

**REPORTING YEAR FOUR
YEAR ENDING MARCH 9, 2007**

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

Submitted To:

New York State Department of Environmental Conservation

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

Submitted By:



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

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

May 25, 2007



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

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

See information packet for information to help complete this form.

MCC Form for year ending: March 9, ___2006 (Year 3) <input checked="" type="checkbox"/> 2007 (Year 4) ___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? ___Yes <input checked="" type="checkbox"/> No			
Name: Anthony Braunscheidel		Title: Facilities Manager	Department:
Mailing Address:	Street or P.O. Box: One Peace Bridge Plaza	City: Buffalo	
	County: Erie	State: NY	Zip Code: 14213-2494
Phone: (716) 884-6744 ext. 242		E-mail Address: adb@peacebridge.com	
Local Stormwater Public Contact (Required by Minimum Measure 2)			
Is information below: 1) new or changed? ___ Yes <input checked="" type="checkbox"/> No 2) same as: <input checked="" type="checkbox"/> Owner/Operator			
Name:		Title:	Department:
Mailing Address:	Street or P.O. Box:	City:	
	County:	State:	Zip Code:
Phone: ()		E-mail Address:	
Stormwater Management Program (SWMP) Coordinator (Responsible for implementation/coordination of SWMP)			
Is information below: 1) new or changed? ___ Yes <input checked="" type="checkbox"/> No 2) same as: <input checked="" type="checkbox"/> Owner/Operator ___ Local Stormwater Public Contact			
Name:		Title:	Department:
Mailing Address:	Street or P.O. Box:	City:	
	County:	State:	Zip Code:
Phone: ()		E-mail Address:	
Annual Report Preparer			
Is information below: 1) new or changed? <input checked="" type="checkbox"/> Yes ___ No 2) same as: ___ Owner/Operator ___ Local Stormwater Public Contact ___ SWMP Coordinator			
Name: Jaime Davidson		Title: Senior Engineer	Department:
Mailing Address:	Street or P.O. Box: Parsons 40 La Riviere Drive, Suite 350	City: Buffalo	
	County: Erie	State: NY	Zip Code: 14202
Phone: (716) 541-0745		E-mail Address: Jaime.Davidson@parsons.com	

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

Section B. Local Water Quality Information

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

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

Yes (complete the table below) No Not Yet Determined

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

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

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

Yes
 No

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

Yes
 No (explain below)

Explanation:

Section C. Partnership Information

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

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

List MS4 Partners with Legally Binding Agreements or Contracts in Place

Western New York Stormwater Coalition (Members listed below)

Erie County

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

Niagara County

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

Other MS4s

- Peace Bridge Authority
- State University of New York at Buffalo

List MS4 Partners with Planned Legally Binding Agreements or Contracts

List MS4 Partners with Other Agreements in Place

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

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

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

Explain:

Section E. Funding and Resource Allocation

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

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

Explain:

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

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

Explain:

Authority Budget

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

Western New York Stormwater Coalition:

Round 6 WQIP Project - \$500,000
Round 7 WQIP Project - \$328,000
Round 8 WQIP Project - \$270,000 (awaiting contract)
Round 9 WQIP Project - \$209,200 (awaiting contract)
U.S. EPA Region 2 - \$150,000 (Lead applicant - Buffalo State College)

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

Explain:

Section F. Compliance Certification

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

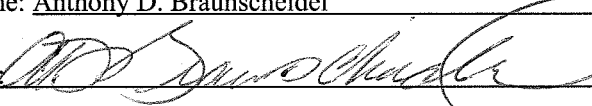
Permit Part	Minimum Control Measure	ANSWER BOTH COLUMNS FOR THIS REPORT YEAR ONLY	
		Steady Progress	Goals Achieved
IV.C.1.	Public Education and Outreach on Stormwater Impacts	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	Explain 'no' / 'N/A' answer:		
IV.C.2.	Public Involvement / Participation	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	Explain 'no' / 'N/A' answer:		
IV.C.3.	Illicit Discharge Detection and Elimination	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A
	<p>Explain 'no' / 'N/A' answer:</p> <p><i>The goal of erecting signage on Authority property prohibiting illicit discharges has been removed as a Measurable Goal. The Authority reviewed potential illicit discharge control mechanisms and decided to utilize other alternatives (refer to page 10). It is anticipated that the alternative mechanisms will be more effective than signage in prohibiting and preventing illicit discharges. Use of the selected alternative mechanisms will ensure all involved parties are properly notified that illicit discharges are prohibited, where signage may not be as reliable.</i></p> <p>Providing employee stormwater training was not fully accomplished in Year 4. The Authority's consultant developed training materials (PowerPoint presentation, handouts) in Year 4, but training was not conducted with Authority employees and is moved to a goal for Year 5.</p>		
IV.C.4.	Construction Site Stormwater Runoff Control	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	<p>Explain 'no' / 'N/A' answer:</p> <p>There were no construction projects greater than or equal to one acre in scope in Year 4</p>		
IV.C.5.	Post-Construction Stormwater Management	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	Explain 'no' / 'N/A' answer:		
IV.C.6.	Pollution Prevention / Good Housekeeping for Municipal Operations	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A
	<p>Explain 'no' / 'N/A' answer:</p> <p>Providing employee stormwater training was not fully accomplished in Year 4. The Authority's consultant developed training materials (PowerPoint presentation, handouts) in Year 4, but training on the program was not conducted with Authority employees and is moved to a goal for Year 5. The Authority did conduct Spill Awareness Training in Year 4.</p>		

Certification Statement

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

Print Name: Anthony D. Braunscheidel

Title: Facilities Manager

Signature: 

Date: May 25, 2007

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

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



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

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

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

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

Minimum Control Measure 1. Public Education and Outreach

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

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

Minimum Control Measure 1. Public Education and Outreach

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

<p>CONTINUED WNYSC PARTICIPATION – As a cooperating MS4, the WNYSC will assist the Authority with their Public Education and Outreach program. The Authority’s consultant will continue to attend WNYSC meetings and participate in other WNYSC organized events in Year 5.</p>	<p>MEASURABLE GOAL – Participate in WNYSC (minimum two meetings/year)</p> <p>YEAR 4 RESULTS – This goal was accomplished in Year 4. The Coalition held ten meetings during Year 4, with the exception of July and December. The Authority’s consultant attended the following meetings: 2006: April 12, May 10, June 14, September 13, October 11, November 8 2007: January 10, February 14.</p> <p>Attendance records are available upon request from Erie County DEP 858-7583 – Mary Rossi.</p> <p>SCHEDULE – On-going</p>
<p>WEBPAGE - An informational web page was created on the Authority website devoted to stormwater issues relevant to the community. This web page includes a general description of the stormwater Phase II regulations; pollutants of concern and their sources; the purpose of stormwater management and how the public can become involved; scheduled community events; links to the Coalition internet site and brochures; Authority stormwater contact information; and the electronic versions of the Authority’s draft and final SWMPARs. The web page is intended to augment other media for disseminating stormwater-related information and materials to the public. The website was jointly developed in Year 4 by the Authority’s consultant and IT personnel and both will work together to review and update the website content on a monthly basis in Year 5.</p>	<p>MEASURABLE GOAL – Create a stormwater information page on the Peace Bridge website</p> <p>YEAR 4 RESULTS – This goal was accomplished in Year 4. The website was posted in April 2006 under the “Community” menu on www.peacebridge.com. A copy of the Authority’s stormwater website content is attached.</p> <p>SCHEDULE – COMPLETE</p> <p>NEW MEASURABLE GOAL – Maintain/update stormwater website on a monthly basis</p> <p>YEAR 4 RESULTS – This goal was not fully accomplished in Year 4. The website was updated in May and July 2006.</p> <p>SCHEDULE – On-going</p>
<p>PRINTED MATERIAL - The Coalition has developed stormwater informational brochures and posters for stakeholders throughout Western New York. The Authority will make the brochures developed by the Coalition available at the Administration Building, as well as on the website. The Authority Facilities Manager and Administrative personnel are responsible for maintaining the brochures.</p>	<p>MEASURABLE GOAL – Make Erie County brochures available at the Administration Building</p> <p>YEAR 4 RESULTS – This goal was accomplished in Year 4.</p> <p>SCHEDULE – On-going</p>

Minimum Control Measure 1. Public Education and Outreach

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

<p>EVENTS AND PROGRAMS – The Authority’s consultant will assist in the public presentations organized by the Coalition as necessary in Year 5. The Authority will include notice of informational stormwater presentations by the Coalition on the stormwater website and encourage attendance at the bi-annual public meetings of the Coalition. In addition, Authority personnel will attend and participate in Construction Site Stormwater Runoff Control and Pollution Prevention/Good Housekeeping training activities sponsored by the Coalition when offered.</p>	<p>MEASURABLE GOAL – Participate in presentations to community groups (i.e. Presentations organized by WNYSC) YEAR 4 RESULTS – This goal was accomplished in Year 4. The Authority’s consultant attended P2/Good Housekeeping training offered by WNYSC on April 13, 2006 at ECC North Campus, and Model Ordinance Adoption Discussion offered by WNYSC on May 10, 2006 at the Erie County Fire Training Facility. In addition, information on WNYSC meetings, spring shoreline sweep, Erie County household hazardous collections, and annual report review meetings was posted on the Authority’s stormwater website (refer to attached website content). SCHEDULE – On-going</p>
<p>DISPLAYS - The Coalition has developed stormwater informational posters and displays. The Authority will display the posters developed by the Coalition in the Administration Building.</p>	<p>MEASURABLE GOAL – Display WNYSC stormwater poster in Administration Building YEAR 4 RESULTS – This goal was accomplished in Year 4. SCHEDULE – On-going</p>
<p>Additional Techniques (Completed in conjunction with the WNYSC)</p>	<p>Describe Measurable Goals and Results (when applicable) Indicate: Date Completed, Ongoing Task, or Scheduled Date (for next years activities)</p>
<p>CLASSROOM EDUCATION/SCHOOL PROGRAM - The WNYSC’s Public Education and Outreach workgroup distributed the K-12 education packages to all public and parochial schools in the Urbanized Areas of Erie & Niagara County. Content included six Project WET activities, the WNYSC’s Household Guide to Preventing Stormwater Pollution, Stormwater quiz cards and a flyer promoting stormwater P2 demonstrations using the Enviroscope watershed model.</p>	<p>YEAR 4 DATE COMPLETED – April 2006</p>

Minimum Control Measure 1. Public Education and Outreach

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

<p>MEDIA CAMPAIGN - The WNYSC has received a grant from NYSDEC for a public education campaign. As a result, the scheduled date for completing the press package was extended to Year 5 to utilize the funds available through that grant. The WNYSC's Public Education and Outreach workgroup have researched video, audio, and printed public service announcement options for the press package contents. The press package will include the following:</p> <ul style="list-style-type: none"> • Information targeting stormwater pollution prevention for households. • Opportunities for public participation at WNYSC meetings. • Invitation for public review of Annual Report. • Invitation for Community Cleanup Events. <p>Information in the press package will be generic relative to dates and times. Specific dates and times will be developed by each municipality and advertised accordingly.</p>	
<p>PUBLIC EDUCATION DISPLAY – The WNYSC developed a public education display for community outreach and education in Year 3. In Year 4, five additional public education displays were created for use by WNYSC members so that one is always available for use by the MS4s. The public education display includes:</p> <ul style="list-style-type: none"> • Stormwater pollution quiz/game • Prize wheel • Enviroscope where possible • Poster display • Brochures/public education materials 	<p>YEAR 4 DATES COMPLETED – The following outreach was conducted on behalf of the WNYSC members in Year 4:</p> <ul style="list-style-type: none"> • Earth Day Celebrations: display at Erie County Hall (April 18-24, 2006); Buffalo Zoo Earth Day Expo (June 25, 2006) • Great Lakes Student Summit (May 18-19, 2006) • Erie County Fair (August 9-20, 2006) • Elmwood Festival (August 26-27, 2006) • Daemen College Environmental Summit (September 30, 2006)
<p>OUTREACH TO COMMERCIAL ENTITIES – The WNYSC distributed the following brochures: pools, fountains, spas; concrete operations; roadways & paving. Mailing lists are available upon request.</p>	<p>YEAR 4 DATE COMPLETED – October 2006</p>
<p>2007 STORMWATER CONFERENCE & TRADESHOW - The WNYSC hosted the conference in Buffalo. Conference preparation was undertaken in Year 4 and the conference was held on March 27, 2007 (Year 5). Four tracks of interest were developed: MS4, Construction, Municipal Oversight and Municipal Officials. Topics presented addressed compliance issues, updates to requirements and guidance documents and implementation of BMPs. Over 400 attended the one-day conference; approximately half of the attendees were from MS4s throughout NYS.</p>	

Minimum Control Measure 1. Public Education and Outreach

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

<p>RAIN GARDEN DEMONSTRATION PROJECT - A Rain Garden Demonstration Project was funded by NYS Soil & Water Conservation Committee (through ECDEP participation in the Erie County Water Quality Committee). Two demonstration rain gardens were installed in Year 4 in the Village of Hamburg and the Town of West Seneca. A third will be installed in Year 5 in the Town of Tonawanda. Signage and public education materials will be available at these MS4 locations.</p>	
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<p>Explain any changes or additions to the Permit Referenced Activities / Techniques, Measurable Goals and / or Scheduled Dates above and provide a reason(s) for the change:</p> <p>The Authority has added a <u>new</u> measurable goal for Year 5: Maintain/update the Authority’s stormwater website on a monthly basis. The stormwater website is an excellent means of disseminating public education information and public /involvement and participation opportunities. To ensure its effectiveness, the website content must be kept current.</p>
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Minimum Control Measure 2. Public Involvement/Participation

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

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

Minimum Control Measure 2. Public Involvement/Participation

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

<p>WNYSC MEETINGS - The WNYSC opens its meetings to the public two times per year, in October and April, to enhance public access to information and encourage involvement. The meeting consists of a brief overview of the stormwater regulations and how the public can be involved. The public in attendance are invited to participate in any of the Coalition’s workgroups. The draft Annual report, public education materials and other information are provided.</p>	<p>MEASURABLE GOAL – Open WNYSC meetings to the public (2 meetings/year)</p> <p>YEAR 4 DATES COMPLETED – April 12, 2006 and October 11, 2006</p> <p>YEAR 5 SCHEDULE – April 18, 2007 and October 10, 2007</p>
<p>PUBLIC INVOLVEMENT/PARTICIPATION OPPORTUNITIES – The Authority will promote, via the public notice venues, Coalition-sponsored public involvement opportunities. These may include WNYSC meetings and regional environmental events such as County-sponsored Household Hazardous Waste Drop Off Days, County-sponsored Electronics Recycling Days, Earth Day events and beach cleanups.</p>	<p>Refer to “Additional Techniques” for Year 4 WNYSC-sponsored public involvement opportunities.</p> <p>MEASURABLE GOAL – Post WNYSC-sponsored public involvement opportunities on the Authority’s stormwater website.</p> <p>YEAR 4 RESULTS – Information on WNYSC meetings, spring shoreline sweep, Erie County household hazardous collections, and annual report review and review meetings was posted under “Upcoming Event and Important Dates” on the Authority’s stormwater website (refer to attached website content).</p> <p>SCHEDULE – On-going</p>
<p>PUBLIC PRESENTATION AND COMMENTS RECEIVED ON SWMP AND ANNUAL REPORT</p> <ul style="list-style-type: none"> • The draft Year 4 Annual Report was available to the public attending the open WNYSC meeting in April 18, 2007. • The draft Year 4 annual report was posted on the Authority’s website for review and comment in May 2007. • Hard copies of the draft Year 4 Annual Report were available at the Administration Building and on request from the Stormwater Contact. • Additional opportunities for public review of the Annual report were at five public libraries (four in Erie County; one in Niagara County). The library outreach is conducted by Erie County staff to receive public comment on the draft Annual Report and also use the public education display and public education materials for general outreach. • Similar activities will be conducted in Year 5. 	<p>MEASURABLE GOAL – Make SWMP Annual Report available to the public</p> <p>YEAR 4 RESULTS – This goal was accomplished in Year 4, as described in the adjacent column. See following page for additional detail.</p> <p>SCHEDULE – On-going (see following page for anticipated dates)</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.a, f: Develop procedures to provide public notice about and access to documents and information in a manner that complies with state and local public notice requirements. <i>Describe procedures below and state the methods used to publicize the AR public presentation.</i></p>		
<p>Open WNYSC meetings and opportunities for annual report review at library events are publicized via press release to the Buffalo News, Niagara Gazette and all weekly community newspapers serving the regulated municipalities by the WNYSC, and are also listed on the Authority’s stormwater website in April and May. Availability of the draft annual report for review from the Administration Building and Stormwater contact is also promoted on the Authority’s stormwater website. In May, the Authority posts the draft annual report on their stormwater website for review and comment by the public.</p>		
<p>Permit Reference IV.C.2.e: Public presentation of; f: summary of comments received on; and g: intended response to comments on the SWMPAR.</p>		
<p>Summarize attendance at the public presentation of the Annual Report. Include number of attendees and who was represented:</p>		
<p>WNYSC meeting and library attendance information is available from Erie County DEP 858-7583 – Mary Rossi. The comments received at these meetings and intended responses are attached. The Authority’s Stormwater Contact did not receive any comments on the Draft Year 4 Annual Report.</p>		
<p>Comments on Annual Report Meeting ___ No public comments received on Annual Report. <u>X</u> Comments received. Attach summary of comments and intended responses.</p>	<p>Date of Annual Report Meeting: April 11, 2007 (1 library) April 17, 2007 (1 library) April 18, 2007 (WNYSC meeting) April 28, 2007 (1 library) May 1, 2007 (1 library) May 5, 2007 (1 library) May 2007 (website posting)</p>	<p>Approximate Date of Meeting Next Year: April/May 2008</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.

Additional Techniques (Completed in conjunction with the WNYSC)	Describe Measurable Goals and Results (when applicable) Indicate: Date Completed, Ongoing Task, or Scheduled Date (for next years activities)
<p>STREAM, BEACH, ROADWAY CLEANUPS - The WNYSC is working in cooperation with the Buffalo Niagara Riverkeepers, a local watershed organization, on spring and fall cleanup events such as the Beach Sweep U.S.A. (Fall), Great American Cleanup (March-May); Spring Shoreline Sweep (April).</p>	<p>YEAR 4 DATES COMPLETED: April 21-23, 2006 and September 15-16, 2006 YEAR 5 SCHEDULED DATES: April 20-22, 2007 and September 2007</p>
<p>HOUSEHOLD HAZARDOUS WASTE COLLECTIONS - Erie County held three household hazardous waste collections in 2006 (2,432 households participated). Niagara County participated in the Clean Sweep NY event (170 participated).</p>	<p>YEAR 4 DATES COMPLETED: Erie County - May 13, 2006; June 17, 2006; September 9, 2006 Niagara County - April 24, 2006 YEAR 5 SCHEDULED DATES: Erie County - May 12, 2007; June 16, 2007; September 8, 2007 Niagara County - Spring/Summer 2007</p>
<p>Explain any changes or additions to the Permit Referenced Activities / Techniques, Measurable Goals and / or Scheduled Dates above and provide a reason(s) for the change: N/A</p>	

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

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

<p>Permit Reference IV.C.3.a: Develop, implement and enforce a program to detect, identify and eliminate illicit discharges, including illegal dumping, into the MS4.</p> <ul style="list-style-type: none"> • <i>Explain the activities and procedures used to meet this requirement this year and planned for next year.</i> • <i>Revise as procedures are updated.</i> • <i>Identify personnel or outside organization conducting the activities</i> 	<p>Describe Measurable Goals and Results (when applicable) Indicate: Date Completed, Ongoing Task, or Scheduled Date (for next years activities)</p> <ul style="list-style-type: none"> • <i>Example measurable goals: number of illicit discharges detected; number of illicit discharges eliminated.</i>
AUTHORITY PROGRAM AND ACCOMPLISHMENTS	
<p>STORMWATER MANAGEMENT PROGRAM - In Year 2 the Authority developed a written SWMP that outlines a process for identifying existing illicit discharges and states that illicit discharges are prohibited on Authority property. A copy of the Authority’s SWMP is available upon request (Anthony Braunscheidel: 716-884-6744 ext. 242). The Authority’s written SWMP will be reviewed and updated by the Authority’s consultant on an annual basis. Information developed as part of the WNYSC SWMP will be incorporated in the Authority’s SWMP, where applicable.</p>	<p>MEASURABLE GOAL – Review and update SWMP annually. YEAR 4 RESULTS – This goal was accomplished in Year 4. The Authority’s SWMP was updated and revisions were issued in August 2006. SCHEDULE – On-going. Anticipated Year 5 revision date is June 2007.</p>
<p>The Authority will utilize the following mechanisms to prohibit and prevent illicit discharges on Authority property:</p> <ul style="list-style-type: none"> • Authority employees will be trained on illicit discharges and the procedures to be followed on Authority property. Enforcement procedures for violations of the Authority’s illicit discharge policy will be outlined during the training. • Language prohibiting illicit discharges on Authority property will be included in tenant lease agreements. This language will include penalties for violations. • NYSDOT Standard Specifications for water quality protection and temporary soil erosion and sediment control will be incorporated or referenced in all construction/bid documents as a basis for construction site stormwater runoff control (refer to Minimum Control Measure 4). <p>Erecting signage on Authority property prohibiting illicit discharges will no longer be used as a BMP and is removed as a measurable goal. It is anticipated that the above mechanisms will be more effective than signage in preventing illicit discharges. Use of the selected mechanisms will ensure all involved parties are properly notified that illicit discharges are prohibited, where signage may not be as reliable.</p>	<p>MEASURABLE GOAL – Erect signage on Authority property prohibiting illicit discharges YEAR 4 RESULTS – This goal was not fully accomplished in Year 4. The Authority reviewed potential control mechanisms and decided to utilize the mechanisms listed in the adjacent column. <i>Erecting signage is removed as a Measurable Goal.</i></p> <p>NEW MEASURABLE GOAL – Develop tenant lease agreement language prohibiting illicit discharges and incorporate in all current lease agreements. SCHEDULE – This is a Year 5 goal.</p>

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

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

<p>Permit Reference IV.C.3.b: Develop and maintain a map showing the location of all outfalls and the names and location of all waters of the US that receive discharges from outfalls. <i>Explain activities performed this year and planned for next year, including work on the following IDDE guidance prerequisites:</i></p> <ul style="list-style-type: none"> • field verification of outfall locations; • mapping all inter-municipal subsurface conveyances; • delineating storm sewershed; and • developing and retaining MS4 mapping as needed to find the source and identify illicit discharges. <i>State if maps are in GIS.</i> 	<p>Describe Measurable Goals and Results (when applicable) Indicate: Date Completed, Ongoing Task, or Scheduled Date (for next years activities)</p> <ul style="list-style-type: none"> • <i>Example measurable goals: percent of outfalls mapped</i>
<p>STORMWATER CONVEYANCE SYSTEM INSPECTION AND MAPPING UPDATES – The Authority will complete a field walk-through and visually inspect the stormwater conveyance system on an annual basis. Information gathered during the walk-through will be used to update base mapping. Inspections will be completed by a 2-3 person team comprised of Authority personnel and the Authority’s consultant.</p> <p>In Year 4, a comprehensive inspection of each conveyance system facility (i.e., outfall, catch basin) was completed to confirm system mapping and document the existing condition of each facility. As part of this inspection a formal numbering convention was developed and a unique number was assigned to each stormwater facility for future tracking purposes. Inspections were documented using the Authority’s detailed inspection form that was included in the Year 3 annual report. The data gathered will be used to prioritize cleaning and maintenance efforts.</p>	<p>MEASURABLE GOAL – Update collection system and outfalls map YEAR 4 RESULTS – This goal was accomplished in Year 4. Inspections were completed the week of April 10, 2006. Existing system map was updated in June 2006. Two additional outfalls were located during the comprehensive inspection. The Authority now has 7 outfalls, all of which are inter-municipal subsurface conveyances, and 100% of these have been mapped in Microstation. An additional storm sewershed was also observed during the inspection. The Authority now has 3 storm sewersheds which have also been delineated on the mapping. For the inspection each storm facility was assigned a unique tracking number that has been added to the storm mapping. SCHEDULE – On-going. Existing system map will be reviewed and updated in June 2007.</p>
<p>ILLICIT CONNECTION IDENTIFICATION AND DYE TESTING – In Year 4, dye testing was utilized to confirm the configuration of the Authority’s stormwater collection system and identify illicit connections on Authority property. Specifically, dye testing was used to determine the connection point of building floor drains and any suspect facilities identified during the comprehensive field walk-through. The results of this investigation are attached.</p> <p>In subsequent years, illicit connections will be identified through the annual visual inspection of facilities and dye testing will be performed on specific facilities on an “as needed” basis. Starting in Year 5 the Authority will begin working to address the recommendations identified in the Year 4 report.</p>	<p>MEASURABLE GOAL – Dye testing of storm sewer system YEAR 4 RESULTS – This goal was accomplished in Year 4. Field work was completed the week of April 10, 2006 and a summary memorandum, dated July 20, 2006, was developed. The memorandum entitled “2006 Comprehensive Facility Inspection and Dye Testing Results” is attached. SCHEDULE – COMPLETE</p> <p>MEASURABLE GOAL – Identify illicit connections YEAR 4 RESULTS – This goal was accomplished in Year 4. A comprehensive facility inspection with dye testing was completed the week of April 10, 2006, as described above. SCHEDULE – On-going. In Year 5 the Authority will begin working to address the recommendations identified in the Year 4 memorandum.</p>

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

<p>Permit Reference IV.C.3.c: Prohibit, through an ordinance, local law or other regulatory mechanism, illicit discharges into the MS4. The MS4s have until year 5 to complete the local law work. See the instructions for information about completing this section.</p>	
<p>Does the MS4 have the legal authority to enact ordinances, local laws or other regulatory mechanisms?</p>	<p><input checked="" type="checkbox"/> No (go to ADDENDUM 1) <input type="checkbox"/> Yes (complete questions below)</p>
<p>Assessment of Regulatory Mechanism (Local Code)</p>	
<p>1) When was this assessment completed or planned to be completed?</p>	<p>Date completed: _____ <input type="checkbox"/> Not yet completed (proceed to next table) Plan to complete for reporting in year: ___4; ___5.</p>
<p>2) Is there an existing ordinance, local law or other regulatory mechanism?</p>	<p><input type="checkbox"/> No (go to question 5) <input type="checkbox"/> Yes</p>
<p>3) Does the existing regulatory mechanism prohibit illicit discharges as required by the MS4 Permit?</p>	<p><input type="checkbox"/> No (amendments needed) <input type="checkbox"/> Yes</p>
<p>4) Does the existing regulatory mechanism include enforcement authorities and procedures as required by the MS4 Permit?</p>	<p><input type="checkbox"/> No (amendments needed) <input type="checkbox"/> Yes</p>
<p>Development of Regulatory Mechanism (Local Codes)</p>	
<p>5) When was this work completed or planned to be completed?</p>	<p>Date completed: _____ <input type="checkbox"/> Not yet completed (proceed to next table) Plan to complete work below for reporting in year: ___4; ___5.</p>
<p>6) If you answered 'No' to question 1, 2 or 3, what regulatory mechanism or amendments will be adopted to meet the MS4 permit requirements?</p>	<p><input type="checkbox"/> NYS IDDE Model Law in its entirety <input type="checkbox"/> Selected NYS IDDE Model Law articles adopted as amendments to existing code(s) that are equivalent to the NYS IDDE Model Law <input type="checkbox"/> MS4 will write language equivalent to NYS IDDE Model Law</p>
<p>7) If you answered 'No' to question 1, 2 or 3, has a list of needed changes to local codes been developed for adoption of the regulatory mechanism?</p>	<p><input type="checkbox"/> No <input type="checkbox"/> Yes, list the local code(s) that will be changed:</p>
<p>8) If the existing regulatory mechanism does not require amendments, what language is in the mechanism?</p>	<p><input type="checkbox"/> NYS IDDE Model Law in its entirety <input type="checkbox"/> Selected NYS IDDE Model Law articles adopted as amendments to existing code(s) that are equivalent to the NYS IDDE Model Law <input type="checkbox"/> Language equivalent to NYS IDDE Model Law</p>
<p>9) What was the date or is the planned date of local law adoption?</p>	<p>Date:</p>
<p>10) Provide a web address if adopted local law can be found on a web site.</p>	<p>Web Address:</p>

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

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

<p>Permit Reference IV.C.3.e: Inform public employees, businesses and the general public of hazards associated with illegal discharges and improper disposal of waste.</p> <ul style="list-style-type: none"> • <i>Explain activities and materials used to meet this requirement this year <u>and</u> planned for next year</i> • <i>Identify personnel or outside organization conducting activities</i> 	<p>Describe Measurable Goals and Results (when applicable) Indicate: Date Completed, Ongoing Task, or Scheduled Date (for next years activities)</p>
<p>EMPLOYEE STORMWATER TRAINING - The Authority will organize and conduct training sessions for Authority employees on stormwater management. Topics will include, at a minimum, an overview of stormwater and the SPDES permit requirements; the potential impacts of illicit connections and discharges on stormwater and how they can be detected and eliminated; best management practices for stormwater management; review of the Authority’s Stormwater Management Program and standard operating procedures.</p> <p>Training materials were finalized by the Authority’s stormwater consultant in Year 4. Training will be conducted by Authority’s health and safety coordinator every two years, starting in Year 5, and as necessary to update employees on major changes to the SWMP.</p>	<p>MEASURABLE GOAL – Conduct informational stormwater workshop with Authority employees YEAR 4 RESULTS – This goal was not fully accomplished in Year 4. The Authority’s consultant developed training materials (PowerPoint presentation, handouts) in Year 4, but training was not conducted with Authority employees. SCHEDULE – Initial training will be conducted in Year 5, and every two years thereafter.</p>
<p>Additional Techniques (Completed in conjunction with the WNYSC)</p>	<p>Describe Measurable Goals and Results (when applicable) Indicate: Date Completed, Ongoing Task, or Scheduled Date (for next years activities)</p>
<p>WNYSC GIS OUTFALL MAPPING – The initial GIS mapping of outfalls for the WNYSC members was completed in November 2006. All data will be reviewed by MS4s for QA/QC purposes and the necessary revisions, additions and deletions will be made. Approximately 30% of the MS4s have had their data revised and updated as per their review. It is anticipated that the remainder of the MS4s will have all necessary corrections to their data by July 2007.</p> <p>An initial visual inspection was conducted by the outfall mapping contractor on each of the outfalls mapped during the Year 3 and Year 4 reporting periods. The information and data detailing the inspections was made available to all of the MS4s by the contractor as part of the GIS mapping database.</p> <p>The outfall mapping data has been incorporated into a GIS database which all of the member MS4s have access to through the Erie County web site (http://gis1.erie.gov/website/ENSSO/viewer.htm). This database of information, as well as the map, is being used to supplement the Authority’s existing program. Erie County’s GIS Department maintains the outfall mapper and has established procedures for MS4s to update their records and add/remove outfalls as needed.</p>	<p>YEAR 4 RESULTS – The Authority’s outfalls were mapped in GIS in Year 4. The Authority’s consultant also reviewed the initial data and provided comments to the outfall mapping contractor in January 2007. YEAR 5 SCHEDULE - The anticipated completion date for the WNYSC project is July 2007.</p>

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

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

<p>IDDE PROGRAM PROCEDURES AND PROTOCOLS - A draft Illicit Discharge Detection & Elimination Program protocol has been developed for incorporation into the WNYSC’s Stormwater Management Plan. This protocol will be evaluated and embellished through a pilot IDDE trackdown project with Buffalo State College which will be conducted during reporting Year 5.</p> <p>The MS4s have been reviewing the inspection data for the outfalls that have been mapped and have started prioritizing their outfalls for follow up inspections and additional IDDE work. A list of criteria was developed and distributed to the MS4s to use in assessing priorities. The host municipalities and the priority outfalls have been identified for the IDDE pilot project. Draft goals will be established during this reporting period. The pilot project to formalize procedures and finalize the goals has been initiated.</p>	
<p>ILLCIT DISCHARGE PUBLIC OUTREACH - Industry specific brochures have been developed for nine targeted industry and business groups informing them of how they can prevent stormwater pollution. These brochures are available on the Peace Bridge and Erie County websites, and printed copies are available at the Administration Building. Direct mailing to the construction related businesses, registered pesticide applicators, restaurants, automotive repair facilities, mobile cleaners, pool, spa & fountain operators, concrete operations and roadway and paving operations in Erie and Niagara Counties has been completed. If necessary the WNYSC will develop additional industry specific brochure(s) should any new targeted priority business groups emerge among the MS4s.</p>	
<p>Explain any changes or additions to the Permit Referenced Activities / Techniques, Measurable Goals and / or Scheduled Dates above and provide a reason(s) for the change:</p> <p><i>The goal of erecting signage on Authority property prohibiting illicit discharges has been removed as a Measurable Goal.</i> The Authority reviewed potential illicit discharge control mechanisms and decided to utilize other alternatives (refer to page 10). It is anticipated that the alternative mechanisms will be more effective than signage in prohibiting and preventing illicit discharges. Use of the selected alternative mechanisms will ensure all involved parties are properly notified that illicit discharges are prohibited, where signage may not be as reliable.</p> <p>The Authority has added a <u>new</u> measurable goal for Year 5: Develop tenant lease agreement language prohibiting illicit discharges and incorporate in all current lease agreements.</p> <p>Providing employee stormwater training was not fully accomplished in Year 4. The Authority’s consultant developed training materials (PowerPoint presentation, handouts) in Year 4, but training was not conducted with Authority employees and is moved to a goal for Year 5.</p>	

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Minimum Control Measure 4. Construction Site Stormwater Runoff Control

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

<p>Permit Reference IV.C.4.b. v: Develop and implement procedures for site plan review by the MS4 that incorporate consideration of potential water quality impacts and review individual pre-construction site plans to ensure consistency with local sediment and erosion control requirements.</p> <ul style="list-style-type: none"> • Describe the procedures below. <u>Revise as procedures are updated.</u> 	<p>Describe Measurable Goals and Results (when applicable) Indicate: Date Completed, Ongoing Task, or Scheduled Date (for next years activities)</p> <ul style="list-style-type: none"> • Example measurable goals: number of plans received; number of plans reviewed; percent of plans received that are reviewed.
<p>AUTHORITY PROGRAM AND ACCOMPLISHMENTS</p>	
<p>In Year 2 the Authority developed a written SWMP that defines their construction site stormwater runoff control program, BMPs and maintenance practices for BMPs. The construction site stormwater runoff control program outlines erosion and sediment control requirements and procedures for construction site plan review, public comment on construction plans, construction site waste management, site inspections, enforcement, and education and training of construction site operators. A copy of the Authority’s SWMP is available upon request (Anthony Braunscheidel: 716-884-6744 ext. 242).</p> <p>The Authority’s written SWMP will be reviewed and updated on an annual basis. Information developed as part of the Coalition SWMP, including BMP maintenance standards, will be incorporated in the Authority’s SWMP where applicable.</p> <p>Components of the Authority’s program are described below. Additional activities completed in conjunction with the WNYSC in Year 4 are described in “Additional Techniques.”</p>	<p>MEASURABLE GOAL – Update BMPs and incorporate into the SWMP YEAR 4 RESULTS – This goal was accomplished in Year 4. The Authority’s SWMP was updated and revisions were issued in August 2006. SCHEDULE – On-going. Anticipated Year 5 revision date is June 2007.</p>
<p>CONSTRUCTION SITE PLAN REVIEW PROCEDURES - The Authority is a private, non-traditional MS4 operator, and, as a result, has full control over all construction projects on its property. Bid documents and design drawings for any work completed on Authority property will be developed under the Authority’s direction by consultants under contract with the Authority. As part of the design phase of each project, the Facilities Manager or Authority’s consultant will review the SWPPP and design drawings in detail and provide feedback on stormwater-related issues, such as potential water quality impacts and consistency with Authority sediment and erosion control requirements. The following three standard review checklists were incorporated into the Authority’s SWMP (Appendix G) in August 2006:</p> <ol style="list-style-type: none"> 1. Example Checklist for Preliminary Stormwater Management Plan Preparation and Review (<i>New York State Stormwater Management Design Manual</i>, October 2001) 2. Example Checklist for Final Stormwater Management Plan Preparation and Review (<i>New York State Stormwater Management Design Manual</i>, October 2001) 3. Stormwater Pollution Prevention Plan (SWPPP) Checklist (<i>New York Standards for Erosion and Sediment Control</i>, March 2003) 	<p>MEASURABLE GOAL – Develop construction site plan review checklist YEAR 4 RESULTS – This goal was accomplished in Year 4. The three standard checklists listed in the adjacent column have been incorporated into the Authority’s SWMP (Appendix G) to assist with construction site plan review. SCHEDULE – COMPLETE</p>

Minimum Control Measure 4. Construction Site Stormwater Runoff Control

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

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

Minimum Control Measure 4. Construction Site Stormwater Runoff Control

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

<p>SITE INSPECTIONS – The Authority will contract with an independent consultant to provide construction oversight and inspection on all projects greater than one acre. The consultant will be responsible for ensuring all erosion and sediment controls are installed as designed or approved by the project engineer. Authority maintenance personnel will also periodically conduct site a walk-through to verify stormwater controls are in place and operating as designed. A standard inspection checklist, entitled “Stormwater-Related Maintenance Tracking Form – Construction Site Inspection,” was developed and incorporated into the Authority’s SWMP (Appendix G) in August 2006. A copy of this form is attached.</p>	<p>MEASURABLE GOAL – Develop site inspection checklist YEAR 4 RESULTS – This goal was accomplished in Year 4. A standard inspection checklist, entitled “Stormwater-Related Maintenance Tracking Form – Construction Site Inspection,” was developed and incorporated into the Authority’s SWMP (Appendix G) to assist with construction site inspection. SCHEDULE – COMPLETE</p> <p>MEASURABLE GOAL – Inspect sites for compliance with regulatory mechanism and BMPs. YEAR 4 RESULTS – There were no construction projects greater than or equal to one acre in scope in Year 4. SCHEDULE – On-going.</p>
<p>ENFORCEMENT – Enforcement requirements will be determined on a project-by-project basis, and penalties for non-compliance with the Authority’s stormwater construction site stormwater runoff control program will be documented in the project specifications. The NYSDOT Standard Specification for prosecution and progress will be incorporated or referenced in all construction/bid documents as a basis for construction site stormwater runoff control enforcement.</p>	<p>MEASURABLE GOAL – Issue stormwater requirements to construction site operators during bidding process YEAR 4 RESULTS – There were no construction projects greater than or equal to one acre in scope in Year 4. The Authority decided that they will continue to incorporate or reference NYSDOT Standard Specifications in all construction/bid documents as a basis for construction site stormwater runoff control, and these can be modified, as necessary, on a project-by-project basis. SCHEDULE – On-going.</p>
<p>Permit Reference IV.C.4.b. viii: Educate and train construction site operators about requirements to develop and implement a SWPPP and any other requirements they must meet within the MS4s jurisdiction.</p> <ul style="list-style-type: none"> • <i>Explain the activities and materials used to meet this requirement.</i> • <i>Identify the personnel or outside organization conducting this activity.</i> • <i>Indicate activities planned for next year.</i> 	<p>Describe Measurable Goals and Results (when applicable) Indicate: Date Completed, Ongoing Task, or Scheduled Date (for next years activities)</p>
<p>DISTRIBUTE EDUCATIONAL MATERIALS TO CONSTRUCTION SITE OPERATORS - The public education materials developed for contractors will be distributed by the WNYSC via direct mail.</p>	<p>SCHEDULE – The WNYSC will distribute education materials to construction site operators during Year 5.</p>

Minimum Control Measure 4. Construction Site Stormwater Runoff Control

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

<p>WNYSC CONSTRUCTION SITE INSPECTION TRAINING PROGRAM - To provide MS4s with “hands on” field assessments, training sessions for Code Enforcer / Highway Department / Town Engineer / Building Department staff was developed. The training consists of a morning classroom session followed by a field assessment at a local construction site in the afternoon. The agenda includes: Introduction to Phase II Stormwater Regulations; NYSDEC Phase II Construction Regulations; Inspection Protocol (classroom); Review of site plan for the field assessment; Inspection Protocol (field); Construction site observations; NOI & SWPP inspection; Weekly inspection reports review; and, Inspection of the site. Nine trainings were completed during Year 4 for 27 MS4s. WNYSC coordinates this training.</p>	<p>YEAR 4 RESULTS – There were no available openings for Authority personnel to attend the training conducted by WNYSC in Year 4. SCHEDULE – Authority personnel will attend this training if there is availability during Year 5.</p>
<p>Additional Techniques (Completed in conjunction with the WNYSC)</p>	<p>Describe Measurable Goals and Results (when applicable) Indicate: Date Completed, Ongoing Task, or Scheduled Date (for next years activities)</p>
<p>MS4 ELECTED OFFICIALS PRESENTATION - The WNYSC developed a 15-minute presentation to educate elected officials on the Phase II Stormwater Regulations, which is available for use by WNYSC members.</p>	
<p>TRAINING FOR CONTRACTORS AND DESIGN PROFESSIONALS - The WNYSC has scheduled a training session for contractors and design professionals on April 24, 2007. Training is being coordinated with Buffalo Niagara Builders Association, South Towns Builders Association and Niagara County Builders Association.</p>	
<p>Explain any changes or additions to the Permit Referenced Activities / Techniques, Measurable Goals and / or Scheduled Dates above and provide a reason(s) for the change: N/A</p>	

Minimum Control Measure 5. Post-Construction Stormwater Management

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

Permit Reference IV.C.5.a, c. Develop and implement a post-construction stormwater management program that addresses stormwater runoff from new development and redevelopment and will reduce the discharge of pollutants to the MEP. Program requirements should include:	Describe Measurable Goals and Results (when applicable) Indicate: Date Completed, Ongoing Task, or Scheduled Date (for next years activities)
<ul style="list-style-type: none"> • A combination of structural and/or non-structural management practices. • <i>Identify and describe below procedures to ensure installation of post-construction management practices. <u>Revise as procedures are updated.</u></i> 	DO NOT ENTER INFORMATION IN THIS CELL
AUTHORITY PROGRAM AND ACCOMPLISHMENTS	
<p>STRUCTURAL MANAGEMENT PRACTICES - The Authority has proactively implemented structural post-construction BMPs, including oil/water separators and an in-line spill containment system, and will continue to utilize these structural post-construction BMPs to address stormwater runoff from new development and redevelopment projects that disturb greater than or equal to one acre.</p> <p>The existing structural BMPs will be evaluated on an annual basis to ensure their appropriateness and effectiveness in reducing stormwater runoff impacts to the maximum extent practicable. Structural BMPs will be updated as necessary during the annual SWMP review to reflect changing conditions on Authority property.</p>	<p>MEASURABLE GOAL – Update BMPs and incorporate into the SWMP</p> <p>YEAR 4 RESULTS – This goal was accomplished in Year 4. The Authority’s SWMP was updated and revisions were issued in August 2006.</p> <p>SCHEDULE – On-going. Anticipated Year 5 revision date is June 2007.</p>
<p>NON-STRUCTURAL MANAGEMENT PRACTICES – Refer to Minimum Control Measure 6 for information on the non-structural post-construction BMPs implemented by the Authority.</p>	
<ul style="list-style-type: none"> • Procedures for site plan and SWPPP review to ensure SWMPs meet state standards. • <i>Describe procedures below. <u>Revise as procedures are updated.</u></i> 	<ul style="list-style-type: none"> • <i>Example measurable goals include: number of plans received; number of plans reviewed; percent of plans received that are reviewed.</i>
Refer to “Construction Site Plan Review Procedures” described in Minimum Control Measure 4 for information on the site plan and SWPPP review process.	

Minimum Control Measure 5. Post-Construction Stormwater Management

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

Permit Reference IV.C.5.a, c. (continued): Develop and implement a post-construction stormwater management program that addresses stormwater runoff from new development and redevelopment and will reduce the discharge of pollutants to the MEP. Program requirements should include:	Describe Measurable Goals and Results (when applicable) Indicate: Date Completed, Ongoing Task, or Scheduled Date (for next years activities)
<ul style="list-style-type: none"> • Procedures for inspection and maintenance of post-construction management practices. • <i>Explain procedures below. <u>Revise as procedures are updated.</u></i> 	<ul style="list-style-type: none"> • <i>Example measurable goals are number of: inspections maintenance activities performed.</i>
<p>STORMWATER CONVEYANCE SYSTEM INSPECTION AND MAINTENANCE - The Authority’s storm sewers, catch basins, and post-construction BMPs (i.e., oil/water separators) are inspected on an annual basis by the Authority Maintenance Staff to identify maintenance needs. This inspection is typically conducted in spring (March or April) following the final snowmelt of the season and documented on the Authority’s detailed inspection form.</p> <p>Stormwater conveyance facilities are cleaned on an “as-needed” basis in conjunction with the annual inspection, and as required following a spill incident. Typical maintenance procedures include removal of large debris and silt from stormwater facilities. When sewer maintenance needs exceed the capabilities of the Authority Maintenance Staff, the Authority will contract an outside firm, who is a certified waste hauler, to complete the required work.</p>	<p>MEASURABLE GOAL – Continue to develop inspection and maintenance program</p> <p>YEAR 4 RESULTS – This goal was accomplished in Year 4. A comprehensive system inspection was completed the week of April 10, 2006. Recommendations from this inspection were documented in a memorandum (refer to attached). This work was used to further refine the inspection and maintenance program, which is now set and fully operational.</p> <p>SCHEDULE – COMPLETE</p> <p>MEASURABLE GOAL – Implement inspection and maintenance program</p> <p>YEAR 4 RESULTS – This goal was accomplished in Year 4. A comprehensive system inspection was completed the week of April 10, 2006. Recommendations from this inspection were documented in a memorandum (refer to attached). In addition to the comprehensive inspection, Authority personnel inspected catch basins in March 2006 and November 2006, catch basins were cleaned in May 2006, and oil/water separators were inspected and cleaned in June 2006.</p> <p>SCHEDULE – On-going. In Year 5 the Authority will begin working to address the recommendations identified in the Year 4 memorandum. In addition, anticipated Year 5 inspection will be in May 2007 and cleaning will be in June 2007.</p>
<ul style="list-style-type: none"> • Procedures for enforcement and penalization of violators. • <i>Explain procedures below. <u>Revise as procedures are updated.</u></i> 	<ul style="list-style-type: none"> • <i>Example measurable goals: number enforcement activities performed.</i>
<p>As a private, non-traditional MS4 operator, the Authority is fully responsible for implementing post-construction management practices, as well as properly operating and maintaining them. Therefore, a regulatory mechanism for program enforcement is not required.</p>	

Minimum Control Measure 5. Post-Construction Stormwater Management

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

<p>Permit Reference IV.C.5.a, c. (continued): Develop and implement a post-construction stormwater management program that addresses stormwater runoff from new development and redevelopment and will reduce the discharge of pollutants to the MEP. Program requirements should include:</p>	<p>Describe Measurable Goals and Results (when applicable) Indicate: Date Completed, Ongoing Task, or Scheduled Date (for next years activities)</p>
<ul style="list-style-type: none"> • Adequate resources for a program to inspect new and re-development sites and for enforcement and penalization of violators. • <i>Describe resources below. Update annually.</i> 	<p>DO NOT ENTER INFORMATION IN THIS CELL</p>
<p>As a private, non-traditional MS4 operator, the Authority is fully responsible for implementing post-construction management practices, as well as properly operating and maintaining them. Therefore, additional resources for program enforcement are not required.</p>	
<p>Additional Techniques (Completed in conjunction with the WNYSC)</p>	<p>Describe Measurable Goals and Results (when applicable) Indicate: Date Completed, Ongoing Task, or Scheduled Date (for next years activities)</p>
<p>None in Year 4</p>	
<p>Explain any changes or additions to the Permit Referenced Activities / Techniques, Measurable Goals and / or Scheduled Dates above and provide a reason(s) for the change: N/A</p>	

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

OVERALL MUNICIPAL POLLUTION PREVENTION / GOOD HOUSEKEEPING PROGRAM INFORMATION

<ul style="list-style-type: none"> • This table is for MS4s to report on their OVERALL Municipal Pollution Prevention / Good Housekeeping Program. • A separate table follows that is for MS4s to report on management practices performed in identified municipal operations. • Refer to the Municipal Pollution Prevention / Good Housekeeping Assistance document for example best management practices, policies and procedures. • Use separate rows to explain the different processes, activities, procedures, practices, etc. used by the MS4. Add additional rows as needed. 	
<p>Permit Reference IV.C.6.a: Develop and implement an operation and maintenance program to reduce and prevent pollutant discharges from municipal operations to the MEP.</p>	<p>Describe Measurable Goals and Results (when applicable) Indicate: Date Completed, Ongoing Task, or Scheduled Date (for next years activities)</p>
<ul style="list-style-type: none"> • <i>List pollutants that will be addressed by the municipal pollution prevention program.</i> 	
<p>AUTHORITY PROGRAM AND ACCOMPLISHMENTS</p>	
<p>The pollutants that are addressed by the municipal pollution prevention program include settleable materials (silt, etc.) and liquid materials that could be spilled from vehicles crossing the Peace Bridge (i.e., gasoline)</p>	
<ul style="list-style-type: none"> • <i>Set and describe pollution prevention priorities by geographic areas, municipal operation type, and facilities.</i> 	<p>DO NOT ENTER INFORMATION IN THIS CELL</p>
<p>The following management practices have been implemented by the Authority to reduce settleable materials:</p> <ul style="list-style-type: none"> • Street and Bridge Maintenance • Winter Road Maintenance • Stormwater System Maintenance • Vehicle and Fleet Maintenance <p>Standard operating procedures (SOPs) for these practices are defined in the Authority’s SWMP and are discussed in more detail in the following pages.</p>	<p>MEASURABLE GOAL – Revise operations and maintenance (O&M) practices and SOPs</p> <p>YEAR 4 RESULTS – This goal was accomplished in Year 4 in conjunction with the SWMP revision. The Authority’s SWMP was updated and revisions were issued in August 2006. A stand-alone SOP for the spill containment system (described below) was developed and incorporated in the SWMP during the Year 4 revision.</p> <p>SCHEDULE – On-going. Anticipated Year 5 revision date is June 2007.</p>
<p>The Authority installed an in-line spill containment system to prevent any spilled materials on the Peace Bridge from entering the Niagara River.</p> <p>The Authority has a standard operating procedure for personnel responding to an emergency, which includes spill response and containment procedures. This is reviewed and revised annually in conjunction with the SOPs described above. In addition, in Year 4 the Authority developed a stand-alone SOP for the spill containment system that was incorporated in the SWMP during the Year 4 revision. This SOP includes valve switch locations, purpose, potential hazards, spill response procedures, switch operation, emergency notification, and switch inspection procedures.</p>	

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

OVERALL MUNICIPAL POLLUTION PREVENTION / GOOD HOUSEKEEPING PROGRAM INFORMATION

<p>Permit Reference IV.C.6.a: Include a municipal pollution prevention training component for staff (where all staff are trained).</p> <ul style="list-style-type: none"> • <i>Explain activities and materials used to meet this requirement.</i> • <i>Identify training needs and design training component.</i> • <i>Determine the adequacy and appropriate frequency of staff training</i> • <i>Identify personnel or outside organization conducting activities.</i> 	<p>Describe Measurable Goals and Results (when applicable) Indicate: Date Completed, Ongoing Task, or Scheduled Date (for next years activities)</p>
<p>EMPLOYEE STORMWATER TRAINING - The Authority will organize and conduct training sessions for Authority employees on stormwater management. Topics will include, at a minimum, an overview of stormwater and the SPDES permit requirements; the potential impacts of illicit connections and discharges on stormwater and how they can be detected and eliminated; best management practices for stormwater management; review of the Authority’s Stormwater Management Program and standard operating procedures.</p> <p>Training materials were finalized by the Authority’s stormwater consultant in Year 4. A copy of the training presentation is attached. Training will be conducted by Authority’s health and safety coordinator every two years, starting in Year 5, and as necessary to update employees on major changes to the SWMP.</p>	<p>MEASURABLE GOAL – Train employees YEAR 4 RESULTS – This goal was not fully accomplished in Year 4. The Authority’s consultant developed training materials (PowerPoint presentation, handouts) in Year 4, but training was not conducted with Authority employees. Spill Awareness Training was conducted January 29, 2007 (attendance record attached). SCHEDULE – Initial training will be conducted in Year 5, and every two years thereafter.</p>
<p>WNYSC P2/GOOD HOUSEKEEPING TRAINING - On behalf of the WNYSC membership, Erie County Department of Environment & Planning staff conducted training for municipal staff on April 12 & 13, 2006 to assist them with implementation of P2/Good Housekeeping Best Management Practices within their municipalities. The WNYSC’s Pollution Prevention/Good Housekeeping for Municipal Operations: A Guidance Document of Best Management Practices & Inspection Checklists formed the basis of the training and was distributed to all in attendance. The PowerPoint training program has been made available for each municipality to use: www.erie.gov/environment/compliance/pollution_sw2</p>	<p>YEAR 4 RESULTS – Authority’s consultant attended the P2/Good Housekeeping training offered by WNYSC on April 13, 2006 at the ECC North Campus.</p>
<p>Additional Techniques</p>	<p>Describe Measurable Goals and Results (when applicable) Indicate: Date Completed, Ongoing Task, or Scheduled Date (for next years activities)</p>
<p>None in Year 4</p>	
<p>Explain any changes or additions to the Permit Referenced Activities / Techniques, Measurable Goals and / or Scheduled Dates above and provide a reason(s) for the change:</p> <p>Providing employee stormwater training was not fully accomplished in Year 4. The Authority’s consultant developed training materials (PowerPoint presentation, handouts) in Year 4, but training was not conducted with Authority employees and is moved to a goal for Year 5.</p>	

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

<ul style="list-style-type: none"> • Copy this page and give it to each municipal office or department responsible for reporting. • Put an 'X' in front of each municipal operation type addressed by the Municipal Pollution Prevention/Good Housekeeping Program in that office or department. • Refer to the Municipal Pollution Prevention / Good Housekeeping Assistance document for example best management practices, policies and procedures. • Use separate rows to explain the different processes, activities, procedures, practices, etc. used by the MS4. Add additional rows as needed. 	
<p>Permit Reference IV.C.6.a, c: Develop and implement an operation and maintenance program to reduce and prevent pollutant discharges from the municipal operation(s) indicated above to the MEP.</p> <ul style="list-style-type: none"> • Describe how the bulleted items below focus on pollutants addressed by the municipal pollution prevention program and the pollution prevention priorities. 	<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"> • Briefly describe or reference any existing policies and procedures • Briefly describe or reference any policies and procedures being developed 	<p>DO NOT ENTER INFORMATION IN THIS CELL</p>
<p>SPILL RESPONSE AND PREVENTION - The Authority has developed and implemented a standard operating procedure for personnel responding to an emergency, which includes spill response and containment procedures. The Authority also has a specific SOP for operation and maintenance of the in-line spill containment system.</p>	<p>YEAR 4 RESULTS: In-line spill containment valve inspected and tested June 2006. Spill Awareness Training conducted January 29, 2007 (attendance record attached).</p>
<ul style="list-style-type: none"> • Briefly describe or reference any existing best management practices • Briefly describe or reference any planned best management practices 	<p>DO NOT ENTER INFORMATION IN THIS CELL</p>
<p>STREET AND BRIDGE MAINTENANCE - The Authority Maintenance Staff cleans (sweeps) the Peace Bridge deck, United States Plaza, and associated roadways, sidewalks, and parking lots a minimum of four times each year, weather permitting. The first cleaning is typically conducted in spring (March or April) following the final snowmelt of the season, and on an "as-need" basis the remainder of the year.</p> <p>The Authority is proactive in maintaining the Peace Bridge and United States Plaza. The Authority has implemented an on-going work program to maintain the Authority-owned property, including pier repairs, deck maintenance, and stormwater conveyance system improvements.</p>	<p>YEAR 4 RESULTS: Roadways cleaned/swept weekly in Year 4. Approximately 10 cubic yards of sediment and debris removed from roadways in Year 4.</p>

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

<p>WINTER ROAD MAINTENANCE - The Authority made changes in its deicing procedures in an attempt to reduce stormwater sediment loadings and maintain the integrity of the bridge and roadways. Prior to the 2002-2003 winter season, a 7:1 sand-salt mixture was used for deicing purposes. However, the corrosivity of rock salt, coupled with maintenance issues resulting from sand in the storm sewers, led the Authority to look for other alternatives.</p> <p>The Authority is using two alternative deicing products that are targeted for specific application locations. A liquid deicer (Caliber® M2000, which is manufactured by Glacial Technologies) is applied on the bridge deck and between inspection points in the United States Plaza. This chemical was selected because of its low corrosion rate, which is just above that of distilled water. The liquid deicer is delivered in bulk and stored in a 6,000-gallon underground storage tank, from where it can be pumped onto an application vehicle.</p> <p>A treated salt (Magic Salt™) is utilized for deicing purposes in the remainder of the plaza and Authority parking lots. Like the liquid deicer, this product has no corrosive characteristics, and because it is treated, it lasts longer than traditional rock salt. To protect the stockpile of treated salt from the environment, it is stored in an above ground salt storage bin. During the summer months, any remaining salt from the previous winter season is moved adjacent to the piers underneath the Canadian side of the Peace Bridge for storage. While stored in this location, the salt reserve is covered to prevent exposure to the elements.</p>	<p>YEAR 4 RESULTS:</p> <p>Approximately 886 tons treated salt applied in Year 4.</p> <p>Approximately 4,500 gallons liquid deicer applied in Year 4.</p> <p>Months applied in 2006: March, April, October, November, December</p> <p>Months applied in 2007: January, February, March</p>
<p>STORMWATER SYSTEM MAINTENANCE - The Authority’s storm sewers, catch basins, and post-construction BMPs (i.e., oil/water separators) are inspected on an annual basis by the Authority Maintenance Staff to identify maintenance needs. This inspection is typically conducted in spring (March or April) following the final snowmelt of the season. A copy of the Authority’s detailed inspection form is attached.</p> <p>Stormwater conveyance facilities are cleaned on an “as-needed” basis in conjunction with the annual inspection, and as required following a spill incident. Typical maintenance procedures include removal of large debris and silt from stormwater facilities. When sewer maintenance needs exceed the capabilities of the Authority Maintenance Staff, the Authority will contract an outside firm, who is a certified waste hauler, to complete the required work.</p>	<p>YEAR 4 RESULTS:</p> <p>Catch basins were inspected 2 times during Year 4, in March 2006 and November 2006.</p> <p>Catch basins and storm sewers were cleaned once in May 2006.</p> <p>Oil/water separators were inspected and cleaned once in June 2006.</p>

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

<p>VEHICLE AND FLEET MAINTENANCE - The Authority owns and maintains a wash bay on the Canadian side of the Peace Bridge. All Authority-owned vehicles are washed on an “as-need” basis in this designated area, and the wash bay drains are connected to the sanitary sewer. Any vehicle or parts washing that is done on the United States side of the bridge is conducted in the Authority maintenance garage using an electric pressure washer. The floor drains in the maintenance garage are also connected to the sanitary sewer.</p> <p>Authority vehicle maintenance activities are primarily conducted off-site. Vehicles are taken to off-site maintenance shops for regular oil changes and major repairs. Minor vehicle maintenance, such as changing the oil in the Authority’s lawnmowers, is conducted in the maintenance garage in the United States plaza. Wastes generated from these activities are stored in a designated waste oil container. The Authority has a contract with a certified waste disposal contractor to remove and dispose of waste oil on an “as need” basis, when the designated container is full.</p>	<p>YEAR 4 RESULTS:</p> <p>Approximately 150 gallons waste oil removed by Authority contractor and taken to recycling facility in Year 4.</p> <p>Months waste oil removed in 2006: March, June, November</p>
<ul style="list-style-type: none"> • <i>Identify and describe the equipment and staff that are in place</i> 	<p>DO NOT ENTER INFORMATION IN THIS CELL</p>
<p>MANPOWER - The Authority Maintenance Staff performs all maintenance activities on the Authority’s stormwater collection system. There are thirteen (13) full-time Authority Maintenance Staff personnel.</p>	
<p>EQUIPMENT - The Authority owns and/or leases vehicles for use by Maintenance Staff crews. Equipment used for regular maintenance includes pickup trucks, vans, combination dump trucks and plow-sanders, a street sweeper, a flusher truck, tractor, and skid steer and wheel loaders.</p>	

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

- Copy this page and give it to each municipal office or department responsible for reporting.
- Put an 'X' in front of each municipal operation type addressed by the Municipal Pollution Prevention/Good Housekeeping Program in that office or department.
- Refer to the Municipal Pollution Prevention / Good Housekeeping Assistance document for example best management practices, policies and procedures.
- Use separate rows to explain the different processes, activities, procedures, practices, etc. used by the MS4. Add additional rows as needed.

Permit Reference IV.C.6.a, c (continued): Develop and implement an operation and maintenance program to reduce and prevent pollutant discharges from municipal operations to the MEP.	Describe Measurable Goals and Results (when applicable) Indicate: Date Completed, Ongoing Task, or Scheduled Date (for next years activities)
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<ul style="list-style-type: none"> • <i>Assess if existing programs adequately reduce and/or prevent pollutant discharges</i> • <i>Determine and list any operation type, location or facility that is in need of modification or updates.</i> 	DO NOT ENTER INFORMATION IN THIS CELL
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Based on visual observation, there has been a significant reduction in the amount of sediment in catch basins and on roadways as a result of the change in winter road maintenance techniques.	MEASURABLE GOAL – Audit facilities and identify problem areas YEAR 4 RESULTS – This goal was accomplished in Year 4 during the comprehensive system inspection completed the week of April 10, 2006. Recommendations are documented in the attached memorandum, and information gathered was used to update SOPs. NEW SCHEDULE – On-going.
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Permit Reference IV.C.6.a: If there is a training component for staff specific to these municipal operations: <ul style="list-style-type: none"> • <i>explain the activities and materials;</i> • <i>identify the personnel or outside organization conducting the activities.</i> 	Describe Measurable Goals and Results (when applicable) Indicate: Date Completed, Ongoing Task, or Scheduled Date (for next years activities)
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Additional Techniques	Describe Measurable Goals and Results (when applicable) Indicate: Date Completed, Ongoing Task, or Scheduled Date (for next years activities)
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None in Year 4	
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Explain any changes or additions to the Permit Referenced Activities / Techniques, Measurable Goals and / or Scheduled Dates above and provide a reason(s) for the change: The Measurable Goal of auditing facilities and identifying problem areas has been changed to an on-going task to ensure facilities are in continual compliance with the Authority's pollution prevention program.	
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Did you include any of the following documents as appendices? Put a mark each appended document.

- [APPENDIX A] Summary of public comments received on the annual report at the public presentation (**Required**)
- [APPENDIX A] Intended response to comments on the annual report (**Required**)
- Results of information collected and analyzed, including monitoring data; evaluation of assessment (modeling) of pollutant discharges, including modeling results and pollutant transport trends.
- Other [APPENDIX B] Authority Stormwater Website Content
- Other [APPENDIX C] 2006 Comprehensive Facility Inspection and Dye Testing Results Memorandum
- Other [APPENDIX D] Stormwater-Related Maintenance Tracking Form – Construction Site Inspection
- Other [APPENDIX E] Stormwater Training Presentation
- Other [APPENDIX F] Spill Awareness Training Attendance Record

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

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

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

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

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

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

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

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

Public Comments Received on Year Four Annual Report

1. When you give materials to schools, I hope they point out that there are ways kids can do their part. I find children get passionate about global problems, but often don't realize they can do something right where they are – and maybe emphasize how blessed we are to have ample water for consumption, recreation and industry.

Response: *Our K-12 education packages include six lessons/learning activities from the Project WET curriculum that provide students with a hands on learning experience. The lessons/activities focus on how our actions affect water quality. Additional educational resources included in the package are as follows: the Household Guide to Preventing Stormwater Pollution; a flyer promoting instructional support via Erie County DEP staff, (Enviroscape, stormdrain stenciling, cleanups, Project WET training, etc.); and a set of stormwater quiz cards.*

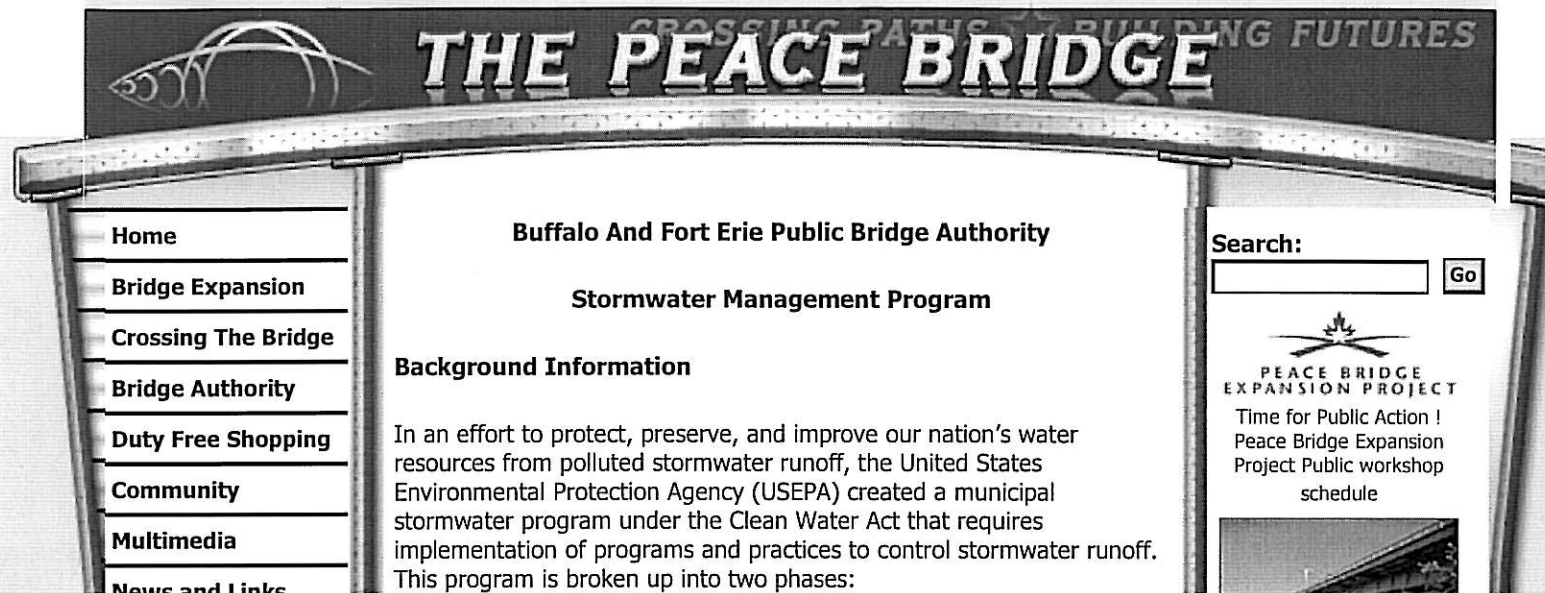
2. Relate the whole thing to global concerns and capture their interest when they are young. Adults are slow to change their bad habits, and I find being ecologically responsible doesn't seem like a burden if you have done it all your life.

Response: *The lessons/learning activities that comprise the K-12 education packages were selected in part due to the ease of tailoring the learning outcomes to a wide audience. Ultimately, teachers will utilize the resource at several grade levels thereby sustaining student exposure to the concepts at increasing levels of difficulty. The K-12 education packages will be updated every two years and redistributed.*

3. It was great to read about what you do.

Response: *The public is encouraged to review and comment on the work of the Western New York Stormwater Coalition and its participating municipalities. Although all Coalition meetings are open to the public, two times per year, in October and April, we actively seek public attendance through press releases and municipal contacts.*

APPENDIX B
AUTHORITY STORMWATER WEBSITE CONTENT



- [Home](#)
- [Bridge Expansion](#)
- [Crossing The Bridge](#)
- [Bridge Authority](#)
- [Duty Free Shopping](#)
- [Community](#)
- [Multimedia](#)
- [News and Links](#)

Traffic Volumes

BORDER TRAFFIC CONDITIONS
1-800-715-6722

USA

1 Peace Bridge Plaza
Buffalo, NY
14213-2494
(716) 884-6744
(716) 884-2089 Fax

Canada

10 Central Avenue
Fort Erie, ON
L2A 6G6
(905) 871-1608

Buffalo And Fort Erie Public Bridge Authority

Stormwater Management Program

Background Information

In an effort to protect, preserve, and improve our nation's water resources from polluted stormwater runoff, the United States Environmental Protection Agency (USEPA) created a municipal stormwater program under the Clean Water Act that requires implementation of programs and practices to control stormwater runoff. This program is broken up into two phases:

- Phase I addresses stormwater runoff from medium and large municipal separate storm sewer systems (MS4s) in areas with populations of 100,000 or greater.
- Phase II addresses stormwater runoff from small MS4s in urbanized areas.

The Buffalo and Fort Erie Public Bridge Authority (Authority) owns and operates a separate storm sewer system both in the United States and Canada, located on the Peace Bridge and adjacent Authority property. In the United States, this system is subject to Phase II stormwater regulations.

What Is Stormwater?

Stormwater is water from rain or melting snow that runs off into waterways rather than being absorbed into the ground. Flows can come from rooftops or run over paved areas, bare soil, and through sloped lawns. As it flows from/over the various surfaces, other materials become entrained and are transported along with it. Transported materials, also referred to as pollutants, include:

- Soil;
- Animal waste;
- Salt;
- Pesticides;
- Fertilizers;
- Oil and grease
- Debris and other potential pollutants

Stormwater, along with its entrained pollutants, travels through storm sewers and over land, eventually making its way into major bodies of water such as lakes, rivers, and streams. Because this discharge is untreated, it is referred to as *stormwater pollution*. Stormwater pollution threatens water quality which can make it unfit for swimming and can potentially kill fish and other aquatic life.

Many people are unaware that some of the basic everyday things can contribute to stormwater pollution. Washing a vehicle in the driveway, accidentally spilling some motor oil on the ground while fixing a car, or spraying the lawn to control insects and weed growth are just a few examples. Although the above examples are not rainfall related, they are still a type of surface runoff that can end up in the storm sewer and

Search:



Time for Public Action !
Peace Bridge Expansion
Project Public workshop
schedule



TRAFFIC WEB CAMS



E-ZPASS Information



FAST Program Info



Duty Free Americas



Peace Bridge Duty Free

ultimately in local water bodies.

The Authority's Stormwater Management Program (SWMP)

The Authority was proactively managing stormwater runoff even before the USEPA Phase II regulations were issued, and in March 2003 the Authority formally defined their program in a Notice of Intent that was submitted to the New York State Department of Environmental Conservation (NYSDEC). The SWMP includes both stormwater practices that the Authority is currently doing and new management techniques that will be implemented in the coming years. These include:

- Participating in the Western New York Stormwater Coalition
- Training employees in stormwater management
- Vehicle maintenance and washing in dedicated areas that drain to the sanitary sewer
- Parking lot and street sweeping to remove sediment
- Using deicers that do not contain sand or deteriorate pavement, thus minimizing the amount of sediment in stormwater runoff
- Utilizing structural controls, such as oil-water separators, to remove pollutants and floatable materials from stormwater

As part of the Phase II stormwater regulations, the Authority is required to report annually on the progress of the stormwater program. Copies of the Notice of Intent and Annual Reports are provided below.

Notice of Intent

Year 1 – Annual Report

Year 2 – Annual Report

What Can You Do To Help?

Public participation and involvement is the key to a successful stormwater management program. There are several ways to participate locally.

1. Become familiar with stormwater and the impacts it can have. Some useful stormwater-related websites and brochures are provided below:

WEBSITES

<http://cfpub.epa.gov/npdes/stormwatermonth.cfm>

<http://www.dec.state.ny.us/website/dow/mainpage.htm>

http://www.erie.gov/environment/compliance/pollution_sw2.asp

BROCHURES		
Automotive and Related Industries	Concrete and mortar Operations	Construction Site Stormwater Runoff Control
Pesticide Application, Laws Care and Landscaping	Hospitals, Medical Treatment Centers, and Healthcare Facilities	Mobil Cleaners: Carpet, Upholstery Cleaners, Janitorial Service Providers

Pools, Fountains, and Spas	Food and Restaurant Industries	Roadwork and Paving
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2. Get Involved!

- Attend stormwater-related community events and meetings. Information on these events is typically published in your local newspaper and is also listed below.
- Provide feedback on the Authority's SWMP. Your input is needed to ensure the stormwater program is a success. Contact information is provided below.

UPCOMING EVENTS AND IMPORTANT DATES

DATE(S)	EVENT	DETAILS
April 12, 2006	WNY Stormwater Coalition Public Meeting	2:00 pm - 3:30 pm Julia Boyer Reinstein Library 1030 Losson Road Cheektowaga, NY 14227
April 21-23, 2006	Spring Shoreline Sweep	www.fbnr.org
May 1-12, 2006	Draft Year 3 Annual Report Review	The draft report will be posted above for review and comment during this time frame

Contact Information:

For more information or to provide feedback, contact:

Anthony D. Braunscheidel Authority Facilities Manager	adb@peacebridge.com
Jaime Davidson	Jaime.Davidson@parsons.com

APPENDIX C

**2006 COMPREHENSIVE FACILITY INSPECTION AND
DYE TESTING RESULTS MEMORANDUM**

MEMORANDUM

July 20, 2006

To: Anthony D. Braunscheidel
Facilities Manager, Buffalo and Fort Erie Public Bridge Authority

From: Jaime M. Davidson, P.E.
Project Engineer, Parsons

Subject: 2006 Comprehensive Facility Inspection and Dye Testing Results
Buffalo and Fort Erie Public Bridge Authority
Peace Bridge Stormwater Drainage System Evaluation

In accordance with our contract, Parsons performed a comprehensive facility inspection to evaluate the condition and confirm the configuration of the Authority's stormwater collection system located in the United States Plaza and the Administration Building parking lot. For the purposes of this report, a stormwater facility is defined as a manhole, catch basin, drop inlet, scupper, floor drain or any other node in the storm sewer system that can be accessed from above-grade. Dye testing was also used, where necessary, to confirm the connection point of each drainage system component. The results of the facility inspection and dye testing task are summarized below.

SUMMARY OF WORK COMPLETED

Prior to beginning field work, Parsons reviewed the Authority's existing stormwater utility mapping to determine:

- The total quantity of stormwater facilities on the Authority's United States property
- The location and type of each of stormwater facility to be inspected
- Outfall locations. Seven stormwater outfall locations were identified that are all inter-municipal outfalls by definition. These seven outfalls are the locations where storm sewers cross a property line, flowing from the Authority's property to either property owned by the New York State Thruway Authority or the Buffalo Sewer Authority.
- Storm sewer drainage areas, or mini-systems. As recommended by the New York State Department of Environmental Conservation, the sewers connected to each outfall were traced, grouped as a mini-system, and each mini-system was outlined on the field maps.

A numbering convention was developed that incorporates the mini-system designation, and a number was assigned to distinguish and track each stormwater facility during the inspection. Nearly 200 facilities or locations were initially identified for inspection and given a tracking number.

2006 Comprehensive Facility Inspection and Dye Testing Results

July 20, 2006

Page 2

Field work associated with this task was completed during the week of April 10, 2006 under dry weather conditions. A comprehensive stormwater facility inspection was conducted on the first two days of field work, April 10 and 11. During this inspection, Parsons visually located and inspected each stormwater facility, including those recently installed and not identified on the existing map, recorded changes to the configuration of the stormwater collection system, and general observations of the collection system components. Each facility was inspected for general condition (i.e. debris present, flow, standing water), the number and orientation of influent/effluent pipes, and any miscellaneous observations (i.e. abandoned pipes, map discrepancies). During the comprehensive stormwater facility inspection, a total of 122 facilities were located and visually inspected.

After visual inspections were complete, Parsons dye tested facilities where the connection points were unclear or not able to be identified visually. Where possible, potable water was used as the primary tracing agent, and water colored with fluorometric dye was only introduced when potable water testing could not provide conclusive evidence of existing connection points. To complete a dye test, a Parsons technician flushed water from a hose, or poured approximately five gallons of water colored with fluorometric dye, into each drainage system component. A second technician was stationed near a storm sewer manhole downstream of the introduction point to identify where water was conveyed to. A total of seven tests were completed over a period of two days, April 12 and 13. The locations and results of each test are summarized in Table 1.

Parsons' visual inspection and dye testing field observations were recorded on individual inspection forms for each stormwater facility. Photographs of individual stormwater facilities were not taken for security reasons, and because sketches of each facility and associated piping were made on the inspection forms. Due to the large difference between the initial quantity of facilities identified and the number actually located, and to facilitate ease of mapping reviews in the future, Parsons re-numbered the identified stormwater facilities and revised the inspection forms accordingly upon completion of field work. Facility numbers and field notes are summarized in Appendix F.2 of the Authority's Stormwater Management Plan (SWMP), and detailed field inspection forms are provided in the SWMP, Appendix F.3. Parsons also updated existing stormwater collection system maps based on the findings of the field investigation. The revised map of the United States Plaza stormwater utilities is included in Appendix D of the SWMP.

Under this task, Parsons had originally allotted one-half day to stencil the drop inlets located on the United States portion of the Peace Bridge and in the United States Plaza. However, due to the numerous differences between existing mapping and field conditions, Parsons was required to do more inspection work and dye testing than was originally anticipated to confirm the existing stormwater drainage system alignment. Since development of a comprehensive system map is a requirement of the State Pollution Discharge Elimination System (SPDES) General Stormwater Permit (GP-02-02) and storm drain stenciling is not, Parsons gave the mapping task highest priority, and stenciling was not able to be completed in the budgeted time frame. Storm drain stenciling can still be undertaken as part of the 2007 work program, if desired.

RESULTS AND RECOMMENDATIONS

The results of Parsons' comprehensive stormwater facility inspections and dye testing are provided below. To facilitate review and implementation of this information, we have italicized recommendations and grouped the results and recommendations into three categories: 1) general recommendations, 2) observations and recommendations related to the Authority's structural and non-structural best management practices (BMPs), and 3) items that should be addressed by Authority Maintenance staff.

General Recommendations

1. **Storm Sewer Mapping** – Many catch basins and manholes were added / removed when the Plaza was remodeled and the new Duty Free store constructed. *Parsons recommends that Authority have the existing utilities (i.e., storm, sanitary, water, electrical) surveyed to ensure the accuracy of existing mapping.* The revised storm sewer map provided in Appendix D is not to scale and was developed for reference only.
2. **Additional Dye Testing and Closed Circuit Television (CCTV) Inspection** – Through initial dye testing, Parsons confirmed that part of the Authority's stormwater drainage system is combined; that is, both stormwater and sanitary wastewater are conveyed in the same pipe. The existing map indicates that these sewers may connect to a sanitary main owned by the Buffalo Sewer Authority; however Parsons was not able to confirm this through the dye testing completed this year. *Parsons recommends completing additional dye testing of these sewers and CCTV inspection, where necessary, to determine if an illicit connection exists.* In addition, connection points in several areas of the storm sewer system are still unclear and additional dye testing and CCTV inspection would confirm how these pipes are connected. Based on the results of the field investigation, Parsons has developed the proposed work plan in Table 2 for the Authority's consideration.
3. **Outfall Sampling** – The Western New York Stormwater Coalition (WNYSC) has secured grant funding to complete an outfall sampling pilot project. The purpose of this project is to aid MS4s in identifying illicit connections by sampling outfalls and having the water tested for potential sanitary wastewater contaminants. As a member of the WNYSC, the Authority can take advantage of this free opportunity to have outfalls sampled and tested, which may help determine whether or not odors observed during the field inspection are related to sanitary wastes. Therefore, *Parsons recommends that the Authority volunteer to participate in the WNYSC outfall sampling pilot project.*

BMP-Related Recommendations

4. **Vehicle Washing Procedures** - Parsons' field team noticed that trucks and other maintenance vehicles are being washed down over the catch basin in front of the salt shed (behind the maintenance building). This catch basin, which is facility 2011, ties into a storm sewer catch basin just off the Authority's property and drains to the Niagara River. In accordance with the Authority's SWMP, washing activities should take place either in the Canadian wash bay area or inside the maintenance garage, where drains are connected

to the sanitary sewer. *To prevent excessive sediment from being introduced into the stormwater drainage system, Parsons recommends:*

- That the Authority immediately inform employees that vehicles are to be washed in designated areas only.
 - That this catch basin be stenciled with “NO DUMPING-STORM SEWER.”
 - Or, if washing activities must be undertaken in this area, that a sediment control measure be placed around the catch basin prior to cleaning, such as a moveable dike or sandbags, or a structural best management practice be installed inside this catch basin.
5. **Salt Storage Procedures** - The salt shed located behind the maintenance building is open on one side, and the floor in this area is sloped to drain to catch basin 2011. Salt trucks entering and exiting the shed have the potential to drop salt in excess of typical application amounts that may enter the adjacent catch basin and impact water quality. To reduce the potential impact, *Parsons recommends placing a sediment control measure around the catch basin prior to salt loading/unloading activities, such as a moveable dike or sandbags, and cleaning up any spilled salt immediately when it is observed.*
6. **Evaluate New Facilities** - There are a number of trench drains and catch basins located in customs areas that frequently have vehicles sitting idle directly over of them. As a result, there is a high potential for vehicle-related fluids to discharge to these stormwater facilities. *Parsons recommends that an evaluation be completed to determine if installing additional structural best management practices, such as an oil/water separator or catch basin inserts, in the United States Plaza is feasible and appropriate.* In particular, installing a new oil/water separator downstream of storm manhole 1093 and catch basin inserts in facilities 1094, 1095, 1097, and 2011 may improve stormwater quality prior to discharge from the Authority’s property.
7. **Catch Basin Grates** – Existing catch basin grates cannot be removed. *To facilitate sewer maintenance, the Authority may want to consider replacing catch basin grates with grates that have the ability to be opened.*

Maintenance Items

8. **Address Flow Restrictors in Manholes** - Catch Basins 1107, 1110, 1111, and 1112, located in the maintenance building vicinity, each have a “capped” pipe and the cap appears to be a flow restrictor. *If the caps are no longer needed or their reason is unknown, they should be removed so that stormwater flow is not inhibited.*
9. **Cleaning** – At the time of inspection, a majority of the stormwater facilities had evidence of accumulated sediment and debris, making it difficult to fully inspect each facility. *Parsons recommends that the catch basins and manholes be visually inspected and cleaned a minimum of twice a year, once in spring and once in fall.* Special attention should be paid to the scuppers on the bridge, as well as the catch basins located on the shoulders of roadways, because these areas are more susceptible to accumulate debris (i.e. leaves, silt/sediment, and trash).

10. **Investigate Facility 2001** – An unknown 4-inch pipe was observed in this catch basin during the field inspection. The pipe runs toward the park adjacent to Authority property and may be associated with construction work being completed in this area. *The source of this pipe needs to be determined to ensure that an illicit connection has not been made to the storm sewer, which ultimately discharges to the Niagara River.*
11. **Former Coal Storage Bin** - The large “collection sump” (Facility 1072) located just west of Customs vehicle inspection lanes 5, 6, and, 7 is not connected to the stormwater conveyance system and does not drain anywhere. According to the Peace Bridge Supervisor who accompanied the field crew on April 11, 2006, this location was once a coal storage bin for the original Peace Bridge building. The coal shoots leading into the bin are still visible on the western side of the sump. *Parsons recommends that the Authority monitor this facility, as it may require periodic cleaning or structural maintenance. In the long-term, the Authority may want to consider backfilling and paving over this structure to permanently eliminate it from the plaza.*
12. **Open and Trace Floor Drains** - There are two floor drains located in the Customs Vehicle Inspection Garage and four in the Maintenance Garage that drain to an unknown location. Each floor drain has a “clean-out” pipe that is closed off and must be manually opened in order to draw down accumulated water. At the time of inspection, each drain had standing water with oil and debris in it, and the cleanout was unable to be opened for dye testing. *To confirm the connection point of these facilities, the cleanouts need to be opened. If the Authority is able to open them, Parsons can dye test these facilities as discussed under recommendation #2. Also, the Authority should establish a regular cleaning schedule to minimize the amount of water and debris accumulation in these areas.*

**Table 1
 Dye Testing Summary**

Test No.	Start Location	End Location	Test Method	Comments
1	1056	1093	Water	Tested two pipes at this location; the first was SE pipe and second was SW pipe which proved to be a dead end.
2	1071	1093	Water	Test confirmed that a stormwater line still exists in front of the Customs booths that was removed from current map.
3	1088	Unknown	Dye	Dye backed up into 1089, connection to main line must be clogged; large amount of debris and silt in trench drains.
4	1101	1103	Water	Map illustrated that 1101 was not connected to 1100. Map corrected.
5	Maintenance Building Lavatory	1113	Dye	Dye was flushed down toilet in Men's 1st floor bathroom and came out into 1113. Dye also observed in 1118.
6	1116	1118	Dye	Due to the depth of this manhole causing poor visibility, a dye test was done to confirm its connection.
7	1113	1116/1118	Dye	Dye test confirmed that flow goes from here to 1116 and then 1118. Flow from test came out of same pipe in 1118 as in Test # 6.

**Table 2
 Proposed Workplan for Additional Dye Testing and CCTV**

Run No.	Start Location	End Location(s)	Test Method	Objective
1	1002	1012	Water	Confirm connection point for scupper 1002
2	Catch Basin Busti Ave	1010	Water	Confirm this catch basin drains to 1008 and onto Authority property
3	1034	1035/1033	Water	Confirm flow direction and connection point
4	1032	1030/1033	Water	Confirm flow direction and that pipe between 1032 and 1030 is abandoned
5	1030	1031	Water	Confirm flow direction and connection point
6	1040	1046	Water	Confirm flow direction and connection point
7	1042	1045	Water	Confirm flow direction and connection point
8	1044	1045	Water	Confirm flow direction and connection point
9	1050	1051	Water	Confirm whether or not crossover pipe exists
10	1051	1052/1050	Water	Confirm flow direction
11	1065	1066/1067	Water	Confirm flow direction and connection point
12	1073	1074/1075	Water	Confirm flow direction and connection point
13	1078	1076/1093	Water	Confirm whether or not crossover pipe exists
14	1094	1096/1103	Water	Confirm that 2-10" pipe is abandoned
15	1095	1096/1103	Water	Confirm that 2-10" pipe is abandoned
16	1097	Unknown	Water	Determine facility connection point
17	1098	Unknown	Water	Determine facility connection point
18	1099	Unknown	Water	Determine facility connection point
19	1105	1108	Water	Confirm flow direction through 1108
20	1106	1108	Water	Confirm flow direction through 1108
21	1107	1108	Water	Confirm flow direction through 1108
22	1118	MH off prop.	Dye	Determine direction of flow from 1118
23	1115	1118	Dye	Confirm pipe connects 1116 and 1118
24	1112	1113	Dye	Confirm flow direction through 1113
25	USSN-1001	Unknown	Dye	Confirm sanitary manhole is not connected to storm system

**Table 2 (cont.)
Proposed Dye Testing and CCTV Workplan**

Run No.	Start Location	End Location(s)	Test Method	Objective
26	USSN-1002	Unknown	Dye	Confirm sanitary manhole is not connected to storm system
27	Admin. Bldg. Lavatory	1036	Dye	Confirm sanitary sewers are not connected to storm system
28	1056	Unknown	CCTV	Determine connection points of 2" and 8" pipes
29	1103	1104	CCTV	Inspect outfall 1104
30	1109	Unknown	CCTV	Determine connection point
31	1113	1114	CCTV	Confirm that pipe is abandoned / inspect outfall 1114
32	1116	1118	CCTV	Inspect outfall 1117
33	1118	Unknown	CCTV	Confirm combined sewer discharge location
34	2009	2010	CCTV	Inspect outfall 2010
35	2011	2012	CCTV	Inspect outfall 2012

APPENDIX D

**STORMWATER-RELATED MAINTENANCE TRACKING FORM
CONSTRUCTION SITE INSPECTION**

**Buffalo and Fort Erie Public Bridge Authority
Stormwater-Related Maintenance Tracking Form**

Year: _____

Form Maintained By: _____

Construction Site Location: _____

Construction Site Inspection

Date Completed	Conducted By	Approved Sediment Control Devices in Use? (Yes/No)	Sediment Control Devices Functional? (Yes/No)	Maintenance or Repairs Needed? (Yes/No)	Comments/Observations

<p>Best Management Practices:</p>	<ol style="list-style-type: none"> 1. Erosion and sediment control devices in use should match those approved by Engineer. 2. Erosion and sediment control devices should be erected and operating as designed. 3. If erosion and sediment control devices are in disrepair or are not approved, inform construction inspector. 4. Contractor responsible for correcting deficiencies within 24 hours.
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APPENDIX E
STORMWATER TRAINING PRESENTATION



Buffalo and Fort Erie Public Bridge Authority



Stormwater Management Program Training *INSERT DATE*



PARSONS TRANSPORTATION GROUP



Presentation Outline

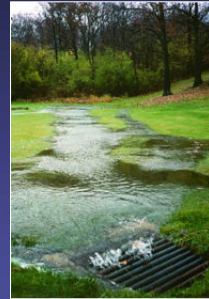
- Stormwater Overview
- National Stormwater Regulations
- The Authority's Stormwater Management Program
 - ◆ Six Minimum Control Measures
 - ◆ What We are Doing
 - ◆ What You Can Do at Work and at Home



PARSONS TRANSPORTATION GROUP

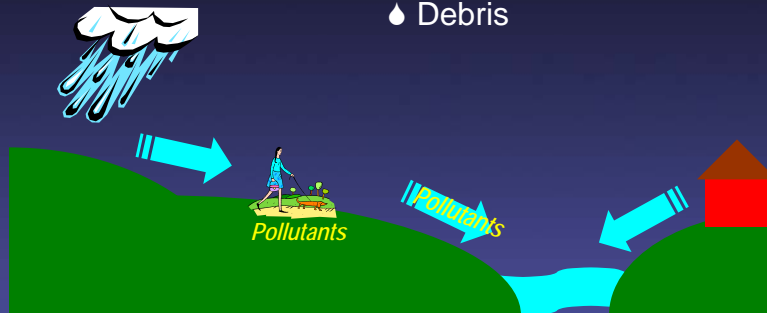
Stormwater Overview

- What is Stormwater?
 - ◆ Water from rain or melting snow that runs off into waterways rather than being absorbed into the ground
- As stormwater flows over surfaces, other materials become entrained and are transported to bodies of water such as the **Niagara River** and **Lake Erie**
- Stormwater runs off over:
 - ◆ rooftops
 - ◆ paved areas
 - ◆ bare soil
 - ◆ sloped lawns.



Stormwater Overview

- Stormwater pollutants can include:
 - ◆ Soil
 - ◆ Animal waste
 - ◆ Salt
 - ◆ Pesticides
 - ◆ Fertilizers
 - ◆ Oil and grease
 - ◆ Debris





National Stormwater Regulations

- Stormwater Management required under Clean Water Act
 - ◆ Stormwater Phase I (1990) – large and medium MS4 operators (population > 100,000)
 - ◆ Stormwater Phase II (1998) – small MS4 operators (urbanized areas with population < 100,000)
- Definitions
 - ◆ MS4 - Municipal Separate Storm Sewer System
 - ◆ Urbanized Area – an area where the population is at least 50,000 and the overall population density is at least 1,000 people per square mile based on the 2000 Census
- In New York, DEC is responsible for administering stormwater permits under the State Pollution Discharge Elimination System (SPDES)



PARSONS TRANSPORTATION GROUP



National Stormwater Regulations

- The Authority owns and operates a small MS4 both in the United States and Canada, located on the Peace Bridge and adjacent Authority property.
- As a result, the Authority was required to:
 - ◆ File a Notice of Intent (NOI) to obtain coverage under the SPDES general stormwater permit.
 - ◆ Develop a Stormwater Management Plan to ensure that the requirements have been and will continue to be addressed.



PARSONS TRANSPORTATION GROUP



The Authority's Stormwater Management Program (SWMP)

- Local stormwater focus:
 - ◆ Reduce sediment entering Lake Erie and Niagara River
- SWMP must be fully implemented by March 2008
- Six Minimum Control Measures are required under the general permit:
 - ◆ Public Education & Outreach
 - ◆ Public Participation / Involvement
 - ◆ Illicit Discharge Detection and Elimination
 - ◆ Construction Site Runoff Control
 - ◆ Post-Construction Runoff Control
 - ◆ Pollution Prevention / Good Housekeeping



PARSONS TRANSPORTATION GROUP



1. Public Education and Outreach

- What we are doing:
 - ◆ Participating in the Western New York Stormwater Phase II Coalition
 - ◆ Maintaining a stormwater website
 - ◆ Stormwater brochures and poster in Administration Building
 - ◆ Assist with local stormwater events

- What you can do at work and home:
 - ◆ Attend local stormwater events
 - ◆ Educate yourself about stormwater issues



PARSONS TRANSPORTATION GROUP



Stormwater Management Program Website

<http://www.peacebridge.com/stormwater.php>

- Contains information to increase Public Awareness and Involvement
 - ◆ Calendar of Events
- Contains PDFs of the Notice Of Intent and all of the Annual Reports to date
- Links to other stormwater related information
 - ◆ pamphlets / brochures
 - ◆ Stormwater coalition website
 - ◆ NYSDEC
 - ◆ Environmental Protection Agency Stormwater Outreach Materials

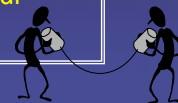


PARSONS TRANSPORTATION GROUP



2. Public Involvement/Participation

- What we are doing:
 - ◆ Designated a stormwater contact – Tony Braunscheidel
 - ◆ Posting Authority's stormwater reports and documents on website for review and comment
 - ◆ Annual presentation on our stormwater program progress
 - ◆ Coalition meetings open to public
 - ◆ Information about local stormwater events on website
- What you can do at work and home:
 - ◆ Attend local stormwater events
 - ◆ Provide feedback on our program by contacting Tony Braunscheidel, or the program in your community



PARSONS TRANSPORTATION GROUP



3. Illicit Discharge Detection and Elimination

- **Illicit discharges are PROHIBITED on Authority property**
- Illicit connections/discharges can enter the system in many ways
 - ◆ **Direct Connections**
 - Wastewater piping either mistakenly or deliberately connected to the storm drains
 - ◆ **Indirect Discharges**
 - infiltration from cracked sanitary systems
 - spills collected by drain outlets
 - Materials dumped directly into a drain, including paint, used oil, chlorinated swimming pool water, soapy water
- Whether the source is direct or indirect, the result is untreated pollutant-carrying discharges to the receiving water body. This has a serious effect on water quality and threatens wildlife as well as human and aquatic health.



PARSONS TRANSPORTATION GROUP



Illicit Connections & Discharges How Can They Be Identified?

1. Know Your System!
 - Map storm drains accurately to avoid illegal discharges
 - Label manholes, catch basins, and other related storm conveyances so that there is no mistake as to which system it is connected to
2. Conduct regular Field Inspections
 - Check the integrity of the manholes, catch basins, and other drains
 - Make note of any unusual flows, excessive debris, odor or any other items that may contribute to stormwater pollution
 - Report any suspicion or observable illegal connections or discharges
3. Dye Test areas of question to find out the source for the discharge



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3. Illicit Discharge Detection and Elimination

- What we are doing:
 - ◆ Inspecting storm sewers annually
 - ◆ Updating storm sewer maps
 - ◆ Training employees on illicit discharges
 - ◆ Prohibit illicit discharges on property

- What you can do at work and home:
 - ◆ Do not dump anything down storm sewers
 - ◆ Do not wash vehicles over storm sewers
 - ◆ Notify stormwater contact if you see illicit dumping or observe unusual stormwater characteristics (color, odor, debris)



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4. Construction Site Stormwater Runoff Control

- What we are doing:
 - ◆ Require erosion and sediment controls during construction (included in project specifications)
 - ◆ Review design documents for stormwater compliance
 - ◆ Provide opportunity for public comment on construction documents
 - ◆ Inspect construction sites to ensure controls are in use and operating properly
 - ◆ Attend construction site inspection training



- What you can do at work and home:
 - ◆ Provide feedback on construction documents
 - ◆ Notify stormwater contact if you observe excessive sediment runoff during construction or controls (i.e., silt fence, hay bales) in poor condition



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5. Post-Construction Stormwater Management

- What we are doing:
 - ◆ Utilize structural controls, such as oil-water separators, to remove pollutants and floatable materials from stormwater
 - ◆ Inspect and clean storm sewer system annually
- What you can do at work and home:
 - ◆ Notify stormwater contact if you observe excessive sediment or debris in catch basins

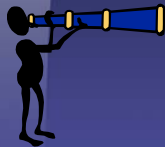


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6. Pollution Prevention / Good Housekeeping

- What we are doing:
 - ◆ Conduct training on good housekeeping practices
 - ◆ Sweep roadways a minimum of 2 times each year
 - ◆ Inspect and clean catch basins and storm sewers up to 4 times each year
 - ◆ Maintain bridge deck and roadways (i.e., patch asphalt) to minimize sediment
 - ◆ Maintain spill containment system to capture materials in the event of a spill on the bridge
 - ◆ Clean and perform vehicle maintenance ONLY in designated areas that drain to sanitary sewer
 - ◆ Properly dispose of vehicle maintenance fluids
 - ◆ Use deicers that do not contain sand or deteriorate pavement
 - ◆ Store road salt in covered area, and inspect to ensure proper application rates



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6. Pollution Prevention / Good Housekeeping

•What you can do at work and home:

- ◆ Do not dump anything down storm sewers
- ◆ Do not wash vehicles near storm sewers
- ◆ Clean and perform vehicle maintenance **ONLY** in designated areas that drain to sanitary sewer
- ◆ Properly dispose of vehicle maintenance fluids
- ◆ Notify stormwater contact if you observe excessive sediment or debris in catch basins
- ◆ Clean up non-hazardous spilled materials immediately

Refer to handout for additional good housekeeping practices



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Questions?

Stormwater Contact

Anthony Braunscheidel, Facilities Manager
(716) 884-6744 ext. 242
adb@peacebridge.com

<http://www.peacebridge.com/stormwater.php>

Additional Information

Jaime Davidson, Parsons
(716) 633-7074 ext. 245
jaime.davidson@parsons.com



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APPENDIX F
SPILL AWARENESS TRAINING ATTENDANCE RECORD

Topic of Training: Spill Awareness Date: 1/29/07

Trainer: Dale Jerge Time (from - to): 1pm-3pm

Subcontractor: NCCC Contract Number: _____

Grantee: Peace Bridge Authority Location: on site

Sign-in Sheet

07-127-05

	Print Name	Signature	
1	FRANK BATTAGLIA	<i>[Signature]</i>	
2	Carol Putman	Carol Putman	
3	JOHN HERRON	<i>[Signature]</i>	
4	Bonnie Fairgrieve	<i>[Signature]</i>	
5	Scott Smith	<i>[Signature]</i>	
6	NEIL GUNN	<i>[Signature]</i>	
7	RANDY MCDONALD	<i>[Signature]</i>	
8	GORD ADIE	<i>[Signature]</i>	
9	J R BLOSS	<i>[Signature]</i>	
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25	CLIENT	INSTRUCTOR	

Topic of Training: Spill Awareness Date: 1/29/07

Trainer: Dale Jerge Time (from - to): 3pm-5pm

Subcontractor: NCCC Contract Number: _____

Grantee Peace Bridge Authority Location: _____ on site

Sign-in Sheet

07-127-05

	Print Name	Signature	
1	Michael Hymes	Michael Hymes	
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