### Part III. Summary of Minimum Control Measures

#### 1. Public Education and Outreach

<table>
<thead>
<tr>
<th>BMP ID #</th>
<th>BMP Description</th>
<th>Responsible Dept./Person Name</th>
<th>Measurable Goal(s)</th>
</tr>
</thead>
</table>
| 1-1      | Co-sponsor Biennial Household Hazardous Waste Collection Events                   | Sterling Department of Public Works           | Spring/Fall '03 - Spring/Fall '04 - Spring/Fall '05 - Spring/Fall '06  
• Co-sponsor two Wachusett Earthday Collection events  
• Continue to provide financial assistance for the development of the Collection brochure on a bi-annual basis.  
• Make the Wachusett Earthday Collection brochure available at Sterling Town Hall and other municipal buildings.  
• Advertise the Wachusett Earthday Collection events via Meetinghouse News and the Holden Landmark newspaper  
• Update the Town's web page to include details of the events and links to the Massachusetts Department of Environmental Protection Agency  
• Track the amounts and types of waste collected at each event  
• Track the number of Sterling vehicles that participate in the event. |
| 1-2      | Place Educational Information on Sterling Public Access Television                | Sterling Department of Public Works           | Fall '03, Winter '03/04 – Winter '07/08  
• Broadcast "Save Your Lake" video on Channel 8, the least twice each year during the spring and summer months beginning in the Spring of 2004.  
• Obtain "Oil Leak" & "Fertilizer" PSAs from the Wash Ecology Water Quality Consortium.  
• Track how frequently the PSA's are broadcast on Channel 8 through the end of the permit term. |
| 1-3      | Post Educational Information on the Town’s Official Web Site                      | Sterling Department of Public Works           | Spring '05 – Winter '07/08  
• Post stormwater related information on the Sterling Public Works website.  
• Update website regularly. |
| 1-4      | Promote Water Conservation Practices to Homeowners                               | Sterling Department of Public Works           | Spring/Summer '04, Spring '05 – Winter '07/08  
• Include water conservation information in the Sterling Meetinghouse News twice per year.  
• Post water conservation information on the DPW's website. |
| 1-5      | Publish Educational Information Targeted to Community Businesses                 | Sterling Department of Public Works           | Spring '06  
• Develop an educational press release targeted to the stakeholders of local businesses.  
• Submit press release to the Sterling Meetinghouse News  
• Post the informational press release on the Town's official website. |
## Part III. Summary of Minimum Control Measures

### 1. Public Education and Outreach

<table>
<thead>
<tr>
<th>BMP ID #</th>
<th>BMP Description</th>
<th>Responsible Dept./Person Name</th>
<th>Measurable Goal(s)</th>
<th>Progress on Goal(s) – Permit Year 2 (Reliance on non-municipal partners indicated, if any)</th>
<th>Planned Activities – Permit Year 3</th>
</tr>
</thead>
</table>
| 1-1      | Co-sponsor Biennial Household Hazardous Waste Collection Events | Sterling Department of Public Works | Spring/Fall '03 - Spring/Fall '04 - Spring/Fall '05 - Spring/Fall '06 - Spring/Fall '07  
• Co-sponsor two Wachusett Earthday Collection events each year.  
• Continue to provide financial assistance for the development of the Wachusett Earthday Collection brochure on a bi-annual basis.  
• Make the Wachusett Earthday Collection brochure available to the public at the Sterling Town Hall and other municipal buildings.  
• Advertise the Wachusett Earthday Collection events via press releases to the Sterling Meetinghouse News and the Holden Landmark newspapers.  
• Update the Town’s web page to include details of the Wachusett Earthday Collection events and links to the Massachusetts Department of Environmental Protection (MDEP) and U.S. Environmental Protection Agency (EPA) websites pertaining to household hazardous waste.  
• Track the amounts and types of waste collected at each event.  
• Track the number of Sterling vehicles that participate in the event each. | • Co-sponsored HEPW event w/ the Towns of Boylston, Holden, Paxton, Rutland and West Boylston on May 8, 2004 and October 23, 2004.  
• A news brief advertising the event was placed in the Sterling Meetinghouse News and the Holden Landmark newspaper.  
• Brochures advertising the HEPW Collection Day event were developed and available to the public at the Sterling Town Hall, DPW and other municipal buildings.  
• Approx. 88 Sterling vehicles were counted at this event.  
• See attached summary of amounts and types of waste collected during the 2004 event. | • Activities to proceed as noted in the Measurable Goal’s column. |
| 1-2      | Place Educational Information on Sterling Public Access Television | Sterling Department of Public Works | Fall '03 – Winter '03/04 – Winter '07/08  
• Broadcast “Save Your Lake” video on Channel 8, the public access cable station, at least twice each year during the spring and summer months of the permit term beginning in the Spring of 2004.  
• Obtain “Oil Leak” & “Fertilizer” PSAs from the Washington State Department of Ecology Water Quality Consortium.  
• Track how frequently the PSAs are broadcast on Channel 8 from the Fall of 2003 through the end of the permit term. | • On May 21, 2004 the “Save Your Lake” video was broadcast on Channel 8 four (4) times throughout the day.  
• The “Oil Leak” & “Fertilizer” PSAs were purchased from the Washington State Department of Ecology Water Quality Consortium.  
• From May 9, 2004 thru May 23, 2004, the “Oil Leak” & “Fertilizer” PSAs were broadcast on Channel 8 two (2) times each evening. | • Activities to proceed as noted in the Measurable Goal’s column. |
| 1-3      | Post Educational Information on the Town’s Official Web Site | Sterling Department of Public Works | Spring '05 – Winter 07/08  
• Post stormwater related information on the Sterling Public Services website upon its complete implementation.  
• Update web site regularly. | No Activities planned for Permit Year 2 | No Activities planned for Permit Year 3 |
| 1-4      | Promote Water Conservation Practices to Homeowners | Sterling Department of Public Works | Spring/Summer ‘04, Spring ‘05 – Winter ’07/08  
• Include water conservation information in the Sterling Annual Water-Quality Report.  
• Include water conservation educational information in the DFW Notes section of the Sterling Meetinghouse News two times per year.  
• Post water conservation information on the DFW’s web page. | • Water conservation information was placed in the Sterling 2004 Annual Water-Quality Report.  
• Water conservation educational information was placed in the DFW Notes section of the Sterling Meetinghouse News in the Spring and the Summer of 2004. | • Activities to proceed as noted in the Measurable Goal’s column. |
| 1-5      | Publish Educational Information Targeted to Community Businesses | Sterling Department of Public Works | Spring '06  
• Develop an educational press release targeted to the stormwater management practices of local businesses.  
• Submit press release to the Sterling Meetinghouse News for publishing.  
• Post the informational press release on the Town’s official website. | No Activities planned for Permit Year 2 | No Activities planned for Permit Year 3 |
Part II. Self-Assessment

The Town of Sterling has completed the required self-assessment and has determined that our municipality is in compliance with all permit conditions, except the following provisions:

Part II.F Failed to submit annual report on or before May 1st.
<table>
<thead>
<tr>
<th>1-6</th>
<th>Conduct EnviroScape Demonstrations at Local Schools</th>
<th>Sterling Department of Public Works</th>
<th>Spring '05, Spring '06, Spring '07</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>- Each Spring during the permit term, the Sterling DPW will borrow the EnviroScape watershed/point source model from the MDC office for use in their educational demonstrations.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>- Each year conduct the EnviroScape demonstrations for all fourth grade students at Sterling's public middle school.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>- This activity did not take place this year due to time constraints. It is hoped to be done in 2005.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>- Activities to proceed as noted in the Measurable Goal's column.</td>
</tr>
</tbody>
</table>

1a. Additions

No additions to report.
### 2. Public Involvement and Participation

<table>
<thead>
<tr>
<th>BMP ID #</th>
<th>BMP Description</th>
<th>Responsible Dept./Person Name</th>
<th>Measurable Goal(s)</th>
<th>Progress on Goal(s) – Permit Year 2 (Reliance on non-municipal partners indicated, if any)</th>
<th>Planned Activities – Permit Year 3</th>
</tr>
</thead>
</table>
| 2-1      | Public Access to Draft SWMP & Receipt of Comment | Sterling Department of Public Work | **Summer '03**  
- Make draft SWMP available to the public and conduct public comment period.  
- Finalize SWMP.  
- Make the final SWMP accessible to the public via the Town’s public library and web page. | **No Activities planned beyond Permit Year 1** | **No Activities planned beyond Permit Year 1** |
| 2-2      | Public Access to Annual Report & Receipt of Comment | Sterling Department of Public Work | **Spring '04/05/06/07**  
- Prepare an annual report.  
- Submit an annual report to both the EPA and MA DEP. | **Report was submitted late this year due to lack of sufficient office staff.** | **Activities to proceed as noted in the Measurable Goal’s column.** |
| 2-3      | Provide Support to Local Cleanup Activities | Sterling Department of Public Work | **Spring '04/05/06/07**  
- Draft and distribute an annual letter offering assistance with local cleanup activities to neighborhood associations, homeowner associations, lake associations, and civic groups active in Sterling.  
- Track which entities the letters are sent to each year.  
- Track the number of cleanup activities the DPW assists in conducting each year.  
- Track the number of cleanup participants at each activity the DPW assists in conducting.  
- Track which areas of Town are cleaned by each activity the DPW assists in conducting. | **In May 2004 the Sterling DPW assisted the Sterling Garden Club in conducting a town clean-up day.**  
- Approx. 20 people participated in the effort over several days.  
- The DPW advertised the event, solicited volunteers, provided trash bags for the cleanup and picked up and disposed of the trash collected. | **Activities to proceed as noted in the Measurable Goal’s column.** |

**2a. Additions**

No additions to report.
3. Illicit Discharge Detection and Elimination

<table>
<thead>
<tr>
<th>BMP ID #</th>
<th>BMP Description</th>
<th>Responsible Dept./Person Name</th>
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</tr>
</thead>
<tbody>
<tr>
<td>3-1</td>
<td>Update the Town’s Storm Drain System Map</td>
<td>Sterling Planning Board</td>
<td>Fall ’05 - Winter ’07/08 • Draft and take to Town Meeting an amendment to the Protective Bylaws that would require project proponents for any project regulated by Site Plan Review to submit a copy of the as-builts to the Planning Board in digital format. • Draft an amendment to the Rules and Regulations Governing the Subdivision of Land that would require project proponents to submit a copy of the subdivision’s as-built plans to the Planning Board in digital format. • Adopt the proposed amendment to the Rules and Regulations Governing the Subdivision of Land at a meeting of the Planning Board. • Continuously update the storm drainage system map as new components are added to the municipal storm drainage system. • Conduct an inventory of the unmapped storm drainage facilities and digitize the as-built plans for conversion into a GIS format for inclusion in the Town’s Storm Drainage System Map.</td>
<td>• Goals were revised. No activities took place this year</td>
<td>• Activities to proceed as noted in the Measurable Goal’s column.</td>
</tr>
<tr>
<td>3-2</td>
<td>Adopt a Bylaw Governing Discharges to the Municipal Storm Drain System</td>
<td>Sterling Town Department of Public Works Sterling Conservation Commission Sterling Board of Health</td>
<td>Fall ’05 • Draft the Bylaw Governing Discharges to the Municipal Storm Drainage System. • Take the Bylaw Governing Discharges to the Municipal Storm Drainage System to Town Meeting for acceptance. • Track the number of enforcement actions taken. • Post Bylaw on Town’s web site.</td>
<td>No Activities planned for Permit Year 2</td>
<td>• Activities to proceed as noted in the Measurable Goal’s column.</td>
</tr>
<tr>
<td>3-3</td>
<td>Implement an Illicit Discharge Detection and Elimination Plan</td>
<td>Sterling Department of Public Works</td>
<td>Spring ’06 - Winter ’07/08 • Develop an Illicit Discharge Detection and Elimination Plan. • Conduct dry-weather field screening of outfalls and track the number of surveys indicating a possible illicit connection. • Trace the source of potential illicit discharges. • Track the number of illicit connections found. • Track the number of illicit connections repaired/replaced. • Report on the success of obtaining alternative funding to assist in illicit connection removal.</td>
<td>No Activities planned for Permit Year 2</td>
<td>No Activities planned for Permit Year 3</td>
</tr>
<tr>
<td>3-4</td>
<td>Establish a Formal Septic System Management Program (SSMP)</td>
<td>Sterling Board of Health</td>
<td>Fall ’03 - Winter ’07/08 • Track the number of septic system pumping companies licensed by the Town each year. • Track the number of septic system installers that are licensed by the Town each year. • Track the number of Certificates of Compliance issued each year. • Track the number of failed septic systems identified each year and action taken. • Track the number of property owners that participate in the Septic System Repair Loan Program (SSRLP).</td>
<td>• <em>13</em> septic system pumping companies were licensed by the Town in 2004. • <em>34</em> septic system installers that were licensed by the Town in 2004. • <em>2</em> Certificates of Compliance were issued in 2004. • In 2004 <em>39</em> septic systems were identified as having failed and were repaired in 2004. • <em>4</em> property owners participated in the SSRLP in 2004.</td>
<td>• Activities to proceed as noted in the Measurable Goal’s column.</td>
</tr>
</tbody>
</table>

3a. Additions

No additions to report.
### 4. Construction Site Stormwater Runoff Control

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<thead>
<tr>
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<th>Planned Activities – Permit Year 3</th>
</tr>
</thead>
</table>
| 4-1      | Adopt a Stormwater Management and Land Disturbance Bylaw | Sterling Conservation Commission                | Spring '06  
- Draft the Stormwater Management and Land Disturbance Bylaw.  
- Take the Stormwater Management and Land Disturbance Bylaw to Town Meeting for acceptance.  
- Track the number of enforcement actions taken.  | No Activities planned for Permit Year 2            | No Activities planned for Permit Year 3                                                  |
| 4-2      | Develop a Site Inspection Form and Conduct Site Inspections | Sterling Conservation Commission                | Spring '06 – Winter '07/08  
- Develop a Site Inspection Form that reflects the ESCP requirements.  
- Track the frequency of inspections conducted for each site.  
- Track the completion of Inspection forms.  
- Track the number of failed ESC BMPs discovered on each site.  | No Activities planned for Permit Year 2            | No Activities planned for Permit Year 3                                                  |
| 4-3      | Develop and Implement a Citizen Complaint Hotline     | Sterling Conservation Commission                | Spring '06  
- Establish the Citizen Complaint Hotline.  
- Advertise the Citizen Complaint Hotline.  
- Track the number of complaints received via the Citizen Complaint Hotline.  
- Track the problems/indicents remedied as a result of the Citizen Complaint Hotline.  | No Activities planned for Permit Year 2            | No Activities planned for Permit Year 3                                                  |

#### 4a. Additions

No additions to report.
## 6. Pollution Prevention and Good Housekeeping in Municipal Operations

<table>
<thead>
<tr>
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<th>Planned Activities – Permit Year 3</th>
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</thead>
</table>
| 6-1      | Develop a Formal Training Program for DPW Staff | Sterling Department of Public Works Superintendent | Spring '05 – Winter '07/08  
- Develop the DPW employee-training manual.  
- Conduct training sessions with all current employees.  
- Train all new DPW employees in accordance with the training manual.  
- Track employees trained in accordance to the training manual.  
- Conduct refresher training for employees after every two years of employment. | No Activities planned for Permit Year 2 | Activities to proceed as noted in the Measurable Goal’s column. |
| 6-2      | Formalize the Catch Basin Cleaning Program | Sterling Department of Public Works | Summer '03 – Winter '07/08  
- Clean all municipal catch basins a minimum of once every three-year period.  
- Document catch basin cleaning activities. | • During 2004 approximately 33.3% of the Town’s catch basins were cleaned.  
- An accurate log of catch basin cleaning activities was completed and is filed at the DPW facility. | Activities to proceed as noted in the Measurable Goal’s column. |
| 6-3      | Maintain Municipally Operated Structural BMPs | Sterling Department of Public Works | Spring '05/06/07  
- Conduct an inventory of municipally maintained structural BMPs.  
- Clean municipally maintained structural BMPs on an as needed basis.  
- Track maintenance activities conducted for each structural BMP.  
- Once a year, place a notice in the DPW Notes section of the Sterling Meetinghouse News that informs residents that any maintenance requests for municipally maintained detention basins located within their subdivisions should be directed to the Department of Public Works. | No Activities planned for Permit Year 2 | Activities to proceed as noted in the Measurable Goal’s column. |
| 6-4      | Formalize the Existing Parking Lot and Street Sweeping Program | Sterling Department of Public Works | Summer '03 – Winter '07/08  
- Sweep all municipal streets and parking lots a minimum of once per year.  
- Maintain an accurate log of streets swept, sweepings collected and method of disposal.  
- Re-evaluate storage practices and make improvements in order to ensure compliance with the MADEP BWP Reuse and Disposal of Street Sweepings Policy by the end of the permit term.  
- Update inventory of municipal streets and parking lots as needed. | • All municipal streets and parking lots were swept a minimum of once during 2004.  
- An accurate log of streets swept, sweepings collected and method of disposal was completed and is filed at the DPW facility.  
- The street sweeping tracking sheets were updated and the inventory of municipal streets and parking lots were revised. | Activities to proceed as noted in the Measurable Goal’s column. |
| 6-5      | Develop a Vehicle & Equipment Maintenance Policy | Sterling Department of Public Works | Winter 05  
- Develop and implement a vehicle and equipment maintenance policy and incorporate policy requirements into the DPW employee-training program. | • Goals have been revised | Activities to proceed as noted in the Measurable Goal’s column. |
| 6-6      | Develop a Vehicle & Equipment Cleaning Policy | Sterling Department of Public Works | Winter '04/05  
- Develop and implement a vehicle and equipment cleaning policy that works toward complying with the Massachusetts DEP’s upcoming vehicle washing policy.  
- Incorporate policy requirements into the DPW employee-training program and provide to the Town’s Police Department and Fire Department. | • A new garage facility is currently being designed which will incorporate a recycled water wash bay. Construction is expected to start in Spring 06 | Activities to proceed as noted in the Measurable Goal’s column. |
| 6-7      | Develop a Landscape and Lawn Care Policy | Sterling Department of Public Works | Winter 05  
- Develop and implement a landscape and lawn care policy.  
- Incorporate the policy requirements into the DPW employee-training program. | • Goals have been revised | Activities to proceed as noted in the Measurable Goal’s column. |
Attachment A

Household Hazardous Waste Collection Days May & October 2004

<table>
<thead>
<tr>
<th>Units</th>
<th>Description</th>
<th>Quantity Collected</th>
<th>Per Container Cost/DES</th>
<th>Total Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>55</td>
<td>Resin &amp; Adhesive</td>
<td>5</td>
<td>$375</td>
<td>$1,875</td>
</tr>
<tr>
<td>55</td>
<td>Consolidated Paint Liquid</td>
<td>8</td>
<td>$150</td>
<td>$1,200</td>
</tr>
<tr>
<td>55</td>
<td>Consolidated Paint Sludge</td>
<td>4</td>
<td>$250</td>
<td>$1,000</td>
</tr>
<tr>
<td>55</td>
<td>Aerosol Cans</td>
<td>4</td>
<td>$385</td>
<td>$1,540</td>
</tr>
<tr>
<td>220</td>
<td>Paint in Cans</td>
<td>4</td>
<td>$550</td>
<td>$2,200</td>
</tr>
<tr>
<td>55</td>
<td>Pesticides Lab Packs</td>
<td>5</td>
<td>$375</td>
<td>$1,875</td>
</tr>
<tr>
<td>55</td>
<td>Glycol/Cleaners</td>
<td>2</td>
<td>$150</td>
<td>$300</td>
</tr>
<tr>
<td>55</td>
<td>Inorganic Acid Lab Pack</td>
<td>1</td>
<td>$375</td>
<td>$375</td>
</tr>
<tr>
<td>55</td>
<td>Oxidizer Lab Pack</td>
<td>1</td>
<td>$375</td>
<td>$375</td>
</tr>
<tr>
<td>55</td>
<td>Inorganic Base Lab Pack</td>
<td>1</td>
<td>$375</td>
<td>$375</td>
</tr>
<tr>
<td>55</td>
<td>Cyanide Lab Pack</td>
<td>1</td>
<td>$375</td>
<td>$375</td>
</tr>
<tr>
<td>14</td>
<td>Gallon Lab Pack Chemicals</td>
<td>2</td>
<td>$100</td>
<td>$200</td>
</tr>
<tr>
<td>30</td>
<td>Waste Oil</td>
<td>1</td>
<td>$100</td>
<td>$100</td>
</tr>
<tr>
<td>20</td>
<td>Waste Oil Overpacked</td>
<td>1</td>
<td>$125</td>
<td>$125</td>
</tr>
<tr>
<td>40</td>
<td>Waste Oil Overpacked</td>
<td>1</td>
<td>$125</td>
<td>$125</td>
</tr>
<tr>
<td>20</td>
<td>Hydrochloric Acid</td>
<td>1</td>
<td>$95</td>
<td>$95</td>
</tr>
</tbody>
</table>

Total 51

Set Up Fee $1,500
Total Cost $15,585