

Stormwater Management Plan (SWMP)

Town of Haverstraw, New York

Prepared for:
Town of Haverstraw
1 Rosman Road
Garnerville, NY 10923

Prepared by:
TAMBLIN
ENGINEERING, PLLC
Tamblin Engineering, PLLC
PO Box 142
Manlius, NY 13104
P: 315.952-1863

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1.0 INTRODUCTION

This Stormwater Management Plan (SWMP) has been prepared for the Town of Haverstraw to address the MS4 system requirements and oversight. The purpose of the Plan is to ensure the reduction of Pollutants of Concern (POCs) identified herein from stormwater discharges to the maximum extent practicable. This Plan is written in accordance with New York State Department of Environmental Conservation's (NYSDEC's) SPDES MS4 General Permit for Stormwater Discharges from Municipal Separate Storm Sewer Systems (hereinafter, the MS4 General Permit), which requires that covered entities develop, implement, and enforce a SWMP designed to reduce the discharge of pollutants to MEP in order to protect water quality and to satisfy the appropriate water quality requirements of the Environmental Conservation Law and the Clean Water Act. The Plan will be maintained with the Town's Stormwater Management Program (SWMP) documentation at Town Hall located at 1 Rosman Road, Garnerville NY 10923. Per the MS4 General Permit requirements, the Plan will be periodically assessed and modified as needed to address measurable goals and select and implement the appropriate measures needed.

The Stormwater Consortium of Rockland County, run by Cornell Cooperative Extension (CCE), was formed to allow for a collaborative approach to meeting the MS4 General Permit requirements and addressing water quality concerns. The Consortium is comprised of all 24 Municipal Separate Storm Sewer Systems (MS4s) within Rockland County, including the Town. Establishing a Consortium and a partnership with CCE has provided a platform for the exchange of information and ideas for meeting the MS4 General Permit requirements, and has enhanced outreach, education, and training opportunities.

The NYSDEC MS4 General Permit and Forms webpage will be utilized on an on-going basis for further guidance (<https://www.dec.ny.gov/chemical/43150.html>).

2.0 WHAT IS AN MS4?

An MS4 is a Municipal Separate Storm Sewer System, or the entirety of the storm sewer system that is maintained within the municipal boundaries. The MS4 system is typically entirely inclusive of storm sewer lines and would not include the sanitary system, with the exception of combined sewers systems. There are no combined sewers in Rockland County (<http://www.dec.ny.gov/pubs/103459.html>).

3.0 HOW WAS THE MS4 PROGRAM ENACTED?

The Phase II Stormwater Program was implemented by the Environmental Protection Agency in an effort to improve the Nation's waters from polluted stormwater runoff. Phase I of the program was implemented in 1990 under the Clean Water Act and relies on National Pollutant Discharge Elimination System (NPDES) permit coverage to address stormwater runoff from MS4s typically servicing populations of 100,000 or greater.

The Phase II effort is United States Environmental Protection Agency's (USEPA's) next step effort to protect water resources from polluted stormwater runoff. The Phase II program expands to the Phase I program by addressing stormwater runoff from urbanized MS4s servicing populations smaller than 100,000. Phase II relies on individual State permit coverage to address stormwater runoff from such MS4s.

The Town, a small, urbanized entity with a population of 38,797 (per 2023 Census), fits into the category of a “small MS4” under the Phase II Stormwater Program and is, therefore, required to abide by the terms and conditions of the MS4 General Permit. The MS4 General Permit was enacted and is enforced by the regulatory oversight agency, the NYSDEC. The Town falls under the requirements of a traditional land-use control MS4 per the MS4 General Permit.

4.0 EXEMPTIONS AND LIMITATIONS ON COVERAGE

The following discharges from MS4 operators are exempt from the requirements of the MS4 General Permit:

- Stormwater discharges associated with industrial activity provided the discharges are covered by the SPDES Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity, GP-0-23-001 (MSGP).
- Individual SPDES permitted stormwater discharges provided the discharges are in compliance with their individual SPDES permit limitations.

The following discharges from MS4 operators are not authorized by this SPDES General Permit:

- Stormwater discharges that may adversely affect an endangered or threatened species, or its designated critical habitat, unless the MS4 operator has obtained a permit issued pursuant to 6 NYCRR Part 182 or the Department has issued a letter of non-jurisdiction.
- Stormwater discharges which adversely affect properties listed or eligible for listing in the National Register of Historic Places unless the covered entity is in compliance with requirements of the National Historic Preservation Act and has coordinated with the appropriate State Historic Preservation Office any activities necessary to avoid or minimize impacts.
- Stormwater discharges, the permitting of which is prohibited under 40 CFR 122.4 and 6 NYCRR 750-1.3.
- The discharge of vehicle and equipment wash water from municipal facilities, including tank cleaning operations.

All documentation necessary to demonstrate discharge eligibility (Part I.B.1. and Part I.B.2.) must be documented in the SWMP (Part IV.B.).

5.0 OBTAINING PERMIT COVERAGE

An electronic MS4 Notice of Intent form was completed and submitted by the Town on February 16, 2024.

6.0 WATER QUALITY IMPROVEMENT STRATEGIES FOR IMPAIRED WATERS

6.1 Waterbodies of Concern

While there are no 303-D listed waterbodies within the Town MS4, the Town has identified the Minisceongo Creek, the Hudson River, and tributaries of the Mahwah River as water bodies of concern due to potential sediment loading. The Minisceongo Creek and Mahwah River ultimately discharge to the Hudson River.

6.1.1 *Minisceongo Creek Sewershed*

The Minisceongo Creek sewershed is approximately 12,000 acres in size. It is bordered to the west by Cranberry Mountain and the Town of Haverstraw to the east. It extends as far north as Pole Brook Mountain and south beyond Happy Valley. Stormwater flow from the sewershed is conveyed via overland flow to the Minisceongo Creek, which discharges to the Hudson River.

6.1.2 *Mahwah River Sewershed*

The Mahwah River sewershed is located to the west of Calls Hollow Road, and south of Second Reservoir. It is approximately 16,000 acres and encompasses a majority of the Ramapo Mountains. Stormwater discharged from this sewershed travel northeast via overland flow to local tributaries which ultimately discharge to the Mahwah River.

6.2 Pollutants of Concern (POCs)

The Town has identified the following as POCs. Per MS4 General Permit requirements, the POCs of primary concern are floatables, silt/sediment, nitrogen, phosphorus, pathogens, and flows that come into contact with stormwater discharged to 303-D listed waterbodies (there are no 303-D listed waterbodies in the Town).

- Floatables and trash accumulation in the storm sewer system and waterbodies.
- Silt/Sediment - The USEPA lists sediment as the most common pollutant in waterbodies. Sediment contains loose sand, clay, and silt that can clog fish gills, erodes stream banks and lead to excess sedimentation buildup in reservoirs and waterways. Sediment runoff is high in nutrient content, particularly nitrogen and phosphorus. Excess nutrients from sediment runoff can greatly impact the quality and economic value of the receiving waterbodies and watersheds.
- Nitrogen and phosphorus are nutrients that can cause the overgrowth of algae in waterbodies. Yard wastes (leaves and grass clippings), pet wastes, fertilizers, detergents, and runoff from improper erosion controls carried through stormwater are all identified as POCs.
- Septic and pathogens from improperly maintained systems, or illicit connections to the storm drain.
- Pollutants from illicit dumping/discharging to storm drains.
- Pollutants from municipal operations (soap, oil/grease, sediment, fertilizer, petroleum, hydrocarbons, heavy metals, polycyclic aromatic hydrocarbons (PAHs), etc.).

6.3 Geographic Areas of Concern

The following geographic areas within the Town have been identified as Areas of Concern for the following reasons:

- The main corridors/business areas within the Town due to trash and sediment accumulation.
- Local parks due to trash accumulation and the necessity for proper sediment controls and proper fertilizer storage/use.
- The areas of lowest topography in Town, including the eastern side of the Town closest to the Hudson River, as they are more susceptible to sediment buildup in catch basins.
- Construction sites due to the necessity for proper sediment and erosion controls.

6.4 Reduction of POCs

Conditions specific to the Town have been evaluated to determine the measurable goals for meeting the requirements of the MS4 program, outlined within this Plan.

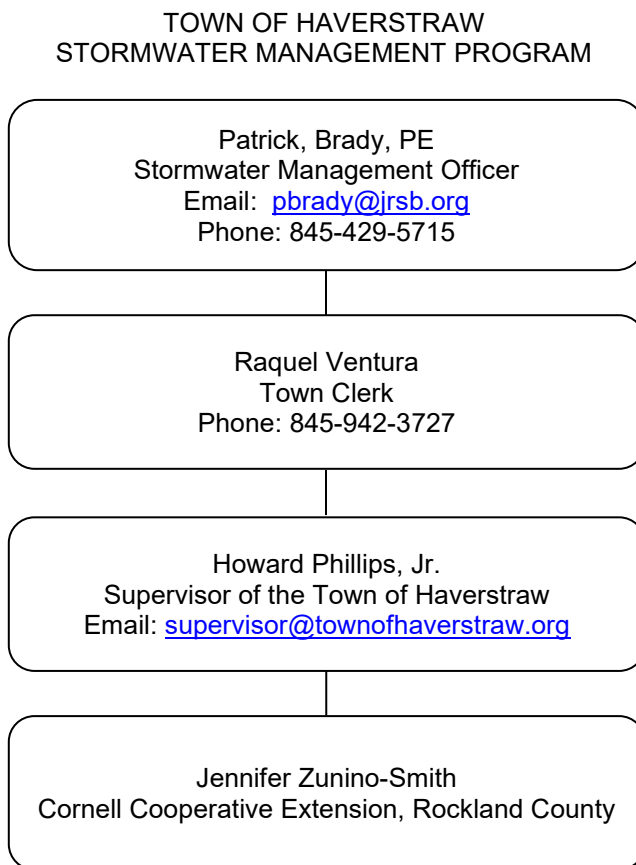
1. Identification of Target Audiences - Homeowners, students, businesses, commercial facilities, contractors, certain municipal employees, and the public are considered target audiences. The Town will continue to contract with CCE to expand outreach, education, volunteer opportunities and more on stormwater pollution and POCs to target audiences.
2. Outreach, Education, and Volunteer Opportunities to Target Audiences - The Town remains an active member of the Stormwater Consortium of Rockland County and therefore maintains a partnership with CCE. Extensive education on the POCs identified in this Plan, as well as volunteer opportunities, interactive maps, public service announcements, brochures, and more are available from CCE's website at <http://rocklandcce.org/stormwater-consortium-water-quality-education>. The Town webpage provides a link connecting directly to CCE's Stormwater and Water Quality Education webpage, which can be accessed here: <https://www.townofhaverstraw.org/stormwater.html>. The "Cornell Cooperative Extension Stormwater Consortium & Water Quality Education Web Link" tab can be used to access CCE's Stormwater and Water Quality Education webpage.
3. Additional Town Efforts - In addition to the efforts outlined under each Minimum Control Measures section (below), the Town will continue to partner with CCE for education and training, and implement independent efforts such as street sweeping, catch basin cleanings (heightened in geographic areas of concern), pre-construction meetings, construction oversight, and utilization of local laws to reduce silt/sand/sediment, nutrients, and illicit discharge POCs in the MS4 to the MEP.

7.0 ALTERNATIVE IMPLEMENTATION OPTIONS

The Town continues to work with the Stormwater Consortium of Rockland County to assist in portions of SWMP development, implementation, or enforcement. The requirements for this part of the MS4 General Permit will be followed when entering into yearly or future agreements.

8.0 STAFFING PLAN/ORGANIZATIONAL CHART

A written staffing plan/organizational chart has been developed which includes job titles and other entities as identified in Part IV.A.1, and the roles and responsibilities for each corresponding to the required elements of the SWMP. Information will be communicated and coordinated among these different entities at routine meetings and information sessions that are facilitated by the CCE of Rockland County Stormwater Consortium.



9.0 AVAILABILITY OF SWMP

The current SWMP and documentation associated with the implementation of the SWMP will be available during normal business hours to the management and staff responsible for implementation as well as the NYSDEC and USEPA staff. The current SWMP is available for public inspection during normal business hours at Town Hall, located at 1 Rosman Road, Garnerville, NY 10923 and is also posted on the Town's website. The previous SWMP is available for public inspection during normal business hours at Town Hall.

10.0 MAPPING

The Town will continue to develop and maintain comprehensive system mapping to include the mapping components as outlined in the MS4 General Permit. The comprehensive system mapping is kept online at

www.arcgisonline.com and will be in a readily accessible format, with scale and detail appropriate to provide a clear understanding of the MS4, to serve as a planning tool to allow for prioritization of efforts and facilitate management decisions. Annually, after Phase I (Part IV.D.2.a.) completion, the comprehensive system mapping will be updated to include updates to prioritization information of monitoring locations (Part VI.C.1.d.), construction sites (Part VI.D.5.), and municipal facilities (Part VI.F.2.c.i).

Per the previous MS4 General Permit, the comprehensive system mapping includes the following (refer to the [CCE Rockland's Stormwater Consortium Interactive Map](#) for most layers and the Stormwater Consortium of Rockland County's [unified stormwater mapping database](#) for each municipality's mapping).

- a. MS4 outfalls. Maintained on the SCRC's unified database.
- b. Interconnections Log. Maintained on the SCRC's unified database.
- c. Preliminary storm-sewershed boundaries. Per answer #391 on the [NYSDEC's Responsive Summary](#), Watershed delineations can serve as boundaries. The HUC 12 Watershed delineations are available on the [Hudson Valley Resource Mapper](#) and [CCE Rockland's Stormwater Consortium Interactive Map](#).
- d. MS4 General Permit Part IV.C.D.1.d is not Applicable to towns and Towns within Rockland County
- e. Basemap information:
 - 1) Automatically and additionally designated areas. This layer can be found on the [NYSDEC Info Locator](#).
 - 2) Names and location of all surface waters of the State, including:
 - a) Waterbody classification. This information is available on the [Hudson Valley Resource Mapper](#) and [CCE Rockland's Stormwater Consortium Interactive Map](#).
 - b) Waterbody Inventory/Priority Waterbodies List (WI/PWL).
 - Impairment status. This information is available on the [Hudson Valley Resource Mapper](#) and [CCE Rockland's Stormwater Consortium Interactive Map](#).
 - POC, if applicable; refer to [CCE Rockland's Stormwater Consortium Interactive Map](#) for the most recent 303-D Listed Impaired waters.
 - c) TMDL watershed areas. TMDLs are not applicable to Rockland County.
 - 3) Land use, including:
 - a) Industrial
 - b) Residential
 - c) Commercial
 - d) Open space
 - e) Institutional
 - 4) Roads
 - 5) Topography

This information is available for Rockland County on [CCE Rockland's Stormwater Consortium Interactive Map](#).

11.0 LEGAL AUTHORITY

As required by the conditions of the MS4 General Permit, the Town has enacted and adopted local laws regarding Stormwater Management which can be found within the [Town of Haverstraw Local Legislation](#). The laws include “Illicit Discharges, Activities and Connections to Storm Sewer System” (Part III, Chapter 137, Article XV) and “Stormwater Management and Sediment and Erosion Control” (Part III, Chapter 137, Article XVI). Both laws have been certified to be equivalent to the State Model Law. Both laws have been certified to be equivalent to the State Model Law (refer to Appendix K).

12.0 ENFORCEMENT RESPONSE PLANS

The Town has developed and will implement the following Enforcement Response Plans (ERPs) which clearly describe the actions to be taken for violations of illicit discharge, construction, and post-construction laws. The ERPs set forth a protocol to address repeat and continuing violations through progressively stricter responses (i.e., escalation of enforcement) as needed to achieve compliance with the terms of the MS4 General Permit. ERPs and enforcement tracking procedures are incorporated into the following documents:

- Enforcement Response Plan (IDDE)
- Enforcement Response Plan (Construction), Construction Inspection Form
- Enforcement Response Plan (Post-Construction)

Refer to Appendix A to review the ERPs listed above.

13.0 MINIMUM CONTROL MEASURE I: PUBLIC EDUCATION AND OUTREACH PROGRAM

The Stormwater Consortium of Rockland County is managed through CCE, who employs an educator to provide education and outreach resources and opportunities related to stormwater pollution and prevention (see CCE’s Annual Deliverable). CCE’s Stormwater and Water Quality webpage, which provides extensive education about identified POCs, is available at this location: <http://rocklandcce.org/stormwater-consortium-water-quality-education>. The webpage includes interactive maps, training, information on nutrient pollution, water-wise landscaping, green infrastructure, monthly workshops on the Rockland County Fertilizer Law Act, and more.

13.1 Implementation and Frequency

To implement public education, the Town prints and delivers stormwater brochures targeted towards residents, commercial businesses, institutions, and private contractors (there are no industries in the incorporated Town). The brochures are available on CCE’s webpage (<http://rocklandcce.org/fact-sheets>). The Town webpage provides a link connecting directly to CCE’s Stormwater and Water Quality Education webpage. CCE’s monthly stormwater newsletter content is also available for the municipality’s newsletter use. The Town continues to broaden its target audience with assistance from the CCE.

Through the Environmental Educators of Rockland County, the public can also participate in a variety of environmental, water quality, and stormwater education programs. The programs appeal to a diverse range of audiences. The following educational opportunities are examples of what is offered:

- Keep Rockland Beautiful - Spring and Fall litter cleanups are organized each year throughout Rockland County. Stormwater and environmental education information is provided during these cleanup events. <https://keeprocklandbeautiful.org/environmental-education-partners/>
- Rockland County Department of Environmental Resources (DER) - The DER manages NYSDEC's Water Assessments by Volunteer Evaluators (WAVE) program, storm drain markings, culvert assessments, and more throughout Rockland County. <https://www.rocklandcountyny.gov/departments/environmental-resources/volunteer-opportunities>
- Lamont-Doherty Earth Observatory, Columbia University - School programs are offered which provide community science lessons and environmental education to the public. <https://blog.ideo.columbia.edu/piermont/community-science-2/>
- Rockland Planning Land Use with Students - Each year, students from around Rockland County choose a site slated for development within the County and present on sustainable measures and green infrastructure that could be implemented at the site. <https://www.ideo.columbia.edu/edu/plus/index.html>
- Sparkill Creek Watershed Alliance - A community action group promoting environmental awareness, partnerships, and practices that restore and preserve the health of the Sparkill Creek. <http://www.sparkillcreek.org/>
- Strawtown Studio - The Strawtown Studio enables Rockland County community members to connect with nature through art and science. The studio promotes community water advocacy, citizen science projects, and aquatic monitoring projects. <https://strawtownstudio.org/environmental-stewardship>

14.0 MINIMUM CONTROL MEASURE II: PUBLIC INVOLVEMENT/PARTICIPATION

Annually, drafts of the SWMP and MS4 Annual Report are presented at a meeting that takes place at the Town Hall. The public is informed of their opportunity to participate in the development of both documents via notices that are sent to the public prior to the meetings in the form of meeting agendas. Copies of these public notices are included with this SWMP (refer to Appendix J). At the meetings, the public is encouraged to review and make comments on the SWMP and Annual Report drafts. A summary of public comments made at the meetings is included with this SWMP and the SWMP is updated within 30 days of receiving the comments.

The public may call the Town of Haverstraw Highway Department at 845-429-9126 with concerns regarding stormwater management and compliance with MS4 General Permit requirements.

15.0 MINIMUM CONTROL MEASURE III: ILLICIT DISCHARGE DETECTION AND ELIMINATION

Illicit Discharge Detection and Elimination (IDDE) plays a significant role in improving water quality. Illicit discharges are discharges entering the MS4 that are not entirely composed of stormwater. Since MS4s usually drain to untreated stormwater to waterbodies, pollutants generated by the following activities are contributors to water quality degradation: trash, debris, and other materials improperly disposed into the drainage system, incorrectly plumbed sanitary sewer connections to storm sewer infrastructure, septic tank seepage, pesticides, fertilizers, and other lawn care maintenance products, and more.

15.1 Illicit Discharge Detection

As soon as any person has information of any known or suspected release of materials that may result in illegal discharges or pollutants discharging into the MS4, they should take all necessary steps to ensure the discovery, containment, and cleanup of the release. If hazardous materials are released, they should immediately notify emergency response agencies, the Town, and the responsible MS4 of the occurrence via emergency dispatch services. If non-hazardous materials are released, they should notify the Town and the responsible MS4 in person or by telephone no later than the next business day. Notifications in person or by telephone should be confirmed by written notice addressed and mailed to the Town within three business days of the telephone notice. If the discharge of prohibited materials emanates from a commercial or industrial establishment, the owner/operator should also retain an onsite written record of the discharge and the actions taken to prevent its recurrence. Such records shall be retained for at least three years and will be included in the MS4 Annual Report.

15.2 Illicit Discharge Track Down/Elimination Program

If an illicit discharge is reported, the Highway Department will inspect and assess the discharge, along with any other relevant department(s), to eradicate discharge. The illicit discharge will be tracked down utilizing the Town's internal resources. Relevant departments will work together to pursue any further action needed to identify and eradicate the cause using established means (Notice of Violation, court appearances, administrative fines, etc.). Refer to Appendix B for an example letter that may be administered to an owner/operator contributing an illicit discharge to the Town's MS4.

Illicit discharges will be documented using the methods identified in the ERP and include the date, location, type, follow-up actions taken or needed, inspection outcomes and enforcement taken within 30 days of verification of an illicit discharge. The IDDE ERP will be kept on file at Town Hall and is included with this SWMP (Appendix A).

15.3 Public Education/Prevention of Illicit Discharges

The Stormwater Consortium of Rockland County has created an Illicit Discharge flyer with information related to the prevention of illicit discharges. The flyer is available on their [Fact Sheet](https://rocklandcce.org/fact-sheets) page (<https://rocklandcce.org/fact-sheets>) and includes the following as required:

- Types of allowable discharges (Part I.A.3).
- What is an illicit discharge and why is it prohibited (Part VI.C).
- The environmental hazards associated with illicit discharges and improper disposal of waste.
- Proper handling and disposal practices for the most common illicit discharge generating behaviors within the community (e.g., septic care, car washing, household hazardous waste, swimming pool draining, or other activities resulting in illicit discharges to the MS4).
- How to report illicit discharges (Part VI.C.1.a).

16.0 MINIMUM CONTROL MEASURE IV: CONSTRUCTION SITE STORMWATER RUNOFF CONTROL

16.1 Applicable Construction Activities/Projects/Sites

Construction activities require stormwater runoff control when the project results in a total land disturbance of greater than or equal to one acre. This includes projects where land disturbance is less than one acre but is cumulatively part of a larger common plan of development or sale that will disturb greater than or equal to one acre.

16.2 Public Reporting of Construction Site Complaints

The public may call the Town of Haverstraw Highway Department at 845-429-9126 to report complaints related to construction stormwater runoff activity. Construction site complaints will be documented using the ERP to include date, location, nature, follow-up actions taken or needed, and inspection outcomes and enforcement taken. The Construction ERP will be kept on file at Town Hall and is included with this SWMP (Appendix A).

16.3 Construction Oversight Program

The oversight of construction activity plays a significant role in protecting water quality, since construction activities have the capability to generate sediment through erosion of exposed land surfaces. Relatedly, sediment is listed under the Pollutants of Concern section of this SWMP (see above). Excess nutrients from sediment runoff can also greatly impact the quality and economic value of the receiving waterbodies and watersheds. The Town has implemented a construction oversight program to mitigate the impacts of sediment runoff during construction activities that includes the following elements:

- Stormwater Pollution Prevention Plan (SWPPP) Development - Prior to any approved land development/construction activity taking place in the Town, the Town Planning Board or the building inspector must receive a SWPPP. The Town of Haverstraw Legislation document Part XVI, Chapter 137, Article III, Sections 85 and 86 outline the requirements of the SWPPP.
- Performance and Design Criteria - All land development activities are subject to specific stormwater management practices and design criteria that are outlined in Section 137-90 of the Town Legislation document.
- Maintenance, Inspection, and Repair of Stormwater Facilities During Construction - Stormwater maintenance activities are to be implemented during and after construction, and routine inspections

of stormwater facilities must take place to verify that they are in good repair and function properly. Specific details regarding the maintenance, inspection, and repair of stormwater facilities are outlined in Section 137-91 of the Town Legislation document.

- Stormwater Management Practice Inspections - The Stormwater Management Officer is responsible for conducting erosion and sediment control inspections, as well as inspections of SMPs. All applicants are required to submit as-built plans for any stormwater management practices located onsite after final construction is completed. The plans should show the final design specifications for all stormwater management facilities and shall be certified by a professional engineer. Specific details regarding these erosion and sediment control inspections are outlined in Sections 137-95.A and 137-95.B of the Town Legislation document.
- Inspection of Stormwater Facilities After Project Completion - Subject to approval of the Stormwater Management Officer, inspection programs must include routing inspections, random inspections, inspections based upon complaints or other notice of possible violations, inspection of drainage basins or areas identified as higher-than-typical sources of sediment or other contaminants or pollutants, inspections of businesses or industries of a type associated with higher-than-usual discharges of contaminants or pollutants or with discharges of a type which are more likely than the typical discharge to cause violations of state or federal water or sediment quality standards or the MS4 General Permit, and joint inspections with other agencies inspecting under environmental or safety laws. Inspections may include, but are not limited to, reviewing maintenance and repair records, sampling discharges, surface water, groundwater, and material or water in drainage control facilities, and evaluating the condition of drainage control facilities and other stormwater management practices. Specific details about these types of inspections are outlined in Section 137-95.C of the Town Legislation document.

16.4 MS4 Operator Training

MS4 operators at the Town of Haverstraw are trained in construction oversight procedures in accordance with the MS4 General Permit Part VI.D.3. Each year, MS4 operators review and update, if necessary, the oversight procedures. The Electronic Signature List (Appendix C) is signed by those who took the training initially, as well as those who review the construction oversight procedures annually by April 1.

16.5 Construction Site Inventory and Inspection Tracking

The inventory of applicable construction sites can be accessed at [NYSDEC Construction Database](#). The database is also utilized to track the status of Notice of Terminations. The database is periodically updated with assistance from the Stormwater Consortium of Rockland County. The Town's mapped construction site inventory, categorized by status (Under Construction, Construction Complete with an SMP, Never Constructed, etc.), can be accessed through the MS4 ArcGIS Online account at www.arcgisonline.com.

16.6 Construction Site Prioritization

Sites are prioritized as either a high or low priority for inspection based on factors outlined in the MS4 General Permit Part VI.D.5.

16.7 SWPPP Review

If an owner/operator has submitted a SWPPP to the Town for review, the SWPPP is reviewed at the pre-construction meeting. The SWPPP review program components are outlined in the “SWPPP Checklist” document developed by the Stormwater Consortium of Rockland County (refer to Appendix D). Once the checklist is completed, a copy is kept with this SWMP. Only individuals who have received the required 4-hour training¹ are allowed to review SWPPP documents (these individuals are tracked on the Electronic Signature List, refer to Appendix C).

16.8 Pre-Construction Meeting

The Town holds a pre-construction meeting prior to the commencement of construction activities. The components of the pre-construction meeting are outlined in the “Pre-Construction Meeting Checklist” document developed by the Stormwater Consortium of Rockland County (Appendix E). Once the checklist is completed, a copy is kept with this SWMP.

16.9 Constructon Site Inspections

Construction site inspections take place in accordance with the Town of Haverstraw Legislation document Part III, Chapter 137, Article XVI, Section 95. The components of construction site inspections are outlined in the “Active Construction Site Inspection, Post-Construction SMP Inspection, and Construction Site Closeout Checklist” document developed by the Stormwater Consortium of Rockland County (refer to Appendix F). Only individuals who have received the required 4-hour training are allowed to conduct MS4 construction site inspections (these individuals are tracked on the Electronic Signature List, refer Appendix C).

If erosion and sediment controls at a construction site are determined to be inadequate at the time of an inspection, the Town may issue a “Stop Work Order/Notice of Violation” letter. This letter describes the issue that was observed (e.g., turbid water was observed to be entering the Town’s storm drain) and the local law that the observation violates. An example “Stop Work Order/Notice of Violation” letter is included as Appendix G.

16.10 Constructon Site Closeout

The components of construction closeouts are outlined in the “Active Construction Site Inspection, Post-Construction SMP Inspection, and Construction Site Closeout Checklist” document developed by the Stormwater Consortium of Rockland County (refer to Appendix F).

¹ Four hours of Department-endorsed training in proper Erosion and Sediment Control principles from a Soil and Water Conservation District, or other Department-endorsed entity. Training must be completed within three years of the EDC (January 2025) and every three years thereafter. Individuals who meet the definition of a qualified professional or qualified inspector are exempt from this requirement.

17.0 MINIMUM CONTROL MEASURE V: POST-CONSTRUCTION STORMWATER MANAGEMENT

The Town has a local law for maintenance of permanently installed SMPs post-construction under [Chapter 137, Stormwater Management, Article XVI, Stormwater Management and Erosion and Sediment Control, §137-95, Adopted by the Town of Haverstraw Town Board 1-25-2010 by L.L. No. 1-2010](#). Additionally, the ERPs (Appendix A) provide a protocol to address repeat and continuing violations related to maintenance deficiencies through progressively stricter responses. Inspection letters to the SMP owner/operator are sent in accordance with timeframes identified on the post-construction SMPs inventory, after which follow-up actions are considered.

17.1 Applicable Post-Construction SMPs

This requirement applies to post-construction SMPs that have been installed as part of any CGP covered construction site or individual SPDES permit (since March 10, 2003). A list of post-construction SMPs are maintained on the Stormwater Consortium of Rockland County's database, which can be accessed online.

17.2 Post-Construction Smp Inventory and Inspection Tracking

The Town adds SMPs to the post-construction inventory as they are approved or identified, or after the owner/operator of the construction activity has filed a Notice of Termination form with the Department (Part VI.D.9.b.). If the Town has not received a Notice of Termination on file, a request will be sent. An example Notice of Termination letter is included as Appendix H. Notice of Terminations are tracked on the [NYSDEC NOI Database](#). The Stormwater Consortium of Rockland County works to collaboratively update the post-construction inventory with the Town annually.

17.3 SWPPP Review

Refer to the MCM IV, SWPPP Review section above.

17.4 Post-Construction SMP Inspection and Maintenance Program

The post-construction SMP inspection and maintenance program is included in the "Active Construction Site Inspection, Post-Construction SMP Inspection, and Construction Site Closeout Checklist" document developed by the Stormwater Consortium of Rockland County (Appendix F).

17.4.1 Post-Construction SMP Letter

As a component of the post-construction SMP inspection and maintenance program, the Town sends a letter to the owner/operator of qualifying construction sites (see MS4 General Permit Part VI.E.1 for qualifications) regarding follow up SMP inspections that must be completed by the owner/operator following construction. The owner/operator is required to send inspection reports to the Town at a frequency defined

in their SWPPP. Refer to Appendix I for an example of the Town's "Post-Construction SMP Inspection Report" letter.

17.4.2 MS4 Operator Training

MS4 operators at the Town are trained in MS4 post-construction SMP inspection/maintenance procedures in accordance with the MS4 General Permit Part VI.E.4.b. Each year, MS4 operators review and update the SMP inspection/maintenance procedures. The Electronic Signature List (Appendix C) is signed by those who took the training initially, as well as those who review the SMP inspection/maintenance procedures annually by April 1.

The [NYSDEC MS4 General Permit Fact Sheet](#) indicates that, for practices where an associated SWPPP is not on file, MS4 operators must follow the frequencies outlined in the NYSDEC 2017 Maintenance Guidance. This change was made in response to public feedback received during the draft GP-0-17-002 public comment period, and the MS4 Stakeholder Workgroup, which expressed the concern that older practices installed prior to the adoption of the local law for erosion and sediment control often contain limited information on file, including the original project SWPPP. Using the NYSDEC 2017 Maintenance Guidance to complete inspections satisfies the Phase II Remand Rule and allows the MS4 operators to reduce the discharge of pollutants to the maximum extent possible.

18.0 MINIMUM CONTROL MEASURE VI: POLLUTION PREVENTION AND GOOD HOUSEKEEPING

The discharge of Pollutants of Concern to the Town/Town MS4 system must be reduced to the maximum extent practicable from municipal operations. Pollutant generating activities may include, but are not limited to, street and bridge maintenance, winter road maintenance, stormwater system maintenance, vehicle and fleet maintenance, park and open space maintenance, municipal building maintenance, solid waste management, new construction and land disturbances, right-of-way maintenance, marine operations, hydrologic habitat modification, or other.

18.1 Best Management Practices (BMPs) for Municipal Facilities and Operations

The MS4 General Permit specifies that BMPs for Municipal Facilities and Operations must be incorporated into their Municipal Facility Program within three years of the EDC, which is January 2028. The Town is working to identify and/or create required BMPs and incorporate them into the Municipal Facility Program by that deadline. Municipal wash waters are currently discharged to an area where they are collected to be recycled or discharged to the sanitary sewer in accordance with MS4 General Permit Part VI.F.1.

18.2 Municipal Facilities

The MS4 General Permit specifies that a Municipal Facility Program (and its associated components) must be developed and implemented within three years of the EDC, which is January 2028. The Town is in the process of developing the required components of the Municipal Facility Program to meet the deadline.

18.3 Municipal Operations and Maintenance

The MS4 General Permit specifies that a Municipal Operations Program (and its associated components) must be developed and implemented within three years of the EDC, which would be by January 2028. The Town is in the process of developing the required components of the Municipal Facility Program to meet the deadline.

18.4 Roads, Bridges, Parking Lots, and Right-of-Way Maintenance

The Town has developed and implemented procedures for sweeping and/or cleaning municipal streets, bridges, parking lots, and right-of-ways that are owned/operated:

- All roads, bridges, parking lots, and right-of-ways are swept and/or cleaned once every five years in the Spring (following Winter activities such as sanding).
- Each year, from April 1 to October 31, roads in business and commercial areas are swept.

19.0 CONCLUSION

The measures outlined in this report demonstrate the Town's commitment to protecting water quality. Moreover, this report serves as a guide for long-term compliance and effective stormwater management. The Town will maintain this SWMP on-file and update accordingly, as required by the terms and conditions of the MS4 General Permit.

APPENDIX A

Enforcement Response Plans (ERPs)

- **Illicit Discharge Detection and Elimination**
- **Construction**
- **Post-Construction**

Enforcement Response Plan: Illicit Discharge Detection and Elimination

NYSDEC GP-0-24-001
Effective Date: July 6, 2024


INSTRUCTIONS FOR USE

Part IV.F of the permit covers Enforcement Measures & Tracking:

- The MS4 Operator must develop and implement an Enforcement Response Plan (ERP) clearly outlining actions to be taken for illicit discharge violations.
- The ERP must set forth a protocol to address **repeat and continuing violations** through progressively stricter responses (i.e., escalation of enforcement) as needed to achieve compliance with the terms and conditions of this *SPDES* general permit.
- Instances of non-compliance must be documented in the SWMP Plan. This can be by reference (“refer to inspection reports on-file at building department”).

Part VI of the permit covers the Illicit Discharge Track Down Program and the Illicit Discharge Elimination Program:

- Each program has **timeframe** requirements for Track down and Elimination.
- Each program has **training** requirements for those doing inspections.

Enforcement Response Plan Illicit Discharge Detection and Elimination NYSDEC GP-0-24-001 Effective Date: July 6, 2024		MS4: Town of Haverstraw Report illicit discharges to Town of Haverstraw Highway Department at (845) 429-9126
Legal Authority: Local Law Part III, Chapter 137, Article XV- <i>Illicit Discharges, Activities, and Connections to Storm Sewer System</i> adopted by the Town Board on May 22, 2006 , by L.L. No. 4-2006 is hereby equivalent to the NYS Model IDDE Law (https://ecode360.com/11794289).		

PURPOSE: PART IV.F.1: Enforcement Response Plan (p. 14)

The MS4 Operator must develop and implement an enforcement response plan (ERP) describing action(s) to be taken for violations enacted for **illicit discharge** (Part VI.C). The ERP must set forth a protocol to address **repeat and continuing violations** through **progressively stricter responses** (i.e., escalation of enforcement) as needed to achieve compliance with the terms and conditions of the MS4 permit. The purpose of this document is to provide guidance on how the MS4 Operator will use the types of enforcement responses or combination of responses. The Stormwater Program Coordinators are listed in the SWMP document.

The ERP must describe how the *MS4 Operator* will use the following types of enforcement responses or combination of responses:

Verbal warnings* (see below)	The Town will pursue compliance with storm water violations through verbal methods (telephone notifications, verbal notices, meetings) whenever reasonable. These methods are appropriate for situations where education is needed, violations do not pose a significant impact to human health or the environment, or the Town believes that compliance can be achieved without the use of formal measures.
Written notices* (see below)	When the municipality's Stormwater Management Coordinator (SMO) finds that a person has violated a prohibition or failed to meet a requirement of Article XV, Illicit Discharges, Activities, and Connections to Storm Sewer System, the SMO may order compliance by written notice of violation by certified mail and/or posting of the property to the responsible person as per §137-72.A of the Local Law.

Appendix A

Citations (and associated fines)	Penalties/fines will be issued for failure to comply with a Written Notice or for extreme violations of the Town's construction site stormwater requirements. Penalties for offences are described in §137-72.B of the Local Law.
Stop work orders	When the Town SMO finds that a discharge has taken place or is likely to take place, a Stop Work order may be issued. The persons not complying shall: a) comply with the SMO requirement, b) comply with a time schedule for compliance, and/or c) take appropriate compliance remedial or preventive action to prevent the violation from recurring.
Withholding plan approvals or other authorizations affecting the ability to <i>discharge</i> to the MS4; and	The Town has the authority to withhold plan approvals and other authorizations affecting the ability to discharge to the MS4 if the above types of enforcement have not resulted in compliance. Regulations with respect to suspension of access to the MS4 are described in §137-101 of the Local Law, Suspension of MS4 Discharge Access.
Additional measures, supported in local legal authorities, such as collecting against the project's bond or directly billing the responsible party to pay for work and materials to correct violations.	Further appropriate actions will be used against a responsible party that fails to comply with previous remedies or to stop discharges, considered to pose an immediate risk to the public or the environment as per §137-72 of the Local Law.
Other	

*Efforts to obtain a voluntary correction of deficiencies through informal enforcement, such as verbal warnings or written notices, must not exceed sixty (60) days in duration (from the time of the MS4 Operator's initial determination until a return to compliance).

PART IV.F.2: Enforcement Tracking (p. 15)

The MS4 Operator must track instances of non-compliance in the SWMP Plan **within 30 DAYS** (note in SWMP where you are keeping ERP reports- "on file electronically at Build Dept"). The enforcement case documentation must include, at a minimum, the following:

Date of report	Click or tap here to enter text.
Name of the owner/operator of the facility or site of the violation (can be redacted from the publicly available SWMP Plan);	Click or tap here to enter text.

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Location of the <i>illicit discharge</i> ;	Click or tap here to enter text.
Description of the violation/Nature of the illicit discharge*	Click or tap here to enter text.
Schedule for returning to compliance;	Click or tap here to enter text.
Description of enforcement response used, including escalated responses if repeat violations occur or violations are not resolved in a timely manner. Follow up actions taken or needed (including response times);	Click or tap here to enter text.
Inspection outcomes and any enforcement taken.	Click or tap here to enter text.
Accompanying documentation of enforcement response (e.g., notices of noncompliance, notices of violations)	Click or tap here to enter text.
Any referrals to different departments or agencies;	Click or tap here to enter text.
Date violation was resolved.	Click or tap here to enter text.
<p>*(P. 36 of Permit): Documentation of all monitoring location (outfall) inspections, including any sampling results, using the Monitoring Locations Inspection and Sampling Field Sheet (Appendix D) or equivalent form. Sampling provisions may apply to suspect or obvious illicit discharges based on the number and severity of physical indicators present in the flow, to better inform track down procedures. If the source of the illicit discharge is clear and discernable (e.g., sewage), sampling is not necessary. Provisions to re-inspect the monitoring location within thirty (30) days if physical indicator is not related to flow or potentially indicative of intermittent or transitory discharges. Initiate track-down if the same indicators persist.</p>	

Part VI.C.2. Illicit Discharge Track Down Program (p. 27)

Within two (2) years of the EDC (January 2026), the MS4 Operator must develop and implement an illicit discharge track down program to identify the source of illicit discharges and the responsible party. The illicit discharge track down program must be documented in the SWMP Plan specifying the illicit discharge track down procedures, including:

Procedures as described in Chapter 13 of CWP 2004 or equivalent;	SEE SWMP
--	----------

<p>Steps taken for illicit discharge track down procedures; <small>Per previous permit written procedure required. Include who's doing inspections, how often, is there a map and if so in what format and where is it kept, etc.</small></p>	<p>Click or tap here to enter text.</p>	
<p>The following timeframes to initiate illicit discharge track down:</p>	<p>Check box(es) of which timeframe(s) applies:</p>	
	<p>Within twenty-four (24) hours of discovery, the MS4 Operator must initiate track down procedures for flowing MS4 monitoring locations with obvious illicit discharges;²²</p>	<p><input type="checkbox"/></p>
	<p>Within two (2) hours of discovery, the MS4 Operator must initiate track down procedures for obvious illicit discharges of sanitary wastewater that would affect bathing areas during bathing season, shell fishing areas or public water intakes and report orally or electronically to the Regional Water Engineer and local health department; and</p>	<p><input type="checkbox"/></p>
	<p>Within five (5) days of discovery, the MS4 Operator must initiate track down procedures for suspect illicit discharges.</p>	<p><input type="checkbox"/></p>

²² Reference to the Monitoring Locations Inspection and Sampling Field Sheet, adapted from CWP 2004, Section 6:

Part VI.C.3. Illicit Discharge Elimination Program (p. 28)

Within two (2) years of the EDC (January 2026), the MS4 Operator must develop and implement an illicit discharge elimination program. The illicit discharge elimination program must be documented in the SWMP Plan specifying:

Provisions for escalating enforcement and tracking	Refer to Enforcement Response Plan	
Provisions to confirm the corrective actions have been taken	Refer to Enforcement Response Plan	
Steps taken for illicit discharge elimination procedures; and	Click or tap here to enter text.	
The following timeframes for illicit discharge elimination:	Check box(es) of which timeframe(s) applies:	
	Within twenty-four (24) hours of identification of an illicit discharge that has a reasonable likelihood of adversely affecting human health or the environment, the MS4 Operator must eliminate the illicit discharge;	<input type="checkbox"/>
	Within five (5) days of identification of an illicit discharge that does not have a reasonable likelihood of adversely affecting human health or the environment, the MS4 Operator must eliminate the illicit discharge; and	<input type="checkbox"/>
	Where elimination of an illicit discharge within the specified timeframes is not possible, the MS4 Operator must notify the NYSDEC Regional Water Engineer.	<input type="checkbox"/>

Training and Procedures: Illicit Discharge Track Down and Elimination Programs
(p. 27-29)

a. The training provisions for the MS4 Operator's illicit discharge track down and elimination procedures:

If new staff are added, training on the MS4 Operator's procedures must be given prior to conducting illicit discharge track down and eliminations;	Click or tap here to enter text.
For existing staff, training on the procedures must be given prior to conducting illicit discharge track down and eliminations and once every five (5) years, thereafter; and	Click or tap here to enter text.
If the procedures are updated, training on the updates must be given to all staff prior to conducting illicit discharge track downs and eliminations.	Click or tap here to enter text.
The name, titles and contact information for those who received illicit discharge track down and elimination procedures must be updated annually.	Click or tap here to enter text.
Annually, by April 1, the <i>MS4 Operator</i> must review and update the illicit discharge track down and elimination procedures in the SWMP.	Click or tap here to enter text.

Enforcement Response Plan: Construction Sites

NYSDEC GP-0-24-001
Effective Date: July 6, 2024

INSTRUCTIONS FOR USE

Document all inspections using the **Construction Site Inspection Report Form**. For sites not in compliance use the Enforcement Response Form.

Part IV.F of the permit covers Enforcement Measures & Tracking:

- The MS4 Operator must develop and implement an Enforcement Response Plan (ERP) clearly outlining actions to be taken for construction violations.
- The ERP must set forth a protocol to address **repeat and continuing violations through progressively stricter responses** (i.e., escalation of enforcement) as needed to achieve compliance with the terms and conditions of this *SPDES* general permit.
- Instances of non-compliance must be documented in the SWMP Plan. This can be by reference (“refer to inspection reports on-file at building department”).

Part VI.D.4 of the permit covers the Construction Site Inventory


- Maintain an inventory of all applicable construction sites
- Prioritize them as High or Low Priority

Part VI.D.8 of the permit covers Construction Site Inspections and Training (Pg 34-35):

- Training required to inspect construction sites
- Required documentation of inspection sites
- Required forms for doing inspections

Part VI.D.9 of the permit covers Construction Site Close-out (Pg 35):

- Final Site Inspection requirements
- Notice of Termination requirement

Enforcement Response Plan Construction Sites NYSDEC GP-0-24-001 Effective Date: July 6, 2024		MS4: Town of Haverstraw Report illicit discharges to Town of Haverstraw Highway Department at (845) 429-9126
Legal Authority: Local Law Part III, Chapter 137, Article XVI- Stormwater Management and Erosion and Sediment Control, adopted by the Town Board on January 25, 2010 by L.L. No. 1-2010 is hereby equivalent to the NYS Model IDDE Law (https://ecode360.com/11794289#14568079).		

PURPOSE: PART IV.F.1: Enforcement Response Plan (pg 14)

The MS4 Operator must develop and implement an enforcement response plan (ERP) describing action(s) to be taken for violations enacted for **construction** (Part VI.D). The ERP must set forth a protocol to address repeat and continuing violations through progressively stricter responses (i.e., escalation of enforcement) as needed to achieve compliance with the terms and conditions of this *SPDES* general permit. **The ERP must be documented in the SWMP Plan.** (note in SWMP where you are keeping ERP reports- "on file electronically at Build Dept").

The ERP must describe how the *MS4 Operator* will use the following types of enforcement responses or combination of responses:

Verbal warnings* (see below)	The Town will pursue compliance with storm water violations through verbal methods (telephone notifications, verbal notices, meetings) whenever reasonable. These methods are appropriate for situations where education is needed, violations do not pose a significant impact to human health or the environment, or the Town believes that compliance can be achieved without the use of formal measures.
Written notices* (see below)	When the municipality's SMO finds that a person has violated a prohibition or failed to meet the requirement of Chapter 137, Article XVI, Erosion and Sediment Control Inspection, the applicant and developer shall be notified in writing of the nature of the violation and the required corrective actions. No

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	further work shall be conducted except for site stabilization until any violations are corrected and all work previously completed has received approval by the Stormwater Management Officer as per §137-95.A.2 of the Local Law.
Citations (and associated fines)	The Town of Haverstraw may penalize owner/operator for violations of Chapter 137 in accordance with §137-97.D of the Local Law.
Stop work orders	The Town of Haverstraw may issue a stop-work order for violations of Chapter 137 in accordance with §137-97.B.
Withholding plan approvals or other authorizations affecting the ability to <i>discharge</i> to the MS4; and	The Town has the Authority to withhold plan approvals and other authorizations affecting the ability to discharge to MS4 if above types of enforcement have not resulted in compliance. Regulations with respect to suspension of access to MS4 are described in §137-101 of the Local Law, Suspension of MS4 discharge access. Certificate of occupancy may be withheld in accordance with §137.97.E.
Additional measures, supported in local legal authorities, such as collecting against the project's bond or directly billing the responsible party to pay for work and materials to correct violations.	Further appropriate actions will be taken against a responsible party that fails to comply with previous remedies or to stop discharges, considered to pose an immediate risk to the public or the environment.
Other	

*Efforts to obtain a voluntary correction of deficiencies through informal enforcement, such as verbal warnings or written notices, must not exceed sixty (60) days in duration (from the *MS4 Operator's* initial determination until a return to compliance).

PART IV.F.2: Enforcement Tracking (pg 15)

The MS4 Operator must track instances of non-compliance in the SWMP Plan **within 30 DAYS** (note in SWMP where you are keeping ERP reports- "on file electronically at Build Dept"). The enforcement case documentation must include, at a minimum, the following:

Date of report	Click or tap here to enter text.
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Name of the owner/operator of the facility or site of the violation (can be redacted from the publicly available SWMP Plan);	Click or tap here to enter text.
Location of the <i>construction site</i> ; Is this a High Priority construction site?	Click or tap here to enter text.
Description of the violation/Nature of the complaint;	Click or tap here to enter text.
Schedule for returning to compliance;	Click or tap here to enter text.
Description of enforcement response used, including escalated responses if repeat violations occur or violations are not resolved in a timely manner. Follow up actions taken or needed (including response times);	Click or tap here to enter text.
Inspection outcomes and any enforcement taken;	Click or tap here to enter text.
Accompanying documentation of enforcement response (e.g., notices of noncompliance, notices of violations)	Click or tap here to enter text.
Any referrals to different departments or agencies;	Click or tap here to enter text.
Date violation was resolved.	Click or tap here to enter text.

The MS4 Operator will utilize the Construction Inspection Form provided in Appendix D of the MS4 General Permit (GP-0-24-001) for construction site inspections and include the form with this report.

Part VI.D.8: Construction Site Inspections & Training (Pg 34-35)

The MS4 Operator must:

a. Ensure individuals(s) receive, prior to conducting inspections*:	<input type="checkbox"/> Click or tap here to enter text.
i. Four (4) hours of <i>Department</i> endorsed training in proper erosion and sediment control principles from a Soil & Water Conservation District, or	<input type="checkbox"/> Click or tap here to enter text.

	other <i>Department</i> endorsed entity. This training must be complete, within three (3) years of the EDC (January 2024) and every three (3) years thereafter.*	
	ii. In the <i>SWMP Plan</i> , document and update annually the names, titles, and contact information for the individuals who have received the trainings listed above.	<input type="checkbox"/> Click or tap here to enter text.
	b. Annually inspect all sites with <i>construction activity</i> identified in the inventory (Part VI.D.4.) during active construction after the pre-construction meeting (Part VI.D.7.), or sooner if deficiencies are noted that require attention.	<input type="checkbox"/> Click or tap here to enter text.
	i. Follow up to construction site inspections must confirm corrective actions are completed within timeframes established by the CGP and the <i>MS4 Operator's</i> Enforcement Response Plan (Part IV.F.1.).	<input type="checkbox"/> Click or tap here to enter text.
	c. Document all inspections using the Construction Site Inspection Report Form (Appendix D) or an equivalent form containing the same information. The <i>MS4 Operator</i> must include the completed Construction Site Inspection Reports in the <i>SWMP Plan</i> .	<input type="checkbox"/> Click or tap here to enter text.

Part VI.D.9: Construction Site Close-out (Pg 35)

The <i>MS4 Operator</i> must ensure a final construction site inspection is conducted and documentation of the final construction site inspection must be maintained in the <i>SWMP Plan</i> .	<input type="checkbox"/> Click or tap here to enter text.
--	--

* Individuals without these trainings cannot inspect construction sites. Individuals who meet the definition of a qualified professional or qualified inspector are exempt from this requirement.

<p>The final construction site inspection must be documented using the Construction Site Inspection Report Form (Appendix D), or an equivalent form containing the same information, or accept the construction site owner/operator's <i>qualified inspector</i> final inspection certification required by the CGP.</p>	<div data-bbox="1096 287 1131 323"><input type="checkbox"/></div> <div data-bbox="943 323 1289 352">Click or tap here to enter text.</div>
<p>The Notice of Termination (NOT) must be signed by the MS4 Operator as required by the CGP for projects determined to be complete, in accordance with Part X.J (pg 123).</p>	<div data-bbox="1096 617 1131 653"><input type="checkbox"/></div> <div data-bbox="943 653 1289 682">Click or tap here to enter text.</div>

Enforcement Response Plan: Post-Construction Stormwater Management Practices (SMPs)

NYSDEC GP-0-24-001
Effective Date: July 6, 2024

INSTRUCTIONS FOR USE

Part IV.F of the permit covers Enforcement Measures & Tracking:


- The MS4 Operator must develop and implement an Enforcement Response Plan (ERP) clearly outlining actions to be taken for post-construction violations.
- The ERP must set forth a protocol to address repeat and continuing violations through progressively stricter responses (i.e., escalation of enforcement) as needed to achieve compliance with the terms and conditions of this *SPDES* general permit.
- Instances of non-compliance must be documented in the SWMP Plan. This can be by reference (“refer to inspection reports on-file at building department”).

Part VI.E.2 covers Post-Construction SMP Inventory & Inspection Tracking:

- Maintain an inventory of SMPs installed after 2003. See Stormwater Consortium of Rockland County’s inventory.

Part VI.E.4 covers the Post-Construction SMP Inspection & Maintenance Program (p. 37 and 38):

- By January 2025 the MS4 Operator must develop and implement a post-construction SMP inspection and maintenance program.
 - Ensure that each Post-Construction SMP identified in the inventory is inspected at the frequency described in the NYSDEC Stormwater Maintenance Guidance (annually, 5-year, etc). Frequency of inspection (previous permit requirement) is on the Inventory.
 - Document post-construction SMP inspections using the Post- Construction [SMP Inspection Checklist](#) or an equivalent form containing the same information.
 - The MS4 Operator can only accept **Level 1 inspections** on the SMP Inspection Checklist **by private owners** inspecting post- construction SMPs. Inform them when requesting an inspection report.
 - Maintain all inspection records in the SWMP Plan.

<p>Enforcement Response Plan Post-Construction Stormwater Management Practices (SMPs) NYSDEC GP-0-24-001 Effective Date: July 6, 2024</p>		<p>MS4: Town of Haverstraw</p> <p>Report illicit discharges to Town of Haverstraw Highway Department at (845) 429-9126</p>
<p>Legal Authority: Local Law Part III, Chapter 137, Article XVI- Stormwater Management and Erosion and Sediment Control, adopted by the Town Board on January 25, 2010 by L.L. No. 1-2010 is hereby equivalent to the NYS Model IDDE Law (https://ecode360.com/11794289#14568079).</p>		

PURPOSE: PART IV.F.1: Enforcement Response Plan (p. 14)

The MS4 Operator must develop and implement an enforcement response plan (ERP) describing action(s) to be taken for violations enacted for **construction** (Part VI.D). The ERP must set forth a protocol to address repeat and continuing violations through progressively stricter responses (i.e., escalation of enforcement) as needed to achieve compliance with the terms and conditions of this *SPDES* general permit. **The ERP must be documented in the SWMP Plan.** (note in SWMP where you are keeping ERP reports- “on file electronically at Build Dept”).

The ERP must describe how the *MS4 Operator* will use the following types of enforcement responses or combination of responses:

Verbal warnings* (see below)	The Town will pursue compliance with storm water violations through verbal methods (telephone notifications, verbal notices, meetings) whenever reasonable. These methods are appropriate for situations where education is needed, violations do not pose a significant impact to human health or the environment, or the Town believes that compliance can be achieved without the use of formal measures.
Written notices* (see below)	When the municipality's SMO finds that a person has violated a prohibition or failed to meet the requirement of Chapter 137, Article XVI, Erosion and Sediment Control Inspection, the applicant and developer shall be notified in writing of the nature of the violation

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	and the required corrective actions. No further work shall be conducted except for site stabilization until any violations are corrected and all work previously completed has received approval by the Stormwater Management Officer as per §137-95.A.2 of the Local Law.
Citations (and associated fines)	The Town of Haverstraw may penalize owner/operator for violations of Chapter 137 in accordance with §137-97.D of the Local Law.
Stop work orders	Not applicable for post-construction.
Withholding plan approvals or other authorizations affecting the ability to <i>discharge</i> to the MS4; and	Not applicable for post-construction.
Additional measures, supported in local legal authorities, such as collecting against the project's bond or directly billing the responsible party to pay for work and materials to correct violations.	Further appropriate actions will be taken against a responsible party that fails to comply with previous remedies or to stop discharges, considered to pose an immediate risk to the public or the environment.
Other	

*Efforts to obtain a voluntary correction of deficiencies through informal enforcement, such as verbal warnings or written notices, must not exceed sixty (60) days in duration (from the *MS4 Operator's* initial determination until a return to compliance).

PART IV.F.2: Enforcement Tracking (p. 15)

The MS4 Operator must track instances of non-compliance in the SWMP Plan **within 30 DAYS** (note in SWMP where you are keeping ERP reports- "on file electronically at Build Dept"). The enforcement case documentation must include, at a minimum, the following:

Date of report	Click or tap here to enter text.
Name of the owner/operator of the facility or site of the violation (can be redacted from the publicly available SWMP Plan);	Click or tap here to enter text.
Location of the <i>post-construction site</i> ;	Click or tap here to enter text.
Description of the violation/Nature of the complaint*;	Click or tap here to enter text.

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Schedule for returning to compliance;	Click or tap here to enter text.
Description of enforcement response used, including escalated responses if repeat violations occur or violations are not resolved in a timely manner. Follow up actions taken or needed (including response times)*;	Click or tap here to enter text.
Inspection outcomes and any enforcement taken*;	Click or tap here to enter text.
Accompanying documentation of enforcement response (e.g., notices of noncompliance, notices of violations)	Click or tap here to enter text.
Any referrals to different departments or agencies;	Click or tap here to enter text.
Date violation was resolved.	Click or tap here to enter text.

***Part VI.E.4a.iii & iv**

Initiate follow-up actions (i.e., maintenance, repair, or higher- level inspection) **within thirty (30) days** of post-construction SMP inspection

Initiate enforcement **within sixty (60) days** of the inspection if follow-up actions are not complete

Training and Procedures: Post-Construction SMP Inspection & Maintenance Program (p. 37)

- a. The training provisions for the MS4 Operator's post-construction *SMP* inspection and maintenance procedures (Part VI.E.4.a.):

If new staff are added, training on the MS4 Operator's post-construction <i>SMP</i> inspection and maintenance procedures (Part VI.E.4.a.) and procedures outlined in the <i>Department</i> endorsed program must be given prior to conducting any post-construction <i>SMP</i> inspection and maintenance;	Click or tap here to enter text.
For existing staff, training on the	Click or tap here to enter text.

<i>MS4 Operator's</i> post-construction <i>SMP</i> inspection and maintenance procedures (Part VI.E.4.a.) and procedures outlined in the <i>Department</i> endorsed program must be given prior to conducting any post-construction <i>SMP</i> inspection and maintenance and once every five (5) years, thereafter; and	
If the post-construction <i>SMP</i> inspection and maintenance procedures (Part VI.E.4.a.) are updated (Part VI.E.4.d.), training on the updates must be given to all staff prior to conducting post-construction <i>SMP</i> inspection and maintenance	Click or tap here to enter text.
The names, titles, and contact information for the individuals who have received post-construction <i>SMP</i> inspection and maintenance procedures training and update annually.	Click or tap here to enter text.

APPENDIX B

Example “IDDE Notice of Violation” Letter

Minimum Control Measure III, IDDE Notice of Violation Letter

DATE

[Owner]

[Owner Address]

RE: Illicit Discharge Activity– Directing Wash Water to Storm Drain

Dear [Owner],

This letter is in reference to an incident involving the directing of wash water to the municipal storm drain within the Town of Haverstraw, NY. It has been reported to the Highway Department that this activity is occurring at [Insert Location]. The Town is a regulated municipality under NYSDEC's SPDES General Permit for Stormwater Discharges from Municipal Separate Storm Sewer Systems (GP-0-24-001). Per Part VI.C of GP-0-24-001, the Town is responsible to prohibit, through a local law, illicit discharges into the storm sewer system, and implement appropriate enforcement actions. Directing water to the storm drain is an illicit activity under the Town's local legislation Part II, Chapter 202, Article 1, Section 11. A court appearance ticket is enclosed.

This action must cease immediately. Wash water, particularly when grease is likely to be present, should be directed to a drain with a connection to a sanitary sewer, or in a manner where the water will not enter the storm drain.

Please also note that directing wash water to the storm drain may increase pollutants such as phosphorus to the local water bodies, which may be listed on the NYS 303(d) impaired waterbody list. It is important that the Town remain in compliance with State regulations, and that Town storm drains are utilized only for compliant stormwater activities.

Sincerely,

Town of Haverstraw

Highway Department

Electronic Signature List

This list keeps track of individuals who meet the initial training and annual review requirements for MM 4 and MM 5. See MS4 General Permit Parts VI.D and VI.E for reference.

MM 4: Construction Oversight Procedures Training

Initial Training in MS4 Construction Oversight Procedures (Part VI.D.3.b-d) (p.30-31):

<u>YEAR</u>	<u>NAME</u>	<u>TITLE</u>	<u>CONTACT INFO</u>
2025	Glenn McCreedy	P.E.	
2025	Stuart Strow	P.E.	
2025	Alena Guckian	P.E.	
2025	Mathew Raquet		
2025	Michael Scarangella		
2025	Kevin Costabile		
2025	Mark Walton		
2025	David Smith		

Annual Review of MS4 Construction Oversight Procedures (by April 1) (Part VI.D.3.e) (p.31):

<u>YEAR</u>	<u>NAME</u>	<u>TITLE</u>	<u>CONTACT INFO</u>
2025	Glenn McCreedy	P.E.	
2025	Stuart Strow	P.E.	
2025	Alena Guckian	P.E.	
2025	Mathew Raquet		
2025	Michael Scarangella		
2025	Kevin Costabile		
2025	Mark Walton		
2025	David Smith		

Individuals who review SWPPPs that have received 4-Hour Training* (Part VI.D.6) (p.33):

<u>YEAR</u>	<u>NAME</u>	<u>TITLE</u>	<u>CONTACT INFO</u>
2025	Glenn McCreedy	P.E.	
2025	Stuart Strow	P.E.	
2025	Alena Guckian	P.E.	

MS4 Construction Site Inspectors that have received 4-Hour Training* (Part VI.D.8) (p.34):

<u>YEAR</u>	<u>NAME</u>	<u>TITLE</u>	<u>CONTACT INFO</u>
2025	Mathew Raquet		
2025	Michael Scarangella		
2025	Kevin Costabile		
2025	Mark Walton		
2025	David Smith		

* Four (4) hours of Department-endorsed training in proper Erosion and Sediment Control principles from a Soil & Water Conservation District, or other Department-endorsed entity. Training must be completed within 3 years of the EDC (January 2025) and every 3 years thereafter. Individuals who meet the definition of a *qualified professional* or *qualified inspector* are exempt from this requirement.

MM 5: Post-Construction Stormwater Management Training

Initial Training in MS4 Post-Construction SMP Inspection/Maintenance Procedures (Part VI.E.b-c) (p.38):

<u>YEAR</u>	<u>NAME</u>	<u>TITLE</u>	<u>CONTACT INFO</u>
2025	Michael Tamblin	P.E.	
2025	Patrick Brady	P.E.	

Annual Review of MS4 Post-Construction SMP Inspection/Maintenance Procedures (by April 1) (Part VI.E.d) (p.38):

<u>YEAR</u>	<u>NAME</u>	<u>TITLE</u>	<u>CONTACT INFO</u>
2025	Michael Tamblin	P.E.	
2025	Patrick Brady	P.E.	

APPENDIX D

SWPPP Checklist

SWPPP Checklist:

SWPPPs are to be reviewed by qualified individuals at the pre-construction meeting in accordance with the MS4 General Permit Part VI.D.6 (p.33). Use this checklist to review applicable SWPPPs (as defined by the MS4 General Permit Part VI.D.1).*

1. Has the SWPPP reviewer received current 4-Hour Training*? Individuals who have not received this training requirement cannot review the SWPPP. Annually update the individuals who have received the required training in the Electronic Signature Sheet (see the SWMP, **Appendix C**).
2. Review all SWPPPs for conformance with requirements of the NYSDEC Construction General Permit (CGP), as is required by the MS4 General Permit Part VI.D.6.c (p.33).
3. Document the SWPPP review in the Stormwater Management Plan (SWMP), including the information found in Part III.B of the CGP.
4. Is this a *Priority Construction Site*, as defined by MS4 General Permit Part VI.D.5 (p. 32)? See [CCE's Stormwater & Water Quality Interactive Map](#) for assistance, and reference the following items:
 - a) Direct conveyance to a surface water listed in Appendix C of the MS4 General Permit with silt/sediment, phosphorus, or nitrogen as the POC; Classified as AA-S, AA, or A; Classified with a trout (T) or trout spawning (TS) designation.
 - b) With greater than five (5) acres of disturbed earth at any one time.
 - c) With earth disturbance within one hundred (100) feet of any lake or pond; and/or
 - d) Within fifty (50) feet of any rivers or streams
5. If the SWPPP is accepted, issue the **NYSDEC MS4 SWPPP Acceptance Form** (created by the NYSDEC) to the construction site owner/operator.
6. Optional: request the SWPPP in an electronic format which also shows all post-construction practices.
7. Optional: permanently stamp catch-basins with "DO NOT DUMP" notices (as is pictured in the example below).



* Four (4) hours of Department-endorsed training in proper Erosion and Sediment Control principles from a Soil & Water Conservation District, or other Department-endorsed entity. Training must be completed within 3 years of the EDC (January 2025) and every 3 years thereafter. Individuals who meet the definition of a *qualified professional* or *qualified inspector* are exempt from this requirement.

APPENDIX E

Pre-Construction Meeting Checklist

Pre-Construction Meeting Checklist (Part VI.D.3.v)

Pre-Construction Meeting Items

Complete this sheet during the pre-construction meeting, and have the following when conducting the meeting for applicable sites:

- The MS4 General Permit requirements outlined in Part VI.D (p.29-35).
- The SWPPP Review Checklist (for NYSDEC Construction General Permit (CGP) compliance).
- NYSDEC Construction Inspection Form ([MS4 General Permit](#), Appendix D).
- SCRC Enforcement Response Plan for Construction.
- SCRC Enforcement Response Plan for Post-Construction.
- The applicant's **NYSDEC Notice of Intent (NOI)** form or access to the [NYSDEC NOI Database](#) (needed to fill in the construction and post-construction inventories).

Date:

Contractors **Must Bring the Following:**

1. The completed and signed **NOI** form (needed for the Town to fill in Construction/Post-Construction Inventory).
2. Qualified inspector's proof of current 4-Hour Training*.

Required Attendees:

1. The MS4 Operator. Fill in name/contact information:
2. The owner/operator listed on the [NYSDEC NOI Database](#) (If different than the MS4 Operator listed above). Fill in name:
3. The contractor(s) responsible for implementing the SWPPP associated with the construction activity. Fill in the contractor's name(s):
4. The qualified inspector (if required for the construction activity by Part IV.C of the CGP). Fill in the inspector's name):

* Four (4) hours of Department-endorsed training in proper Erosion and Sediment Control principles from a Soil & Water Conservation District, or other Department-endorsed entity. Training must be completed within 3 years of the EDC (January 2025) and every 3 years thereafter. Individuals who meet the definition of a *qualified professional* or *qualified inspector* are exempt from this requirement.

Appendix E

Checklist Items:

1. Confirm the project site received coverage under the CGP or an individual SPDES permit. Copy of the **NOI** form completed and signed.
2. Have contractors and subcontractors identified at least one individual that has received the current 4-Hour Training as required by the CGP and the MS4 General Permit?
3. Review the MS4 General Permit Part VI.D.3 (p.30) (also review “Construction Oversight Program” in the SWMP) and expectations for compliance (see below).
4. Complete the construction site inventory (using the completed **NOI** form or the [NYSDEC NOI Database](#)). Is this a **priority site** according to the MS4 General Permit Part VI.D.5 (p.32)? If so, what makes it a priority site?

APPENDIX F

**Active Construction Site Inspection,
Post-Construction SMP Inspection, and
Construction Site Close-Out Checklists**

Active Construction Site Inspection, Post-Construction SMP Inspection, and Construction Site Close-Out Checklist

Active Construction Site Inspections (Part VI.D.8) (p.34)

1. **Annually**, inspect all sites with active construction activity that are identified in the construction inventory (Part VI.D.4.) during active construction after the pre-construction meeting has taken place, or sooner if deficiencies are noted that require attention. Ensure all MS4 construction site inspectors receive the required 4-Hour Training* prior to conducting construction site inspections.
2. Inspections must be conducted using the NYSDEC Construction Site Inspection Report Form found in the [MS4 General Permit](#), Appendix D). **Review the Inspection Form.** Follow up to corrective actions must be completed within timeframes established by the Construction General Permit (CGP) and the Enforcement Response Plan.

Post-Construction Site Inspections (Part VI.E.4) (p.37)

1. **Post Construction:** Complete the post-construction site inventory (using the completed **NOI** form or the [NYSDEC NOI Database](#)). The SWPPP must include an Operations and Maintenance (O&M) plan that includes inspection and maintenance schedules, as well as actions to ensure continuous and effective operation of each post-construction Stormwater Management Practice (SMP). The SWPPP must also identify the entity that will be responsible for the long-term operation and maintenance of each SMP.
2. Send a letter to the owner/operator of qualifying construction sites (see MS4 General Permit Part VI.E.1 for qualifications) regarding follow up SMP inspections that must be completed by the owner/operator following construction.
3. Ensure that the post-construction SMP is inspected at the frequency defined in the owner's/operator's SWPPP plan. Use the NYSDEC's [Post-Construction SMP Inspection Checklist](#) or an equivalent form containing the same information to complete the inspections. The MS4 Operator can only accept Level 1 inspections on the checklist by private owners inspecting post-construction SMPs.
3. The Enforcement Response Plan (ERP) provides provisions to initiate follow-up actions, if necessary (i.e., maintenance, repair, or higher-level inspection) **within thirty (30) days of an inspection**; and Provisions to initiate enforcement **within sixty (60), days** of the inspection if follow-up actions are not complete.

* Four (4) hours of Department-endorsed training in proper Erosion and Sediment Control principles from a Soil & Water Conservation District, or other Department-endorsed entity. Training must be completed within 3 years of the EDC (January 2025) and every 3 years thereafter. Individuals who meet the definition of a *qualified professional* or *qualified inspector* are exempt from this requirement.

4. Maintain all inspection records in the SWMP Plan.

Construction Site Close-Out

1. Final site inspection. The MS4 Operator must ensure that a final site inspection is conducted. Document the completion of the final site inspection using **the Construction Site Inspection Report Form** ([MS4 General Permit](#), Appendix D), or an equivalent form containing the same information. Alternatively, accept the construction site owner/operator's qualified inspector final inspection certification as required by the CGP.
2. Optional: Submit "As-Builts" for SMPs including sloping to ensure compliance with pre-construction plans (refer to the [NYSDEC MS4 Operator Forum](#) recording on 12/4/24 (at 30:57).
3. NOTICE OF TERMINATION (Town sign-off). **The Notice of Termination (NOT)** must be signed by the MS4 Operator as required by the CGP for projects determined to be complete, in accordance with MS4 General Permit Part X.J (p.123).

APPENDIX G

Example “Stop Work Order/Notice of Violation” Letter

STOP WORK ORDER/NOTICE OF VIOLATION

[Date]

[Owner/Operator]

[Address]

**Re: [Construction Site Name/Location]
 Improper Erosion and Sediment Controls
 Discharge of Turbid Water to the MS4**

Dear [Owner/Operator]:

On [date of occurrence], the Town conducted an inspection of the site referenced above due to a complaint. At the time of inspection, erosion and sediment controls were found to be inadequate. Turbid water was exiting the site and entering the Town's storm drain system and discharging to [water body name]. The Town is a regulated municipality under NYSDEC's SPDES MS4 General Permit (GP-0-24-001). Sediment from construction has been identified as a pollutant generating activity in the Town's Storm Water Management Plan (SWMP). Per the MS4 General Permit and local law Part II, Chapter 202, Article II, Erosion and Sediment Control, the Town is responsible for minimizing pollution caused by stormwater runoff. During the pre-construction meeting you were made aware of and [provided with education](#) on our local laws, and the impact of sediment on local waters. A Stop Work Order/Court Appearance Ticket is enclosed.

Sediment runoff is high in nutrient content, particularly nitrogen and phosphorus, which greatly impact the quality and economic value of the receiving waterbodies and watersheds. Proper erosion and sediment controls must be immediately implemented at this site, and the discharge of turbid water from the site must immediately cease. It is important that the Town remain in compliance with NYSDEC regulations and our local laws so that construction sites are maintained at all times, and Town storm drains are utilized only for compliant storm water activities.

Should you have any questions, please feel free to contact me at [phone number].

Sincerely,

Town of Haverstraw
Building Inspector

APPENDIX H

Example “Notice of Termination” Letter

NOTICE OF TERMINATION LETTER

[Date]

[Owner/Operator]

[Address]

RE: Notice of Termination
 [Construction Site Name/Location]

Dear [Owner/Operator]:

A recent review of the Storm Water Pollution Prevention Plan (SWPPP) for the above-mentioned project has shown that this project is covered under the MS4 General Permit (GP-0-24-001). Projects that receive coverage under this permit are required to submit a Notice of Termination (NOT) upon completion of final site inspection. Our records do not show that a NOT has been submitted for this project.

The Town is a regulated municipality under the MS4 General Permit (GP-0-24-001). Per MS4 General Permit Part VI.D.9, the Town is responsible to ensure that a final site inspection is conducted. A signature from the Building Department is required on the NOT.

The NOT, which must be completed and submitted to the Building Department at once, can be found at <http://www.dec.ny.gov/chemical/43133.html#Permit>. The Town anticipates your compliance with the requirements of the MS4 General Permit.

Sincerely,

Town of Haverstraw
Building Department

APPENDIX I

Example “Post-Construction SMP Inspection Report” Letter

Minimum Control Measure V, Post-Construction SMP Inspection Report letter

Date:

[Owner/Operator Address, Or HOA Address]

RE: [Location of Construction Site]
Post-Construction Stormwater Management Practice Inspection Reports

Dear [Owner/Operator]:

The Town of Haverstraw is a New York State Department of Environmental Conservation (NYSDEC) regulated Municipal Separate Storm Sewer System (MS4) community. Per NYSDEC MS4 General Permit Part VI.E.4 the Town is therefore required to implement a Post-Construction Stormwater Management Practice (SMP) inspection and maintenance program. The purpose of the program is to ensure the long-term performance of SMPs in removing pollutants from stormwater runoff.

According to our records an applicable SMP is on-site at your location. Please forward to our attention an inspection report at the frequency specified in the Operation and Maintenance (O&M) plan contained in your approved SWPPP document. Per NYSDEC requirements, please document the inspection using the [Stormwater Management Practices \(SMP\) Inspection Checklist](#) (or an equivalent form containing the same information). The Town can only accept **Level 1 inspections** on the SMP Inspection Checklist by private owners inspecting post- construction SMPs.

Please forward the inspection report by [required date]. The maintenance procedures of SMPs are enforced through the [Town of Haverstraw Local Legislation Chapter 137, Stormwater Management, Article XVI, Stormwater Management and Erosion and Sediment Control, §137-95.B](#). Failure to comply will put you in violation of the Local Legislation, and a Notice of Violation will be issued. The Post-Construction SMP inspection and maintenance program further requires the Town to utilize Enforcement Response Plans to initiate follow-up actions (i.e., maintenance, repair, or higher-level inspection) within thirty (30) days of inspection; and to initiate enforcement within sixty (60) days of the inspection if follow-up actions are not complete.

The Town appreciates your cooperation to comply with NYSDEC's new stormwater permit requirements. SMPs are vital to controlling and treating stormwater pollutants. Nutrient loading in sediment is a leading pollution issue that is greatly impacting surface water quality and leading to aquatic weeds, harmful algae growth, and degradation of drinking and fishing waters. It is important that the Town remain in compliance with State regulation, and that SMPs within the Town boundary remain fully functional.

Sincerely yours,

Town Engineer
Building Department

APPENDIX J

Public Notices: Yearly SWMP and Annual Report Review

LEGAL NOTICE
PUBLIC HEARING

TOWN OF HAVERSTRAW –MS4 ANNUAL REPORT FOR 2024

PLEASE TAKE NOTICE that the Town Board of the Town of Haverstraw does hereby schedule a Public Hearing TO HEAR ALL COMMENTS AND SUGGESTIONS REGARDING THE TOWN'S 2024 MS4 ANNUAL REPORT WHICH HAS BEEN PREPARED PURSUANT TO THE NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION SPDES GENERAL PERMIT FOR STORMWATER DISCHARGES FROM MUNICIPAL SEPARATE SEWER SYSTEMS (MSRS), PERMIT NO. GP-02-02. Said Public Hearing is being held on Tuesday, March 25, 2025 at 7:10 p.m. in the Meeting Room of the Town Hall, One Rosman Road, Garnerville, New York. All interested parties are invited to attend and shall be heard by the Board.

WILLIAM M. STEIN
TOWN ATTORNEY
MARCH 12, 2025

BY ORDER OF THE TOWN BOARD
RAQUEL VENTURA
TOWN CLERK
TOWN OF HAVERSTRAW

11130383

APPENDIX K

Certification of Local Laws



TOWN OF HAVERSTRAW

HOWARD T. PHILLIPS, JR.

Supervisor

ISIDRO CANCEL
RALPH W. KIRSCHKE
Councilmen

MICHAEL J. GAMBOLI
Director of Finance

VINCENT J. GAMBOLI
JOHNNY ORTIZ
Councilmen

WILLIAM M. STEIN
Town Attorney

March 18, 2025

Howard T. Phillips, Jr., Supervisor
Town of Haverstraw
1 Rosman Road
Garnerville, NY 10923

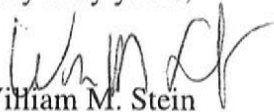
RE: Certification of Local Laws

Dear Supervisor Phillips:

I hereby certify the following:

1. **Local Law Chapter 137, Part 3 Stormwater Management, Article XV – Illicit Discharges, Activities and Connections to Separate Storm Sewer System and Article XVI Stormwater Management and Sediment and Erosion Control, adopted by the Town Board of the Town of Haverstraw on 5-22-2006 is hereby equivalent to the NYSDEC Sample Local Law for Stormwater Management and Erosion and Sediment Control.** <https://ecode360.com/9394848>
2. **Local Law Chapter A172-6 Construction Standards-Storm Drainage adopted by the Town Board of the Town of Haverstraw on 2-23-2004, is hereby equivalent to the NYS Model IDDE Law.** <https://ecode360.com/10141797>

Very truly yours,


William M. Stein
Town Attorney

cc: Raquel Ventura, Town Clerk
Pat Brady, Stormwater Management Officer
Michael Tamblin, Town Consulting Engineer