



Massachusetts Department of Environmental Protection
Bureau of Resource Protection - Watershed Management

1056
W040966
Transmittal Number

BRP WM 08A NPDES Stormwater General Permit
Notice of Intent for Discharges from Small Municipal Separate Storm Sewer Systems (MS4s)

Facility ID (if known)

A. Instructions

Important:
When filling out forms on the computer, use only the tab key to move your cursor - do not use the return key.



Submission of this Notice of Intent constitutes notice that the entity named at item B1. of this form intends to be authorized by the DEP General Permit issued jointly with EPA for stormwater discharges from the small municipal separate storm sewer system (MS4), in the location identified at item B2. of this form. Submission of the Notice of Intent also constitutes notice that the party identified at item B1. has read, understands and meets the eligibility conditions of Part I.B. of the NPDES Small MS4 General Permit, agrees to comply with all applicable terms and conditions of the NPDES Small MS4 General Permit, and understands that continued authorization to discharge is contingent on maintaining eligibility for coverage. **In order to be granted coverage, all information required on BRP WM 08A, including the Stormwater Management Program Summary and Time Frames form, must be completed. Please read the permit and make sure you comply with all requirements, including the requirement to develop and implement a stormwater management program.**

B. Applicant Information

1. Small MS4 Operator/Owner Information:

Town of Reading - Joseph Delaney, Town Engineer primary contact

Name

16 Lowell Street

Mailing Address

Reading

City/Town

(781) 942-9083

Telephone Number

MA

State

jdelaney@ci.reading.ma.us

Email (if available)

2. Municipality Name

Town of Reading

City/Town

3. Legal Status:

Federal

City/Town

State

Tribal

Private

Other public entity:

Specify Public Entity

4. Other regulated MS4(s) within municipal boundaries:

MassHighway properties, Camp Curtis Guild National Guard Facility

5. Based on the instructions provided in Part I of the NPDES Small MS4 General Permit, have the eligibility criteria for "listed species" and critical habitat been met?

yes

pending

no

JUL 30 2003

MUNICIPAL ASSISTANCE UNIT



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D. Stormwater Management Program Summary

1. Public Education:

<u>1</u> BMP ID #		
Research available public educational materials	See attachments for BMP responsibilities	See attachments for Measurable Goals
<u>2</u> BMP ID #		
Develop a public education plan	Responsible Dept./Person Name	Specify Measurable Goal
<u>3</u> BMP ID #		
Present annual report to Town Meeting	Responsible Dept./Person Name	Specify Measurable Goal
<u>4</u> BMP ID #		
Implement public education plan	Responsible Dept./Person Name	Specify Measurable Goal
<u> </u> BMP ID #		
Specify Best Management Practice	Responsible Dept./Person Name	Specify Measurable Goal

2. Public Participation:

<u>5</u> BMP ID #		
Establish a storm water advisory committee	Responsible Dept./Person Name	Specify Measurable Goal
<u>6</u> BMP ID #		
Comply with public meeting laws for committee meetings	Responsible Dept./Person Name	Specify Measurable Goal
<u>7</u> BMP ID #		
Develop a public involvement /participation plan	Responsible Dept./Person Name	Specify Measurable Goal
<u>8</u> BMP ID #		
Solicit volunteers for public participation plan	Responsible Dept./Person Name	Specify Measurable Goal
<u>9</u> BMP ID #		
If sufficient volunteers are identified, implement plan	Responsible Dept./Person Name	Specify Measurable Goal



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D. Stormwater Management Program Summary (Cont.)

3. Illicit Discharge Detection and Elimination:

<u>10</u> BMP ID #		
<u>Develop outfall map using existing information</u>	_____ Responsible Dept./Person Name	_____ Specify Measurable Goal
<u>11</u> BMP ID #		
<u>Review existing regulations and bylaws</u>	_____ Responsible Dept./Person Name	_____ Specify Measurable Goal
<u>12</u> BMP ID #		
<u>If necessary, develop non-storm water discharge by-law</u>	_____ Responsible Dept./Person Name	_____ Specify Measurable Goal
<u>13</u> BMP ID #		
<u>Develop 3-year plan to identify and eliminate illicit discharges</u>	_____ Responsible Dept./Person Name	_____ Specify Measurable Goal
<u>14</u> BMP ID #		
<u>Implement 3-year illicit discharge detection program</u>	_____ Responsible Dept./Person Name	_____ Specify Measurable Goal

4. Construction Site Runoff Control:

<u>15</u> BMP ID #		
<u>Review existing by-laws and regulations</u>	_____ Responsible Dept./Person Name	_____ Specify Measurable Goal
<u>16</u> BMP ID #		
<u>If necessary, develop erosion control by-law</u>	_____ Responsible Dept./Person Name	_____ Specify Measurable Goal
<u>17</u> BMP ID #		
<u>If necessary, amend existing eroion control regulations</u>	_____ Responsible Dept./Person Name	_____ Specify Measurable Goal
<u>18</u> BMP ID #		
<u>Revise/ resubmit by-law if not approved by Town Meeting</u>	_____ Responsible Dept./Person Name	_____ Specify Measurable Goal
<u>19</u> BMP ID #		
<u>Enforce new bylaw/regulation</u> Specify Best Management Practice	_____ Responsible Dept./Person Name	_____ Specify Measurable Goal



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D. Stormwater Management Program Summary (Cont.)

5. Post Construction Runoff Control:

<u>20</u> BMP ID #		
<u>Review existing by-laws and regulations</u>	_____ Responsible Dept./Person Name	_____ Specify Measurable Goal
<u>21</u> BMP ID #		
<u>If necessary, develop a post-construction runoff by-law</u>	_____ Responsible Dept./Person Name	_____ Specify Measurable Goal
<u>22</u> BMP ID #		
<u>Inventory existing BMP's that are under Town's jurisdiction</u>	_____ Responsible Dept./Person Name	_____ Specify Measurable Goal
<u>23</u> BMP ID #		
<u>Develop five-year O&M plan for Town-owned BMP's</u>	_____ Responsible Dept./Person Name	_____ Specify Measurable Goal
<u>24</u> BMP ID #		
<u>Begin implementation of five-year O&M Plan</u>	_____ Responsible Dept./Person Name	_____ Specify Measurable Goal

6. Municipal Good Housekeeping:

<u>25</u> BMP ID #		
<u>Evaluate Town's current good housekeeping practices</u>	_____ Responsible Dept./Person Name	_____ Specify Measurable Goal
<u>26</u> BMP ID #		
<u>Develop written O&M plan to formalize Town's practices</u>	_____ Responsible Dept./Person Name	_____ Specify Measurable Goal
<u>27</u> BMP ID #		
<u>Implement O&M plan</u>	_____ Responsible Dept./Person Name	_____ Specify Measurable Goal
<u>Specify Best Management Practice</u>		
<u>28</u> BMP ID #		
<u>Street Sweeping</u>	_____ Responsible Dept./Person Name	_____ Specify Measurable Goal
<u>Specify Best Management Practice</u>		
<u>29</u> BMP ID #		
<u>Catch Basin Cleaning</u>	_____ Responsible Dept./Person Name	_____ Specify Measurable Goal
<u>Specify Best Management Practice</u>		



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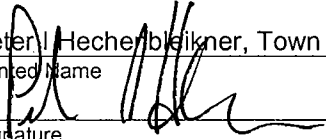
D. Stormwater Management Program Summary (cont.)

~~7. BMPs for Meeting TMDL:~~

<u>30</u> BMP ID #		
Household Hazardous Waste dropoff	_____ Responsible Dept./Person Name	_____ Specify Measurable Goal
<u>31</u> BMP ID #		
Resident used oil dropoff	_____ Responsible Dept./Person Name	_____ Specify Measurable Goal
Specify Best Management Practice		
<u>32</u> BMP ID #		
Recycle Town-generated tires, batteries, scrap metal, used oil	_____ Responsible Dept./Person Name	_____ Specify Measurable Goal
_____ BMP ID #		
_____ Specify Best Management Practice	_____ Responsible Dept./Person Name	_____ Specify Measurable Goal
_____ BMP ID #		
_____ Specify Best Management Practice	_____ Responsible Dept./Person Name	_____ Specify Measurable Goal

E. Certification

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 gather and evaluate 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, I certify that 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.

Peter Hecherbleikner, Town Manager
 Printed Name

 Signature

July 29, 2003
 Date

NPDES PHASE II STORM WATER NOTICE OF INTENT NARRATIVE

APPROACH TO COMPLIANCE

In reviewing the requirements of the NPDES General Permit for Storm Water Discharges from Small MS4s as well as the Storm Water Phase II Final Rule, it has become apparent that there is significant room for interpretation of the regulations by individual municipalities. Also, the voluminous EPA guidance documents establish numerous BMPs that may or may not be implemented by communities. While these guidance documents are well prepared and provide much useful information, there are no specific requirements established within them. Given these considerations, the Town of Reading finds that it is nearly impossible to develop a definitive five-year compliance plan.

What the Town of Reading has attempted to do is establish a broad framework that will ultimately result in compliance with the regulations. For each of the six minimum criteria, the framework generally follows these five guidelines:

1. Evaluate current Town operations with respect to each criteria;
2. Compare current operations with regulatory requirements;
3. Develop plans to close gaps between current operations and regulatory requirements;
4. Implement plans; and
5. Re-evaluate operations after plan implementation.

In following these guidelines, it became very difficult to establish measurable goals for anything beyond the first year or two of the program. For instance, in the construction site runoff control area our first BMP is to review current Town by-laws to determine if we need to pass any new by-laws. After this effort is complete, we may find that we are fully covered and do not need to do anything further. We also may find that there is much further work to do. Therefore, identifying anything beyond the first step is mere speculation. What we expect to happen in the second through fifth years of the program are annual revamping of the measurable goals based on the results of the previous years work.

BEST MANAGEMENT PRACTICES

1. Public Education and Outreach on Storm Water Impacts

- Research available public education materials developed by other municipalities or agencies and tailor for use by the Town of Reading.

Responsible Department: Community Services, Public Works

Measurable Goal: Compilation of education materials

- Develop a public education plan that considers the use of mass mailings, targeted mailings, press releases, web site information, and cable television.

Responsible Department: Community Services, Public Works

Measurable Goal: Development of plan

- Present annual report to Town Meeting.

Responsible Department: Public Works

Measurable Goal: Make presentation

- Implement Public Education program based on the schedules developed in the Public Education Plan.

Responsible Department: Community Services, Public Works

Measurable Goal: Meet schedules identified in plan

2. Public Involvement/Participation

- Establish a Storm Water Management Advisory Committee by either developing a new committee or adding the responsibility to an existing committee.

Responsible Department: General Services, Board of Selectmen

Measurable Goal: Establish committee

- Comply with Public Meeting Laws for the meeting of the advisory committee

Responsible Department: Public Works

Measurable Goal: Keep records of proper posting/advertising

- Develop a Public Involvement/Participation Plan that identifies public involvement opportunities and those groups that should be targeted for involvement/participation. This plan will investigate at a minimum, storm drain stenciling programs and stream cleanups.

Responsible Department: Community Services, Public Works

Measurable Goal: Development of the plan

- Solicit volunteers for the public involvement/participation activities identified in the plan.

Responsible Department: Community Services, Public Works

Measurable Goal: Keep records of organizations contacted

- If sufficient volunteers are identified, implement public involvement/participation plan.

Responsible Department: Community Services, Public Works

Measurable Goal: Keep records of public involvement/participation activities conducted

3. Illicit Discharge Detection and Elimination

- Develop outfall map using existing information

Responsible Department: Public Works

Measurable Goal: Map developed

- Review existing regulations and by-laws to determine if a new by-law is necessary or if existing by-laws or regulations need to be amended to comply with the standard.

Responsible Department: Community Services, Public Works

Measurable Goal: Report on adequacy of existing by-laws

- Based on outfall map, develop a three-year plan to identify and eliminate illicit discharges.

Responsible Department: Public Works

Measurable Goal: Plan developed

- If necessary, develop by-law that prohibits the discharge of non-storm water discharges to the drainage system and bring to Town Meeting for approval.

Responsible Department: Community Services, Public Works

Measurable Goal: If necessary, by-law written and brought to Town Meeting

- If necessary, amend exiting regulations that prohibit non-storm water discharges to the drainage system.

Responsible Department: Community Services, Public Works

Measurable Goal: Regulations amended

- Implement Illicit Discharge Detection and Elimination Program based on schedule identified in the three-year plan subject to Town funding.

Responsible Department: Public Works

Measurable Goal: Complete each phase of the program by the deadline outlined in the three-year plan.

- If Town Meeting does not approve by-law or if the Attorney General's review negates the by-law, revise by-law and bring back to Town Meeting for approval (if necessary).

Responsible Department: Community Services, Public Works

Measurable Goal: By-Law revised and resubmitted to Town Meeting

4. Construction Site Storm Water Runoff Control

- Review existing regulations and by-laws to determine if a new by-law is necessary or if existing by-laws or regulations need to be amended to comply with the standard.

Responsible Department: Community Services, Public Works

Measurable Goal: Summary report of regulatory review prepared

- If necessary, develop an erosion control by-law or modify existing by-law and bring to Town Meeting for approval.

Responsible Department: Community Services, Public Works

Measurable Goal: New by-law brought to Town Meeting

- If necessary, amend existing sediment and erosion control regulations

Responsible Department: Community Services, Public Works

Measurable Goal: Regulations amended

- If Town Meeting does not approve by-law or if the Attorney General's review negates the by-law, revise by-law and bring back to Town meeting for approval (if necessary).

Responsible Department: Community Services, Public Works

Measurable Goal: By-Law revised and resubmitted to Town Meeting

- Enforce new by-law or regulation in accordance with the enforcement procedures established in the regulation or by-law.

Responsible Department: Community Services

Measurable Goal: Keep records of enforcement actions

5. Post-Construction Storm Water Management in New Development and Redevelopment

- Review existing regulations and by-laws to determine if a new by-law is necessary or if existing by-laws or regulations need to be amended to comply with the standard.

Responsible Department: Community Services, Public Works

Measurable Goal: Summary report of regulatory review prepared

- If necessary, develop a post-construction runoff by-law or modify existing by-law and bring to Town Meeting for approval.

Responsible Department: Community Services, Public Works

Measurable Goal: New by-law brought to Town Meeting

- If necessary, amend existing post-construction runoff regulations

Responsible Department: Community Services, Public Works

Measurable Goal: Regulations amended

- Inventory existing Best Management Practices (detention basins, retention basins, drainage ditches, etc.) that are under the jurisdiction of the Town.

Responsible Department: Public Works

Measurable Goal: All BMPs inventoried

- If Town Meeting does not approve by-law or if the Attorney General's review negates the by-law, revise by-law and bring back to Town meeting for approval (if necessary).

Responsible Department: Community Services, Public Works

Measurable Goal: By-Law revised and resubmitted to Town Meeting

- Enforce new by-law or regulation in accordance with the enforcement procedures established in the regulation or by-law.

Responsible Department: Community Services

Measurable Goal: Keep records of enforcement actions

- Develop an Operation and Maintenance (O&M) Plan for the BMPs identified in the inventory that initially established a five-year implementation schedule.

Responsible Department: Public Works, Community Services

Measurable Goal: O&M Plan written

- Implement five-year O&M Plan subject to Town finding

Responsible Department: Public Works

Measurable Goal: O&M activities conducted on BMPs identified in accordance with schedule identified in O&M Plan

6. Pollution Prevention and Good Housekeeping for Municipal Operations

- Evaluate Town's current practices with respect to Pollution Prevention/Good Housekeeping.

Responsible Department: Public Works

Measurable Goal: Report prepared on current Good Housekeeping practices

- Develop a written Operation and Maintenance (O&M) Plan to: formalize current O&M practices; establish a training program, identify new programs that might be necessary; and establish implementation schedules for existing and new programs.

Responsible Department: Public Works

Measurable Goal: O&M Plan developed

- Implement O&M Plan subject to Town funding

Responsible Department: Public Works

Measurable Goal: O&M activities are carried out as identified in the O&M Plan, records of O&M activities kept

- Sweep all Town-owned streets and parking lots once per year subject to Town funding.

Responsible Department: Public Works

Measurable Goal: All streets and parking lots swept, records kept of sweeping operations

- Clean all Town-owned catch basins once per year subject to Town funding.

Responsible Department: Public Works

Measurable Goal: All catch basins cleaned, records of catch basin cleaning kept

- Provide one household hazardous waste drop-off per year subject to Town funding.

Responsible Department: Public Works, Community Services

Measurable Goal: Household hazardous waste drop-off conducted

- Provide used oil drop-off at the Public Works Garage at least 10 hours per week subject to Town funding.

Responsible Department: Public Works

Measurable Goal: Used oil drop-off maintained, records of used oil maintained

- Recycle Town generated tires, car batteries, scrap metal, scrap iron and waste oil subject to Town funding.

Responsible Department: Public Works

Measurable Goal: Identified materials recycled, records kept