



TOWN OF FRAMINGHAM
DEPARTMENT OF PUBLIC WORKS
ENGINEERING & TRANSPORTATION DIVISION

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APR 20 2009

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April 14, 2009

Ms. Glenda Velez
US EPA - CIP
1 Congress St, Suite 1100
Boston, MA 02114

Re: NPDES PII Small MS4 General Permit Annual Report (Year 6)

Dear Ms. Velez,

Attached, please find the NPDES PII Small MS4 General Permit Year 6 Annual Report for the Town of Framingham. This is submitted to meet this year's reporting requirement for the NPDES Phase II Municipal Separate Storm Sewer System General Permit (Permit No. MA R041116). In addition, to meet the permit requirements, I am also sending a copy to Mr. Frederick Civian of the Massachusetts Department of Environmental Protection.

If you have any questions, feel free to contact me at 508-532-6020 or krw@framinghamma.gov.

Yours very truly,

Katherine R. Weeks, P.E.
Senior Stormwater & Environmental Engineer

KRW/lmp

cc: Julian Suso, Town Manager
Frederick Civian, MA DEP
Peter Sellers, Director, Department of Public Works
William Sedewitz, Director of Engineering and Transportation, Department of Public Works
Tom Holder, Deputy Director, Department of Public Works
Nancy Bryant, SuAsCo

Cover Letter Year 6 report.doc

Municipality/Organization: Town of Framingham

EPA NPDES Permit Number: MA R041116

MaDEP Transmittal Number: W-041299

**Annual Report Number
& Reporting Period:** No. 6: March '08 – March '09

NPDES PII Small MS4 General Permit Annual Report

Part I. General Information

Contact Person: Julian Suso Title: Town Manager

Telephone #: 508-532-5400 Email: Julian.Suso@Framinghamma.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: Julian Suso

Title: Town Manager

Date: 4/13/09

Part II. Self-Assessment

The Town of Framingham has completed the required self-assessment for Permit Year Six and finds that our municipality is in compliance in general with the permit conditions. The Illicit Discharge Detection and Elimination (IDDE) by-law and regulation amendment to the Town's General Bylaws on April 30, 2008. Accompanying regulations were developed and approved by participating departments (Conservation Commission, Board of Health, Inspectional Services, and Public Works) in the spring and fall of 2008. The Board of Selectmen approved the regulations on January 27, 2009. The bylaw and regulations took effect since a press release sent out on January 29, 2009 resulted in an article in *The Metrowest Daily News*.

The first phase of the Town's Stormwater Master Plan was completed November 2008. It addresses issues and recommendations for two sub-basins with the most difficult problems and therefore the highest priority for implementing improvements: Dam Brook and Farm Pond Sub-Basins. The plan looks at the hydrology of the watershed in these sub-basins, the causes of the problems, and potential solutions for problems of flooding, capacity, water quality, and recharge. The Town has implemented or approved the recommended projects to provide a pump support structure at Eames Brook, and plans to proceed with the remaining projects as funds become available. The second phase of the SWMP will also be conducted as funds become available and address the remaining high-priority sub-basins of Angelica Brook, Jacobs Brook, Lokerville, Cochituate Brook, and Sucker Brook.

In addition, the Town developed a Stormwater Management Plan (SWMP), currently in draft version. The plan outlines the policies and procedures under which the Department of Public Works (DPW) operates and maintains the Town's municipal stormwater sewer system, using the NPDES Phase II MS4 permit structure. The SWMP also contains a Stormwater Pollution Prevention Plan for all DPW facilities.

The Town undertook several education and participation efforts, including:

- Publication notices and press releases about the illicit discharge bylaw and regulations, January 2009
- Drain marking through an Eagle Scout project, November 2008
- Neighborhoods-wide notifications regarding illicit discharges as they occur, including SuAsCo materials in the streets
- Construction of a rain garden at the Framingham High School, June 2008
- Drain marking by the Framingham High School Environmental Club, May 2008
- Rain Barrel promotion and sales, May 2008

The Town prepared detailed requirements for new development and redevelopment design and construction that will be subject to Board review. The requirements are planned to be presented at the Annual Town Meeting in April 2009.

The Town performed IDDE monitoring and sampling of the upper reach of the Sudbury River (Winter Street to Waushakum Pond, and Farm Pond in August 2008. No significant problems were identified.

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 – Permit Year 7 and beyond
NA	Create uses for SuAsCo postcards	SuAsCo/ Framingham DPW	NA (none created for the 6 th permit year)	SuAsCo Postcards were included in notifications that were mailed to neighborhoods where illicit discharges were observed by Town staff.	Continue public education as part of IDDE management program. Remainder to be determined for the next 5-year permit based on EPA requirements to be published.

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 – Permit Year 7 and beyond
NA	Continue Drain Marking Program	SuAsCo/ Framingham, DPW	NA (none created for the 6 th permit year)	The Town organized a 2 nd drain marking program with the local high school in May 2008. A Boy Scout Eagle Scout drain marking project was completed in November 2008 using the drain marking kit obtained through a National Park Service Wild and Scenic Grant. The Town sponsored a 3 rd successful Rain Barrel distribution program in May 2008. Over 130 barrels were purchased by residents.	To be determined for the next 5-year permit based on EPA requirements to be published.

3. Illicit Discharge Detection and Elimination

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 – Permit Year 7 and beyond
NA	Continue implementation of IDDE bylaw and program.	DPW, with participation by Con Comm, Board of Health, Dept of Inspectional Services	<p><i>Implement IDDE bylaw and accompanying regulations</i></p> <p><i>Implement IDDE outfall monitoring program.</i></p>	<p>An IDDE by-law was formally approved at the Spring 2008 Town Meeting (Article V, Section 26 of the Town bylaws)</p> <p>In addition, IDDE regulations were formally approved by the participating boards and commissions:</p> <ul style="list-style-type: none"> - Board of Health: 8/13/08 - Conservation Commission: 11/5/08 - Board of Selectmen: 1/27/09 <p>Monitoring and sampling was performed in the following water bodies. No significant problems were detected. A report is attached.</p> <ul style="list-style-type: none"> - Sudbury River 8/1/08 - Waushakum Pond 8/14/08 - Farm Pond 8/14/08 	<p>Monitoring and sampling to be performed at major outfalls in the Lokerville, Jacobs Brook, Cochituate, Angelica Brook, and Sucker Pond Sub-Basins. Samples will be taken, based on visual inspection, for:</p> <ul style="list-style-type: none"> - temperature - pH - phosphorus - nitrogen (as ammonia) - detergents - chlorine <p>Samples will be collected and analyzed for coliform and e. coli.</p> <p>Other activities to be determined for the next 5-year permit based on EPA requirements to be published.</p>

4. Construction Site Stormwater Runoff Control

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 6	Planned Activities – Permit Year 7 and beyond
NA	Construction site runoff controls	Framingham DPW/Comm	Review, implement, inspect and enforce construction site runoff controls.	Plans that come before the Planning Board are now reviewed using the Massachusetts DEP Stormwater Management Standards. These plans include all construction that falls under the requirements for the NPDES Phase II permit, whether it is near a wetland (as regulated by Massachusetts DEP) or not.	Amend Zoning Bylaw to require a detailed stormwater impact analysis that follows the DEP Stormwater Management Standards. The impact analysis will require applicants to meet each of the 10 standards as well as providing an LID analysis and detailed construction sediment and erosion control plan. Other activities to be determined for the next 5-year permit based on EPA requirements to be published.

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	Planned Activities – Permit Year 7 and beyond
NA	Implement Drainage Master Plan.	Framingham DPW/Comm	Continue implementation.	(Reliance on non-municipal partners indicated, if any) The Beaver Dam Brook/Farm Pond study is complete, with a report on analysis of alternatives for drainage improvements. In addition, the Town prepared a Draft Town-wide Stormwater Management Plan (SWMP) for activities performed by the Town to protect the drainage system.	To be determined for the next 5-year permit based on EPA requirements to be published.

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 – Permit Year 7 and beyond
NA	Evaluate CB Cleaning	Framingham DPW	Implement the Plan.	The street sweeping and catch basin cleaning plan continues to be in force. Collections are made and problem CBs are designated for either inspection or more frequent cleaning.	To be determined for the next 5-year permit based on EPA requirements to be published.

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 6 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 7 and beyond
				DEP has not released the TMDL report and targets for the Sudbury River.	Once the TMDL report is released by DEP, develop plans to obtain the goals.

7b. WLA Assessment

Not applicable

Part IV. Summary of Information Collected and Analyzed

As part of the SWMP described in Part II of this report, a draft SWPPP for the DPW facilities was prepared. Drainage systems, outfalls, and receive waters were identified and a plan was developed for monitoring and maintenance of these drainage systems.

Results of IDDE monitoring and sampling at Farm Pond, Waushakum Pond, and the upper reach of the Sudbury River are provided in the attached report. Sampling was performed only under dry conditions in this first year. Sampling will be performed under both wet and dry conditions starting in the summary of 2009.

A log of IDDE problems and resolutions is attached. The log was begun before the IDDE program was formally implemented; problems listed in the log were therefore not subject to the formal procedures.