

**Notice of Intent (NOI)**  
for Stormwater Discharges from Municipal  
Separate Storm Sewer Systems (MS4) General  
Permit 3-9014



Submission of this Notice of Intent (NOI) constitutes notice that the entity in Section A intends to be authorized to discharge pollutants to waters of the State under Vermont's Municipal Separate Storm Sewer Systems (MS4) permit. Submission of the NOI also constitutes notice that the party identified in Section A of this form has read, understands and meets the eligibility conditions; agrees to comply with all applicable terms and conditions; and understands that continued authorization under the MS4 General Permit is contingent on maintaining eligibility for coverage. In order to be granted coverage, all information required on this form and the Minimum Control Measure attachments must be completed and a complete Stormwater Management Program (SWMP) Plan must be submitted.

**A. Permittee Information**

Name of MS4: City of Burlington, Burlington International Airport

Name of Principle Executive Officer (PEO) or Chief Elected Official (CEO): Gene Richards, III Title: Interim Director of Aviation

Mailing Address:  
Street/P.O. Box: 1200 Airport Drive, #1

City/Town: South Burlington State: Vermont Zip: 05403

Phone: (802) 863-2874 Email: grichards@btv.aero

**B. Primary contact responsible for overall coordination of SWMP, if different than PEO/CEO**

Name: Heather A. Kendrew, P.E., Director of Maintenance, Engineering, and Environmental Compliance

Mailing Address:  
Street/P.O. Box: 1200 Airport Drive, #1

City/Town: South Burlington State: Vermont Zip: 05403

Phone: (802) 863-2874 ext. 302 Email: hkendrew@btv.aero

**C. Partnering organization responsible for Minimum Control Measure implementation** (if applicable)

If you are participating in the CCRPC MOU to implement MCM1 &/or MCM2 check here: ☒ MCM 1  
Or, if you are relying on another entity to implement a MCM, please complete the following: ☒ MCM 2

Organization: \_\_\_\_\_ Contact: \_\_\_\_\_

Minimum Control Measure being implemented: \_\_\_\_\_

Mailing Address:  
Street/P.O. Box: \_\_\_\_\_

City/Town: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_

Phone: \_\_\_\_\_ Email: \_\_\_\_\_

Organization: \_\_\_\_\_ Contact: \_\_\_\_\_

Minimum Control Measure being implemented: \_\_\_\_\_

Mailing Address:  
Street/P.O. Box: \_\_\_\_\_

City/Town: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_

Phone: \_\_\_\_\_ Email: \_\_\_\_\_

**D. Municipal Separate Storm Sewer System (MS4) Information**Estimate of the square mileage served by the MS4: 1.47 Square Miles (942± acres)**Identify the names of all know waters that receive a discharge from the MS4:**

Receiving water	# of outfalls	Impaired status	Nature of impairment
Unnamed Tributary of the Winooski River	Five (5)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	None.
Muddy Brook	One (1)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Toxics, Nutrients, and Temperature.
Class2 Wetland contiguous with Muddy Brook	Five (5)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	None. Impairment noted at Outfall.
Class2 Wetland contiguous with Potash Brook	Five (5)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	E. Coli (Potash Brook)
South Burlington Stormwater Collection Sys.	One (1)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Assume Potash Brook. E.Coli.
		<input type="checkbox"/> Yes <input type="checkbox"/> No	
		<input type="checkbox"/> Yes <input type="checkbox"/> No	
		<input type="checkbox"/> Yes <input type="checkbox"/> No	
		<input type="checkbox"/> Yes <input type="checkbox"/> No	
		<input type="checkbox"/> Yes <input type="checkbox"/> No	
		<input type="checkbox"/> Yes <input type="checkbox"/> No	

**E. Stormwater Impaired Waters Information**Does the MS4 discharge into a stormwater impaired water? ☒ Yes ☐ No

If yes, the MS4 must comply with all requirements listed in Part IV.C. of the permit, including the requirement to develop a Flow Restoration Plan (FRP) for the stormwater impaired water.

**F. Certification**

This NOI shall be signed by a principal executive officer, ranking elected official or other duly authorized employee, consistent with 40 CFR §122.22(b) and certified as follows:

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

Name: Heather A. Kendrew, P.E. Title: Director of Maintenance/Engineering/EnvironmentSignature:  Date: 5/28/13**Submit this *Original* form and the \$1320 fee to:**

MS4 Permit Coordinator  
VTDEC · Watershed Management Division  
Stormwater Management Program  
One National Life Drive  
Montpelier, Vermont 05620-3522



## **Instructions for Public Comment, Public Hearings, and Appeals**

### **PUBLIC COMMENT**

Public comments concerning this Notice of Intent to discharge under General Permit No 3-9014 and the accompanying Stormwater Management Plan (SWMP) are invited and must be submitted within 10 days of receipt of this Notice by the Municipal Clerk. Comments should address how the application complies or does not comply with the terms and conditions of General Permit No. 3-9014. A letter of interest should be filed by those persons who elect not to file comments but who wish to be notified if the comment period is extended or reopened for any reason. All written comments received within the time frame described above will be considered by the Department of Environmental Conservation in its final ruling to grant or deny authorization to discharge under General Permit No. 3-9014.

All submitted NOIs and SWMPs can be found on the Stormwater Program's website at:  
[http://www.vtwaterquality.org/stormwater/htm/sw\\_ms4.htm](http://www.vtwaterquality.org/stormwater/htm/sw_ms4.htm)

Send written comments to: VT DEC, Watershed Management Division  
Stormwater Management Program, MS4 Permit Coordinator  
One National Life Drive  
Montpelier, VT 05620-3522

### **PUBLIC HEARING REQUEST**

During the notice period, any person may submit a written request to this office for a public hearing to consider the proposed permit authorization. The request must state the interest of the party filing such request and the reasons why a hearing is warranted. A hearing will be held if there is a significant public interest (including the filing of requests or petitions for such hearing) in holding such a hearing. If the Secretary determines that useful information and data may be obtained thereby, the Secretary may hold a public hearing any time prior to the issuance of the authorization. Notice of a public hearing will be circulated 30 days prior to the hearing. (40 C.F.R. § 124.12 and Vermont Water Pollution Control Permit Regulations, Chapter 13.3G)

### **APPEALS**

Pursuant to 10 V.S.A. Chapter 220, any appeal of this decision must be filed with the clerk of the Environmental Court within 30 days of the date of the decision. The appellant must attach to the Notice of Appeal the entry fee of \$250.00, payable to the state of Vermont.

The Notice of Appeal must specify the parties taking the appeal and the statutory provision under which each party claims party status; must designate the act or decision appealed from; must name the Environmental Court; and must be signed by the appellant or their attorney. In addition, the appeal must give the address or location and description of the property, project or facility with which the appeal is concerned and the name of the applicant or any permit involved in the appeal.

The appellant must also serve a copy of the Notice of Appeal in accordance with Rule 5(b)(4)(B) of the Vermont Rules for Environmental Court Proceedings.

For further information, see the Vermont Rules for Environmental Court Proceedings, available on line at [www.vermontjudiciary.org](http://www.vermontjudiciary.org). The address for the Environmental Court is 2418 Airport Road, Suite 1, Barre, VT 05641 (Tel. # 802-828-1660)

A copy of General Permit No. 3-9014 may be obtained by calling (802) 490-6173; by visiting the Department at the above address between the hours of 7:45 am and 4:30 pm; or by downloading from the Watershed Management Division's Web site at [www.vtwaterquality.org](http://www.vtwaterquality.org).

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**BURLINGTON INTERNATIONAL AIRPORT (BTV)  
NOTICE OF INTENT NARRATIVE**

For General Permit 3-9014 (2012)  
National Pollutant Discharge Elimination System (NPDES) Number: VTR040000  
For Stormwater Discharges from Small Municipal Separate Storm Sewer Systems  
June 3, 2013

## **1.0 Background**

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The 1987 Amendment to the Federal Clean Water Act (CWA) of 1972 (CWA 402(p)(5)) directed the Environmental Protection Agency (EPA) to address the problems of flooding, water pollution and public health threats caused as a result of stormwater runoff from developed lands or as commonly termed, urban stormwater runoff. This runoff from roads, rooftops and other impervious surfaces associated with developed lands causes erosion/property damage; endangers or destroys aquatic wildlife and wildlife habitats; causes unhealthy algal blooms; and endangers public health via contact during recreation sports by contaminating source water used for public water supplies.

The CWA required that the EPA address urban stormwater runoff in a phased approach starting with the largest urban areas in the United States based on population census data. In November 1999, the EPA issued new federal stormwater regulations known as the Phase II Stormwater Rule for metropolitan areas of less than 100,000 people.

Under the Phase II Rule, nine municipalities in Vermont with municipal separate storm sewer systems (MS4) are required to seek coverage under the MS4 General Permit or apply for an individual permit. These are Burlington, South Burlington, Colchester, Milton, Winooski, Essex, Essex Junction, Williston and Shelburne. In addition to these municipalities, three publicly owned, non-traditional separate storm sewer systems have also been designated and are required to seek coverage. These systems are owned or operated by the University of Vermont, Burlington International Airport (BTV) and the Vermont Agency of Transportation.

The MS4 General Permit is a National Pollutant Discharge Elimination System (NPDES) permit and has a five-year permit term. The requirements of this MS4 General Permit apply to areas served by each MS4 that are located within either the U.S. Census Bureau designated urban area (UA) or watersheds that are principally impaired by stormwater and so classified by the Vermont Agency of Natural Resources, Department of Environmental Conservation (DEC).

As a permit condition, each MS4 must develop, implement and enforce a Stormwater Management Program (SWMP) designed to reduce the discharge of pollutants from the MS4 to the maximum extent practicable (MEP), to protect water quality, and to satisfy the appropriate water quality requirements of the Clean Water Act. Implementation of best management practices consistent with the provisions of the SWMP required pursuant to this permit constitutes compliance with the standard of reducing pollutants to the "maximum extent practicable".

The SWMP must be developed and implemented by the expiration date of the MS4 permit, and must include information for the minimum control measures as described in the permit.

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There are six minimum control measures required of each designated permittee under the MS4 General Permit: (1) *Public Education and Outreach*, (2) *Public Participation/Involvement*, (3) *Illicit Discharge Detection and Elimination*, (4) *Construction Site Runoff Control*, (5) *Post-Construction Runoff Control*, and (6) *Pollution Prevention/Good Housekeeping*.

Each MS4 must also comply with certain special conditions, including: *Water Quality Controls for Discharges to Impaired Water bodies*, *Consistency with Total Maximum Daily Load (TMDL) Requirements* and *Source Water Protection requirements*.

In June 2003, BTV filed a Notice of Intent for General Permit 3-9014. The Notice of Intent (NOI) included a narrative that outlined how BTV planned to comply with the six minimum control measures and special conditions noted above. Subsequently, BTV submitted an updated NOI and complete SWMP in April, 2008. Since submittal of the 2008 NOI, BTV has implemented or is in the process of implementing many of the Best Management Practices (BMP's) proposed under the six minimum measures.

The Vermont Department of Environmental Conservation (DEC) issued General Permit 3-9014 (2012) for Stormwater Discharges from Small Municipal Separate Storm Sewer Systems (MS4) on December 5, 2012. Designed to address pollution from stormwater runoff, the re-issued MS4 permit applies to thirteen municipalities and three institutional entities in the Lake Champlain watershed. Communities already subject to the 2003 MS4 General Permit include Burlington, Colchester, Essex, Essex Junction, Milton, Shelburne, South Burlington, Williston and Winooski, as well as the non-municipal or non-traditional entities including the Burlington International Airport, the University of Vermont, and the Vermont Agency of Transportation within the geographical boundaries of these municipalities.

In addition to the communities noted above, which need to meet the new requirements of the updated permit, the DEC has designated Rutland town and city, and St. Albans town and city as new MS4s subject to the requirements of the newly issued General Permit 3-9014 (2012). The primary additional condition of General Permit 3-9014 (2012) is the requirement to develop and submit a Flow Restoration Plan (FRP) for the portion of each stormwater – impaired watershed located within a permittee's boundaries.

General Permit 3-9014 (2012) requires permit holders to implement the required stormwater control and flow restoration practices as soon as possible, but no later than twenty years from December 5, 2012.

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## **2.0 Discharges to Impaired Waters (Flow Restoration Plan)**

Impaired waters are those waters that the Secretary of the VT ANR has identified pursuant to Section 303(d) of the Clean Water Act as not meeting the Vermont Water Quality Standards. As part of the re-authorized General Permit 3-9014 (2012) MS4 permit requirements, each MS4 must evaluate, monitor, and develop plans for each discharge to an impaired water with approved Total Maximum Daily Loads (TMDL), and to impaired waters for which a TMDL has not yet been approved by the Secretary of the Vermont Agency of Natural Resources (VT ANR) or the U.S. Environmental Protection Agency (EPA).

BTV discharges stormwater runoff to two impaired waters of the State. One outfall (DO18) discharges to Muddy Brook, while five outfalls (POO1, POO2, POO5, POO6, and POO7) discharge to Class 2 wetlands contiguous to Potash Brook. Both waterways are considered to be impaired yet one waterway has no approved TMDL while the other has an approved TMDL.

### **1.2 DISCHARGES TO IMPAIRED WATERS WITH AN APPROVED TMDL**

Potash Brook is an impaired water with a Total Maximum Daily Load (TMDL) that was approved by EPA on December 19, 2006. For the Potash Brook TMDL, it is stormwater runoff volume that is being limited overall and allocated among sources.

Table 1 below gives the overall Potash Brook TMDL allocation for the high flows only. EPA does not consider the low flow targets applicable to an allocation scenario, and thus they were not presented as such in the TMDL.

It is noted that even though the low flow targets are not part of the formal TMDL allocation, VT DEC remains committed to retaining these low flow targets within the overall remediation plan for the watershed.

**Table 1 - Potash Brook TMDL High Flow Allocation at Q0.3%.**

Wasteload Allocation	Stormwater reduction from current Urban/Developed areas	-14.6%	-16.5%
	Additional stormwater flow reduction from Urban/Developed areas to account for future growth	-1.9 %	
Load Allocation	Stormwater reduction from Agriculture/Open areas		-1.4%
Total Potash Brook watershed stormwater flow reduction allocation at Q0.3%			-17.9 %



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BTV has five discharges that drain to a Class 2 wetland, contiguous with a tributary to Potash Brook. Potash Brook in turn drains to Lake Champlain. The outfall designations are PO01, PO02, PO05, PO06, and PO07 as depicted on the Storm Sewer System Map contained in Appendix D. These five outfalls are located at the southern end of the BTV property site. Discharge point PO05 is also a sampling point for Benchmark Monitoring as a condition of BTV's General Permit 3-9003 MSGP. It is noted that discharge point PO01 has been plugged and buried, and no longer serves as a discharge point for stormwater runoff.

Flow Restoration Plan

BTV will work with the City of South Burlington during development and implementation of BTV's Flow Restoration Plan (FRP).

The following Flow Restoration Plan (FRP) development and implementation schedule will apply to BTV. Actual milestone dates are calculated from the date of issuance of an authorization to discharge to BTV under General Permit 3-9014 (2012) MS4.

- **Month 3** - BTV will submit a plan for approval for meeting the requirements of subsection IV.C.1(e)(7) (flow monitoring plan) by September 3, 2013.
- **Month 6** - BTV will submit a plan for approval for addressing expired state stormwater permits discharging to BTV's MS4 system by December 3, 2013. This plan may include a request to the Secretary to exercise its Residual Designation Authority (RDA) pursuant to Clean Water Act §§402(p)(2)(E) and (6) and 40 C.F.R. § 122.26 (a)(9)(i)(C) and (D) to require NPDES permits for stormwater systems with expired state stormwater permits. BTV's plan for addressing the expired permits will insure that all permitted facilities demonstrate compliance with the existing expired permit, at a minimum, and insure that these facilities are incorporated into the FRP.

The submitted plan will identify the process that BTV intends to use to meet the requirements of subsection IV.C.1 (development of FRP).

As part of the December 3, 2013 submission, BTV will submit verification of implementation of flow monitoring, per subsection IV.C.1(e)(7).

- **Month 12** - BTV will submit a Semi-Annual Report by June 3, 2014 for VT. DEC review.

The semi-annual report will provide information on the development and implementation of BTV's FRP. The report will address actions taken to implement all FRP components, including the extent of BMP implementation, an estimate of the extent of completion for remaining items, and an assessment of the ability to meet outstanding schedule items. The FRP report will include a written statement signed by a designer that any BMP built



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or implemented within the preceding 6 month period was constructed in compliance with the approved plans. BTV will include in each FRP report an estimate of any associated reductions in phosphorus loading that occur as a result of implementation measures undertaken by BTV to meet the flow reduction targets.

- **Month 18** - BTV will submit a Semi-Annual Report by December 3, 2014 for VT. DEC review.

The semi-annual report will provide information on the development and implementation of BTV's FRP. The report will address actions taken to implement all FRP components, including the extent of BMP implementation, an estimate of the extent of completion for remaining items, and an assessment of the ability to meet outstanding schedule items. The FRP report will include a written statement signed by a designer that any BMP built or implemented within the preceding 6 month period was constructed in compliance with the approved plans. BTV will include in each FRP report an estimate of any associated reductions in phosphorus loading that occur as a result of implementation measures undertaken by BTV to meet the flow reduction targets.

The semi-annual report will report the status of the BTV's development of the FRP, including a schedule for completion of the FRP.

- **Month 24** - BTV will submit a report by June 3, 2015 for VT. DEC review. The report will verify that all existing stormwater systems with expired permits are in compliance with the existing expired permit or subject to a NPDES RDA permit, including verification that all required maintenance has been performed.
- **Month 30** - BTV will submit a Semi-Annual Report by December 3, 2015 for VT. DEC review.

The semi-annual report will provide information on the development and implementation of BTV's FRP. The report will address actions taken to implement all FRP components, including the extent of BMP implementation, an estimate of the extent of completion for remaining items, and an assessment of the ability to meet outstanding schedule items. The FRP report will include a written statement signed by a designer that any BMP built or implemented within the preceding 6 month period was constructed in compliance with the approved plans. BTV will include in each FRP report an estimate of any associated reductions in phosphorus loading that occur as a result of implementation measures undertaken by BTV to meet the flow reduction targets.

- **Year 3** - BTV will submit a complete FRP by June 3, 2016 for VT. DEC review and approval.
- **Month 42 and Every 6 Months Thereafter** - BTV will submit a Semi-Annual Report by December 3, 2016 for VT. DEC review.

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The semi-annual report will provide information on the development and implementation of BTV's FRP. The report will address actions taken to implement all FRP components, including the extent of BMP implementation, an estimate of the extent of completion for remaining items, and an assessment of the ability to meet outstanding schedule items. The FRP report will include a written statement signed by a designer that any BMP built or implemented within the preceding 6 month period was constructed in compliance with the approved plans. BTV will include in each FRP report an estimate of any associated reductions in phosphorus loading that occur as a result of implementation measures undertaken by BTV to meet the flow reduction targets.

BTV will continue to submit a Semi-Annual Report every six (6) months after December 3, 2016 for VT. DEC review.

- **Year 20** - BTV will complete implementation of the approved FRP by June 3, 2033.

### **1.3 DISCHARGES TO IMPAIRED WATERS WITHOUT AN APPROVED TMDL**

BTV will comply with Part IV of General Permit 3-9014 (2012), and address in its SWMP and annual reports how any discharges that have the potential to cause or contribute to the impairment will be controlled so that they do not cause or contribute to the impairment.

Elimination of such discharges are not possible within 60 days. Therefore, BTV will submit to the VT ANR Secretary a plan for eliminating or controlling its discharges. The plan will include an assessment of whether MS4 discharges are potential contributors to the identified impairment and identify the sources of the discharge and, unless available information indicates that BTV's discharges are not a potential contributor to an impairment, a response plan that identifies additional or modified BMPs to be implemented. This plan shall be designed as an iterative process. If required, the content of the response plan will reflect the magnitude and complexity of the impairment and the BTV's potential to contribute to the impairment. This 60 day period does not constitute a grace period for purposes of enforcement of Water Quality Standards or of General Permit 3-9014 (2012) requirements.

BTV has one outfall discharging to Muddy Brook (DO18).

Muddy Brook is an impaired water as it is listed on page 5 of 9 in the *State of Vermont, 2010, 303(d) List of Waters, Part A – Impaired Surface Waters In Need of TMDL*. Muddy Brook is, therefore, an impaired water without an approved or established TMDL. Pollutants listed on the 303(d) list from the mouth to 7 miles upstream are "*Toxics, Nutrients, and Temperature*".

As part of the Impaired Waters monitoring requirement contained in BTV's General Permit 309003 MSGP, BTV is required to monitor the Muddy Brook outfall (DO18) annually for nutrients including Total Phosphorus and Total Nitrogen. Temperature does not need to be monitored. Stormwater

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discharge monitoring performed to date at outfall DO18 does not indicate elevated levels of Total Phosphorus or Total Nitrogen. Although not required, temperature is monitored and does not appear to be out of acceptable range in samples taken to date.

In addition, as part of the Benchmark monitoring requirement contained in BTV's General Permit 309003 MSGP, BTV is required to monitor the Muddy Brook outfall (DO18) quarterly for BOD, COD, Ammonia, and pH. Stormwater discharge monitoring performed during the winter 2012 - 2013 deicing season at outfall DO18 does not indicate elevated levels of all four constituents.

Although not required, temperature is taken at DO18 during all monitoring noted above. Results do not appear to be out of acceptable range in samples taken to date.

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### **3.0 Six Minimum Control Measures**

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This Narrative includes the status of BTV's compliance with permit conditions, an assessment of the appropriateness of the identified BMP's, progress toward achieving the statutory goal of reducing the discharge of pollutants to the MEP, and the measurable goals for each of the minimum control measures and special conditions.

#### **3.1 Minimum Measure #1 - Public Education and Outreach**

**1) BMP # 1:** BTV will continue to work with the Chittenden County Regional Stormwater Education Program (RSEP) in the continuing pursuit to educate the public as it relates to water quality issues.

*Status:* **Implemented.**

BTV has also provided an environmental page on the airport website. Links to the MS4 annual reports, the RSEP website and the City of Burlington stormwater management websites are included on the environmental page of the website. The environmental page address is <http://www.btv.aero/index.php/airport-guide/community-connection>

*Timeframe:* Not applicable.

*Measurable Goals:* Stormwater behavior changes in the public. This change will be assessed through a behavior survey conducted by the RSEP approximately every 5 years. The contractor responsible for conducting the survey will report findings to the RSEP.

*Person(s) Responsible for BMP:* The RSEP.

*Rationale for Selection:* With an ever increasing number of people utilizing the internet on a daily basis, a website is a cost effective way to reach the public and educate them about water quality related issues.

#### **3.2 Minimum Measure #2 - Public Participation/Involvement**

As an alternative to implementing three activities from the list noted in the General Permit 3-9014 (2012), BTV will participate in the regional stormwater public involvement and participation program described in the May 1, 2011 memorandum of understanding between the designated small MS4s and the Chittenden County Regional Planning Commission, or subsequent amendments as approved by the VT ANR Secretary, or in a regional public involvement and participation strategy if approved by the VT ANR Secretary.



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**1) BMP # 1:** The Chittenden County Regional Planning Commission (CCRPC) is in the process of creating a Chittenden County Stream Team (CCST). This Team will become the community outreach of the CCRPC related to stormwater issues.

*Status:* In the fall of 2009, the MS4 communities began to explore a collaborative approach to fulfilling their Minimum Control Measure #2 (MCM) permit requirement. At the request of these MS4s, the Chittenden County Regional Planning Commission (CCRPC) applied for and received two grants totaling \$22,500. Using these grants, CCRPC assisted the MS4s in developing a regional pilot project called the Chittenden County Stream Team (CCST). In its pilot year, CCST created a logo, launched a website and Facebook page, surveyed local residents, hosted a number of workshops, and completed a variety of local projects. The success of the pilot project lead to the formal adoption of the CCST program in 2011 by eleven of the MS4 communities including Burlington, South Burlington, Williston, Winooski, Shelburne, Milton, Essex, Essex Junction, the University of Vermont, VTrans and the Burlington Airport. The program was put out to bid and awarded to the Winooski Natural Resources Conservation District (WNRCD), a regional entity focused on natural resource protection and management. Under the guidance of the participating MS4s, the WNRCD completed a second successful year in fulfilling MCM2 requirement.

In 2012, the CCST template evolved to focus activities on three target towns per year. This year, they included Shelburne, Winooski, and Milton. A targeted approach aims to strengthen relationships in select areas and inspire greater involvement and capacity by volunteers. Similarly, they focused volunteer opportunities on four main categories in order to increase quality. They include: stream clean ups, Adopt-a-Rain Garden programming, water quality monitoring, and flow monitoring. Numbers of participants in activities were low in two of the targeted towns for 2012, Milton and Shelburne, though their participation in outreach was high. The time spent in 2012 doing much-needed outreach and cultivating community connections is paying off for the planning period of 2013 as they have already heard from a number of contacts in both Milton and Shelburne about an interest in partnering on stream clean-ups, water quality monitoring and rain garden installations. Hence, they believe that town focus may be best achieved over a two-year rolling basis with the first year dedicated to general outreach and building connections and the second year allowing time to implement identified projects with a stronger volunteer base. Using this model, CCST would move into hands-on project phase with Milton and Shelburne in 2013 and increase outreach and community connections in Essex and Essex Junction in preparation for on-the-ground project implementation in those towns in 2014.

*Timeframe:* Contingent on the goals and timeframes of those goals by the organization.

*Measurable Goals:* The program will engage citizens across an eight-town area in implementing programs to reduce non-point source pollution and stormwater volume at the local level to enable compliance by these MS4 permittees with MM#2. The program will utilize social networking tools

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to form a cadre of concerned citizens and professionals interested in hands-on activities to reduce the harmful effects of stormwater. The program will then organize a series of events and workshops to engage the Stream Team members and citizens at large in discussion and use of key Best Management Practices designed to address the negative effects of stormwater. The scope of services for the CCST is as follows:

1. Regular Tasks:

- Maintain Facebook page with regular postings;
- Maintain website with up to date information on stormwater related workshops and projects sponsored by CCST as well as other partners;
- Recruit and maintain volunteers from member communities, recruit neighborhood leaders to help spread the word and build esprit de corps by articulating the mission and vision of CCST, staying in touch with volunteers and keeping it fun!
- Organize quarterly Steering Committee meetings and communicate with members between meetings.
- Build relationships with and leverage expertise from other organizations working on water quality issues (i.e. Friends of the Winooski, Winooski Natural Resources Conservation District, Lake Champlain Committee, Green Up Day, Lake Champlain Basin Program) including potential joint sponsorship of workshops and projects.

2. Event-driven tasks

- Host a Spring kickoff event to get neighborhood leaders in touch with one another and excited about the upcoming field season;
- Hold outreach events at spring farmers' markets or other spring/early summer events in three municipalities per year to continue to reach new volunteers;
- Complete three workshops or projects in each year with at least one event in each of the areas of the full members over the five year permit period;
- Provide guidance to volunteers on techniques and materials they can use to host their own projects or workshops.

3. Annual Tasks

- Prepare an annual summary including the number of events, number of participants and other measureable quantities showing how CCST met the MM-#2 requirements that members can use in their annual reports to Vermont ANR.

*Person(s) Responsible for BMP:* The CCST.

*Rationale for Selection:* The CCRPC is creating a program to support and extend the stormwater mitigation efforts in the County's impaired waters. The CCRPC believes that their pilot project implemented from Spring 2010 through Spring 2011 was a success. They feel they can carry that momentum with a designated stormwater program.

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### 3.3 Minimum Measure #3 – Illicit Discharge Detection and Elimination

- 1) **BMP # 1:** A plan to detect and eliminate all illicit discharges will be developed, implemented and enforced as part of the SWMP.

*Status:* Completed. A complete SWMP was submitted in April, 2008 for Vermont Agency of Natural Resources (VT. ANR) review, and subsequently approved. The complete SWMP has been reviewed and updated as part of the General Permit 3-9014 (2012) conditions.

*Timeframe:* The SWMP will be reviewed and updated (as required) by December 31<sup>st</sup> of each year.

*Measurable Goals:* Measurable goals of this BMP as outlined in the 2003 NOI, 2008 NOI, and status of these goals are as follows:

- 1) BTV will review and update the SWMP each year.

The Stormwater Pollution Prevention Plan (SWPPP), which is a component of the BTV's SWMP, was updated on April 1, 2012 to reflect re-authorization of General Permit 3-9003 (MSGP) dated August 4, 2012 and submitted for DEC review.

The SWPPP was again updated on April 1, 2013 to reflect the construction of one new BMP covered under Underground Injection Control (UIC) Permit #6-0117 (Aircraft Deicing Fluid Treatment System, 890 Ramp).

No major revisions to the SWMP other than updating the SWPPP were required as noted.

- 2) BTV will complete outfall monitoring as outlined in the monitoring schedule contained in the SWPPP (see SWMP – Volume 2).

BTV has completed outfall monitoring in accordance with the SWPPP for the 2012 – 2013 de-icing season.

- 3) BTV will conduct annual trainings for airport staff and tenants.

BTV previously sent three (3) employees to the municipal employee training workshop held on September 27, 2012. BTV will continue to send employees to the training workshops held during the permit period.

*Person(s) Responsible for BMP:* The Burlington International Airport's illicit discharge detection and elimination plan, and each of the associated activities, will be implemented and overseen by the **Stormwater Management Program Manager**, who is responsible for the

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overall coordination of the storm water management program at the airport. BTV's Stormwater Management Program Manager is Heather Kendrew, P.E., Director of Maintenance, Engineering & Environmental Compliance.

*Rationale for Selection:* Development and implementation of a plan to detect and eliminate illicit discharges, as well as continuation of the ongoing BTV stormwater study program, are paramount to meeting and achieving the goals outlined in the MS4 General Permit.

- 2) BMP # 2:** Attendees at weekly BTV security badging training sessions will be provided educational information, provided by the BTV Operation's staff, on stormwater pollution awareness and water quality issues as they affect the BTV facility.

*Status:* The educational information content including slide(s) and discussion have been developed to date.

*Timeframe:* The educational information content including slide(s) and discussion has been developed. The additional educational information is currently being incorporated into the training content.

*Measurable Goals:* BTV will document the number of newly badged individuals who have received the educational information.

*Person(s) Responsible for BMP:* The Burlington International Airport's illicit discharge detection and elimination program and each of the associated activities will be implemented and overseen by the **Stormwater Management Program Manager**, who is responsible for the overall coordination of the storm water management program (SWMP) at the airport.

*Rationale for Selection:* Providing education on stormwater pollution awareness and water quality issues affords prospective employees and tenants with knowledge of how the BTV site is interconnected with the surrounding environment, and in what way can their actions have a direct impact on that environment.

### **3.4 Minimum Measure #4 – Construction Site Runoff Control**

- 1) BMP # 1:** A plan to prevent or reduce pollutants in construction site runoff will be developed, implemented and enforced as part of the SWMP.

*Status:* Completed. The Construction Site Runoff Control Plan is contained in SWMP, Volume 1 – Section 6.

*Timeframe:* The SWMP will be reviewed and updated (as required) by December 31<sup>st</sup> of each year.



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*Measurable Goals:* All new projects will be covered by the applicable State stormwater permit and/or conform to BTV policy.

*Person(s) Responsible for BMP:* The Burlington International Airport's construction site runoff control plan and each of the associated policies will be implemented and overseen by the **Stormwater Management Program Manager**, who is responsible for the overall coordination of the storm water management program at the airport.

*Rationale for Selection:* Development and implementation of a plan to prevent or reduce pollutants in construction site runoff, including compliance with the ANR CGP, is the most effective way to ensure appropriate protection of waters of the state during construction activities.

### **3.5 Minimum Measure #5 – Post-Construction Runoff Control**

- 1) BMP # 1:** A plan to prevent or reduce pollutants in post-construction site runoff will be developed, implemented and enforced as part of the SWMP.

*Status:* Completed. The Post-Construction Runoff Control Plan is contained in SWMP, Volume 1 – Section 7.

*Timeframe:* The SWMP will be reviewed and updated (as required) by December 31<sup>st</sup> of each year.

*Measurable Goals:* 1) All new projects will be covered by the applicable State stormwater permit and/or conform to BTV policy.

In order to identify projects that may require an operational Stormwater Discharge Permit, the following processes have been followed:

- Meet with VT ANR Stormwater Section personnel to discuss and review the project during design phase.
- Follow direction or finding(s) provided by VT ANR Stormwater Section personnel as to whether or not an operational Stormwater Discharge Permit is required.
- Document direction or finding(s) in meeting notes or meeting minutes.

*Person(s) Responsible for BMP:* The Burlington International Airport's post construction runoff control plan and each of the associated policies will be implemented and overseen by **Stormwater Management Program Manager**, who is responsible for the overall coordination of the storm water management program at the airport.

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*Rationale for Selection:* Development and implementation of a plan to prevent or reduce pollutants in post-construction site runoff, including compliance with the ANR Stormwater Rule, is the most effective way to ensure appropriate protection of waters of the state following the completion of construction activities.

### **3.6 Minimum Measure #6 – Pollution Prevention/Good Housekeeping for Municipal Operations**

**1) BMP # 1:** A plan to ensure good housekeeping practices and pollution prevention will be developed, implemented and enforced as part of the SWMP. The plan will be developed and implemented such that it also meets the requirements of the SWPPP as outlined in the MSGP.

*Status:* Completed. The Burlington International Airport is a non-traditional MS4 and it has coverage under the NPDES Phase II Multi Sector General Permit (MSGP). One condition under the MSGP is development of a Storm Water Pollution Prevention Plan (SWPPP) that includes measures for pollution prevention and good housekeeping. BTV has included the SWPPP as Volume 2 of the SWMP to meet the requirements of this BMP. As previously discussed, the SWPPP was revised and updated by Stantec in 2011 and 2012. The SWMP has been reviewed and updated as part of the General Permit 3-9014 (2012) conditions.

*Timeframe:* The SWMP will be reviewed and updated (as required) by December 31<sup>st</sup> of each year.

*Measurable Goals:* Annually, all catch basins will be inspected and cleaned if necessary. In the event that a catch basin with a standard sump depth of 24" is inspected and found to contain greater than 12" depth of sediment, a recommendation will be made to clean out the sump.

*Person(s) Responsible for BMP:* The Burlington International Airport's pollution prevention and good housekeeping plan and each of the associated policies will be implemented and overseen by **Stormwater Management Program Manager**, who is responsible for the overall coordination of the storm water management program at the airport.

*Rationale for Selection:* Development and implementation of a plan to prevent or reduce pollutants in site runoff and encourage good housekeeping and pollution prevention practices is the most effective way to ensure appropriate protection of waters of the state.

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## **4.0 Stormwater Management Program (SWMP)**

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As a permit condition, each MS4 must develop, implement and enforce a Stormwater Management Program (SWMP) designed to reduce the discharge of pollutants from the MS4. The SWMP will promote construction site runoff control, post construction runoff control and pollution prevention and good house keeping.

BTV has developed a SWMP to meet these requirements, and will continue to review and update the plan annually if necessary. The Stormwater Pollution Prevention Plan (SWPPP) was revised and updated by Stantec in 2011 and 2012. No major updates to the SWMP other than updating the SWPPP were required for 2012.

As a condition of the newly issued General Permit 3-9014 (2012) for Stormwater Discharges from Small Municipal Separate Storm Sewer Systems (MS4) as issued on December 5, 2012 BTV is required to update the SWMP and submit a new NOI with 180 days of the issue date or June 3, 2013. This narrative and attached NOI serves as BTV's request for coverage under the newly issued General Permit 3-9014 (2012). An updated SWMP is included with this submittal for DEC review.

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## **5.0 Reporting**

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### **5.1 Reporting Condition V.C.**

BTV will submit Annual Reports as required under this section for review by VT ANR. Annual Reports will be submitted by April 1 of each year during the effective permit period.

### **5.2 Reporting Condition V.C.1.**

Annual Reports will include the status of the BTV's compliance with permit conditions, an assessment of the appropriateness of the identified best management practices, progress towards achieving implementation of BMPs necessary to meet TMDL requirements and progress towards achieving the statutory goal for the six minimum measures of reducing the discharge of pollutants to the maximum extent practicable (MEP), and the measurable goals for each of the minimum control measures and TMDL implementation measures.

### **5.3 Reporting Condition V.C.2.**

Annual Reports will include results of information collected and analyzed, if any, during the reporting period, including monitoring data used to assess the success of the program at reducing the discharge of pollutants to the MEP.

### **5.4 Reporting Condition V.C.3.**

Annual Reports will include a summary of the stormwater activities BTV plans to undertake during the next reporting cycle including an implementation schedule.

### **5.5 Reporting Condition V.C.4.**

Annual Reports will include proposed changes to BTV's SWMP, including changes to any BMP's or any identified goals that apply to the program elements.

### **5.6 Reporting Condition V.C.5.**

Annual Reports will include notice that BTV is relying on another entity to satisfy some of the permit obligations, if applicable.



Attachment A: Selected Minimum Control Measures

BMP ID	Public Education	Responsible Dept. or Person	Measurable Goal
1-1	Maintain SW website	Chittenden County Regional Stormwater Education Program (RSEP)	See Narrative Attached to this NOI.
1-2,3,4	Participate in RSEP, other regional SW ed. strategy, or submit individual plan	BTV - Heather Kendrew, P.E. Director of Maintenance, Engineering, and Environmental Compliance	See Narrative Attached to this NOI.
1-5a	Develop or acquire informational brochures	Chittenden County Regional Stormwater Education Program (RSEP)	See Narrative Attached to this NOI.
1-5b	Distribute SW brochures 2x in first year and 1x in subsequent years	Chittenden County Regional Stormwater Education Program (RSEP)	See Narrative Attached to this NOI.
1-5c	Seek local news media to run at least 2 news or feature stories per year	Chittenden County Regional Stormwater Education Program (RSEP)	See Narrative Attached to this NOI.
1-5d	For municipalities: Develop school materials and teacher trainings	Chittenden County Regional Stormwater Education Program (RSEP)	See Narrative Attached to this NOI.
1-5e	For non-traditionals: Develop public ed campaign for facility users	Chittenden County Regional Stormwater Education Program (RSEP)	See Narrative Attached to this NOI.

Attachment A: Selected Minimum Control Measures

BMP ID	Public Participation	Responsible Dept. or Person	Measurable Goal
2-9	Participate in the Stream Team or other regional SW participation program, or submit individual plan	BTV - Heather Kendrew, P.E. Director of Maintenance, Engineering, and Environmental Compliance	See Narrative Attached to this NOI.
Implement a program that includes at least 3 of the following:			
2-1	Form a citizen SW advisory panel		
2-2	Establish or support a WQ monitoring program involving citizen volunteers		
2-3	Institute an on-going public workshop series on SW awareness		
2-4	Institute a continuing storm drain stenciling project	BTV - Heather Kendrew, P.E. Director of Maintenance, Engineering, and Environmental Compliance	See Narrative Attached to this NOI.
2-5	Sponsor periodic community stream corridor clean-up days		
2-6	Establish and support a citizen "stormwater watch" group		
2-7	Create or support an "adopt-a-stream" program		
2-8	Undertake a program similar in content and scope to the above with permission of Secretary		

Attachment A: Selected Minimum Control Measures

BMP ID	Illicit Discharge Detection & Elimination	Responsible Dept. or Person	Measurable Goal
3-1	Develop and enforce a program to detect and eliminate illicit discharges	BTV - Heather Kendrew, P.E. Director of Maintenance, Engineering, and Environmental Compliance	See Narrative Attached to this NOI.
3-2	Develop and maintain storm sewer GIS or AutoCAD map	BTV - Heather Kendrew, P.E. Director of Maintenance, Engineering, and Environmental Compliance	See Narrative Attached to this NOI.
3-3	Develop and enforce illicit discharge ordinance	BTV - Heather Kendrew, P.E. Director of Maintenance, Engineering, and Environmental Compliance	See Narrative Attached to this NOI.
3-4	Develop and implement illicit discharge detection plan, focus on impaired waters and random dumping	BTV - Heather Kendrew, P.E. Director of Maintenance, Engineering, and Environmental Compliance	See Narrative Attached to this NOI.
3-5	Inform public of illicit discharge and disposal hazards	BTV - Heather Kendrew, P.E. Director of Maintenance, Engineering, and Environmental Compliance	See Narrative Attached to this NOI.
3-6	Address specific categories of illicit discharges, if necessary	BTV - Heather Kendrew, P.E. Director of Maintenance, Engineering, and Environmental Compliance	See Narrative Attached to this NOI.
3-7	Prepare annual report of monitoring and corrective actions taken	BTV - Heather Kendrew, P.E. Director of Maintenance, Engineering, and Environmental Compliance	See Narrative Attached to this NOI.

Attachment A: Selected Minimum Control Measures

BMP ID	Construction Site Runoff Control	Responsible Dept. or Person	Measurable Goal
4-1	Develop and implement procedures to ensure MS4 construction activities are properly permitted	BTV - Heather Kendrew, P.E. Director of Maintenance, Engineering, and Environmental Compliance	See Narrative Attached to this NOI.
4-2	Review existing MS4 regulations for effectiveness in managing construction-related E&S and consistency with state construction permit	BTV - Heather Kendrew, P.E. Director of Maintenance, Engineering, and Environmental Compliance	See Narrative Attached to this NOI.
4-2a	Adopt E&S requirements that are at least as stringent as state requirements	BTV - Heather Kendrew, P.E. Director of Maintenance, Engineering, and Environmental Compliance	See Narrative Attached to this NOI.
4-3	Develop and implement an erosion control ordinance that regulates development not subject to state permitting	BTV - Heather Kendrew, P.E. Director of Maintenance, Engineering, and Environmental Compliance	See Narrative Attached to this NOI.



Attachment A: Selected Minimum Control Measures

BMP ID	Post Construction Runoff Control	Responsible Dept. or Person	Measurable Goal
5-1	Review existing MS4 regulations for effectiveness in managing stormwater runoff and consistency with state operational permit	BTV - Heather Kendrew, P.E. Director of Maintenance, Engineering, and Environmental Compliance	See Narrative Attached to this NOI.
5-1a	Assess changes to regulations to support LID	BTV - Heather Kendrew, P.E. Director of Maintenance, Engineering, and Environmental Compliance	See Narrative Attached to this NOI.
5-1b	Assess changes to regulations to minimize impervious surface through street & parking lot design	BTV - Heather Kendrew, P.E. Director of Maintenance, Engineering, and Environmental Compliance	See Narrative Attached to this NOI.
5-1c	Adopt requirements that are at least as stringent as state requirements	BTV - Heather Kendrew, P.E. Director of Maintenance, Engineering, and Environmental Compliance	See Narrative Attached to this NOI.
For development and redevelopment that disturbs $\geq 1$ acre but is not subject to state permitting:			
5-2	Develop and implement procedures to identify the development	BTV - Heather Kendrew, P.E. Director of Maintenance, Engineering, and Environmental Compliance	See Narrative Attached to this NOI.
5-3	Develop and implement an ordinance that regulates the development	BTV - Heather Kendrew, P.E. Director of Maintenance, Engineering, and Environmental Compliance	See Narrative Attached to this NOI.
5-4	Develop and implement inspection procedures for the development	BTV - Heather Kendrew, P.E. Director of Maintenance, Engineering, and Environmental Compliance	See Narrative Attached to this NOI.
5-5	Develop and implement procedures to ensure MS4 development activities are properly permitted	BTV - Heather Kendrew, P.E. Director of Maintenance, Engineering, and Environmental Compliance	See Narrative Attached to this NOI.

Attachment A: Selected Minimum Control Measures

BMP ID	Pollution Prevention & Good Housekeeping	Responsible Dept. or Person	Measurable Goal
6-1	Describe operation and maintenance program for reducing pollutant runoff from MS4 operations, including, at a minimum:	BTV - Heather Kendrew, P.E. Director of Maintenance, Engineering, and Environmental Compliance	See Narrative Attached to this NOI.
6-1a	New construction and land disturbance	BTV - Heather Kendrew, P.E. Director of Maintenance, Engineering, and Environmental Compliance	See Narrative Attached to this NOI.
6-1b	Maintenance of fleet and buildings, all municipal garages, parks, open space, construction and maintenance practices for gravel backroads, snow disposal and stormwater systems	BTV - Heather Kendrew, P.E. Director of Maintenance, Engineering, and Environmental Compliance	See Narrative Attached to this NOI.
6-1c	Training, maintenance schedules, and inspection procedures for long term structural controls	BTV - Heather Kendrew, P.E. Director of Maintenance, Engineering, and Environmental Compliance	See Narrative Attached to this NOI.
6-1d	For municipal facilities where fertilizers are applied, prohibit the use of fertilizers containing phosphorus (unless warranted by a soil test)	BTV - Heather Kendrew, P.E. Director of Maintenance, Engineering, and Environmental Compliance	See Narrative Attached to this NOI.
6-2	For Municipal garages, an MS4 may participate in ANR's Municipal Compliance Assistance Program	BTV - Heather Kendrew, P.E. Director of Maintenance, Engineering, and Environmental Compliance	See Narrative Attached to this NOI.
6-3	Provide a list of all industrial facilities that the MS4 owns or operates that are subject to the MSGP	BTV - Heather Kendrew, P.E. Director of Maintenance, Engineering, and Environmental Compliance	See Narrative Attached to this NOI.



