



May 22, 2019

Attn: Mr. Thomas Skebey, Director of Code Enforcement
City of Elmira Inspection Services Department
101 West Second Street
Elmira, New York 14901

**Re: SWPPP Acceptance - Hilliard Corporation Expansion
Third Street, City of Elmira**

Mr. Skebey:

I have completed a review of the following submitted information for the above-referenced project regarding the Stormwater Pollution Prevention Plan (SWPPP) and stormwater management system design for that project.

- Project Drawings for Hilliard Corporation Expansion, Elmira, New York, Prepared by Fagan Engineers, Revision dated May 21, 2019, Received May 22, 2019, Stamped by a licensed professional engineer
- Stormwater Pollution Prevention Plan (SWPPP) for Hilliard Expansion, Prepared by Fagan Engineers, Revision dated May 20, 2019, Received May 22, 2019, Stamped by a licensed professional engineer
- Response letter from Fagan Engineers, dated May 20, 2019, regarding input from a May 16, 2019 meeting with the Chemung County Stormwater Coalition

Upon review of the above submitted information, I believe that the SWPPP and stormwater management system are acceptable. This acceptance is conditioned upon the following items.

1. One set of final approved Stormwater Pollution Prevention Plan (including one set of the approved Site Engineering Drawings), with the executed approval stamp of the Chemung County Stormwater Coalition, must be on-site at all times during construction until complete site stabilization.
2. This acceptance pertains only to stormwater drainage and management facilities. It is incumbent upon the Applicant to obtain all necessary regulatory approvals and permits.
3. Upon completion of the proposed site construction (including the stormwater collection and management systems), a licensed design professional (on behalf of the developer) shall provide a certification letter to the City of Elmira's Director of Code Enforcement (copied to the Chemung County Stormwater Coalition), stating that the project was constructed in conformance with the approved plans and specifications. Deviations from the approved plans should be noted. Also, these changes should be noted in the plans and a copy of these plans provided to the City.

4. Prior to the start of construction, it is requested that the Applicant arrange a meeting with the City of Elmira's Director of Code Enforcement, the Chemung County Stormwater Coalition, and the Applicant's design professionals, to discuss requirements associated with the SWPPP and SPDES permit.
5. To maintain the existing Hydrologic Soil Group rating for disturbed areas proposed to be vegetated, Soil restoration shall be completed in conformance with NYSDEC's document entitled Deep-Ripping and Decompaction, April 2008 and Table 5.3 of the NYS Stormwater Management Design Manual.
6. Silt, sediment, and/or dust shall not be allowed to leave the project site, including tracking onto public streets. Furthermore, silt and sediment shall not be directed to the proposed stormwater infiltration system. Erosion and sediment controls, outlined in the accepted Erosion & Sediment Control Plan, shall be implemented and maintained to ensure this purpose. If silt, sediment, and/or dust are found to be leaving the site or being directed to the stormwater infiltration system, the Owner (or their contractor) shall take immediate actions to correct the situation.
7. It is imperative that silt and sediment not be directed to the proposed infiltration systems, as the performance of the infiltration capacity of this basin could be negatively impacted. Furthermore, compaction and/or smearing of the soils within the infiltration system shall be avoided, as these can result in a reduction of the infiltration capacity.
8. Appropriate erosion and sediment control measures shall be implemented at any off-site spoils area, where cut from the project site shall be placed and stockpiled. These measures shall be consistent with the New York State Standards and Specifications for Erosion and Sediment Control. The Erosion & Sediment Control Plan shall be amended, if off-site soil stockpile areas are proposed to be utilized for this project.
9. Based upon the submitted design information within the SWPPP, each of the proposed stormwater infiltration systems (including the proposed rain garden) shall have the capacity to accommodate the peak stormwater flow rates and volumes for storm return periods up to and including the 100-year storm event, without overflows.
10. During soils testing, "limiting layers" were identified in the area of the proposed StormTech infiltration system that include a concrete floor at 6 feet deep, a stone foundation at 3 feet deep, and construction and demolition debris. As per the submitted plans, these "limiting layers" shall be removed and replaced with a gravel soil. The infiltration rate of this imported soil shall be equal or greater than the design infiltration rate used for the design of this facility. The infiltration rate of this imported soil shall be confirmed via the design engineer, after the placement of this soil, and reported to the City, prior to the installation of the StormTech system.
11. In regards to the proposed rain garden, an 18-inch layer of "soil media" is proposed to be installed over the area of the rain garden. The infiltration rate of the "soil media" shall be equal or greater than the design information rate used for the sizing of this facility. The infiltration rate of the "soil media" shall be confirmed via the design engineer, after the placement of this soil, and reported to the City, prior to the installation of the rain garden.
12. In regards to the loading dock and adjacent area, as per Table 4.3 of the NYS Stormwater Management Design Manual, outdoor loading/unloading facilities are deemed a hotspot land use. As such, stormwater runoff from hotspots cannot be allowed to infiltrate untreated into groundwater. As per input from the design engineer, the proposed loading dock should not be considered a hotspot because the only material to be stored within the proposed building shall be paper products. Provisions shall be included in the O & M Agreement that address the potential of the proposed loading dock becoming a hotspot at some point in the future. For example, if materials with the potential of being a pollutant source for stormwater runoff are loaded/unloaded at this loading dock, additional stormwater management treatment measures would be provide that targets the pollutant in question.

13. A formal, signed enforceable maintenance agreement for the stormwater management system shall be provided by the Applicant/Owner, accepted by the City, and executed by the Applicant, prior to the issuance of the Certificate of Occupancy for this project. This agreement shall be binding on all subsequent landowners and recorded in the office of the County Clerk as a deed restriction on the property. That agreement must be fully consistent with the City's Stormwater Management and Erosion and Sediment Control Ordinance and accepted by the City and their attorney. Also, the Applicant shall convey to the City easements and/or rights-of-way to assure access for periodic inspections by the City or their representatives.

The maintenance agreement shall include a detailed operation & maintenance plan that has specific provisions for the long-term maintenance of the stormwater management system, to ensure the long-term performance of the stormwater management systems. This agreement, as well as the Operation & Maintenance Plan, shall be subject to the review and approval of the City of Elmira, their attorney, and Chemung County Stormwater Coalition.

In regards to the proposed stormwater infiltration systems, a detailed O & M Plan should be developed that includes (but not be limited to) the following items.

- i. Specific operation and maintenance tasks
- ii. Monitoring requirements (including frequency)
- iii. Frequency and thresholds of maintenance activities

Like other stormwater infiltration systems, the proposed drywells, rain garden, and StormTech system have an effective life span, after which the repair and/or replacement of these systems would be needed. A number of factors impact the effective life of an infiltration system, including the nature of the existing soils, the nature and amount of solid particulates discharged to the system, and the degree of maintenance. Maintenance of the proposed infiltration systems will be critical to the long-term performance and effective life of these systems.

14. A PDF of the approved plans and SWPPP shall be directed from the applicant to the City of Elmira's Director of Code Enforcement and to this office for our digital records.

If you have any questions or comments regarding this letter, please do not hesitate to contact me. Furthermore, I would be happy to meet to discuss this project in greater detail.

Sincerely,



Jimmie Joe Carl, P.E.

Cc: Andrew Avery, P.E., City of Elmira
Jacob Coles, City of Elmira
Rick Vary, City of Elmira
Fagan Engineers