

Town of Brunswick Stormwater Management Program (SWMP)



Stormwater Management Program and Stormwater Management Program Plan **MS4 SPDES Registration Number: NY20A015**

Introduction and Acknowledgements

The purpose of this document, the Town of Brunswick Stormwater Management Plan, is to describe Town of Brunswick's Stormwater Management Program (SWMP), the specific practices and policies that the Town undertakes to reduce the discharge of pollutants into waterbodies and meet the requirements of the New York State Department of Environmental Conservation (NYSDEC) State Pollutant Discharge Elimination System (SPDES) General Permit for Stormwater Discharges from Municipal Separate Storm Sewer Systems (MS4s).

As a regulated Traditional Land Use Control MS4 Operator, Town of Brunswick Town is required to develop, implement, and revise as needed a Stormwater Management Program (SWMP) that satisfies the requirements for each of six required program components, known as minimum control measures (MCMs). Revisions occur when goals are met or updated, staffing changes, or funding changes. The MS4 Operator must identify Pollutants of Concern (POCs), waterbodies of concern, and specific practices that reduce pollutants in stormwater to the maximum extent practicable (MEP). Measurable goals must be established, and management practices have to be implemented to achieve those goals for each of the MCMs.

MS4 Minimum Control Measures (MCMs)

- 1. Public Education and Outreach on Stormwater Impacts**
- 2. Public Involvement/Participation**
- 3. Illicit Discharge Detection and Elimination (IDDE)**
- 4. Construction Site Stormwater Runoff Control**
- 5. Post-Construction Stormwater Management**
- 6. Pollution Prevention/Good Housekeeping for Municipal Operations**

This plan describes the goals established under each MCM and the activities that Town of Brunswick engages in to meet these goals. There is an Implementation Framework included for each MCM that lists the specific activity, the measurable parameter for that activity, who is responsible for ensuring compliance, and who will be involved in the activity. Also included in the SWMP Plan are supporting documents, charts, maps, tables, and descriptions of abbreviations and terms used throughout the document.

Town of Brunswick Administration (TBA), Water and Sewer Department (WSD), Town of Brunswick Highway (TBH) and Town of Brunswick Building Department (TBD) work together to implement the Stormwater Management Program (SWMP) (see Figure 1.). This document provides specific details of the efforts that Town of Brunswick undertakes to ensure that pollution from stormwater runoff to our surface waterbodies is reduced or eliminated "to the maximum extent practicable (MEP)."

The SWMP is an evolving program. We encourage your comments and especially your suggestions on ways that we can improve the Town of Brunswick Stormwater Program.

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Public Contact Information

The public contact for general information on TOWN OF BRUNSWICK STORMWATER

Town of Brunswick
336 Town Office Road
Troy, NY 12180
(518) 279-3461

The public contact for SWPPP reviews and enforcement actions:

Stormwater Management Officer Town of Brunswick
336 Town Office Road
Troy, NY 12180
(518) 279-3461

The stormwater hotline to report suspected illicit discharges and other stormwater violations and concerns:
During Business Hours (518) 279-3461

The dedicated stormwater email to report complaints related to construction stormwater activity:
Info@townofbrunswick.ny.gov

Or for any concerns or comments, including comments on this SWMP Plan and the MS4 Annual report you can email: Stormwater@townofbrunswickny.gov

The Town of Brunswick Stormwater webpage is at: <https://brunswickny.gov/page.php?p=26>.

Record Keeping

All records (except for SWPPPs, SWPPP reviews, IDDE inspections, and post construction practices inspections) are kept and can be reviewed at:

Town of Brunswick Building Department
336 Town Office Road
Troy, NY 12180
(518) 279-3461

The most up-to-date version of the Notice of Intent (NOI) can be found at
<https://brunswickny.gov/files/MS4%20eNOI%20Acknowledgement.pdf>

Stormwater Pollution Prevention Plans (SWPPPs), and SWPPP reviews, can be reviewed at:
Town of Brunswick Building Department
336 Town Office Road
Troy, NY 12180
(518) 279-3461

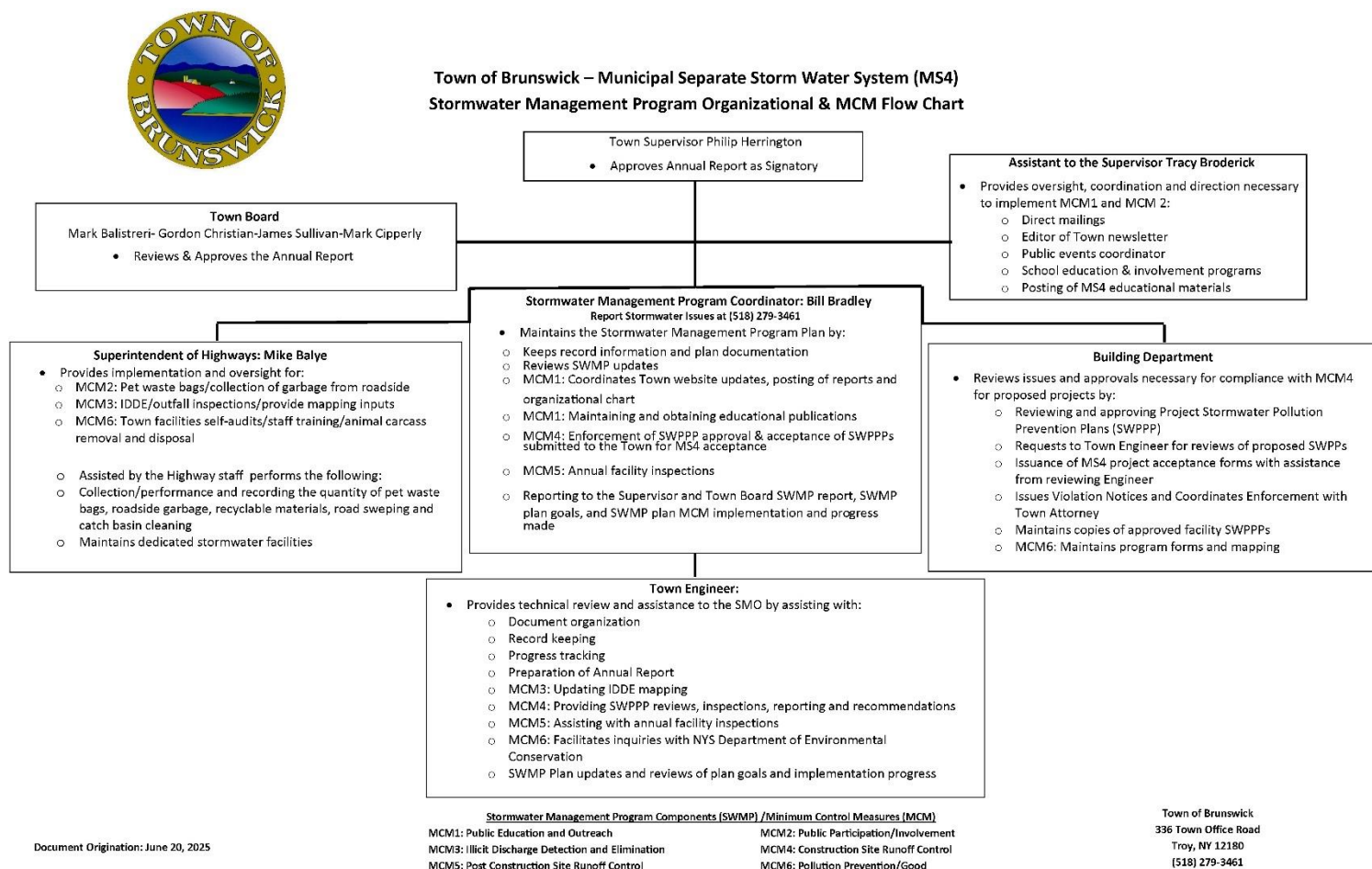
IDDE inspections, construction and post construction practices inspection reports can be reviewed at:

Town of Brunswick Building Department
336 Town Office Road
Troy, NY 12180
(518) 279-3461

Records on chemical inventories from, and building inspections of all Town facilities are kept at

Town of Brunswick Highway Department
336 Town Office Road
Troy, NY 12180
(518) 279-3461

Figure 1- Organizational Chart



Background Information

The Clean Water Act (CWA) was developed in 1972 as sweeping amendments to the Federal Water Pollution Control Act of 1948, the first major law to address water pollution. The US Environmental Protection Agency (EPA) developed Phase I of the National Pollutant Discharge Elimination System (NPDES) Stormwater Program in 1990, in response to the 1987 amendments to the CWA. In New York State, the Department of Environmental Conservation (DEC) is responsible for administering the program under the State Pollutant Discharge Elimination System (SPDES) permit program. Phase I required SPDES permit coverage for stormwater discharges from medium and large Municipal Separate Storm Sewer Systems (MS4s), construction activities that disturbed five or more acres of land, and eleven categories of industrial activity.

In 2003, Phase II expanded the SPDES stormwater permit program to include stormwater discharges from certain regulated small MS4s and construction activities that disturb one or more acre of land. The SPDES MS4 permit required regulated MS4s to develop and fully implement a stormwater management program by 2008. The MS4s under Phase II were required to provide an initial outline of planned management practices and to identify measurable goals that could be used to assess progress towards full implementation of an appropriate stormwater management program. The DEC specified a few required actions and provided a list of approved practices, but the individual MS4s were encouraged to tailor development of their Stormwater Management Programs to best address local stormwater concerns. The most recent permit (GP-0-24-001) provides more specific guidelines for compliance and the Town will be working to update the SWMP over the next 5 years in accordance with the new permit requirements and deadlines.

Municipal areas that meet certain population density criteria, based on the US Census, are required to gain coverage for the discharge of stormwater by the DEC under Phase II of the SPDES General Permit for Stormwater Discharges from MS4s. The original Phase II MS4 regulated area, based on the Urbanized Area from the 2000 Census, included part of Town of Brunswick (Figure 2).

The Town of Brunswick is a designated Municipal Separate Storm Sewer Systems Community (MS4 Community). Small municipal stormwater sewer systems (MS4s) are communities located within the boundaries of Census Bureau Tracts defined as "urbanized areas". The Stormwater Management of these urbanized areas are regulated under EPA's Phase II Stormwater Rule. This requires the MS4 Communities to develop a stormwater management program that will reduce the amount of pollutants carried by stormwater during storm events to waterbodies to the "maximum extent practicable". The goal of the program is to improve water quality and recreational use of waterways.

As such the Town is required by Federal and State laws and statutes to have in place a program for managing stormwater in the MS4 areas of the Town and by default the whole town for construction related activities. One key program goal is to educate the public as to the importance of keeping our stormwater clean. This is a very important consideration since the Town of Brunswick enjoys a wide variety of water resources. How stormwater is maintained and managed in your own watershed area can impact you directly. Nearly all homes and business in the Town use wells or the Tomhannock Reservoir for their drinking water. Increased sediment runoff, or excess use of lawn and garden fertilizers and pesticides or products dumped down your household drains can pollute your source of water you use for recreation or drinking water. We encourage everyone to be the steward of your own watershed and keep it clean.

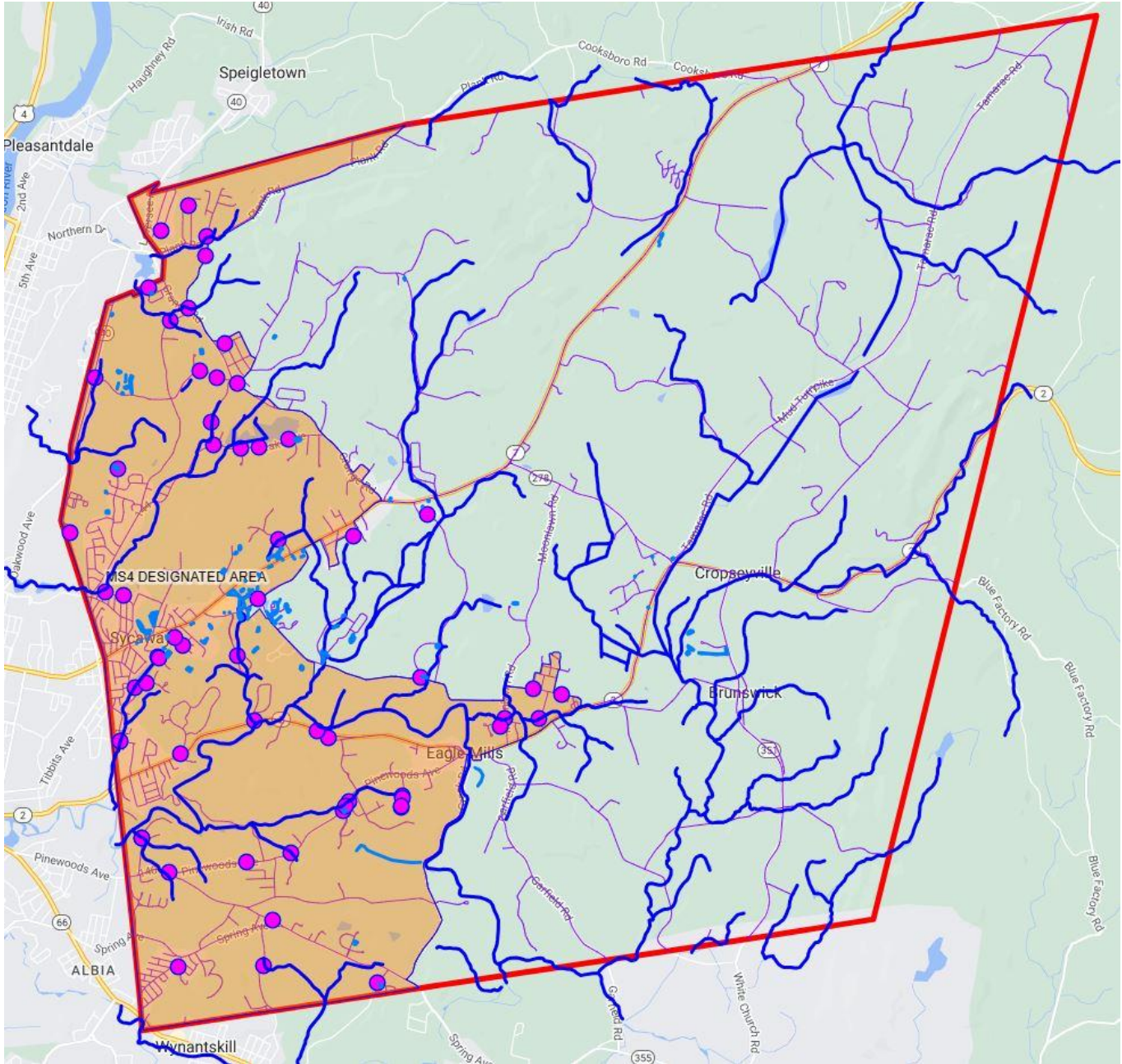
In Town of Brunswick and the surrounding communities we are fortunate to have an abundance of water resources. Our Stream, Creeks and Pond derive the water from and flow to multiple water shed areas, the Postenkill, Quackenkill, Upper Hudson River Water Shed, Hudson River Estuary, Piscawayne and the Wyantskill

to name a few. These important water sheds powered the industrial revolution, help to win the American Civil War and provide the water we drink. We can enjoy our water resources for fishing, swimming, boating, and generally enhancing our lives.

Town of Brunswick contains several renowned trout fishing streams some are in the urbanized regulated MS4 area including parts of the Poestenkill, Wyantskill, Quakenkill and the Sweetmilk Creek.

Town of Brunswick also contains many wetlands, providing essential habitat for many species of fish, birds, mammals, amphibians, reptiles, insects, and plants. Wetlands can assist with flood control by attenuating water and slowing it down. Wetlands also clean water by serving as a filter for silt, and sediment, as well as nutrients and chemicals that can otherwise pollute rivers and ponds downstream. Wetlands also provide recreational opportunities such as fishing, canoeing, and birdwatching. The Town has ownership of several hundred acres of wetlands and riparian buffers.

Figure 2-Town of Brunswick MS4 Area



Waterbodies of Concern

All waterbodies are classified by designated best use: a goal for water quality that is attainable for that waterbody. Designated uses include drinking water supply, swimming, boating, fishing, and/or aquatic life support. Waters that do not meet their designated use are considered impaired. Fortunately, the Town of Brunswick does not currently have any water bodies that are listed by the NYSDEC on the Section 303(d) list as impaired. There is a publicly facing map on the Town Web site that lists all of the significant water resources in the Town and their classification.

Pollutants of Concern (POCs)

The SPDES MS4 permit requires that municipalities identify pollutants of concern (POCs) in the regulated MS4 area. POCs are pollutants that have the potential to produce the greatest impact on our waterbodies, keeping them from meeting their designated use.

Silt/Sediment

One of the most common POCs to our waterbodies is sediment: the loose material that can be carried by stormwater to a waterbody. Nutrients and other chemical pollutants can adhere to the sediment and get carried along with it into nearby waters. Suspended sediment can cause turbidity, limiting the distance that light can penetrate into the water, inhibiting the growth of aquatic plants that other species depend on. Sediment can also settle and smother aquatic habitats that fish rely on for depositing eggs. Anytime soil is exposed to stormwater, erosion can occur, which can lead to more sediment in our waterbodies, and thus more turbidity.

In Town of Brunswick, sediment is generated from a variety of sources. It can come from the soil erosion that occurs when bare soil on construction sites is exposed to stormwater or from the natural erosion of stream banks. Sediment is present in runoff from urban areas and agricultural lands, as well as from natural areas.

Town of Brunswick has policies in place to control sediment runoff from construction sites. These are further described in MCMs 4&5. The Rensselaer County Soil and Water Conservation District (RC SWCD) works with local farmers to develop plans to reduce erosion and control other pollutants on agricultural sites.

Many of the POCs to Town of Brunswick can be generated from the activities associated with maintaining Town owned highways, buildings, and lands. The Town uses salt on our roadways in the winter and paves with oils and asphalt products in the summer. The Town cleans and paints buildings, and mows and maintains its properties in the spring, summer, and fall. All of these activities have potential to release pollutants into the stormwater system.

Salt

Road salt is used as a deicer on Town roads and parking lots. Salt can be toxic to freshwater organisms as stormwater from rain and snow melt washes the roads and carries any pollutants with it to waterbodies. Road salt can destroy protective roadside vegetation, degrade soil, and corrode vehicles, bridges, and other infrastructure. The Town will continue to look for alternatives to salt that are economically feasible and minimize the application of salt to produce less concentrated runoff without compromising public safety. One possible alternative that the Town is exploring is the use of brine as a deicer. Until safe, effective substitutes are found, following best management practices (BMPs) and recommendations can help in effective and efficient use of deicing materials while reducing the impact and preserving the quality of our streams and lakes. Some of the BMPs for proper salt storage and application are addressed in MCM 6: Pollution Prevention/Good Housekeeping for Municipal

Operations.

Heavy Metals and Hydrocarbons

Other POCs that can occur with Town maintenance operations are heavy metals (such as lead, zinc, and mercury) found in many products (such as batteries, fuels, paints, pesticides, and cleaners) and hydrocarbons (from oils, grease, fuels, hydraulic fluids, pesticides, and engine emissions). As these products are used, spilled, or breakdown, they can leave behind pollutants that can be carried by stormwater into waterbodies. Metals are toxic to aquatic organisms and tend to bioaccumulate, meaning that they increase in concentration in an organism with continued exposure over time. Metals and other chemicals are often the cause of fish advisories—health warnings about eating certain fish. And they have the potential to contaminate drinking water supplies. Some of the maintenance practices that help control these pollutants are covered in MCM 6. Illicit discharges and dumping of petroleum products are addressed in MCM 3: Illicit Discharge Detection and Elimination (IDDE).

Nutrients and Pathogens

Nutrients, such as nitrogen, phosphorous, potassium, and ammonia, can be found in fertilizers, livestock, and pet waste, decaying vegetation (such as grasses and leaves), as well as sewer and septic system overflows and leaks. These wastes can also leave pathogens (harmful bacteria and viruses) in our waters. Nutrients can lead to an excess growth of weeds and algae whose decay can lead to a depletion of oxygen in waterbodies, as well as potential formation of hazardous toxins. Dissolved oxygen depletion in waterbodies can lead to fish die-offs and other negative impacts. MCM 3: IDDE covers some efforts to track down and eliminate nutrients and pathogens generated from septic system and sanitary waste leakage and cross connections.

Figure 4- Common Pollutants in Stormwater Runoff

Pollutants in stormwater runoff (from LakeSuperiorStreams.org)		
POLLUTANT		WHAT DOES IT DO?
Increased Runoff Land alterations increases the rate and amount of runoff from the watershed entering the stream.		Carries pollutants, erodes stream channel and banks, and destroys instream habitat
Sediment Dirt and sand on roads, driveways, and parking lots or eroded sediment from disturbed surfaces (e.g. construction sites) enters stream with stormwater runoff; increased flow causes stream bank erosion		Smothers aquatic habitat, depletes oxygen, reduces water clarity, and carries nutrients and toxic contaminants
Nutrients Excess fertilizers on lawns or fields, failing septic systems, and animal waste		Stimulates excessive plant growth, lowers dissolved oxygen levels, degrades aesthetics and destroys native aquatic life
Temperature Warmer water caused by runoff from impervious surfaces, removal of streamside vegetation, and reduction in groundwater flows		Harmful to trout and other cold water species, promotes spread of invasive species and excessive plant growth, reduces dissolved oxygen levels in water
Bacteria Potentially pathogenic microscopic organisms in failing septic systems, sewer overflows, and animal (including pet) waste		Harmful to humans; untreated waste can cause numerous diseases.
Toxic Contaminants/Heavy Metals Heavy metals such as Mercury, cleaning compounds, pesticides and herbicides, industrial by-products such as dioxin, and vehicle leakage of oil, gas, etc.		Harmful to humans and aquatic life at fairly low levels; many resist breakdown and some accumulate in fish and other animal tissues (including human), and can lead to mutations, disease, or cancer

Mapping

The MS4 Operator (Town of Brunswick) has developed and maintains a comprehensive system mapping for the designated area. In accordance with the permit the current mapping includes MS4 outfalls, interconnections, preliminary storm-sewershed boundaries, and MS4 infrastructure details, such as conveyance systems, culvert crossings, and stormwater structures

MCM 1: Public Education and Outreach on Stormwater Impacts

Under the SPDES MS4 regulations, Town of Brunswick is considered a "Traditional Land Use Control MS4" refers to a Municipal Separate Storm Sewer System (MS4) owned by a municipality that also has the authority to enforce land use controls, such as zoning and subdivision regulations, to manage stormwater pollution. Unlike "Non-Traditional" or "Traditional Non Land Use Control" MS4s, these municipalities can use their local regulatory authority and the six Minimum Control Measures (MCMs) of their Stormwater Management Program (SWMP) to regulate land development and minimize the amount of pollutants discharged into their storm sewer systems. As such, our public includes our staff, contractors, and visitors. The Town 's education efforts focus on internal staff development and educating the visitors to our Town facilities on pollution prevention. The Town is also very committed to providing assistance to our partner in the Rensselaer County Stormwater Coalition.

Key Goals

The goal for MCM 1 is to ensure that our employees, contractors, and visitors to our facilities are aware of the most prevalent pollutants and how our daily work activities can have an impact on reducing the pollutants that enter our waterbodies. To reach this goal, the town engages in a variety of educational activities.

Activities/Practices

The Town provides brochures on a variety of stormwater topics for the general public at the Town Office Building lobby as well as at the annual local events, such as our summer concert series. Brochure topics include proper lawn care, pet waste management, household hazardous waste disposal, low impact development, waste oil disposal, water conservation, vehicle washing, fish advisories, values of wetlands and riparian buffers, permit requirements for construction sites, and other areas of stormwater pollution impact. Providing additional information to contractors and home builders who cause soil disturbance.

All Town of Brunswick employees' other relevant staff will be trained annually on MS4 SPDES permit information, IDDE, prevention practices for municipal operations, construction site stormwater pollution prevention, and green infrastructure practices

Town of Brunswick maintains a webpage at <https://brunswickny.gov/page.php?p=26> that contains a variety of stormwater pollution prevention information as well as our Stormwater Management Program and contains additional information and links to additional websites (Figure 5).

Town of Brunswick maintains a social media presence reaching many Town Residents.

Further Course of Action

- Continue to educate our public, our employees, contractors, and municipalities on the impact that all of us can have to decrease the harmful pollutants stormwater carries to our waterways.
- Increase the sharing of information on social media regarding stormwater and related water quality topics.
- Integrate MS4 program training into existing Town employee training days for relevant staff.
- Continue to examine more effective ways to educate the public on stormwater pollution.

MCM 2: Public Involvement/Participation

As previously discussed in MCM 1, the Town as a traditional land use control MS4 is required to provide participation opportunities to the general public. The Town since the Covid Pandemic has had few public events. The Town does own 160 acres of conserved land where the Town has developed a nature trail system. The trail system traverses several different habitats north upland forest, several ponds and streams and a large 40 acre wetland area bisected by the Sweetmilk Creek. The 537 Scout Troop took on an Eagle Scout project in 2023 to construct a foot bridge across an unnamed tributary to the Sweetmilk Creek. The Town has worked with Trout Unlimited to obtain a grant from 2024 Hudson River Estuary Grant Program for the **“Poestenkill Reconnection: Sweetmilk Creek Road Culvert Replacement Project”** This project will help to reconnect impassable section of the Sweetmilk Creek with a open bottom culvert design to improve trout spawning.

Key Goals

The goal for MCM 2 is to involve more people in learning about and taking stewardship of the environment. With our partner the Rensselaer County Stormwater Coalition, our Brunswick Community Library the Boy Scouts and other civic groups, we will continue to expand and increase the public participation in the programs that are described below.

Activities/Practices

The Town Brunswick is developing more programs for public participation in the future. Programs will include activities for school age children and adults. Currently the Town has sponsored a yearly hazardous waste collection day. There a public facing Stormwater Map with provides information on stream classification, zoning, wetlands, location of stormwater management practice, active construction sites in the Town.

The Town maintains their Stormwater web page at <https://brunswickny.gov/page.php?p=26> with a link to our dedicated stormwater email and a phone number for you to call with your concerns. This webpage will also provide a public link to the Stormwater draft annual report and summary when prepared. The draft report is also presented at a meeting of the Brunswick Town Board.

The Town promotes employee recycling through posters, emails, and desk side recycling trays. The Town of

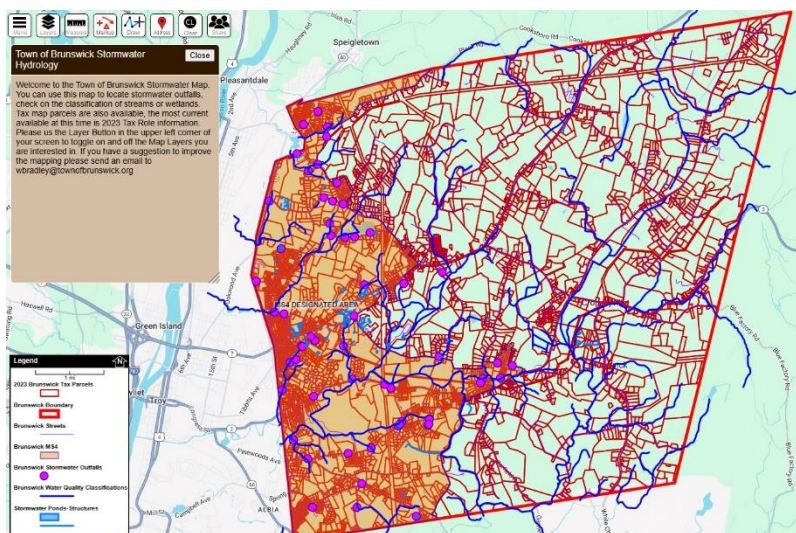
Brunswick holds a household hazardous waste/pharmaceutical/e-waste collection day annually. These events are open to Town of Brunswick residents and registration is required. Residents are encouraged, contact the Town for additional opportunities for public outreach and education. Additionally, batteries, oil, freon containing devices and electronics are accepted for recycling year-round.

The Rensselaer County's Stormwater Coalitions meets every two months; the Coalitions mission is to provide an opportunity for local MS4s to share ideas and discuss improvement and road blocks to improving and protecting the waters of Rensselaer County helping to ensure the resilience of our watershed systems. This is accomplished by coordinating amongst local communities, Rensselaer County Soil and Water Conservation District, the Capital Regional Planning Commission, New York DEC. Meeting are open to local partners including municipalities, local agencies, non- profits, and other groups working on water quality.

Further Course of Action

- Share this SWMP plan and incorporate comments or suggestions from the public into the next revision.
- Update this document as necessary to reflect the changes in the Stormwater Management Program, incorporating any changes called for as updated MS4 SPDES General Permits are issued.
- Continue to offer and update the Public Facing Stormwater Map, making it more accessible and improving functionality.
- Work with our partner agencies and environmental groups to expand opportunities for the public to get

Figure 6-Town of Brunswick Public Stormwater Map



involved with understanding, cleaning up, and protecting our natural waters.

MCM 3: Illicit Discharge Detection and Elimination (IDDE)

An illicit discharge is defined as any discharge to the municipal separate storm sewer system that is not composed entirely of stormwater; except for discharges allowed under a NPDES (or SPDES) permit or waters used for firefighting operations. As a result of these illicit connections, contaminated wastewater can enter into storm drains or directly into local waters without receiving treatment from a wastewater treatment plant. Illicit connections may be intentional or may be unknown to the business owner and often are due to the connection of floor drains to the storm sewer system. Additional sources of illicit discharges can be failing septic systems, illegal dumping practices, and the improper disposal of sewage from recreational practices such as boating or camping.

Key Goals

The goal for MCM 3 is to identify and eliminate all illicit discharges that are entering the Town's storm sewer system. There are a number of steps that will help us to meet this goal: mapping, training, inspections, reporting, tracking, and follow through.

Activities/Practices

Illicit discharge detection and elimination programs are designed to prevent contamination of ground and surface water resources by the monitoring, inspection, and removal of these illegal non-stormwater discharges. An essential element of this program is an ordinance granting the authority to inspect properties suspected of releasing contaminated discharges into storm drain systems. Another important factor is the establishment of enforcement actions for those properties found to be in noncompliance or that refuse to allow access to their facilities. The Town of Brunswick enacted "Illicit Discharge Activities Law No. 6 of 2007([Link to: Local Law No. 6 2007](#)) A Local Law of the Town of Brunswick, NY, Prohibiting Illicit Discharges, Activities and Connections to the Town of Brunswick Separate Storm Sewer System." This local law prohibits anyone from having illicit connections or discharges to the Town storm sewer system (MS4). The law also establishes the authority of the Stormwater Management Officer (SMO) to access and inspect any facility that discharges to the MS4 and to enforce this law through issuing notices of violation or to take other remedial actions as required. *See Appendix page B4: Local Law Number 6 of 2007.*

Illicit discharges are often detected by conducting dry weather inspections of outfalls; called outfall reconnaissance inventory (ORI). An inspection of each of the Town outfalls is conducted at least once every five years. The purpose of these inspections is to detect and eliminate any illicit connections or discharges to the Town storm drainage system. The Town has conducted annual cleaning of all catch basins in the Town further improving illicit connection.

Employees in relevant positions will receive training annually on illicit discharge detection and reporting protocols. The Town also maintains a stormwater email address for the public to report suspected illicit discharges or other stormwater concerns.

The Town updates the outfall maps as needed when changes are discovered through the ORI or when structures are added or removed. Town of Brunswick has collected data and produced a stormwater drainage system map; this consisted of collecting GPS locations and physical structure information on components of the Town's storm sewer system. This will assist with the track down of illicit discharges. The Town of Brunswick maintains an online, cloud-based GIS stormwater management application created by Diamond Maps. This allows for the navigation to, and inspections of outfalls and other stormwater assets with direct input in the field. This online tool will enable the Town to store locations, inspection records, photographs, and other related information

regarding outfalls and other stormwater assets such as green infrastructure practices and stormwater management practices.

Contact For Reporting Illicit Discharge

Stormwater Contact Number: 518 279-

3461 ext 100

Email: Info@townofbrunswick.ny.gov

Further Course of Action

- Complete the adoption of the cloud-based stormwater management application for stormwater inspections to improve the Town's IDDE program.
- Improve procedures for tracking all illicit discharges and their elimination by using cloud-based mapping and documentation.
- Develop/clearly define the monitoring plan.
- Establish a clear calendar schedule for planning inspections

Samples of Illicit Discharges and Outfalls



Oil spill



Illicit Discharge



Dry Weather Flow



Illicit Discharge or Natural Foam?

MCM 4: Construction Site Stormwater Runoff Control

Town of Brunswick is considered a "Traditional Land Use Control MS4" which refers to a Municipal Separate Storm Sewer System (MS4) owned by a municipality that also has the authority to enforce land use controls, such as zoning and subdivision regulations, to manage stormwater pollution. Therefore, the Town has enacted the local Stormwater Management Law No. 5 of 2007 ([Link to: Local Law No. 5 2007](#))

The Law, establishes a procedure to ensure that pollutants from construction activities requiring coverage under the SPDES General Permit for Stormwater Discharges from Construction Activity (any activity disturbing one acre or more of land or less than one acre if part of a larger common plan of development or sale) do not enter the Town stormwater drainage system. This construction and post-construction runoff control mechanism is used to make sure that the Town of Brunswick Stormwater Management Officer (SWO) or Town Engineer (TDE) has an opportunity to review all Stormwater Pollution Prevention Plans (SWPPPs) that could have an impact on the Town's stormwater drainage system. *See Appendix page C26: Stormwater Management Law No. 5 of 2007 Construction Site and Post- Construction Stormwater Runoff Control – Site Plan Review Procedure.*

Key Goals

The goal for MCM 4 is to ensure that all construction projects requiring a NYS SPDES permit in the Town of Brunswick or that have stormwater drainage into the Town of Brunswick storm sewer system, have proper plans, measures, and inspections in place to minimize erosion and contain all sediment onsite during construction.

Activities/Practices

For construction projects that occur within the Town of Brunswick that require coverage under the SPDES Permit, the SWPPP is reviewed by the SWO or TDE for acceptance prior to submitting a Notice of Intent (NOI) to the DEC for SPDES permit coverage. The SWO, or a qualified inspector hired by the project developer (if a private firm is managing the project), conducts and records weekly site inspections as required by the SPDES permit. *See Appendix page C22: Town of Brunswick Municipal Separate Storm Sewer Systems (MS4) Town of Brunswick Construction Projects- Statement of Policy.*

The SPDES permit for Construction Activity requires that all developers, contractors, and subcontractors identify at least one trained individual from their company that is responsible for SWPPP implementation and is on site daily when there is soil disturbance activity and has the required "NYS DEC Endorsed: 4-Hour Contractor Training in Erosion and Sediment Control" at least once every three years. There is regional training available by Soil and Water Conservation Districts which provided the NYS DEC Endorsed: 4-Hour Training at various times of the year. The Town provides additional training to Town personnel (and municipal employees when requested) on Stormwater Pollution Prevention for Construction Sites.

Town of Brunswick has developed and maintains an inventory of inactive and active construction sites within the boundaries of the Town or site having direct impact to the Town's stormwater drainage system as identified by the DEC NOI inventory <https://extapps.dec.ny.gov/fs/projects/constructionstormwater/NOISpreadsheets>. Active Sites are listed in appendix and on Web Map.

*Inspections records can be reviewed at the Town of Brunswick Building Department

Contact For Construction Stormwater Activity Complaints

Email: stormwater@townofbrunswickny.gov

Further Course of Action

- Work with designers, developers, and contractors, through all the stages of development (planning, construction, completed development) to ensure that construction sites do not contribute pollutants to our MS4.
- The Stormwater Management Officer maintains, and updates, when necessary, a document for tracking SWPPP reviews, approvals, and inspections.
- Develop and implement a yearly tracking system in our GIS program allow better documentation

Some Construction Site Stormwater Runoff Control Measures



Hydroseeded Slope Stabilization



Silt Fence



Hydroseeding Stormwater Pond Embankment

MCM 5: Post-Construction Stormwater Management

Post-construction stormwater management practices are those constructs, devices, features, practices, etc. that remain as a permanent part of a site after all construction activities have been completed. They can include a combination of structural and non-structural practices that are designed according to the standards from the *NYS Stormwater Design Manual* to reduce the discharge of pollutants to the maximum extent practicable (MEP).

Key Goals

The goals for MCM 5 are: to ensure that all post-construction stormwater practices within the Town of Brunswick are functioning well; to increase the awareness and utilization of Green Infrastructure practices on Town owned construction, renovation and retrofit projects; and to encourage the utilization of Green Infrastructure techniques for both public and private development and redevelopment projects.

Activities/Practices

With guidance from the Town Planning Board, SMO, TDE and Building Department, The Town of Brunswick encourages all development and redevelopment plans to incorporate the principles of Low Impact Development (LID), Better Site Design (BSD), and Green Infrastructure (GI) practices whenever practical. These are practices that preserve or mimic natural processes, and can include natural resource protection, maintaining natural buffers to protect streams and wetlands, the reduction of impervious areas, installing vegetated swales, bioretention areas, rain gardens, green roofs, porous pavement, and other such practices.

The Town of Brunswick maintains an enforcement program to ensure proper operation and maintenance of postconstruction SMPs for new or redeveloped sites. This MCM is designed to promote the long-term performance of post-construction SMPs in removing pollutants from stormwater runoff.

Performance Guarantees

In order to ensure the full and faithful completion of all land development activities related to compliance with all conditions set forth by the Town of Brunswick in its approval of the stormwater pollution prevention plan, the Town of Brunswick may require the applicant or developer to provide financial sureties prior to construction. These financial sureties may include, a performance bond, cash escrow, or irrevocable letter of credit from an appropriate financial or surety institution which guarantees satisfactory completion of the project and names the Town of Brunswick as the beneficiary. The security shall be in an amount to be determined by the Town of Brunswick based on submission of final design plans, with reference to actual construction and landscaping costs. The performance guarantee shall remain in force until the surety is released from liability by the Town of Brunswick, provided that such period shall not be less than one year from the date of final acceptance or such other certification that the facility(ies) have been constructed in accordance with the approved plans and specifications and that a one-year inspection has been conducted and the facilities have been found to be acceptable to the Town of Brunswick. Per annum interest on cash escrow deposits shall be reinvested in the account until the surety is released from liability.

Maintenance Guarantee

Where stormwater management and erosion and sediment control facilities are to be operated and maintained by the developer or by a corporation that owns or manages a commercial or industrial facility, the developer, prior to construction, may be required to provide the Town of Brunswick with financial sureties. These financial

sureties may include, an irrevocable letter of credit renewed annually from an approved financial institution or surety to ensure proper operation and maintenance of all stormwater management and erosion control facilities both during and after construction and until the facilities are removed from operation. If the developer or landowner fails to properly operate and maintain stormwater management and erosion and sediment control facilities, the Town of Brunswick may draw upon the account to cover the costs of proper operation and maintenance, including engineering and inspection costs.

Recordkeeping

The Town of Brunswick may require entities subject to this chapter to maintain records demonstrating compliance with this chapter.

Enforcement

Any development activity that is commenced without prior approval of a SWPPP shall be deemed a public nuisance and may be restrained by injunction or otherwise abated in a manner provided by law. Any violator may be required to restore land to its undisturbed condition Plan approval and/or a development permit or a building permit issued may be suspended or revoked by the Town after written notice is given to the owner or developer for any of the following reasons:

- Violation(s) of the conditions of the SWPPP
- Construction not in accordance with approved plans
- Charges in any circumstances which were the basis for the granting of a waiver or variance
- Noncompliance with a correction notice in relation to the construction of control practices or management facilities

The Town may withhold a certificate of occupancy on the basis of failure to meet any substantial component of this chapter or to submit as-built plans, when required, at the completion of the project. If there is any damage due to a violation of this chapter or if any soil, liquid or other material is caused to be deposited upon or to roll, flow or wash upon any public property, private property, watercourse or right-of-way in violation of this chapter, the person, firm, partnership, corporation, or other party responsible shall be notified and shall cause the same to be removed from such property or way within 36 hours of notice. In the event of an immediate danger to the public health or safety, notice shall be given by the most expeditious means, and the violation shall be remedied immediately. In the event it is not so remedied, the Town shall cause such remedy as necessary, and the cost of such by the Town shall be paid to the Town by the party who failed to remedy the situation and shall be a debt owed to the Town above and beyond the approved performance guarantee. The Code Enforcement Officer shall have the authority to issue appearance tickets when the provisions of this Code are deemed to be in violation.

Inventory The Town maintains an inventory of all post-construction SMPs installed after March 10, 2003. Sites developed prior to 2003 may also be listed. Please see Appendix E of Post Construction Management Sites. As new sites are constructed or new SMPs discovered, they will be added to the Town's inventory. This inventory will be reviewed and updated annually as necessary. The inventory will include:

- Street address or tax parcel
- Type
- Receiving water body name and class
- Date of installation
- Ownership
- Responsible party for maintenance
- Contact information for party responsible for maintenance

- Location of documentation depicting O&M requirements and legal agreements for post-construction SMP
- Frequency for inspection of post-construction SMP, as specified in the New York State Department of Environmental Conservation Maintenance Guidance: Stormwater Management Practices, March 31, 2017 (NYS DEC Maintenance Guidance 2017) or as specified in the O&M plan contained in the approved SWPPP (Part VII.D.6.)
- Reason for installation (e.g., new development, redevelopment, retrofit, flood control), if known
- Date of last inspection
- Inspection results
- Any corrective actions identified and completed

Inspection of Post-Construction SMPs

The Town will inspect post-constructions SMPs within the Town at least annually. Inspectors will be trained as necessary. Changes to the Town's inspection protocol may result in additional staff training. The Town will perform all necessary maintenance and/or repair work as necessary on all of the SMPs which it owns. The Town post constructions SMPs inspections will be documented using a post-construction SMP Inspection Checklist – See NYS DEC Stormwater tool box for the appropriate inspection form. Inspections will be Level 1 inspections from NYS DEC Maintenance Guidance 2017. Level 1 inspections may be performed by: the property owners, property managers, HOA representatives, or municipal maintenance staff, interns or volunteers. A more in-depth Level 2 inspections may be performed by trained municipal staff while Level 3 inspections are performed by qualified professionals

Provisions for follow-up actions

Should inspections of post-construction SMPs identify issues that need correction, the Town will notify the party responsible for the maintenance and repair of the post-construction SMP within 30 days. The Town's Code Enforcement Officers will be responsible for enforcing all corrective actions within 60 days of notification of the site owner.

Further Course of Action

- Continue to inspect and monitor post-construction practices.
- Incorporate Green Infrastructure practices and tree plantings into all applicable Town of Brunswick facility construction, reconstruction, renovation, and retrofit projects encourage others to do the same.
- Continue to use the Town GIS program to conduct inspections and document SMP.
- Require private entities to perform inspection and conduct corrective actions per the adopted SWPPP and report those to the Town.

Sample Green Infrastructure Practices



Rain Garden



Permeable Pavers



Bioretention Strip



Tree Pit

MCM 6: Pollution Prevention/Good Housekeeping for Municipal Operations

Municipal facilities and operations can generate and release many pollutants into the stormwater drainage system. This minimum control measure addresses policies and practices that Town of Brunswick has taken to reduce the generation and minimize the impact of these potential pollutants.

Key Goals

The goal of MCM 6 is to ensure, through the use of laws, resolutions, training, policies, and procedures, that the Town reduces pollutants generated “to the maximum extent practicable” through the use of best management practices (BMPs) in carrying out the day-to-day activities of providing services to the people of Town of Brunswick.

Activities/Practices

The Town of Brunswick has one Town Office Complex which includes the Town Offices, Highway Garage and Fueling Station, Salt Shed, Recycling Center, a Community Facility with a Dog Park, three athletic field complexes with concession stands and bathroom facilities, 160 acres of parkland, Water Pump Stations, Sewer Lift Stations and a closed landfill. All parks and facilities are located within the Town of Brunswick. All of these facilities and parks are maintained by staff from the Towns Highway Department and Water and Sewer Department, along with staff assigned to these buildings.

Town of Brunswick Facilities

1. Town Office Complex, 336 Town Office Road
2. Keyes Lane Community Center, 18 Keyes Lane
3. Community Trail and Parkland, 18 Keyes Lane
4. Memorial Park, Old Brunswick Rd
5. Town Beach Complex, 573 North Lake Ave
6. Soccer Complex, 3975 NY2
7. Baseball Complex, 4165 NY2
8. Little League Complex, 819 Hoosick Rd
9. North Lake Water Pump Station, 573 North Lake Ave
10. Cropseyville Water Pump Station, NY2 Cropseyville
11. Sewer 6 Lift Station 784 Hoosick Rd
12. Walmart Lift Station 133 McChesney Ave
13. Highland Creek Lift Station, 1 Newbury Drive
14. Brunswick Meadows Lift Station, Brunswick Meadows Way
15. Close Landfill, Old Seik Road

The majority of the facilities are located in the Quackenkill and Poestenkill water sheds with the remaining facilities draining either to the Hudson Estuary or Upper Hudson Watershed. High Priority Town Facilities include the Town Office Complex, which includes the Town recycling facility, vehicle repair shops, salt storage and fueling stations. The Water Pump Station are also high priority because of the chemical storage. All other facilities and parks are low priority. Classification will be assessed and changed as needed or when new facilities are constructed.

Facility Assessment

1. High priority facilities will have a site specific SWMP. This SWMP will have:
 - a. A Stormwater Pollution Prevention Team
 - b. A General Site Description
 - c. Summary of potential pollutant sources
 - d. Records of Spills and Releases
 - e. A site map
 - f. Documentation of BMPs
 - g. Site assessment records
 - h. Wet Weather Visual Monitoring Records
2. Low priority sites do not need a site specific SWPPP or wet weather monitoring
 - a. Every five years these sites need a comprehensive site assessment

Best Management Practices for Municipal Facilities and Operations

1. Training

- a. Trainings will be completed for all staff as necessary
- b. Trainings will be updated annually or as required
- c. Records of all trainings will be retained

2. Minimize Exposures

Exposure of materials to rain, snow, snowmelt, and runoff must be minimized wherever possible, unless not technologically possible or not economically practicable and achievable in light of best industry practices. This also pertains to areas used for loading and unloading, storage, disposal, cleaning, maintenance, and fueling operations, with the following BMPs

- a. Locate materials and activities inside or protect them with storm resistant coverings
- b. Use grading, berming, or curbing to prevent runoff of contaminated flows and divert run-on away from these areas
- c. Locate materials, equipment, and activities so leaks and spills are contained in existing containment and diversion systems
- d. Clean up spills and leaks promptly using dry methods (e.g., absorbents) to prevent the discharge of pollutants
- e. Store leaky vehicles and equipment indoors or, if stored outdoors, use drip pans and absorbents
- f. Use spill/overflow protection equipment
- g. Perform all vehicle and/or equipment cleaning operations indoors, under cover, or in bermed areas that prevent runoff and also captures any overspray
- h. Drain fluids, indoors or under cover, from equipment and vehicles that will be decommissioned, and, for any equipment and vehicles that will remain unused for extended periods of time, inspect at least monthly for leaks
- i. Minimize exposure of chemicals by replacing with a less toxic alternative (e.g., use non-hazardous cleaners)
- j. All Town vehicles are washed inside where the waste water will be collected into the Town stormwater containment area water and oil separator and discharge appropriately

3. Follow a Preventative Maintenance Program

- a. Implement a preventative maintenance program that includes routine inspection, testing, maintenance, and repair of all fueling areas, vehicles and equipment and systems to prevent leaks, spills and other releases
- b. Performing inspections and preventive maintenance of stormwater drainage, source controls, treatment systems, and plant equipment and systems
- c. Maintaining non-structural BMPs (e.g., keep spill response supplies available, personnel appropriately trained, containment measures, covering fuel areas)
- d. Ensure vehicle wash water is not discharged to the surface waters of the State. Wash equipment/vehicles in a designated and/or covered area where wash water is collected to be recycled or discharged to the sanitary sewer

4. Spill Prevention and Response

Procedures Minimize the potential for leaks, spills and other releases that may be exposed to stormwater and develop plans for effective response to such spills if or when they occur. At a minimum, the Town of Brunswick must:

- a. Store materials in appropriate containers
- b. Label containers that could be susceptible to spillage or leakage to encourage proper handling and facilitate rapid response if spills or leaks occur (e.g., “Used Oil,” “Spent Solvents,” “Fertilizers and Pesticides”)
- c. Implement procedures for material storage and handling, including the use of secondary containment and barriers between material storage and traffic areas, or a similarly effective means designed to prevent the discharge of pollutants from these areas
- d. Develop procedures for stopping, containing, and cleaning up leaks, spills, and other releases. As appropriate, execute such procedures as soon as possible
- e. Keep spill kits on-site, located near areas where spills may occur or where a rapid response can be made
- f. Develop procedures for notification of the appropriate facility personnel, emergency response agencies, and regulatory agencies when a leak, spill, or other release occurs. Any spills must be reported in accordance with 6 NYCRR 750-2.7
- g. Following any spill or release, the Town of Brunswick must evaluate the adequacy of the BMPs identified in the municipal facility specific SWPPP. If the BMPs are inadequate, the SWPPP must be updated to identify new BMPs that will prevent reoccurrence and improve the emergency response to such releases

5. Erosion and Sediment Controls

Stabilize exposed areas and control runoff using structural and/or non-structural controls to minimize onsite erosion and sedimentation. The Town will consider if structural, vegetative or other BMPs are needed to limit erosion

6. Manage Vegetated Areas and Open Spaces on Municipal Property

The Town of Brunswick will maintain vegetated areas on Town property and right of ways

- a. Specify proper use, storage, and disposal of pesticides, herbicides, and fertilizers including

minimizing the use of these products and using only in accordance manufacturer's instruction

- b. Use lawn maintenance and landscaping practices that are protective of water quality. Protective practices include: reduced mowing frequencies; proper disposal of lawn clippings; and use of alternative landscaping materials (e.g., drought resistant planting)
- c. Place pet waste disposal containers and signage concerning the proper collection and disposal of pet waste at all parks and open space where pets are permitted
- d. Address waterfowl congregation areas where needed to reduce waterfowl droppings from entering the MS4

7. Salt Storage Piles

The Town of Brunswick uses salt for deicing surfaces. This pile is stored in a barn and action is taken when building this pile to minimize exposure time to reduce erosion.

8. Waste, Garbage, and Floatable Debris

The Town will keep all dumpster lids closed when not in use. The Town will keep all Town properties free of waste, garbage and debris. The Town of Brunswick has trucks which collect residential leaf, brush and large appliance recycling within the Town of Brunswick. Residential brush, leaves, lawn clippings, and other biodegradable materials are dumped at the Town's brush staging area or at the closed landfill. This material is eventually ground into mulch.

Municipal Operations & Maintenance

Town of Brunswick municipal operations are: street and bridge maintenance; winter road maintenance; stormwater infrastructure maintenance; catch basins, open space maintenance; solid waste management; new construction and land disturbances; street sweeping; leaf collection; right-of-way maintenance; drinking water and waste water treatment.

1. Training

- a. All new hires in the Highway or Sewer and Water Department will be trained in municipal operations at the time of their hiring. All other staff will be trained at a minimum of every five years, or more frequently if necessary. Failure to follow municipal procedures may result in remedial or corrective action training. Changes to municipal procedures may trigger additional training. All training records will be documented and retained.

2. Corrective Action

- a. The Highway Department will implement corrective actions according to the following schedule and, after implementation, ensure the operations are in compliance with the terms and conditions of this SPDES general permit:
 - i. Within twenty-four (24) hours of discovery for situations that have a reasonable likelihood of adversely affecting human health or the environment
 - ii Initiated within seven (7) days of inspection and completed within thirty (30) days of inspection for situations that do not have a reasonable likelihood of adversely affecting human health or the environment
 - iii. For corrective actions that require special funding or construction that will take longer than thirty (30) days to complete, a schedule must be prepared that specifies interim milestones

that will ensure compliance in the shortest reasonable time

3. Catch Basin Inspection and Maintenance

a. Inspections

- i. Inspection will be conducted at a frequency of 25% per year. Inspection information collected will include the date, locations, catch basin size, approximate level of trash, sediment, and/or debris captured at the time of clean-out
- ii. Areas near construction activities should be inspected more frequently
- iii. Catch basins within residential, commercial and industrial areas should be inspected frequently
- iv. Catch basins with recurring or history of issues should be inspected frequently
- v. Catch basins with confirmed citizen complaints on three or more separate occasions within the past twelve months

b. Cleaning

- i. Cleaning and inspections may occur at the same time
- ii. Within six (6) months after the catch basin inspection, catch basins which had trash, sediment, and/or debris exceeding 50% of the depth of the sump as a result of a catch basin inspection must be cleaned out
- iii. Within one (1) year after the catch basin inspection, catch basins which had trash, sediment, and/or debris at less than 50% of the depth of the sump as a result of a catch basin inspection must be cleaned out
- iv. Town staff is not required to clean out catch basins if the catch basins are operating properly, if there is no trash, sediment, and/or debris in the catch basin
- v. Solids, trash or other debris must be removed
- vi. The most crucial part of cleaning a catch basin is cleaning or “jetting” the connections to other catch basins. These connections are part of the stormwater drainage system. Catch basins may have anywhere from one to four connections. Some of these connections may be a “cross over” which crosses over to the other side of the street. When “jetting” a stormwater sewer line, sediment and water will be collected by the Town’s vacuum truck
- vii. Properly manage (handling and disposal) materials removed from catch basins during clean out so that: water removed during the catch basin cleaning process will not reenter the MS4 or surface waters of the State. Material removed from catch basins is disposed of in accordance with any applicable environmental laws and regulations; and material removed during the catch basin cleaning process will not reenter the MS4 or surface waters of the State

c. Maintenance and repair

- i. Catch basins or drain inserts found to be collapsing or in need up repair will be replaced or repaired as soon as practical

4. Roads, Bridges, Parking Lots, and Right of Way Maintenance

a. Sweeping

- i. The Town of Brunswick has a street sweeping program to ensure that all roads, bridges, parking lots and right of ways owned by the Town are swept. All roads, bridges, parking lots, and right of ways must be swept and/or cleaned at least once every five (5) years in the spring (following winter activities such as salting). This requirement is not applicable to uncurbed roads with no catch basins. Annually, from April 1 through October 31, roads in business and commercial areas must be swept. The Town will prioritize sweeping areas of active construction or other areas likely to have sediment eroding. The Town will also prioritize sweeping in the commercial district as well as along the Town’s waterways. Areas in which the catch basins are collecting a significant amount of materials will also be swept more frequently

- b. The Town must stage road operations and maintenance activity (e.g. patching potholes) to reduce the potential discharge of pollutants to the MS4 or surface waters of the State. The Town will routinely calibrate equipment to control salt/sand application rates
- c. Restrict the use of herbicides/pesticide application to roadside vegetation as well as at Town facilities and parks
- d. Contain pollutants associated with bridge maintenance activities (e.g., paint chips, dust, cleaning products, other debris) and ensure they don't enter the surface waters of the State.

Further Course of Action

- Continue to explore road de-icing alternatives to salt, addressing the storage, handling, mixing, calibration of spreaders, and the application of road deicing materials. The Town will continue to research environmentally safer, but equally effective, products and procedures to reduce the usage of salt
- Expand efforts to increase the awareness, policies, and utilization of green procurement to ensure that all departments are using the most effective, cost effective, safest (both for personnel and the environment) products that are readily available.
- Continue proper maintenance practices to reduce pollutants to the maximum extent practicable, leading to cleaner waterbodies that fully support their designated uses for us all to enjoy.
- Continue to look for funding opportunities to assess, design, and replace road stream crossings to enhance geomorphic compatibility and reduce erosion.
- Develop effect inspection reporting for all Town own facilities

Some Pollution Prevention/Good Housekeeping Practices for Municipal Operations



Catch Basin Cleaning



Vacuum Streetsweeper



Salt Storage Shed

Irrelevant Sections

The SPDES general permit covers the entirety of the NYS MS4 system, and as such there are some sections in the permit that are not applicable for Town of Brunswick, as a Traditional Land Use Control. Part IV.A.B of the permit requires the MS4 Operator (in this case Town of Brunswick) to identify which sections (Parts VI – IX) are not applicable and provide justification for why these sections are not relevant.

- The entirety of Part VIII Enhanced Requirements for Impaired Waters does not apply because Town of Brunswick does not currently contain any applicable impaired waters per Appendix C.
- The entirety of Part IX Watershed Improvement Strategy Requirements for TMDL Implementation does not apply because Town of Brunswick does not currently have any TMDLs.

This document is constantly being updated with new information. In the coming months/years this document will continue to undergo changes as it is updated to be in compliance with the new permit.

Updated Sections

The following chart identifies the updates made to the SWMP plan in accordance with the July 3rd deadline.

Reference	Deliverable	Action
IV.A.2.	Staffing plan/Organizational chart	This has been updated in the SWMP to reflect the most up to date structure of the Towns MS4 organization.
IV.B.1	Stormwater Program Coordinator name, title, and contact information	The SWMP is coordinated by Town of Brunswick Stormwater Management Officer in collaboration with various Town departments (see org. chart).
IV.B.2.a.	The current SWMP Plan, and documentation associated with the implementation of the SWMP Plan, available during normal business hours to the MS4 Operator's management and staff responsible for implementation as well as the Department and United States Environmental Protection Agency (USEPA) staff	The most up to date plan is available online at https://brunswickny.gov/page.php?p=50
IV.B.2.b.	The current SWMP Plan available for public inspection during normal business hours at a location that is accessible to the	The most up to date plan is available online at https://brunswickny.gov/page.php?p=50 .

public or on a public website

IV.D.	Comprehensive system mapping	The 6 month mapping requirements have been met.
IV.F.1.	Enforcement response plan (ERP)	The Town has prepared an Enforcement Response Plan that is based on local law and complies with the permit requirements. The ERP can be found in the Appendix.
VII.A.1.e.	Information related to the prevention of illicit discharges has been made available	Information about the prevention of illicit discharge is available here
VII.B.1.c.	Name/Title and contact information of local point of contact to receive and respond to public concerns regarding stormwater management and compliance with permit requirements	The plan identifies the Town of Brunswick Stormwater hotline as the point of contact for all public comments and concerns.
VII.C.1.a.i.	Email or phone number used for the public to report illicit discharges	The plan includes the email address and phone number for the public to report illicit discharge.
VII.D.2.a.	Email or phone number used for the public to report complaints related to construction stormwater activity	The plan identifies an email address for people to report complaints related to construction stormwater activity.
VII.D.2.b.	Reports of construction site complaints	The plan identifies provisions for tracking complaints of construction site issues.
VII.D.4.a.	Inventory of construction sites	An inventory of construction sites has been created and will be maintained as new sites become applicable.
VII.F.3.d.i.	Roads, bridges, parking lots, and right of way sweeping procedures	The plan describes the Towns sweeping schedule and tracking.