

8/24/10



TOWN OF DOUGLAS

Michael D. Hughes, *Chairman*
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OFFICE OF THE SELECTMEN

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Michael J. Guzinski
Town Administrator

Suzanne L. Kane
Administrative Assistant

August 17, 2010

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

**RE: EPA NPDES Permit #MAR041106
Stormwater General Permit Notice of Intent for Discharges from Small
Municipal Separate Storm Sewers (MS4s)**

Dear Reviewer:

Enclosed, please find the seventh annual report for the above referenced permit. The Town of Douglas is pleased to work with the Department of Environmental Protection and the Environmental Protection Agency in preserving our natural resources. If there are any issues or questions pertaining to this permit application submittal, do not hesitate to contact our Town Engineer – William Cundiff, at 508-476-4000 ext. 108 to discuss. Thank you for your time and we look forward to working with you on this important project.

Respectfully,

Michael J. Guzinski
Town Administrator

cc: William Cundiff
Department of Environmental Protection

Municipality/Organization: Town of Douglas, MA
EPA NPDES Permit Number: MAR041106
MassDEP Transmittal Number: W-040641
Annual Report Number Year 7
& Reporting Period: April 1, 2009 – March 31, 2010

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NPDES PII Small MS4 General Permit Annual Report (Due: May 1, 2010)

Part I. General Information

Contact Person: William J. Cundiff, P.E. **Title:** Town Engineer
Telephone #: 508-476-4000 x108 **Email:** WCundiff@DouglasMA.org
Mailing Address: 29 Depot Street, Douglas, MA 01516

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: Michael J. Guzinski
Title: Town Administrator
Date: August 17, 2010

Part II. Self-Assessment

The Town of Douglas has completed the required self-assessment and has determined that our municipality is in compliance with all the permit conditions. However, a more active plan for Illicit Discharge Detection and Elimination (IDDE) seems to be warranted based upon observed fining patterns from the EPA, accordingly the Town of Douglas is reviewing our practices for IDDE compliance. Furthermore, a proposed stormwater bylaw was put forth at the last annual town meeting and was overwhelmingly defeated. The local boards will be revisiting this over the next year to make any necessary revisions to provide a compliant draft that will pass Town Meeting. A meeting is scheduled between the Conservation Commission and Fred Civian of the MA DEP for Sept. 20, 2010 to provide an educational overview of the Stormwater Bylaw Requirements.

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 4 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 5
2.1	Lawn & Garden Activities	Community Development / Wm. Cundiff	Cable Advertisements & Internet	Cable Advertisements have been running.	Developing the internet information and continuing with the Cable Advertisements.
2.2	Household Hazardous Waste	Community Development / Wm. Cundiff	Cable Advertisements & Internet	Cable Advertisements have been running.	Developing the internet information and continuing with the Cable Advertisements.
2.3	Pet Waste Management	Community Development / Wm. Cundiff	Cable Advertisements & Internet	Cable Advertisements have been running.	Developing the internet information and continuing with the Cable Advertisements.
2.4	Trash Management	Conservation Commission / Wm. Cundiff	Cable Advertisements & Internet	Cable Advertisements have been running.	Developing the internet information and continuing with the Cable Advertisements.
2.5	Classroom Education	School Dept. / Nancy Lane	Number of Classes	Nothing completed this past year.	Planning and evaluating how to incorporate classroom education.
2.6	Stormwater Education Materials	Community Development / Wm. Cundiff	Cable Advertisements & Internet	Cable Advertisements have been running.	Developing the internet information and continuing with the Cable Advertisements.

1a. Additions

2. Public Involvement and Participation

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 4 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 5
3.1	Storm Drain Stenciling	Highway Dept. / John Furno	No. of Storm Drains Stenciled	All catch basins in the vicinity of the downtown area have been stenciled (~20/as needed).	Maintain stenciling during catch basin cleaning, as needed.
3.2	Stream Cleanup & Monitoring	Conservation Commission / Wm. Cundiff	No. of Cleanup Events	The Conservation Commission held no stream clean-ups this year.	Maintaining a Stream Cleanup and monitoring program.
3.3	Adopt-A-Stream program	Conservation Commission / Wm. Cundiff	No. of Streams Adopted	No Streams have been adopted to date.	Implementation of an Adopt-A-Stream program.
3.4	Community Hotlines	Highway Dept. / John Furno	No. of Calls Received	No Calls Received this year.	Continue advertisements on cable and internet to let people know what department to call.

2a. Additions

3. Illicit Discharge Detection and Elimination

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 4 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 5
4.1	Failing Septic System	Board of Health / Marlene Bacon	No. of Systems repaired	Five (5) systems have been identified to have failed since last report.	Continue identifying failed systems and monitoring the progress of the repairs.
4.2	Improper Wastewater Connection / Discharge	Community Development / Wm. Cundiff	Surveys Completed	Form is currently being developed for posting on the Town Website.	Complete form development and post form on website.
4.3	Sanitary Sewer Overflows	Sewer Dept. / Robert Sullivan	No. of Overflows / repairs	No overflows identified this past year.	Continue system inspection on an annual basis. I/I evaluation required under State wastewater Permit. TV inspection & Manhole Inspections

3a. Additions

4. Construction Site Stormwater Runoff Control

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 4 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 5
5.1	Runoff Control	Community Development / Wm. Cundiff	Implementation of Requirements	Planning Board is establishing requirements for Runoff control thru Town Bylaws. Currently design standards require basic stormwater management such as post-developed flow be less than or equal to predeveloped stormwater flow.	Finalize new bylaw and Review submittals that fall under the authority of the bylaws.
5.2	Erosion Control	Community Development / Wm. Cundiff	Implementation of Requirements	Planning Board is establishing requirements for erosion control thru Town Bylaws. Currently design standards require basic erosion control measures such as erection of haybales, geotextile matting on sideslopes, establishment of vegetation as quickly as possible or similar mechanisms.	Finalize new bylaw and Review submittals that fall under the authority of the bylaws.
5.3	Sediment Control	Community Development / Wm. Cundiff	Implementation of Requirements	Planning Board is establishing requirements for Sediment control thru Town Bylaws. Currently design standards require basic sediment controls such as sediment forebays, deep sump catch basins or similar mechanisms.	Finalize new bylaw and Review submittals that fall under the authority of the bylaws.
5.4	Good Housekeeping	Community Development / Wm. Cundiff	Implementation of Requirements	Planning Board is establishing requirements for maintenance thru submittal and approval of short term and long term operation and maintenance plans for proposed stormwater management structures prior to project approval.	Finalize new bylaw and Review submittals that fall under the authority of the bylaws.

4a. Additions

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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 4 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 5
6.1	Structural BMPs	Community Development / Wm. Cundiff	Implementation of Requirements	Planning Board is establishing requirements for structural Best Management practices thru Town Bylaws.	Finalize new bylaw and Review submittals that fall under the authority of the bylaws
6.2	Non-Structural BMPs	Community Development / Wm. Cundiff	Implementation of Requirements	Planning Board is establishing requirements for non-structural Best Management practices thru Town Bylaws.	Finalize new bylaw and Review submittals that fall under the authority of the bylaws

5a. Additions

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 4 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 5
6.1	Structural BMPs	Community Development / Wm. Cundiff	Implementation of Requirements	Planning Board is establishing requirements for structural Best Management practices thru Town Bylaws.	Finalize new bylaw and Review submittals that fall under the authority of the bylaws
6.2	Non-Structural BMPs	Community Development / Wm. Cundiff	Implementation of Requirements	Planning Board is establishing requirements for non-structural Best Management practices thru Town Bylaws.	Finalize new bylaw and Review submittals that fall under the authority of the bylaws

6a. Additions

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 4 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 5
8.1	Upgrade of WWTP	Sewer Dept. / Robert Sullivan	Completion of Construction	Construction of WWTP upgrade is presently completed.	None
8.2	Implementation of Requirements	Community Development / Wm. Cundiff	Implementation of Requirements	Draft of Stormwater Bylaw has been compiled.	Begin review process with Conservation Commission and the Board of Selectmen

7a. Additions

7b. WLA Assessment