



851 Chemung Street
Horseheads, New York 14845

November 28, 2018

Mr. Tom Skebey, Stormwater Management Officer
City of Elmira
101 W. Second Street
Elmira, NY 14901

RE: Cultural Connector Reconstruction Project
Elmira, NY
Cursory review of Stormwater Pollution Prevention Plan (SWPPP)

Mr. Skebey,

I have completed a review for the following submitted information for the above referenced project regarding the Stormwater Pollution Prevention Plan for that project:

- SWPPP Report for Construction Activities Associated with the North Main Street Cultural Connector Reconstruction Project, Prepared by Fisher Associates, FA No.:161006, not stamped by a Professional Engineer, received November 8, 2018.

Upon review of the above information I have the following comments:

1. The SWPPP and Notice of Intent state that all stormwater discharges to a combined sewer. This is true for only a small portion of the project. Most of the project discharges to a storm sewer that directly discharges to the Chemung River. The Notice of Intent and language within the SWPPP should be corrected to accurately depict stormwater runoff conditions.
2. The SWPPP states that Post Construction Controls are not necessary because the project does not alter pre-construction hydrology. DEC Frequently Asked Questions Version 2.0 dated October 7, 2004, No. 27 specifically discusses the stormwater requirements for reconstruction of linear/transportation projects. It is recommended that the consultant review this document and confirm that the project meets the stormwater requirements set forth.

3. Contractor Staging Area- This area was not defined within the SWPPP. The staging area needs to have an erosion and sediment control plan as well as a pollution prevention plan developed prior to the start of the project. Usually staging areas house materials that could potentially be toxic to the environment such as gas, diesel, hydraulic fluid, etc.
4. Concrete washout- concrete curbs and sidewalks will be poured for this project. A concrete washout is required for every permitted site in NYS. The standard for this can be located in the NYS Standards and Specifications for Erosion and Sediment Control. The SWPPP should be updated with this information and the location of the washout area should be identified.
5. No detail was provided for the Excavated Drop Inlet Protection in the SWPPP. Please provide said detail to ensure contractor follows the NYS standard for this practice.
6. Street sweeping/vacuuming- Much of the site will be under construction for close to a year. Traffic will be driving through the project and potentially tracking dirt, debris and mud onto roads that are not part of the project. It is recommended that a plan be developed for daily removal of this material from the road and curbs to prevent it from getting into the storm sewer system.

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

Sincerely,



Jessica Verrigni, CPESC, CPSWQ

Cc- Andrew Avery, P.E., Chemung County Public Works Department
Jimmie Joe Carl, P.E., Chemung County Stormwater Coalition
Roger O'Toole, Chemung County Public Works Department
Fisher Associates