

April 21, 2017

Mr. Neil Bettez, Town Supervisor Town of New Paltz  
Town Hall  
Post Office Box 550  
52 Clearwater Road  
New Paltz, New York 12561

**Re: Municipal Separate Storm Sewer System (MS4) March 10, 2016 through  
March 9, 2017**

Subj: 2016 MS4 Annual Report

File: 1881.027.001

Dear Supervisor Bettez:

Attached are 3 copies of the MS4 Annual Report for the Town of New Paltz - 2 copies are for the Town Hall and 1 copy is to be delivered to the Elting Memorial Library. This report incorporates the progress made by the Town on the MS4 Stormwater Management Program (SWMP) between March 10, 2016 and March 9, 2017.

The electronic copy of this report is to be published on the Town's website to provide the public access to this document. This Report is considered to be in draft form until all public comment, if any, has been considered by the Board. If no comments are received from the public, this report then becomes the final report to be sent to NYSDEC.

A public meeting to receive comments from the Board and the public on the MS4 Annual Report is to be set for 7 PM on Thursday, May 18, 2017. After the public meeting is concluded and public comments (if any) have been adequately addressed, the Town Board should move to accept the 2016 Annual Report and it should be signed by the Town Supervisor on page MCC Page 4. The signed copy of the Annual Report should be:

1. Forwarded to the NYSDEC. The address to send the Report to is: MS4 Permit Coordinator NYSDEC Division of Water 625 Broadway, 4th floor Albany, New York 12233-3505
2. Post the final signed 2016 Annual Report on the Town's website.

The Town was accepted as an MS4 in March 2014. As the Town is now in its third year of the program, it is a condition of the permit that the Town's SWMP is fully implemented (by March 10, 2017 as noted on the MS4 Permit Authorization). As you are aware, the Town's 2013 SWMP Plan will need to be revised later this year to reflect the progress in the program over the past three years and the requirements of the impending new SPDES permit.





It is critical that the Town designate a Stormwater Management Officer (SMO), as required by the newly adopted Stormwater and Illicit Discharge laws, who will be responsible for developing the procedures and forms required for implementation and documentation and to ensure that the law is enforced. We believe it is important that the designated SMO be a full- or part-time Town employee, due to the level of cooperation and sharing of information required between the SMO and staff within the various town departments. One of the most time consuming activities of the SMO at this stage in the program will be to develop the IDDE program (refer to the recommended activities listed below). Many of the other SMO activities, such as inspection and enforcement, are already being undertaken by the Building Inspector.

We have developed the attached matrix of activities to assist you in delineating MS4 responsibilities within the town's departments. It should be noted that the table below does not represent an exhaustive list of MS4 activities, but provides a general overview of the key elements of the program. Refer to the Town's 2013 SWMP Plan for complete details of the program.

In the event of an audit, you will need to have documentation to show that the elements of your program have been completed. Documentation such as the checklists, forms and inventories listed below should be developed as soon as possible to record the relevant information.

The Town should work towards achieving the following items to satisfy the requirements of the MS4 program.

#### **MCM 1 & 2 – Education and Participation**

1. Create a separate tab for the 'MS4 Stormwater Management Program' on the Town's website and include the following (some of this information is already provided on the Town's website, just not consolidated in a single section):
  - Public meeting notice and 2016 Annual Report
  - Town of New Paltz 2013 SWMP Plan
  - Map of the Town's MS4 area
  - Map of the Town's catchbasins, culverts and outfalls
  - Town wetland and floodplain map
  - Local stormwater and illicit discharge laws (Chapter 135 & 136 of Town Code)
  - Ulster County or NYSDEC sponsored Household Hazardous Waste events
  - Other relevant information for public and developers
2. File copies of the Town of New Paltz MS4 SWMP Plan adopted in 2013 in the Building and Planning Department offices;

#### **MCM 3 - Develop IDDE Program**

3. Create a spreadsheet of all outfalls within the MS4 areas and utilize it to record visual dry weather inspections and/or maintenance.
4. Develop/adopt a form to be used for discharges investigated during routine road maintenance.





5. Highway Department or SMO to conduct visual dry weather inspections of 20% of outfalls per year, photograph and document inspections and report potential non-stormwater discharges for further investigation.
6. Develop list of target contaminant generating sites/sewer sheds for inspection based on Building/Assessor Department records for the types of sites that typically generate pollutant levels of concern (MCM 3 Page 1 of 4 of the Annual Report).

**MCM4 – Construction SW management**

7. Develop inventory of active construction sites, including location of the site, owner/operator contact information and installed SWPs.
8. Develop inventory of all SWPs (GPS referenced), both town owned and private. This may be as simple as a list to including type, location, owner and required maintenance.
9. Develop form/checklist to be used to document site inspections including erosion and sediment control measures and protection of SWPs during construction.

**MCM5 – Post-Construction SW management**

10. Investigate and adopt funding mechanism to ensure privately owned stormwater practices are inspected and maintained post-construction.
11. Maintain a record of SWP inspections and maintenance activities.

**MCM 6 – Good Housekeeping**

12. Create a list of streets within the MS4 area and calculate this number of miles and the number of catch basins that exist in these designated MS4 areas;
13. Develop/adopt form to be used for catchbasin inspection/cleaning. Maintain record of sweeping and catchbasin inspection/cleaning.

Our office would be pleased to assist in achieving any of the above record keeping, mapping or inspection goals in whatever capacity is needed. Please feel free to call if you have any questions, comments, or if we may be any further assistance.

Sincerely,  
Barton & Loguidice, D.P.C.

Rebecca A. Minas, Senior Engineer

**Attachment – Example of MS4 Program Activities & Responsibilities Matrix (draft for discussion)**

Activity	Potential Responsible Party
<b>MCM 1 &amp; 2 – Public Education and Participation</b>	
Ongoing public education and public participation program	Town Supervisor with support of ENCB
<b>MCM 3 - IDDE</b>	
Visual dry weather outfall inspection (20% outfalls per year)	Hwy Dept / SMO
Develop IDDE program (i.e., identify priority areas and target sites, inventory outfalls, etc.)	SMO
Implement IDDE program (i.e., identify and locate illicit discharges)	Hwy Dept / SMO / Building Insp
Maintain inventory of outfalls [GPS referenced]	Town Engineer; or SMO/Hwy Dept (when GIS system available)
<b>MCM 4 – Construction Site SW Runoff</b>	
Review SWPPPs	Town Engineer
Accept SWPPPs based on recommendation of Town Engineer	SMO / Building Insp
Review and accept SWMP Maintenance Agreements	Town Attorney
Collect and file before construction: a) Contractor Certification Statements (E&SC Training Cert) b) SW Facility Registration Statement (DEC response letter to NOI)	SMO / Building Insp
Undertake construction inspections to verify accordance with SWPPP	Building Insp / SMO and Town Engineer, as required
Request monitoring and SWPPP reporting, where necessary	SMO and Town Engineer, as required
Maintain records of inspections and corrective actions	Building Insp / SMO
Maintain inventory of active construction sites	Building Insp
<b>MCM 5 - Post Construction SW Runoff</b>	
Maintain inventory of post-construction SWPs	Highway Dept / Building Insp / SMO
Implement inspection and maintenance program and report violations for enforcement	Highway Dept
Take action for violation of local SW law (e.g. issue notice, stop work)	Building Insp / SMO
<b>MCM 6 – Good Housekeeping</b>	
Document good housekeeping practices are being following (i.e. maintain inventory of municipally owned vehicles and maintenance records, record catch basin and storm drain cleaning program, etc.)	Highway Dept