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Municipality/Organization: Ashland

EPA NPDES Permit Number: MAR041086/MADEP

MaDEP Transmittal Number: W-036190

**Annual Report Number
& Reporting Period:** June 2010 to May 2011

NPDES PII Small MS4 General Permit Annual Report

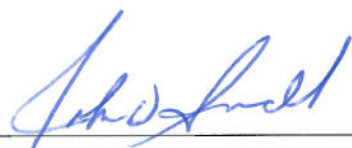
Part I. General Information

Contact Person: John D. Small Title: DPW Director

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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: John D. Small

Title: DPW Director

Date: August 26, 2011

Part II. Self-Assessment

The Town of Ashland is very close to completing the items required for its first NPDES MS4 permit. This week the town freed up some highway budget and contracted with Haley and Ward to complete the town's drainage map and conduct a final round of dry weather outfall inspections. This work was completed in August 2010.

Through the seven years of this permit the Town has struggled to find the resources to conduct the work required by this unfunded Federal mandate. The Town employees that voluntarily made this important work part of their jobs have either left the Town or their positions have changed making it difficult to focus on the NPDES MS4 program.

With the current economic crisis, Towns across the Commonwealth are struggling to balance their budgets, and Ashland is no exception. From public safety to Town Hall to schools, every aspect of the Town is being impacted by the financial crunch. Lay-offs have taken place, hours have been reduced and employees are being stretched thin just to cover the basic services expected by town residents.

The Town of Ashland is very concerned that the next phase of the NPDES MS4 program will include requirements that the Town cannot afford to complete. While the Town does care greatly for the environment and believes that stormwater pollution is an important problem to address, the Town must be fiscally responsible. We implore the EPA to make the next MS4 permit easy to comply with given limited resources, or to provide a Federal funding mechanism to make compliance possible without putting undue pressure on local budgets.

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 Permit Year
1-1	Design and Distribute Brochures	DPW/Con Com	Educate the Public Via Sewer & Water Bills and brochures	Conducted stormwater outreach at 2010 Ashland Day and 2011 Earth Day. Distributed brochures during monthly house hold hazardous waste collection days.	Continue outreach via Ashland Day, Earth Day, HHWD, and bill stuffers, including trash and water bills.
1-2	Air Stormwater Information on Local CA/TV Station	DPW/Con Com	Educate the public	Goal eliminated	Goal eliminated
1-3	Form a Stormwater Committee (SWC)	Con Com	Inform the public	SWC dissolved after stormwater regulations adopted by Conservation Commission	Goal achieved.
1-4	Label Storm Drains	SWC	Ensure ongoing public education	Goal completed last year. Will revisit before paint fades.	Acquire new storm drain stencils and enlist student volunteers to re-label appropriate storm drains.
1-5	High School Education	SWC	Educate the younger public	Conducted stormwater presentation and storm drain stenciling activity with high school environmental science classes.	Same as last year
1-6	Create Stormwater section of Website	DPW/Con Com	Activate new website	Website activated	Goal achieved.

1a. Additions

1-7	Make the stormwater management plan available to the general public	DPW/Con Com/MIS	Post plan to stormwater section of the website	Goal eliminated.	Goal eliminated.
1-8	Stormwater management media campaign	Con Com	Reach out to media for local coverage on stormwater management issues	No stormwater articles published this calendar year.	Continue publishing stormwater-related articles.
1-9	Stormwater traveling display	SWC	Develop display and showcase in three public locations.	In this program year, the display was set up in the Ashland Public Library, Ashland Town Hall and the Ashland Community Center, in addition to the Earth Day and Ashland Day events.	Continue to move display throughout public buildings and events.
1-10	Conduct stormwater education at household hazardous waste day	DPW	Show stormwater display; distribute stormwater brochures	Stormwater brochures will be distributed at May 2011 HHWD.	Continue outreach program at HHWD.

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 Permit Year
2-1	Enlist Local Citizens to the SWC	SWC	Involve local people in the development of the SWMP	Advertised on website, cable TV and newspaper for interested residents to join the Stormwater Committee. Garnered interest from three concerned citizens, one of whom became a new Conservation Commissioner.	Goal achieved.
2-2	Enlist local groups to label storm drains	SWC	Public aids in SW education	Labels from last year's Eagle Scout project are still visible; no need to repaint this year.	See BMP 1-4.
2-3	Form a Technical Committee	Highway Superintendent	Review and oversee stormwater issues	Educate Technical Review Committee about stormwater management and LID techniques by airing "Reining in the Storm" video at technical review committee meeting	Goal achieved.

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 Permit Year
3-1	Create a Drainage Map	Water & Sewer Department DPW Director	Map MS4	Map completed.	Goal achieved.
3-2	Adopt an Illicit Discharge By-Law	Water & Sewer Department DPW Director/Conservation Agent	Town Adopts By-Law	Goal achieved with passage of Stormwater Management Bylaw in 2007.	Goal achieved.
3-3	Enforcement of By-Law	DPW Director	Discourage Violations	Stormwater Management Regulations promulgated by the Conservation Commission on May 28, 2008. Regulations prohibit illicit discharges and includes provisions for fining violators of the bylaw.	Goal achieved.
3-4	Train Staff & SWC in Outfall Inspection	DPW Director/Com Agent DPW Director/Conservation Agent	Develop Inspection Program	No progress made.	Conservation Agent or consultant to train DPW staff to conduct IDDE work.
3-5	Provide Dry Weather Inspections to Outfalls	SWC, TC & DPW	Detect Illicit Discharges	100% of outfalls inspected during dry weather conditions	Goal achieved.

3a. Additions

3-6	Implement regular water quality sampling at outfalls	DPW/Con Com	Detect illicit discharges and problem areas	Goal abandoned	None

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 Permit Year
4-1	Adopt an Erosion/Sediment Control By-Law	Con Com/DPW	Adopt By-Law	Goal achieved.	None.
4-2	Requirements and Procedures for Site Waste	Inspection services, planning board, DPW, SWC	Reviewing By-law. Include provisions to control site waste in proposed by-law. Establish inspection policy and schedule and note and correct deficiencies.	Goal achieved.	None.
4-3	Procedures for site plan review	Planning Board	Ensure by-law includes provisions for site plan review. Consider providing guidance documents and other outreach materials to developers.	Goal achieved.	None.
4-4	Procedure for enforcement	Con Com	Discourage Violations and fine violators	Goal achieved.	None.

4a. Additions

4-5	Ensure construction site operators disturbing one acre or more implement sediment and erosion controls BMPs	Inspection services, Con Com, DPW, Planning Board, SWC	Establish inspection policy and schedule. Conduct routine inspections and note deficiencies.	Ongoing.
4-6	Develop procedures for receipt and consideration of information submitted by the public	Inspection services, Con Com, DPW, Planning Board, SWC	Develop a form for the public to provide information and designate municipal official to receive information.	No progress made. Create form and post it to the website.

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
5-1	Adopt Stormwater Management Policy	Water & Sewer Department DPW Director and Con Com Agent	Town Adopt By-Law	Stormwater Management Regulations drafted and promulgated at May 28, 2008 Ashland Conservation Commission public hearing.	Goal achieved.
5-2	Procedures for review of Stormwater BMP's	Water & Sewer Department Planning Board Agent and Con.Com. Agent	Ensure Proper BMP's are in place.	Stormwater Management Regulations drafted and promulgated at May 28, 2008 Ashland Conservation Commission public hearing.	Goal achieved.
5-3	Procedures for long term operation & maintenance	Water & Sewer Department DPW, Planning and Con.Com. Agent	Ensure stormwater by-law includes language providing DPW authority to ensure proper O&M of all BMPs connecting to MS4.	Stormwater Management Regulations drafted and promulgated at May 28, 2008 Ashland Conservation Commission public hearing.	Goal achieved.

5a. Additions

5-4	Identify structural and non-structural best management practices appropriate for the Town	Planning Board, DPW, Con Com, Stormwater Committee	Identify standard practices that are not acceptable in the Town.	Stormwater Management Regulations drafted and promulgated at May 28, 2008 Ashland Conservation Commission public hearing.	Goal achieved.
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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 (Reliance on non-municipal partners indicated, if any)	Planned Activities Permit Year 6
6-1	Catch Basin Cleaning Program	Highway Superintendent DPW Director	Prevent Sedimentation Entering MS4	Due to budgetary constraints, no catch basins were cleaned in permit year 7.	\$12,000 set aside in fiscal year 2012 to clean 25-50% of the town's catch basins.
6-2	Street Sweeping Program	Highway Superintendent DPW Director	Prevent Sedimentation Entering MS4	Swept approximately 85 miles of roadway and all town-owned parking lots, removing approximately 50 cubic yards of material. A 100 yard pile of street sweepings is seeded and stable.	Continue street sweeping program.
6-3	Procedures for Housing Salts & Hazardous Materials	Highway Superintendent DPW Director	Prevent Leachate Entering MS4	Salt stored in shed. Material from street sweeping and catch basin cleaning are disposed of properly by contractor.	Continue existing program.
6-4	Procedures for Handle CB Cleaning	Highway Superintendent DPW Director	Prevent Leachate Entering MS4	Stored separate from other materials and properly disposed of by contractor.	Continue existing program.

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 3 (Reliance on non-municipal partners indicated, if any)	Planned Activities Permit Year 4
7-1					
7-2					
7-3					

7a. Additions

7b. WLA Assessment

Part IV. Summary of Information Collected and Analyzed

Part V. Program Outputs & Accomplishments (OPTIONAL)

Programmatic

Stormwater management position created/staffed	No	
Annual program budget/expenditures		

Education, Involvement, and Training

Estimated number of residents reached by education program(s)	90% (with bill stuffers)	
Stormwater management committee established	Yes	
Stream teams established or supported	Failed to revive	
Household Hazardous Waste Collection Days		
▪ days sponsored	13	
▪ community participation	25%	

Purchased Stormwater Matters lesson plans from the SuAsCo Watershed Community Council and distributed to all 5 th grade teachers for use in their weather/water cycle science units.	5 th Grade

Legal/Regulatory

	In Place Prior to Phase II	Under Review	Drafted	Adopted
Regulatory Mechanism Status (indicate with "X")				
▪ Illicit Discharge Detection & Elimination				X
▪ Erosion & Sediment Control				X
▪ Post-Development Stormwater Management				X
Accompanying Regulation Status (indicate with "X")				
▪ Illicit Discharge Detection & Elimination				X
▪ Erosion & Sediment Control				X
▪ Post-Development Stormwater Management				X

Mapping and Illicit Discharges

Outfall mapping complete	100%
Estimated or actual number of outfalls	200
System-Wide mapping complete	100 %
Mapping method(s)	
▪ Paper/Mylar	25 %
▪ CADD	25 %
▪ GIS	25 %
▪ Field	25%
Outfalls inspected/screened	100%
Outfalls with flow	Few
New outfalls mapped	Dozens
Illicit discharges identified	Few

Illicit connections removed	1
% of population on sewer	70 %
% of population on septic systems	30 %

Construction

Number of construction starts (>1-acre)	0
Estimated percentage of construction starts adequately regulated for erosion and sediment control	100%
Site inspections completed	100%
Tickets/Stop work orders issued	0
Fines collected	\$0
Complaints/concerns received from public	0

Post-Development Stormwater Management

Estimated percentage of development/redevelopment projects adequately regulated for post-construction stormwater control	All requiring site plan review
Site inspections completed	100%
Estimated volume of stormwater recharged (gpy)	unknown

Operations and Maintenance

Average frequency of catch basin cleaning (non-commercial/non-arterial streets)	Once every 2 years
Average frequency of catch basin cleaning (commercial/arterial or other critical streets)	Once every 2 years
Total number of structures cleaned	976
Qty. of screenings/debris removed from storm sewer infrastructure	20 tons
Disposal or use of sweepings (investigating beneficial use for landfill cap)	TBD
Cost of screenings disposal	TBD

Average frequency of street sweeping (non-commercial/non-arterial streets)	1 times/yr
Average frequency of street sweeping (commercial/arterial or other critical streets)	1 times/yr
Qty. of sand/debris collected by sweeping	60 tons
Disposal of sweepings (investigating beneficial use for landfill cap.)	TBD
Cost of sweepings disposal	TBD
Vacuum street sweepers purchased/leased	0
Vacuum street sweepers specified in contracts	N

Reduction in application on public land of: ("N/A" = never used; "100%" = elimination)	
▪ Fertilizers	100
▪ Herbicides	100
▪ Pesticides	100

Anti-/De-Icing products and ratios:	
<ul style="list-style-type: none"> • 100% NaCl used on most roads. • Low salt areas treated with 50% NaCl, 50% sand • CaCl₂ is kept on hand for pretreatment but rarely used 	
Pre-wetting techniques utilized	N
Manual control spreaders used	Y
Automatic or Zero-velocity spreaders used	N
Salt pile(s) covered in storage shed(s)	Y