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Municipality/Organization: Town of Milford, MA

Permit Number: MAR041135

Annual Report Number & Reporting Period: No. 7: March 09-March 10

NPDES Phase II Small MS4 General Permit Annual Report

Part I. General Information

Contact Person: Scott Crisafulli **Title:** Highway Surveyor

Telephone #: 508-473-1274 **Email:** Highway@MilfordMa.com

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: *Scott J. Crisafulli*

Printed Name: Scott J. Crisafulli

Title: Highway Surveyor

Date: 4/30/10

Part II. Self-Assessment

The Town of Milford has completed the required self-assessment and has determined that our municipality is in compliance with the permit conditions. Discussions of the progress on BMPs toward the measurable goals, as well as quantification of some of the programs, are included in the following sections. This Annual Report is based on the current General Permit being administratively continued, as it expired on May 1, 2008 and a new General Permit had not been issued at the time of preparation of this report. Any reference to planned activities in the coming year ("Year 8") is based on the assumption that the Town of Milford will continue to conduct activities to comply with the current Permit conditions until a new Permit takes effect. If a new Permit takes effect within the coming year (May 1, 2010 – May 1, 2011), the Town of Milford may revise the planned activities for "Year 8", in accordance with the new Permit.

Public Education and Outreach

Milford has met the goals of the BMPs in this category and will continue to provide public education in the form of presentations, expansion of collection of stormwater materials in the local library and other Town venues (schools, Town Hall), and postings on the Town website. During this permit year, a general stormwater education presentation with a focus on phosphorus and bacteria was presented to most of the 8th graders (285 students) of Milford Middle School East on February 12, 2010. Stormwater education materials were distributed to 6 Milford Schools, as well as the Town Library, Wastewater Treatment Plant, Milford Water Co., and Town Hall. Electronic files of these materials were programmed into the Town of Milford web site. During Permit Year 8, public education will continue to focus on sources of bacteria and phosphorus in the watershed.

Public Involvement and Participation

Annual clean-ups, scrap metal and used motor oil recycling, and semi-annual hazardous waste pickup days are ongoing programs to fulfill this component.

Illicit Discharge Detection and Elimination (IDDE)

The Town is currently negotiating with a surveyor to provide a budget for complete mapping of the storm drain system. This will provide comprehensive mapping of the entire Town, rather than mapping individual systems in a piece-meal fashion which has been occurring previously. The Town is planning to seek funding at the Fall 2010 Town Meeting.

During Permit Year 7, the Town continued work to rehabilitate the Charles River culvert at Central Street, where elevated bacteria levels have been noted in the past by the Charles River Watershed Association (CRWA). This culvert carries the base flow of the

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 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 8
PE1	Brochures to educate public about stormwater pollution, pollution prevention, importance of reporting illicit dumping	Highway Dept.	Develop brochures in Permit Year (PY) 1. Produce and mail to residents in PY2.	Brochures distributed during PY2. Approximate volume of material removed from catch basins: PY2: 2,400 cubic yards (1598 tons of road sand were purchased by the Town during the previous winter season) PY3: 2,460 cubic yards (2710 tons of road sand were purchased by the Town during the previous winter season) PY4: 3,600 cubic yards (1185 tons of road sand were purchased by the Town during the previous winter season) PY5: 4,500 cubic yards PY6: 342 tons (catch basin and sweepings combined) PY7: 1,600 cubic yards (catch basin and sweepings combined)	Monitor goal of reduction in pollutants in catch basins, observed by catch basin cleaning crews.
Revised					

1. Public Education and Outreach cont'd.

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 – Permit Year 8
PE2 Revised	Brochures to educate business/industry regarding pollution prevention, material storage and handling, housekeeping, disposal practices	Highway Dept.	Develop brochure in PY1. Produce and mail to businesses in PY2.	Brochures distributed during PY2. Approximate volume of material removed from catch basins: PY2: 2,400 cubic yards (1598 tons of road sand were purchased by the Town during the previous winter season) PY3: 2,460 cubic yards (2710 tons of road sand were purchased by the Town during the previous winter season) PY4: 3,600 cubic yards (1185 tons of road sand were purchased by the Town during the previous winter season) PY5: 4,500 cubic yards PY6: 342 tons (catch basin and sweepings combined) PY7: 1,600 cubic yards (catch basin and sweepings combined)	Monitor goal of reduction in pollutants in catch basins, observed by catch basin cleaning crews.
PE3 Revised	Outreach program for local students, civic groups	Highway Dept.	Organize and implement round of presentations for local schools and at least one civic group.	Consultant performed stormwater education PowerPoint presentation for 8 th graders at Milford Middle School East (approximately 285 students) on February 12, 2010.	Continue education campaign about bacterial and phosphorus source issues. Include one (1) public presentation.

1. Public Education and Outreach cont'd.

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 – Permit Year 8
PE4	Educational material in library	Highway Dept.	Organize a group of materials regarding stormwater pollution and make available at library.	Poster "Please Don't Feed the Waterfowl" designed by consultant: Materials distributed to 6 Milford Schools, as well as Town Library, Wastewater Treatment Plant, Milford Water Co., and Town Hall in February, 2010. Electronic file of the poster programmed into Town of Milford's Highway Department web site as of February 26, 2010. In general, the web site receives approximately 11,000 hits per month, but it is unknown how many view the stormwater materials.	Add to and update collection of materials, with a focus on bacteria and phosphorus.
Revised	<i>Educational materials in Town Hall and other locations</i>	Highway Dept.	Hang posters and have materials available in Town Hall.		

2. Public Involvement and Participation

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 – Permit Year 8
PP1	Community cleanup	Highway Dept.	Form volunteer group for annual cleanup. Hold cleanup day and record participants.	Cleanups conducted April 13-15 and October 5-8, 2009 by inmate community service group to pick up litter and perform brush cutting along roadsides and culverts. Four to six inmates per day conducted work on each occasion.	Continue annual cleanup days to reduce amount of debris/trash along waterways and roadways.
Revised					
PP2	Scrap metal and used motor oil recycling	Highway Dept.	Continue to offer recycling program. Record amount of material collected.	Program is ongoing and maintained by the Board of Health. 1,200 gallons of waste/used engine oil collected during calendar year 2009. 1,708 tons of general recyclables recycled in Calendar Year 2009, including 615 tons of scrap metal/white goods.	Continue to offer program and record amounts of materials collected.

2. Public Involvement and Participation cont'd.

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 – Permit Year 8																																																															
PP3	Hazardous waste dropoff days	Highway Dept.	Continue to offer semi-annual dropoff program and record amount of material collected.	<p>Program is ongoing and maintained by the Board of Health.</p> <table border="1"> <thead> <tr> <th>Item</th> <th>CY 2004</th> <th>CY 2005</th> <th>CY 2006</th> <th>CY 2007</th> <th>CY 2008</th> <th>CY 2009</th> </tr> </thead> <tbody> <tr> <td>Auto batteries</td> <td>388</td> <td>409</td> <td>367</td> <td>309</td> <td>327</td> <td>310</td> </tr> <tr> <td>5-gal pails of household batteries</td> <td>6</td> <td>25</td> <td>5</td> <td>5</td> <td>5</td> <td>6</td> </tr> <tr> <td>l.f. of fluorescent bulbs</td> <td>315</td> <td>285</td> <td>375</td> <td>355</td> <td>347</td> <td>347</td> </tr> <tr> <td>C.Y. latex/oil based paint</td> <td>15</td> <td>18</td> <td>15</td> <td>15</td> <td>15</td> <td>18</td> </tr> <tr> <td>Mercury containing devices</td> <td>1524</td> <td>1497</td> <td>505</td> <td>466</td> <td>371</td> <td>371</td> </tr> <tr> <td>lbs electronics</td> <td>4100</td> <td>3779</td> <td>4670</td> <td>5430</td> <td>5742</td> <td>5530</td> </tr> <tr> <td>Propane Tanks</td> <td>N/A</td> <td>N/A</td> <td>388</td> <td>325</td> <td>385</td> <td>391</td> </tr> <tr> <td>Tons Auto Tires</td> <td>N/A</td> <td>N/A</td> <td>2150</td> <td>2120</td> <td>22</td> <td>19</td> </tr> </tbody> </table> <p>All materials listed above were collected during ongoing material-specific collections open 3 days per week, except for latex/oil based paint. Latex/oil based paint was collected in April through November. In addition to the collections listed above, one comprehensive one-day collection event was held, in which 53 full cars and 10 half cars were served.</p>	Item	CY 2004	CY 2005	CY 2006	CY 2007	CY 2008	CY 2009	Auto batteries	388	409	367	309	327	310	5-gal pails of household batteries	6	25	5	5	5	6	l.f. of fluorescent bulbs	315	285	375	355	347	347	C.Y. latex/oil based paint	15	18	15	15	15	18	Mercury containing devices	1524	1497	505	466	371	371	lbs electronics	4100	3779	4670	5430	5742	5530	Propane Tanks	N/A	N/A	388	325	385	391	Tons Auto Tires	N/A	N/A	2150	2120	22	19	Continue to offer drop off program and record amount of material collected.
Item	CY 2004	CY 2005	CY 2006	CY 2007	CY 2008	CY 2009																																																														
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2. Public Involvement and Participation cont'd.

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 – Permit Year 8
PP4	Public meeting	Highway Dept.	Hold public meeting to present proposed bylaw/ordinances for input prior to implementation by end of PY1. Public meeting may also discuss stormwater pollution prevention.	Task completed in PY3.	Task complete.
Revised					

3. Illicit Discharge Detection and Elimination

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 – Permit Year 8
IDD1 Revised	Storm Sewer Map	Highway Dept.	Seek Town Meeting funding in PY1. Complete map in PY2.	Outfall mapping completed by consultant August 2004, at cost of \$8,000. Additional storm sewer elements have been mapped in Project Years 4, 5, 6. The Town is pursuing the services of a surveyor to complete storm drain system mapping for the entire Town.	Task complete (all outfalls). Continue mapping of complete storm drain system.
IDD2 Revised	IDDE program development, identification of problem areas, correction of issues.	Highway Dept.	Conduct outfall sampling in PY2. Number of illicit discharges to be removed in PY3, 4, 5.	Dry-weather field screening completed by consultant Fall of 2005 and "Dry Weather Outfall Investigation Summary Report" completed November 2005. 303 outfalls were inspected at least once during dry weather. New drainage system with deep sump catch basins and oil/gas separators installed in Jefferson Street. PLEASE SEE PART II, SELF-ASSESSMENT FOR DETAILS.	Obtain funding for Phase III removal of sedimentation at the Charles River culvert at Central Street. Re-sample/test outfalls to Charles River between Milford Pond and Central Street. Continue IDDE program.
IDD3 Revised	IDDE program documentation.	Highway Dept.	Submit annual report, including information on IDDE program steps.	One illicit discharge removed. PLEASE SEE PART II, SELF-ASSESSMENT FOR DETAILS. Annual report is hereby submitted.	Future PY annual reports will include information on IDDE program tasks.

3. Illicit Discharge Detection and Elimination cont'd.

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 – Permit Year 8
IDD4 Revised	Storm drain stenciling program, focusing on drains tributary to ponds and known dumping areas. Program extended to brook drains as feasible.	Highway Dept.	Percentage/number of storm drains stenciled annually. Records of catch basin cleaning showing decreased dumping/pollutants in catch basins.	All Town storm drains (approximately 3,079) were stenciled in PY3. However, paint is fading in some areas. The Town is considering options for re-labeling catch basins in the future. Approximate volume of material removed from catch basins: PY3: 2,460 cubic yards (2710 tons of road sand were purchased by the Town during the previous winter season) PY4: 3,600 cubic yards (1185 tons of road sand were purchased by the Town during the previous winter season) PY5: 4,500 cubic yards PY6: 342 tons PY7: 1,600 cubic yards (catch basin and sweepings combined)	Task complete.
IDD5 Revised	Regulation prohibiting non-stormwater discharges to municipal system.	Highway Dept.	Development and implementation of regulation during PY2.	Sections on Prohibition of Illegal Discharges, Prohibition of Illicit Connections, and Waste Disposal Prohibitions included in Stormwater Management bylaw, in effect as of February 9, 2006. One illegal sewer connection from 14 Prentiss Avenue to a town storm drain was removed after legal proceedings with the property owner.	Implement bylaw. Work with property owners to remove illicit discharges as needed.

4. Construction Site Stormwater Runoff Control

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 – Permit Year 8
CR1 Revised	Regulation for erosion/sediment controls, BMPs, construction controls	Highway Dept.	Development and establishment of regulation.	Stormwater Management bylaw requiring stormwater management permit for construction activities disturbing greater than 1 acre approved at Town Meeting on October 24, 2005. The Stormwater Management bylaw was approved by the Attorney General's Office in letter dated February 9, 2006.	Task complete.
CR2 Revised	Mechanism for site plan review, inspections, review procedures	Highway Dept.	Establishment of procedures and number of plans reviewed annually.	The Stormwater Management General By-Law, adopted on October 24, 2005, requires a Stormwater Permit for any construction activity disturbing greater than 1 acre of land except for projects that are required to file a Notice of Intent (NOI) with the Milford Conservation Commission. Such NOIs must include a fully executed Stormwater Management Form and projects must be designed in full compliance with DEP's Stormwater Management Policy. There were 13 projects which filed NOIs with the Conservation Commission, 12 of which were issued Orders of Conditions. Of these, one (1) project was subject to the Stormwater Management By-Law and submitted an Operation and Maintenance Plan which is on file in the Town of Milford's Office of Planning and Engineering.	Implement bylaw.

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 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 8
PCR1	Regulation for BMPs	Highway Dept.	Develop and adopt regulation, measure compliance (# of BMPs, % compliance, etc).	One (1) BMP planned in association with 1 project, which has not yet been constructed. There were no reported violations of the Stormwater Management By-Law associated with BMP requirements.	Continue to implement bylaw.
Revised					
PCR2	Regulatory mechanism for BMP operation and maintenance (O&M)	Highway Dept.	Regulation development and adoption; maintenance of inspection reports.	Stormwater Management bylaw approved at Town Meeting on October 24, 2005 includes Operation, Maintenance, and Inspection Schedule requirements for privately-owned facilities, and assigns maintenance responsibility. The Stormwater Management bylaw was approved by the Attorney General's Office in letter dated February 9, 2006. There were 13 projects which filed NOIs with the Conservation Commission, 12 of which were issued Orders of Conditions. Of these, one (1) project was subject to the Stormwater Management By-Law and submitted an Operation and Maintenance Plan which is on file in the Town of Milford's Office of Planning and Engineering.	Continue to implement bylaw.
Revised					

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 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 8
MGH1 Revised	Street sweeping	Highway Dept.	Continue street sweeping program, note reduction in sediments in catch basins, quantities of material collected.	Street sweeping conducted March through November of 2009: 1,600 cubic yards (sweepings & catch basin cleanings combined) collected at cost of \$76,000. All accepted streets (120 miles) were swept.	Continue program through all permit years.
MGH2 Revised	Catch basin cleanouts	Highway Dept.	Continue catch basin cleanout program. Record number of catch basins cleaned, sediment collected.	The Town conducted annual catch basin cleanouts in June through July of 2009 using an outside contractor. 3333 catch basins were cleaned and a total of 1,600 cubic yards (sweepings & catch basin cleanings combined) of material removed. Total cost of \$41,629.	Continue program through all permit years.
MGH3 Revised	Record keeping/schedule of maintenance	Highway Dept.	Continue to keep listing of regular maintenance activities, schedules, and procedures.	Records added to maintenance file.	Continue to maintain records and update program as needed.
MGH4 Revised	Recycling and waste disposal program	Highway Dept.	Continue recycling and waste disposal program for municipal operations. Record quantities involved in program.	Program ongoing. 8,560 yds of mulched lawn waste collected in Fall of 2009 from 120 miles of Town streets at cost of \$54,669. 405 Christmas trees collected.	Continue program through all permit years.

6. Pollution Prevention and Good Housekeeping in Municipal Operations cont'd.

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 – Permit Year 8
MGH 5	Waste disposal/housekeeping training and practices	Highway Dept.	Continue proper disposal procedures, conduct training, keep logs of material disposal.	Capital Environmental performed a two hour class outlining good housekeeping training and practices related to vehicle equipment fueling, waste ban regulations, waste water, drinking water, storm water, and emergency preparedness to 12 highway department employees on April 21, 2009. 975 gallons of oil/water and 5 drums of oily sand & sludge removed from oil/water separator at the Highway Department Garage in February and October, 2009, at a total cost of \$11,357.	Continue program through all permit years.
Revised					
MGH 6	Identification, inspection, maintenance of Town owned BMPs	Highway Dept.	Inspection and maintenance of structures, maintain records.	<ul style="list-style-type: none"> • Godfrey Brook inlet grates cleaned at Water Street and Hospital Brook on 24 occasions from April 2009 to March 2010. • Major repair on O'Brien Brook at West Street. • Repair of culvert at Westbrook Street due to collapse of one wall. • Maintenance and pointing of various sections of stone walls along Godfrey Brook. • Brush cutting and trash clean up at various detention basins and culverts. • 466 ft of drainpipe installed and 90 ft replaced from April to September 2009. • 57 catch basins or manholes repaired/replaced from March – October 2009. • 2 new catch basins installed in May and September, 2009 • Total budget expense of \$54,683. 	Perform recommended maintenance activities on detention basins. Continue program.
Revised					