Town of Billerica



NPDES PII Small MS4 General Permit Annual Report

(MA041182) (W-040980)

YEAR 6

Prepared by:

The Town of Billerica
Department of Public Works
Engineering Division
365 Boston Road
Billerica, Massachusetts 01821

Municipality/Organization: Town of Billerica

EPA NPDES Permit Number: MA041182

Mass DEP Transmittal Number: W-040980

Annual Report Number
& Reporting Period: No. 6: April 1, 2008 – March 31, 2009

NPDES PII Small MS4 General Permit Annual Report

(Due: May 1, 2009)

Part I. General Information

Contact Person	: Kelley Conway	Title: Town Engineer
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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	: Well FWilliami
Printed N	ame: William F. Williams
Title:	Town Manager
Date:	april 30, 2009

Part II. Self-Assessment

The Town of Billerica has completed the required self-assessment and has determined that our municipality is in compliance with permit conditions.

Planned activities for the next permit term have not been designated unless a BMP under this permit term was not fully completed or is an ongoing effort. Once the General Permit for the next five years is available from EPA, the Town will prepare and submit a Notice of Intent to MassDEP and EPA for compliance with the new General Permit.

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 6 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Next Permit
1.3.1	Partner with local organization	Engineering	Partner with one organization each year.	Continued support with SuAsCo. Partnered with Central Massachusetts Mosquito Control Project.	BMP Complete
1.3.2	Public Education Materials	BOH & DPW	Stormwater brochures available at Town offices and booth at Health Fair	A variety of brochures and books are available at various offices around town (Water Dept, Conservation, DPW, BOH). Stormwater info included in annual water	BMP Complete
Revised			Treatm Tan	report and distributed to all town residents and businesses. New stormwater bulletin board installed at Town Hall. Participated in the Health and Recreation Fair on 4/12/08.	
1.3.3 Revised	Local schools education program	School Dept.	Present stormwater to two schools each year.	Partnered with Woodard and Curran and the Ditson School to participate in World Water Monitoring Day. Partnered with local resident to participate in EnviroScapes watershed modeling with Middle School Students at the Locke Middle School and the Health & Recreation Fair.	BMP Complete
1.3.4 Revised	Stormwater Web Page	Engineering	Develop stormwater web page	Web page continually updated with additional links and information. Stormwater Ads presentation added to website. Annual Report available for viewing. http://www.billericadpw.org	BMP Complete
1.3.5	Cable Access TV Show	Engineering	Select a stormwater program for viewing on BATV.	Reining in the Storm: One Building at a Time (Massachusetts Editions) from the North & South Rivers Watershed Association DVD was played on Billerica	BMP Complete
Revised				Access TV multiple times. Stormwater Ads powerpoint presentation also played on BATV multiple times.	

BMP ID#	BMP Description Public Access GIS Tool	Responsible Dept./Person Name Engineering	Measurable Goal(s) Provide public access	Progress on Goal(s) – Permit Year 6 (Reliance on non-municipal partners indicated, if any) GIS Analyst on staff to coordinate the	Planned Activities – Next Permit Determine maps that should be
1.3.6			to maps of streams, rivers, storm drains and water quality data by Year 5.	implementation of Web GIS for public use. Provided online access to several maps including the Green Engineering Flood Plain maps and the Stormwater	available for public use and provide public access in the future.
Revised				system map through the Billerica DPW website.	
1.4.1 Revised	Stormwater flyer to residents	SuAsCo & DPW	No Goal(s) for Yr. 6	N/A	BMP Complete
1.4.2 Revised	Stormwater lesson plan	SuAsCo & DPW	No Goal(s) for Yr. 6	N/A	BMP Complete
1.4.3 Revised	Media toolkit and stormwater PowerPoint program	SuAsCo & DPW	Media Packet to local Media	Presented Stormwater Power Point Program to public at the Health and Recreation Fair on 4/12/08.	BMP Complete
1.4.4	Business Flyer & Storm Drain Marking	SuAsCo & DPW	Stormwater flyer to 50% of Town businesses	Mailed 'Stormwater Matters' business flyer to local businesses in May 2008. Continued storm drain marking program. Drains marked on school	BMP Complete
				properties by Middle School students.	
1.4.5 Revised	Stormwater Outreach Materials	SuAsCo & DPW	No Goal(s) for Yr. 6	Stormwater posters and postcards distributed to different Town departments for handout and display. Stormwater Ads powerpoint presentation played on BATV several times.	BMP Complete

2. Public Involvement and Participation

BMP ID#	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 6 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Next Permit
2.3.1 Revised	Partner / Support a Watershed Organization	Engineering	Partner with one local organization each year.	Continued partnership with SuAsCo. Participated in Organization for the Assabet River (OAR) Workshop on 3/28/09.	BMP Complete
2.3.2	Storm drain stenciling program	Engineering	Develop & Implement drain marking program	Continued with storm drain marking program. Volunteers installed storm drain markers in their neighborhood and on school properties.	BMP Complete
2.3.3 Revised	Stormwater Public Meetings Program	Engineering	Discuss stormwater at one or more public meetings each year	A Board of Health meeting was held on March 9, 2009 where the Board discussed the Stormwater Management Regulations.	The Board of Health plans to hold the Public Hearing to adopt the regulations this Spring/Summer.
2.3.4 Revised	Substitute 2.3.7	DPW	Substitute 2.3.7	N/A	BMP Complete
2.3.5	Recreation Department Public Education Program	Engineering	Involve Recreation Department in stormwater public education program each year.	Posters and postcards given to Recreation Dept for display and handout. Continue to involve recreational department and identify opportunities for public involvement.	BMP Complete
Revised					

BMP ID#	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 6 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Next Permit
2.3.6	Annual "Clean the Stream" program	Recreation	Recruit volunteers for each years' stormwater cleaning effort	Held annual Town wide "Clean-up/ Green-up" event. Contracted with the Commonwealth of Massachusetts Middlesex Sheriffs Office for assistance	BMP Complete
Revised				with cleaning and preparations of parks, playgrounds, and beach. Contracted with Central Massachusetts Mosquito Control Project to clean 3,705' of streams and 45 culverts. On 9/13/08 a group of volunteers worked with OAR to clean up portions of the Concord River.	
2.3.7 Revised	Develop Stormwater By-Law Advisory Group	Stormwater By- Law Working Group	Hold 1 or more meetings with Advisory Group	BMP Complete	BMP Complete
2.4.1 Revised	Stormwater traveling display	SuAsCo & DPW	No Goal(s) for Yr. 6	Display used annually at the Health and Recreation Fair.	BMP Complete
2.4.2 Revised	Stormwater poster contest	SuAsCo & DPW	Poster contest winners selected	Year 3 product eliminated by SuAsCo	N/A
2.4.3 Revised	Stormwater photo contest	SuAsCo & DPW	Photo contest advertised	Year 3 product eliminated by SuAsCo	N/A
2.4.4 Revised	Stormwater summit special event	SuAsCo & DPW	Promote stormwater summit	BMP Complete	BMP Complete
2.4.5	Stormwater super summit	SuAsCo & DPW	Host or attend watershed wide super summit	BMP Complete	BMP Complete
Revised					

3. Illicit Discharge Detection and Elimination

BMP ID#	BMP Description	Responsible Dept./Person	Measurable Goal(s)	Progress on Goal(s) – Permit Year 6	Planned Activities – Next Permit
		Name		(Reliance on non-municipal partners	
				indicated, if any)	
	Asset Management	Engineering	Develop stormwater	Developed asset management program	BMP Complete
3.4.1	Program		Asset Management	to track public complaints, catch basin	
			program.	cleaning efforts, and drainage repairs.	
Revised				Coordinated with Highway Division	
				regarding implementation of the catch basin O&M forms.	
	Storm Drain Map	Engineering	GPS field effort of	All of the Town's outfalls have been	Continue to verify accuracy and
3.4.2			drainage structures.	mapped. Continue to verify accuracy	completeness of consultant's drain
Revised				and completeness of consultant's drain	map.
				map. Efforts not complete.	
	TMDL, Critical Habitat,	Engineering	Monitor changes in	Assessed critical habitats and historic	BMP Complete
3.4.3	Historic Property		TMDL, Critical	sites and found no change. Reviewed	
			Habitat & Historic Site	the Bacteria for Shawsheen River Basin	
Revised				report and the <i>Draft Pathogen TMDL</i>	
				for the Concord River Watershed	
				report. Created plan to summarize	
				Town actions to address TMDL	
				recommendations and recommended future actions.	
	Ctommonton Dev I on	Board of Health	Danielan etamorratan		DMD Complete
3.4.4	Stormwater By-Law	Board of Health	Develop stormwater requirements regulated	The "By-law Governing Discharges to the Municipal Storm Sewer System"	BMP Complete
3.4.4			by Board of Health	has been adopted as Article XXVI in	
Revised			by Board of Hearth	the Town's General By-laws.	
110 / 1500				the Town's General By-laws.	
	Illicit Discharge	DPW	Develop phased illicit	Based on results of dry weather	BMP Complete
3.4.5	Detection Program		discharge detection	sampling conducted in 2005, 6 outfalls	r
			program.	were resampled to confirm presence of	
				an illicit connection. Follow-up of the	
Revised				possible illicit connection was	
				performed. Nothing found.	

BMP ID#	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 6 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Next Permit
3.4.6 Revised	Illicit Discharge Elimination Program	Board of Health	Enforce illicit discharges by-law	The "By-law Governing Discharges to the Municipal Storm Sewer System" has been adopted as Article XXVI in the Town's General By-laws.	Enforce the new by-law by responding to public complaints and through ongoing illicit discharge detection activities by the DPW
3.4.7	Resident education program	DPW	Develop and distribute fliers defining illicit discharges and summarizing the Town Stormwater Regulations	Text regarding the new stormwater management by-laws was included in the annual Water Quality Report which is distributed to all Town Residents. Information regarding the by-laws has been placed on the DPW website and is	BMP Complete
Revised				available at the Board of Health for viewing.	

4. Construction Site Stormwater Runoff Control

BMP ID#	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 6 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Next Permit
4.2.1 Revised	Regulatory Controls	Board of Health	Develop "Erosion & Sediment Control" by- law	Erosion and sediment control was incorporated into the Stormwater Management By-law which was adopted as Article XXV in the Town's General By-Laws.	BMP Complete
4.2.2	Review and site inspection procedures	Board of Health	Sanctions developed and included in regulations to ensure compliance	Construction site review and site inspection procedures are included in the Stormwater Management By-law and in the draft Stormwater Management Regulations.	The draft Stormwater Management Regulations are under review. The Board of Health plans to hold the Public Hearing to adopt the regulations this Spring/Summer.
4.2.3	Enforcement procedures	Board of Health	Develop and implement enforcement procedures and sanctions for stormwater violators	Enforcement procedures and sanctions for stormwater violators are included in the Stormwater Management By-law and in the draft Stormwater Management Regulations.	The draft Stormwater Management Regulations are under review. The Board of Health plans to hold the Public Hearing to adopt the regulations this Spring/Summer.
4.2.4 Revised	Procedures for Handling Public Comments	DPW	Develop & implement public comment procedure	Currently using the DPW website to receive comments.	Continue to work with other Departments to track these.

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 6 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Next Permit
5.3.1 Revised	Structural stormwater controls	Planning Board	Revise subdivision rules and regulations with new BMP's	N/A. Completed Year 2.	BMP Complete
5.3.2 Revised	Local By-Laws	Stormwater By- Law Working Group	Develop General By- Law	The Stormwater Management By-law was adopted as Article XXV in the Town's General By-laws. By-law addresses post-construction stormwater management.	BMP Complete
5.3.3 Revised	Planning Strategies	Engineering	Review Current Town Master Plan	Draft stormwater management language sent to Planning Division for insertion with the next version of the Master Plan. Language includes a write-up on how the Town's Stormwater Management Program protects water resources, mitigates non- point source pollution, and protects sensitive areas from development.	BMP Complete
5.3.4	Conditions for private stormwater systems	ВОН	Develop maintenance requirements for private stormwater systems	The Stormwater Management By-law was adopted as Article XXV in the Town's General By-laws. The By-law addresses post-construction stormwater management. The draft Stormwater	The draft Stormwater Management Regulations are under review. The Board of Health plans to hold the Public Hearing to adopt the regulations this Spring/Summer.
Revised				Management Regulations include operation and maintenance requirements for private stormwater systems.	
5.3.5 Revised	Stormwater infrastructure inspection program	Engineering	Develop technology based inspection program	Working to implement the asset management program to track BMP Maintenance.	BMP Complete

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 6 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Next Permit
6.3.1 Revised	Pollution Prevention Planning	Highway Dept.	Develop a Stormwater Pollution Prevention Plan	Stormwater Pollution Prevention Plan (SWPPP) distributed to all applicable Town offices. Plan includes BMP fact sheets applicable to the Town's municipal operations. Vehicle washing program implemented for DPW. Vehicles to be washed once/week at professional car wash.	BMP Complete
6.3.2 Revised	Employee Training Program	DPW	Implement employee training program	Training workshop was held on April 15, 2008. Facility managers attended workshop and signed a training workshop attendance sheet to track attendance. Participated in several US EPA Stormwater Webcast Series Events.	BMP Complete
6.3.3	Recycling Program	Highway Dept.	Monitor recycling program & enhance if necessary	Annual hazardous waste day and continuously operated oil recycling program available on monthly basis.	BMP Complete
Revised				2009 Recycling and Trash Collection Guide distributed to residents and available on the DPW website http://www.billericadpw.org . Rain barrels made available for Billerica residents to purchase in May 2008 at a discounted price from The New England Rain Barrel Company.	
6.3.4	Catch Basin Cleaning Program	Highway Dept.	Clean catch basins each year and monitor pounds of sediment removed.	Cleaned Town catch basins in 2008. Have implemented catch basin cleaning form for contractor to fill out in order to assess heavily sedimented catch	BMP Complete
Revised				basins for 2009	

BMP ID#	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 6 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Next Permit
6.3.5 Revised	Street Sweeping Program	Highway Dept.	Sweep Streets each year and monitor pounds of sediment removed.	Street sweeping of all Town roadways was conducted from May thru Sept 2008. Highway Division began monitoring sediment removed.	BMP Complete
6.3.6 Revised	Operations and Maintenance	DPW	Inventory ongoing stormwater maintenance activities	Performed updates to SWPPP for all Town facilities.	BMP Complete
6.3.7	Reporting	DPW	Continue to track stormwater management activities and submit annual report	Continued to track stormwater management activities and submitted annual report.	BMP Complete
Revised					

6a. Additions

BMP	BMP Description	Responsible	Measurable Goal(s)	Progress on Goal(s) -	Planned Activities –
ID#		Dept./Person		Permit Year 6	Next Permit
		Name		(Reliance on non-municipal partners	
				indicated, if any)	
	Mosquito Control	Engineering	Record of improved	Through the efforts of the Central	BMP Complete
6.3.8	Project & Drainage		drainage system	Massachusetts Mosquito Control	
	System Maintenance		inspection and	Project, brush and other accumulated	
			maintenance.	debris was removed from culverts and	
Revised				streams. Efforts also included insertion	
				of larvacides in Town catch basins.	

7. BMPs for Meeting Total Maximum Daily Load (TMDL) Waste Load Allocations (WLA)

BMP	BMP Description	Responsible	Measurable Goal(s)	Progress on Goal(s) -	Planned Activities –
ID#		Dept./Person		Permit Year 6	Next Permit
		Name		(Reliance on non-municipal partners	
				indicated, if any)	
	Monitor Current	DPW	Continue to	Reviewed the Bacteria for Shawsheen	BMP Complete
7.2.1	Impairment Lists		monitor TMDL	River Basin report and the Draft	
			studies annually and	Pathogen TMDL for the Concord River	
			develop programs as	Watershed report. Created plan to	
			appropriate.	summarize Town's actions to address	
Revised				TMDL recommendations and	
				recommended future actions.	

7b. WLA Assessment

Billerica's MS4 discharges into the Shawsheen River, which has an approved Final TMDL for Bacteria. Because the TMDL is for a pollutant likely to be found in stormwater discharges from Billerica's MS4, their Stormwater Management Program includes BMPs that address the waste load allocation (WLA) from point sources that include illicit connections to the drainage system and urban stormwater runoff. Billerica is making steady progress towards meeting the Shawsheen River Fecal Coliform WLAs through implementation of a number of existing stormwater control measures, as reported in the above Annual Report, that address pollutants of concern in water quality impaired waters.

To address Illicit Sewer Connections WLA, the Town has implemented the following BMPs under the Illicit Discharge Detection and Elimination Minimum Control Measure:

- Asset Management Program including improvements in Billerica's public complaint response and tracking (BMP 3.4.1);
- Storm Drain Mapping (BMP 3.4.2);
- Stormwater By-law that addresses illicit discharges and illegal dumping, adopted at the October 2007 Town Meeting (BMP 3.4.4);
- Illicit Discharge Detection Program, which is ongoing (BMP 3.4.5);
- Illicit Discharge Elimination Program, now enforceable by the Board of Health through the new stormwater by-law (BMP 3.4.6); and
- Resident Education (BMP 3.4.7).

To address the Urban Stormwater Runoff WLA, the Town has implemented the following BMPs in the Stormwater Management Program:

- Construction Site Runoff Control through Billerica's Stormwater Management Bylaw, adopted at the October 2007 Town Meeting (BMPs 4.2.1, 4.2.2 and 4.2.3);
- Post-construction Stormwater Management through Billerica's Stormwater Management Bylaw (BMPs 5.3.2 and 5.3.4); and
- Catch Basin Cleaning and Street Sweeping Programs to keep debris from filling catch basins and maintain proper drainage system function (BMPs 6.3.4 and 6.3.5).

In addition, Billerica has a leash law with "pooper-scooper" provisions in General By-laws, Article VII, Section 2 - Regulation of Dogs, pet stations for proper pet waste disposal, and the Board of Health regulates the design, construction, and inspection of septic systems and leach fields.

Pathogen TMDL for the Concord River Watershed is still draft and has not been approved. The Town does not plan to add any additional BMPs to meet TMDL requirements at this time. Billerica's plan to meet watershed specific TMDL requirements is described in detain in the March 2008 memorandum entitled, *Best Management Practices to Address Shawsheen and Concord River TMDLs*, on file at the Engineering Office.

Part IV. Summary of Information Collected and Analyzed

N/A

Part V. Program Outputs & Accomplishments (OPTIONAL)

(Since beginning of permit coverage unless specified otherwise by a **, which indicates response is for period covering April 1, 2008 through March 31, 2009)

Programmatic

	(Preferred Uni	its) Response
Stormwater management position created/staffed	(y/n)	Yes
Annual program budget/expenditures **	(\$)	\$ 272,409
Total program expenditures since beginning of permit coverage	(\$)	\$ 1,164,326
Funding mechanism(s) (General Fund, Enterprise, Utility, etc)		Town Meeting
		Appropriation,
		Operational
		Budget and
		General Fund

Education, Involvement, and Training

Estimated number of property owners reached by education program(s)	(# or %)	100%	
Stormwater management committee established	(y/n)	Yes	
Stream teams established or supported	(# or y/n)	Yes	
Shoreline clean-up participation or quantity of shoreline miles cleaned **	(y/n or mi.)	.75 mi	
Shoreline cleaned since beginning of permit coverage	(mi.)	4.45 mi	
Household Hazardous Waste Collection Days			
days sponsored **	(#)	12	
 community participation ** 	(# or %)	538	

■ material collected **	Oil	(tons or gal)	1,280 gal
	Flammables		2.88 tons
	Oxidizers		0.076 tons
	Pesticides		0.70 tons
	Corrosives		0.325 tons
	Other		2.5 tons
			165 gallons
	Mercury		.001 tons
School curricula implemented	•	(y/n)	Partial

Legal/Regulatory

	In Place	Reviewing		Draft	
	Prior to	Existing		in	
	Phase II	Authorities	Drafted	Review	Adopted
Regulatory Mechanism Status (indicate with "X")					
 Illicit Discharge Detection & Elimination 					X
Erosion & Sediment Control					X
Post-Development Stormwater Management					X
Accompanying Regulation Status (indicate with "X")					
 Illicit Discharge Detection & Elimination 					N/A
 Erosion & Sediment Control 				X	
 Post-Development Stormwater Management 				X	

Mapping and Illicit Discharges

	Preferred Units	s) Response
Outfall mapping complete	(%)	100
Estimated or actual number of outfalls	(#)	467
System-Wide mapping complete (complete storm sewer infrastructure)	(%)	100
Mapping method(s)		
Paper/Mylar	(%)	
■ CADD	(%)	
• GIS (Note: 86% of structured located with GPS. 14% converted to GIS from existing maps.)	(%)	100
Outfalls inspected/screened **	(# or %)	6

Outfalls inspected/screened (Since beginning of permit coverage)	(# or %)	100%
Illicit discharges identified **	(#)	0
Illicit discharges identified (Since beginning of permit coverage)	(#)	0
Illicit connections removed **	(#); and	0
	(est. gpd)	
Illicit connections removed (Since beginning of permit coverage)	(#); and	0
	(est. gpd)	
% of population on sewer	(%)	76
% of population on septic systems	(%)	24

Construction

	(Preferred Units)	Response
Number of construction starts (>1-acre) **	(#)	
Estimated percentage of construction starts adequately regulated for erosion and sediment control **	(%)	
Site inspections completed **	(# or %)	
Tickets/Stop work orders issued **	(# or %)	
Fines collected **	(# and \$)	
Complaints/concerns received from public **	(#)	

Post-Development Stormwater Management

Estimated percentage of development/redevelopment projects adequately regulated for post-	(%)	
construction stormwater control		
Site inspections (for proper BMP installation & operation) completed **	(# or %)	
BMP maintenance required through covenants, escrow, deed restrictions, etc.	(y/n)	Yes
Low-impact development (LID) practices permitted and encouraged	(y/n)	Yes

Operations and Maintenance

Average frequency of catch basin cleaning (non-commercial/non-arterial streets) **	(times/yr)	1
Average frequency of catch basin cleaning (commercial/arterial or other critical streets) **	(times/yr)	1
Qty of structures cleaned **	(#)	1500
Qty. of storm drain cleaned **	(%, LF or	
	mi.)	
Qty. of screenings/debris removed from storm sewer infrastructure **	(lbs. or tons)	169 ton
Disposal or use of screenings (landfill, POTW, compost, beneficial use, etc.) **	(location)	Landfill

Basin Cleaning Costs		
Annual budget/expenditure (labor & equipment)**	(\$)	37,230
Hourly or per basin contract rate **	(\$/hr or \$ per basin)	\$24.82 per basin
Disposal cost**	(\$)	Included in above cost
Cleaning Equipment		
Clam shell truck(s) owned/leased	(#)	2
Vacuum truck(s) owned/leased	(#)	1
Vacuum trucks specified in contracts	(y/n)	No
% Structures cleaned with clam shells **	(%)	99
% Structures cleaned with vactor **	(%)	1

(Preferred Units) Response Average frequency of street sweeping (non-commercial/non-arterial streets) ** (times/yr) Average frequency of street sweeping (commercial/arterial or other critical streets) ** 2-3 (times/yr) Qty. of sand/debris collected by sweeping ** Approximately (lbs. or tons) 1,300,000 lbs Disposal of sweepings (landfill, POTW, compost, beneficial use, etc.) ** Landfill (BFI) (location) **Annual Sweeping Costs** • Annual budget/expenditure (labor & equipment)** (\$) • Hourly or lane mile contract rate ** (\$/hr. or n/a ln mi.) • Disposal cost** (\$) n/a Sweeping Equipment • Rotary brush street sweepers owned/leased (#) 3 (#) 0 • Vacuum street sweepers owned/leased • Vacuum street sweepers specified in contracts (y/n)No % • % Roads swept with rotary brush sweepers ** 100 • % Roads swept with vacuum sweepers ** % 0

Reduction (since beginning of permit coverage) in application on public land of:	
("N/A" = never used; "100%" = elimination)	
■ Fertilizers	(lbs. or %)
 Herbicides 	(lbs. or %)
Pesticides	(lbs. or %)
Integrated Pest Management (IPM) Practices Implemented	(y/n)
_	

% NaCl % CaCl ₂ % MgCl ₂ % CMA % Kac	99.0% 0 0.5% 0
% MgCl ₂ % CMA	0.5%
% CMA	
	0
% Kac	1
	0
% KCl	0
% Sand	0.5%
(y/n or %)	No
(y/n or %)	No
(y/n or %)	No
(±lbs/ln mi.	n/a
or %)	
(±lbs/ln mi.	n/a
or %)	
(%)	100
(y/n or #)	No (In place)
(y/n)	Yes
	% Sand (y/n or %) (y/n or %) (y/n or %) (±lbs/ln mi. or %) (±lbs/ln mi. or %) (%) (%) (y/n or #)

Water Supply Protection

Storm water outfalls to public water supplies eliminated or relocated	# or y/n	No
Installed or planned treatment BMPs for public drinking water supplies and their protection areas	# or y/n	No
Treatment units induce infiltration within 500-feet of a wellhead protection area	# or y/n	No