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Municipality/Organization: Town of Westford, MA

EPA NPDES Permit Number: MA041232

MADEP Transmittal Number: W-035577

Annual Report Number 7
& Reporting Period: April 1, 2009-March 31, 2010

NPDES PII Small MS4 General Permit Annual Report

Part I. General Information

Contact Person: Paul Starratt, P.E. Title: Town Engineer

Telephone #: 978-692-5520 Email: stormwater@westfordma.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: Jodi Ross

Title: Town Manager

Date: April 28, 2010

Part II. Self-Assessment

The Town of Westford has completed the required assessment and determined that our municipality is in compliance with all permit conditions, except for the following: Stormwater Management Regulations have not been finalized by the Planning Board. The Engineering Department drafted regulations and held three stakeholder meetings in Year 6 to obtain feedback from local developers, attorneys, engineers and watershed organizations with the expectation of Public Hearings in Year 8 and adopting a final regulation by the autumn of 2010. Until the regulations are established, the Planning Board has adopted interim measures that require the submission of a Storm Water Pollution Prevention Plan (SWPPP) and a NOI for Construction General Permit on projects with land disturbance greater than one acre. The Town has issued four (4) Storm Water Management Permits in accordance with the newly approved Stormwater Management Bylaw.

The Town has moved forward with an Illicit Discharge Detection and Elimination plan that includes field inspection of catch basins and manholes by the Westford Engineering Department. Approximately two hundred eleven (211) stormwater basins, fifty six (56) drain manholes and thirty three (33) stormwater outfalls were inspected and investigated for illicit connections. Two (2) unauthorized connections were discovered and determined to be conveyance of stormwater from residential properties. The Town also issued its' first Enforcement Order for violation of the newly approved Illicit Discharge Bylaw.

The Town continues to benefit from the active participation of resident volunteers who participate in the Westford Stream Team Program. Partnerships with the SuAsCo Watershed Community Counsel, the Organization for the Assabet River (OAR) and the Westford Environmental News and Action Committee have been mutually beneficial. The Town Engineer serves on the SuAsCo Stormwater Committee and is working with OAR to develop a River and Stream Continuity Project in Westford.

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 – Interim Period
1A	Stormwater Flyer for Residents	SuAsCo & Westford DPW	Flyers distributed to 75% of residents, compiled & considered "survey" results.	Flyers were mailed in year 1 to all residents. The same flyers were placed on display at the Town Hall. (SuAsCo)	Continue displaying flyers at public places.

Revised	IB	Lesson Plan for 5 th Graders	SuAsCo & Westford DPW	Develop & distribute lesson plan, teach in one or more grade 5 classes. Continued beyond Year 5 based on success of program.	The Westford Engineering Department continued to use the SuAsCo curriculum "Stormwater Matters" to teach an introductory lesson plan to all grade 5 classes during the 2009 Living Lab program.	The Westford Engineering Department has elected to continue the lesson plan on an annual basis with assistance from local schools. Every 5 th grader in the Westford Public Schools participates.
Revised	IC	Stormwater Flyer for Businesses	SuAsCo & Westford DPW	Flyers distributed to 50% of businesses, stormwater logo displayed by 25% of businesses.	<i>Stormwater Matters</i> local business flyer, as prepared by SuAsCo, mailed to all business addresses in Westford (750) with cover letter in Year 5.	Continue to promote stormwater awareness to the local business community.
Revised	ID	Stormwater Media Campaign	SuAsCo & Westford DPW	Media information packet, 4 press releases generated.	Implement SuAsCo Year 6 product Survey and display for Stormwater "Go Green" product at Town Meeting.	Implement SuAsCo Year 7 product upon delivery.
Revised	IE	Stormwater Video	SuAsCo & Westford DPW	Show video at one public meeting and once on local cable.	<i>After the Storm</i> was broadcast on Westford Community Access TV over five times in Year 5.	Rebroadcast <i>After the Storm</i> in 2010.
Revised	IF	Recycling/Trash Info. on Website	Recycling Commission	Update website regularly, display pamphlets in Town Clerk's Office	The Recycling Commission updated the website as needed. http://www.westfordrecycles.org/ Collection calendar at Clerk's Office.	Continue website updates and display pamphlets in Town Clerk's Office
Revised	IG	Recycling/Trash Mailing to Residents	Recycling Commission	Mail to 75% of residents and display pamphlets in Town offices.	Pamphlets were mailed to all residents and copies were made available at the Town Hall.	Continue displaying pamphlets at public places.
Revised	IH	Advertise HHW Info. in Community Phonebook	Recycling Commission	Copy of advertisement in the phonebook.	Information about the household hazardous waste collection was advertised in the local phonebook "2010 Westford Directory" on pages 26-27.	Continue to advertise the proper method of disposal for hazardous household wastes.

II Revised	Advertise Brush/Multi Collection on Cable and in Paper	Recycling Commission	Copy of advertisement on cable, website and local paper.	The brush and multi collection events were advertised on cable, website, the local paper, roadside signs and local phone directory.	Continue advertising the brush and multi collection events.
IJ Revised	Leaf Dumping Article in Paper	Conservation Commission	Copy of article in local paper once per year. Posted on Cons-Comm website	An article discussing the proper disposal of leaves and yard waste is posted on Conservation Commission website.	Continue placing the leaf dumping article in the local paper.
IK Revised	Leaf Dumping Pamphlet to Public	Conservation Commission	Copy of pamphlet, # of residents reached. Publish leaf disposal notice in local phone book	Dates, time, location and contact information for leaf disposal and compost published in local phone book, "2010 Westford Directory" on Page 19.	Continue publishing information on proper leaf disposal and composting.
IL Revised	Leaf Dumping Pamphlet at Events	Conservation/ Water/ Board of Health	Pamphlet displayed at two events.	The leaf dumping educational pamphlet was displayed at the Health Fair and Drinking Water Day.	Continue displaying pamphlet at two events.
IM Revised	Fertilizer Pamphlet to Businesses Town of Westford Pesticide Policy	Water Department	Copy of pamphlet, distributed to all landscaping businesses. Develop Pesticide Policy for Town of Westford	A draft policy was presented and approved by the Board of Selectmen and the Board of Health. The policy was developed with the long-term goal of protecting public health and maintaining balanced and healthy ecosystems for the Town of Westford.	Continue to eliminate where possible and otherwise minimize the use of pesticides on Town-owned land and to encourage the same on private-owned land. Enforce Pesticide Policy.
IN Revised	Fertilizer Info. in Newsletter	Water Department/ Engineering	Copies of semi-annual newsletters discussing fertilizers.	Fertilizer information was included in the annual newsletter prepared by the Westford Water Department and the stormwater pamphlet.	Continue semi-annual distribution of fertilizer information with Water Department newsletter and stormwater pamphlets.
IO Revised	Septic System Pamphlets in Water Department	Water Department	Pamphlets available at Water Department at all times.	Septic system Pamphlets were made available at the Water Department throughout the year.	Continue to make septic system pamphlets available.
IP Revised	Septic System Pamphlets at Events	Water Department/ Board of Health	Display pamphlets at two events.	The septic system educational pamphlet was displayed at the Annual Health Fair and Drinking Water Day.	Continue displaying pamphlet at two events.
IQ Revised	Hazardous Material Bylaw Info. on Website	Board of Health	Maintain website regularly.	Hazardous material bylaw information was posted on the Town's website.	Continue website postings.

1a. Additions

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 – Interim Period
2A Revised	Stormwater Traveling Display	SuAsCo & Westford DPW		Completed in Year 1. Display used at 5 th grade Living Lab program and Town Meeting. SuAsCo “Go Green” display added to Town Meeting.	Continue using the display at the 5 th grade Living Lab program.
2B Revised	Poster Contest for Fifth Grader <i>Revised to 4th Graders</i>	SuAsCo & Westford DPW Westford Water Department	Poster contest is held and entries are received, judged and displayed in year 2.	Annual Water Department 4 th Grade Poster Contest to include pollution prevention. Cash prizes awarded to top three posters from each school.	Continue 4 th Grade Poster Contest
2C Revised	Poster Contest for High Schoolers	SuAsCo & Westford DPW Eliminated from Year 3 product by SuAsCo.	Poster contest is held and entries are received, judged and displayed in year 3.	NOI specified to begin this BMP in Permit Year 3. Eliminated from Year 3 product by SuAsCo. Water Department will hold Poster Contest for 4 th Graders.	Continue 4 th Grade Poster Contest
2D Revised	Local Stormwater Summit Event	SuAsCo & Westford DPW SuAsCo W. C. C. Land and Habitat Working Group	Hold local multi-community summit in year 4.	Completed in Year 4.	Continue information sharing with other stakeholders across the Nashoba Brook sub-basin.

2E Revised	Stormwater Super Summit Event	SuAsCo & Westford DPW	Municipal participation in the Super Summit, stormwater "survey" to 75% residents, compiled & considered results.	Stormwater Super Summit eliminated from SuAsCo Year 5 product	Reevaluate possibility of a future summit with SuAsCo.
2F Revised	Curbside Recycling	Department of Public Works	Continued Town service.	Curbside recycling was picked up every other week.	Continue Curbside Recycling program.
2G Revised	In Town HHW Drop-off	Department of Public Works	Hold at least one event per year. Every other year.	Next household hazardous waste collection event scheduled for the Fall of 2010.	Hold one HHW event and track waste quantities received.
2H Revised	HHW Drop-off in Lexington	Department of Public Works	Advertise service on the Town website and in flyers. Also advertise in local phone book.	Fee based service was reinstated for 2008, one Saturday a month, April-November.	Continue combined effort with Lexington.
2I Revised	Leaf Drop-off at Laughton's Nursery	Department of Public Works	Continue service of leaf drop-off. Advertise on the Town website and in flyers.	Leaf drop off was made available at Laughton's Nursery, but a fee was charged by the nursery to accept materials.	Laughton Farm being developed in 2010. Locate new property for Leaf Drop-off
2J Revised	Brush Drop-off in Westford	Department of Public Works	Hold one collection in April and October.	Four collection events were held during different times in April and October.	Hold at least two collection events.
2K Revised	Multi-Collection Events	Dep't of Public Works/Board of Health	Hold one multi-collection event twice per year.	Two multi-collection events were held to collect small mercury-containing devices.	Hold at least two collection events.
2L Revised	Mercury Drop-off at Board of Health	Board of Health	Collect mercury devices in the Board of Health office daily.	The Board of Health office was open daily to receive mercury-containing devices.	Continue mercury drop-off program.
2M Revised	Mercury Drop-off at Multi-Collection Event	Department of Public Works	Hold one multi-collection event twice per year.	Two multi-collection events were held to collect small mercury-containing devices.	Hold at least two collection events.

2N	Public Meetings	Department of Public Works	Advertise and hold at least one public meeting every year for stormwater.	Update on NPDES Phase II progress and proposed Stormwater Regulations presented at Planning Board. Held 3 Stormwater Stakeholders Meetings to receive comments on proposed Regulations	Hold a public meeting to inform residents of the stormwater program.
Revised		Engineering Department			
2O	Stormwater Contact	Highway Department	Establish contact and include information in pamphlets and on the Town's website.	The Town Engineer was identified as the stormwater contact regarding pollution and complaints in Year 1. Information was posted on the Town's website. Established stormwater email contact at stormwater@westfordma.gov	Update information as needed and continue to include stormwater contact information on the Town's website. Include contact information in educational pamphlets. Track stormwater calls and issues addressed.
Revised	Procedure to Address Public Comment		Record of calls and issues addressed.		

2a. No additions at this time.

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 – Interim Period
3A	Storm Sewer Map	Highway Department/ GIS	Expand and field verify all outfalls by year 5.	The storm sewer map was updated to include 65 newly discovered structures based on field inspections.	Maintain GIS database.
Revised		Engineering Department/ GIS			
3B	Illicit Discharge Bylaw	Engineering/ Conservation	Present draft bylaw to public in year 4, adopt in year 5.	Town issued its' first Enforcement Order for violation of the recently approved Illicit Discharge Bylaw.	Continue to enforce Illicit Discharge Bylaw.
Revised		Board of Health			
3C	Detection & Elimination Plan	Highway Department	Screen 25% of outfalls each year in 4 divided sections of Town.	Approximately 211 stormwater basins, 56 drain manholes and 33 stormwater outfalls were inspected and investigated	Complete source investigations of illicit discharges. Develop a protocol and written strategy for Illicit

Revised			Prioritize areas of known water quality problems for inspections and removal of illicit discharges.	
3D	Illicit Discharge Education for Public	SuAsCo/Public Works/ Highway/ Water/ Board of Health	Continued public education under Control Measures 1 and 2. Partner with Westford Environmental News and Action Committee (WENAC) and the Organization for the Assabet River (OAR) to develop priorities for detection using results from Stream Team testing and Water Quality Report.	Support and encourage public participation and involvement in local Stream Teams and groups that promote environmental awareness and activism.
Revised				
3E	Illicit Discharge Education for Municipal Employees	Highway Department	Education for employees under BMP 6H.	Continue municipal employee training program.
Revised				

3a. No additions at this time.

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 – Interim Period
4A	Wetlands Bylaw	Conservation Commission	Continue to implement existing Wetlands Bylaw.	The Town of Westford Conservation Commission enforced the Westford Wetlands Bylaw and Regulations.	Continue enforcement of Wetlands Bylaw and Regulations.
Revised					

4B Revised	Construction Site Runoff Bylaw	Engineering/ Planning/ Conservation	Present draft bylaw to public in year 4, adopt in year 5.	Stormwater Management Bylaw adopted at Special Town Meeting on May 10, 2008 and approved by Attorney General on August 5, 2008.	Continue enforcement of Stormwater Management Bylaw.
4C Revised	Erosion, Sediment & Waste Controls	Engineering/ Planning/ Conservation	Copies of meeting minutes and memos. Improved site controls in year 4.	Stormwater Management Bylaw adopted at Special Town Meeting on May 10, 2008 and approved by Attorney General on August 5, 2008.	Continue enforcement of Stormwater Management Bylaw.
4D Revised	Site Plan Review Procedures	Engineering/ Planning/ Conservation	Improved site plan review procedures in year 4.	Site plans are currently reviewed by the Engineering Department and Conservation Commission for erosion and construction site runoff BMPs.	Hold progress meetings, evaluate site plan review criteria and incorporate into the draft bylaw for Construction Site Runoff.
4E Revised	Site Inspection & Enforcement	Engineering/ Planning/ Conservation	Records of current enforcement actions, site inspection procedures for all land disturbance >1 acre.	Stormwater Management Bylaw adopted at Special Town Meeting on May 10, 2008 and approved by Attorney General on August 5, 2008.	Continue enforcement of Stormwater Management Bylaw.
4F Revised	Construction Site Contact Procedure to Address Public Comment	Highway Department	Establish contact and include information in pamphlets and on the Town's website. Record of calls and issues addressed.	The Town Engineer was identified as the stormwater contact regarding pollution prevention, complaints and construction runoff in Year 1. Established stormwater email contact at stormwater@westfordma.gov	Update information as needed and continue to include stormwater contact information on the Town's website. Include contact information in educational pamphlets. Track stormwater calls and issues addressed.

4a. No additions at this time.

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 – Interim Period

5A	Post-Construction Site Runoff Bylaw	Engineering/ Planning/ Conservation	Present draft bylaw to public in year 4, adopt in year 5.	Planning Board issued 4 Stormwater Management Permits under the recently adopted Stormwater Management Bylaw.	Continue enforcement of Stormwater Management Bylaw.
Revised					
5B	Structural & Non-Structural BMPs	Engineering/ Planning/ Conservation	BMP design standards specific to the Town of Westford.	BMP design standards were introduced and discussed at the August 9, 2004 kick-off meeting.	Hold progress meetings and evaluate BMPs and design standards desirable by the Town of Westford. Incorporate results into the draft bylaw for Post-Construction Stormwater Management.
Revised	BMP Design Standards				
5C	Long-Term Operation & Maintenance	Engineering/ Planning/ Conservation	O&M Plan/template and procedures required for new and redevelopment	Methods to address BMP operation and maintenance were discussed at the August 9, 2004 kick-off meeting.	Hold progress meetings and evaluate BMP O&M Plans, templates and methods for long-term effectiveness.
Revised					
5D	Structural BMP Implementation Procedures	Engineering/ Planning/ Conservation	Inspection and enforcement procedures to ensure BMPs are installed properly.	Methods to address BMP implementation procedures were not specifically discussed at the August 9, 2004 kick-off meeting.	Hold progress meetings and evaluate methods to inspect and enforcement BMP installation. Incorporate results into the draft bylaw for Post-Construction Stormwater Management.
Revised					

5a. No additions at this time.

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 – Interim Period
6A	Catch Basin Schedule	Highway Department	Clean all catch basins and prioritize locations for cleaning.	All catch basins were cleaned in town at least once and twice on hills. Catch basins are visually inspected during cleaning to ensure proper function of the drainage system.	Continue catch basin cleaning and inspection program annually. Begin recording structure conditions and sediment data for future cleaning and maintenance priorities.
Revised					

6B Revised	Regular Street Sweeping	Department of Public Works Highway Department	Sweep streets a minimum of twice per year.	All streets were swept twice a year in town.	Continue street sweeping program annually.
6C Revised	Sand/Salt Covered	Highway Department	Sand and salt storage is covered.	Sand and salt storage was covered.	Continue to cover sand and salt.
6D Revised	Used Oil is Recycled	Highway Department	Waste oil recycling at the Highway Facility is permitted.	The Highway Department maintained permit compliance for the waste oil heater and recycling operation.	Continue existing practices for waste oil recycling to maintain permit compliance.
6E Revised	Municipal Hazardous Material Stored Inside	Highway Department	All hazardous materials are stored indoors.	The Highway Department stored all hazardous materials indoors.	Continue to store all hazardous materials indoors.
6F Revised	Implement SWPPP at Garage Implement SWPPP BMPs at Garage	Highway Department	SWPPP implemented and maintained. SWPPP BMPs implemented.	The Highway Department implemented BMPs outlined in the Garage SWPPP.	Continue existing practices for pollution prevention and good housekeeping.
6G Revised	Increase Vehicle Fueling Cover	Highway Department	Increase cover until new facility is constructed.	Occupied new facility in September 2006	Utilize covered fueling station at the new DPW Facility.
6H Revised	Municipal Employee Training	Highway Department	All Highway Department employees trained annually, record of attendance sheet. Copy of training program	Highway Department issued copies of Organization for the Assabet River employee training materials to newly hired employees.	Continue existing training programs, incorporate new topics and expand programs as appropriate.
6I	Municipal Operation/Maintenance Plan	Highway Department	Improved operations at municipal facilities and throughout Town.	Municipal facilities are evaluated on a regular basis for pollution issues. Work began to document protocols for	Evaluate and document BMP evaluations and draft BMPs for municipal facilities and operations.

Revised				
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6a. Addition

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 – Interim Period
6J	Mosquito Control Project & Drainage System Maintenance	Engineering/Conservation	Record of improved drainage system inspection and maintenance.	Through the efforts of the Central Massachusetts Mosquito Control Project, brush and other accumulated debris was removed from culverts and streams to ensure proper flow conditions and reduce the amount of stagnant water available for mosquito breeding. Cleaning areas were recorded to determine future cleaning needs.	Continue mosquito control program.
Revised					

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 – Interim Period
				March 2009 Town Meeting approved a \$25,000 capital outlay to complete a TMDL Study in Fiscal Year 2010.	Complete TMDL study.

7a. No additions at this time.

7b. WLA Assessment

Stony Brook in Westford is a 303d listed water that is classified as Category 5 “Waters Requiring a TMDL”. Water quality concerns associated with Stony Brook will be addressed through the implementation of BMPs under the six minimum measures for Phase II, as outlined in the Westford Stormwater Management Plan (SWMP). Stony Brook is highlighted in the Westford SWMP as a priority for