / Good Housekeeping Assistance document for example best management practices, policies and procedures. • Use separate rows to explain the different processes, activities, procedures, practices, etc. used by the MS4. Add additional rows as needed. 	
<p>Permit Reference IV.C.6.a, c (continued): Develop and implement an operation and maintenance program to reduce and prevent pollutant discharges from municipal operations to the MEP.</p>	<p>Describe Measurable Goals and Results (when applicable) Indicate: Date Completed, Ongoing Task, or Scheduled Date (for next years activities)</p>
<ul style="list-style-type: none"> • <i>Assess if existing programs adequately reduce and/or prevent pollutant discharges</i> • <i>Determine and list any operation type, location or facility that is in need of modification or updates.</i> 	<p>DO NOT ENTER INFORMATION IN THIS CELL</p>
<p>Based on visual observation, there has been a significant reduction in the amount of sediment in catch basins and on roadways as a result of the change in winter road maintenance techniques.</p>	<p>MEASURABLE GOAL – Audit facilities and identify problem areas YEAR 3 RESULTS – This goal was accomplished in Year 3 and information gathered was used to update SOPs.</p>
<p>Permit Reference IV.C.6.a: If there is a training component for staff specific to these municipal operations:</p> <ul style="list-style-type: none"> • <i>explain the activities and materials;</i> • <i>identify the personnel or outside organization conducting the activities.</i> 	<p>Describe Measurable Goals and Results (when applicable) Indicate: Date Completed, Ongoing Task, or Scheduled Date (for next years activities)</p>
<p>Additional Techniques</p>	<p>Describe Measurable Goals and Results (when applicable) Indicate: Date Completed, Ongoing Task, or Scheduled Date (for next years activities)</p>
<p>None in Year 3</p>	
<p>Explain any changes or additions to the Permit Referenced Activities / Techniques, Measurable Goals and / or Scheduled Dates above and provide a reason(s) for the change:</p>	

Did you include any of the following documents as appendices? Put a mark each appended document.

Summary of public comments received on the annual report at the public presentation (**Required**) [APPENDIX A]

Intended response to comments on the annual report (**Required**) [APPENDIX A]

Results of information collected and analyzed, including monitoring data; evaluation of assessment (modeling) of pollutant discharges, including modeling results and pollutant transport trends.

Other Authority Post-Construction BMP Inspection Form [APPENDIX B]

**ADDENDUM REPORTING FOR
MS4S THAT LACK LEGAL AUTHORITY TO ADOPT
REGULATORY MECHANISMS FOR IDDE AND
CONSTRUCTION / POST-CONSTRUCTION STORMWATER RUNOFF CONTROL**

BE SURE TO INDICATE THE MS4 NAME AND PERMIT NUMBER IN THE HEADER

ADDENDUM 1. Minimum Control Measure 3. Illicit Discharge Detection and Elimination (IDDE) Local Law

Permit Reference IV.C.3.c: Prohibit, through an ordinance, local law or other regulatory mechanism, illicit discharges into the MS4. The MS4s have until year 5 to complete this work.		
1) When was this work completed or planned to be completed?	Date completed: _____ <input checked="" type="checkbox"/> Not yet completed Plan to complete for reporting in year: ___4; <input checked="" type="checkbox"/> 5.	
2) Indicate which of the control mechanisms or procedures to the right used by the MS4 notify staff and others doing work on behalf of the MS4 about prohibition of and enforcement against illicit discharges:	<input type="checkbox"/> Interconnection agreements <input type="checkbox"/> Maintenance directives / BMPS <input type="checkbox"/> Access Permits <input checked="" type="checkbox"/> Tenant Leases	<input type="checkbox"/> Consultant Agreements <input checked="" type="checkbox"/> Construction/Bid Documents <input checked="" type="checkbox"/> Other <u>Internal Training</u>
3) Indicate which of these control mechanisms contain specific language prohibiting illicit discharges:	<input type="checkbox"/> Interconnection agreements <input type="checkbox"/> Maintenance directives / BMPS <input type="checkbox"/> Access Permits <input checked="" type="checkbox"/> Tenant Leases	<input type="checkbox"/> Consultant Agreements <input checked="" type="checkbox"/> Construction/Bid Documents <input type="checkbox"/> Other _____ _____
4) Explain how the MS4 intends to prohibit illicit discharges if: <ul style="list-style-type: none"> • none of the mechanisms in number 2 contain language prohibiting illicit discharges; or • the MS4 intends to add language to prohibit illicit discharges in other control mechanisms. 	Explanation: Language will be added to tenant lease agreements and construction/bid documents to prohibit illicit discharges. Suggested language for these documents will be developed by a legal consultant contracted with the WNYSC. This work is funded through a grant and will be complete by Year 5.	
5) Explain how the MS4 (intends to) enforce against illicit dischargers within their jurisdiction?	Explanation: This has not been determined yet, but will be addressed in Years 4 and 5.	

ADDENDUM 2. Minimum Control Measure 4 & 5. Construction Site & Post-Construction Stormwater Runoff Control Local Law

Permit Reference IV.C.4.b.i, 5.a.i: Require development and implementation of erosion and sedimentation controls through a local law or other regulatory mechanism. The MS4s have until year 5 to complete this work.	
1) When was this work completed or planned to be completed?	Date completed: _____ <input checked="" type="checkbox"/> Not yet completed Plan to complete for reporting in year: ___4; <input checked="" type="checkbox"/> 5.
2) Indicate which of the control mechanisms or procedures below are used by the MS4 to notify staff and others doing work on behalf of the MS4 about the <u>erosion, sedimentation and stormwater management requirements</u> for projects under the MS4s jurisdiction. (These requirements are based on the Construction Permit (GP-02-01) and MS4 Permit (GP-02-02)).	
<input type="checkbox"/> Access Permits <input type="checkbox"/> Tenant Leases <input type="checkbox"/> Requests for Proposals (RFPs) <input checked="" type="checkbox"/> Scope of Services	<input type="checkbox"/> Consultant Agreements <input checked="" type="checkbox"/> Construction / Bid Documents <input type="checkbox"/> Other Policies / Procedures _____
3) All of the <u>erosion, sedimentation and stormwater management requirements</u> below must be addressed by the MS4's control mechanisms. For the control mechanisms identified in number 2 above, state in the left hand cells below the control mechanism(s) that contain the language.	
Control Mechanism	Erosion, Sedimentation and Stormwater Management Requirements
Scope of Services	Require all projects to have SWPPPs, as in GP-02-01
Scope of Services	Require all 16 components of a basic SWPPP (erosion and sediment control)
Scope of Services	Require all additional 7 components for a full SWPPP when post-construction control is required
Scope of Services	Meet the standards in the <i>Erosion and Sediment Control</i> and <i>Stormwater Management Design Manuals</i> (or otherwise meet the requirements of GP-02-01)
Construction / Bid Documents	Require contractor certification statements stating that the contractor will agree to comply with the terms and conditions of the SWPPP
Construction / Bid Documents	Require proper operation and maintenance of stormwater facilities during construction
	Require proper operation and maintenance of stormwater facilities after construction
Scope of Services	Require SWPPPs to be certified by a licensed / certified individual when there is a deviation from technical standards or direct discharge to a 303(d) segment or TMDL watershed subject to condition A of GP-0-01
	Have a process for review of SWPPPs
Scope of Services	Require site self inspections as in GP-02-01
	Have enforcement procedures during and after construction
Construction / Bid Documents	Require construction site operators to control waste
	Procedures for receipt and consideration of information submitted by the public
4) If any of the requirements in number 3 are not addressed, explain how the MS4 intends to incorporate them into the control mechanisms?	Explanation: The Authority will be directly responsible for proper operation and maintenance of stormwater facilities after construction, reviewing SWPPPs, having enforcement procedures during and after construction, and following procedures for receipt and consideration of information submitted by the public

ADDENDUM 2. Minimum Control Measure 4 & 5. Construction Site & Post-Construction Stormwater Runoff Control Local Law

<p>5) Explain how the MS4 intends to enforce the requirements within their jurisdiction?</p>	<p>Explanation: The Authority is a private, non-traditional MS4 operator, and, as a result, has full control over all construction projects on its property. Enforcement requirements will be determined on a project-by-project basis, and penalties for non-compliance with the Authority's stormwater construction site stormwater runoff control program will be documented in the scope of services and project construction / bid documents.</p>
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APPENDIX A
PUBLIC REVIEW MEETING DOCUMENTATION

Public Comments Received on Year Three Annual Report

1. I feel that ALL member municipalities should have a link on their website to the WNY Stormwater Coalition. In West Seneca, the Environmental Commission has just established a web page and created a link to the WNY Stormwater Coalition. I would say that all municipalities should involve their Environmental Commissions in the MS4 initiative.

Response: *The WNYSC website will be updated to include links to the MS4s. One of our Year 4 tasks is to provide each MS4 with a model stormwater page that will include a link to the WNYSC site.*

2. I think that the Stormwater Coalition should establish an electronic newsletter that individuals, groups and schools can subscribe to. This newsletter could promote all upcoming events, such as the October 2006 Open Stormwater Coalition Meeting. Additional marketing should be done for that meeting so that attendance will be maximized. I would have liked to have attended the March 06 meeting, but was unaware.

Response: *The WNYSC is in the process of working toward full compliance by 2008. Although a newsletter is potentially an excellent public education tool, at this time, we must focus on meeting the specific measurable goals that are conditions of our stormwater permit.*

Standard press releases are issued for our open meetings and attracting the public is a goal yet to be realized. The WNYSC's public education/participation workgroup will investigate other avenues to market the public involvement components of our SWMP.

3. I am happy that you (the Coalition) are working with Buffalo Riverkeepers. They will be able to help promote your events and policies. Riverkeeper members can also make sure that their municipalities comply with the new regulations. As a matter of fact, the Riverkeepers should have a link to the WNY Stormwater Coalition website, as well.

Response: *A Riverkeepers representative is an active member of the WNYSC and participates in the public education/participation workgroup. We will discuss Riverkeepers adding a link to the WNYSC webpage.*

4. The Erie County Water Authority should be a partner in this initiative. They could send out MS4 information flyers with their bills.

Response: *Utilizing billing programs to include stormwater education offers a relatively low-cost method to educate the public on stormwater pollution prevention. The Erie County Water Authority bills are not an option for such mailings because they use a*

postcard for billing. Partnering with the Erie County Water Authority has not been discussed by the WNYSC members. However, a number of local government agencies, such as the Erie County Department of Environment & Planning's Division of Sewerage Management and Division of Environmental Compliance, the Erie/Niagara County Highway Departments, the Erie/Niagara County Soil & Water Conservation Districts, the NYS Department of Environmental Conservation and the NYS Department of Transportation, are active participants in the Coalition.

5. It would be great to have a Clean Water display at the Erie County Fair. The Public Education Display could be used. I would be happy to give you a contact at the Fair to set that up (my husband's uncle, Denny Lang, is the CEO of the Fair).

Response: *The WNYSC has not had its own booth at the Erie County or Niagara County Fair. It is certainly an option we can discuss. We have utilized other environmental exhibitor's space at the fair by providing them with our Household Guide to Stormwater Pollution Prevention.*

6. The Rain Garden is a great concept. I am very pleased that there will be a display in West Seneca. It would be helpful if there could be a list of "participating nurseries" who stock the plants featured in the display. There is nothing more frustrating than trying to duplicate an idea when the materials used are generally unavailable.

Response: *We will develop a list of local nurseries for the Rain Garden project.*

7. I do not clearly understand IDDE. Is the function of same mapping only, or is remediation the ultimate goal?

Response: *The primary objective of illicit discharge detection and elimination is to identify stormwater outfalls that are discharging pollutants to receiving waters, track down the pollutants to their source and eliminate it. The source may be intentional, such as dumping, or inadvertent such as cross connections with sanitary sewers. Mapping is an important component of the IDDE program as it identifies the location of all outfalls for inspection/monitoring efforts.*

8. Is the education program ready for rollout in the 06/07 school year? My son will be in the fifth grade next year and I would love for him to do a unit on Clean Water. (they just did a unit on pesticides)

Response: *The Teacher Education Packages are final and include lessons for all grade levels. NYS curriculum determines the grade level(s) for water-related topics.*

9. It is my understanding that legislation is to be adopted by all MS4 municipalities by 2007 (year 4)-? Who will enforce the legislation? When will NYS IDDE Model Law be available and where? The model for WNY should be written so local municipalities

can adopt and implement the plan as part of their Town Code and as an update or addendum to Comprehensive Plans (both existing and proposed plans). The legislation needs teeth so that the municipalities feel the impetus to adopt as law, not that it is just a nice idea that we'll get to someday. The Erie County Legislature and all Town Boards should receive a brief monthly update of the activities of the WNY Stormwater Coalition.

Response: *The MS4s are required to adopt the local laws by January 2008. The members of the WNYSC will be adopting the model local laws developed by NYSDEC in their entirety. The adoption process has commenced (Year 4 started March 2006). The individual MS4s will enforce their local laws. NYSDEC regulates the MS4s. The model IDDE law is available on the NYSDEC website at: <ftp://ftp.dec.state.ny.us/dow/stormdocuments/ms4/> The Erie County Legislature and Municipal Boards review the draft Annual Report every year as an identified measurable goal of the SWMP. Additional updates are provided by the individual MS4s as needed.*

10. How will results of this entire initiative be measured? It is important that the commission not get bogged down in strictly fulfilling the compliance obligation as it relates to the concepts presented, but that, at the end of the day, our creeks are safe to swim in and our waters are safe to fish.

Response: *Attainment of measurable goals, designed to collectively reduce the negative impacts of stormwater pollution to the maximum extent practicable, is a measurement tool along with the documentation and/or quantification of Best Management Practices. Water quality sampling is not required by the regulations, however, a small pilot program with Buffalo State College will examine the impact of illicit discharges on receiving water quality.*

11. There could also be established a "Speaker's Bureau" - a group of individuals available to speak to civic and social groups about Clean Water.

Response: *Representatives from the Erie County Department of Environment & Planning, the lead agency for the WNYSC, have given many presentations in classrooms, to garden clubs, to professional organizations and at conferences and workshops.*

12. I read the Stormwater Coalition materials and am impressed by the enormous scope of this undertaking, from the details of the project (especially regarding the 5,000 outfalls), to the extent of the efforts to create public awareness. All of the methods you guys are using to get to the public are a huge undertaking. I believe that the most important outlet might be television - the news channels need to cooperate with the group to disseminate info.

Response: *The WNYSC is preparing a press package with public service announcements and a variety of other public education materials. The package will be completed in 2006 and disseminated to local media. Follow up with media contacts will be extremely important. In addition, several grant proposals have been submitted to fund a public education campaign that will include billboards, bus placards and other avenues.*

APPENDIX B
POST-CONSTRUCTION BMP INSPECTION FORM

