

**CITY OF SARATOGA SPRINGS
SPDES # NYR20A216**

SPDES General Permit for Storm Water Discharges From
Small Municipal Separate Storm Sewers (MS4s), Permit No.
GP-02-02

Stormwater Management Program Annual Report

(March 2007 – March 2008)

May 2008



Engineers • Environmental Scientists • Planners • Landscape Architects

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NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
Phase II SPDES General Permit for

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.

**Stormwater Discharges from Municipal Separate Storm Sewer Systems (MS4s), GP-02-02
 MUNICIPAL COMPLIANCE CERTIFICATION (MCC) FORM**

Regulated MS4: City of Saratoga Springs SPDES Permit Number: NYR20A 216

See information packet for information to help complete this form.

MCC Form for year ending: March 9, 2006 (Year 3) 2007 (Year 4) X 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? X Yes No

Name: Anthony "Skip" Scirocco		Title: Commissioner		Department: Public Works	
Mailing Address:	Street or P.O. Box: 5 Lake Avenue			City: Saratoga Springs	
	County: Saratoga			State: New York	Zip Code: 12866
Phone: (518)587-3550		E-mail Address: skip.scirocco@saratoga-springs.org			

Local Stormwater Public Contact (Required by Minimum Measure 2)

Is information below: 1) new or changed? Yes X No
 2) same as: Owner/Operator

Name: Paul Male, P.E., P.L.S.		Title: City Engineer		Department: Engineering	
Mailing Address:	Street or P.O. Box: 474 Broadway			City: Saratoga Springs	
	County: Saratoga			State: NY	Zip Code: 12866
Phone: (518)587-3550		E-mail Address: paul.male@saratoga-springs.org			

Stormwater Management Program (SWMP) Coordinator (Responsible for implementation/coordination of SWMP)

Is information below: 1) new or changed? Yes No
 2) same as: Owner/Operator X Local Stormwater Public Contact

Name: Paul Male, P.E., P.L.S.		Title: City Engineer		Department: Engineering	
Mailing Address:	Street or P.O. Box: 474 Broadway			City: Saratoga Springs	
	County: Saratoga			State: NY	Zip Code: 12866
Phone: (518)587-3550		E-mail Address: paul.male@saratoga-springs.org			

Annual Report Preparer

Is information below: 1) new or changed? Yes X No
 2) same as: Owner/Operator Local Stormwater Public Contact SWMP Coordinator

Name: Don Fletcher, P.E. Barton and Loguidice, P.C.		Title: Consulting Engineer		Department: Water/Wastewater	
Mailing Address:	Street or P.O. Box: 2 Corporate Plaza, 264 Washington Ave. Extension			City: Albany	
	County: Albany			State: NY	Zip Code: 12203
Phone: (518)218-1801		E-mail Address: dfletcher@bartonandloguidice.com			

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
Lake Lonely	Phosphorus	X	
Dwaas Kill and tribs (1101-0007)	Phosphorus, silt/sediment	X	
Tribes to Lake Lonely (1101-0001)	Phosphorus, D.O., oxygen demand, pathogens	X	
Hudson River (1105-0005)	Mercury	X	

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:

The Stormwater Management Program includes documentation of pollutants of concern and includes details BMPs aimed at complying with Part III B.

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

Cornell Cooperative Extension; T/o Ballston; V/o Ballston Spa; T/o Clifton Park; T/o Greenfield; T/o Halfmoon; T/o Malta; T/o Milton; T/o Moreau; V/o Round Lake; V/o South Glens Falls; T/o Waterford; T/o Wilton

List MS4 Partners with Planned Legally Binding Agreements or Contracts

List MS4 Partners with Other Agreements in Place

Saratoga County Soil and Water Conservation District

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:

In addition, the City of Saratoga Springs expanded all MS4 regulations and requirements to the entire City rather than just the designated MS4 boundary.

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:
Currently, the Intermunicipal SWMP receives funds through a 2003 EPF/WQIP Grant. The Program will continue to receive 2005 EPF/WQIP Grant funding through December 2008. At this time, however, no long-term funding mechanisms or budget items specifically designated for Stormwater Management Program activities are planned or have been authorized by the County Board of Supervisors.

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?

2005 NYS-DEC EPF/WQIP Grant; 10/06-12/31/08; \$248,000

Explain:
Through a partnership with Cornell Cooperative Extension, the above grant was awarded to the 16 MS4-permittees and the Saratoga County Intermunicipal Stormwater Management Program.

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 Explain 'no' / 'N/A' answer:	<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
IV.C.2.	Public Involvement / Participation Explain 'no' / 'N/A' answer:	<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
IV.C.3.	Illicit Discharge Detection and Elimination Explain 'no' / 'N/A' answer: The training session targeting building inspectors, code enforcement officers, engineering, and other professional departments did not occur.	<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
IV.C.4.	Construction Site Stormwater Runoff Control Explain 'no' / 'N/A' answer:	<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
IV.C.5.	Post-Construction Stormwater Management Explain 'no' / 'N/A' answer:	<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
IV.C.6.	Pollution Prevention / Good Housekeeping for Municipal Operations Explain 'no' / 'N/A' answer: The training session targeting building inspectors, code enforcement officers, engineering, and other professional departments did not occur.	<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

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 J Scirocco Title: Commissioner DPW.

Signature: Anthony J Scirocco Date: 5/30/08

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: City of Saratoga Springs **SPDES Permit Number:** NYR20A 216

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

Information about how to complete the following 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"> Explain the program, including activities and materials used Identify the personnel or outside organization conducting the activity. 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>
<ul style="list-style-type: none"> The City is an active participant in the Saratoga County Intermunicipal Stormwater Management Program. (See attached addendum) The City's stormwater webpage was updated and includes: <ul style="list-style-type: none"> Main page description of program, including minimum control measures (http://www.saratoga-springs.org/docs/bpwebsite.asp) Contact SWMP Coordinator <ul style="list-style-type: none"> Paul Male Report a Pollution Problem <ul style="list-style-type: none"> Al Flick SPDES General Permit <ul style="list-style-type: none"> Needs updating per new general permit for Year 6 2007 Annual Report Local Laws Outfall Location Map Video - "After The Storm" <ul style="list-style-type: none"> Viewable online Upcoming Events Links To Related Sites 	<ul style="list-style-type: none"> Year 5 and ongoing Year 5: The stormwater webpage had 188 hits since it was updated on December 28, 2007 Year 6: The stormwater webpage will be updated as needed and will include notification of the Annual Report presentation (in addition to the online agenda) Links on the Stormwater Webpage: <ul style="list-style-type: none"> Saratoga County Intermunicipal Stormwater Management Program: http://www.saratogastormwater.org/contact-saratoga-county-stormwater-management.htm Capital District Regional Planning Commission: http://cdrpc.net/WQ/waterquality.html DEC (Division of Water; Stormwater Management, Permits, Forms: http://www.dec.state.ny.us/website/dow/toolbox/ms4toolbox/ms4_toolbox.html) United States Environmental Protection Agency: http://c/pub.epa.gov/npdes/home.cfm?program_id=6 EPA For kids:

<p>The City developed an informative flyer that is given to residents who visit the Public Works office to purchase compost, leaf/yard waste bags, etc. The same flyer is available at the front desks of the Department of Public Works, and Department of Engineering. They also made them available at the Environmental Expo at the City Center.</p>	<ul style="list-style-type: none"> o http://www.epa.gov/safe-water/kids/index.html o SMRC (Stormwater Managers Resource Center): http://www.stormwatercenter.net/ o Center for Watershed Protection: http://www.cwp.org/ o NEMO (Non-Point Education for Municipal Officials): http://nemo.uconn.edu/
<ul style="list-style-type: none"> • The year 4 Annual Report was successfully presented to the City Council at a public meeting. The City Council meeting agenda is posted on a large message board at the main entrance to City Hall, and also appears on the City's website. An announcement of the Annual Report presentation is also noted under "Upcoming Events" on the City's stormwater webpage, and will be posted under Public Notices in the Saratogian newspaper 	<ul style="list-style-type: none"> • Year 5 (April 12 release date) and ongoing • Initial printing was 500 flyers • Environmental Expo dates: 4/14/07-4/15/07
<ul style="list-style-type: none"> • The Grease Trap Program described in the Year 4 report continued. As new businesses come in to the inner district they will be addressed. A database of businesses with Grease Traps is on file at the City Engineering Office. 	<ul style="list-style-type: none"> • Public presentation was in May, 15 2007. • May 20, Year 6: Annual Report for Year 5 will be presented
<ul style="list-style-type: none"> • Water bills included an informational stormwater section. The sections discussed sump pump discharges, water conservation for landscaping purposes, sparingly using fertilizers, pesticides, and herbicides, keeping hazardous household wastes out of the storm sewers, visiting the City's stormwater website, keeping street drains clear of debris and ice, and sweeping debris (leaves, dirt, etc.) from the curb line. 	<ul style="list-style-type: none"> • Year 5 and ongoing
<ul style="list-style-type: none"> • After the Storm was aired on Public Access and is posted on the City's stormwater webpage. Prior to the December airing on Channel 18, an ad was placed in the Saratogian on December 8, 9, and 10. 	<ul style="list-style-type: none"> • Year 5: Mailed July and October of 2007 and January of 2008. Each mailing discussed different stormwater issues and ways residents can help out and was mailed to 9,000 City residents each time • Year 6: Will continue to include stormwater section in the utility bill • Year 5: Aired on November 17, 19, 20, 27, and 28 and December 17
<ul style="list-style-type: none"> • The repository was relocated to the main entrance of the City Engineer's, Planning, and Building Department Offices. This area receives high exposure to individuals intending to conduct business within those departments. A copy of the Stormwater Management Program document is kept in the City's repository and educational materials are provided for the public in the front lobby of the Public Works Office. A sign-out sheet was created for any person who wishes to borrow documents from the repository. 	<ul style="list-style-type: none"> • Year 5: Became available in January of 2008 • Less than 5 sign-out requests were made since December, 2007 • Documents available for review/sign-out: <ul style="list-style-type: none"> o Stormwater Regulations and the Construction Industry o New Requirements for Small Construction Projects o Make Your Home the Solution to Stormwater Pollution! o After the Storm - A Citizen's Guide to Understanding Stormwater

<ul style="list-style-type: none"> Through the Saratoga County Intermunicipal Program, the City will take place in the second annual Saratoga Springs Environmental Expo. Poster boards will be displayed that will encourage residents to log onto the City's Stormwater Pollution Prevention webpage to learn about MS4 and SWPPP requirements and to report cases of stormwater pollution to the Public Works Office. The City will also provide entry forms for Expo attendees (who are also City residents) to enter to win a free storm drain decal kit for use in their neighborhood. 	<ul style="list-style-type: none"> Stormwater Runoff: From My Yard to Our Streams Stream Processes - A Guide to Living in Harmony with Streams Stormwater Management Program Annual Report - May 2007 Illicit Discharge Detection and Elimination Manual NYS Standards and Specifications for Erosion and Sediment Control Be Part of the Solution to Storm Water Pollution "Where Can I Turn for Help?" "Planning a New Construction Project or Development?"
<ul style="list-style-type: none"> The City Planning and Zoning Boards will be scheduled for MS4 training at a regularly scheduled meeting in June or July of 2008. The presentation will highlight the objectives of the Stormwater Management Program particularly as it relates to the project review process. Discussion will also make note of the new Local Law relating to development and construction. The City also plans to conduct a public MS4 education session at the Saratoga Springs Public Library. 	<ul style="list-style-type: none"> April 25-27, Year 6 June or July of Year 6: Education of Planning and Zoning Boards Summer/Fall of Year 6: Public MS4 session at the Saratoga Springs Public Library
<ul style="list-style-type: none"> Contractors are required to attend a pre-construction meeting with the City Engineer during which time they're informed of stormwater requirements. They also are provided written materials that provide further education about stormwater pollution. 	<ul style="list-style-type: none"> Year 5 and Ongoing
<ul style="list-style-type: none"> "City Council Adopts Storm Sewer Measure" was the front page article of the Saratogian "New City Council Convenes: was the front page article of the Saratogian. This was the meeting at which the Erosion and Sediment Control Local Law and required amendments to existing laws were accepted. "Local Law Aims to Protect the Environment" was in the Local News 	<ul style="list-style-type: none"> December 8, Year 5 January 3, Year 5 January 12, Year 5

<p>section of the Saratogian</p> <ul style="list-style-type: none"> The City evaluated their Public Outreach and Education Program and more formally developed measures for future implementation. These are in the comprehensive Stormwater Management Program Best Management Practices document. These include facilitator information, BMP updates, topics for implementation, how to evaluate the effectiveness, and what to report on, as well as resources and an example stormwater related classroom project. Examples of main topics included in the program are: Classroom Education on Stormwater, Stormwater Outreach for Commercial Businesses, Using the Media, Education Displays, Pamphlets, Booklets, and Bill Inserts, Promotional Giveaways, etc. 	<ul style="list-style-type: none"> December, Year 5: Sixteen (16) topics were covered, and 39 BMPs were evaluated for inclusion into the document
<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>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>	

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>	<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"> 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. 	
<ul style="list-style-type: none"> The City is an active participant in the Saratoga County Intermunicipal Stormwater Management Program. (See attached addendum) 	<ul style="list-style-type: none"> Year 5 and ongoing
<ul style="list-style-type: none"> Pamphlets explaining stormwater management and State requirements related to construction projects are available at the Public Works and Engineering Offices. They are also provided to developers applying for permits from the City. 	<ul style="list-style-type: none"> Year 5 and ongoing.
<ul style="list-style-type: none"> The City and a local middle school biology class from the Waldorf School ("Roots and Shoots" environmental club: http://www.rootsandshoots.org/) continued to work together on a public stormwater awareness campaign involving the placement of curb markers adjacent to storm drains. 	<ul style="list-style-type: none"> Year 5: 150 curb markers Ongoing: The City will continue to work with Roots and Shoots
<ul style="list-style-type: none"> In an effort to encourage public stormwater stewardship, the City will "raffle off" five (5) free storm drain decal kits to City residents who attend the 2nd Annual Saratoga Springs Environmental Expo. This promotion aims at preventing stormwater pollution at storm drains located in residential neighborhoods and raising awareness in the local area. 	<ul style="list-style-type: none"> April, Year 6
<ul style="list-style-type: none"> Public participation will be sought for a waterside Clean-Up Day to be scheduled this summer of 2008. Volunteers can enlist for the event on the City's stormwater webpage. In addition, sign-up sheets will be posted at the City Hall message board, the MS4 Repository, and outside the Council Meeting Room which is home to most City government meetings. 	<ul style="list-style-type: none"> Summer, Year 6: Waterside Clean-Up Day
<ul style="list-style-type: none"> The City evaluated their Public Involvement and Participation program and more formally developed measures for future implementation. These are in the comprehensive Stormwater Management Program Best Management Practices document. These include facilitator information, BMP updates, topics for implementation, how to evaluate the effectiveness, and what to report on, as well as resources. Examples of main topics included in the program are: Adopt-A-Stream, Storm Drain Marking, Volunteer Monitoring, Wetland Plantings, Attitude Surveys, etc. 	<ul style="list-style-type: none"> December, Year 5: Six (6) topics were covered, and 21 BMPs were evaluated for inclusion into the document

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. *Describe procedures below and state the methods used to publicize the AR public presentation.*

- The Annual Report is presented at the City Council meeting, and the agenda is posted on a large message board at the main entrance to City Hall, and also appears on the City's website. An announcement of the Annual Report presentation is also noted under "Upcoming Events" on the City's stormwater webpage, and will be posted under Public Notices in the Saratogian newspaper. The Agenda can be found on the following website: <http://www.saratoga-springs.org/docs/bpwebsite.asp>

Permit Reference IV.C.2.e: Public presentation of; **f:** summary of comments received on; and **g:** intended response to comments on the SWMPAR.

Summarize attendance at the public presentation of the Annual Report. Include number of attendees and who was represented: Scott Johnson, Mayor; John Franck, Commissioner of Accounts; Ken Ivins, Commissioner of Finance; Ron Kim, Commissioner of DPS; Anthony Scirocco, Commissioner of DPW; Matthew Veitch, Supervisor; Joanne Yepsen, Supervisor; Michele Boxley, Deputy Commissioner, Accounts; Patrick Design, Deputy Commissioner, DPW; Eileen Finneran, Deputy Commissioner, DPS; Kate Jarosh, Deputy Commissioner, Finance; Shauna Sutton, Deputy Mayor; Joe Scala, City Attorney, Approximately 10 City Residents.

Comments on Annual Report Meeting	Date of Annual Report Meeting:	Approximate Date of Meeting
<input checked="" type="checkbox"/> No public comments received on Annual Report.		Next Year:
<input type="checkbox"/> Comments received. Attach summary of comments and intended responses.	<ul style="list-style-type: none"> • May 20, 2008 	<ul style="list-style-type: none"> • May 19, 2009

Additional Techniques	Describe Measurable Goals and Results (when applicable)
<ul style="list-style-type: none"> • Posted online in the City Council's Agenda • Posted on the City's Stormwater Management Program Webpage 	<i>Indicate: Date Completed, Ongoing Task, or Scheduled Date (for next years activities)</i>

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 City extensively focused their efforts on self-audits and identifying/modifying municipal BMPs, IDDE and outfall inspections, and developing programs for each MCM. These are all collected in one document entitled "Stormwater Management Program". They also heavily focused on outfall inspection and needed website updates.

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.

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.

- Explain the activities and procedures used to meet this requirement this year and planned for next year.
- Revise as procedures are updated.
- Identify personnel or outside organization conducting the activities

- Public calls and complaints trigger investigations of suspected illicit discharges. In Year 5, two construction jobs were shut down due to illicit discharges. The City does not allow them to commence until controls have been established and any silt/debris has been cleaned.
- The City evaluated their Illicit Discharge Detection and Elimination program and developed formal measures for future implementation. These are in the comprehensive Stormwater Management Program Best Management Practices document. These include facilitator information, BMP updates, training documentation and opportunities, topics for implementation, how to evaluate the effectiveness, and what to report on, as well as resources. The program was developed as follows:

Developing the IDDE Program

Description:

Stormwater regulations define an "illicit discharge" as "any discharge to a municipal separate storm sewer that is not composed entirely of stormwater" (except discharges resulting from fire fighting activities and a few other categories). Common sources of non-stormwater, dry weather discharges in urban areas include apartments and homes, car washes, restaurants, airports, landfills, and gas stations, to name but a few. These so called "generating sites" discharge sanitary wastewater, septic system effluent, vehicle wash water, washdown from grease traps, motor oil, antifreeze, gasoline and fuel spills, among other substances. Although these illicit discharges can enter the storm drain system in various ways, they generally result from either direct connections (e.g., wastewater piping

Describe Measurable Goals and Results (when applicable)

Indicate: Date Completed, Ongoing Task, or Scheduled Date (for next years activities)

- Example measurable goals: number of illicit discharges detected; number of illicit discharges eliminated.

• Year 5:

- Summer 2007: A City employee contacted stormwater personnel to report house paint on a catch basin grate and inside the structure. A field visit verified that several cans of paint were stacked on the grassy area between the curb and sidewalk. Lids were loose and paint spilled out of overturned cans. Inspector spoke with the tenant and the tenant explained that it was left for trash removal by the previous tenant. She provided the Inspector with the phone number for the building Owner. The Inspector notified the Owner and instructed him to remove and properly dispose of the cans. The following day the paint cans were removed.
- Summer 2007: A City employee contacted stormwater personnel to report a sewerage odor and possible seepage in front of a house (Note: there is no public sanitary sewer on this road). Upon inspection, no evidence of sewerage was detected and it was assumed to have been a malfunctioning septic system that has since been rectified.
- July 24, 2007: A City employee contacted stormwater personnel to report an individual dumping liquid from a bucket into a catch basin. The Inspector visited the site and inspected several catch basins in the vicinity of the alleged incident. No evidence of an illicit discharge was found.
- In all three instances, City employees knew to

either mistakenly or deliberately connected to the storm drains) or indirect connections (e.g., infiltration into the storm drain system, spills, or "midnight dumping"). Illicit discharges can be further divided into those discharging continuously and those discharging intermittently.

contact Al Flick. This is a testament to the educational efforts made by the City and it will be a continued goal to enhance awareness among City employees.

- Year 5: BMP document was created and the IDDE program was evaluated and refined for inclusion into this document.

Measures to Implement

- Develop Outfall Map and Record:
 - The City identified existing stormwater outfalls using GPS technology and assigned coordinates to each. The outfalls appear on a map entitled "Map of Municipal Stormwater Outfalls – City of Saratoga Springs, NY". Currently, 115 outfall locations have been identified, 61 of which were inspected in the winter of 2007. Completed inspection forms are on file in the City Engineers Office and include information regarding outfall location, surrounding land use, outfall/pipe characteristics, and flow conditions and are accompanied by digital photographs.

- Quantify Outfalls
 - As of January 2008, all existing stormwater outfalls have been inventoried totaling one hundred and fifteen (115) separate locations. Sixty-one (61) of these are on property of the City of Saratoga Springs. The remaining outfalls, comprised mostly of discharges to a detention pond, are situate on private property and are as such are to be owned and maintained by others.

The City will continue to quantify outfalls as they are further identified and added to the map.

- Determine Sub-areas
 - Outfall locations will be analyzed with respect to land use and zoning, storm drainage characteristics, potential for pollutants, and other important factors in order to identify "priority areas" for future monitoring. The City Zoning Map will be used as a tool to further identify potential sub-areas. A hierarchy will be established and the sub-areas will be illustrated on the Outfall Map.

- Monitor Outfalls:

- The sixty-one (61) outfall locations that are owned and maintained by the City of Saratoga Springs were inspected in the winter of 2007. Inspection reports, maps, and other record information from outfall monitoring are, and will continue to be, maintained at the office of the City Engineer. These records will include follow-up inspections, maintenance work, and any related outfall information.

Outfalls under private ownership were also identified and respective owners were notified, in writing, of their responsibilities relative to illicit discharges and stormwater management practice and outfall maintenance. The City will monitor the remaining 54 outfalls and continue to add outfalls to the map as they are identified. In addition, owners of new privately owned outfalls will be similarly notified of their responsibilities and potential penalization for violations.

Future inspections of all outfalls will be conducted at 10% (minimum) per year. These inspections will be based on priority areas identified in the determination of sub-areas.

- File Summary Reports

- General case information pertaining to each illicit discharge complaint will be documented on a "Findings and Remediation Report". The Report will detail the circumstances that lead to the investigation as well as the procedures and techniques used to investigate the matter. It will also describe the results of the investigation and the actions taken to repair or remediate the situation. Photographs will also be included and all of this information will be filed in the City Engineers Office.

The City currently employs this method and will continue to do so as issues arise.

- Test Suspect Outfalls

- When potential issues are observed during outfall monitoring, sampling and testing will be conducted as needed. For example, samples may be drawn from the suspect outfall(s) and submitted to a licensed lab for testing and analysis. With those results, potential causes will be determined and tracked in order to remedy the illicit discharge or connection.

The City has successfully identified and tracked illicit discharges to their source, and will continue to do as situations arise. Files of each issue, including resolutions, will be kept at the City Engineer's office.

- Sample Outfalls

- The City will incorporate a sampling program to annually test outfalls at a minimum of 10% of all identified outfall locations, with particular attention given to "hot spots" such as commercial and industrial zones, older neighborhoods, and areas experiencing repeated complaints or problems.

Samples will be obtained during dry-weather conditions, and flow characteristics such as odor, color, turbidity, and floatables will be recorded. Testing parameters will be determined based on factors such as the pollutant of concern, surrounding land use, suspected pollutants, and other identifiable variables.

Test results and general sampling event observations will be recorded and maintained in the City Engineers Office.

- Map & Track Illicit Discharges:

- The City re-mapped both the storm and sanitary sewer systems of the Inner District using GPS technology and AutoCAD software. Over 1,450 manholes were located, each having been tagged with a specific identification number for tracking purposes. This digital map provides a key element in the IDDE program and serves as a base for additional data and overlays. While the MS4 program does not currently require all stormwater conveyances to be mapped, the

City will continue to do so as needed to further enable ease of tracking.

Illicit discharges will be inputted to the map in order to identify "hot spots" or pollution patterns. Outfall locations will also be incorporated onto the base map to assist in tracking.

To improve manageability, the mapped storm system was divided into drainage areas. These areas have been delineated and mapped to enable IDDE-related work and allow a focus on smaller segments of the storm system. The discharge point for each drainage area has been tagged on the map and will provide a starting point for many IDDE-related activities such as manhole inspections and water quality sampling.

An Engineering Technician within the Department of Public Works is assigned to spearhead investigations into illicit discharges. Additional assistance from the Department's field personnel is readily available when needed. In addition to GPS equipment and mapping software, the City also acquired a closed-circuit television/videotape unit, a smoke testing machine, dye testing materials, and other equipment to carry out an investigation. These resources are extensively used to identify the source of an illicit discharge.

- Inspect Manholes:
 - Beginning in May 2003, the Public Works Department systematically inspected all storm sewer manholes situated in the City's Inner District. Inspection forms were completed in the field and the information was then transferred to a computer management database (Microsoft Access) for future GIS application. Both are maintained in the City Engineers Office.

Manhole inspections include an evaluation of structural and performance characteristics, and also indicate any evidence (i.e. odors, grey water) of an illicit discharge. This evidence automatically triggers the investigation process and the filing of a