



04 JUN - 3 2004

## NPDES PII Small MS4 General Permit Annual Report

**Municipality/Organization:** City of Attleboro, Massachusetts  
**EPA NPDES Permit Number:** MAR041087  
**MADEP Transmittal Number:** W-040422  
**Annual Report Number:** Report No. 1  
**Reporting Period:** May 1, 2003 through April 30, 2004

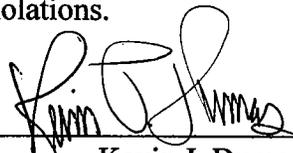
### ***Part I. General Information***

**Contact Person:** Edward M. Tanner  
**Telephone #:** (508) 223-2222

**Title:** Environmental Planner  
**Email:** Conservation@cityofattleboro.us

#### 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, 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.

**Signature:**   
**Printed Name:** Kevin J. Dumas  
**Title:** Mayor  
**Date:** May 28, 2004

## ***Part II. Self-Assessment***

The City of Attleboro has completed the required self-assessment and has determined that our municipality is in compliance with all permit conditions, except for the following provision:

Part II.F Failed to submit annual report on or before May 1, 2004. Submitted on May 28, 2004.

## ***Part III. Summary of Minimum Control Measures***

### **1. Public Education and Outreach**

<b>BMP ID #</b>	<b>BMP Description</b>	<b>Responsible Dept./Person Name</b>	<b>Measurable Goal(s)</b>	<b>Progress on Goal(s) – Permit Year 1 (Reliance on non-municipal partners indicated, if any)</b>	<b>Planned Activities – Permit Year 2</b>
1-1	Article/brochure about stormwater mailed to residents and businesses	Environmental Planner	An article/brochure distributed annually to all residents and businesses and made available at City Hall and the public library.	A stormwater education brochure specific to the City of Attleboro has been designed in conjunction with the Ten Mile River Watershed Stormwater Education Project funded by a \$604b grant from the Massachusetts Department of Environmental Protection (DEP).	The stormwater education brochure will be printed and mailed to city residents in local utility bills during the second quarter (autumn) of Permit Year 2 and Permit Year 4.
	Revised		An article/brochure made available at City Hall and the public library and distributed to all residents and businesses during Permit Year 2 and Permit Year 4.		

1-2	Update City website to include information on stormwater management issues	Environmental Planner / Conservation Commission	City website updated to include information on stormwater management issues.	The City website ( <a href="http://www.cityofattleboro.us">www.cityofattleboro.us</a> ) has been updated to include information and education materials relating to stormwater and non point source pollution. The web site includes the City's Stormwater Management Plan (SWMP) as well as a link to the Ten Mile River Watershed Stormwater Education Project website funded by a \$604b grant from DEP	The stormwater and non point source pollution page of the City website will be maintained and updated with appropriate information throughout the permit term.
1-3	Sponsor cleanup days for rivers and waterbodies within City limits	Department of Public Works / Health Department / Park & Forestry Department	Hold City-sponsored river clean-up day by end of Permit Year 2 and each year thereafter.	Discussions have been held between City staff and several private organizations and neighborhood / school groups to assist with planned cleanup days.	At least one planned cleanup will be conducted along the Ten Mile River or other waterbodies with City sponsorship and/or assistance during Permit Year 2.
Revised		Environmental Planner / Health Department / Department of Public Works	City may provide assistance in the form of labor and disposal equipment but not formal sponsorship.		
1-4	Stormwater education program for school children	Environmental Planner	A presentation given to City middle school(s)	The Environmental Planner has met with the staff responsible for ecology and environmental sciences programs at the high school to develop a program to incorporate stormwater and non point source pollution issues into curriculum. Program will include field visits to Ten Mile River and City's DPW highway yard to view stormwater impacts and potential solutions (see BMP 6-18).	Implement stormwater and non point source pollution curriculum program at high school and/or present stormwater education program to middle / high school during Permit Year 2 and annually throughout the permit term.
Revised			A presentation and/or classroom and field time given to City middle and/or high school(s)		
1-5	Present stormwater management issues to organizations in the City	Environmental Planner	A presentation given to at least one group annually.	The Environmental Planner has presented information related to stormwater and stormwater related topics to several public groups including the Conservation Commission, Planning Board, and Zoning Board of Appeals.	Presentation will be given to private and/or public groups during the winter of Permit Year 2 and annually throughout the permit term.

1-6	Educate dog owners about picking up dog waste	Health Department / City Clerk	A pet waste fact sheet mailed to all dog owners in annual dog registration mailing.	A notice titled <i>Dog Owner/Keeper Responsibility Reminders</i> including notations to pickup waste and mention of the City pet-waste pickup ordinance (see BMP 6-17) was mailed to all licensed dog owners.	Notice sent to dog owners in Permit Year 2 and annually throughout the permit term will specifically mention potential water quality impacts from improperly deposited pet waste.
Revised		Environmental Planner / City Clerk			
1-7	Install and maintain stormwater and pet waste clean-up signs at schools and parks	Park & Forestry Department / Recreation Department	The number of signs installed, number of signs inspected.	Pet waste cleanup signs have been installed at seven City recreation field facilities.	Pet waste cleanup signs will be installed at City parks during Permit Year 2 and maintained throughout the permit term.
1-8	Staff a table with information about stormwater at Earth Day event each year	Health Department	A table staffed each year. The number of brochures handed out.	Stormwater education brochures and a portable informational display kiosk specific to the City of Attleboro and the Ten Mile River Watershed have been designed in conjunction with the Ten Mile River Watershed Stormwater Education Project funded by a \$604b grant from DEP. In addition, general stormwater outreach materials including brochures and posters have been ordered and received from EPA.	The stormwater education brochures and display posters will be printed and available at Earth Day event(s) during Permit Year 2 and annually throughout the permit term.
Revised		Health Department / Environmental Planner			
1-9	Continue to staff a table at weekly "Wednesday Night Market". Expand information dispensed to include stormwater-related topics.	Health Department	A table staffed each year. The number of brochures handed out.	Stormwater education brochures and a portable informational display kiosk specific to the City of Attleboro and the Ten Mile River Watershed have been designed in conjunction with the Ten Mile River Watershed Stormwater Education Project funded by a \$604b grant from DEP. In addition, general stormwater outreach materials including brochures and posters have been ordered and received from EPA.	The stormwater education brochures and display posters will be printed and available for "Wednesday Night Market" events during Permit Year 2 and annually throughout the permit term.
Revised		Health Department / Environmental Planner			
1-10	Annual update of the Stormwater Management Plan at a televised Municipal Council meeting.	Environmental Planner / Department of Public Works	Annual update of SWMP at a televised Municipal Council meeting.	Various City departments have worked throughout Permit Year 1 to implement the SWMP.	An update of SWMP activities including copies of this annual report will be presented during a Municipal Council meeting during Permit Year 2 and annually throughout the permit term.

1-11	Appear on local access television talk show on City issues to discuss stormwater management issues.	Planning Department / Health Department / Department of Public Works	Periodic discussion of the importance of stormwater management presented to local access television.	No progress was made on this goal during Permit Year 1 as the local cable television talk show is no longer aired.	Should a similar program begin airing during Permit Year 2, we will attempt to implement this BMP. Otherwise, we will ask to delete this BMP from our SWMP for the remaining permit term.
1-12	Post information on stormwater management issues on local access television.	Environmental Planner	Stormwater information posted and updated on local access cable television channel during periods of non-programming.	We have purchased a 12 minute video titled "Lack Isn't Enough: The Fight For Clean Water" from the University of Connecticut Cooperative Extension. This video outlines issues relating to stormwater and non point source pollution and provides information for homeowners and municipal officials to address these problems. We have contacted programming staff at the local cable company who have agreed to air the tape during periods of non-programming. The viewing schedule will also be advertised on the government access cable channel to direct viewers to the program.	Begin airing program during Permit Year 2 and regularly throughout the permit term.
1-13	Post signs and develop and distribute brochures on Wall Street Highway Yard Stormwater Improvements project	Department of Public Works / Environmental Planner	Post signs and distribute information describing the project and its water quality benefits upon completion of construction.	The Wall Street Highway Yard Stormwater Improvements Project (see BMP 6-18) is currently being implemented and includes the installation of various BMP's to manage stormwater from the City's Department of Public Works (DPW) facility and limit pollutants entering the Ten Mile River. This project is partially funded by a \$319 grant from DEP.	Construction activities will be completed and public education information will be developed in compliance with grant requirements and the SWMP during Permit Year 2.

**1a. Additions**

1-14	Distribute and display stormwater education materials within public buildings.	Environmental Planner	The number of days display is available. The number of brochures distributed.	Stormwater education brochures and a portable informational display kiosk specific to the City of Attleboro and the Ten Mile River Watershed have been designed in conjunction with the Ten Mile River Watershed Stormwater Education Project funded by a \$604b grant from DEP. In addition, general stormwater outreach materials including brochures and posters have been ordered and received from EPA. The stormwater brochures are made available to construction contractors and the public at the following City offices: Planning Department, Building Inspection Department, and DPW.	Once completed and received by the City, the watershed specific stormwater education materials including the display kiosk will be displayed regularly at City Hall, the Attleboro Public Library, and other public buildings throughout Permit Year 2 and throughout the permit term.
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## 2. Public Involvement and Participation

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 1 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 2
2-1	Comply with state public notification guidelines at MGL Ch. 39 Section 23B.	Department of Public Works / Environmental Planner / Health Dept	Public notices posted in designated locations.	Public notices are posted in compliance with MGL Ch. 39 Section 23B requirements.	Continue to post proper public notices throughout the permit term.
2-2  Revised	Stencil catch basins with "don't dump" message.	Department of Public Works / Environmental Planner	The number of catch basins stenciled.	Stencils with wording: "Dump No Waste Drains to River" and Dump No Waste Drains to Ten Mile River" have been designed. These stencils, along with an instructional brochure have been produced in conjunction with the Ten Mile River Watershed Stormwater Education Project funded by a \$604b grant from DEP. Stenciling will be conducted by private citizen or school groups with instruction and assistance from City personnel.	Stencil up to 100 catch basins during Permit Year 2 and annually throughout the permit term.

### 3. Illicit Discharge Detection and Elimination

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 1 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 2
3-1	Conduct dry weather outfall screening	Department of Public Works	The percent of outfalls screened.	The City has mapped its stormwater collection system (see also BMP 3-2 & 3-3) including all of its known outfalls. A total of 549 outfalls have been identified and mapped using a geographic information system (GIS). City staff, along with an engineering consultant, have attempted to field locate each outfall and screen each for dry weather flow. A total of 405 outfalls were located and screened in the field during Permit Year 1.	The locations (including x, y, and z coordinates) of each outfall will be inputted into the GIS (see also BMP 3-2 & 3-3) along with a photograph, and field notes relating to dry weather flow. The City will use this information to prioritize outfalls for further investigation in its search for illicit discharges (see BMP 3-4). A total of 144 mapped outfalls were not located in the field. The City will conduct additional field activities during Permit Year 2 in an effort to locate each of these outfalls and screen them for dry weather flow..
3-2	Map stormwater outfalls and receiving waters	Environmental Planner Environmental Planner / Department of Public Works	Map of all known outfalls and their receiving waters created.	The City has mapped its stormwater collection system (see also BMP 3-1 & 3-3) including all of its known outfalls and their receiving waters. A total of 549 outfalls have been identified and mapped. The stormwater collection system has been included as a separate layer in the City's GIS system (see BMP 3-3).	The locations of outfalls have been field-verified and located using either GPS technology or traditional surveying techniques. This information will be inputted into the GIS (see also BMP 3-1 & 3-3). A total of 144 mapped outfalls were not located in the field. The City will conduct additional field activities during Permit Year 2 in an effort to locate each of these outfalls and determine their status.
Revised					

3-3	Map the stormwater collection system in a GIS	Environmental Planner	Create map of stormwater system.	The City has mapped its stormwater collection system (see also BMP 3-1 & 3-2) including all of its known catch basins, pipelines, manholes, and outfalls. The stormwater collection system has been included as a separate layer in the City's GIS system.	The stormwater collection system layer of the GIS system will be revised to include field-verified locations, descriptions and screening data for each identified outfall (see BMP 3-1 & 3-2).
Revised		Environmental Planner / Department of Public Works			
3-4	Develop and implement plan to identify and remove non-stormwater discharges	Department of Public Works	Number of illicit connections found and removed.	The City has attempted to field locate each outfall and screen each for dry weather flow. A total of 405 outfalls were located and screened in the field. Conditions at each outfall were noted and a photograph was taken of each. This information will be included in the stormwater layer of the City's GIS system. Outfalls with dry weather flow and/or obvious signs of contaminants have been noted and will be priorities for further evaluation and investigation for illicit connections. A total of six (6) outfalls with suspected contaminants were identified during this field work.	Storm drain pipelines will be inspected using TV-inspection equipment to identify illicit connections. Priority for inspections will be given to those areas where dry weather flow and potential contamination were observed. A database will be developed to track inspections and observations of dry weather flows. Those outfalls with dry weather flows suspected of contamination will be investigated.
Revised		Environmental Planner / Department of Public Works			
3-5	Develop ordinance that prohibits non-stormwater connections to the municipal separate storm sewer system (MS4), gives the City authority to access buildings to search for illicit connections, and allows the City to require redirection of any illicit connections found.	City Attorney/Planning Department / Department of Public Works	A draft ordinance developed and presented to Municipal Council.	Ordinances prohibiting non-stormwater connections to the MS4 and allowing the City authority to remove existing illicit connections were reviewed. Several models from other communities and government agencies were reviewed and considered for Attleboro.	A model ordinance developed by DEP will be modified for Attleboro and presented to the Municipal Council for consideration during Permit Year 2.

3-6	Continue inspection of new construction for correct connection	Department of Public Works / Dept of Water and Wastewater	New construction inspected.	The Department of Water and Wastewater inspects every permitted connection for new construction to ensure that water and sanitary sewer lines are correctly tied to municipal service lines. The DPW inspects new stormwater management system components to ensure that they are constructed in accordance with approved plans.	This program will continue throughout the permit term.
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**4. Construction Site Stormwater Runoff Control**

<b>BMP ID #</b>	<b>BMP Description</b>	<b>Responsible Dept./Person Name</b>	<b>Measurable Goal(s)</b>	<b>Progress on Goal(s) -- Permit Year 1 (Reliance on non-municipal partners indicated, if any)</b>	<b>Planned Activities -- Permit Year 2</b>
4-1	Construction site erosion and sedimentation control ordinance for construction sites greater than 1 acre in area	City Attorney / Planning Department	A draft ordinance developed and presented to Municipal Council.	Ordinances requiring an erosion and sediment control plan and waste management plan at construction sites greater than one acre in size were reviewed. Several models from other communities and government agencies were reviewed and considered for Attleboro.	A model ordinance developed by DEP will be modified for Attleboro and presented to the Municipal Council for consideration during Permit Year 2.
Revised		City Attorney / Planning Department / Department of Public Works			
4-2	Require construction site operator to submit monthly erosion and sediment control inspection reports for sites greater than 1 acre.	Department of Public Works	Inspection reports submitted to the City.	No activities were conducted relative to this BMP during Permit Year 1.	The implementation of this BMP is contingent on the Municipal Council adopting the construction site erosion and sediment control ordinance discussed in BMP 4-1.

4-3	Review site plans for stormwater impacts	Environmental Planner / Planning Board  Environmental Planner / Planning Board / Conservation Commission / Zoning Board of Appeals	The number of site plans reviewed for erosion and sediment control.	The Planning Board, Conservation Commission, and Zoning Board of Appeals regularly review all proposed development plans for proper erosion and sediment controls during construction.	Municipal boards will continue to review proposed development plans. Additionally, developments of greater than one acre in size which may not be subject to plan review by these boards will be subject to review contingent on the Municipal Council adopting the construction site erosion and sediment control ordinance discussed in BMP 4-1.
4-4	Consider public input	Environmental Planner / Planning Board	Public review and comment periods held; signs posted at each construction site.	Those developments that are permitted by the Planning Board, Conservation Commission, and Zoning Board of Appeals are reviewed at public hearings in which public comments are accepted. No additional activities were conducted relative to this BMP during Permit Year 1.	The implementation of this BMP beyond those developments currently reviewed by the Planning Board, Conservation Commission, and Zoning Board of Appeals is contingent on the Municipal Council adopting the construction site erosion and sediment control ordinance discussed in BMP 4-1.

### 5. Post-Construction Stormwater Management in New Development and Redevelopment

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 1 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 2
5-1	Develop ordinance to apply Standards 2, 3, 4, 7, and 9 of the Massachusetts Stormwater Policy to the entire City. Present to Municipal Council.	City Attorney / Planning Department	A draft ordinance developed and presented to Municipal Council.	Ordinances requiring specific performance standards as presented in the Massachusetts Stormwater Management Policy for development sites greater than one acre in size were reviewed. Several models from other communities and government agencies were reviewed and considered for Attleboro.	A model ordinance developed by DEP will be modified for Attleboro and presented to the Municipal Council for consideration during Permit Year 2.
	Revised	City Attorney / Planning Department / Department of Public Works			
5-2	Specify a stormwater BMP manual to be used for consistent design and performance standards	Environmental Planner	BMP manual selected.	No activities were conducted relative to this BMP during Permit Year 1.	The implementation of this BMP is contingent on the Municipal Council adopting the stormwater management ordinance discussed in BMP 5-1.
5-3	Ensure long-term maintenance of structural BMPs.	City Attorney/Planning Department	A draft ordinance developed and presented to Municipal Council.	No activities were conducted relative to this BMP during Permit Year 1.	The implementation of this BMP is contingent on the Municipal Council adopting the stormwater management ordinance discussed in BMP 5-1.

**6. Pollution Prevention and Good Housekeeping in Municipal Operations**

<b>BMP ID #</b>	<b>BMP Description</b>	<b>Responsible Dept./Person Name</b>	<b>Measurable Goal(s)</b>	<b>Progress on Goal(s) -- Permit Year 1 (Reliance on non-municipal partners indicated, if any)</b>	<b>Planned Activities -- Permit Year 2</b>
6-1	Employee training program.	Department of Public Works	The number / percent of DPW employees who receive stormwater training each year.	All appropriate staff (approximately 25 individuals) from the DPW, Forestry, and Health Departments participated in a ½ day stormwater pollution prevention and good housekeeping training workshop held at the Wall Street Highway Yard on February 1, 2002. This workshop was conducted in an effort to solicit input from and improve awareness of stormwater pollution from employees working at the site as part of the highway yard stormwater improvement project (see BMP 6-18). In addition, personnel from these departments have received brochures and educational information relating to stormwater pollution during the last year and many have directly participated in the implementation of the Wall street Highway Yard Stormwater Improvement Project currently under construction (see BMP 6-18). Still others have participated in field activities associated with the mapping of storm drain outfalls and the identification of dry weather flows and illicit connections (see BMP's 3-1 & 3-2).	Appropriate staff will continue to receive training and educational information pertaining to stormwater pollution throughout the permit term. Information will be specific to activities routinely undertaken by City employees in the performance of their regular duties. Training may coincide with spill prevention and response training provided by Health Department (see BMP 6-7).
Revised		Department of Public Works / Environmental Planner			

6-2	Continue street and parking lot sweeping.	Department of Public Works	Tons of material removed from roadways and public parking lots annually.	<p>The Department of Public Works swept each public street and parking lot during the spring using both City-owned and contracted sweepers. In addition, downtown streets are swept twice weekly throughout warm weather months and others may be swept during the year on an as-needed basis. Material is properly disposed of as cover in a permitted City-owned landfill. The City removed an estimated 4,050 tons of sand and debris from City roadways during Permit Year 1.</p>	<p>The City will continue to sweep all public streets and parking lots as needed throughout the permit term.</p>
6-3	Storm drain maintenance	Department of Public Works	Percent of catch basins cleaned annually.	<p>The City maintains an estimated 3,718 stormwater catch basins. The Department of Public Works cleans catch basins regularly throughout the year using a truck mounted "clam shell" device. Residuals are properly disposed of as cover in a permitted City-owned landfill. An estimated 850 catch basins were cleaned - with an estimated 942 tons of sediment and debris removed - during Permit Year 1. DPW staff evaluate maintenance needs including equipment and record keeping in an effort to prioritize work and improve efficiency.</p>	<p>DPW staff will utilize the GIS system to better track catch basin and drainage line cleanings and prioritize work. DPW will consider the purchase of a "vactor" truck to more efficiently clean basins and drainage pipelines (see BMP 6-4).</p>
6-4	Evaluate street sweeping and catch basin cleaning equipment	Department of Public Works	Evaluation of existing equipment.	<p>The City DPW currently operates one truck mounted "clam shell" device for cleaning catch basins. In addition, the City operates one street sweeping vehicle and several smaller motorized sweepers for cleaning small parking lots and sidewalks. Each Spring, the City contracts with a private vendor for additional street sweeping services.</p>	<p>The DPW will consider various model "vactor" trucks to more efficiently clean basins and drainage pipelines (see BMP 6-3). The purchase of this type of vehicle is currently included in the City's Capital Improvements Plan.</p>

6-5	Roadway deicing	Department of Public Works	Reduction in the amount of deicers used (compared to past years with similar snowfall and demand) and environmental impacts.	<p>The DPW along with private contractors working under DPW direction implement the City's winter roadway deicing program. Roadways are treated with a mixture of sand and salt as conditions warrant. Downtown streets are treated with salt only.</p> <p>During winter 2003-2004, the City applied an estimated 3,298 tons of sand and 4,065 tons of salt to City roadways. Salt is stored at the City's Wall Street Highway Yard within an enclosed shed. The sand / salt mixture is stockpiled under cover in the same location. DPW staff evaluate the deicing program to improve efficiency and effectiveness and to limit the amount of deicing materials placed on roadways while maintaining public safety.</p>	DPW staff will continue to monitor industry standards and utilize methods of roadway deicing that are efficient and effective throughout the permit term.
6-6	Proper snow disposal	Department of Public Works	Designated snow disposal areas identified.	<p>During winter 2003-2004, DPW staff were provided with DEP snow disposal guidelines and sought to identify appropriate snow disposal locations within close proximity to downtown. Only snow removed from roadways and sidewalks within the downtown business district are transported for disposal. Several public and private parcels that meet DEP disposal guidelines were identified.</p>	DPW staff will dispose of snow removed from roadways and sidewalks in accordance with DEP disposal guidelines throughout the permit term.

6-7	Continue spill prevention and response training at DPW facility.	Department of Public Works / Health Department	The periodic training of employees	The Health Department retains the services of an outside waste management consultant to provide periodic spill prevention and response training to DPW employees working at the Wall Street Highway Yard. Participants are provided with handouts including a training manual for spill response a copy of the <i>Emergency Response Guidebook</i> . The City has also purchased two self-contained portable spill response kits, which are maintained at the Wall Street Highway Yard. Personnel are trained in the appropriate use of these materials as first responders to a spill of oil or hazardous materials. An additional training session was scheduled for March 19, 2004 but was postponed due to snow. The training session will be re-scheduled to summer 2004.	A training session will be held during Permit Year 2 and periodically thereafter throughout the permit term as needed according to employee turnover.
6-8	Develop written spill prevention and response plan for DWP facility.	Department of Public Works / Health Department	A written spill response plan developed and updated annually.	No activities were conducted relative to this BMP during Permit Year 1.	A written spill response plan will be developed for the Wall Street Highway Yard during Permit Year 2.
6-9	Continue to maintain hazardous materials inventory.	Department of Public Works / Fire Department / Health Department	Maintenance of hazardous materials inventory system.	The Health Department and Fire Department maintains an inventory of hazardous materials used by City departments as well as documentation of hazardous waste generated and disposed of by the City.	The Health Department and Fire Department will continue to document hazardous materials and waste used and generated by City departments throughout the permit term.
6-10	Minimize impacts from vehicle maintenance	Department of Public Works	The reduction in amount of hazardous materials used.	The DPW minimizes the use of hazardous materials at their Wall Street Highway Yard to the extent practicable.	The DPW will continue to explore ways to minimize the use of hazardous materials at their Wall Street Highway Yard throughout the permit term.

6-11	Minimize impacts from vehicle washing.	Department of Public Works / Police Department	Investigate current vehicle washing practices and recommend improvements. Decline in use of soap. Switch to biodegradable soap.	The Health Department has investigated vehicle-washing practices by the DPW, Fire, and Police Departments and is searching for an appropriate biodegradable, phosphorus-free detergent for these departments to use.	An appropriate biodegradable, phosphorus-free detergent will be identified and purchased for the DPW, Fire Department, and Police Department to use when washing vehicles.
Revised		Health Department / Department of Public Works / Fire Department / Police Department			
6-12	Park and landscape maintenance.	Park & Forestry Department / Recreation Department	The amount of herbicides & fertilizers used.	Park & Forestry Department field personnel are trained in the proper application of fertilizers, herbicides, and pesticides at all City parks. In addition, the Recreation Department is staffed by one licensed pesticide applicator who is responsible for the application of all fertilizers, herbicides, and pesticides at City recreation facilities. These departments have begun keeping records of the amounts of these materials used throughout the year.	The Park & Forestry Department will continue to staff trained personnel. These departments will also maintain records of fertilizers, herbicides, and pesticides used throughout the permit term.
6-13	Continue tree planting and maintenance program.	Park & Forestry Department / Recreation Department	The number of trees planted.	The Park & Forestry Department planted approximately 75 trees on public roadways and properties during Permit Year 1.	The tree-planting program will continue throughout the permit term.

6-14	Illegal dumping control.	Department of Public Works / Health Department	The number of signs posted. The number of sites cleaned up	The Health Department routinely investigates reports of illegal dumping of waste throughout the city. The Health Department attempts to identify the responsible party and order cleanup. When necessary, the DPW will remove waste material for proper disposal. Signs are posted warning of violations for illegal dumping. The Health Department and/or DPW posted approximately 20 signs and removed waste from approximately 12 dumping areas.			Household hazardous waste collection day held annually.	The Health Department conducted a collection for household hazardous waste for city residents on June 14, 2003. This program was used by approximately 150 residents and collected 500 pounds of miscellaneous flammable aerosols, 3 pounds of mercury, 220 pounds of mercury containing material (thermometers, thermostats, etc.), 130 pounds of waste flammable liquids, 7 pounds of waste pesticides, 7 pounds of flammable solids, 3 pounds of oxidizing solids, 10 pounds of toxic solids, 13 pounds of basic corrosive liquids, 4 pounds of caustic alkali liquids, 12 pounds of acidic corrosive liquids, 3 kilograms of polychlorinated biphenyls (PCB), and 27 pounds of asbestos. All waste material collected was received by a licensed waste disposal contractor and removed for proper disposal.	The Health Department will maintain records of all identified illegal dumping areas and cleanup/enforcement actions taken beginning in Permit Year 2 and through the remainder of the permit term.
6-15	Continue to hold Annual Household Hazardous Waste Collection Day.	Health Department							The Health Department has scheduled a household hazardous waste collection day for June 12, 2004. This event will be held annually throughout the permit term.

6-16	Continue to provide monthly waste drop off days.	Health Department	Paint products and automotive wastes collected from residents monthly during non-winter months. Bulk items collected by appointment throughout the year.	The Health Department conducted collections for paint products, automotive wastes, batteries, and fluorescents for city residents on the first Saturday of the month from April through November 2003. This program was used by an average of more than 200 residents per event and collected 2,982 tires, 3,750 gallons of used motor oil, 2,035 gallons of latex paint, 1,925 gallons of oil based paint, 360 gallons of antifreeze, 1,005 propane tanks, 3 pounds of lithium batteries, 40 pounds of nickel/cadmium batteries, 400 pounds of lead acid batteries, four 55-gallon drums of used oil filters, and 3,166 linear feet of fluorescent lamps. All waste material collected was received by a licensed waste disposal contractor and removed for proper disposal.	The Health Department has scheduled paint product and automotive waste collection days for the first Saturday of the month from April through November 2004. These events will be held annually throughout the permit term.
6-17	Continue enforcement of pet waste pick-up ordinance. Continue frequent trash barrel emptying to encourage proper disposal.	Health Department / Animal Control Officer / Department of Public Works / Parks & Forestry Department / Recreation Department.	Reduction of complaints if any in public areas; frequency of trash barrel emptying.	The City's Animal Control Officer enforces the pet waste pick-up ordinance throughout the city. In addition, the Park & Forestry Department and Recreation Department enforce the ordinance within City parks and recreation facility properties.	City staff will continue to enforce the pet waste pick-up ordinance throughout the permit term.

6-18	Implement stormwater improvements at Wall Street Highway Yard	Department of Public Works / Environmental Planner	Construction of stormwater improvements project.	<p>This project entails the implementation of a comprehensive stormwater management plan for the City's DPW Wall Street Highway Yard. The project includes the installation of new drainage inlets, pipelines, and treatment systems to treat stormwater from the site prior to discharge to the Ten Mile River. In addition the project includes the re-grading and paving of large portions of the site, the removal of material and debris from proximity to the river and the establishment of a vegetated riparian buffer strip. Finally, the project includes an operation and maintenance plan and pollution prevention measures for municipal employees working at the site (see BMP 6-1), and public education and outreach components (see BMP 1-13). The project is being funded in part by a grant from DEP's Section 319 Nonpoint Source Pollution Competitive Grant Program. All permitting and final design plans were completed and two stormwater treatment units along with associated pipelines and inlets were installed during Permit Year 1.</p>	<p>All remaining construction and reporting activities related to this project will be completed during Permit Year 2. Maintenance of stormwater management system components, public education materials, and the pollution prevention plan will continue throughout the permit term.</p>
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## Education, Involvement, and Training

Estimated number of residents reached by education program(s)	(# or %)	Not Determined
Stormwater management committee established	(y/n)	No
Stream teams established or supported	(# or y/n)	No
Shoreline clean-up participation or quantity of shoreline miles cleaned	(y/n or mi.)	No
Household Hazardous Waste Collection Days		
<ul style="list-style-type: none"> <li>▪ days sponsored</li> </ul>	(#)	9 Days
<ul style="list-style-type: none"> <li>▪ community participation</li> </ul>	(# of residents)	1,800 +/-
<ul style="list-style-type: none"> <li>▪ material collected</li> </ul>	(#, pounds, tons or gallons)	2,982 tires 3,750 gallons of oil 2,035 gallons of latex paint 1,925 gallons of oil paint 360 gallons of antifreeze: 1,005 propane tanks 3,166 linear feet of fluorescent lamps 3 pounds of lithium batteries 40 pounds of nickel/cadmium batteries 400 pounds of lead acid batteries 4 55-gallon drums of used oil filters 500 pounds of flammable aerosols 3 pounds of mercury 220 pounds of mercury containing material (thermometers, thermostats, etc.) 130 pounds of waste flammable liquids 7 pounds of waste pesticides 7 pounds of flammable solids 3 pounds of oxidizing solids 10 pounds of toxic solids 13 pounds of basic corrosive liquids 4 pounds of caustic alkali liquids 12 pounds of acidic corrosive liquids 3 kilograms of PCBs 27 pounds of asbestos.
School curricula implemented	(y/n)	No

**Legal/Regulatory**

	In Place Prior to Phase II	Under Review	Drafted	Adopted
<b>Regulatory Mechanism Status (indicate with "X")</b>				
▪ Illicit Discharge Detection & Elimination		X		
▪ Erosion & Sediment Control		X		
▪ Post-Development Stormwater Management		X		
<b>Accompanying Regulation Status (indicate with "X")</b>				
▪ Illicit Discharge Detection & Elimination		X		
▪ Erosion & Sediment Control		X		
▪ Post-Development Stormwater Management		X		

**Mapping and Illicit Discharges**

Outfall mapping complete	(%)	<b>100%</b>
Estimated or actual number of outfalls	(#)	<b>549</b>
System-Wide mapping complete	(%)	<b>100%</b>
<b>Mapping method(s)</b>		
▪ Paper/Mylar	(%)	<b>100%</b>
▪ CADD	(%)	<b>0%</b>
▪ GIS	(%)	<b>100%</b>
Outfalls inspected/screened	(# or %)	<b>405 or 74%</b>
Illicit discharges identified	(#)	<b>6 (potential)</b>
Illicit connections removed	(#) (est. gpd)	<b>None</b>
% of population on sewer	(%)	<b>65% +/-</b>
% of population on septic systems	(%)	<b>35% +/-</b>

### Construction

Number of construction starts (>1-acre)	(#)	15 +/-
Estimated percentage of construction starts adequately regulated for erosion and sediment control	(%)	100%
Site inspections completed	(# or %)	90%
Tickets/Stop work orders issued	(# or %)	5
Fines collected	(# and \$)	5 and \$1,500
Complaints/concerns received from public	(#)	Not Determined

### Post-Development Stormwater Management

Estimated percentage of development/redevelopment projects adequately regulated for post-construction stormwater control	(%)	80%
Site inspections completed	(# or %)	Not Determined
Estimated volume of stormwater recharged	(gpy)	Not Determined

### Operations and Maintenance

Average frequency of catch basin cleaning (non-commercial/non-arterial streets)	(times/yr)	0.23
Average frequency of catch basin cleaning (commercial/arterial or other critical streets)	(times/yr)	1
Total number of structures cleaned	(#)	850
Storm drain cleaned	(LF or mi.)	Not Determined
Qty. of screenings/debris removed from storm sewer infrastructure	(lbs. or tons)	942 Tons
Disposal or use of sweepings (landfill, POTW, compost, recycle for sand, beneficial use, etc.)		Landfill
Cost of screenings disposal	(\$)	None
Average frequency of street sweeping (non-commercial/non-arterial streets)	(times/yr)	1
Average frequency of street sweeping (commercial/arterial or other critical streets)	(times/yr)	50 +/- (Downtown)

Qty. of sand/debris collected by sweeping	(lbs. or tons)	4,050 tons
Disposal of sweepings (landfill, POTW, compost, beneficial use, etc.)	(location)	Landfill
Cost of sweepings disposal	(\$)	None
Vacuum street sweepers purchased/leased	(#)	None
Vacuum street sweepers specified in contracts	(y/n)	No

Reduction in application on public land of: ("N/A" = never used; "100%" = elimination)		
<ul style="list-style-type: none"> <li>▪ Fertilizers</li> </ul>	(lbs. or %)	Not Determined
<ul style="list-style-type: none"> <li>▪ Herbicides</li> </ul>	(lbs. or %)	Not Determined
<ul style="list-style-type: none"> <li>▪ Pesticides</li> </ul>	(lbs. or %)	Not Determined

Anti-/De-Icing products and ratios	% NaCl % CaCl <sub>2</sub> % MgCl <sub>2</sub> % CMA % Kac % KCl % Sand	25%
Pre-wetting techniques utilized	(y/n)	No
Manual control spreaders used	(y/n)	Yes
Automatic or Zero-velocity spreaders used	(y/n)	No
Estimated net reduction in typical year salt application	(lbs. or %)	Not Determined
Salt pile(s) covered in storage shed(s)	(y/n)	Yes
Storage shed(s) in design or under construction	(y/n)	No