

Town of Ithaca



Stormwater Management
Program Plan

In Conformance with
NYSDEC Permit GP-0-24-001

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LIST OF ACRONYMS/DEFINITIONS

BMP	Best Management Practice Defined by DEC as scheduled activities, prohibitions of practices, maintenance procedures, and other management practices to prevent or reduce the pollution of waters of the state. BMPs also include treatment requirements, operating procedures, and practices to control runoff, spillage and leaks, sludge or waste disposal, or drainage from areas that could contribute pollutants to stormwater discharges. BMPs are referred to in EPA's fact sheets and other materials. BMPs are also referred to as 'activities' or 'management practices' throughout the DEC SPDES general permit.
BSD	Better Site Design
CGP	NYS DEC SPDES Construction General Permit
CSI	Community Science Institute
DEC	Department of Environmental Conservation
EPA	Environmental Protection Agency
GH	Good Housekeeping
GP	General Permit
IDDE	Illicit Discharge Detection and Elimination
IO	Cayuga Lake Watershed Intermunicipal Organization
LID	Low Impact Development
MCM	Minimum Control Measure
MEP	Maximum Extent Practicable Defined by DEC as a technology-based standard established by Congress in the Clean Water Act §402(p)(3)(B)(iii). Because no precise definition of MEP exists, it allows for maximum flexibility on the part of MS4 operators as they develop their programs.
MS4	Municipal Separate Storm Sewer System
NYS	New York State
POC	Pollutant of Concern
PP	Pollution Prevention
SPDES	State Pollutant Discharge Elimination System
SWMP	Stormwater Management Plan
SWPPP	Stormwater Pollution Prevention Plan
TCSWCD	Tompkins County Soil and Water Conservation District

Introduction

This Stormwater Management Program (SWMP) Plan has been developed to comply with the New York State Department of Environmental Conservation General Permit for Stormwater Discharges from Municipal Separate Storm Sewer Systems (MS4; GP-0-24-001) for Traditional Land Use Control Municipality. US Environmental Protection Agency Stormwater Phase II Rule, issued in 1999, requires MS4 owners and operators, in US Census-defined urbanized areas and in additionally designated areas, to develop a Stormwater Management Program. There are six program elements designed to reduce the discharge of pollutants to the maximum extent practicable (MEP). The program elements, referred to as Minimum Control Measures (MCMs), include the following:

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

This document describes each MCM and the Best Management Practices (BMPs) that have been implemented to maintain compliance with the NYSDEC GP-0-24-001 (GP). The SWMP Plan will be reviewed on an annual basis and updated as necessary to account for progress made. During review the latest technologies and information regarding BMPs will be taken into consideration while maintaining compliance with the NYSDEC GP-0-24-001.

The Town of Ithaca is a mix of urban, suburban, and rural communities located on the Southern end of Cayuga Lake and located in the center of Tompkins County. The total land area is approximately 30.3 square miles, and the 2020 Census reported approximately 22,300 people, with a resulting average population density of approximately 735 people per square mile.

All of the land area within the Town ultimately drains to Cayuga Lake. Major contributing watersheds include the following: West Lake Shore, Buttermilk Creek, Cayuga Inlet, Six Mile Creek, Cascadilla Creek, Fall Creek, and East Shore Section 2. The landscape ranges from very steep slopes along the lake, to open fields, wooded stream corridors, wetland areas, and semi dense suburban neighborhoods.

A large portion of the Town is located within the Ithaca Urbanized Area as defined by the US EPA for purposes of designating communities subject to Municipal Separate Storm Sewer Systems regulations. Although there are parts of the Town outside of the MS4 boundaries, the Town has designated itself as a Town-Wide MS4.

Parts of the SWMP that are indicated in grey are items that are requirements of the MS4 Permit that do not require implementation now. These items will be worked on, completed, and implemented by the deadlines identified within the GP.

I.B.3 Documentation Necessary to Demonstrate Discharge Eligibility.

Not Applicable.

II.A Notice of Intent

Information from NYSDEC acknowledging previous coverage or designation can be found under **Appendix A.**

II.B.4 Electronic NOI Waiver

Not Applicable.

III.A.3 Corrective Actions Implemented to Correct a Violation of an Applicable WQ Standard

If the Town of Ithaca becomes aware that an authorized discharge causes or contributes to the violation of an applicable water quality standard, the Town will implement corrective actions, and this will be documented here.

IV.A.1b Inventory of Entities Assisting in Permit Implementation

Stormwater Coalition of Tompkins County - The Town of Ithaca works with the Stormwater Coalition of Tompkins County to implement components of the permit. The coalition primarily works together on MCM 1 and MCM 2. The Stormwater Coalition of Tompkins County includes the following municipalities: Town of Ithaca, Tompkins County, City of Ithaca, Town of Lansing, Village of Lansing, Town of Newfield, Town of Ulysses, Village of Cayuga Heights, Town Dryden, and Town of Caroline.

Discover Cayuga – The Stormwater Coalition provides funding to Discover Cayuga which provides education and outreach programs to the areas surrounding Cayuga Lake.

IV.A.1d Agreements for Alternative Implementation Options

All agreements for alternative implementation options can be found under **Appendix B.**

IVA2 Staffing Plan/Organizational Chart

The Town of Ithaca has developed an organizational chart including the roles and responsibilities of each person corresponding to the required elements of the SWMP. This is found under **Appendix C.**

IVB1 Stormwater Program Coordinator Name, Title and Contact Information

Jusin McNeal, Stormwater Management Officer, (607) 273-1656, Engineering@townithacany.gov

IVB2 Availability of SWMP Plan;

- a) The existing previous version of the Town of Ithaca SWMP Plan was available during normal business hours upon request at the Public Works Department.
- b) The SWMP Plan is available during normal business hours upon request at the Public Works Department. The plan is also available on the Town of Ithaca website.

IVD Comprehensive System Mapping

The Town of Ithaca develops and maintains comprehensive system mapping of the automatically designated area and additionally designated area. The comprehensive system mapping includes the MS4 outfalls, interconnections, preliminary storm-sewer shed boundaries, MS4 infrastructure, basemap information, land use, roads, and topography. A copy of this map can be found in **Appendix D**.

IVE Adoption of Local Laws

Legal authority to control pollutant discharges to implement the GP can be found under Chapter 227- Storm Sewer System and Surface Waters Protection of the Code of the Town of Ithaca.

Direct link: [Town of Ithaca, NY Storm Sewer System and Surface Waters Protection](#)

IVF1 Enforcement Response Plan (ERP)

The Town of Ithaca has developed and implemented an ERP that describes the actions to be taken for violations that the MS4 Operator has identified for illicit discharges, construction activities, and post-construction practices. This can be found in **Appendix M**.

IVF2 Enforcement Tracking

The Town of Ithaca tracks instances of non-compliance. These instances can be found under **Appendix M**.

V.B.1.b Reporting Electronic Submission Waiver

All reports are submitted electronically to the NYSDEC.

V.B.2.a Annual Report Submission to NYSDEC

Annual reports will be submitted by April 1st. Documentation that the annual report was submitted will be found in **Appendix F**.

V.B.3.a Interim Progress Certifications

Interim progress reports will be submitted by October 1 and April 1. Documentation that the interim reports have been submitted can be found in **Appendix F**.

V.C Evaluation of the SWMP

The Town of Ithaca will evaluate the SWMP for compliance with the terms and conditions of the GP permit at a minimum interval of once every five years. We will look at the effectiveness or deficiencies of components of the individual SWMP Plan, and the status of achieving the requirements outlined in this SPDES general permit. The SWMP evaluation will be documented in the SWMP Plan.

VIA Minimum Control Measure 1: Public Education and Outreach on Stormwater Impacts

The Public Education and Outreach MCM consists of BMPs that focus on the development of educational materials, demonstration activities, and training sessions designed to inform the public about the impacts that stormwater discharges have on local water bodies. The Public Education and Outreach program and BMPs, in combination, are expected to reach the constituents within the MS4's permitted boundary.

VI.A.1.a Focus Areas

By January 2027, the MS4 Operator must identify and document the focus areas in the SWMP Plan. The focus areas to be considered are as follows:

- i. Areas contributing to waterbodies of significant value (i.e., drinking water supply, public bathing beaches, shellfishing, high recreation value);
- ii. Sewersheds for impaired waters listed in Appendix C (subject to Part VIII requirements);
- iii. TMDL watersheds (subject to Part IX requirements);
- iv. Areas with construction activities;
- v. Areas where stormwater flows have potential to cause erosion (e.g., areas with steep slopes, inactive construction sites, unvegetated soil, sand stockpiles for road application);
- vi. Areas with onsite wastewater systems subject to Part VIII or Part IX requirements;
- vii. Residential, commercial, and industrial areas;
- viii. Stormwater hotspots; and
- ix. Areas with illicit discharges.

VI.A.1b Target Audiences(s) and Pollutant Generating Activities for Each Focus Area

By January 2027, the MS4 Operator must identify and document the applicable target audience(s) and associated pollutant generating activities that the outreach and education will address for each focus area identified by the MS4 Operator in Part VI.A.1.a in the SWMP Plan.

VI.A.1.c Education and Outreach Topics and Reduction of Pollutants from Focus Area

By January 2027, the MS4 Operator must identify and document in the SWMP Plan the education and outreach topics and how the education and outreach topics will reduce the potential for pollutants to be generated by the target audience(s) (Part VI.A.1.b.) for the focus area(s) (Part VI.A.1.a.).

These education and outreach topics will reduce the potential for pollutants to be generated by our selected target audiences. By providing educational information about the pollutants that will enter our waterways, it will make these groups of people more aware and less likely to continue harmful practices.

VI.A.1.d Illicit Discharge Education

The Town of Ithaca has information related to the prevention of Illicit Discharges, available to municipal employees, businesses, and the public including the following;

- i. What types of discharges are allowable (Part I.A.3.);
- ii. What is an illicit discharge and why is it prohibited (Part VI.C.);
- iii. The environmental hazards associated with illicit discharges and improper disposal of waste;

- iv. Proper handling and disposal practices for the most common behaviors within the community (e.g., septic care, car washing, household hazardous waste, swimming pool draining, or other activities resulting in illicit discharges to the MS4); and
- v. How to report illicit discharges they may observe (Part VI.C.1.)

Information on Illicit Discharges can be found on the Town of Ithaca eCode, the Stormwater Coalition of Tompkins County website ([Illicit Discharge Detection and Elimination Laws - Stormwater Coalition of Tompkins County](#)), and on the Town of Ithaca website ([Town of Ithaca - Stormwater Management](#)).

Illicit discharges should be reported to the Town Engineer/Stormwater Management Officer. Complaints can be sent to via email to engineering@townithacany.gov, or by calling the Department of Public Works office at (607) 273-1656. Complaints can also be filed on our website at the following address: <https://townithacany.gov/contact/>.

VI.A.2.a Method(s) Used to Distribute Education Messages

By January 2029, and once every 5 years the MS4 Operator must identify and document in the SWMP Plan which of the following method(s) are used for the distribution of educational messages:

- i. Printed materials (e.g., mail inserts, brochures, and newsletters, etc.);
- ii. Electronic materials (e.g., websites, email listservs, etc.);
- iii. Mass media (e.g., newspapers, public service announcements on radio or cable, etc.);
- iv. Workshops or focus groups;
- v. Displays in public areas (e.g., town halls, library, parks, etc.); or
- vi. Social Media (e.g., Facebook, Twitter, blogs, etc.).

Discover Cayuga: Discover Cayuga offers educational programs to local schools and the general public both in the classroom and aboard their boat, the M.V. Haendel. Educational programs offered include:

- Trout in the Classroom – from late October through May of the following year, Discover Cayuga sets up cold-water trout aquariums in participating classrooms throughout Tompkins County. Over 6 months, the students raise the trout, from eggs to fry, in their classroom. They care for the trout, monitor aquarium water quality, and learn about streams. In the spring, the class releases the surviving trout fingerlings into adopted streams in their community.

Coalition Sponsored Trainings: The Stormwater Coalition of Tompkins County provides trainings to municipal members/staff and town/village/county boards on stormwater related topics.

Contractor Trainings: TCSWCD sponsors multiple NYSDEC endorsed 4-Hour Erosion and Sediment Control Trainings for contractors and municipal staff each year.

Newsletter: TCSWCD issues a newsletter once a year. The newsletter contains stormwater related articles, announcements of stormwater trainings, announcements of recycling events/pollution prevention events (tire recycling), and notification of tree/shrub sale.

Tompkins County Stormwater Coalition Website: The Stormwater Coalition of Tompkins County (www.tcstormwater.org) developed and maintains a website with information for the public and contractors in Tompkins County. The website includes information for the public outlining good housekeeping practices for protecting the watershed. The website is being further developed to include all local stormwater laws, procedures for SWPPP review, and actions homeowners can take to reduce stormwater pollution.

Town of Ithaca Stormwater Management Website: The Town of Ithaca website (<https://www.townithacany.gov/departments/engineering/>) provides the public with a user friendly platform where they can find information regarding stormwater permitting, a description of the MS4 program, the SWMP, the interim and annual reports, and educational information.

VI.A.2.b Documentation of Educational Message to each Target Audience

By January 2029, and once every 5 years, an educational message to each target audience for each focus area will be delivered.

VI.A.2.c Updates to Public Education and Outreach

Annual review and update of the focus areas, target audiences, and/or education and outreach topics by April 1.

Following the completion of Part VI.A.1.a, Part VI.A.1.b, and Part VI.A.1.c, annually, within thirty (30) days of the annual evaluation of the SWMP (Part V.C.), the MS4 Operator must update/modify the focus areas, target audiences, and/or education and outreach topics as recommended by the annual evaluation of the SWMP and document the completion of this requirement in the SWMP Plan.

VI.B Minimum Control Measure 2: Public Involvement / Participation

VI.B.1.a Opportunity Provided for Public Involvement/Participation in Development and Implementation of SWMP

For members of the public interested in developing, implementing, or reviewing the SWMP annually, the SWMP Plan will be presented at a Town Board meeting. It is also available at the Town of Ithaca Public Works Facility from the Stormwater Management Officer. The Draft SWMP and MS4 Annual Report will also be uploaded to the Town of Ithaca website for public review and comment. The Town will also inform the Public of the opportunity to comment on the Draft SWMP and Draft Annual report in our Monthly newsletter. Other program elements described below provide an opportunity for the public to get involved and learn about stormwater management.

Discover Cayuga: The Discover Cayuga offers educational programs to local schools and the general public aboard their boat, the M.V. Haendel. Educational programs offered include:

- Trout in the Classroom – from late October through May of the following year, Discover Cayuga sets up cold-water trout aquariums in participating classrooms throughout Tompkins County. Over 6 months, the students raise the trout, from eggs to fry, in their classroom. They care for the trout, monitor aquarium water quality, and learn about streams. In the spring, the class releases the surviving trout fingerlings into adopted streams in their community.

VI.B.1.b Method Used to Inform Public on Opportunity for their Involvement/Participation in SWMP and How to be Involved (Annually)

The public will be informed of their opportunity for involvement and participation of the SWMP through the Town of Ithaca Website annually.

VI.B.1.c Local Point of Contact to Receive and Respond to Public Concerns Regarding Stormwater Management and Compliance with Permit Requirements

Town Engineer/Stormwater Management Officer, (607) 273-1656, engineering@townithacany.gov

VI.B.2.a Opportunity for Public to Review and Comment on SWMP Plan

Annually, the Town of Ithaca will provide an opportunity for the public to review and comment on the publicly available SWMP Plan. This will be achieved utilizing the methods outlined above in VI.B.1.a

VI.B.2.b.i Opportunity for Public to Review and Comment on Draft Annual Report

Annually, the Town of Ithaca will provide an opportunity for the public to review and comment on the Draft Annual Report which will be posted on our website. The public will have the ability to ask questions and submit comments.

VI.B.2.c.i Summary of Comment Received on SWMP Plan and Draft Annual Report

None at this time.

VI.C Minimum Control Measure 3: Illicit Discharge Detection and Elimination

VI.C.1.a.i Public Contact for the Public to Report Illicit Discharges

Suspected illicit discharges can be filed with the Town Engineer/Stormwater Management Officer either on the Town of Ithaca website or via email at engineering@townithacany.gov. The Town Engineer can also be contacted by calling the Town of Ithaca Public Works Department at (607) 273-1656.

VI.C.1.a.ii Documentation of Report of Illicit Discharges

Within 30 days of an illicit discharge, each report will be documented and included in **Appendix G** with the following information;

- a) Name/contact information of the reporting individual;
- b) Date of the report;
- c) Location of the illicit discharge;
- d) Nature of the illicit discharge;
- e) Follow up actions taken or needed (including response times); and
- f) Inspection outcomes and any enforcement taken.

VI.C.1.c .i Inventory of Monitoring Locations

The monitoring locations used to detect illicit discharges are identified as follows:

- a) MS4 outfalls;
- b) Interconnections; and
- c) Locations where stormwater is conveyed from the MS4 Operator's municipal facility to the MS4 Operator's own MS4.

The Town currently maintains an inventory of the monitoring locations in the SWMP Plan. This can be found in **Appendix G**. The following information is included in the inventory:

- a) Inventory information for MS4 outfalls
 - ID;
 - Prioritization (high or low) (Part VI.C.1.d.) (due 2027);
 - Type of monitoring location (Part VI.C.1.b.);
 - Name of municipal facility, if located at a municipal facility;
 - Receiving waterbody name and class;
 - Land use in drainage area;
 - Type of conveyance (open drainage, closed pipe);
 - Material;
 - Shape;
 - Dimensions;
 - Submerged in water; and
 - Submerged in sediment.
- b) Inventory information for interconnections
 - ID;
 - Prioritization (high or low) (Part VI.C.1.d.) (due 2027);
 - Type of monitoring location (Part VI.C.1.b.);
 - Name of MS4 Operator receiving discharge or private storm system;
 - Name of MS4 Operator's municipal facility, if located at a municipal facility;
 - and

- Receiving waterbody name and class.
- c) Inventory information for locations where stormwater is conveyed from a municipal facility to the MS4 Operator's own MS4
- ID;
 - Prioritization (high or low) (Part VI.C.1.d.)(due 2027);
 - Type of monitoring location (Part VI.C.1.b.);
 - Name of MS4 Operator's municipal facility, if located at a municipal facility; and
 - Receiving waterbody name and class.

Town of Ithaca Outfall Reconnaissance Inventory: The Town of Ithaca currently performs Annual Illicit Discharge Detection and Elimination inspections through the Outfall Reconnaissance Inventory Program. The EPA ORI checklist is the basis for the inspection checklist that is utilized. The checklist has been converted into an electronic application. The Town utilizes ESRI Survey123 to perform the field reconnaissance inventory. The application stores the inspections in a database that corresponds to our Outfall Map. Annually, the inspections that have been conducted are exported to individual pdf documents. These can be provided upon request.

VI.C.1.d .iii Monitoring Location Prioritization Updated

MS4 Operator must update the monitoring location prioritization in the inventory based on information gathered as part of the monitoring location inspection and sampling program. (Due January 2027)

VI.C.1.e Monitoring Locations Inspection and Sampling Program

By January 2026, the MS4 must develop and implement a monitoring locations inspection and sampling program specifying the monitoring locations inspection and sampling procedures. This can be found in **Appendix O**.

VI.C.1.e.i Monitoring Locations Inspection and Sampling Procedures (Due January 2026)

Outfall mapping started in 2007 by the Town of Ithaca. The Town has Additionally Designated Area and therefore the Town has mapped all the outfalls within the Town of Ithaca municipal boundaries using ArcGIS mapping software. The Town has updated our Monitoring Locations to include the new requirements outlined in GP-0-24-001. The Monitoring Locations Inspection and Sampling Procedures can be found under the Monitoring Locations Inspection and Sampling Program in Appendix O.

VI.C.1.e.ii Training Provisions for MS4's Monitoring Location and Sampling Procedures

As new staff are added, training on the monitoring locations inspection and sampling procedures will be given prior to conducting monitoring location inspections and sampling procedures. For existing staff, training on monitoring locations inspection and sampling procedures will be given prior to conducting

monitoring location inspections and sampling and once every 5 years. If monitoring locations inspection and sampling procedures are updated, training on the updates will be given to all staff prior to conducting monitoring location inspections and sampling.

VI.C.1.e.iii Names, Title and Contact Information for Individuals Who Received Monitoring Location and Sampling Procedures Training

The following table will be reviewed and updated annually.

Monitoring Location and Sampling Procedures			
Name	Title	Contact Phone	Email
Justin McNeal	Town Engineer, Stormwater Management Officer	607-273-1656	jmcneal@townithacany.gov
Sam Harris	Civil Engineer	607-273-1656	sharris@townithacany.gov
Emily Rodgers	Civil Engineer	607-273-1656	Erodgers@townithacany.gov
Connor Crandall	Engineering Technician	607-273-1656	ccrandall@townithacany.gov
Madison Clapp	Engineering Technician	607-273-1656	mclapp@townithacany.gov

VI.C.1.e.iv Monitoring Location Inspection and Sampling Procedures Review and Updated

Annually, the monitoring location inspection and sampling procedures (Part VI.C.1.e.i.) will be reviewed and updated based on monitoring location inspection results (e.g., trends, patterns, areas with *illicit discharges*, and common problems).

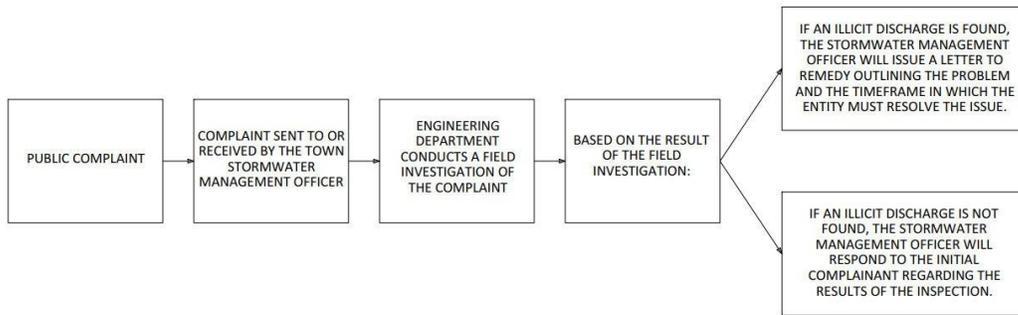
VI.C.2 Illicit Discharge Track Down Program (Due January 2026)

The Illicit Discharge Track Down Program has been developed and implemented to identify the source of illicit discharges and the responsible party.

Responding to Illicit Discharge Complaints County Health Department: Tompkins County Health Department has a system in place to respond to complaints of failed septic systems and conduct complaint investigations related to the County Sanitary Code. Complaints as well as septic system replacements are tracked, and the Code Enforcement Officer (CEO) receives copies of septic replacements and complaint investigations are copied to both the CEO and Town supervisor.

Responding to Illicit Discharge Complaints Town: Currently, the Town system for reporting Illicit Discharges is that the public would report the illicit discharge to the Town Stormwater Officer. The Town would then conduct an investigation in accordance with the Local Laws to verify and resolve the complaint.

Public Complaint Procedure: See the flow chart below:



VI.C.2.a Illicit Discharge Track Down Procedures (Due January 2026)

From the procedures described in Chapter 13 of the *Illicit Discharge Detection and Elimination Manual* (Center for Watershed Protection, 2004), the following method is used:

a) “Follow the Discharge Up” Method

This method is used to narrow down the source of an individual illicit discharge by tracing the flow upstream through the drainage system. This approach is most effective when the discharge originates from a small-diameter outfall (less than 36 inches) and the drainage network is simple and easily navigable. This method involves physically moving upstream from the point of discharge, inspecting manholes, pipes, and junctions to determine where the flow first appears or increases. By sequentially checking upstream structures, investigators can isolate the segment of the system contributing the discharge and identify the likely source area. The follow the discharge up method requires no advance preparation, such as mapping or dye testing, and is typically used during dry weather conditions when flow should not be present. Its simplicity and efficiency make it a practical first step for locating illicit discharges in small or uncomplicated drainage systems.

- i. The following timeframes to initiate illicit discharge track down:
 - a) Within twenty-four (24) hours of discovery, the MS4 Operator must initiate track down procedures for flowing MS4 monitoring locations with obvious illicit discharges;
 - b) Within two (2) hours of discovery, the MS4 Operator must initiate track down procedures for obvious illicit discharges of sanitary wastewater that would affect bathing areas during bathing season, shell fishing areas or public water intakes and report orally or electronically to the Regional Water Engineer and local health department; and
 - c) Within five (5) days of discovery, the MS4 Operator must initiate track down procedures for suspect illicit discharges.

VI.C.2.b Training Provision for the MS4 Operator’s Illicit Discharge Track Down Procedures (Due January 2026)

As new staff are added, training on the MS4 Operator’s illicit discharge track down procedures will be given prior to conducting illicit discharge track downs. For existing staff, training on the MS4 Operator’s

illicit discharge track down procedures will be given prior to conducting illicit discharge track downs and once every five years. If the illicit discharge track down procedures are updated, training on the updates will be given to all staff prior to conducting illicit discharge track downs.

VI.C.2.c Names, Titles and Contact Information for Individuals Who Received Illicit Discharge Track Down Procedures Training (Due January 2026)

The following table will be reviewed and updated annually.

IDDE Staff Training			
Name	Title	Contact Phone	Email
Justin McNeal	Town Engineer, Stormwater Management Officer	607-273-1656	jmcneal@townithacany.gov
Sam Harris	Civil Engineer	607-273-1656	sharris@townithacany.gov
Emily Rodgers	Civil Engineer	607-273-1656	Erodgers@townithacany.gov
Connor Crandall	Engineering Technician	607-273-1656	ccrandall@townithacany.gov
Madison Clapp	Engineering Technician	607-273-1656	mclapp@townithacany.gov

VI.C.2.d Review and Update Illicit Discharge Track Down Procedures

IDDE procedures will be reviewed on an annual basis.

VI.C.3 Illicit Discharge Elimination Program (Due January 2026)

This can be found under **Appendix E**.

VI.C.3.a Illicit Discharge Elimination Procedures

The enforcement procedures for eliminating illicit discharges can be found in the Code of the Town of Ithaca. Once an illicit discharge has been verified the Town will issue a notice to remedy to the party responsible for resolving the illicit discharge.

VI.C.3.b Training Provisions for MS4 Operator’s Illicit Discharge Elimination Procedures

VI.C.3.c Names, Title and Contact Information for Individuals Who Have Received Illicit Discharge Elimination Procedures Training

The following table will be reviewed and updated annually.

IDDE Staff Training			
Name	Title	Contact Phone	Email
Justin McNeal	Town Engineer, Stormwater Management Officer	607-273-1656	jmcneal@townithacany.gov
Sam Harris	Civil Engineer	607-273-1656	sharris@townithacany.gov
Emily Rodgers	Civil Engineer	607-273-1656	Erodgers@townithacany.gov

Connor Crandall	Engineering Technician	607-273-1656	ccrandall@townithacany.gov
Madison Clapp	Engineering Technician	607-273-1656	mclapp@townithacany.gov

VI.C.3.d Illicit Discharge Elimination Procedures Reviewed and Updated (Due January 2026)

Annually by April 1, the illicit discharge procedures will be reviewed and updated.

VI.D Minimum Control Measure 4: Construction Site Stormwater Runoff Control

The Construction Site Stormwater Runoff Control MCM is designed to prevent pollutants from construction related activities, as well as promote the proper planning and installation of post-construction SMPs. The Town of Ithaca Chapter 228, Stormwater Management and Erosion and Sediment Control, requires any project disturbing more than 50 cubic yards or 10,000 square feet to submit a SWPPP Application for review and approval. Construction activities disturbing less than 50 cubic yards or 10,000 square feet will be considered if they have the potential for adversely impacting the waterways. The Town currently has an inventory listing all construction sites that were required to gain coverage through the Construction General Permit. The inventory includes both current construction projects as well as projects that have been completed.

VI.D.2.a Email or Phone Number for the Public to Report Complaints Related to Construction Stormwater Activity

Complaints related to construction stormwater activity should be reported to the Town Engineer/Stormwater Management Officer. Complaints can be sent to via email to engineering@townithacany.gov, or by calling the Department of Public Works office at (607) 273-1656. Complaints can also be filed on our website at the following address: <https://townithacany.gov/contact/>.

All construction related stormwater complaints related to sites with coverage under the CGP can be found in **Appendix H**.

VI.D.2.b Reports of Construction Site Complaints

Construction site complaints will be documented with the following information:

- Date of report,
- Location of construction site,
- Nature of complaint,
- Follow up actions needed or taken,
- Inspection outcomes and any enforcement taken.

VI.D.3 Construction Oversight Program

The Town has developed and implemented a construction oversight program. This can be found in **Appendix I**.

VI.D.3.a Construction Oversight Procedures

The Construction Oversight procedures are listed in the Construction Oversight Program under **Appendix I**. The program includes the following information: when the construction site stormwater control program applies, what types of construction activity require a SWPPP, the procedures for submission of SWPPPs, SWPPP review requirements, pre-construction oversight requirements, construction and inspection requirements, enforcement process/expectations for compliance, and other procedures associated with the control of stormwater runoff from applicable construction activities

VI.D.3.b Training Provision for the MS4 Operator’s Construction Oversight Procedures

As new staff are added, training on the MS4 Operator’s construction oversight procedures will be given prior to conducting any construction oversight activities. For existing staff, training on the MS4 Operator’s construction oversight procedures will be given prior to conducting any construction oversight activities and once every five years. If the construction oversight procedures are updated, training on the updates will be given to all staff prior to conducting construction oversight.

VI.D.3.c Names, Titles, and Contact Information for the Individuals Who Have Received Construction Oversight Procedures Training

Construction Oversight Procedure Staff Training			
Name	Title	Phone	Email
Justin McNeal	Town Engineer, Stormwater Management Officer	607-273-1656	jmcneal@townithacany.gov
Sam Harris	Civil Engineer	607-273-1656	sharris@townithacany.gov
Emily Rodgers	Civil Engineer	607-273-1656	Erodgers@townithacany.gov
Connor Crandall	Engineering Technician	607-273-1656	ccrandall@townithacany.gov
Madison Clapp	Engineering Technician	607-273-1656	mclapp@townithacany.gov

VI.D.3.d Procedures to Ensure those Involved in the Construction Activity Itself Have Received Four (4) Hours of Department Endorsed Training in Proper Erosion and Sediment Control Principles from a SWCD or Other Department Endorsed Entity

The Town of Ithaca reviews a copy of the four hours of department endorsed training in proper erosion and sediment control principles certificates for all “trained contractors” as defined and required by the CGP at project pre-construction meetings for project authorized under the CGP.

All SWPPPs that require MS4 acceptance are reviewed and approved by a registered professional engineer in the state of New York. The Town of Ithaca has a Professional Engineering Services Agreement with Barton & Loguidice, D.P.C. as of October, 6, 2025.

VI.D.3.e The Construction Oversight Procedures were Reviewed and Updated

Annually, the Town of Ithaca will review and update the construction oversight procedures.

VI.D.4.a Inventory of Construction Sites

The Town currently maintains an inventory of all the projects that are authorized under the CGP. The inventory includes the location of the construction site, the owner/operator contact information, receiving waterbody name and class, prioritization (high or low), SPDES Permit identification number, MS4

Acceptance date, current project status, and inspection history. The inventory is updated annually and can be found in **Appendix J**.

VI.D.5.c Construction Site Prioritization

Construction sites listed in the inventory are prioritized within 30 days of becoming active. Annually after the initial prioritization, the Town will update the construction site prioritization in the inventory based on the information gathered as part of the Construction Oversight Program. This will be recorded in the Active Construction General Permit Inventory – **Appendix J**. High priority construction sites include the following:

- a) With a direct conveyance (e.g., channel, ditch, storm sewer) to a surface water of the State that is:
 - i. Listed in Appendix C with silt/sediment, phosphorus, or nitrogen as the POC;
 - ii. Classified as AA-S, AA, or A (mapped in accordance with Part IV.D.1.e.ii.a)); or
 - iii. Classified with a trout (T) or trout spawning (TS) designation (mapped in accordance with Part IV.D.1.e.ii.a));
- b) With greater than five (5) acres of disturbed earth at any one time;
- c) With earth disturbance within one hundred (100) feet of any lake or pond (mapped in accordance with Part IV.D.1.e.ii.b)); and/or
- d) Within fifty (50) feet of any rivers or streams (mapped in accordance with Part IV.D.1.e.ii.b));

VI.D.6.a Individuals Responsible for Reviewing SWPPPs for Acceptance Have Received the Required Training

Staff that are responsible for reviewing SWPPPs for acceptance receive the four hours of department endorsed training in proper erosion and sediment control principles from a Soil & Water Conservation District, or other Department endorsed entity. This training will be completed within three years of the EDC (January 2027) and every three years. All projects requiring a Construction General Permit are reviewed by a Professional Engineer for conformance with NYSDEC requirements.

VI.D.6.d Names, Titles, and Contact Information for the Individuals Who Have Received Four Hours of Department Endorsement Training in Proper Erosion and Sediment Control Principles from a Soil & Water Conservation District, or other Department Endorsed Entity, for Individuals Responsible for Reviewing SWPPPs

Four Hour Proper Erosion and Sediment Control Principles Training			
Name	Title	Contact Phone	Email
Justin McNeal	Town Engineer, Stormwater Management Officer	607-273-1656	jmcneal@townithacany.gov
Sam Harris	Civil Engineer	607-273-1656	sharris@townithacany.gov
Emily Rodgers	Civil Engineer	607-273-1656	Erodgers@townithacany.gov
Connor Crandall	Engineering Technician	607-273-1656	ccrandall@townithacany.gov
Madison Clapp	Engineering Technician	607-273-1656	mclapp@townithacany.gov

VI.D.6.e SWPPP Review Documentation

See **Appendix J** for the list of active construction sites. In the appendix there is a column titled MS4 Acceptance along with a date of when the MS4 review was completed/approved.

VI.D.7 Date and Content of Pre-Construction Inspection/Meeting

Prior to commencement of construction activities, the Town of Ithaca will ensure a pre-construction meeting is conducted. The date and content of the preconstruction inspection/meeting will be documented in the SWMP Plan. The owner/operator, contractors and qualified inspectors must attend the meeting in order to:

- Confirm the approved project has received, or will receive, coverage under the CGP or an individual SPDES permit
- Verify contractors and subcontractors selected by the owner/operator have identified at least one individual that has received four hours of Department endorsed training in proper erosion and sediment control principles.
- Review the construction oversight program and expectations for compliance.

VI.D.8.a Individuals Responsible for Construction Site Inspections Have Received the Required Training

Four hours of Department endorsed training in proper erosion and sediment control principles from a Soil & Water Conservation District, or other Department endorsed entity. This training must be completed, within three years of the EDC (January 2027) and every three years. Document the completion of this requirement in the SWMP Plan.

VI.D.8.d Names, Titles, and Contact Information for the Individuals Who Have Received Four Hours of Departmental Endorsement Training in Proper Erosion and Sediment Control Principles from a Soil & Water Conservation District, or Other Department Endorsed Entity, for Individuals Responsible for Construction Site Inspections

All Town employees in the Engineering Department receive the NYSDEC Endorsed 4-hour Erosion and Sediment Control Training on a 3-year cycle. All employees that will be reviewing SWPPP's will attend a SWPPP review training at least once per permit term (5 years).

Name	Title	Contact Phone	Email
Justin McNeal	Town Engineer, Stormwater Management Officer	607-273-1656	jmcneal@townithacany.gov
Sam Harris	Civil Engineer	607-273-1656	sharris@townithacany.gov
Emily Rodgers	Civil Engineer	607-273-1656	Erodgers@townithacany.gov
Connor Crandall	Engineering Technician	607-273-1656	ccrandall@townithacany.gov
Madison Clapp	Engineering Technician	607-273-1656	mclapp@townithacany.gov

VI.D.8.e Completed Construction Site Inspection Reports

All town conducted inspections will be documented using the Construction Site Inspection Report Form or an equivalent form containing the same information. The completed Construction Site Inspection Reports are available upon request.

VI.D.9.a Completed Final Construction Site Inspection Reports

The Town will ensure a final construction site inspection is conducted and documentation of the final construction site inspection will be maintained in the SWMP Plan under **Appendix N**. The final construction site inspection will be documented using the Construction Site Inspection Form or accept the construction site owner/operators qualified inspector final inspection certification required by the CGP.

VI.E Minimum Control Measure 5: Post-Construction Stormwater Management

The MS4 Operator must develop, implement, and enforce a program to ensure proper operation and maintenance of post construction SMPs for new or redeveloped sites. This MCM is designed to promote the long-term performance of post-construction SMPs in removing pollutants from stormwater runoff.

VI.E.2.d Post Construction Inventory

By January 2029, the following information must be included in the inventory either by using the MS4 operator maintenance records or by verification of maintenance records provided by the owner of the post-construction SMP:

- 1) Street address or tax parcel
- 2) Type
- 3) Receiving waterbody name and class
- 4) Receiving waterbody WI/PWL segment ID
- 5) Date of installation or discovery
- 6) Ownership
- 7) Responsible party for maintenance
- 8) Contract information for party responsible for maintenance
- 9) Location of documentation depicting O&M requirements and legal agreements for post-construction SMP
- 10) Frequency for inspection of post-construction SMP
- 11) Reason for installation
- 12) Date of last inspection
- 13) Inspection results
- 14) Any corrective actions identified and completed.

VI.E.2.e Inventory of Post-Construction SMPs

The Town has created a Post-Construction Practice inventory of all the post construction stormwater practices (public and private) that are located within the Town of Ithaca. All new post-construction stormwater practices are mapped using ArcGIS once the project has been completed. See **Appendix K**.

VI.E.4 Post-Construction Inspection and Maintenance Program

As part of the Final Site Plan approval for all projects that require a Full SPDES Permit with Post-Construction Stormwater Management Practices, owners/applicants are required to enter into a Stormwater Operations and Maintenance Reporting Agreement which requires them to hire a Professional Engineer to conduct annual inspections of each post-construction practice and provide them to the Town for review. Once the Town has reviewed the annual inspections, we issue deficiency letters to the owner/applicant to repair the deficiencies indicated in the inspection.

VI.E.4.a Post-Construction SMP Inspection and Maintenance Procedures

Enforcement actions are taken if an annual inspection is not provided to the Town. Letters will be sent out, then violation notices. All deficiencies will need to be addressed. The Town has provisions to initiate follow up actions within 30 days of post-construction SMP inspection and provisions to initiate enforcement within 60 days of the inspection if follow up actions are not complete.

VI.E.4.a.ii Post-Construction SMP Inspection Documentation

For all Post-Construction SMP's annual inspections are either performed or reviewed by Town Staff. The Post Construction SMP inspection must be submitted using the Post Construction SMP Inspection Checklist or an equivalent form containing the same information. The inspections are then filed and stored on the Town server with the project record.

VI.E.4.b Training Provisions for the MS4 Operator's Post-Construction SMP Inspection and Maintenance Procedures

If new staff are added, training on the MS4 Operator's post-construction SMP inspection and maintenance procedures and procedures outlined in the Department endorsed program will be given prior to conducting any post-construction SMP inspection and maintenance. For existing staff, training on the MS4 Operator's post-construction SMP inspection and maintenance procedures and procedures outlined in the DEC endorsed 4-hour training will be given prior to conducting any post-construction SMP inspection and maintenance and once every five years. If the post-construction SMP inspection and maintenance procedures are updated, training on the updates will be given to all staff prior to conducting post-construction SMP inspection and maintenance.

VI.E.4.c Names, Titles, and Contact Information for the Individuals Who Have Received Post-Construction SMP Inspection and Maintenance Procedures Training

Post- Construction SMP Inspection and Maintenance procedures Training			
Name	Title	Contact Phone	Email
Justin McNeal	Town Engineer, Stormwater Management Officer	607-273-1656	jmcneal@townithacany.gov
Sam Harris	Civil Engineer	607-273-1656	sharris@townithacany.gov
Emily Rodgers	Civil Engineer	607-273-1656	Erodgers@townithacany.gov
Connor Crandall	Engineering Technician	607-273-1656	ccrandall@townithacany.gov

Madison Clapp	Engineering Technician	607-273-1656	mclapp@townithacany.gov
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VI.E.4.d The Post-construction SMP Inspection and Maintenance Procedures were Reviewed and Updated

VI.F Minimum Control Measure 6: Pollution Prevention and Good Housekeeping

The Pollution Prevention / Good Housekeeping (PP/GH) minimum control measure consists of Best Management Practices (BMPs) that focus on training and the prevention or reduction of pollutant runoff from municipal operations.

VI.F1 BMPs Incorporated into the Municipal Facility Program and Municipal Operations Program

By January 2027, the MS4 Operator must incorporate best management practices. BMPs to consider include: minimize exposure, follow preventative maintenance program, spill prevention and response procedure, erosion and sediment controls, manage vegetated areas and open space on municipal property, salt storage piles or pile containing salt, waste, garbage and floating debris, and alternative implementation options.

VI.F.1.a.ii.d) No Exposure Certification(s)

Not applicable.

VI.F2a Municipal Facility Program

By January 2027, the MS4 Operator must develop and implement a municipal facility program.

VI.F2.ai Municipal Facility Procedures

Including: the BMPs incorporated, the high priority municipal facility requirements, low priority municipality requirements

VI.F2.aj Training Provisions for the MS4 Operator’s Municipal Facility Procedures

If new staff are added, training on the MS4 Operator’s municipal facility procedures will be given prior to conducting municipal facility procedures. For existing staff, training on the MS4 Operator’s municipal facility procedures will be given prior to conducting municipal facility procedures and once every five years. If the municipal facility procedures are updated, training on the updates will be given to all staff prior to conducting municipal facility procedures.

Training for Highway Department Staff: All members of the highway staff are required to attend “MSDS” and “Right to Know” training on a yearly basis. The MSDS training covers substances that are used and can be found in Town facilities and how to appropriately handle these substances

and what to do if a spill occurs. The Right to Know training covers the Town’s responsibilities in relation to what information needs to be given to employees and where the information is located.

VI.F.2.a.iii Names, Titles, and Contact Information for the Individuals Who Have Received Municipal Facility Procedures Training

Municipal Facility Procedures Training			
Name	Title	Contact Phone	Email
Justin McNeal	Town Engineer, Stormwater Management Officer	607-273-1656	jmcneal@townithacany.gov
Sam Harris	Civil Engineer	607-273-1656	sharris@townithacany.gov
Emily Rodgers	Civil Engineer	607-273-1656	Erodgers@townithacany.gov
Connor Crandall	Engineering Technician	607-273-1656	ccrandall@townithacany.gov
Madison Clapp	Engineering Technician	607-273-1656	mclapp@townithacany.gov

VI.F.2.a.iv The Municipal Facility Procedures Were Reviewed and Updated

Annually, by April 1, the MS4 Operator must review and update the municipal facility procedures.

VI.F.2.b .i Inventory of Municipal Facilities

Found under Appendix P.

VI.F.2.c .i Within Three Years of the EDC, (January 2027), the MS4 Operator Must Prioritize All Known Municipal Facilities as Follows:

- 1) High Priority- Storage materials, fueling stations, vehicle or equipment maintenance/repair
 - 2) Low Priority- Any municipal facility that does not meet the criteria for a high priority municipal facility.
 - 3) High Priority which qualifies for a no exposure certification are low priority municipal facilities
- Prioritization can be found within the inventory under Appendix P.

VI.F.2.c.iii The Municipal Facility Prioritization was Updated in the Inventory

MS4 Operator must annually update the municipal facility prioritization in the inventory based on information gathered as part of the municipal facility program, including cases where a No Exposure Certification ceases to apply. Completion of this permit requirement must be documented in the SWMP Plan.

VLF2.di Within Five Years of the EDC, (January 2029), the MS4 Operators Must Develop and Implement a Municipal Facility Specific SWPPP for Each High Priority Municipal Facility.

The SWPPP must contain the Stormwater Pollution Prevention Team, General Site Description, summary of potential pollutant sources, spills and releases, site map, Stormwater BMPs, Municipal Facility Assessments.

VLF2.dii c) Completed Comprehensive Site Assessments (e.g., The Completed Municipal Facility/Operation Assessment Forms) for High Priority Municipal Facilities

Completed a minimum of once per permit cycle following the most recent assessment. Must document that: the municipal facility is in compliance with the terms and conditions of this SPDES general permit, deficiencies were identified and all reasonable steps will be taken to minimize any discharge in violation of the permit, which has a reasonable likelihood of adversely affecting human health or the environment, deficiencies were identified and all reasonable steps will be taken to minimize any discharge in violation of the permit, which does not have a reasonable likelihood of adversely affecting human health or the environment.

The Municipal Facility/Operation Assessment Forms have been completed for all Town Facilities.

VI.F.2.e.ii.c) Completed Comprehensive Site Assessments (e.g., The Completed Municipal Facility/Operation Assessment Forms) for Low Priority Municipal Facilities

Completed a minimum of once per permit cycle following the most recent assessment. Must document that: the municipal facility is in compliance with the terms and conditions of this SPDES general permit, deficiencies were identified and all reasonable steps will be taken to minimize any discharge in violation of the permit, which has a reasonable likelihood of adversely affecting human health or the environment, deficiencies were identified and all reasonable steps will be taken to minimize any discharge in violation of the permit, which does not have a reasonable likelihood of adversely affecting human health or the environment.

The Municipal Facility/Operation Assessment Forms have been completed for all Town Facilities.

VLF3a Municipal Operations Program

These include: street and bridge maintenance; winter road maintenance; MS4 maintenance; open space maintenance; solid waste management; new construction and land disturbances; right-of-way maintenance; marine operations; or hydrologic habitat modification. Within 3 years, (January 2027), MS4 operators must develop and implement a municipal operations program

VLF3.ai Municipal Operations Procedures

Salting Operations: The Town of Ithaca has a salt storage barn that is used to keep the material under cover and protect it from the elements.

Asphalt Cold Patch Storage: Cold patch material is stored in the main garage building when onsite to prevent contamination due to runoff. Any contaminated material runoff would flow into our garage drain and then through the oil separator before entering the sanitary sewer system.

Spill Prevention: The Town currently has an Emergency Petroleum Spill Procedure in place for emergency spill events at our facility.

Material Storage at Public Works: There are several larger material stockpiles at the Public Works facility ranging from compost to crushed stone to asphalt millings. The majority of the material storage area flows toward a small stormwater pond. There is curbing along the northern property line to prevent runoff from escaping the site and directing to the stormwater pond.

Pesticides: The Town of Ithaca Parks and Trails Department uses pesticides on some projects. While the pesticides are not being used, they are stored inside of the Public Works Facility in a locked cabinet that is not accessible to the general staff to ensure that the products are not spilled.

Fertilizers: The Town of Ithaca Parks Department uses fertilizer for lawn maintenance activities at our baseball field, the materials are stored in the maintenance building when not in use to protect the material from the weather and reduce nutrient from leaching into the watershed.

VLF3.a.ii Training Provisions for the MS4 Operator's Municipal Operations Procedures

As new staff are added, training on the MS4 Operator’s municipal operations procedures must be given prior to conducting municipal operations procedures. For existing staff, training on the MS4 Operator’s municipal operations procedures must be given prior to conducting municipal operations procedures and once every five years. If the municipal operations procedures are updated, training on the updates must be given to all staff prior to conducting municipal operations procedures.

VLF3.a.iii Names, Titles, and Contact Information for the Individuals Who Have Received Municipal Operations Procedures Training

Municipal Operations Procedures Training			
Name	Title	Contact Phone	Email
Justin McNeal	Town Engineer, Stormwater Management Officer	607-273-1656	jmcneal@townithacany.gov
Sam Harris	Civil Engineer	607-273-1656	sharris@townithacany.gov
Emily Rodgers	Civil Engineer	607-273-1656	Erodgers@townithacany.gov
Connor Crandall	Engineering Technician	607-273-1656	ccrandall@townithacany.gov
Madison Clapp	Engineering Technician	607-273-1656	mclapp@townithacany.gov

VLF3.a.iv The Municipal Operations Procedures Were Reviewed and Updated

Annually, by April 1, the MS4 operator must review and update the municipal operations procedures and document the completion.

IF3c .i Catch Basin Inspection and Maintenance

By January 2027, the MS4 Operator must:

- i. Identify when catch basin inspection is needed with consideration for:
 - Areas with construction activities

- Residential, commercial and industrial areas
 - Recurring or history of issues
 - Confirmed citizen complaints on 3 or more separate occasions in the last 12 months
- ii. Inventory catch basin inspection information including; date of inspection, approximate level of trash, sediment, and/or debris, depth of structure and sump and date of clean out
- iii. Based on inspection results, clean out catch basins within the following timeframes:
- Within six (6) months after the catch basin inspection, catch basins which had trash, sediment, and/or debris exceeding 50% of the depth of the sump as a result of a catch basin inspection must be cleaned out;
 - Within one (1) year after the catch basin inspection, catch basins which had trash, sediment, and/or debris at less than 50% of the depth of the sump as a result of a catch basin inspection must be cleaned out; an

MS4 Operators are not required to clean out catch basins if the catch basins are operating properly and there is no trash, sediment, and/or debris in the catch basin; or the sump depth of the catch basin is less than or equal to two (2) feet.

Catch Basin Inventory and Inspection Program: The Town currently has a storm sewer map in ArcGIS that has all of the town owned catch basins and storm pipes. On an annual basis, the highway department goes around the Town with a vacuum truck to remove the sediment from all of the catch basins within the Town. They record the inspection dates, deficiencies, and sediment quantity removed in our ArcGIS online map.

VI.F.3.d.i Roads, Bridges, Parking Lots, and Right of Way Sweeping Procedures

Within 6 months, MS4 operator must develop and implement procedures for sweeping/cleaning municipal streets, bridges, parking lots, and right of ways owned/operated by the MS4 operator.

Street Sweeping: The Town has started a program to sweep all of the Town roads that have curbing and/or gutter drains on them. The Town currently rents the street sweeper/vacuum truck to perform this work. The Town is currently using ArcGIS Online to track the annual maintenance in the field as the streets are cleaned. See **Appendix L** for our Road Sweeping Inventory.

VIF3.d.ia) Roads, Bridges, Parking Lots, and Right of Ways Have Been Swept

All roads, bridges, parking lots, and right of ways must be swept and/or cleaned once per permit cycle in the spring. This requirement is not applicable to: Uncurbed roads with no catch basins, High-speed limited access highways; or Roads defined as interstates, freeways and expressways, or arterials by the United States Department of Transportation, Federal Highway Administration, Highway Functional Classification Concepts, Criteria and Procedures. See **Appendix L** for a list of the roads that have been swept.

VIF3.d.ib) Roads in Business Districts and Commercially Zoned Areas Have Been Swept

Annually, from April 1 through October 31, roads in business and commercial areas must be swept. This requirement is not applicable to: Uncurbed roads with no catch basins; High-speed limited access highways; or Roads defined as interstates, freeways and expressways, or arterials by the USDOT 2013. See **Appendix L** for a list of the roads that have been swept.