



TOWN OF FRANKLIN

DEPARTMENT OF PUBLIC WORKS

Franklin Municipal Building
257 Fisher Street
Franklin, MA 02038-3026

6/1/10
P

May 20, 2010

Ms. Glenda Velez
US EPA – CIP
5 Post Office Square – OEP06-01
Boston, MA 02109

**Re: NPDES Stormwater General Permit
2009-2010 Annual Report
Town of Franklin, MA**

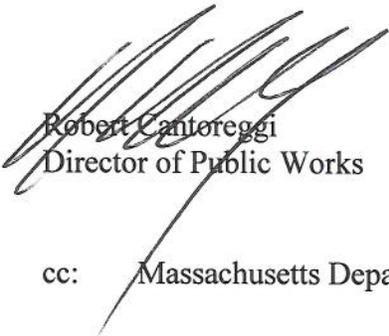
Dear Ms. Velez:

Enclosed for your records is the NPDES Stormwater General Permit 2009-2010 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.

Sincerely,

Town of Franklin, Massachusetts



Robert Cantoreggi
Director of Public Works

cc: Massachusetts Department of Environmental Protection, Boston Office

Enclosure – NPDES Phase II Small MS4 General Permit 2009-2010 Annual Report

Municipality/Organization: Town of Franklin

EPA NPDES Permit Number: MAR041117

MaDEP Transmittal Number: W- 041238

**Annual Report Number
& Reporting Period: No. 7: May 1, 2009-April 30, 2010**

NPDES PII Small MS4 General Permit Annual Report

Part I. General Information

Contact Person: Robert Cantoreggi

Title: DPW Director

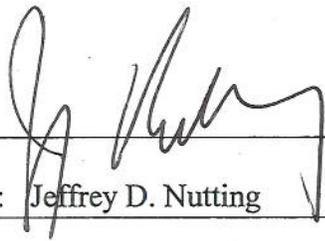
Telephone #: (508) 520-4910

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.

Signature:



Printed Name: Jeffrey D. Nutting

Title: Town Administrator

Date:

5/20/2010

Part II. Self-Assessment

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

1. Schedules have been modified for Illicit Discharge Detection and Elimination and Pollution Prevention and Good Housekeeping BMPs. Additionally, the BMPs to address the TMDLs completed for the Charles River are currently under review based on the draft North Coastal MS4 Permit that was issued on February 4, 2010. The Town also reviewed and submitted comments for the draft TMDL for Nutrients in the Upper/Middle Charles River and will evaluate the final report for consideration of appropriate BMPs. Schedule modifications are shown in Section III.
2. As discussed in previous Annual Reports, a Stormwater Utility Feasibility Study was completed in 2007 and the Town began developing additional information in support of the utility. This work was subsequently put on hold due to budget concerns in 2008; however, the Town began updating the utility project in 2009 and will continue during the next permit term. The Town is now exploring funding sources for a Regional Stormwater Feasibility Study in cooperation with the towns of Milford and Bellingham.

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 7	Planned Activities - Next Permit Term
1A Revised	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 proper waste disposal & recycling practices. The recycling section of the Town website was updated with additional information on recycling practices. Two door hanger campaigns were initiated to encourage recycling; the first targeted residences with no curbside recyclables, the second targeted residences with a small amount of curbside recyclables.	Continue to send mailer 3-4 times per year. Continue to update website with additional information and educational materials. Investigate a move to single-stream recycling.

1B	Education Information on the Web Site	DPW	Web Site Information developed and posted for year 2	<p>The stormwater management/education web page was maintained and updated to be more user-friendly and links to EPA, DEP and CRWA web sites were added. Copies of the newly created quarterly stormwater management flyer were added to the website and the quarterly mailer. The hit counter added to the web page in Year 6 recorded an additional 563 hits by 04/28/2010.</p> <p>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.</p>	Continue to update web page with new topics and the progress of the Stormwater Management program as needed. Track the number of hits on the stormwater web page to gauge effectiveness.
Revised			Increase # of web site hits each year		

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 7	Planned Activities – Next Permit Term
1C	Education on Waste Disposal & Water Conservation	DPW/Solid Waste Coord.	Materials Available in all Public Buildings	<ul style="list-style-type: none"> * Water conservation materials are displayed at the Administration Building. * Water Conservation Kits (toilet tank displacement bags, low-flow showerheads, leak detection tablets, faucet aerators) were made available at the DPW. * Stormwater education materials were displayed at the Town Hall, High School, DPW Administrative Office and Senior Center * Recycling flyers sent quarterly to residents * Water conservation information is broadcast daily on local cable channel during months of May through October * Mandatory water conservation notices were added to quarterly newsletter. * A mercury thermometer replacement program was implemented; residents can turn in their old mercury thermometer for a digital one. * Recycling facts are broadcast daily on local cable channel year round * Educational information available on specific websites for stormwater management and recycling * Rain barrels, a water conservation kit and compost bins were made available to residents at the Earth Day cleanup event on April 17, 2010 * Phone and e-mail address provided for citizen inquiries (dpw@franklin.ma.us) 	Continue to make materials available at public buildings, Town Events and post information on the Town's website.
Revised					

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 7	Planned Activities – Next Permit Term
1D Revised	Water Resource Information and Protection Signs	DPW	Five Signs Posted/Year beginning in year 3 Begin posting signs in year 4; post/maintain signs annually	The DPW installed an additional 5 “Water Resource Area” signs at crossings for the Shepards Brook, Uncas Brook, Miller Brook and Mine Brook.	Evaluate additional locations for signs and coordinate with efforts under BMP 1F.
1E Revised	Public Education with Charles River Watershed Association	DPW Director, Town Engineer	Number of Coordinated Programs # attendees & audience	DPW members met with CRWA 6 times to discuss and gather technical information for their “Building Blue” subwatershed project. The meetings included two full day site visits to sites within the subwatershed.	Continue to coordinate public education efforts and pursue grant opportunities with the CRWA, as appropriate.

1a. Additions

1F	Establish a “Green Team” at Franklin High School and Participate in Stormwater/Water Quality Improvement Projects	Franklin High School students, DPW	Monthly meetings, agenda, memos of actions and results	The DPW continued to work with the Green Team and monthly meetings were held to discuss activities. The Green team also participated in Earth Day activities.	Continue to hold monthly meetings and coordinate with DPW to incorporate stormwater tasks such as storm drain stenciling (BMP 2A).
1G	Open Data Sharing for Stormwater Infrastructure	DPW	Ongoing correspondence with regulatory agencies for data sharing	DPW provided ongoing support to the U.S. EPA with respect to GIS data and information related to the storm drain system in their study of report “Optimal Stormwater Management Plan Alternatives: A Demonstration Project in Three Upper Charles River Communities”. In August 2009 the results of the study were presented to the DPW.	Continue to share GIS and infrastructure data with regulatory agencies.

IH	Classroom Stormwater Education	Town Engineer & DPW	# students and/or # classes & grades taught	As part of the s319 Grant for Stormwater Retrofit Improvements (see also BMP 6D), the Town Engineer gave stormwater lectures to 36 middle school classes and 3 high school classes. Approximately 1,000 students were reached. The presentations were well received by the students.	Evaluate additional classroom education opportunities.
II	Stormwater Newspaper Articles	DPW	# articles published, audience reached	DPW published articles in the Milford Daily News related to the s319 Grant project along Panther Way and the importance of this type of improvement for water quality protection. The articles were published on July 30, 2009 and December 28, 2009. A separate article was published related to tree pit stormwater treatment device on September 5, 2009 (see BMP 6G). On April 25, 2010 an article was published regarding the stormwater lectures being conducted in schools for students.	Develop and publish articles for new topics on a regular basis.

2. Public Involvement and Participation

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 7	Planned Activities – Next Permit Term
2A Revised	Storm Drain Stenciling	DPW	Average Ten Catch Basins/Year	An additional 35 storm drains were marked in locations with high foot traffic.	Continue to stencil storm drains in the highest priority watersheds in Town. Solicit and involve local Youth Organizations (e.g., Green Team, Eagle Scouts).
2B Revised	Outreach Efforts with Charles River Watershed Association	DPW Director & Conservation	Number of Coordinated Programs	The Town of Franklin continued to work with CRWA on their Building Blue sub watershed restoration project. The goal of the project is to develop a conceptual plan for water quality improvements that can be applied to a specific downtown sub watershed.	Coordinate public events during next permit term to increase public education and involvement.
2C Revised	Public Meetings to Encourage Volunteers	DPW, Recreation Department, Earth Day Committee (volunteer)	Meetings held with the Public Starting Year 2 One meeting annually	An Earth Day cleanup event was held on April 17, 2010 at Beaver Pond and approximately 150 people participated. The event focused on minimizing environmental impact, water conservation and stormwater.	Continue to solicit volunteers and advertise the Earth Day cleanup.

2a. 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 17, 2010.	Continue to develop program needs and incorporate materials into public education/outreach and participation/involvement BMPs, as appropriate.
2E	Establish a Stormwater Telephone Hotline	DPW	Record number of phone calls to hotline, copies of advertisements.	Stormwater issues are handled by DPW through calls to the main office as displayed on the stormwater website. Approximately 8 cases were addressed.	Record number of phone calls to hotline. Continue to establish means in which residents may acquire additional stormwater information.

3. Illicit Discharge Detection and Elimination

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 7	Planned Activities – Next Permit Term
3A Revised	Stormwater Map Development	DPW Director, Town Engineer, Highway Dept GIS Manager	Completed Map Showing Collection System Outfalls	442 outfalls were previously mapped and the storm drain system map was updated to reflect the results of field inspections (see BMP 3D) in addition to ongoing efforts to incorporate the drainage network from existing subdivision plans. The drainage network is approximately 60% mapped and DPW is working to develop detailed (200-scale) maps for future drainage assessments and asset management. An additional 59 outfalls were identified in the field and inspected in accordance with BMP 3D.	Continue to update the drainage map and GIS data with ongoing mapping efforts (e.g., BMP 3D). Continue to develop a detailed drainage data layer and begin to define drainage catchments based on this information.
3B Revised	Develop Non-Storm Water Discharge Ordinance	DPW Director	Ordinance Adopted by Town Draft article at Town Meeting in year 5	A draft illicit discharge prohibition article under the existing stormwater bylaw was prepared and awaits presentation at an upcoming Town Council meeting.	Present illicit discharge article to the public at an upcoming Town Council meeting for final review.
3C Revised	Develop Illicit Detection Implementation Plan	DPW Director	Plan Developed	Outfall inspections were completed in accordance with the Town's Illicit Discharge, Detection & Implementation Plan (IDDE).	Continue with follow-up actions in accordance with the IDDE plan (see BMP 3D below).
3D Revised	Perform Dry Weather Outfall Assessments	DPW Director, consultant GIS Manager	Prioritized Areas and Number of Outfalls Assessed	100 outfalls in high priority areas were re-inspected and no obvious illicit discharges were observed. All 501 outfalls have been screened for illicit discharges.	Evaluate dry weather flows with respect to the updated water and sewer maps. Conduct additional water quality assessments at outfalls with dry weather flow, as appropriate.
3E Revised	Develop Procedures for Removing Illicit Connections	DPW Director, Consultant	Procedures Developed and Number of Locations Identified	Procedures for the removal of illicit discharges were added to the IDDE plan (BMP 3C) and the legal mechanism is outlined in the IDDE article (BMP 3B).	Document the progress of removing any identified illicit discharges.

3a. Additions.

3F	Setup and Advertise a Hotline for Illicit Discharges	DPW	Log of Complaints and Action Taken.	Coordinated with BMP 2E, DPW handles stormwater issues through written records and calls to the hotline.	Keep log of complaints and action taken. Continue to establish means in which residents may acquire additional stormwater information.
3G	I/I and Sewer Rehab. Program	Town Engineer, DPW Director, Consultant	Prioritization plan and record of corrections	I/I and sewer rehabilitation activities continued. Inspection included 81,000+ feet of pipe, 262 manholes and the temporary installation of 3 flow meters to acquire data to update the hydraulic model. Based on the results of inspection; 8,500+ feet of pipe were lined, 15 spot repairs were performed on pipe, and 468 manhole repairs were performed.	Continue I/I and sewer rehabilitation activities to repair infrastructure.

4. Construction Site Stormwater Runoff Control

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) - Permit Year 7	Planned Activities - Next Permit Term
4A	Ordinance Development for Waste Control	DPW Director, Town Engineer, Conservation, Planning, Consultant	Ordinance Adopted by Town	Stormwater Management bylaws were adopted into the Town's regulations in 2007.	Continue to implement the stormwater bylaw in permit review and enforcement processes.
Revised			Draft bylaw at Town Meeting in year 4		
4B	Formalization of Site Plan Review Procedures	DPW Director, Town Engineer, Conservation, Planning, Consultant	Site Plan Review Procedures Adopted by Town	This BMP has been incorporated into the work discussed under BMP 4A, as part of the stormwater bylaws.	Refer to BMP 4A.
Revised					

4C	Revised Ordinance to Address Storm Water Pollution	DPW Director, Town Engineer, Conservation, Planning, Consultant	Revised Ordinance Adopted by the Town	This BMP has been incorporated into the work discussed under BMP 4A, as part of the stormwater bylaw.	Refer to BMP 4A.
	Revised				
BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 7	Planned Activities – Next Permit Term
4D	Best Management Practice Manual for Developers	DPW Director, Town Engineer, Conservation, Planning, Consultant	Handbook Completed and Adopted by Town	The stormwater bylaw references the MA DEP Handbook for erosion control requirements that are used to review future projects.	Continue to use the handbook for inspections and developer education and implement requirements under the stormwater bylaw.
	Revised		MA DEP Handbook on File		
4E	Formalization of Inspection Procedures	DPW Director, Town Engineer, Conservation, Planning, Consultant	Inspection Procedures Adopted by Town	A standardized checklist was prepared as part of the bylaw work discussed under BMP 4A. This checklist was used by the DPW for construction site inspections at 30 projects throughout the permit term.	Refer to BMP 4A.
	Revised				

4a. Additions.

4F	Establish a Procedure for the Receipt of Information Submitted by the Public	DPW Director, Town Engineer, Conservation	Record number of phone calls to hotline, copies of articles advertising the hotline.	The DPW generally receives calls related to stormwater and handles any problems that arise. This information is coordinated with BMP 2E.	Coordinate with BMPs 2E & 3F, continue to receive and record information by the public regarding construction sites.
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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 7	Planned Activities – Next Permit Term
5A	Procedures for Long Term O&M	DPW Director, Town Engineer, Conservation, Planning, Consultant	Adoption of Procedures by Town	Stormwater Management bylaws were adopted into the Town's regulations in 2007.	Continue to implement the stormwater bylaw and review operation and maintenance requirements.
Revised			Draft bylaw at Town Meeting in year 4		
5B	Review Procedures for Post Construction Impacts	DPW Director, Town Engineer, Conservation, Planning, Consultant	Adoption of Procedures by Town	This BMP has been incorporated into the work discussed under BMP 5A. The Town developed a standardized checklist for review of projects subject to the stormwater bylaws.	No further action.
Revised					
5C	Best Management Handbook for Developers	DPW Director, Town Engineer, Conservation, Planning, Consultant	Handbook Completed and Adopted by Town	The stormwater bylaw references the MA Stormwater Handbook that is used to review projects.	Continue to use the handbook for review of BMP designs under the stormwater bylaw.
Revised			MA DEP Handbook on File Educational Flyers		Continue to distribute educational flyers related to stormwater management.

5a. Additions

5D	Establish a Procedure for the Receipt of Information Submitted by the Public	DPW and Conservation Planning	Record number of phone calls, and copies of letters and other correspondence.	The DPW generally receives calls related to stormwater and handles any problems that arise.	Coordinate record keeping program with the post-construction stormwater bylaw, track calls and records of enforcement.
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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 7	Planned Activities – Next Permit Term
6A Revised	Standard Operating Procedures	DPW Director/Division Heads	Ten Procedures Developed List of current O&M procedures	This BMP has been incorporated into the work discussed under BMP 6H. The work under BMP 6H was updated and the Town adopted standard operating procedures (SOPs).	Incorporate the results of BMP 6H and implement the recommendations for pollution prevention and housekeeping. Adapt SOPs as appropriate to Franklin DPW.
6B Revised	Employee Training	DPW Director/Division Heads	Four Employee Training Sessions Annual training, attendance sheet and copy of program	DPW decided to vary the stormwater topics to focus on specific elements such as E&S control, as compared to the previous annual training sessions that addressed all pollution prevention and good housekeeping topics. On December 1 & 2, 2009 trainings were conducted for Phase II Stormwater Training – Erosion & Sediment Control Techniques and Spill Prevention Control & Countermeasure Plan Training.	Conduct training for the DPW, Highway, Water and Sewer Department employees and evaluate future training needs, as well as varying topics from year to year.
6C Revised	Parking Lot and Road Sweeping	DPW Director/Division Heads	Schedule Developed and Areas Prioritized for Cleaning	Continued routine street sweeping program. All streets are swept once a year and the downtown area is swept twice a year. The previous purchase of a new street sweeper helped to maintain the cleaning schedules.	Continue existing practices for sweeping and enhance cleaning operations based on the availability of equipment and staff time. Consider a method to track sediment volumes.
6D Revised	Spill Response and Prevention	DPW Director/Division Heads	Procedures and Inventory Completed	Inspections and site activities were conducted in accordance with the 2008 SPCC Plan and formal training for the DPW employees was conducted on December 1 & 2, 2009.	Follow the current SPCC Plan and continue with DPW employee training.

6E Revised	Catch Basin Cleaning	DPW Director/Division Heads	Schedule Developed and Areas Prioritized for Cleaning	The Highway Department used the old Water Department vacuum truck to assist with catch basin cleaning.	Begin to evaluate appropriate cleaning frequencies and coordinate maintenance activities with BMP 6H.
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6a. Additions

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 7	Planned Activities – Next Permit Term
6F	Municipal Facilities and Operations Evaluation	DPW & Consultant	Record of inspections, recommendations and improvements. Pollution prevention inspection checklist.	The previous municipal facilities and operations evaluation was updated in June 2009 based on the progress to address the recommendations, as well as current budget figures.	Continue 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.	Work was completed on one stormwater retrofit project and 2 sites are undergoing design (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.	<p>The Town focused on the retrofit design and construction at 3 BMP locations using funding obtained through a MA DEP Section 319 grant. At the site along Panther Way the project was completed in Summer 2009 and is working well. This project resulted 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.</p> <p>Design continued for the remaining 2 BMP retrofits under the s319 grant. The grant also resulted in an extensive classroom education program (BMP 1H) and multiple newspaper articles (BMP 1I).</p> <p>The town owned BMPs listed in the BMP database were re-inspected to update the database and identify any additional retrofit opportunities.</p>	<p>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 waters (BMP 7A & 7B) and evaluate priority cleaning areas and retrofit opportunities. Incorporate maintenance needs into existing operations as funding allows. Continue to monitor and update the BMP maintenance and retrofit database.</p>
6I	Stormwater BMP Maintenance & Drainage System Upgrades	DPW	Record of cleaning activities, # structures cleaned annually	<p>The highway department made repairs and conducted preventative maintenance on 53 Manholes and Catch Basins throughout the permit term. The highway department also replaced 100+ feet of malfunctioning drainage pipe on Anthony Rd and added a Catch Basin to Coronation Drive to remedy an erosion problem.</p> <p>A collection event was held at the Town Hall on October 3, 2009 and 9,193 pounds of waste was collected. The Town has a reciprocal agreement with 8 neighboring communities that allows residents to participate in Household Hazardous Waste Collections on multiple dates.</p>	<p>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.</p>
6J	Make Annual Household Hazardous Waste Collections Available to Residents	DPW & Board of Health	Ongoing resident participation, amount of materials collected		<p>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.</p>

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 7 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Next Permit Term
Revised					

7a. Additions

7A	Evaluate Data and TMDL for the Charles River and Develop a Plan to Improve TMDL Waters	DPW, Conservation, Consultant	Copy of Water Quality Improvement Plan	As discussed in previous Annual Reports, 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 in 2009. On behalf of the Town of Franklin, CEI reviewed the draft TMDL for Nutrients in the Upper/Middle Charles River and submitted comments to MassDEP. Additionally, the Town reviewed the draft North Coastal MS4 Permit that was issued on February 4, 2010 and submitted comments to EPA. Refer to BMP 7A.	Evaluate the final North Coastal MS4 Permit, final TMDL for the Upper/Middle Charles River and expand the water quality strategy developed in 2009 to include specific BMPs (implementation strategy) to meet the TMDL. This effort will consider 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 RDA Permit.
7B	Implement Water Quality Improvement Plan for discharges to 303(d) waters.	DPW & Conservation	Photographs, logs, and BMP descriptions for completed efforts and water quality improvements		This will begin upon development of the implementation strategy and as resources become available.