MAY 4 2009

April 30, 2009

Ms. Glenda Velez US EPA – CIP One Congress Street, Suite 1100 Boston, MA 02114

Re: NPDES Stormwater General Permit 2008-2009 Annual Report Town of Franklin, MA

Dear Ms. Velez:

Enclosed for your records is the NPDES Stormwater General Permit 2008-2009 Annual Report for the Town of Franklin, MA. The Annual Report has simultaneously been filed with the Massachusetts DEP.

If you have any questions or require any additional information, please do not hesitate to call me at 508-520-4910 or our Consultant, Rich Niles with Comprehensive Environmental Inc. at (800)725-2550 ext. 307.

Sincerely,

Town of Franklin, Massachusetts

Robert Cantoreggi Director of Public Works

cc: Massachusetts Department of Environmental Protection, Boston Office Rich Niles, Comprehensive Environmental Inc.

Enclosure – NPDES Phase II Small MS4 General Permit 2008-2009 Annual Report

Municipality/Organization: Town of Franklin

EPA NPDES Permit Number: MAR041117

MaDEP Transmittal Number: W-041238

Annual Report Number & Reporting Period: No. 6: May 1, 2008-April 30, 2009

NPDES PII Small MS4 General Permit Annual Report

Part I. General Information

Contact Person	: Robert Cantoreggi	Title: DPW Director
-	· · · · · · · · · · · · · · · · · · ·	
Telephone #:	(508) 520-4910	Email: rcantoreggi@franklin.ma.us

Certification:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

	A. A.K.
Signature:	
Printed Name:	Jeffrey D. Nutting
Title:	/ / Town Administrator
<u> </u>	
Date:	1/30/09
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Part II. Self-Assessment

The Town of Franklin has completed the required self-assessment and has determined that our municipality is in permit conditions, except for the following provision:

- 1. Schedules have been modified for Illicit Discharge Detection and Elimination and Pollution Prevention a Housekeeping BMPs. Additionally, the BMPs to address the TMDLs completed for the Charles River a evaluation once the draft Phase II Permit is reissued. Schedule modifications are shown in Section III.
- 2. As discussed in the Year 5 Annual Report, a Stormwater Utility Feasibility Study was completed and the developing additional information in support of the utility. Further work on the utility was temporarily p current budget concerns; however, the Town will continue with the utility project during the next permit

Part III. Summary of Minimum Control Measures

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 6	Planne Next P
1A	Recycling Education for Home Owners	DPW/Solid Waste Coord.	Distribute 3 times/year	A mailer is sent to residents on a quarterly basis. The mailer discusses	Continu year.
Revised		Environmental Affairs Coordinator		proper waste disposal & recycling practices. SuAsCo materials were incorporated with quarterly mailers and the Summer 2008 edition included an article about the storm drain marking project (see BMP 2A).	
1B	Education Information on the Web Site	DPW/Solid Waste Coord.	Web Site Information developed and posted for year 2	The stormwater management/education web page was maintained and updated to be more user-friendly and links to	Continu new top Stormw
Revised		Environmental Affairs Coordinator	Web page developed in year 4 Increased # hits each year	SuAsCo web pages were added. Also, a hit counter was created in March 2009 and 47 hits were recorded by April 30, 2009.	needed the stor
				The DPW web page continued to advertise rain barrels to residents, discussing the improved environmental and stormwater benefits. Detailed recycling and waste disposal information is posted on the Town's recycling web page.	

1. Public Education and Outreach

Town of Franklin NPDES PII Small MS4 General Permit Annual Report MADEP Transmittal Number: W-041238

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 6
1C	Education on Waste Disposal & Water Conservation	DPW/Solid Waste Coord.	Materials Available in all Public Buildings	 Water conservation materials ar displayed at the Administration Building.
Revised		Environmental Affairs Coordinator		 Stormwater education materials were displayed at the Town Hall, High School, DPW Administrative
				Office and Senior Center * Recycling mailers sent quarterly to residents
				 Water conservation information is broadcast daily on local cable channel during months of May
				 Rain barrel facts are broadcast daily on local cable channel during months of March through May
				 Recycling facts are broadcast daily on local cable channel year round
				 Educational information available on specific websites for stormwater
				*
				kit and compost bins were made available to residents at the Earth Day cleanup event on April 18,
				* Phone and e-mail address provided

BMP	BMP Description	Responsible	Measurable Goal(s)	Progress on Goal(s) –	Planned Activities –
ID #		Dept./Person		Permit Year 6	Next Permit Term
		Name			
1D	Water Resource	DPW/Solid Waste	Five Signs	Five water resource information and	Evaluate additional locations for
	Information and	Coord.	Posted/Year beginning	protection signs were placed at selected	signs and coordinate with efforts
	Protection Signs		in year 3	priority areas in May 2008.	under BMP 1F.
Revised		Environmental	Begin posting signs in		
		Affairs	year 4; post/maintain		
		Coordinator	signs annually		
1E	Public Education with	DPW Director &	Number of	DPW attended committee meetings for	Continue to coordinate public
	Charles River	Solid Waste	Coordinated Programs	the Charles River TMDL pilot project	education efforts and pursue grant
	Watershed Association	Coord.		in October and September 2008 and	opportunities with the CRWA, as
Revised		Environmental	# attendees &	March 2009 to provide input and obtain	appropriate.
		Affairs	audience	a better understanding of requirements	
		Coordinator		for towns in the Charles River	
				Watershed.	

1a. Additions

) ***					
1F	Establish a "Green	Franklin High	Monthly meetings,	The DPW continued to work with the	Continue to hold monthly meetings
	Team" at Franklin High	School students,	agenda, memos of	Green Team and monthly meetings	and coordinate with DPW to
	School and Participate	DPW	actions and results	were held to discuss activities. The	incorporate stormwater tasks such as
	in Stormwater/Water			Green Team assisted DPW with the	storm drain stenciling.
	Quality Improvement			integration of additional recycling	
	Projects			within the school.	
1G	Open Data Sharing for	DPW	Ongoing	DPW provided ongoing support to the	Continue to share GIS and
	Stormwater		correspondence with	U.S. EPA with respect to GIS data and	infrastructure data with regulatory
	Infrastructure		regulatory agencies	information related to the storm drain	agencies.
			for data sharing	system.	
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2. Pul	Public Involvement and Participation	Participation			
BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 6	Planned Activities – Next Permit Term
2A	Storm Drain Stenciling	DPW	Average Ten Catch Basins/Year	50 storm drains were marked by the DPW in the highest priority	Continue to stencil storm drains in the highest priority watersheds in
Revised		Environmental Affairs Coordinator		watersheds.	Town. Solicit and involve local Youth Organizations (e.g., Green Team, Eagle Scouts).
2B	Outreach Efforts with Charles River Watershed Association	DPW Director, Solid Waste Coordinator &	Number of Coordinated Programs	The Town of Franklin is working with CRWA on their Building Blue sub watershed restoration project. The goal	Coordinate public events during next permit term to increase public education and involvement.
		Conservation		of the project is to develop a conceptual plan for water quality	-
Revised		Environmental Affairs Coordinator		improvements that can be applied to a specific downtown sub watershed.	
2C	Public Meetings to Encourage Volunteers	DPW Director, Solid Waste Coordinator & Conservation	Meetings held with the Public Starting Year 2	An Earth Day cleanup event was held on April 18, 2009 at Beaver Pond and approximately 350 people participated. The event focused on minimizing	Continue to solicit volunteers and advertise the Earth Day cleanup.
Revised		Environmental Affairs Coordinator	One meeting annually	environmental impact, water conservation and stormwater.	
2a. A	Additions				
2D	Community Assistance Program	DPW	Evaluation correspondence	Educational materials from SuAsCo, tailored to the Charles River, were incorporated into existing programs. The informative display was set up at various locations during the permit term: Town Hall, High School, DPW Administrative Office and Senior Center. The display was also available at the Earth Day Cleanup event on April 18, 2009.	Continue to develop program needs and incorporate materials into public education/outreach and participation/involvement BMPs, as appropriate.
2E	Establish a Stormwater Telephone Hotline	To be determined.	Record number of phone calls to hotline, copies of advertisements.	Stormwater issues are handled by DPW through calls to the stormwater hotline displayed on the stormwater website. Approximately 10 cases with written complaints were addressed.	Record number of phone calls to hotline. Continue to establish means in which residents may acquire additional stormwater information.

	3E De				Revised	Ou	3D Per	Revised		Det	3C Der				1001	Revised	Orc	3B Dev									Nevised	Deviced	Dev	3A Stor		ID #	BMP BM	3. Illicit D
	Develop Procedures for Removing Illicit Connections		-			Outrall Assessments	Perform Dry Weather		Implementation Plan	Detection	Develop Illicit						Water Discharge Ordinance	Develop Non-Storm											Development	Storm Water Map			BMP Description	Illicit Discharge Detection and Elimination
	DPW Director, Consultant			G	GIS Manager	consultant	DPW Director,				DPW Director							DPW Director									OIN Manager	Highway Dept	I own Engineer,	DPW Director,	Name	Dept./Person	Responsible	n and Eliminat
	Procedures Developed and Number of Locations Identified					Assessed	Prioritized Areas and				Plan Developed				Meeting in year 5	Draft hvlaw at Town	Iown	Ordinance Adopted by											Showing Collection	Completed Map			Measurable Goal(s)	ion
maching in antlined in the IDDE	Procedures for the removal of illicit discharges were added to the IDDE plan (BMP 3C) and the legal	quality sampling).	prioritize follow-up actions (e.g., water	began evaluating dry weather flows to	screened for illicit discharges and DPW	obvious mich discharges were observed. All 442 outfalls have been	178 outfalls were inspected and no	Plan (IDDE).	Discharge, Detection Implementation	accordance with the Town's Illicit	Outfall inspections were completed in	upcoming Town Council meeting.	bylaw awaits presentation at an	The draft illicit discharge prohibition		r rovisions for fines and enforcement.	regulation on August 1, 2008 for prohibition of improper drains with	The Town adopted a floor drain	updated with age of pipe information.	Water and sewer maps were also	assessments and asset management.	scale) maps for future drainage	is working to develop detailed (40-	approximately 60% mapped and DPW	plans. The drainage network is	network from existing subdivision	inspections (see Divit 5D) and ongoing	inspections (see RMP 2D) and ongoing	and the storm drain system map was	442 outfalls were previously mapped		Permit Year 6	Progress on Goal(s) -	
	Document the progress of removing any identified illicit discharges.	•	appropriate.	with dry weather flow, as	water quality assessments at outfalls	sewer maps. Conduct additional	Evaluate dry weather flows with		BMP 3D below).	accordance with the IDDE plan (see	Continue with follow-up actions in					(Council meeting for final review.	Present illicit discharge bylaw to the							based on this information.	begin to define drainage catchments	detailed drainage data layer and	Continue to develon detailed a	map and UIS data with ongoing	Continue to update the drainage		Next Permit Term	Planned Activities –	

4. Con	4. Construction Site Stormwater Runoff Control	water Runoff Co	ontrol		
BMP ID #	BMP Description	Responsible Dept./Person	Measurable Goal(s)	Progress on Goal(s) – Permit Year 6	Planned Activities – Next Permit Term
		Name			
4A	Ordinance	DPW Director,	Ordinance Adopted by	A stormwater bylaw was adopted into	Continue to implement the
	Development for Waste	Town Engineer,	Town	the Town's regulations in 2007.	stormwater bylaw in permit review
	Control	Conservation,			and enforcement processes.
		Planning,			
		Consultant			
Revised			Draft bylaw at Town		
			Meeting in year 4		
4B	Formalization of Site	DPW Director, Town Engineer	Site Plan Review Procedures Adopted	This BMP has been incorporated into the work discussed under BMP 4A. as	Refer to BMP 4A.
	Procedures	Conservation,	by Town	part of the stormwater bylaw.	
		Planning, Consultant			
Revised					
4C	Revised Ordinance to	DPW Director,	Revised Ordinance	This BMP has been incorporated into	Refer to BMP 4A.
	Address Storm Water Pollution	Town Engineer, Conservation,	Adopted by the Town	part of the stormwater bylaw.	
		Planning, Consultant			
Revised					
i					

3a. Additions.

3F	Setup and Advertise a	Environmental	Log of Complaints and	Coordinated with BMP 2E, DPW	Keep log of complaints and action
	Hotline for Illicit	Affairs	Action Taken.	handle stormwater issues through	taken. Continue to establish means
	Discharges	Coordinator		written records and calls to the hotline.	in which residents may acquire
	(additional stormwater information.
3G	I/I and Sewer Rehab.	DPW Director,	Prioritization plan and	I/I and sewer rehabilitation activities	Continue I/I and sewer rehabilitation
	Program	Consultant	record of corrections	are ongoing and include: cleaning and	activities to repair infrastructure.
				lining of aged or damaged pipes,	
				rebuilding manholes, disconnecting	
		-		inflow sources, etc.	

BMP ID #	BMP Description	Responsible Dept./Person	Measurable Goal(s)	Progress on Goal(s) – Permit Year 6
		Name		
4D	Best Management	DPW Director,	Handbook Completed	The stormwater bylaw references the
	Practice Manual for	Town Engineer,	and Adopted by Town	MA DEP Handbook for e
	Developers	Conservation,		control requirements that
		Planning,		review future projects.
		Consultant	ι 	
Revised		Environmental	MA DEP Handbook	
		Affairs	on File	
		Coordinator		
4E	Formalization of	DPW Director,	Inspection Procedures	A standardized checklist was prepared
-	Inspection Procedures	Town Engineer,	Adopted by Town	as part of the bylaw work discussed
		Conservation,		under BMP 4A. This checklist was
		Planning,		used by DPW for construction site
		Consultant		inspections at 12 projects
Revised		Construction		the permit term.
		Inspectors		

4a. Additions.

			4F
by the Public	Information Submitted	for the Receipt of	Establish a Procedure
	Conservation	Town Engineer,	DPW Director,
advertising the hotline.	copies of articles	phone calls to hotline,	Record number of
is coordinated with BMP 2E.	problems that arise. This information	related to stormwater and handles any	The DPW generally receives calls
construction sites.	information by the public regarding	continue to receive and record	Coordinate with BMPs 2E & 3F,

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

	Revised		Dev	5C Best Han		Revised		Impacts	Post	5B Revi		Revised				Tern	5A Proc	:		BMP BM
			Developers	Best Management Handbook for				acts	Post Construction	Review Procedures for						Term O&M	Procedures for Long			BMP Description
Attairs Coordinator	Environmental	Planning, Consultant	Conservation,	Town Engineer,	77777		Planning, Consultant	Conservation,	Town Engineer,	DPW Director,	-	-	Consultant	Planning,	Conservation,	Town Engineer,	DPW Director,	Name	Dept./Person	Responsible
on File	MA DEP Handbook			and Adopted by Town	IT- 31- 51- Commission			-	Procedures by Town	Adoption of	Meeting in year 4	Draft bylaw at Town				Procedures by Town	Adoption of			Measurable Goal(s)
		review projects.	Management Practices that is used to	MA DEP Handbook for Best	The atomicitar helper references the			part of the stormwater bylaw.	the work discussed under BMP 5A, as	This BMP has been incorporated into						the Town's regulations in 2007.	A stormwater bylaw was adopted into		Permit Year 6	Progress on Goal(s) –
			stormwater bylaw.	review of BMP designs under the	Continue to use the handhook for					Refer to BMP 5A.				requirements and permit review.	operation and maintenance	stormwater bylaw and incorporate	Continue to implement the		Next Permit Term	Planned Activities –

5a. Additions

, see .					
5D	Establish a Procedure	DPW and	Record number of	The DPW generally receives calls	Coordinate record keeping program
	for the Receipt of	Conservation	phone calls, and	related to stormwater and handles any	with the post-construction
	Information Submitted	Planning	copies of letters and	problems that arise.	stormwater bylaw, track calls and
	by the Public		other		records of enforcement.
			correspondence.		
-					

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Revised	6E	Revised	6D	Revised	6C		Revised	}	Revised	1	BMP ID #
	Catch Basin Cleaning		Spill Response and Prevention)	Parking Lot and Road Sweeping			Employee Training		Standard Operating Procedures	BMP Description
	DPW Director/Division Heads		DPW Director/Division Heads		DPW Director/Division Heads			DPW Director/Division Heads	Environmental Affairs Coord.	DPW Director/Division Heads	Responsible Dept./Person Name
	Schedule Developed and Areas Prioritized for Cleaning		Procedures and Inventory Completed		Schedule Developed and Areas Prioritized for Cleaning		Annual training, attendance sheet and copy of program	Four Employee Training Sessions	List of current O&M procedures	Ten Procedures Developed	IP BMP Description Responsible Measurable Goal(s) Progress on # Dept./Person Permit Yea
	The Highway Department used the old Water Department vacuum truck to assist with catch basin cleaning.	at the facility and formal training for the DPW employees was conducted on July 24 & 29, 2008.	The Spill Prevention Control and Countermeasure (SPCC) Plan was updated in July 2008 based on changes	twice a year. The previous purchase of a new street sweeper helped to maintain the cleaning schedules.	Continued routine street sweeping program. All streets are swept once a year and the downtown area is swept	Oil spill response training was conducted in July 2008 for DPW employees (see BMP 6D). An erosion and sediment control training session is scheduled for DPW employees to attend in May 2009.	management practices with consideration for runoff and water quality protection.	The DPW Director gave a presentation to the Town Council in January 2008 on the Town's snow and ice	and the Town continued to evaluate specific standard operating procedures (SOPs).	This BMP has been incorporated into the work discussed under BMP 6H. The work under BMP 6H was updated	Progress on Goal(s) – Permit Year 6
	Begin to evaluate appropriate cleaning frequencies and coordinate maintenance activities with BMP 6H.		Follow the current SPCC Plan and continue with DPW employee training.	of equipment and staff time. Consider a tracking method for sediment volumes.	Continue existing practices for sweeping and enhance cleaning operations based on the availability		future training needs.	Conduct training for the DPW, Highway, Water and Sewer Department employees and evaluate	housekeeping. Develop SOPs as appropriate.	Incorporate the results of BMP 6H and implement the recommendations for pollution prevention and	Planned Activities – Next Permit Term

6a. A	Additions				
BMIP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 6	Planned Activities – Next Permit Term
6F	Municipal Facilities and Operations Evaluation	DPW & Consultant	Record of inspections, recommendations and improvements. Pollution prevention inspection checklist.	The municipal facilities and operations evaluation was updated following the construction of the new DPW facility. Recommendations for municipal facilities and operations were developed.	Begin to implement the recommendations of the updated evaluation.
6G	Low Impact Design for DPW Roadway & Drainage Projects	DPW Director, Town Engineer	Record of final or as- built plans and improvements.	One project to remove impervious surface was completed on Crossfield Road with the elimination of one sidewalk. Additionally, existing drainage structures were replaced with deep sump catch basins. Work began on three stornwater retrofit projects (see BMP 6H).	Additional projects and drainage improvements will be evaluated during the next permit round.
6H	BMP Evaluation and Identification of Needed Retrofits	DPW Director, Town Engineer, Consultant	Database of BMPs, owners, O&M requirements, inspection forms.	The Town focused on the retrofit designs at 3 BMP locations using funding obtained through a MA DEP Section 319 grant. At the site along Panther Way, the design was finalized	Finalize the design and construct the remaining 2 BMP retrofits under the s319 grant. Incorporate the results of the previous BMP evaluation into future evaluations for impaired
	<u>.</u>			and the project was publicly bid. Construction is anticipated during the spring/summer 2009. This project will result in the treatment of the first 0.6 inches of rainfall (i.e., first flush) over 28 acres of an existing condominium where stormwater previously discharged directly to a stream.	waters (BMP 7A & 7B) and evaluate priority cleaning areas and retrofit opportunities. Incorporate maintenance needs into existing operations as funding allows.
61	61 Stormwater BMP DPW Record of cleanin Maintenance & activities, # struct Drainage System Upgrades	DPW	Record of cleaning activities, # structures cleaned annually	A sediment forebay was constructed at the outfall from Southgate Road. Deep sump catch basins and sediment forebays were incorporated into an emergency culvert reconstruction project on Lincoln Street. A drain pipe was replaced, deep sump catch basins were added and the outfall for the drainage system was outfitted with a plunge pool and additional riprap on Colt Road.	Drainage improvements will be evaluated for Anchorage Road and Wachusett Street. Continue to make drainage improvements as funding is available. Incorporate the results of BMP 6H.
TOWN			"		7. + 0 1.1

7b. \	7B	7A	7a. /	Revised	BMP ID #	7. BN	6]
WLA Assessment	Implement Water Quality Improvement Plan for discharges to 303(d) waters.	Evaluate Data and TMDL for the Charles River and Develop a Plan to Improve TMDL Waters	Additions		BMP Description	7. BMPs for Meeting Total Maximum Daily Load (TMDL) Waste Load Allocations	Make Annual Household Hazardous Waste Collections Available to Residents
	DPW, Conservation, Environmental Affairs Coordinator	DPW, Conservation, Environmental Affairs Coordinator, Consultant			Responsible Dept./Person Name	Maximum Dai	DPW & Board of Health
	Photographs, logs, and BMP descriptions for completed efforts and water quality improvements	Copy of Water Quality Improvement Plan			Measurable Goal(s)	ly Load (TMDL) Wa	Ongoing resident participation, amount of materials collected
·	Refer to BMP 7A.	As discussed in the Year 5 Annual Report, the Town hired CEI to perform a review of the Charles River TMDLs and to develop a strategy to meet the TMDL considering existing actions under the Phase II stormwater management program and available resources. CEI updated this review and provided preliminary recommendations for a water quality strategy, pending the reissuance of the Phase II Permit.			Progress on Goal(s) – Permit Year 6 (Reliance on non-municipal partners indicated, if any)		A collection event was held at the Town Hall on October 4, 2008. The Town has a reciprocal agreement with 8 neighboring communities that allows residents to participate in Household Hazardous Waste Collections on multiple dates.
	This will begin upon development of the implementation strategy and as resources become available.	Review the pending Phase II Permit and develop an implementation strategy to meet the TMDL that considers the goals of the TMDL, available resources, actions currently being undertaken by Franklin and actions by others under the MA DEP RIA Permit and/or the U.S. EPA CWA Permit.			Planned Activities – Next Permit Term	WLA) << if applicable>>	Continue to hold an annual event and renew the reciprocal agreement with neighboring communities for additional event opportunities. Evaluate methods to track participation and the amount of materials collected.

0156.0, January 2007. The Town of Franklin hired Comprehensive Environmental Inc. (CEI) to review the TMDLs and provide Two TMDLs have been finalized for the Charles River Basin. These include the Total Maximum Daily Load for Nutrients in the Lower Charles River Basin, Massachusetts CN 301.0, June 2007 and the Pathogen TMDL for the Charles River Watershed, CN

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Town of Franklin NPDES PII Small MS4 General Permit Annual Report MADEP Transmittal Number: W-041238	School curricula implemented (y/n)	material collected (tons or gal)	community participation (%)	days sponsored (#)	Household Hazardous Waste Collection Days	Shoreline clean-up participation or quantity of shoreline miles cleaned (y/n or mi.)	Stream teams established or supported (# or y/n) N	(y/n)	Estimated number of residents reached by education program(s) (# or %) 100%	Education, Involvement, and Training	*Environmental Affairs Coordinator	Annual program budget/expenditures (\$)	Stormwater management position created/staffed (y/n) Yes*	Programmatic	Part V. Program Outputs & Accomplishments (OPTIONAL)	 Number of outfalls screened for illicit discharges: 178 during the permit term, 442 total 350 residents participated in Earth Day event Several drainage system improvement projects to incorporate deep sump catch basins and design BMP retrofits. 	Part IV. Summary of Information Collected and Analyzed	recommendations on the additional steps needed to comply with the TMDLs. CEI has reviewed the TMDLs and has identified some concerns that will be considered in the development of the implementation strategy. Additionally, the developments of the MA DEP Regulated Impervious Area (RLA) General Stormwater Permit and the U.S. EPA Residual Designation Authority or Clean Water Act (CWA) Permit were evaluated with respect to the Town's existing program. CEI provided preliminary recommendations for the appropriate next steps by the Town that could be implemented consistent with the TMDL strategy; however, this information will be evaluated further to develop an appropriate strategy based on the pending draft Phase II Permit.
13 of 16			,						0		Coordinator							l some A DEP uter Act the will be

Legal/Regulatory Regulatory Mechanism Status (indicate with "X") Illicit Discharge Detection & Elimination Erosion & Sediment Control Poet-Development Stormwater Management	In Place Prior to Phase II	Under Review	Drafted	Adopted X
Regulatory Mechanism Status (indicate with "X")			4	-
 Illicit Discharge Detection & Elimination 			X	
 Erosion & Sediment Control 				
 Post-Development Stormwater Management 				
Accompanying Regulation Status (indicate with "X")				
 Illicit Discharge Detection & Elimination 			X	
 Erosion & Sediment Control 				
 Post-Development Stormwater Management 				
Mapping and Illicit Discharges				- 14 -
Outfall mapping complete			(%)	
Estimated or actual number of outfalls		(#	(#)	442
System-Wide mapping complete		()	(%)	50%
Mapping method(s)				
 Paper/Mylar 				75%
		<u> </u>	(0/)	

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(%)
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Salt is stored in two sheds to provide adequate cover of all materials.	struction	Salt nile(s) covered in storage shed(s) (y/n)	Automatic or Zero-velocity spreaders used (y/n) Estimated net reduction in twical year salt annlication (lbs. or %)	Pre-wetting techniques utilized (y/n)	% Sand	% KC1	% Kac	% CMA	% MgCl ₂		Anti-/De-Icing products and ratios % NaCl		Pesticides (lbs. or %)	Herbicides (lbs. or %)		Reduction in application on public land of: ("N/A" = never used; "100%" = elimination)		Vacuum streat surgeners specified in contracts (V/n)	Vacuum street sweepers purchased/leased
	(y/n)	(103: 01 /) (y/n)	(lbs. or %)	(y/n)	% Sand	% KC1	% Kac	% CMA	% MgCl ₂	% CaCl ₂	% NaCl		(lbs. or %)	(lbs. or %)	(lbs. or %)		//	(u/n)	