

Exhibit 27

Pollution Prevention and Good Housekeeping for Municipal Operations

Pollution Prevention Philosophy

The following basic principles are intended to reduce pollution, increase efficiency, and reduce cost for Municipal Operations.

- *Prevent Pollution at its Source*

Controlling pollutants at their source and preventing their wider release is more valuable, efficient and cost-effective than removing them from stormwater runoff or implementing other water treatment options after the fact. Every attempt should be made to remove or capture contaminants before stormwater contact.

- *Manage Clean Water Runoff and Minimize Pollutant Exposure to Clean Water*

Prevent clean water runoff and precipitation from contacting potential pollutants and prevent mixing of clean water (runoff) with polluted flows.

- *Minimize Use of Potential Pollutants*

Examine municipal use of all chemicals and other potential pollutants and identify methods of eliminating, reducing or better targeting their use in municipal operations and facilities.

- *Plan and Prepare for Spills and Accidents*

Develop spill prevention and response policies and procedures for all facilities that use or store chemicals.

- *Practice Preventive Maintenance*

Regularly inspect components of stormwater collection, conveyance and treatment systems; regularly inspect machinery, pipes, storage tanks and other equipment for leaks or worn parts; regularly calibrate application equipment; and plan for system upgrades and component replacements and repairs.

- *Identify Potential Pollution Sources*

Identify municipal facilities and operations that could impact stormwater quality. Identify potential pollution sources at each site or for each activity. Identify, map and inspect the facility's stormwater drainage system.

- *Plan New Facilities to Include Stormwater Pollution Prevention*

Include a stormwater pollution prevention component in all new municipal facilities and activities. Site new facilities to minimize waterbody impacts. Use Best Management Practices when preparing facility plans or major upgrades.

- Improve Data Collection, Mapping, and Records Maintenance

Emphasize improvement of data collection and records maintenance to address higher priority pollution sources and contaminants; improvement of geographic information; and unification of data management across all relevant municipal departments and operations.

- Train Employees

Train employees regarding stormwater pollution and prevention practices. Identify emergency contacts and reporting procedures. Seek employee ideas on pollution prevention methods.

- Improve Communications and Coordination

Emphasize communication and coordination across key municipal departments and operations. Coordinate stormwater and pollution prevention activities with county and state agencies, organizations and institutions, as well as neighboring municipalities. Develop public outreach and citizen participation regarding municipal pollution prevention activities.

Street and Bridge Maintenance

- Street Cleaning Priorities

Streets whose drainage systems that flow into priority water bodies listed below are first priority for cleaning and maintenance:

- 303(d) water bodies;
- Sensitive habitats; and
- Drinking water bodies and their tributaries.

Streets whose drainage systems flow into water bodies and streams that are trout spawning (A(TS), B(TS), or C(TS)) are second priority.

Streets whose drainage systems that flow into water bodies not listed above are third priority.

- Sensitive Ecosystems or Priority Waterbody Considerations

The following waterbodies are listed in the NYS DEC's 303(d) listing for the following pollutants:

- Snyders Lake ó Phosphorus
- Hudson River ó PCBs (reference)

The following waterbodies are drinking water bodies:

- Tomhannock Reservoir (reference)

The following waterbodies are listed as trout spawning:

- Wynantskill Creek
- Mill Creek
- Poestenkill Creek (reference)

- *Pollution Prevention and Streambank Erosion Control in Bridge Maintenance*

The following general measures are to be employed when working in the vicinity of stream beds or bridges:

- Use suspended tarps, booms and vacuums to capture pollutants (e.g. paint, solvents, rust and paint scrapings) generated during bridge maintenance. Ensure that contractors do the same;
- Use the appropriate stormwater and erosion control techniques when doing work along stream banks;
- Seed and mulch after disturbing stream banks;
- Routinely clean scupper drains, especially those that drain directly to surface waters; and
- When rehabilitating a bridge with scupper drains that drain directly to surface waters, retrofit the scupper drains with catch basins or redirect the water to vegetated areas on land.

- *Maintenance of Unpaved and Rural Roads*

For work associated with drainage ditches the following measures are to be considered:

- Open drainage ditches should be inspected annually;
- Ditches should be cleaned out or restored when the ditch is silted in to half its depth, flooding regularly occurs on the road, or additional drainage is needed to maintain the roadway;
- Freshly dug ditches will be seeded. Ditches with a slope greater than ten percent (10%) should have rip-rap or geotextiles installed to prevent erosion and scouring of the ditch;
- Vegetation ditches should be mowed regularly;
- Culverts are to be properly sized to keep ditches drained and reduce scouring and erosion; and
- Culverts should be inspected and cleaned out to avoid clogging, washouts and settlement.

Erosion control can be improved by the implementation of several practices:

- Road banks, ditches, and shoulders should be seeded, if disturbed, once work ends;
- The roadbed should be crowned to encourage water to drain into the ditch and not run down the roadbed;
- Limit disturbed areas;
- Stabilize disturbed areas as soon as practicable;
- Retain vegetation on site, if possible;
- Keep stormwater from running onto site with diversion ditches or other similar methods;
- Retain sediment at work sites by filtering water, using erosion control methods or by using settling ponds; and
- Follow up and inspect recent work. Make sure that all erosion controls are in place and working properly. Make sure that stabilized sites remain stabilized.

Dust control on unpaved roads:

- Calcium chloride or a similar material should be sprayed on the roadbed to control fugitive dust.

Roadside maintenance should consider the following:

- Maintain vegetation by mowing;
- Herbicide should only be used in places where mowing is very difficult to impossible. Use of chemicals such as herbicides and pesticides should be limited near bodies of water.
- Litter control can be increased by encouraging neighborhoods to pick up the litter from roadsides by having an Adopt-A-Road program or by using work force or community groups to remove litter from ditches and along roadways.

Stormwater Drainage, Conveyance and Treatment System Maintenance

- *Priority Determination for Systems and System Components*

Stormwater drainage systems that flow into priority water bodies listed below are first priority for cleaning and maintenance:

- 303(d) water bodies;
- Sensitive habitats; and
- Drinking water bodies and their tributaries.

Stormwater drainage systems that flow into water bodies and streams that are trout spawning (A(TS), B(TS), or C(TS)) are second priority.

Stormwater drainage systems that flow into water bodies not listed above are third priority.

- Inspection of System Components, Record-Keeping and Frequency Tracking

The following general items should be considered when inspecting municipal stormwater systems:

- Records should be kept of all inspections of stormwater drainage facilities;
- A log should be kept of the drainage system inspected, receiving waters, priority of the drainage system, when inspections are made, and the time past between the last inspection of the facility;
- All first priority drainage systems should be inspected at least once a year;
- All second priority drainage systems should be inspected at least once a year;
- All third priority drainage systems should be inspected at least every eighteen months; and
- Drainage systems that appear to require cleanout or maintenance more frequently than expected should be inspected at least every six months.

- Technology Improvements and Installation

In areas where pollution or siltation is shown to be a problem, technological improvements and retrofits should be installed. Tracing problems to their origins and requiring remediation should be used according to the Town's Illicit Discharge Detection and Elimination Policy.

- Maintenance, Repair and Cleanout of System Components

The upkeep of Stormwater Drainage Systems should consider the following:

- At the time of inspection, notation on whether a system required cleanout, regular maintenance or repair should be made. If the system is clogged, filled, eroded or similarly impaired to the point of ineffectiveness or hazard, a notation should be made to have the system cleaned/repared immediately;
- Needed cleanout, maintenance or repair should be the responsibility of the Highway Department. Impaired and hazardous systems should have a high priority;
- Siltation should be removed from wet pond forebays, and ditches when they are fifty percent (50%) filled. Culverts should be cleaned before siltation creates flooding problems;
- Enclosed drains should be cleaned regularly by either flushing or vacuuming; and
- Trash should be regularly collected from grates or grilles.

- Public Education and Communications

The public is key to helping maintain stormwater drainage systems. Maintaining open communication with the public will help in identifying problem systems as well as reducing costs of cleanup by promoting citizen responsibility. Educational articles in local papers and on the Town's website; Public Hearings; public education seminars; and the distribution of informative literature should be used to engaged the public.

Parks, Open Space and Municipal Property Maintenance

The following items should be considered for municipal grounds maintenance:

- *Integrated Pest Management*

The application of integrated pest management controls will be used for minimizing both weed and insect infestation. This control method checks for the variety of weeds and insects that may be creating problems, and using the proper herbicide or insecticide at the proper time to deal with the problem. If no weeds or insect pests are found, no herbicides or insecticides will be used. The Rensselaer County Cooperative Extension will be used to instruct personnel on the use of this method. Records of the application of herbicides and pesticides should be kept by the applicator.

- *Use of Pesticide Alternatives*

Non-chemical and natural pesticide alternatives will be used where such alternatives are reasonably priced and applicable.

- *Fertilizer Use, Alternatives and Reductions*

In an attempt to reduce the application of chemicals, the following should be considered:

- Soils should be tested yearly for areas that require fertilizer use. Only if soil fertility levels are less than optimal should fertilizers be used;
- Fertilizers shall only be used following instructions given on the package, and at rates prescribed to ameliorate soil fertility; and
- Alternatives to chemical fertilizers such as manure, mulches and compost should be used where possible to improve soil fertility.

- *Erosion Control Practices*

For locations subject to higher traffic:

- In areas where grass is worn due to foot traffic, alternatives to grass such as mulch, gravel or a paved path should be used to prevent soil erosion where grass is lacking; and
- In areas of new lawn seeding, hay mulch should be used to maintain moisture and prevent erosion until the new grass is growing.

- *Waste Reduction, Recycling and Litter Control*

The following waste control measures should be considered:

- In remote or low-traffic areas, a Carry-In/Carry-Out waste policy is in effect. Signage indicating this control measure should be posted at access points;

- Trash barrels and waste cans should be located in high-traffic areas to provide facilities for patrons to use. The trash barrels and waste cans will be emptied on a weekly/daily basis as required;
 - In areas where dumping is an issue, signs will be placed reminding the public of fines for dumping and littering; and
 - Recycling containers will be located at high-traffic areas, where practicable.
- Hazardous Materials Storage

In the event that the storage of hazardous materials is required:

- All hazardous materials shall be stored inside, under cover or protective tarp, or in an appropriate bulk tank;
- Aisle space should be wide enough to allow access for inspections and to ease material transport;
- Materials should be stored away from high-traffic areas to reduce the likelihood of accidents that may cause spills or damage to drums, bags or containers;
- Containers should be stacked according to manufacturer's directions to avoid damaging the container or product itself; and
- Containers should be stored on pallets or equivalent structures to facilitate inspection for leaks and prevent containers from coming in contact with wet floors, which can cause corrosion. This also reduces the incidence of damage by pests.

Onsite Septic Systems

For municipal spaces with onsite septic systems, the following shall be implemented:

- Inventory of Existing Septic Systems

An inventory of municipal parks septic systems will be kept on file in the Building Department, listing the property, location on the property, date of installation, size of septic tank, and type of leach field. A copy of plans of the septic systems will be kept with the inventory.

- Inspections and Record Keeping

Each septic system will be inspected biannually by the Building Department. Any odors from the system will be noted. If leachate is visible or the leach field is swampy, corrective actions will be taken. Records of inspections will be maintained with the inventory.

- Pumpouts and Maintenance

The septic systems will be pumped out on a regular basis, depending on size and usage, by qualified personnel. Inspections of the septic tank will be taken at the time of pumpout, and necessary repairs made if necessary.

Animal Waste Management

To minimize the impact of animal waste on municipal grounds, the following shall be considered:

- *Pet Waste Control, Education and Enforcement*
 - Pet owners are required to pick up pet wastes from parks, streets and sidewalks;
 - Signs in parks will remind pet owners of this requirement; and
 - Trash cans in parks will assist pet owners in the removal of pet wastes.

- *Bird Waste Control*
 - DEC and US Fish and Game Office will be contacted when wild birds amass and congregate regularly in areas; and
 - Sidewalks and streets that have accumulated bird droppings will be swept by machine or broom.

- *Domestic Animals (Fairgrounds, Municipal Farms, Equestrian Center)*
 - Domestic animal wastes will be swept up from paved areas such as sidewalks and parking lots;
 - Domestic animal wastes will be stored in an appropriate area in an appropriately constructed manure pit or pile; and
 - Odor control may be necessary for the manure pile or pit.

- *Wildlife*

To prevent waste from wildlife from contaminating stormwater, wildlife shall be discouraged from massing or straying onto public property, especially on public waterfronts or parks. This may be accomplished through non-lethal methods such as use of cannons and dogs, as well as lethal methods.

- *Public Education and Communication*
 - Educational materials such as signs, pamphlets and handouts, as well as communications through newsletters, newspaper articles and billboard ads will be used to communicate the importance of cleaning up after pets; and
 - Newspaper articles and other media communications will be used for informing the public of methods to be used for wildlife removal.

Solid Waste Management

The following solid waste management practices shall be considered:

- Prevention of Illicit Dumping
 - Illicit dumping on Town highways is made illegal in the Illicit Discharge Detection and Elimination Law;
 - Those found dumping, as well as those who are identified by their waste will be fined and their names may be posted in the newspaper or other public place; and
 - Sites with continual dumping may have signs installed informing the public of the illegal nature of dumping. Articles in the newspaper and town's newsletter will also inform readers of the illegality and negative consequences of dumping.

- Litter Control
 - Littering on town highways and town lands is made illegal in the Illicit Discharge Detection and Elimination Law;
 - Those found littering may be fined or remanded to community service. Those found littering may also have their names posted in the newspaper or other public place;
 - Sites with continual littering may have signs installed informing the public of the illegal nature of littering or of the implications of littering; and
 - Waste bins or barrels at parks and other places should be emptied weekly or more often when full to keep trash in its place.

- Waste Reduction and Recycling
 - Purchase and maintain only the supplies or materials needed, although a bid can set the price for additional materials beyond that purchased;
 - Encourage recycling of paper and other materials;
 - For offices, print double-sided and cull mailing lists to save paper; and
 - Encourage the use of washable dishware and cups/mugs in the lunchroom instead of paper plates and Styrofoam cups.

- Hazardous Waste Collection (including from Municipal Buildings)
 - Municipally generated hazardous waste will be disposed of in a legal, appropriate fashion;
 - Hazardous waste will be properly stored inside where the waste will be labeled properly; and
 - Hazardous waste will be removed by a hauler licensed to haul hazardous substances to a facility that is licensed to either recycle or dispose of hazardous waste substances.

Streambank Stabilization and Hydrologic Habitat Modification

The following general items shall be considered during the design or implementation of projects or work near streams or other hydrologically sensitive areas:

- Priority Setting for Streambank Stabilization Projects
 - First priority for streambank stabilization projects will be for areas where life or property, including roadways, is at risk from erosion or flooding from siltation;
 - Second priority for streambank stabilization is where important habitats or other ecological importance is threatened due to erosion or siltation;
 - Third priority for streambank stabilization is where situation threatens hydro facilities or threatens dam workings or bridges; and
 - Fourth priority for streambank stabilization is any need not listed above.

- Opportunities for Alternative, Soft-Engineering Approaches for Erosion Control

When possible, use of soft-engineered approaches for erosion control should be used, such as plantings of osiers, use of geotechnical materials and other proven methods to stabilize stream and water body banks.

- Priority Setting for Sediment Removal and Pond Maintenance
 - Sediments must be removed from stormwater detention pond forebays when the forebays are half full; and
 - Sediment should be removed on a scheduled basis, preferably before it becomes necessary as specified by the item above.

- Opportunities for Hydrologic Habitat Improvements
 - Naturally occurring and man-made lakes and ponds that have a significant sedimentation problem should be investigated as to whether a sedimentation forebay should be constructed at major stream inlets or at stream areas and stormwater outfalls that are growing deltas; and
 - Careful removal of sedimentation from wetlands that are becoming silted in should be investigated.

- Application of Fluvial Geomorphic Assessments in Erosion Control Projects
 - Natural flooding and flood plains should be taken into account in erosion control projects; and
 - Erosion control projects should not increase flooding upstream.

- Opportunities for Community Sponsored Volunteer Stream Walks
 - Similar to the Adopt-a-Highway program, volunteer stream walks and adoption of streams and other water bodies will be encouraged as a method of improving the hydric environment; and
 - Use of required stream clean up as part of the sentence of littering or other improper disposal method shall be considered.

Personnel Training, Documentation and Scope

The Town has developed a training matrix for relevant municipal employees. More specifically, this includes members of the Highway Department, Utilities Department, and Building Department associated with field or site services or inspections. For each training session, the Title, Date, and Scope of Training as well as a Personnel Sign-in Sheet shall be submitted to the Stormwater Management Officer.

The following Training Matrix has been developed to represent the minimum training requirements for relevant municipal staff.

Training	Scope	Required Departments
North Greenbush's Updated SWMP Plan	A review of the revised SWMP Plan, including formal documentation of SWMP Plan activities	Building Department Highway Department Utilities Department
Four-Hour Erosion and Sediment Control Training	Principals of erosion and sediment control	Building Department (if required, every three years)
Municipal Equipment Maintenance, Fueling and Fuel Storage	BMPs associated with preventing environmental impacts from routine maintenance and fueling of municipal vehicles and equipment and the storage of fuels at municipal facilities	Highway Department
Municipal Property Maintenance	Training and BMPs on clean-up techniques, proper materials storage, chemicals usage, and safety.	Building Department Highway Department Utilities Department
Outfall Inspections	Procedures and guidelines for inspecting or observing outfalls during planned inspections or routine maintenance	Building Department Highway Department Utilities Department
IDDE Program	Principals of the IDDE Program and identifying potential IDDE violations	Building Department Highway Department Utilities Department