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Town of Shirley

DEPARTMENT OF PUBLIC WORKS



158 GREAT ROAD - SHIRLEY, MASSACHUSETTS - 01464-2812
Joseph W. Lynch - Director

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April 29, 2005

*Received
CIP -
5/9/05*

United States Environmental Protection Agency - Region 1
One Congress Street
Suite 1100 (CIP)
Boston, MA 02114-2023

Attn: Thelma Murphy

RE: NPDES-II
Permit #MA041221
Annual Report – March 04 – March 05

Dear Ms. Murphy,

Pursuant to the terms of our permit requirements enclosed please find the Annual Report for the Town of Shirley, Massachusetts - NPDES-II Small MS4 permit.

I am aware that the report is due on May 1st of each year. It was our full and faithful intent to have mailed this report on April 29, 2005 in support of this deadline. However, on April 27th I received some very sudden and horrible news that resulted in the delay (by a few days) of submitting this report. On the afternoon of April 27th I called Ms. Ann Herrick at EPA (as directed in a recent EPA postcard) and informed her that my mother was gravely ill and that I needed to leave immediately to be with her and my family at her bedside in Florida. Ms. Herrick assured me that under the circumstances a small delay would not be a problem. She noted our telephone conversation in her log. My mother in fact passed away on Friday morning April 29th.

I have returned to work today and have completed our report. I am sorry for the inconvenience of the delay in the Town's submission of the 04-05 Annual Report. You can rest assured that the Town is committed to the NPDES program and that we are making full faith effort in achieving success by it. Thank you for your consideration in this matter.

Respectfully submitted,

Joseph W. Lynch
Director – Department of Public Works

CC: Linda Domizio - MA-DEP
DEP – Headquarters - Boston

Municipality/Organization: Town of Shirley, Massachusetts

EPA NPDES Permit Number: MA041221

MaDEP Transmittal Number: W-041141

**Annual Report Number
& Reporting Period:** No. 2: March 04-March 05

NPDES PII Small MS4 General Permit Annual Report

Part I. General Information

Contact Person: Joseph W. Lynch

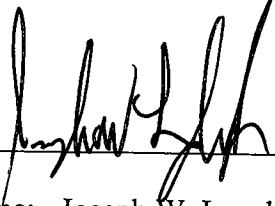
Title: Director of Public Works

Telephone #: 978-425-2628

Email: jlynch@shirley-ma.gov

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: Joseph W. Lynch

Title: Director of Public Works

Date: April 29, 2005

Part II. Self-Assessment

The Town continues to make progress in implementing the BMP's set forth in our NPDES-II Permit.

From a stormwater perspective the Town of Shirley is fortunate to be a very small, rural community with little commercial or industrial property, few formal stormwater management systems, and very few pollution problems. However, as a small rural community with a very small portion of commercial or industrial tax base we, like many of our contemporary communities, find it extremely difficult to maintain existing levels of service, let alone undertake a great effort in fostering new programs like NPDES-II. Nevertheless, the Town is committed to, and has in years-one and two carried out, the vast majority of the BMP's described in our General Permit. We are equally lucky to have a conscientious population that is dedicated to preserving our environment, minimizing pollution discharges, participate in recycling, adoption of reasonable and fair bylaws for land use planning, and preservation of open space.

Overall, I believe the town has made a more than fair effort in achieving the BMP's targeted for the first two years and set forth in our General Permit. We do find it very constraining to have met these permit obligations during the difficult financial times that we have faced over recent years. The town will continue to do its best to carry out all of the low cost or volunteer BMP's, make use of even better good housekeeping practices within our municipal departments, and continue to spread the word to the community at large of the importance of NPDES-II on their community.

The town has historically been receptive to reasonable and fair land planning bylaws. In fact the town has in place a controlled growth bylaw that limits new housing starts per year, which thus minimizes exposure to construction runoff discharges. This year the Conservation Commission was successful in passage of a controversial and sweeping and strict re-write of its local Conservation Bylaw. Passage was possible only through the diligent work in fostering credibility of the NPDES-II provisions and separating them from the other more controversial provisions of the Conservation Bylaw. It was the difference between failure last year and passage this year.

The town has also found it financially difficult to set in place some of the basic logistical platforms on which to base its Public Education and Public Participation BMP's. Significant cuts in the School Department budget have resulted in elimination of teaching and staff positions and essentially has resulted in the delay in expanding stormwater education into the school system. However, the town has continued to spread the word to the community at large of the importance of NPDES-II on their community through the public hearing process, and implementation of strict site plan review process. Also, the Town's DPW has always been a very instrumental participant in various good housekeeping practices. They employ multiple-time-per-year street sweepings, catch basin cleaning, contained equipment washing, and contained storage of new and waste petroleum products. Most recently they have employed more responsible irrigation, fertilization, and pest management practices. They have also reduced their application of road salt in winter months. Lastly, the DPW is actively training with their colleagues in abutting communities regarding better good housekeeping practices.

We will continue to strive toward achieving success in all of our BMP's. We will at least make every effort towards maintenance of our clean local and regional environs.

Part III. Summary of Minimum Control Measures

1. Public Education and Outreach

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 2 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 3
PE-1	Distribute SW Brochure	DPW/Joseph Lynch	Y1-Y5: Distribute one flyer in local newspaper	Targeted for any year during years 1 to 5. Have continued gathering and compiling information suitable for inclusion in flyer, development of info outline, reviewed samples from other communities and periodical references. As in Y1, sought out but was unable to secure funding.	Finalize info gathering and complete outline. Seek funding partner, publish, and distribute brochure when funding is secured.
PE-2	Feature SW info an annual town events.	Conservation Commission/ Anne Gagnon	Y1: Create or obtain SW brochures or info, solicit sponsors. Y2: Feature SW info at Cons-Comm. booth at annual hoedown. Y3-Y5: Continue providing SW info.	Have continued compiling information suitable for inclusion in our own stormwater brochure; developed an informational outline. Sought out but have been unable to secure funding or sponsorships. Have made available generalized SW information pamphlets obtained at MACC conference. Displayed SW NPDES posters in all permit offices.	Hoedown has been canceled indefinitely due to lack of community interest. The Town will seek to identify any other public display opportunities and will continue development of our own information brochure.
PE-3	Provide SW information at Town buildings.	Selectman's Office / Kyle Keady	Y1: Obtain materials Y2: Provide info Y3-Y5: Maintain and update info.	We continue to research and identify what SW info is available and make it available in the Cons Comm., Planning Board, and Building Inspector's offices. We continue to make referrals of inquiries to these other municipal offices (located adjacent to Selectman's office)	We will continue with the same practices as years 1 and 2. Will continue to seek out and secure funding to publish hand-out the town's own information brochure.

PE-4	Stormwater Webpage	Technology Committee / Kyle Keady	Y1: Develop webpage content. Research logistics. Y3: Have webpage up and running. Y4: Add "feedback" component. Y5: Update webpage.	Maintained partnering relationship with Cons Comm., Planning Board offices and the DPW to identify info to include in our future webpage. Developed DPW remote network link to Shirley main-site. Established hardware needs, and developed purchase schedule for necessary equipment. Purchased hardware necessary to make network link from DPW to Town Hall main network.	Continue with completing logistical needs. Finalize web page content by working with Cons Comm., Planning Board, and DPW. Have web page up and running by year's end.
PE-5	Stormwater Hotline	DPW/Joseph Lynch	Y1: Install hotline, mention in flyer. Y2-Y5: Maintain Hotline.	A dedicated telephone line for Stormwater Hotline has not yet been secured. Have continued in our attempts to seek out and secure funding to establish hotline and to publish and distribute flyer. However, continued to not attain success in this goal. Have continued to accept reports and answer questions via departmental lines. This stop-gap measure has proven to be functional and will continue until permanent hotline is established.	Will continue to seek out funding to publish and distribute flyer so that mention of Hotline can be made available. Will continue our effort to establish a dedicated hotline, and will continue to accept "hotline" reports at Planning, Cons Comm., and DPW offices.

2. Public Involvement and Participation

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 2 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 3
PP-1	Partner/Support Local Watershed Group	Conservation Commission / Anne Gagnon	Y1: Support Nashua River Watershed Association Y2:-Y5: Maintain Support	Various Commission members continue to maintain active participation in NRWA meetings. Commission member(s) and other town's staff remain actively involved with MACC, and Mass Audubon.	Maintain continued participation with NRWA.

PP-2	Poster Contest	School Department / Patricia Stearn	Y2: Develop concept, approach, educators and potential sponsors. Y3: Pilot poster contest in one grade. Y4&Y5: Modify and continue contest.	Discussed development concept and approach with Middle School Art Department and Science Department. Agreed to target Pilot Poster Contest during 2005-2006 school-year at the middle school age level. Have not yet identified who might participate as potential contest sponsors.	Will identify potential sponsors and attempt securing funding. Will undertake pilot poster contest within the educational constraints of the Middle School curriculum.
PP-3	Storm Drain Stenciling Program	DPW / Joseph Lynch	Y1: Outline Program; identify labor pool (scouts, inmates). Y2: Obtain stencils, develop plan and approach. Y3: Stencil 25% of catch basins. Y4: Stencil additional 40% of catch basins. Y5: Stencil remaining 35% of catch basins	A second Eagle Scout candidate continued upon the catch basin program undertaken by a previous boy scout during Y1. These programs inventoried all basins in the "area north of Hazen Road and south of Great Road", designed stencil, and painted basins along with their volunteer teams. The effort of these two scouts has resulted in approximately 80% of the town's basins being stenciled, which puts the town far ahead of its third year goal.	Identify what other volunteers and groups can pick up on this program so that it remains effective over next and future years.
PP-4	Incorporate SW message into public meetings	Exec Secretary / Kyle Keady	Y1: Identify / target meetings and develop message content, discuss SW at one public meeting. Y2-Y5: Discuss SW at 2 public meetings	Stormwater management was again discussed part and parcel with the Local Wetlands Bylaw Warrant Article and the Special Town Meeting. There was considerable debate, and an overall appreciation and support for the concept of SW management and resource protection. Unlike last year, when the Bylaw revisions failed at Town Meeting, this year there was much broader support for the bylaw article, which passed (though its overall scope was greatly diminished from that proposed last year) at . Many Planning Board, Bylaw Review Committee, and Conservation Commission meetings included discussions on Stormwater Management as it pertains to those particular Bylaws. These discussions were productive and informative.	Continue to press the message on the importance of effective Stormwater Management through Bylaw development and continue to develop forums where this message can be heard by the public.

PP-5	Pet waste Control	DPW / Joseph Lynch	<p>Y1: Develop approach and discuss with staff (exclude farm land due to BOH manure management plan in place)</p> <p>Y2: Begin visual inspections of open areas, keep record of findings.</p> <p>Y3: Evaluate contamination threat based upon inspection results and drainage system layout.</p> <p>Y4: Evaluate need for "Pooper Scooper Bylaw".</p> <p>Y5: If needed, post and enforce Bylaw, reduce amount of waste to maximum amount practicable.</p>	<p>Continued in formulation of control approach via discussions with BOH members, pet owners (found walking their dogs on public property), and municipal lawn mowing staff (whom see the waste remnants firsthand), Recreation Commission, and Fields Committee.</p> <p>Continued field visual inspections with consideration of threat by drainage proximity. This effort has determined that there is little to no problem with disposal of pet wastes in areas of stormwater collection and/or runoff.</p> <p>Implemented a formal policy through the Town's Recreation Fields Committee (short of Bylaw) whereby pet waste must be picked up from public property and disposed of at the owners home sanitary facility, and pets must be secured on a lease on public property.</p> <p>These measures put us far ahead of schedule in this BMP.</p>	<p>Continue with success of work thus far achieved. Consider adding formal "Pooper Scooper" provisions to the Town's existing Lease Bylaw.</p>
PP-6	Storm Water Committee	Exec. Secretary / Kyle Keady	<p>Y1: Define mission statement, identify members.</p> <p>Y2-Y5 Meet regularly</p>	<p>Listed target membership and ex-officio staff members. Citizen appointments to the Committee not made, Committee not yet formally adopted by local authority. Continued to meet regularly at the staff level to assure that progress is attained and maintained.</p>	<p>Formalize committee's local authority. Make formal committee appointments. Organize steering committee sessions to develop and define formal mission.</p>

PP-7	Implement Stormwater Clean-up Day	Exec. Secretary / Kyle Keady	Y1: Review Clean-up Day practices Y2: Identify compatible stormwater goals Y3-Y5: Have one stormwater clean-up day.	Discussed "Clean-up Day" concept with staff. Determined that to be successful it is best organized and implemented by Stormwater Committee and carried out by large user groups such as Little League, Soccer Association, Boy and Girl Scouts, and school groups like the PTO or class groups.	Will add this goal and concept to the Stormwater Committee's mission frameworks.
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3. Illicit Discharge Detection and Elimination

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 2 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 3
ID-1	Drainage Mapping	DPW/Joseph Lynch	Y1: Develop mapping strategy, and inventory existing plans, determine town wide GIS support, begin outfall locating in critical areas (historic properties and critical habitats) Y2: Locate 30% of outfalls, select mapping format. Y3: Locate additional 35 % of outfalls. Y4: Continue mapping, locate remaining 35% of outfalls. Y5: Complete drainage map.	Mapping strategy developed. Inventory of existing documents (plans and maps) made. Determined that there is little to no existing GIS support, data, or expertise, on a town wide basis. However, we have determined that GPS (not a full-blown GIS) mapping capabilities linked to an active database presents itself as an effective mapping tool. Have begun identifying large outfalls in critical areas. Selected a mapping format and refine mapping strategy and protocol. Expand mapping of outfalls to complete all critical areas and complete mapping for approximately 30% of the total outfalls.	Will expand mapping of outfalls to complete all critical areas and complete mapping for approximately 65% of the total outfalls.

ID-2	Implement Illicit Discharge Bylaw	Bylaw Committee / Joseph Lynch	<p>Y1: Form Committee, research Phase II requirements and compare to existing Town regulations.</p> <p>Y2: Develop Bylaw or modify existing one.</p> <p>Y3: Present Bylaw at Town Meeting</p> <p>Y4: Implement and enforce bylaw.</p> <p>Y5: Review effectiveness of bylaw.</p>	<p>Bylaw review committee established. NPDES-II requirements have been reviewed. Town moves forward to making changes to its various land planning / land use bylaws in preparation to tackle mission goals of NPDES-II. Completed research on NPDES-II requirements versus the town's existing bylaws. The town has prepared amendment to the Planning Board Site Plan Approval Bylaw to include provisions consistent with NPDES-II. The amended bylaw was passed at Special Town Meeting.</p>	<p>Will continue with research on NPDES-II requirements versus existing bylaws. Will prepare a separate and distinct Stormwater Bylaw document and attempt passage at an upcoming Town Meeting.</p>
ID-3	Eliminate Illicit Discharges	DPW	<p>Y1: Develop Illicit Discharge Detection and Elimination plan</p> <p>Y2: Investigate potential problem areas</p> <p>Y3: Identify sources of illicit discharges; notify owners of their legal requirement to eliminate.</p> <p>Y4: Conduct follow-up inspections, take legal action if necessary.</p> <p>Y5: Continue to identify and eliminate illicit discharges.</p>	<p>Have made marginal progress on this BMP. However, have made an overall determination that little problem exists with regard to illicit discharges in town.</p> <p>Have implemented a stringent inspection protocol for new subdivision, and commercial/industrial construction projects.</p> <p>The town has only recently seen its first municipal sewer system come on line. In this regard, the Sewer Commission has developed a comprehensive strategy for identifying plumbing, and septic outfalls and connection (and separation) of those to the new sanitary sewer system. The commission is also actively developing and implementing an Industrial Pretreatment Program (IPP).</p>	<p>Will complete development of Illicit Discharge Detection and Elimination plan. And will expand evaluation and investigation of potential problem areas through cooperative efforts with the Sewer Commission..</p>

ID-4	Educate public regarding illicit discharges.	Kyle Keady / own Administrator	Y2: Incorporate illicit discharge information into PE BMP's Y3: Notify public of upcoming Bylaw vote. Y4: Notify public of upcoming Bylaw enactment.	Debated validity and importance of Stormwater impacts caused by illicit discharges at numerous hearings.	Will continue to keep public apprised of bylaw development activities.
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4. Construction Site Stormwater Runoff Control

BMPI D #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 2 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 3
CS-1	Implement Erosion and Sedimentation Control Bylaw.	Bylaw Committee / Joseph Lynch	Y3: Assess current erosion and sediment control measure regulations with respect to NPDES-II Y4: Modify existing subdivision regulations and/or develop and add Erosion and Sediment Control Bylaw. Create sanctions for non-compliance with Erosion and Sediment Control Bylaw and site requirements. Y5: Enforce Bylaw.	Little definitive progress made since the BMP is a Y3 BMP. However, have implemented a broad-based inspection protocol for new subdivision, and commercial/industrial construction projects. Though not scheduled until Y3 BMP (CS-3), embarked upon an aggressive inspection protocol (informal) for a couple of the more vulnerable construction sites that posed an erosion risk potential	Will prepare to make assessment per Y3 goal.

CS-2	Site Plan Review	Planning Board	<p>Y1: Review existing site plan review procedures against NPDES-II requirements.</p> <p>Y3: Enhance or expand site plan review procedures to require waste control and to include construction site operators to implement and erosion and sedimentation control program, which includes appropriate BMP's</p> <p>Y4: Implement enhanced site plan review.</p> <p>Y5: Continue site plan reviews according to the new Erosion and Sedimentation Control Bylaw.</p>	<p>Existing site plan review regulations and procedures were reviewed. In fact, site plan review regulations in town were non-existent.</p> <p>The town immediately adopted a policy whereby site plans are reviewed for applicability under NPDES-II by a combination of the DPW Director and/or the town's third-party review consultant.</p> <p>Expanded upon the policy implemented under Y1. The town's Bylaw Review Committee drafted a bylaw amendment to require site plan review for certain threshold projects. The amendment was debated at public hearing and will be presented for passage as a warrant article at a future town meeting.</p>	<p>Expand upon the policy implemented under Y1 and Y2 and will promote passage of bylaw to require site plan review for certain threshold projects.</p> <p>Offer warrant article at a future town meeting requesting passage of an amendment to the Planning Board Bylaw such that site plan review is required as a matter of law, rather than a matter of policy.</p>
CS-3	Site Inspection and Enforcement	Planning Board / Joseph Lynch	<p>Y3: Add construction site runoff control measures to building inspector protocol</p> <p>Y4: Implement inspection for runoff control measures and site waste control.</p> <p>Y5: Review inspection guidelines and enhance if necessary.</p>	<p>Though not scheduled until Y3 BMP, embarked upon an aggressive inspection protocol (informal) for a couple of the more vulnerable construction sites that posed an erosion risk potential</p>	<p>Establish a more formal site inspection protocol based upon findings learned during the Y2 pilot inspection program.</p>

CS-4	Solicit and record public comments regarding stormwater	Stormwater Committee / Joseph Lynch	Y1-Y2: Continue existing public hearing process to allow for public comments. Incorporate construction site concerns into PE-BMP. Y3-Y5: Use hotline established in PE-5 to receive and record public comments.	Public hearing processes during Y1 & Y2 focused exclusively on zoning and land use bylaw changes. However, the feedback obtained during these processes indicates that flooding, and water quality were important issues to the townspeople. Therefore, many of the proposed bylaw changes included provisions that ultimately serve and benefit the town's NPDES-II initiatives.	Will continue to evaluate bylaw changes and conduct public hearings and meetings accordingly.
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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 2 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 3
PC-1	Evaluate, enhance, and implement zoning requirements.	Zoning Board	Y2: Evaluate current zoning bylaws to determine sufficiency relative to surface water preservation. Y4: Enhance existing (or develop new) zoning bylaws focused on surface water preservation.	Continued evaluation of current zoning and land use bylaws and determined that they were relatively sufficient pertaining to surface water preservation. However, there seems to be a need to more clearly define what direct regulations can be put in place to preserve water quality with direct respect to NPDES-II.	Will continue to evaluate current zoning bylaws to determine sufficiency more directly and relative to surface water preservation. Will expand mission to include items learned through CS-4 BMP, above.

PC-2	Implement Stormwater Regulations.	Stormwater Committee	Y1: Review current subdivision regulations relative to NPDES-II requirements Y3: Evaluate adopting MA DEP Stormwater Management Standards 2, 3, 4, and 7 into local subdivision regulations.	Reviewed current subdivision regulations relative to NPDES-II requirements and MA DEP Standards. A public hearing process was undertaken during Y1 and continued through Y2. These hearings focused nearly exclusively on zoning and land use bylaw changes. However, many of the proposed bylaw changes will ultimately serve and benefit the town's NPDES-II initiatives.	Will continue (and hopefully conclude) that new and/or expanded land use and zoning bylaws are sufficient to adequately address the town's interest under NPDES-II. The town will move towards adoption of MA DEP Stormwater Management Standards 2, 3, 4, and 7 into local subdivision regulations.
PC-3	Develop and review inspection procedures for commercial and residential drainage systems / structural BMP's	DPW / Joseph Lynch	Y3: Inventory and review current maintenance procedures for private systems. Y4: Develop plan, procedure, and authority for inspections. Determine O&M requirements for structural BMP's. Y5: Implement inspection plan.	Y3 BMP, but have moved towards implementation by continuation of the early phase efforts undertaken in Y1 by mapping out potential policy matters regarding the increased frequency of municipal maintenance burden brought on by new private systems coming on line. Have begun to identify which private facilities in town might have private stormwater systems.	Will continue to develop and draft official policies regarding the new private systems that come on line. Will continue to identify, and verify which private facilities in town might have private stormwater systems and begin to ascertain what O&M procedures are used at those facilities. Consider development of a annual reporting mechanism that gathers data and compliance tracking from the private system operators to the town. No substantial progress expected until Y3 (Y3 BMP)

6. Pollution Prevention and Good Housekeeping in Municipal Operations

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 2 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 3
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GH-1	Operation and Maintenance Program.	DPW / Joseph Lynch	<p>Y1-Y2: Inventory maintenance activities, identify potential pollutant runoff, and continue current drain system and street maintenance.</p> <p>Y3: Identify means of reducing potential pollutant runoff, implement reductions.</p> <p>Y4: Evaluate current drain system maintenance routine, develop schedule, identify improvements or refinements</p> <p>Y5: Reduce pollutant runoff potential.</p>	<p>Have inventoried the town's O&M activities which include, CB and detention pond cleaning, grate cleaning, headwall maintenance, street sweeping, winter sand and salt storage, vehicle washing, fleet maintenance, turf management, and floor drain liquid collection.</p>	<p>In Y3 the town will use the complete inventory of the town's O&M activities and will evaluate each activity for potential for pollutant runoff. We will begin to develop a draft of probability and means for reducing runoff and pollution potential. Will identify means of reducing potential pollutant runoff, implement reductions. This will likely include consideration for roadway shoulder cleaning and litter picking. Additionally, the town will seek to identify an effective means of controlling damage and pollution caused by beaver activities.</p>
GH-2	Employee Training Program.	DPW	<p>Y2: Develop training program.</p> <p>Y3-Y5: Hold one Good Housekeeping Workshop per year at the DPW facility.</p>	<p>The town has developed a training regime that includes partnered inter-municipal training with our neighboring towns. Training includes basin cleaning, detention pond maintenance, equipment wash down, beaver control, and siltation control during dewatering. We have developed an inter-municipal joint training consortium between our neighboring DPW's in Devens, Ayer, Lancaster, Groton, and Harvard.</p>	<p>Will continue to work within the partnered inter-municipal joint training consortium between our neighboring DPW's in Devens, Ayer, Lancaster, Groton, and Harvard. Will continue to develop new and more formalized training protocol that focuses upon good (and safe) use of BMPs and their effect on minimizing the potential for release of polluted runoff. Will work towards formalization of a policy for an annual good housekeeping workshop.</p>

GH-3	Implement Household Hazardous Waste / Appliance Recycling Program	Board of Health	<p>Y1: Assess town's current recycling program and identify all illegal dumping problem areas.</p> <p>Y2: Incorporate illegal dumping area clean-up effort as part of existing current annual clean-up.</p> <p>Y3: Implement / enhance town's recycling program.</p> <p>Y4: Implement neighborhood watch program in areas of illegal dumping.</p>	As in Y1, the town has continued to assess the town's existing recycling, and hazardous waste collection programs. Have assessed and catalogue assessed areas of town where covert illicit dumping has been an occasional and/or recurring problem. We remain happy to report that there continues to be little problem in town regarding illegal dumping. Roadside and public areas where dumping is found is picked-up by DPW forces.	Will continue to track covert and illicit waste dumping areas. Will organize a volunteer effort to establish a clean-up day to begin to address these areas.
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7. BMPs for Meeting Total Maximum Daily Load (TMDL) Waste Load Allocations (WLA) <<if applicable>>

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 2 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 3
TMDL-1	Check current impairment lists	Stormwater Committee	Y1-Y5: Reference current 303(d) water impairment lists for new TMDL's for water bodies into which Shirley stormwater outfalls directly or indirectly.	As in Y1, the town has again referred to the applicable 303(d) impairment listing (@oaspub.epa.gov/pls/tmdl/huc_rept.control=NASHUA#IMP) relative to the Nashua River, Squannacook River, and Catacunemaug Brook. Have noted the changes in TMDL for the water bodies. No changes have been reported over the same period of last year. Have sought out assistance in reading, and understanding the information contained in the impairment listing.	Will continue to reference the applicable 303(d) impairment listing relative to the Nashua River, Squannacook River, and Catacunemaug Brook. Will continue to note any changes in TMDL for these water bodies and adjust the employment of these BMP's accordingly.

ATTACHMENT

Shirley

1291

Instructions: Complete and Include With Your Response

DECLARATION

I declare under penalty of perjury that I am JOSEPH LYNCH
[Name]

the Director of Public Works of the City/Town of Shirley, Massachusetts,
[Title]

that I am authorized to respond on behalf of the City/Town and that the foregoing is a complete,
true, and correct response.

Executed on April 8, 2005
[Date]

Joseph W. Lynch
[Signature]
Joseph W. Lynch
Director of Public Works
[Type Name and Title]