#### **PUTNAM VALLEY CENTRAL SCHOOL DISTRICT**

# STORMWATER MANAGEMENT PROGRAM PLAN

OCTOBER 2025 MS4 PERMIT ID NO. NYR20A518

146 PEEKSKILL HOLLOW ROAD PUTNAM VALLEY, NY 10579







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#### 1 INTRODUCTION

#### 1.1 REGULATORY REQUIREMENTS

The Putnam Valley Central School District School District (the District) has prepared this Stormwater Management Program (SWMP) Plan to comply with the New York State Department of Environmental Conservation (NYSDEC) Stormwater Pollutant Discharge Elimination System (SPDES) General Permit for Stormwater Discharges from Municipal Separate Stormwater Sewer Systems (MS4s), Permit No. GP-0-24-001 (the Permit), which was made effective January 3, 2024. The previous iteration of SWMP dated November 2015, developed under the former NYSDEC SPDES General Permit GP-0-15-003, has undergone significant revisions. This updated SWMP Plan will incorporate modifications to the District's existing SWMP and address new regulatory requirements. The SWMP Plan will be reassessed annually and updated as needed to improve its effectiveness, monitor progress, and account for any changes in the regulations and guidance provided by NYSDEC.

The District is considered a non-traditional use entity under the SPDES General Permit (NAICS Code 611110: Elementary and Secondary Schools). A non-traditional MS4 is defined as state, federal, county and other publicly owned properties such as state university campuses, prisons, office complexes, hospitals, military installations public housing authorities, school and other special districts.

MS4 Operators are required to reduce pollutants in stormwater to the maximum extent practicable to protect water quality. The permit regulations specify that compliance with the maximum extent practicable requirement can be attained by developing a SWMP plan that addresses the six minimum control measures (MCMs) that have been defined by the United States Environmental Protection Agency (USEPA). The purpose of this SWMP Plan is to outline the specific goals and measures the District intends to implement to meet each of the six MCMs. The MCMs, when implemented together, are expected to reduce pollutants discharged into receiving water bodies. They are as follows:

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

General permits outline specific requirements but allow flexibility to develop a tailored stormwater program that addresses an MS4's unique water quality issues and system needs.

The District electronically filed a Notice of Intent (eNOI) in 2024 for continuing coverage under MS4 Permit ID No. NYR20A518 in order to gain coverage under the new SPDES General Permit and demonstrate adherence to the new permit regulations. The District is currently not working with other MS4 Operators to implement the Stormwater Management Program. Additionally, the District does not have any facilities that need to obtain Multi-Sector General Permit (MSGP) coverage.

#### 1.2 STORMWATER POLLUTANTS

Stormwater pollution refers to the contamination of natural waterbodies, such as rivers, lakes, and streams. Stormwater or melted snow runoff can carry various pollutants from impervious surfaces through stormwater drainage systems and into local waterbodies. Polluted stormwater has the potential to cause detrimental effects on both the environment and public health. Common sources of stormwater pollution include urban runoff, construction sites, industrial discharges, and agricultural runoff. Commonly discharged pollutants carried by stormwater runoff include:

- Pathogens (disease-causing microorganisms, such as bacteria and viruses) from overloaded septic fields, animal waste, and organic matter;
- Nitrogen, phosphorous, and other nutrients found in fertilizers and detergents;
- Oil and grease from automotive leaks/spills and the improper disposal of used oil and automotive products into storm drains;
- Toxic inorganic and organic compounds discharged into storm drains (pesticides, herbicides, detergents, and other chemicals);
- Chlorides found in deicing materials applied during winter months; and,
- Silt and sediment from construction activities, agriculture, landscape, and poorly maintained roadways.

Polluted stormwater can harm aquatic ecosystems by reducing water quality, disrupting the habitat, and endangering the aquatic life. It can lead to the development of algal blooms, oxygen depletion, and habitat degradation.

Polluted stormwater can also pose health risks to humans, particularly when it infiltrates groundwater or contaminates drinking water sources. It may carry pathogens, chemicals, and toxins that can lead to waterborne diseases and adverse health effects.

#### 2 MS4 OPERATOR INFORMATION

#### 2.1 STAFFING/ORGANIZATIONAL CHART

An organizational chart of MS4 Operator personnel is provided in Appendix A. This includes the Ranking Official (District Superintendent), Stormwater Program Coordinator (Director of Facilities), and other associated staff.

#### **RANKING OFFICIAL**

The District's Ranking Official is the Superintendent. The Superintendent is responsible for funding/maintaining the stormwater program, and assigning a Stormwater Program Coordinator, who in turn is responsible for keeping the Superintendent apprised of the current and ongoing steps implemented by the District to comply with the stormwater permit. The Superintendent is responsible for signing/certifying all notices and reports required by the SPDES General Permit.

#### PROGRAM COORDINATOR

The Stormwater Program Coordinator is responsible for overseeing the development, implementation, and enforcement of the Stormwater Management Program; and, ensuring all permit compliance items shall be implemented by Qualified Professionals. Additionally, the Stormwater Program Coordinator coordinates all elements of the SWMP Plan, including the Annual Report, staffing, scheduling, and budgeting to ensure compliance with the SPDES General Permit.

#### **OPERATIONS & MAINTENANCE STAFF**

Operations and maintenance (O&M) staff are responsible for the maintenance of school buildings and their surrounding grounds and fields. They play a critical role in the District's construction projects, and work closely with the Program Coordinator and construction engineers/contractors to ensure that construction projects proceed in accordance with the SWMP, the approved design, and are in compliance with all applicable state and federal regulations.

#### STORMWATER CONSULTANT

WSP USA Inc. (WSP) is the District's environmental consultant. WSP is actively engaged in the following:

- Assisting the District in the execution of the SWMP Plan;
- Conduct discussions and training with the District's stormwater program team regarding permit requirements/MCMs and updates, and Best Management Practices (BMPs);
- Preparation of newsletters for student involvement and community outreach;
- Conducting outfall inspections; and,
- Preparation of the permit submittals/notices and Annual Reports.

#### 2.2 FACILITY INFORMATION

The District includes the following campuses, as indicated in the MS4 eNOI:

Facility Name	Address	Approximate Acreage
Putnam Valley High School	146 Peekskill Hollow Road Putnam Valley 10579	40
Putnam Valley Middle School	142 Peekskill Hollow Road Putnam Valley 10579	(combined campus)

#### 2.3 WATERBODY/DISCHARGE INFORMATION

The District does not discharge stormwater into any of the impaired waters listed in the SPDES General Permit (Appendix C: List of Impaired Waters or Table 3: Approved TMDL Watersheds with MS4 Contribution).

Stormwater drainage from the combined High School/Middle School campus consists of surface flow discharges to catch basins located throughout the campus. The catch basins are discharge to outfalls throughout the campus.

#### 3 MINIMUM CONTROL MEASURES

MS4 operators are required to adhere to and implement the six USEPA MCMs, as defined in this SMWP Plan, to prevent pollution from stormwater runoff and preserve natural areas in and around the MS4 area. The following subsections describe the six MCMs and the District's method for implementation.

#### 3.1 MCM 1: PUBLIC EDUCATION AND OUTREACH PROGRAM

A Public Education and Outreach Program has been developed to inform the public about the impacts of stormwater runoff on water quality, the general sources of stormwater pollutants, and steps the general public can take to reduce pollutants in stormwater runoff. The public, as defined by the Permit, includes school employees/faculty, students, attendees/visitors, and contractors working at the school.

A SWMP web page has been developed on the District's website as a repository of publicly available SWMP documents. It can be found at the following link:

https://pvcsd.org/index.php/district/stormwater-management-program/

The following measures will be completed annually, at a minimum, or as needed to ensure the successful implementation of a public education and outreach program.

#### **STAFF TRAINING**

Training sessions will be held in person or by remote conference with school staff designated with MS4 responsibilities by the Stormwater Program Coordinator. Training topics include, but are not limited to, MS4 permit requirements, SWMP Plans, MCMs/BMPs, illicit discharge detection and elimination, erosion and sediment control practices, and post-construction stormwater management practices. The MS4 staff list will be documented at each session and the District's organizational structure (Appendix A) will be updated if needed.

#### **NEWSLETTERS**

Newsletters will be posted to the District website that provides general information about stormwater topics and guidance for reducing negative impacts to stormwater and surrounding waterbodies. A key focus of the newsletters will be guidance for identifying pollutant/illicit discharges to the District's stormwater drainage system.

#### 3.2 MCM 2: PUBLIC INVOLVEMENT/PARTICIPATION

The Public Involvement and Participation Program ensures that the public is encouraged to be involved with the SWMP, and has opportunities to review and provide feedback on the program

elements and its implementation. The SWMP Plan and Annual Reports will be posted to the District's website.

The District has identified the following point of contact to receive and respond to public concerns regarding stormwater management and compliance with permit requirements:

David Spittal, Stormwater Program Coordinator (845) 528-8143 ext. 1323 <a href="mailto:dspittal@pvcsd.com">dspittal@pvcsd.com</a>

The District's SWMP web page provides the public with contact information and publicly available documents to encourage public involvement and participation with the SWMP. It can be found at the following link:

#### https://pvcsd.org/index.php/district/stormwater-management-program/

The public outreach newsletters posted to the District's website will each include the following statement:

The community is encouraged to be involved with the Putnam Valley Central School District Stormwater Management Program (SWMP). For information, please contact the Stormwater Program Coordinator David Spittal at dspittal@pvcsd.com. SWMP documents and Annual Reports are available for public review and comment on the District's website: https://pvcsd.org/index.php/district/stormwater-management-program/

#### 3.3 MCM 3: ILLICIT DISCHARGE DETECTION AND ELIMINATION

An Illicit Discharge Detection and Elimination program has been developed to identify unauthorized discharges at the District's outfall locations, promptly determine the source, stop the discharge, and take necessary actions to prevent future unauthorized discharges into the MS4 from the source area.

Illicit discharges are direct or indirect non-stormwater discharges to the MS4 that are not entirely composed of stormwater and include, but are not limited to, non-permitted sanitary sewage, garage drain effluent, and waste motor oil. An illicit discharge could also be any other non-permitted discharge which the MS4 Operator has determined to be a substantial contributor of pollutants to the MS4.

#### **ILLICIT DISCHARGE DETECTION**

The District operations and maintenance staff and groundskeepers will be trained to inspect outfall locations for illicit discharges during normal business operations. As part of this program, the District will designate high priority and low priority monitoring locations and ensure that all locations are accessible. In the event an illicit discharge is observed, the Program Coordinator and District's environmental consultant will be notified.

Outfall inspections will be conducted annually by the District's environmental consultant for illicit discharge detection and to document the outfall condition. The inspections will occur under dry weather conditions. The outfall characteristics will be confirmed, the condition will be

documented, and the stormwater flow and receiving water body will be inspected for any evidence of illicit discharge. Inspections will be documented using the Monitoring Locations Inspection and Sampling Field Sheet, which is included in Appendix B.

The program will include training on the District's inspection and sampling procedures whenever new staff is added, procedures are updated, or every five years. The inspection and sampling procedures, monitoring locations, and training documentation will be reviewed and updated, if necessary, annually.

#### DETERMINE THE SOURCE OF THE ILLICIT DISCHARGE

The District will develop an illicit discharge track down program to identify the source of illicit discharges and the responsible party. The program will include training on the District's illicit discharge track down procedures whenever new staff is added, procedures are updated, or every five years. The illicit discharge track-down procedures and training documentation will be reviewed and updated annually.

#### **ILLICIT DISCHARGE ELIMINATION**

The District will develop an illicit discharge elimination program consistent with the Enforcement Response Plan (ERP) found in Appendix C. The program will include: provisions for escalating enforcement, illicit discharge tracking, and confirming corrective actions have been taken. The program will include training on the District's illicit discharge elimination procedures whenever new staff is added, procedures are updated, or every five years. The illicit discharge elimination procedures and training documentation will be reviewed and updated annually.

### 3.4 MCM 4: CONSTRUCTION SITE STORMWATER RUNOFF CONTROL

The Construction Site Stormwater Runoff Control Program (CSSRCP) will be developed to prevent pollutants from construction related activities initiated by the District or occurring on district campuses, as well as promote the proper planning and installation of post-construction stormwater management practices (SMPs). SMPs are control measures, either structural or nonstructural, that are constructed as part of new development or redevelopment projects and are intended to capture, treat, reduce, and/or retain stormwater runoff.

Regulated MS4s (with land use control capabilities) address stormwater pollution from construction related activities through the adoption or amendment of local laws or other regulatory mechanisms. Since the District does not have land use control capabilities, the District has developed alternative mechanisms to control construction site stormwater such as policies, procedures, and specific contract language in lease agreements, bid specifications, contracts, and/or permits.

#### 341 PUBLIC REPORTING OF CONSTRUCTION SITE COMPLAINTS

The District has identified the Stormwater Program Coordinator as the point of contact for complaints related to District-initiated construction stormwater activities. The following information will be documented in the event of receiving a public complaint:

- 1. Date of the report;
- 2. Locations of the construction site;
- 3. Nature of complaint;
- 4. Follow up actions taken or needed; and
- 5. Inspection outcomes and any enforcement taken.

#### 3.4.2 CONSTRUCTION SITE STORMWATER RUNOFF CONTROL PROGRAM (CSSRCP)

The CSSRCP goes into effect if the District's construction activities result in a total land disturbance of greater than or equal to one acre or if the District's construction activities disturb less than one acre but is part of a larger common plan of development or sale. Furthermore, this CSSRCP is applicable only in the event that the District is not already covered under the SPDES General Permit for Stormwater Discharges from Construction Activity (No. GP-0-20-001) or an individual SPDES permit with local erosion and sediment controls. If a construction project is compliant with the terms and conditions of either of these types of permits, the project would be considered effectively controlled and this CSSRCP would not apply.

The majority of the District's construction projects will be covered under the SPDES General Permit for Stormwater Discharges from Construction Activity (No. GP-0-20-001); therefore, the requirements and management practices detailed in the following sections may not apply to all District construction projects.

#### **PRE-CONSTRUCTION MEETING:**

Prior to commencement of construction activities covered by this CSSRCP, the District will ensure a pre-construction meeting is conducted. The pre-construction meeting will be documented and will cover the following:

- If the approved project has received, or will receive, coverage under the SPDES General Permit for Stormwater Discharges from Construction Activity (No. GP-0-25-001) or an individual SPDES permit;
- 2. The individuals that have received the required stormwater trainings; and
- 3. The details of the construction oversight program and expectations for compliance with the program.

#### **CONSTRUCTION OVERSIGHT:**

As part of the CSSRCP, the District will develop a Construction Oversight Program that includes the following elements:

- 1. What types of construction activity require a SWPPP;
- 2. The procedures for submission of SWPPPs;
- 3. SWPPP review requirements;
- 4. Pre-construction oversight requirements;
- 5. Construction site inspection requirements;
- 6. Construction site close-out requirements; and
- 7. Enforcement process/expectations for compliance.

The program will also include training on the District's construction oversight procedures whenever new staff is added, procedures are updated, or every five years. Those involved in the construction activity itself (e.g., contractor, subcontractor, qualified inspector, SWPPP reviewers) will receive a four (4) hour training in proper erosion and sediment control principles from a Soil & Water Conservation District, or other NYSDEC endorsed entity.

All inspections will be documented using the Construction Site Inspection Report Form (Appendix D).

The construction oversight procedures will be reviewed and updated annually.

#### **CONSTRUCTION SITE INVENTORY & INSPECTION TRACKING:**

The District will develop and maintain an inventory of all construction sites covered under this CSSRCP. The inventory will include the following:

- 1. Location of the construction site;
- 2. Owner/operator contact information, if other than the MS4 Operator;
- 3. Receiving waterbody name and class;
- 4. Receiving waterbody WI/PWL Segment ID;
- 5. Prioritization (high or low);
- 6. SWPPP approval date;
- 7. Inspection history, including dates and ratings; and
- 8. Current status of the construction site/project;

The District will update the inventory at least annually.

#### **CONSTRUCTION SITE PRIORITIZATION:**

Within thirty (30) days of when a construction site becomes active, the District will prioritize construction sites (high or low) covered under this CSSRCP using the following method:

High priority construction sites include the following sites:

- 1. Construction sites with a direct conveyance to a surface water of the State that is:
  - a. Listed as an impaired waterbody with silt/sediment, phosphorus, or nitrogen as the Pollutant of Concern (POC);
  - b. Classified as AA-S, AA, or A waterbody utilizing the Stormwater Interactive Map on the NYSDEC website.
  - c. Classified as a trout or trout spawning designated waterbody utilizing the Stormwater Interactive Map on the NYSDEC website.
- 2. Construction sites with greater than five (5) acres of disturbed earth at any one time;
- 3. Construction sites with earth disturbance within one hundred (100) feet of any lake or pond; and/or
- 4. Construction sites within fifty (50) feet of any rivers or streams

All other construction sites are considered low priority.

The District will update the construction site prioritization at least annually.

#### **CONSTRUCTION SITE CLOSE-OUT:**

As part of the CSSRCP, the District will conduct a final construction site inspection using the Construction Site Inspection Report Form (Appendix B). A Notice of Termination will be signed by the District as required by the SPDES General Permit for Stormwater Discharges from Construction Activity. In order to file the NOT, all portions of the site not consisting of buildings or hardscapes must be stabilized with 80 percent density turf or other appropriate vegetation or landscaping. All permanent stormwater management practices and green infrastructure features must be in place and function as intended.

### 3.5 MCM 5: POST-CONSTRUCTION STORMWATER MANAGEMENT

The Post-Construction Stormwater Management Practices Program has been developed to ensure the proper operation and maintenance of post-construction SMPs and is designed to promote the long-term performance of post-construction SMPs in removing pollutants from stormwater runoff. SMPs are control measures, either structural or nonstructural, that are constructed as part of new development or redevelopment projects and are intended to capture, treat, reduce, and/or retain stormwater runoff.

The District will maintain an up-to-date inventory of post-construction SMPs, at least annually, that includes the following information at a minimum: location and type of SMP, receiving waterbody information, date of installation or discovery, and reason for installation.

The District has developed a post-construction SMP inspection and maintenance program that includes the following:

- Provisions to ensure that each post-construction SMP identified in the post-construction SMP inventory is inspected at the frequency specified in the NYSDEC Maintenance Guidance 2017 or as specified in the O&M plan contained in the approved SWPPP;
- Documentation of post-construction SMP inspections using the Post-Construction SMP Inspection Checklist;
- Provisions to initiate follow-up actions (i.e., maintenance, repair, or higher-level inspection) within thirty (30) days of post-construction SMP inspection; and,
- Provisions to initiate enforcement within sixty (60) days of the inspection if follow-up actions are not complete.

The program will also include training on the District's post-construction SMP inspection and maintenance procedures whenever new staff is added, procedures are updated, or every five years. The post-construction SMP inspection and maintenance procedures will be reviewed and updated annually.

### 3.6 MCM 6: POLLUTION PREVENTION AND GOOD HOUSEKEEPING

Pollution Prevention and Good Housekeeping is designed to ensure that the MS4 Operator's activities do not contribute pollutants to local waterbodies.

#### 3.6.7 BEST MANAGEMENT PRACTICES (BMPS)

BMPs are a cornerstone of pollution prevention for municipal facilities. Within 3 years, BMPs will be incorporated into the Municipal Facility Program and Municipal Operations Program. At a minimum, the following BMPs will be implemented:

#### **EXPOSURE MINIMIZATION:**

- Store materials and equipment inside or under storm resistant coverings.
- Utilize grading, berming, and curbing to prevent contaminated runoff and divert run-on away from these areas.
- Promptly clean up spills and leaks using dry methods.
- Use spill/overflow protection equipment.

• Perform vehicle/equipment maintenance and cleaning indoors, under covered areas, or within bermed areas.

#### PREVENTATIVE MAINTENANCE:

- Perform routine inspections, testing, and maintenance on facility equipment and systems. This includes stormwater control devices (trench drains, swales, catch basin filters, etc.).
- Ensure spill response equipment is fully stocked and readily available.
- Provide employee training on stormwater pollution prevention.
- Consider paving, marking, and sealing surfaces in dry conditions.
- Contain vehicle washwater to prevent illicit discharge into the MS4.

#### **SPILL PREVENTION AND REPONSE:**

- Store materials in appropriate containers and label containers to ensure proper material handling and spill response.
- Provide secondary containment and spill response kits for hazardous material storage areas.
- Develop procedures for addressing, containing, and cleaning spills and other chemical releases.
- Follow notification procedures and notify appropriate personnel, emergency response agencies, and regulatory agencies in the event of a spill that triggers spill reporting requirements.

#### **EROSION AND SEDIMENT CONTROL:**

- Identify areas that have the potential for significant soil erosion due to topography, land disturbance, and other factors.
- Stabilize exposed soils and control runoff by using structural and/or non-structural controls.
- Use appropriate structural, vegetative, and stabilization BMPs to limit erosion.

#### **VEGETATED AREAS / OPEN SPACE:**

- Minimize the use of pesticides, herbicides, and fertilizers.
- Ensure pesticides, herbicides, and fertilizers are stored and used properly.
- Consider drought resistant planting and alternative landscaping materials.
- Install pet waste disposal containers and signage to encourage the proper collection and disposal of pet waste.

#### **WINTER ROAD MAINTENANCE:**

- Cover storage piles of deicing material except when actively loading and unloading.
- Routinely calibrate equipment used to control salt/sand application rates.
- Ensure containment and perform routine housekeeping to limit exposure of salt/sand.

#### WASTE, GARBAGE, AND FLOATABLE DEBRIS

- Provide a sufficient number of waste receptacles for public use and perform scheduled cleanings.
- Keep all dumpster lids closed when not in use.
- Consider tarps or covers for larger waste receptacles, such as roll offs and scrap bins.
- Clean out catch basins at appropriate intervals.

#### 362 MUNICIPAL FACILITY PROGRAM

The District has developed and implemented a Municipal Facility Program including BMPs and high or low priority municipal facility requirements. Within 2 years, the District will complete an inventory of all municipal facilities. And within 3 years, the District will identify known facilities as high or low priority municipal facilities and include specific SWPPP requirements for each facility. High priority municipal facilities are facilities storing chemicals, salt, petroleum, pesticides, fertilizers, antifreeze, lead acid batteries, tires, waste/debris, fueling stations, and/or vehicle or equipment maintained and repair. These activities must be exposed to stormwater. The District does not currently have any high priority facilities.

#### 3.6.3 MUNICIPAL OPERATIONS PROGRAM

The District has developed and implement a Municipal Operations Program including BMPs incorporated into the following operations: 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.

In addition to BMP implementation, the District will include corrective actions requirements, catch basin inspection and maintenance requirements, roads, bridges, parking lots, and right of way maintenance requirements, and all other municipal operations maintenance requirements.

# 4 RECORDKEEPING, MONITORING, AND REPORTING

MS4 Operators must comply with the recordkeeping, reporting, and monitoring requirements of the SPDES General Permit. The District will maintain records required by the SPDES General Permit for at least five (5) years after they are generated. Records will be submitted electronically to NYSDEC and also made available to the public through the District's website.

#### 4.1 ANNUAL REPORT

An Annual Report will be submitted to NYSDEC by April 1 each year for the previous year reporting period (January 3 to January 2). The report will include the compliance status of permit requirements as indicated on the NYSDEC-provided electronic submission form. Progress towards achieving each MCM will be documented. Any construction projects or changes to the stormwater drainage system planned for the next reporting period will be included in the Annual Report.

#### 4.2 INTERIM PROGRESS CERTIFICATION

Semiannual Interim Progress Certifications will be submitted to NYSDEC that verify that the activities included in the SPDES General Permit have been completed by the date specified. An Interim Progress Certification for the period of January 3 through June 30 of the same year will be submitted to by October 1 of the same year. An Interim Progress Certification for the period of July 1 through January 2 of the following year will be submitted to by April 1 of the following year along with the Annual Report.

#### 4.3 SWMP FVAIUATION

At a minimum of once every five (5) years, the District will evaluate and, if necessary, update the SWMP for compliance with the terms and conditions of the SPDES General Permit, including the effectiveness or deficiencies of components of the SWMP Plan, and the status of achieving the requirements outlined in the SPDES General Permit.

## **APPENDIX**

A ORGANIZATION CHART

# PUTNAM VALLEY CENTRAL SCHOOL DISTRICT STORMWATER MANAGEMENT PROGRAM PLAN ORGANIZATIONAL CHART

(Updated 2025)

Organizational Chart					
Name	Job Title	Roles / Responsibilities			
Jeremy Luft jluft@pvcsd.org (845) 528-8143 ext. 1367	Superintendent / Ranking Official	Responsible for funding the Stormwater Management Program and signing/certifying all notices and reports required by the SPDES General Permit.			
David Spittal dspittal@pvcsd.org (845) 528-8143 ext. 1323	Director of Facilities / Stormwater Program Coordinator	Responsible for overseeing the development, implementation, and enforcement of the Stormwater Management Program. The Director of Facilities is also the District's Stormwater Public Contact.			
WSP USA Inc. dave.morelli@wsp.com 212-760-5635	Environmental Consultant	The Environmental Consultant is responsible for assisting the District in the execution of the Stormwater Management Program.			

# B MONITORING LOCATIONS INSPECTION AND SAMPLING FIELD SHEET

#### **Monitoring Locations Inspection and Sampling Field Sheet**

#### **Section 1: Background Data**

•							
Subwatershed:				Monitoring Location	n ID:		
Today's date:		Time (Military):					
Investigators:				Form completed by	y:		
Temperature (°F):		Ra	infall (in.): Last 24 ho	urs: Last 48 hours			
Latitude:		Longitude	:	GPS Unit:		GPS LMK	#:
Camera:				Photo #s:			
Land Use in Drainage	Area (Check al	ll that apply)	:				
☐ Industrial				☐ Open Space			
☐ Ultra-Urban Resider	ntial			☐ Institutional			
☐ Suburban Residenti	al			Other:			
☐ Commercial				Known Industries:			
Notes (e.g., origin, if kn	Notes (e.g., origin, if known):						
Section 2: Monito	Section 2: Monitoring Location Description						
LOCATION	MATE		F	HAPE	DIMENSIO	NS (IN.)	SUBMERGED
	RCP	CMP	☐ Circular	Single	Diameter/Dime	nsions:	In Water:
	□ PVC	☐ HDPE	☐ Elliptical	Double			☐ No ☐ Partially ☐ Fully
☐ Closed Pipe	☐ Steel		□ Вох	Triple			With Sediment:
	Other:		Other:	Other:			☐ No ☐ Partially ☐ Fully
	☐ Concrete		Trapezoid		Depth:		
☐ Open drainage	☐ Earthen		☐ <sup>Parabolic</sup>		Top Width:	-	
Open dramage	☐ Rip-Rap		☐ Other:		Bottom Width:		
	Other:	_					

#### ☐ Trickle (If present)

☐ Yes

(applicable when collecting samples)

□No

☐ In-Stream

Flow Present?

Flow Description

Section 3: Quantitative Characterization					
		FIELD DATA FOR FLOWING MON	NITORING LOCATIONS		
P	PARAMETER	RESULT	UNIT	EQUIPMENT	
☐ Flow #1	Volume		Liter	Bottle	
☐ Flow #1	Time to fill		Sec		
	Flow depth		In	Tape measure	
☐ Flow #2	Flow width	, ", ", ", ", ", ", ", ", ", ", ", ", ",	Ft, In	Tape measure	
☐ Flow #2	Measured length	, , ,,	Ft, In	Tape measure	
	Time of travel		S	Stopwatch	
Temperature			°F	Thermometer	
рН			pH Units	Test strip/Probe	
	Ammonia		mg/L	Test strip	

If No, Skip to Section 5

☐ Substantial

#### **Monitoring Locations Inspection and Sampling Field Sheet**

#### **Section 4: Physical Indicators for Flowing Monitoring Locations Only**

Are Any Physical Indicators Present in the flow?  $\Box$  Yes  $\Box$  No (If No, Skip to Section 5)

INDICATOR	CHECK if Present		DE	ESCRIPTION				R	ELATIVE SEVERITY INDEX	X (1-3)
Odor		☐ Sewage	Rancid/	/sour ☐ Petrole	um/gas		1 - Faint		☐ 2 – Easily detected	☐ 3 – Noticeable from a distance
Color		☐ Clear ☐ Green	☐ Brown ☐ Orange	☐ Gray	☐ Yellow ☐ Other:		1 – Faint colors in sample bottle	ı	2 – Clearly visible in sample bottle	☐ 3 – Clearly visible in flow
Turbidity			5	See severity			1 – Slight cloudine	ess	2 - Cloudy	☐ 3 – Opaque
Floatables		☐ Sewage	(Toilet Paper,	etc.) 🗌 Suds			4 5 (814 )		2 - Some; indications of	3 - Some; origin clear (e.g.,
-Does Not Include Trash!!		☐ Petrole	ım (oil sheen)	☐ Other:			1 – Few/slight; orig	gin	origin (e.g., possible suds or oil sheen)	obvious oil sheen, suds, or floating sanitary materials)
-	Section 5: Physical Indicators for Both Flowing and Non-Flowing Monitoring Locations  Are physical indicators that are not related to flow present?   Yes  No (If No, Skip to Section 6)									
INDICATOR	CHECK if F	Present		ſ	DESCRIPTION	N			COMM	IENTS
Monitoring Location Damage			☐ Spalling, 0	Cracking or Chip	ping 🗌 Pe	eeling Pai	nt			
Deposits/Stains			Oily	☐ Flow Li	ne 🗌 Pa	aint	Other:			
Abnormal Vegetation			☐ Excessive	☐ Inhibite	d					
Poor pool quality			☐ Odors ☐ Suds	☐ Colors	_	oatables	☐ Oil Sheen ☐ Other:			
Pipe benthic growth			Brown	☐ Orange	☐ Gr	reen	Other:			
Section 6: Overall Monitoring Location Characterization										
☐ Unlikely ☐ Potential (presence of two or more indicators) ☐ Suspect (one or more indicators with a severity of 3) ☐ Obvious										
Section 7: Data Col	lection									
1. Sample for the lab?			☐ Yes [	☐ No						
2. If yes, collected from	1:		☐ Flow [	Pool						
3. Intermittent flow trap	set?		☐ Yes [	□ No	li	f Yes, typ	e: OBM [	☐ Caull	κ dam	

Section 8: Any Non-Illicit Discharge Concerns (e.g., trash or needed infrastructure repairs)?

# C ENFORCEMENT RESPONSE PLAN

# PUTNAM VALLEY CENTRAL SCHOOL DISTRICT STORMWATER MANAGEMENT PROGRAM PLAN ENFORCEMENT RESPONSE PLAN

(Updated 2025)

#### **Enforcement Response Plan (ERP)**

As a requirement of the SPDES General Permit, the District has developed and implemented an enforcement response plan which clearly describes the action(s) to be taken for violations that the MS4 Operator has enacted for illicit discharge, construction, and post-construction. The ERP sets forth a protocol to address repeat and continuing violations through progressively stricter responses (i.e., escalation of enforcement) as needed to achieve compliance with the terms and conditions of the SPDES General Permit.

Non-traditional MS4 Operators do not hold the legal authority to pass local laws and ordinances and have no land use control capabilities. Instead, the District has developed a set of written policies/procedures with content equivalent to model local laws to address violations of the District's stormwater management program.

The enforcement responses listed, below, are based on the type, magnitude, and duration of the violation, as well as the effect of the violation on the receiving water, compliance history of the operator, and good faith of the operator in compliance efforts. Potential threats to human health or the environment will take precedence when considering the District's level of response to violations. Violations that continue over prolonged periods of time, or recurring violations, may lead to escalated levels of response in a shorter time frame than usual.

#### **Verbal Warnings/Informal Response**

For all District facilities and district-initiated land development projects, the District will respond to nonconformities against stormwater policies and procedures through informal methods, whenever reasonable. Informal responses can include verbal and/or email notices and on-site meetings in order to bring the responsible party back into compliance. Informal responses are appropriate for situations where education is needed, the responsible party is cooperative, violations do not pose a significant impact to human health or the environment, and the District believes that compliance can be achieved without the use of formal measures. The SPDES General Permit dictates that efforts to obtain voluntary correction of the nonconformities through informal enforcement must not exceed sixty (60) days in duration.

Should the violation not be corrected after informal enforcement, the violation is deemed a potential hazard to human health or the environment, the violation continues past the sixty (60)

day permit time allotment, or the violation is repeated, escalation to a formal enforcement option is necessary.

The District will document all informal enforcement responses and interactions with responsible parties. Documentation can often help establish a means for more formal enforcement actions when informal actions do not result in compliance.

#### **Notice of Violation**

When the District identifies nonconformities against written stormwater policies associated with district facilities, lease agreements, bid specifications, or permits, the District may issue a written notice of violation to the responsible party. The notice of violation shall contain:

- Name and address of the responsible party;
- The address, when available, or a description of the building, structure, or land upon which the violation is occurring or has occurred;
- A statement specifying the nature of the violation;
- A description of the remedial measures necessary to restore compliance with the applicable stormwater policy and a time schedule for the completion of such remedial action;
- A statement of the penalty or penalties that shall or may be assessed against the party to whom the notice of violation is directed;

Any party receiving a notice of violation may appeal the determination to the District's Stormwater Program Coordinator or their designee. The notice of appeal must be received within 10 days from the date of the notice of violation.

If the violation has not been corrected pursuant to the requirements set forth in the notice of violation, representatives of the District may enter upon the subject property and are authorized to take any and all measures necessary to abate the violation and/or restore the property.

Stop Work Orders for Construction Activities

The District may issue a stop-work order on district-initiated projects for violations not resolved by a notice of violation or for violations deemed potential threats to human health, or for repeated violations. Persons receiving a stop-work order shall be required to halt all land development activities, except those activities that address the violations leading to the stop-work order. The stop-work order shall be in effect until the District confirms that the land development activity is in compliance and the violation has been satisfactorily addressed.

#### **Legal Authority**

As the District is a non-traditional MS4 Operator, the District does not possess the legal authority to enact legal ordinances which include monetary penalties for specific violations. For all district-initiated land development projects, lease agreements, bid specifications, or permits, specific language will be incorporated into contract documents outlining any potential monetary damages that may be associated with violation of District stormwater policies.

#### **Documentation and Tracking Procedures**

The ERP will clearly outline the actions to be taken in response to violations related to illicit discharges, construction activities, and post-construction stormwater management, as specified in Parts VI.C–E or VII.C–E of the permit depending on the MS4 Operator type. Enforcement responses will be selected based on the type, magnitude, and duration of the violation, its impact on receiving waters, and the compliance history and good faith efforts of the party responsible. Responses may include verbal warnings, written notices, citations with fines, stop work orders, withholding of approvals, and other legally supported measures such as bond collection or direct billing for corrective actions. All enforcement actions will be tracked in the SWMP Plan. Each enforcement case will be documented with the following tables which contains the minimum information: name of the owner/operator (redacted in public versions), location of the stormwater source, description of the violation, schedule for returning to compliance, enforcement response used (including escalation if applicable), supporting documentation (e.g., notices of violation), any referrals to other departments or agencies, and the date the violation was resolved. This tracking ensures transparency, accountability, and continuous improvement in stormwater compliance efforts.

#### Conclusion

The District's Enforcement Response Plan (ERP) serves as a foundational framework to ensure compliance with the SPDES General Permit and uphold the integrity of its stormwater management program. By establishing clear enforcement protocols and tracking procedures, the District demonstrates its commitment to protecting water quality, public health, and the environment. Although operating as a non-traditional MS4 without legislative authority, the District has implemented robust policies and contractual mechanisms that mirror the intent and effectiveness of local ordinances. Through a combination of informal and formal enforcement actions, timely documentation, and escalation protocols, the District is equipped to respond to violations with consistency, transparency, and accountability. This plan not only fulfills regulatory requirements but also reinforces the District's proactive approach to environmental stewardship and continuous improvement.

#### **Enfoncement Response Plan | Appendix C**

**ENFORCMENT REPSONSE TRACKING** 

Violation ID Number	Violation Date	Location	Violation Type	Violation Description
1				
2				
3				
4				
5				
6				
7				
8				

#### **Enfoncement Response Plan | Appendix C**

**ENFORCMENT COMPLIANCE ACTION** 

Compliance ID Number	Duration to Compliance	Enforcement Response Used	Documentation and Referrals	Resolution Date
1				
2				
3				
4				
5				
6				
7				
8				

# CONSTRUCTION SITE INSPECTION REPORT FORM



### NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION DIVISION OF WATER



Ź		rk State Department of Environmer			24-001	
F	Project Name:		Date:			
_	Project Location:		Weather:			
	Permit # (if any): NYR	Contacted: □Yes □No	Entry Time:		Exit Time:	
	Name of SPDES Permittee:		Inspection Type:	□NOT	☐ Complaint	
	Phone Number(s):		,	□ Com	ppliance □ Referral	
=	On-site Representative(s) and Company(s):		MS4 Operator Nar		· .	
			MS4 Permit ID: NY	′R20A		
SPE	DES Authority					
	Yes No N/A				Citation	
1.	□ □ Does the project have permit cover				GP-0-20-001: I.A & II. B	
2. $\square$ $\square$ Is a copy of the NOI and Acknowledgment Letter available on site and accessible for viewing? GP-0-20-001: II.D.2						
3.	• •	ceptance Form available on site and accessible	e for viewing?		GP-0-20-001: II.D.2	
4.		d SWPPP retained at the construction site?			GP-0-20-001: II.D.2. & III.A.4	
$_{5.}$ $\square$ $\square$ Is a copy of the SPDES General Permit retained at the construction site?					GP-0-20-001: II.D.2	
6. $\square$ Does the NOI accurately report the number of acres to be disturbed? GP-0-20-001:				GP-0-20-001: II.B.4		
SW	PPP Content					
	Yes No N/A				Citation	
7. $\square$ $\square$ Does the SWPPP describe and identify the erosion and sediment control measures to be employed?				?	GP-0-20-001: III.B.1.e	
8.	□ □ Does the SWPPP provide an insp	pection schedule and maintenance requiremen	ts for the E&SC mea	asures?	GP-0-20-001: III.B.1.i	
9.	□ □ □ Does the SWPPP describe and ic	lentify the stormwater management practices t	o be employed?		GP-0-20-001: III.B.2	
10. $\square$ Does the SWPPP identify the contractor(s) and subcontractor(s) responsible for each measure? GP-0-20-001: III.A.6						
11.	□ □ □ Does the SWPPP identify at least of	one trained individual from each contractor(s) a	and subcontractor(s)	compan	ies? GP-0-20-001: III.A.6	
12.	2. $\square$ Does the SWPPP include all the necessary Contractor Certification Statements and signatures? GP-0-20-001: III.A.6					
13.	3. $\square$ $\square$ Is the SWPPP signed by the permittee? GP-0-20-001: VII.H.2					
14.	4. $\square$ $\square$ Is the SWPPP prepared by a qualified professional (if post-construction stormwater management required)? GP-0-20-001: III.A.3					
15.		anced Phosphorus Removal Standards (projec	cts in TMDL watersh	eds)?	GP-0-20-001: III.B.3	
Rec	ordkeeping					
	Yes No N/A				Citation	
16.	·	required by the permit (weekly, or twice week	•	•	GP-0-20-001:IV.C.2.a. & b	
17.	□ □ Are the self-inspections performe	d and signed by a qualified inspector and retain	ned on site?		GP-0-20-001:II.C.2.,IV.C.6 & VII.H	
18.	□ □ □ Do the qualified inspector's report	s include the minimum reporting requirements	?		GP-0-20-001: IV.C.4	
10	Q					



### NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION DIVISION OF WATER



#### **Visual Observations**

20. $\square$ $\square$ Are all erosion and sediment control measures installed properly? GP-0-20-001: VI	I.L
21. $\square$ $\square$ Are all erosion and sediment control measures being maintained properly? GP-0-20-001: IV	.A.1
22. $\square$ $\square$ Was written authorization issued for any disturbance greater than 5 acres? GP-0-20-001: II.	D.3
23. $\square$ Have stabilization measures been implemented in inactive areas per Permit (>5acres) or ESC Standard? GP-0-20-001: II	D.3.b & III.B.1.f
24. $\square$ $\square$ Are post-construction stormwater management practices constructed/installed correctly? GP-0-20-001: III	.B.2
25. $\square$ Has final site stabilization been achieved and temporary E&SC measures removed prior to NOT submittal? GP-0-20-001: V	.A.2
26. $\square$ $\square$ Was there a discharge from the site on the day of inspection?	
27. $\square$ $\square$ Is there evidence that a discharge caused or contributed to a violation of water quality standards? ECL 17-0501, 6	NYCRR 703.2 &
GP-0-20-001: I.	D

#### Water Quality Observations

Describe the discharge(s): location, source(s), impact on receiving water(s), etc.

Describe the quality of the receiving water(s) both upstream and downstream of the discharge:

Describe any other water quality standards or permit violations:



## NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION DIVISION OF WATER



Additional Comments:	
□ Photographs attached	
Overall Inspection Patings	1. Unactiofactory
Overall Inspection Rating:   Satisfactory   Marginal   Name/Agency of Lead Inspector:	Unsatisfactory  Signature of Lead Inspector:
Names/Agencies of Other Inspectors:	

# COMPREHENSIVE SYSTEM MAPPING







