



**Village of Southampton  
Stormwater Management Program Plan  
(SWMPP)**

**As Required By The  
NEW YORK STATE  
DEPARTMENT OF ENVIRONMENTAL CONSERVATION  
SPDES GENERAL PERMIT FOR STORMWATER DISCHARGES  
FROM  
MUNICIPAL SEPARATE STORM SEWER SYSTEMS  
(GP-0-24-001)**

**Last Revised September 2024**

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## **1.0 INTRODUCTION**

### **1.1 NYSDEC General MS4 SPDES Permit GP-0-24-001: Village of Southampton Coverage**

The Village of Southampton (VOS) has obtained coverage under the New York State Pollution Discharge Elimination System (SPDES) General Permit for Stormwater Discharges from Municipal Separate Storm Sewer Systems (MS4s), GP-0-24-001 as mandated by the NYS DEC. The Village's NYS DEC MS4 permit number is NYR-20 A456. The aim of the NYSDEC SPDES MS4 General Permit is to prevent the discharge of pollutants from municipal separate storm sewer system outfalls to surface waters of the United States in accordance with the requirements of federal stormwater regulations under the Clean Water Act. Please see **Appendix A** for the Village's 2024 Notice of Intent and July 9, 2024 NOI Acknowledgement Letter from the NYS DEC.

### **1.2 VOS MS4 Stormwater Management Program Plan: Measurable Goals**

As required, the Village has developed an MS4 Stormwater Management Program Plan (SWMPP). The VOS SWMPP has been developed to ensure reduction in the discharge of pollutants from the Village's storm sewer system as required by the SPDES General Permit. The SWMPP describes the actions that are ongoing and that are planned to reduce the impacts of the Village's MS4 storm sewer system outfall discharges on surface waterbodies. The VOS SWMPP includes measurable goals that reflect the needs and characteristics of a small Village and the areas served by its storm sewer system. The Village has achieved the full implementation milestones required by prior NYS DEC MS4 permit terms. Incremental goals are no longer necessary for the satisfaction of MS4 program development requirements. VOS SWMPP measurable goals reflect ongoing SWMPP implementation and are quantified through the data collection that results from documentation of procedures and activities on a year-to-year basis.

### **1.3 Location**

Southampton Village is located 95 miles from New York City in southeastern Suffolk County within the Town of Southampton. According to the United States Census Bureau, as of 2010 the population was approximately 3,100. The Village has a total area of 6.75 square miles, of which 6.4 square miles is land and 0.81 square miles is water. The Village covers less than 4% of the total Town land area. Surrounding towns include Brookhaven to the west, East Hampton to the east, and Riverhead, Southold, and Shelter Island to the north, across the Peconic Bay. Nearby communities include Hampton Bays (seven miles to the west), Bridgehampton (six miles east), East Hampton (twelve miles east), and Sag Harbor (eleven miles north and east).

### **1.4 Surrounding Land Use**

Land uses surrounding the Village of Southampton are primarily low-density residential areas. To the north and east of the Village there are scattered farmlands in addition to housing. West of the Village is the Shinnecock Indian Nation. Uses on the north side of the Village also include a broader mix of activities including commercial uses located in the vicinity of County Road 39 and the Long Island Railroad tracks. The Mariner Drive industrial park and numerous commercial and residential lots fall within both the Town and the Village.

### 1.5 Recreational Areas and Natural Resources

Recreational and open space areas include a mix of natural resource areas, active farmland, parks, and a variety of recreation facilities. The Village has approximately seven miles of oceanfront. The Village is a prime resort community due to the quality and scale of its coastal beaches. As a result, the Village population swells seasonally, especially during the summer months. Other natural areas important to the Village include Heady and Taylor Creeks (which are tributary to Shinnecock Bay), Lake Agawam, and a series of freshwater ponds near the south shore.

### 1.6 Water Quality Impairments

The NYSDEC 2024 Section 303(d) List of Impaired Waters includes surface waterbodies within the Village of Southampton and characterizes their impairments as shown in the **Table 1** below.

**Table 1: Water Quality Impairments**

Waterbody	Pollutant(s)	Source(s)
Lake Agawam	Phosphorus	Onsite WTS, Urban Runoff
Shinnecock Bay and Inlet	Nitrogen	Onsite WTS, Urban Runoff
Heady and Taylor Creeks	Pathogens	Unknown

The Village’s MS4 system does not have any outfalls to Shinnecock Bay. The VOS SWMPP prioritizes attention to Lake Agawam and Heady and Taylor Creeks due to nutrients and pathogens impairments. In addition, the stormwater program addresses other pollutants such as toxic chemicals, sediment, and debris.

### 1.7 VOS MS4 Stormwater Management Program Plan: Priorities

The VOS SWMPP addresses the geographic areas that drain to Village storm sewer system outfalls that discharge to surface waterbodies. To determine the priority areas, pollutants, and audiences of concern to be addressed by the VOS SWMPP, the Village considered the following information:

- Water quality information –The NYS DEC 303(d) List identifies impaired waters and the sources of pollutants to them. Impaired waters are of high priority (Lake Agawam and Heady and Taylor Creeks).
- Size of Contributing Area – A higher priority will be given to outfalls with large contributing areas.
- Contributing Area Land use – A high priority will be provided higher intensity land uses, including the downtown/commercial areas, higher density residential areas and any hot spot uses within the outfall drainage contributing area.
- Location of areas with aged septic systems – A high priority will be given to the downtown area (where there are a number of aging septic systems predating Health Dept. standards) and older areas of the community with aged septic systems.
- Density of outfalls – A high priority designation will correlate to areas with multiple

outfalls discharging to a waterbody.

- Areas that drain to shellfishing and bathing beach surface waters - A high priority designation will correlate to shellfish growing waters or public beaches. These areas will be designated as high priority for public health reasons.

**Table 2** provides a listing of the Village’s outfalls, including information on the drainage contributing area to each outfall and land uses within the contributing area. As evidenced by **Table 2**, outfalls to Lake Agawam have the largest contributing areas and/or land uses of highest intensity. The contributing areas to Lake Agawam include the downtown business district and neighborhoods of medium density residential lots that include aged sanitary systems that do not meet current Suffolk County Health Dept. density standards. Heady and Taylor Creeks are listed on the NYSDEC 2018 Section 303(d) List of Impaired Waters. Therefore, the VOS SWMPP prioritizes attention to Lake Agawam and Heady and Taylor Creeks drainage areas due to nutrients and pathogens impairments and drainage area characteristics as noted above. These drainage contributing areas are the priority areas of concern for all Minimum Control Measures. Please see **Appendix D** for the Village’s storm sewer drainage area mapping.

**Table 2: Village Outfall Characteristics**

<u>Outfall Number</u>	<u>Waterbody/Discharge Location</u>	<u>Outfall Location</u>	<u>Drainage Contributing Area (Acres)</u>	<u>Land Use within Contributing Area</u>
O-1	Heady Creek North	South side of East Gate Road, west of the intersection of East Gate Road and Hill Street	39.41	Low density residential
O-2	Heady Creek Northeast	South of the terminus of Heady Creek Lane (northeastern finger of Heady Creek)	4.75	Low density residential
O-3	Taylor Creek	South side of Great Plains Road, between Captains Neck Lane and Halsey Neck Lane	30.28	Low density residential
O-4	Halsey Neck Pond North	South side of Meadowmere Lane (mid-block)	129.97	Low density residential, agricultural
O-5	Halsey Neck Pond East	Northwest corner of Meadow Lane and Cooper’s Neck Lane	9.39	Low density residential

<u>Outfall Number</u>	<u>Waterbody/Discharge Location</u>	<u>Outfall Location</u>	<u>Drainage Contributing Area (Acres)</u>	<u>Land Use within Contributing Area</u>
O-6	Halsey Neck Pond East	Northwest corner of Meadow Lane and Cooper's Neck Lane		
O-7	Lake Agawam Southeast	Southeast side of Lake Agawam at the bend in Gin Lane	22.75	Low density residential
O-8	Lake Agawam Northeast	Southeastern corner of Agawam Park	32.23	Downtown/commercial corridor, medium density residential, institutional
O-9	Lake Agawam Northwest	Southwestern corner of Agawam Park	439.18	Downtown/commercial corridor, multifamily, medium to low density residential, institutional
O-10	Wickapogue Pond North	South side of Wickapogue Road, east of Narrow Lane	53.59	Low density residential
O-11	Philips Pond North	South side of Wickapogue Road, east of Downs Path	38.51	Low density residential, agricultural

## 1.8 Water Quality Improvements

### Lake Agawam

The Village of Southampton has been focused on the remediation and protection of Lake Agawam for a number of years and has been diligent in obtaining grant funding to conduct studies and to implement Lake Agawam water quality improvement projects. The Village and its partners have been engaged in a number of initiatives to address Lake Agawam water quality impairments for over 10 years. Such efforts include, for example:

- A. The 2009 Comprehensive Management Plan for Lake Agawam, which provides an inventory of watershed and lake conditions as well as recommendations and an action plan for shoreline, stormwater aeration and water quality monitoring and research. In 2020, the Village adopted an update to the Plan, including a number of new action items. (See reports posted to Village website: <http://www.southamptonvillage.org/251/Environmental-Committee>).
- B. The Village has completed several stormwater remediation projects in the watershed over the past ten years consisting primarily of new and upgraded drainage systems to

capture and retain first flush stormwater before it can reach the Lake. Several recent and planned projects include:

- Lake Agawam Northeast Outfall: A significant improvement project was completed in 2018-2019 to add 19 leaching pools and additional curb inlets along Jobs Lane and 14 additional leaching pools to the O'Connell Drive parking lot, significantly reducing pollutant loads from the prior direct discharges to the northeastern outfall to Lake Agawam.
- Gin Lane Stormwater Drainage Improvements: The Gin Lane project is a drainage improvement initiative planned on Gin Lane at the south end of Lake Agawam. The project includes the installation of bio-infiltration (rain garden measuring approx. 1,967 square feet), bio-retention systems, and installation of 13 leaching pools to capture and treat flows from the drainage area (Outfall O-7). The Gin Lane project has grant awards from Suffolk County Water Quality Protection and Restoration Program & New York State Department of Environmental Conservation, Water Quality Improvement Program.

#### **Heady Creek:**

The Village and Town of Southampton have implemented drainage improvements on Tuckahoe Lane, including the installation additional drainage infrastructure on the west side of Tuckahoe Lane to capture and convey stormwater to a recharge basin located on the west side of Tuckahoe Lane, as well as the installation of additional leaching pools on Tuckahoe Lane south of the recharge basin, which significantly reduced the stormwater contributing area to Outfall #1 (Heady Creek).

#### **On-Site Wastewater Treatment Systems and Implementation of a Sanitary Sewer District:**

The Village has not had any reported septic systems failures resulting in discharges to the Village MS4 system to surface waters. Village initiatives to address the water quality impairments associated with on-site wastewater treatment systems include:

- A. The Village has taken a number of steps to investigate and facilitate creation of a sewer district. The Village issued a contract in May 2021 for preparation of a sanitary sewer district map and plan. This is the initial phase of sewer district creation that is to be completed by Feb. 2022. The Initial service district is intended to be the Business District and North Sea Road up to CR 39. Additional phases will also be considered for the School, Town Hall/Hampton Road. Design of the sewage treatment plant, preparation of bid documents, and construction are expected to take 4 years.
- B. The 2017 Lake Agawam Water Quality Study prepared by Christopher Gobler, PhD (SBU, SOMAS), which was undertaken to estimate the effect that sewerage a portion of the Village of Southampton would have on the total nitrogen loads to Lake Agawam and other neighboring water bodies as well as the water quality within these systems.

- C. Encouragement of homeowners by the Village and the Lake Agawam Conservancy to access Suffolk County and Town of Southampton septic system upgrade grants totaling \$40,000. Further information is available at:  
<https://lakeagawam.org/upgrade-your-septic-system/>
- D. Village of Southampton Local Law Chapter 43 Section 17, which requires alternative on-site wastewater treatment systems approved by the Suffolk County Department of Health Services for the following types of projects located within the Lake Agawam area:
- All new residential construction.
  - Any substantial septic system upgrade required by the Suffolk County Department of Health Services or the Village Zoning Board of Appeals pursuant to a wetlands (natural resource) special permit under Article IIIA of the Zoning Code; or
  - Any increase in the number of bedrooms in an existing residence.

**1.9 Stormwater Management Program Plan Administration**

The VOS SWMPP is coordinated by the Village Administrator, Scott Russell, with collaboration with the Department of Public Works, which includes the Building Maintenance Dept., Central Garage, Highway Dept. and Parks Dept.. The Village Attorney assists with local law review and enforcement of the Village Code. Additionally, the Village has retained Nelson Pope Voorhis (NPV) for compliance assistance in connection with the SPDES general permit, per General Consulting Contract, dated September 2024.

**Contact information**

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 Email: [srussell@southamptonvillage.org](mailto:srussell@southamptonvillage.org)

**Table 3: Village MS4 Program Staffing**

Roles and Responsibilities/Associated Minimum Control Measure		Responsible Person(s)	Supporting Staff/Resources
1	Public Education and Outreach	Superintendent of Public Works	Village Clerk and office support staff (website updates), NPV
2	Public Involvement and Participation	Superintendent of Public Works	Village Clerk and office support staff, Village Board of Trustees, NPV
3	Illicit Discharge Detection and Elimination	Superintendent of Public Works	DPW field personnel, Village Fire Dept., Village Code Enforcement, NPV

Roles and Responsibilities/Associated Minimum Control Measure		Responsible Person(s)	Supporting Staff/Resources
4	Construction Site Runoff Control	Senior Building Inspector	Building Inspector, Village Building Department support staff, Village Code Enforcement, NPV
5	Post Construction Stormwater Management	Senior Building Inspector	Building Inspector, Village Building Department support staff, Village Code Enforcement, NPV
6	Pollution Prevention and Good Housekeeping	Superintendent of Public Works	DPW field personnel and office support staff. Village Fire Dept. and Police Dept., NPV

Operational Costs – The Village currently funds personnel from the Department of Public Works, Building Department, Code Enforcement and Village Attorney that work on MS4 Permit requirements through its operating budget. SWPPP review is funded through application fees.

Capital Improvement Costs – Large scale projects such as infrastructure replacement/retrofits are generally paid out of a Capital Improvement Project (CIPs) budget and through grant funding. The Village has had considerable success in securing grant funds for the implementation of drainage improvement projects in critical areas of the Village.

**1.10 Stormwater Management Program Plan Components: Minimum Control Measures**

The NYSDEC SPDES MS4 General Permit requires that the SWMP include specific program components known as Minimum Control Measures (MCMs), including:

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

Specific activities, known as “Best Management Practices” (BMP’s) are required for each Minimum Control Measure, and are provided in the following sections. The Village’s stormwater program is comprised of the six minimum control measures as required by the MS4 General Permit. Documentation and records for each Minimum Control Measure are contained in **Appendices B-F**. The Village has identified the storm sewer system drainage areas that drain through its outfalls to impaired waterbodies within the Village (Lake Agawam and Heady and Taylor Creeks, which are tributary to Shinnecock Bay) as its priority areas of concern for all Minimum Control Measures.

### **1.11 Enforcement Response Plan**

The Village has developed an Enforcement Response Plan (ERP) which describes the action(s) to be taken for violations that the Villages has enacted for illicit discharge, construction, and post-construction (see MCMs 3, 4 and 5). The ERP sets forth a protocol to address repeat and continuing violations through progressively stricter responses (i.e., escalation of enforcement) as needed to achieve compliance with the terms and conditions of the SPDES general permit.

The ERP describes how the Village will use the following types of enforcement responses or combination of responses:

- Verbal warnings
- Written notices
- Citations (and associated fines)
- Stop work orders
- Withholding of plan approvals or other authorizations affecting the ability to discharge to the MS4
- 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

Enforcement responses are based on the type, magnitude, and duration of the violation, effect of the violation on the receiving water, compliance history of the operator, and good faith of the operator in compliance efforts.

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

## **2.0 MCM 1 PUBLIC EDUCATION AND OUTREACH (GP-0-24-001, Pgs. 30-32)**

The Public Education and Outreach control measure requires that the Village implement an ongoing public education and outreach program designed to describe to the general public the impacts of stormwater discharges on waterbodies; pollutants of concern and their sources; and the steps that contributors of these pollutants can take to reduce them. The Village has identified the storm sewer system drainage areas that drain through its outfalls to impaired waterbodies as its priority areas of concern. These waterbodies include Lake Agawam, Heady Creek and Taylor Creek. (Please see **Appendix B** for documents pertaining to MCM 1.)

### **2.1 BMP: Distribution of Educational Materials**

The Village distributes educational brochures and flyers pertaining to stormwater pollutants at Village Hall. The Village will continue this practice. These materials address sources of nutrients and pathogens, other POCs, and actions that members of the community can take to address them. In addition, the Village partners with the Lake Agawam Conservancy through which a variety of educational information is distributed.

In addition, educational materials pertaining to priority POCs are provided on the Village web site on the following pages:

1. <https://www.southamptonvillage.org/150/Building-Department>.
2. <https://www.southamptonvillage.org/154/Public-Works>
3. <https://www.southamptonvillage.org/155/Highway-Department>
4. <https://www.southamptonvillage.org/309/Stormwater-SWPPP>

### **2.2 MCM 1 Measurable Goals (March 2021-March 2022)**

1. Continue to distribute educational materials at Village Hall.
2. Continue to distribute educational materials via postings on the Village website.
3. Distribute printed educational materials beyond Village Hall when possible.
4. Update the educational materials that are offered on the Village web site.

### **3.0 MCM 2 Public Involvement and Participation (GP-0-24-001 pgs. 32-35)**

The Public Involvement and Participation control measure requires the Village to comply with the NYS Open Meetings Law and local public notice requirements and to implement a program that provides opportunities for the public to participate in the stormwater management program. Identification of a stormwater program public contact and provision of the means for the public to provide comments on the annual stormwater program report at a public meeting or on the internet are also required. The Village has identified the storm sewer system drainage areas that drain through its outfalls to impaired waterbodies within the Village as its priority areas of concern. These waterbodies include Lake Agawam and Heady and Taylor Creeks. (Please see **Appendix C** for documents and records pertaining to MCM 2.)

#### **3.1 Local Stormwater Program Contact**

Scott Russell, Village of Southampton Administrator  
Telephone: 631 283 0247 #224  
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#### **3.2 MCM 2 BMP: Annual Report and Public Comments**

The Village discusses the annual MS4 SWMPP report at public Village Board of Trustees meetings that are attended by the public and invites public comments on the report via its web site at: <https://www.southamptonvillage.org/309/Stormwater-SWPPP>

#### **3.3 MCM 2 BMP: Partnerships and Participation**

The Village has an Environmental Committee that acts as an advisory committee to the Village Trustees. The purpose of the committee is to assist the Village in the review of current and potential projects and procedures related to the protection and use of natural environmental resources and general water quality throughout the Village, and to make recommendations to the Village Board. The Environmental Committee oversaw the development of the Lake Agawam 2020 Management Plan, which included public meetings and was adopted by the Village Board in July 2020.

The Village partners with the Lake Agawam Conservancy, which sponsors a variety of participatory events and distributes educational information pertaining to water quality.

**See:** <https://lakeagawam.org/news-and-events/>

#### **3.4 MCM 2 Measurable Goals (March 2021-March 2022)**

1. Continue to support Lake Agawam Conservancy public participation and education endeavors.
2. Prepare the MS4 annual report and provide public notice regarding the availability of the MS4 annual report for public comment.

3. Post the annual report to the Village web site.
4. Submit the MS4 annual report to the DEC by April 1<sup>st</sup> of each year.

#### 4.0 MCM 3 Illicit Discharge Detection and Elimination (GP-0-24-001 pgs. 36-38)

The Illicit Discharge Detection and Elimination control measure requires the Village to implement and enforce a program to detect and eliminate illicit discharges to the municipal separate storm sewer system. The Village has identified Lake Agawam as its priority area for illicit discharge detection due to nutrient and pathogens impairments. The Village uses the NYS DEC publication entitled *Outfall and System Mapping for Illicit Discharge Detection and Elimination in New York* and the US EPA publication entitled *Illicit Discharge Detection and Elimination: A Guidance Manual for Program Development and Technical* to guide its MCM 3 program.

Specific MCM 3 requirements include:

- Adoption and enforcement of a Local Law prohibiting illicit discharges to the storm sewer system.
- Mapping of the storm sewer system, the storm sewer system drainage area, and storm sewer system outfalls to surface waters.
- Monitoring of outfalls for illicit discharges.
- Education of the public regarding the impacts caused by illicit discharges.
- Training of staff regarding detection and elimination of illicit discharges.

Implementation of MCM 3 is overseen by the Superintendent of Public Works, Stephen Phillips Jr. (Please see **Appendix D** for documents and records pertaining to MCM 3.)

#### 4.1 MCM 3 BMP: Local Law & Enforcement

The Village of Southampton used the model illicit discharge local law provided by NYS DEC and adopted Village Code Chapter 92, which prohibits illicit discharges to the storm sewer system. Please see **Appendix D**.

Per § 92-13 of the Village Code, when the Village's Stormwater Management Officer finds that a person has violated a prohibition or failed to meet a requirement pertaining to Chapter 92 of the Village Code pertaining to illicit discharges, he/she may order compliance by written notice of violation to the responsible person. Such notice may require, without limitation:

1. The elimination of illicit connections or discharges;
2. That violating discharges, practices, or operations shall cease and desist;
3. The abatement or remediation of stormwater pollution or contamination hazards and the restoration of any affected property;
4. The performance of monitoring, analyses, and reporting;
5. Payment of a fine; and
6. The implementation of source control or treatment BMPs.

If abatement of a violation and/or restoration of affected property is required, the notice shall set forth a deadline within which such remediation or restoration must be completed. Said

notice shall further advise that, should the violator fail to remediate or restore within the established deadline, the work will be done by a designated governmental agency or a contractor and the expense thereof shall be charged to the violator.

#### **4.2 MCM 3 BMP: Mapping**

The Village maintains maps of its storm sewer system, storm sewer system drainage area, and storm sewer system outfalls as required by the General Permit. Please see **Appendix D** for the Village's MCM 3 mapping.

#### **4.3 MCM 3 BMP: Outfall Monitoring**

The Village follows the Outfall Reconnaissance Inventory (ORI) procedures recommended in Chapter 11 of the US EPA publication entitled *Illicit Discharge Detection and Elimination: A Guidance Manual for Program Development and Technical Assessment* during its monitoring of storm sewer system outfalls for evidence of illicit discharges to surface waters. Those written procedures are a component of this plan. **Please see Appendix D** for the procedures and checklists, and equipment that Village staff use when monitoring outfalls. As required, the Village will provide documentation of ORI inspections to the US EPA by October 29, 2021.

#### **4.4 MCM 3 BMP: Illicit Discharge Elimination**

The Village regularly monitors its storm sewer system inlets and outfalls to surface waters using procedures recommended in the US EPA publication entitled *Illicit Discharge Detection and Elimination: A Guidance Manual for Program Development and Technical Assessment*. Those written procedures are a component of this plan. It is noted that illicit discharges to storm sewer inlets in the Village are extremely rare. When detected, they are immediately addressed through enforcement measures by Village of Southampton Building Department and/or the Suffolk County Department of Health. Equipment to be used for illicit discharge detection and elimination will include the following as necessary: latex gloves, camera, pipe camera, waders, pole, flashlight, sample bottles, labeling tape/labels, measuring tape, permanent marker, and dipper. Laboratory analysis will be conducted by a third party, if necessary.

Please see **Appendix D** for the procedures, documentation, and equipment that Village staff use in the event that an illicit discharge from a storm sewer system outfall becomes suspected or known.

To date, evidence of dry weather flow and/or illicit discharges from outfalls to surface waters has not been suspected or detected. Sampling has not been necessary. In the event that an illicit discharge from an outfall becomes evident or suspected, the sampling, track down and elimination procedures provided in Chapters 12 and 13 of the US EPA publication entitled *Illicit*

*Discharge Detection and Elimination: A Guidance Manual for Program Development and Technical Assessment* will be followed and documented. Those written procedures are a component of this plan. Please see **Appendix D** for the procedures, documentation, and equipment that Village staff will use in the event that an illicit discharge to/from a Village outfall becomes suspected or known.

#### **4.5 MCM 3 BMP: Staff Training**

Village staff with responsibilities relating to drainage and storm sewer system maintenance are regularly trained regarding detection and elimination of non-stormwater discharges to and from the storm sewer system. They are trained regarding the procedures to be followed and the documentation that is to be used. The US EPA publication entitled *Illicit Discharge Detection and Elimination: A Guidance Manual for Program Development and Technical Assessment* is the basis for the on-the-job training provided. In addition, Village staff have received online trainings offered by the Central Massachusetts Regional Stormwater Coalition:

<https://www.centralmastormwater.org/toolbox/pages/2020-idde-workshop-ms4-assistance-grant>

Please see **Appendix D** for the documentation that Village staff use in the event that an illicit discharge to a storm sewer inlet or from an outfall becomes suspected or known.

#### **4.6 MCM 3 BMP: Education of the Public**

The Village distributes educational materials to the public regarding illicit discharges at Village hall and on its web site. See:

1. <https://www.southamptonvillage.org/150/Building-Department>.
2. <https://www.southamptonvillage.org/154/Public-Works>
3. <https://www.southamptonvillage.org/155/Highway-Department>
4. <https://lakeagawam.org/news-and-events/>

#### **4.7 MCM 3 Measurable Goals (March 2021-March 2022)**

1. Complete ORI inspections of all Village outfalls.
2. Continue to document elimination of illicit discharges to/from the storm sewer system if/when they become evident.
3. Access and document online illicit discharge detection and elimination training for applicable Village staff.
4. Continue to document updates of the Village's storm sewer system and drainage area mapping.

(Please see **Appendix D** for documents and records pertaining to MCM 3.)

## 5.0 MCM 4 Construction Site Runoff Control (GP-0-24-001 pgs. 38-41)

The Construction Site Runoff Control measure requires the Village to implement and enforce a program that provides equivalent protection to the NYS SPDES General Permit for Stormwater Discharges from Construction Activities and that addresses stormwater runoff from construction activities that are greater than or equal to one acre (or less, if part of a common plan of development or sale) with the potential to discharge to surface waters via the Village's storm sewer system outfalls. The Village uses the NYS SPDES General Permit for Stormwater Discharges from Construction Activities, and the NYS DEC Standards and Specifications for Erosion and Sediment Control to guide implementation of its construction site runoff control program. The Village's MCM 4 program prioritizes regulated construction site activities with the potential to discharge to surface waters through Village outfalls. (Please see **Appendix E** for documents and records pertaining to MCM 4.)

Specific MCM 4 requirements include:

- Adoption and enforcement of a local law, equivalent to the model law provided by NYS DEC, that requires a Stormwater Pollution Prevention Plan (SWPPP) for each applicable land disturbing activity that includes erosion and sediment controls that meet the NYS DEC's most current technical standards.
- Procedures for SWPPP review by trained individuals.
- Procedures for receipt and follow-up on complaints or other information submitted by the public regarding construction site stormwater runoff.
- Procedures for site inspections by trained staff and enforcement of erosion and sediment control measures.
- Education for construction site owners and municipal staff regarding construction stormwater regulatory requirements.
- An inventory of active regulated construction sites, including the location of the site and owner/operator contact information.

The Village Building Inspector oversees the construction site runoff control aspects of the SWMPP.

### Contact Information

Christopher Talbot  
Village of Southampton Senior Building Inspector  
Telephone: 631 283 0247

### 5.1 MCM 4 BMP: Local Law

The Village of Southampton used the model local law for stormwater management and erosion and sediment control provided by the NYS DEC and adopted Village Code Chapter 93, which requires construction site operators to adhere to the requirements of the NYS DEC SPDES

Construction General Permit and to conform to the NYS DEC Technical Standards for Erosion and Sediment Control and the NYS DEC Design Manual for post construction stormwater practices. (Please see **Appendix E.**)

### **5.2 MCM 4 BMP: Procedures for SWPPP Review**

The Building Department is responsible for oversight of regulated construction activity within the Village. Such activities include land disturbances of an acre or more with the potential to discharge to surface waters through the Village's storm sewer system. The Building Department is responsible for overseeing Stormwater Pollution Prevention Plan (SWPPP) reviews, which are conducted by a contracted engineering firm, Nelson, Pope & Voorhis (NPV). NPV uses the NYS DEC SPDES Construction General Permit, the NYS DEC November 2016 Erosion and Sediment Control Plan Review Checklist, and the NYS DEC Design Manual for review of SWPPPs. Written comments are provided to applicants on SWPPP submissions. Subsequent SWPPP revisions are reviewed in the same manner. Once a SWPPP is deemed acceptable by the Village's consultant, it is recommended to the Village Building Inspector for acceptance. Upon receipt of current NYS DEC-sponsored 4-hour training certificates for project contractors, the Village issues the MS4 Acceptance Form, signed by the Village Building Inspector. (Please see **Appendix E.**)

### **5.3 MCM 4 BMP: Procedures for Follow-up on Information Provided by the Public**

The Building Department is responsible for receiving and responding to information and complaints received from the public regarding construction activity. Records of calls and correspondence received from the public are kept on file and referred to the Village Building Inspector for follow-up. In the event that such communications are received, a record is kept on a log sheet and the Village Building Inspector follows up with the applicable construction site operator as appropriate. Typically, verbal instructions suffice in resolving any issues. However, the Building Inspector is authorized to undertake enforcement measures when necessary. Please see **Appendix E** for the log sheet that is used by the Building Department for tracking information received from the public regarding construction activity and the follow-up completed by the Village.

### **5.4 MCM 4 BMP: Procedures for Construction Site Inspections and Enforcement**

The Building Department is responsible for inspection of regulated construction activity within the Village. Such activities include land disturbances of an acre or more with potential to discharge to surface waters through the Village's outfalls. The Village's Building Inspector uses the NYS DEC Construction Site Stormwater Inspection Manual and the NYS DEC July 2016 Construction Inspection Form when conducting site inspections. Inspections occur as necessary throughout construction project activity to ensure compliance. Routine construction inspections will be conducted in accordance with site sensitivity and major storm events and will also occur at other times as necessary. (Please see **Appendix E.**) Deficiencies are noted and communicated to the site operator. Typically, verbal instructions suffice in resolving any issues.

Follow-up and/or enforcement measures, including Stop Work Orders, are undertaken as appropriate.

#### **5.5 MCM 4 BMP: Education for Construction Site Operators and Municipal Staff**

The Building Department ensures that construction site operators within the Village have received NYS DEC-sponsored 4-hour training by requiring current training certificates before an MS4 Acceptance Form is issued. Village staff are trained on an ongoing basis regarding SWMP VOS MCM 4 procedures and NYS DEC regulatory requirements. Village staff with construction site inspection responsibilities are required to renew their NYS DEC-sponsored 4-hour training certificates every 3 years. (Please see **Appendix E.**)

#### **5.6 MCM 4 BMP: Procedures to Ensure Construction Operators Have Received DEC Training**

The Building Department ensures that construction site operators within the Village have received NYS DEC-sponsored 4-hour training by requiring current NYS DEC-sponsored 4-hour training certificates before an MS4 Acceptance Form is issued. In addition, the Village provides a brochure that outlines NYS DEC Construction General Permit requirements and Village Code Chapter 93 procedures. (Please see **Appendix E.**)

#### **5.7 MCM 4 BMP: Inventory of Active Regulated Construction Sites**

The Building Department maintains an inventory of the active regulated construction sites within the Village. (Please see **Appendix E.**) Regulated construction sites include those that are greater than or equal to one acre (or less if part of a common plan of development or sale) with the potential to discharge to surface waters via the Village's storm sewer system outfalls. Active sites include those regulated construction sites for which a Notice of Termination has not yet been approved by the Village.

#### **5.8 MCM 4 BMP: Final Stabilization and Notices of Termination**

The Village is required to determine if it is acceptable for the owner/operator of a regulated construction project to submit the required Notice of Termination (NOT) to NYSDEC at the end of construction. The NOT serves to verify that all permanent stormwater control measures are functioning properly and that the site is in stable condition. The Village will make the determination through either a final stormwater compliance site inspection, or by accepting a Qualified Inspector's final certification as required by the NYSDEC SPDES General Permit for Stormwater Discharges from Construction Activity. The principal executive officer, ranking elected official, or duly authorized municipal representative (see Part VI.J.) will sign the "MS4 Acceptance" statement on the NOT upon receipt of a post-construction practice maintenance agreement or covenant as required by the NYSDEC and prior to issuance of a Certificate of Occupancy. (Please see **Appendix E.**)

#### **5.9 MCM 4 Measurable Goals (March 2021-March 2022)**

1. Continue to review SWPPPs and ensure that they conform to NYS DEC technical standards.

2. Continue to document and respond to information received from the public regarding construction activity.
3. Continue to document inspection of regulated construction sites and ensure that NYS DEC erosion and sediment control requirements are satisfied.
4. Continue to educate staff and construction site operators regarding construction stormwater regulatory requirements.
5. Continue to document verification that staff and construction site contractors have received NYS DEC-sponsored 4-hour training as required every 3 years.
6. Continue to maintain an inventory of active regulated construction sites, including the location of the site and owner/operator contact information.

(Please see **Appendix E** for documents and records pertaining to MCM 4.)

## **6.0 MCM 5 Post Construction Stormwater Management (GP-0-24-001 pgs. 42-45)**

The Construction Site Runoff Control measure requires the Village to implement and enforce a program that provides equivalent protection to the NYS SPDES General Permit for Stormwater Discharges from Construction Activities and that addresses stormwater runoff from construction activities that are greater than or equal to one acre (or less, if part of a common plan of development or sale) with the potential to discharge to surface waters via the Village's storm sewer system outfalls. The Village uses the NYS SPDES General Permit for Stormwater Discharges from Construction Activities, the NYS DEC Design Manual, and the NYS DEC Stormwater Management Practices Maintenance Guidance manual to guide its post-construction stormwater management program. (Please see **Appendix E** for documents and records pertaining to MCM 5.)

Specific MCM 5 requirements include:

- Adoption and enforcement of a local law, equivalent to the model law provided by NYS DEC, that requires post construction runoff controls from new development and re-development projects that meet the NYS DEC's most current technical standards.
- Procedures for SWPPP review by trained individuals.
- Procedures to inspect development and re-development sites by trained staff and to conduct enforcement.
- An inventory of post-construction stormwater management practices with the potential to discharge to surface waters through Village storm sewer system outfalls, including the location of the site, the type of practice and maintenance information.
- Procedures to ensure adequate long-term operation and maintenance of management practices.

The Village Building Inspector oversees the post construction stormwater management control aspects of the SWMPP.

### **6.1 MCM 5 BMP: Local Law**

The Village of Southampton used the model local law for stormwater management and erosion and sediment control provided by the NYS DEC and adopted Village Code Chapter 93, which requires construction site operators to adhere to the requirements of the NYS DEC SPDES Construction General Permit and to conform to the NYS DEC Technical Standards for Erosion and Sediment Control and the NYS DEC Design Manual for post construction stormwater practices. (Please see **Appendix E**).

### **6.2 MCM 5 BMP: Procedures for SWPPP review**

The Building Department is responsible for oversight of regulated construction activity within the Village. Such activities include land disturbances of an acre or more with the potential to

discharge to surface waters through the Village's storm sewer system. The Building Department is responsible for overseeing Stormwater Pollution Prevention Plan (SWPPP) reviews, which are conducted by a contracted engineering firm, Nelson, Pope & Voorhis (NPV). NPV uses the NYS DEC SPDES Construction General Permit, the NYS DEC November 2016 Erosion and Sediment Control Plan Review Checklist, and the NYS DEC Design Manual for review of SWPPPs. Written comments are provided to applicants regarding SWPPP elements that are incorrect, inconsistent, and/or are omitted. Subsequent SWPPP revisions are reviewed in the same manner. Once a SWPPP is deemed acceptable, NPV provides a recommendation to the Village that an MS4 Acceptance Form be issued to the applicant upon receipt of current NYS DEC-sponsored 4-hour training certificates for project contractors. Once the training certificates are received, the Village issues the MS4 Acceptance Form, signed by the Village Building Inspector. Please see **Appendix E** for the SWPPP Review Checklist and MS4 Acceptance Forms that are used by the Village.

### **6.3 MCM 5 BMP: Procedures for Construction Site Inspections and Enforcement**

The Building Department is responsible for inspection of regulated construction activity within the Village. Such activities include land disturbances of an acre or more with potential to discharge to surface waters through the Village's outfalls. The Village's Building Inspector uses the 7-page July 2016 NYS DEC Construction Inspection Form when conducting site inspections. Inspections occur as necessary throughout construction project activity to ensure compliance. Routine construction inspections will be conducted in accordance with site sensitivity and major storm events and will also occur at other times as necessary. Deficiencies are noted and communicated to the site operator. Typically, verbal instructions suffice in resolving any issues. Follow-up and/or enforcement measures, including Stop Work Orders, are undertaken as appropriate. (Please see **Appendix E**.)

### **6.4 MCM 5 BMP: Inventory of Post-Construction Stormwater Management Practices**

Using the Village's MS4 storm sewer system drainage area mapping, the Building Department maintains an inventory of stormwater management practices with the potential to discharge to surface waters through Village storm sewer system outfalls, including the location of the site, the type of practice and maintenance information. (Please see **Appendix E**.)

### **6.5 MCM 5 BMP: Procedures to Ensure Long Term Maintenance of Stormwater Practices**

The Department of Public Works regularly maintains Village post construction stormwater practices (primarily leaching pools) and inspects its post construction practices and storm sewer system components that connect to surface water outfalls for evidence of illicit discharges including overflows from post-construction practices on private property. To date no such overflows have been observed. The Village's Vac-con truck is used twice a week on average. Drainage maintenance activities are focused on flood prone areas or where special attention is needed to ensure that large runoff is sufficiently infiltrated to prevent discharge to the storm

sewer system. During rain events highway workers monitor for ponding conditions and address any basins that may need maintenance or repair. In the event that a discharge from a post-construction practice on private property is found to cause or contribute to a water quality or flooding issue, the Building Department would require it to be addressed through maintenance of the practice. (Please see **Appendix E.**)

Owners of private property with drainage practices that have the potential to discharge to surface waters via Village storm sewer system outfalls are required by Village Code Chapter 93, Schedule B, to file Covenants and Restrictions that require drainage practices to be inspected and maintained as necessary a minimum of once every five years. Covenants and Restrictions will be required as part of the Village's authorization of a Notice of Termination from the NYSDEC Construction General Permit and prior to issuance of a Certificate of Occupancy. See post construction practices inventory in **Appendix E.**

#### **6.6 MCM 5 Measurable Goals (March 2021-March 2022)**

1. Continue to review SWPPPs and ensure that they conform to NYS DEC technical standards.
2. Continue to document inspections of regulated construction sites and ensure that NYS DEC post construction stormwater management Design Manual standards are satisfied.
3. Continue to maintain an inventory of regulated construction sites.
4. Continue to require documentation of covenants for post-construction practice maintenance prior to approving Notices of Termination.
5. Continue to document inspection of storm sewer system components that connect to surface water outfalls for evidence of illicit discharges, including overflows from post-construction practices on private property.
6. Continue to ensure that private post construction practice discharges, if any, are documented and addressed through maintenance as necessary.

(Please see **Appendix E** for documents and records pertaining to MCM 5.)

## 7.0 MCM 6 Pollution Prevention and Good Housekeeping (GP-0-24-001 pgs. 47-50)

The VOS SWMPP addresses the geographic areas that drain to Village storm sewer system outfalls that discharge to surface waterbodies. The Pollution Prevention and Good Housekeeping control measure requires the Village to implement a pollution prevention and good housekeeping program for municipal operations and facilities that contribute pollutants to surface waters via Village storm sewer system outfalls. The Village uses the NYS DEC Pollution Prevention and Good Housekeeping Assistance Document to guide its MCM 6 program. (Please see **Appendix F** for documents and records pertaining to MCM 6.)

Specific MCM 6 requirements include:

- Self-assessment of municipal operations and facilities to determine the sources of pollutants potentially generated by them.
- Implementation of practices to reduce the discharge of pollutants from municipal facilities and operations to surface waters via Village storm sewer outfalls.
- Pollution prevention and good housekeeping training for staff.
- Certification by third party entities performing contracted services that they will meet MS4 General Permit requirements.
- Techniques to reduce the use of fertilizers, pesticides, and herbicides.

Stephen Phillips Jr., Department of Public Works Superintendent, oversees the pollution prevention and good housekeeping aspects of the SWMPP.

### 7.1 MCM 6: Municipal Facilities within the MS4 Drainage Area

**Table 4: Municipal Facilities within the Village of Southampton MS4 Drainage Area**

Facility Name	Location	Description
Agawam Park	South side of Jobs Lane/east side of Pond Lane	Park, playground, rest rooms, war memorial
Doesher Park	37A South Main St.	Open land (mowed)
Pyrrhus Concer	51 Pond Lane	Historic structures/mowed lawn
Vets Cultural Center	25 Pond Lane	Art gallery, performance, mtg rooms
Southampton Arts Center	25 Pond Lane	Art gallery, performance
Windmill Lane Firehouse	25 Windmill Lane	Firehouse
Hampton Rd Firehouse	470 Hampton Rd.	Firehouse
Ambulance Building	165 Windmill Lane	Building
Police Dept Bldg	151 Windmill Lane	Building
Nugent/Windmill Lot	17 Nugent St	Pocket park (mowed lawn), no facilities.
Monument Square	Hill St./Jobs Lane/Pond Lane	Small triangular pocket park (mowed lawn), no

Facility Name	Location	Description
		facilities.
Shinnecock Park	Hill St./East Gate Rd./Montauk Highway intersection	Small triangular pocket park (mowed lawn), no facilities.
Fowler Nature Walk	Wickapogue Rd. (opposite Narrow Lane)	Nature trail, no facilities

**7.2 MCM 6 BMP: Self-Assessment of Municipal Facilities and Operations**

The Department of Public Works is responsible for conducting assessments of Village operations and facilities that have the potential to contribute pollutants to surface waters via Village storm sewer system outfalls at least once every three years and for modifying pollution prevention procedures when necessary. The NYSDEC *Municipal Pollution Prevention and Good Housekeeping Program Assistance Guidance Document (May 2006)* is used to guide MCM 6 self-assessments.

**7.3 MCM 6 BMP: Pollution Prevention Practices**

The Department of Public Works oversees and/or conducts the following activities to reduce the discharge of pollutants by Village operations and facilities from Village storm sewer system outfalls:

- **Street sweeping:** Street and parking lot maintenance in the Village is concentrated in the downtown business district, which includes the storm sewer system inlets and piping that discharge to Lake Agawam. In the summer season, street sweepers are run seven days a week to clean the gutter line and keep debris out of catch basins. Other than during the summer the frequency is reduced to twice a week or when weather permits. In the downtown business district, workers blow or wash down the sidewalk and shoulder areas daily in conjunction with a sweeper. Occasionally two sweepers are run at once as one is best for picking up sand and dirt and the other is more suitable for leaves and lighter debris.

All applicable roads, bridges, parking lots, and right of ways are swept and/or cleaned at a minimum of once every five years in the spring (following winter activities such as sanding). Annually, from April 1 through October 31, applicable roads in the business district and commercial areas are swept.

- **Winter street maintenance:** Salt and salt storage is located at 102 Willow Street where there are three bays with permanent covers. This storage area is permitted by Suffolk County and is inspected annually. There are no storm drains that discharge to the MS4

system in this area, therefore the activities at the Willow Street facility are not included in the Village's MS4 stormwater management program plan.

Multiple loaders and plow trucks are used to handle snow removal. Four spreaders are used for roadway salt or salt/sand treatments. Mechanics maintain and calibrate these units before and during winter events. Supervisors ensure the minimum use of these materials depending on existing conditions and the need to protect the safety of roadway travelers. Equipment is emptied and cleaned after each use unless another storm is imminent.

- **Drainage system maintenance:** The Village owns a Vac-con basin cleaner, which is used year-round. It is used most heavily (weekly) during Spring and Fall. If a larger system has multiple clogged basins or pipes, additional workers are allocated as needed. Work is concentrated in flood prone areas or where special attention is needed to ensure that large drywell systems infiltrate runoff sufficiently to prevent discharge to the storm sewer system. During rain events highway workers monitor for ponding conditions and address any basins that need maintenance or repair. The Village regularly installs additional drainage basins to reduce runoff and discharges to the storm sewer system. Grant funding is pursued annually and on average is obtained for a new drainage improvement project every other year.
- **Vehicle washing and equipment maintenance:** DPW vehicle washing, fueling, and maintenance are performed by DPW at 102 Willow Street (which is outside the Village's MS4 stormwater contributing area).

Fire Department vehicles are only to be washed at the Hampton Road Fire Station where an oil/water separator is in the process of being designed/permitted through the Suffolk County Department of Health to treat vehicle wash water. Police Department vehicles are washed at local commercial car wash sites. Fire Department and Police Department vehicles are fueled and maintained at the 102 Willow Street facility.

- **Landscaping and pest control:** The Village's policy is to not use any toxic pesticides, herbicides or fertilizers. Only light use of organic fertilizer (Milorganite) occurs typically once a year on limited Village maintained properties (parks). Weed control is accomplished using organic products (corn gluten and Burnout). Turf care mainly consists of irrigation control, aeration, and over-seeding. The majority of the Village's Parks Dept staff are Green Gorilla certified. All packaged organic materials are stored indoors and away from weather. Two staff members are NYS-certified applicators. While very infrequent, organic tick spray [complying with EPA Regulations for 25(b) exempt pesticides] may be applied by a certified applicator.

- **Pet waste disposal:** The Village provides mutt mitt dispensers for pet waste throughout the downtown area, beaches, and parks. A Village ordinance is in place that requires proper pet waste disposal.
- **Building maintenance:** The heating systems at all but two Village facilities have been converted to natural gas. Oil tanks are registered and permitted by Suffolk County and are of small capacity. All oil tanks have overspill protection and regularly inspected for leaks.
- **Solid waste management:** The Village collects solid waste from municipal containers in the downtown area, at parks, and at beaches using two small compacting garbage trucks. All materials collected are transported to a local vendor for proper disposal and/or recycling. Rare instances of illegal dumping are referred to the Village Police Department. The Village does not collect any materials from private homeowners or businesses. Anti-littering signage is located throughout the Village. Beach cleanups are performed with local non-profit groups.
- **Recycling:** The Village provides fall leaf pickup for residents. All materials are carted to the Town Recycling center. Brush and Christmas trees are chipped into mulch and used to fill stump holes, in landscaping, or for maintenance of walking trails. Old paints, oil, chemicals, etc., generated by all Village facilities and operations, including the Police and Fire Depts, are taken to a private vendor who handles recycling and/or disposal. Police and Fire Dept trash and recycling materials are collected by the Highway Dept and taken to a local vendor for disposal.
- **Hazardous waste management:** Use and storage of hazardous materials, including vehicle maintenance and fueling, is limited to the Village DPW Yard (102 Willow Street, which is outside the Village MS4 contributing area). Such materials are stored either indoors or in designated outdoor areas that are covered, on impervious surfaces, away from high traffic areas, and outside of drainage pathways. Hazardous waste materials are brought to a local vendor for proper disposal.
- **Roadkill disposal:** Roadkill such as deer are placed in a dugout trench on a wooded property at Sebonac Road and Tuckahoe Lane away from any wetlands or surface waters. They are buried in wood chips to hasten decomposition.

#### 7.4 MCM 6 BMP: Drainage Improvement Projects

The Village of Southampton regularly implements drainage improvement projects that are specifically designed to reduce the impacts of storm sewer system outfall discharges on surface

waters. The Village is currently working on a Gin Lane drainage project which will eliminate an outfall to Lake Agawam.

### **7.5 MCM 6 BMP: Pollution Prevention and Good Housekeeping Training**

Village staff with responsibilities related to MCM 6 receive on-the-job training and access trainings available on the Internet on an ongoing basis to ensure that they effectively fulfill implementation of MCM 6 requirements.

### **7.6 MCM 6 BMP: Certifications By Third Party Entities**

Entities with which the Village contracts for the fulfillment of SWMPP tasks are required to sign certifications and attest they will abide by the requirements of the NYS DEC MS4 General Permit.

### **7.7 MCM 6 BMP: Techniques to Reduce Use of Fertilizers, Pesticides and Herbicides.**

The Village's policy is to entirely refrain from using toxic fertilizers, pesticides, and herbicides. Only minimal applications of organic treatments are used on Village properties. The Village maintains documentation of its use of organic compounds on Village properties.

### **7.8 MCM 6 Measurable Goals (March 2021-March 2022)**

1. Continue to perform self-assessments of municipal operations and facilities at least once every 3 years.
2. Continue to document street sweeping, stormsewer system maintenance, vehicle and equipment maintenance, parks and buildings landscaping/pest control, and debris collection within the MS4 drainage area to reduce the discharge of pollutants from municipal facilities and operations to surface waters via Village storm sewer outfalls.
3. Continue to apply for funding and/or to implement drainage improvement and green infrastructure projects within the MS4 drainage area.
4. Evaluate the feasibility of replacing one of the street sweepers and/or the vac truck.
5. Continue to document use of organic landscaping and pest control compounds at facilities within the MS4 drainage area.

(Please see **Appendix F** for documents and records pertaining to MCM 6.)