



INTERIM WATER QUALITY IMPROVEMENT STRATEGY

ENHANCED REQUIREMENTS FOR PHOSPHORUS IMPAIRED WATERS

1.0 General:

Part VIII of the General Permit GP-0-24-001 directs the TOWN to implement, in addition to the applicable requirements of the six (6) MCMs in Part VI of the SPDES General permit of Stormwater Discharges from MS4 systems, (GP-0-24-001) enhanced Best Management Practices (BMP's) for the sewershed areas of Thomas Creek / White Brook, which is listed as an impaired water in Appendix C of GP-0-24-001.

2.0 Enhanced Water Quality Elements:

The additional pollutant specific BMPs for Phosphorus impaired waters include eight (8) specific strategy elements as listed and described below.

2.1 Mapping

- *Permit Requirement*

In accordance with the timeframes listed below, the MS4 Operator must update, in geographic information system (GIS) format with a scale of 1:24,000 or finer, the comprehensive system mapping (Part IV.D.) to include:

- Within three (3) years of the EDC, MS4 infrastructure mapping requirements (Part IV.D.2.b.i.) and sewersheds for each:*
 - MS4 outfall; and*
 - ADA MS4 outfall.*
- Within three (3) years of the EDC, the following information for each MS4 outfall:*
 - Retail and wholesale plant nurseries (including big box stores);*
 - Commercial lawn care facilities; and*
 - Golf courses.*
- Within three (3) years of the EDC, ADA MS4 outfalls.*

- **Compliance Strategy**

The TOWN currently meets the *a.i* and *a.ii* requirement listed above through its active and comprehensive GIS mapping program. This program contains dataset layers that include the **Outfalls** and **Stormsewer Collection Areas** for both MS4 and ADA outfalls.

The TOWN is not complete with the requirements of *b.i*, *b.ii*, and *b.iii* listed above, but will incorporate that information into the **Outfall** dataset layer.

The TOWN currently meets the *c* requirement listed above through its active and comprehensive GIS mapping program. This program contains dataset layers that include the **Outfalls** and **Stormsewer Collection Areas** for both MS4 and ADA outfalls.

2.2 Public Education and Outreach

- *Permit Requirement*

- Within six (6) months of the EDC, the MS4 Operator must make available information on how the impairment is being addressed by implementation of the MS4 Operator's local law or legal mechanism with content equivalent to the model local law (Part IV.E.1 and Part IV.E.2.). MS4 Operators must document the completion of this requirement in the SWMP Plan. 93 Part VIII.A.*
- Following the completion of Part VIII.A.1 (above), twice a year, once from March to August and once from September to February, the MS4 Operator must provide educational messages with information specific to phosphorus to the applicable target audiences within the sewersheds for impaired waters listed in Appendix C focus area, identified in Part VI.A.1.b. or Part VII.A.1.b, depending on the MS4 Operator type. The SWMP Plan must be updated with changes made to public education and outreach program (Part VI.A or Part VII.A, depending on the MS4 Operator type). MS4 Operators must document the completion of this requirement in the SWMP Plan.*

- *Compliance Strategy*

The TOWN is in general conformance with permit requirement *a* listed above. The TOWN adopted a local law in July of 2010 that was modelled after the 2006 NYSDEC Model IDDE Local Law and the 2006 NYSDEC Model Stormwater Management and Erosion & Sediment Control Law. The TOWN's local law is Chapter 119 of the Perinton Town Code and is entitled "Erosion and Sediment Control". This local law is included in Appendix A of the SWMP Plan and has gone largely unchanged since its adoption in 2010.

The adoption and implementation of this local law provides the Town with the legal mechanism to control and regulate development (both during and after construction), as well as inspect and eliminate illicit types of water discharges that enter the stormsewer drainage system from the built environment. This is important because Phosphorus can be a dissolved or particulate pollutant of concern; meaning that there are many ways for Phosphorus to enter the natural environment as a pollutant. Sources of phosphorus in urban stormwater run-off often come from plant and leaf litter, soil particles (erosion and sediment transport), road salt, fertilizer from lawn/landscaped areas, pet wastes, and other organic wastes found in sewage or industrial effluent. The primary purpose of Perinton's Erosion & Sediment Control Law is to lessen the impacts of Phosphorus in stormwater run-off by:

- Acknowledging that land disturbing development projects and associated increases in impervious cover alter the hydrologic response of local watersheds and increase stormwater runoff rates and volumes, as well as can cause stream

channel erosion, and sediment transport and deposition. This stormwater runoff contributes to increased quantities of waterborne pollutants.

- Understanding that stormwater runoff, soil erosion and nonpoint source pollution can be controlled and minimized through the regulation of stormwater runoff from development sites through Chapter 119 of the Perinton Town Code.
- Prohibiting non-stormwater discharges from entering the stormsewer/drainage system.
- Establishing minimum stormwater management requirements and controls as well as policies for water quality and quantity standards that provide reasonable guidance for the regulation of stormwater runoff and, in addition to the above, safeguard property, and prevent damage to the environment.
- Regulating stormwater runoff discharges from land development projects and other construction activities in order to control and minimize increases in stormwater runoff rates and volumes, stream channel erosion, and nonpoint source pollution associated with stormwater runoff is in the public interest and will prevent threats to public health and safety.
- Requiring the creation and implementation of a Stormwater Pollution Prevention Plan that utilizes soil stabilization best management practices and activities to be implemented to eliminate or reduce pollutant discharges from exposed soils to stormwater conveyance systems and/or receiving waters.
- Creating an enforcement mechanism that holds persons accountable for violating these requirements.

The TOWN is not complete with the requirements of *b* listed above.

2.3 Public Involvement/Participation

- *Permit Requirement*

No Additional requirements necessary.

- Compliance Strategy

Not Applicable

2.4 Illicit Discharge Detection and Elimination

- *Permit Requirement*

Following the completion of Part VIII.A.1, within five (5) years of the EDC, the MS4 Operator must include on the MS4 outfall inventory (Part VI.C.1.c. or Part VII.C.1.c, depending on the MS4 Operator type) the number of each item identified in Part VIII.A.1.b. for each associated MS4 outfall.

- Compliance Strategy

The TOWN is not complete with the requirements listed above, but will incorporate that information into the **Outfall** dataset layer (inventory).