

4/26/11



TOWN OF WESTBOROUGH MASSACHUSETTS

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DEPARTMENT OF PUBLIC WORKS

131 OAK STREET
WESTBOROUGH, MA 01581-3317
TEL. (508) 366-3070
FAX 366-3074

John M. Walden, Manager
Richard Voutas, Assistant Manager
Carl J. Balduf, P.E., P.L.S., Town Engineer

Dennis Cote, Operations Manager
Joan Provost, Business Administrator

April 19, 2011

Glenda Velez - CIP
U.S. Environmental Protection Agency - Region 1
5 Post Office Square – OEP06-01
Boston, MA 02109-3912

RE: NPDES Phase II Small MS4 General Permit
EPA NPDES Permit No MAR041173

Dir Sir/Madam:

Enclosed is the Annual Report for Permit Year 8.

If you have any questions, please call me at (508) 366-3070.

Sincerely,

John M. Walden
Manager
Department of Public Works

cmp

**TOWN OF WESTBOROUGH, MA
DEPARTMENT OF PUBLIC WORKS**

Annual Report

FOR

***NPDES PHASE II
SMALL MS4
GENERAL PERMIT***

YEAR 8



Department of Public Works

John M. Walden, Manager

April 19, 2011

NPDES PII Small MS4 General Permit
Annual Report – Year 8

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Part 2: Appendix

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- 2. Copy of the cable TV ad
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Enter your transmittal number

X237953

Transmittal Number

Your unique Transmittal Number can be accessed online: <http://mass.gov/dep/service/online/trasmfrm.shtml>

Massachusetts Department of Environmental Protection

Transmittal Form for Permit Application and Payment

1. Please type or print. A separate Transmittal Form must be completed for each permit application.

2. Make your check payable to the Commonwealth of Massachusetts and mail it with a copy of this form to: DEP, P.O. Box 4062, Boston, MA 02211.

3. Three copies of this form will be needed.

Copy 1 - the original must accompany your permit application. Copy 2 must accompany your fee payment. Copy 3 should be retained for your records

4. Both fee-paying and exempt applicants must mail a copy of this transmittal form to:

MassDEP
P.O. Box 4062
Boston, MA
02211

* Note: For BWSC Permits, enter the LSP.

A. Permit Information

MAR041173

1. Permit Code: 7 or 8 character code from permit instructions

2. Name of Permit Category

NPDES Phase II Permit Annual Report-Yr 8

3. Type of Project or Activity

B. Applicant Information - Firm or Individual

Town of Westborough

1. Name of Firm - Or, if party needing this approval is an individual enter name below:

Jane

Rod

2. Last Name of Individual

3. First Name of Individual

4. MI

Chairman, Board of Selectmen, Town Hall

5. Street Address

Westborough

MA

01581

508-366-3076

6. City/Town

7. State

8. Zip Code

9. Telephone #

10. Ext. #

John M. Walden

jwalden@town.westborough.ma.us

11. Contact Person

12. e-mail address (optional)

C. Facility, Site or Individual Requiring Approval

1. Name of Facility, Site Or Individual

2. Street Address

3. City/Town

4. State

5. Zip Code

6. Telephone #

7. Ext. #

8. DEP Facility Number (if Known)

9. Federal I.D. Number (if Known)

10. BWSC Tracking # (if Known)

D. Application Prepared by (if different from Section B)*

1. Name of Firm Or Individual

2. Address

3. City/Town

4. State

5. Zip Code

6. Telephone #

7. Ext. #

8. Contact Person

9. LSP Number (BWSC Permits only)

E. Permit - Project Coordination

1. Is this project subject to MEPA review? [] yes [] no
If yes, enter the project's EOE file number - assigned when an Environmental Notification Form is submitted to the MEPA unit:

EOEA File Number

F. Amount Due

DEP Use Only

Permit No:

Rec'd Date:

Reviewer:

Special Provisions:

- 1. [X] Fee Exempt (city, town or municipal housing authority)(state agency if fee is \$100 or less). There are no fee exemptions for BWSC permits, regardless of applicant status.
2. [] Hardship Request - payment extensions according to 310 CMR 4.04(3)(c).
3. [] Alternative Schedule Project (according to 310 CMR 4.05 and 4.10).
4. [] Homeowner (according to 310 CMR 4.02).

Check Number

Dollar Amount

Date

Municipality/Organization: Town of Westborough

EPA NPDES Permit Number: MAR041173

MA DEP Transmittal Number: X237953

Annual Report No & Report Period: No. 8- March 2010-March 2011

NPDES PII Small MS4 General Permit

Annual Report

Part I. General Information:

Contact Person: John M. Walden, Manager, Department of Public Works,

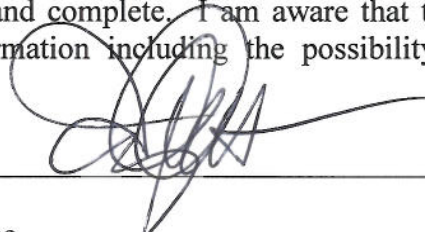
Telephone #: (508) 366-3070

Email: jwalden@town.westborough.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: Rod Jane

Title: Chairman, Board of Selectmen

Date: April 19, 2011

1.0 INTRODUCTION AND BACKGROUND:

In 1990, The United States Environmental Protection Agency (EPA) began implementing a storm water management program under the National Pollutant Discharge Elimination System (NPDES). This program, know as Phase I of the NPDES storm water program, was intended to reduce pollution in storm water discharges for large urban areas with population of 100,000 or greater.

On December 1999, the Phase II Rule of the NPDES storm water program was published to address Municipal Separate Storm Sewer Systems (MS4s) within urban areas of populations less than 100,000 that were not addressed under the Phase I program. Objectives of the Phase II rule is for the MS4s to develop, implement and enforce a storm water program designed to reduce the discharge of pollutants to the maximum extent practicable, to protect water quality, and to satisfy the appropriate water quality requirements of the Clean Water Act.

On May 1, 2003, the EPA issued the General Permit for Storm Water Discharges from MS4s. The general permit requires that the storm water program for each MS4 submit an annual evaluation. The following report contains information regarding the activities on the storm water program for the previous calendar year. The report contains the information required in the general permit as follows: (a) Self- Assessment Review of Compliance with the Permit Conditions; (b) Assessment of the Appropriateness of the selected BMPs; (c) Assessment of the Program towards Achieving the Measurable Goals; (d) Summary of the Results of Any Information that has been Collected and Analyzed; (e) Discussion of Activities for the Next Reporting Cycle; (f) Discussion of any Changes in Identified BMPs or Measurable Goal; and (g) Reference any Reliance on another Entity for Achieving any Measurable Goal.

The Town of Westborough filed the NPDES Phase II Storm Water Management Plan in March 2003. The Town submitted the Annual Report for year one on May 4, 2004, year two on April 25, 2005, year three on April 27, 2006, year four on April 30, 2007, year 5 on April 30, 2008, year 6 on April 30, 2009, and year 7 on April 27, 2010. The original permit was intended to cover a five year period; however, it is now entering its ninth year. A draft permit was issued on Nov. 2010 with comments closing in March 2011. It is not known when the final new permit will be issued, but it is suspected to be within this reporting period.

2.0 SELF-ASSESSMENT REVIEW OF COMPLIANCE WITH THE PERMIT CONDITIONS:

Permit Year 8 – Ending March 2011

Public Education and Outreach

- The Town did not procure new materials from the SUASCO Watershed Community Council to aid in public outreach requirements of the permit. DPW was required to trim spending because of the difficult economic times. This decision will be re-evaluated in the future. Past outreach material was used again this year.
- Educational posters and post cards have been displayed around town.
 - a. A special Stormwater Display was at Spring Festival in early May 2010.
 - b. A special Stormwater Display was at the Westborough Library in July 2010.
 - c. The Senior Center had a stormwater display in late July-mid August 2010.
 - d. Central One Credit Union displayed an informational board about water conservation. It included information on the stormwater program and rain barrels. The display was exhibited on Oct 28, 2010.
 - e. See **Appendix 1** for photos of Stormwater displays around town.
- Westborough TV aired a Stormwater Matters Outreach and Participation Ad Campaign consisting of seven ads, each one covering a specific stormwater theme such as lawn care, car care, picking up after pets, not littering, and keeping storm drains clean. This series of ads was run through the month of November, 2010 and April, 2011. (**Appendix 2**)
- The Town held a photo contest for High School Students in April-May 2010. The contest was judged in mid-May. The theme of the photos was “Keeping Our Water Clean”. The students had a lot of fun taking pictures for this contest. There were approximately 40 contestants. The winners were displayed around town throughout the year and displayed on our website. The contest may be duplicated in years to come, as the availability occurs. (See **Appendix 3** for contest application and photos)
- In April 2011, the Junior Civil Engineer gave a lesson to High School students on water recharge and why it’s important. (See **Appendix 4**)
- The Town has renewed their involvement in the Rain Barrel program. This will help the local watershed by slowly releasing rainwater from the rain barrels into resident’s gardens. This will decrease stormwater runoff and pollution as well as help to recharge the groundwater. Copies of the flyers are in **Appendix 5**.
- The Town continues to hold a “Town Wide Earth Day Clean-Up” every year. This year, on April 16, 2011, volunteers of all ages came together to pick up litter from around our lakes, streams and streets. (See **Appendix 6**)

Illicit Discharge Detection and Elimination

- Progress has been made in mapping the drainage system.
 - **Detention basins:** The majority of detention basins in town have been mapped in GIS. As-built information has been collected for all newly constructed detention basins and water quality inlets. We are currently working on linking the invert data with the GIS map.
 - **Drain pipes:** Pipes are being added to the GIS map in locations where they are not currently shown. We have a Senior Citizen Volunteer who is working on this.
 - **Drainage Structures:** The EPA provided interns to the Town, from July 20-23 2010, to assist in mapping the drainage system. They collected 160 GPS points in three days, and the data has been added to our GIS drainage map. Drainage points include catch basins, drain manholes, drop inlets, culverts, outfalls and control structures.
 - The drainage map has been updated and is in **Appendix 7**.
- Sewer System Evaluation Study (SSES): The DPW continues through contract with AECOM to perform work on its \$463,000 SSES program. Late in 2010, and throughout January, February and March 2011, approximately 800 residences were inspected both inside and outside for illicit connections. The results will be summarized and reviewed with Town personnel in the summer of 2011 to verify the results and the Town will work with private owners to remedy the problem.

Construction Site Runoff Control

- June 2009, the Town began issuing and keeping track of all Stormwater Permits for projects that disturb over 5,000 square feet of land. Plans are continuously being reviewed for site runoff control. These projects have been permitted with local Stormwater Pollution and Prevention Plans. Construction inspections continue for all projects. (see **Appendix 8**)

Post Construction Runoff Control

- The Conservation Agent continues to alert over 200 commercial, industrial and high density residential properties of their obligation to continue maintenance of detention basins and cleaning of catch basins, along with any other general BMP maintenance. The Agent continues to personally visit each commercial property to assess their compliance with his recommendations to maintenance. The Agent is improving on his inspection process each year and has noticed improvements in the maintenance of commercial properties since he started the program in 2005. Information on how businesses can help reduce stormwater pollution is included in each mailing. A memo from the Conservation Agent is in **Appendix 9**.
- New personnel were trained on how to inspect erosion and sedimentation control BMPs at construction sites. DPW personnel have attended workshops on Storm Water Compliance on construction sites.

Good Housekeeping

- The Town's Assistant Conservation Officer worked with the DPW's yearly detention basin maintenance program to assure that all municipally owned

detention basins are cleaned once a year, and all seven schools have had their basins thoroughly cleaned three times in the last 5 years, and rebuilt as necessary. (See **Appendix 10** for a list of detention basins maintained yearly)

- Management of Pesticides and Fertilizer application is monitored each year. (See **Appendix 11** for report)
- Highway Operations (See **Appendix 12**):
 - 75% of catch basins were cleaned. Problematic basins cleaned after every rain storm.
 - Approximately 27 Catch basins repaired in 2010.
 - Open channel cleaning done on: Brady Rd. Ext., E. Main St., W. Main St., Armstrong School, Gibbons School & Rogers Rd.
 - All streets are swept in the spring and fall. Downtown is swept every other week in the summer.

3.0 ASSESSMENT OF THE APPROPRIATENESS OF THE SELECTED BMPS:

The Best Management Practices (BMPs) selected for the stormwater program appear to be appropriate. Recently hired engineering staff, as well as DPW operations employees, has been trained on our methods for stormwater management.

4.0 LIST OF ACTIVITIES FOR THE NEXT REPORTING CYCLE

1. The Town will continue to air the stormwater video on cable TV.
2. Display the educational posters and post cards through out town.
 - Town Hall will have a special display in mid-summer
 - Stormwater display will be at Town Meeting in mid-May
 - Sewer vs. Drain display will be held in early June
 - The Library will have a stormwater display.
 - The Senior Center will have a stormwater display.
3. The Town will continue to ask for volunteers to mark/stencil the catch basins, especially those that are in critical areas around town. The Girl Scouts seem interested in this project at this time.
4. The Town will continuously update the Drainage Map with new structures and complete the mapping of all drain pipes.
5. The Town will continue to hold a “Town Wide Earth Day Clean-Up” every year.
6. The Town’s Assistant Conservation Officer is drafting a Stormwater Management Plan for the schools, Senior Center, and other public properties.
7. The Town’s Assistant Conservation Officer will continue to alert the commercial properties of their obligation to maintain their drainage infrastructure.
8. The Town is continuously evaluating the illicit discharge bylaw. No illicit discharges have been found to date. Continuous evaluation of discharges will occur, and proper action will take place to correct any illicit connections.
9. The Town will continue to review and implement the Stormwater Bylaw.
10. The Town will continue to perform preconstruction review of BMPs.
11. The Town will periodically train/retrain employees.

12. The Town will file an NOI if the Draft General Permit for Stormwater Discharges from Small MS4 in Massachusetts Interstate, Merrimack and South Coastal Watersheds is finalized and issued. If not, the Town will proceed under the guidelines of the 2003 permit as noted above.

5.0 TABLE 1 - BEST MANAGEMENT PRACTICES

Attached is a copy of our implementation schedule, as included with our NOI, as modified to reflect our progress in year seven. The Board of Selectmen continued with its decision not to have a committee oversee the program, but to utilize current staff in lieu thereof.

TABLE 1
TOWN OF WESTBOROUGH, MASSACHUSETTS
NPDES PHASE II
STORM WATER MANAGEMENT PLAN
BEST MANAGEMENT PRACTICES (BMPS)

PUBLIC EDUCATION AND OUTREACH

ID	BMP CATEGORY	BMP	DEPARTMENT RESPONSIBLE FOR IMPLEMENTING BMP	MEASURABLE GOALS	PROGRESS ON GOAL PERMIT YEAR 8	PLANNED ACTIVITIES
5.1.1	Homeowners	Mail educational flyer with stormwater survey	SuAsCo Council and DPW	Flyer distribution. Compile and evaluate survey results	Completed	Completed
5.1.2	Students	Teach stormwater lessons to fifth grader students	SuAsCo Council and DPW	Prepare and implement lesson	Completed. In April 2011, the Junior Civil Engineer gave a lesson to High School students on water recharge and why it's important.	Repeat lesson as availability occurs
5.1.3	Businesses	Mail educational flyer with stormwater survey	SuAsCo Council and DPW	Flyer distribution Logo Display	Completed. Letter from Conservation Agent informing businesses of their duties to clean their detention basins.	Continue each year.
5.1.4	General Public	Hold a stormwater media campaign Show a stormwater video on a local cable station Display Educational Posters and Post Cards	SuAsCo Council and DPW SuAsCo Council and DPW	4 press releases Develop and air stormwater video Distribute posters and post cards	Completed Completed. Aired on Cable TV twice/yr. Completed. Displayed educational posters and post cards and book marks at Library, Town Hall, and DPW	Completed Continue to air video Continue to display

PUBLIC PARTICIPATION AND INVOLVEMENT

ID	BMP CATEGORY	BMP	DEPARTMENT RESPONSIBLE FOR IMPLEMENTING BMP	MEASURABLE GOALS	PROGRESS ON GOAL PERMIT YEAR 8	PLANNED ACTIVITIES
5.2.1	Homeowners	Circulate stormwater traveling display	SuAsCo Council and DPW	Develop display Feature at 3 locations	Completed. Displayed posters at Earth Day Program, Spring Festival and Town Meeting. Continue promoting Rain Barrel Program.	Continue to display + promoting rain barrel program.
5.2.2	Students	Poster contest for fifth graders Photo contest for high school students	SuAsCo Council and DPW SuAsCo Council and DPW	Hold poster contest Hold photo contest, judge and display entries	Completed Completed. Photo contest was held in April-May 2010.	Completed Repeat photo contest as availability occurs.
5.2.3	General Public	Hold a local stormwater summit Hold a watershed-wide stormwater summit	SuAsCo Council and DPW SuAsCo Council and DPW	Advertise and hold summit Advertise and hold summit	Completed Not Completed Must be coordinated by SUASCO	Hold Summit
5.2.3(new)	General Public	Catch Basin Stenciling	SuAsCo Council, Westborough Community Land Trust and DPW	Catch Basin Stenciling	Completed. No volunteers available this year.	Continue, as help is available, to mark more storm drains.
5.2.3(new)	General Public	Earth Day Clean-Up	Westborough Community Land Trust	Earth Day Clean-Up	Completed. Volunteers gathered to clean-up around the waterways and streets.	Continue every year.

ILLCIT DISCHARGE DETECTION AND ELIMINATION

ID	BMP CATEGORY	BMP	DEPARTMENT RESPONSIBLE FOR IMPLEMENTING BMP	MEASURABLE GOALS	PROGRESS ON GOAL(S) PERMIT YEAR 8	PLANNED ACTIVITIES
5.3.1	Stormwater system mapping	<p>Map outfalls</p> <p>Map pipes manholes and catch basins</p> <p>Map structural BMPs (i.e. detention basins, water quality inlets, etc)</p>	<p>DPW</p> <p>DPW</p> <p>DPW</p>	<p>Prioritize outfalls. Percentage of total outfalls mapped per year</p> <p>Prioritize areas. Percentage of total system</p> <p>Percentage of total structures</p>	<p>The EPA provided interns to the Town, from July 20-23, to assist in mapping the drainage system. They collected 160 GPS points and the data has been added to our GIS drainage map.</p> <p>Pipes are being added to the GIS map We have a Senior Citizen Volunteer who is working on this.</p> <p>100% of known municipal detention basins mapped in GIS</p> <p>As-builts collected for all newly constructed detention basins and water quality inlets. We are currently working on linking the invert data with the GIS map.</p>	<p>Complete GPS location of outfalls as they become available</p> <p>Complete location of structures and pipes. Complete mapping of system.</p> <p>Update map as new BMPs are constructed</p>

ILLCIT DISCHARGE DETECTION AND ELIMINATION

ID	BMP CATEGORY	BMP	DEP. RESPONSIBLE FOR IMPLEMENTING BMP	MEASURABLE GOALS	PROGRESS ON GOAL(S) PERMIT YEAR 8	PLANNED ACTIVITIES
5.3.2	Regulatory Mechanism	Develop a bylaw prohibiting non storm water discharges into storm sewer system Develop enforcement procedures for non storm water discharges including illegal Dumping	DPW and/or Board of Health	Formation of a technical committee and annual review of program. Development of a bylaw Development of enforcement procedures	Completed. Review of Illicit Discharge Bylaw is being done regularly Completed. Enforcement included in the Bylaw	Continue to implement Bylaw Continue to implement Bylaw
5.3.3	Illicit Discharge Detection and Elimination Plan	Identify areas likely to have illicit discharges Develop and implement a plan to detect and address illicit discharges Implement illicit discharge detection and elimination inspection	DPW DPW DPW	Develop record keeping. Prioritize outfalls. Percentage of outfalls inspected Plan Completion Identify and train inspection agents. Begin inspections	Town has an ongoing sewer system evaluation plan which has TV'd more than 80,000 linear feet of sewer pipe and performed about 800 house and business inspections within the target area. Target areas for illicit connections were older parts of Town, and subdivisions built prior to DPW inspection. The house to house surveys revealed several potential drain to sewer connections but no sewer to drain. Suspect outfalls have no illicit discharges found to date. Trained Inspector	Continue to inspect outfalls. Develop goals for plan to eliminate discharge found when they are found. Town personnel with consultant will evaluate drain to sewer cross connections in summer 2011 and work with owners to remove. Begin inspections in accordance with illicit discharge detection and elimination plan (previous BMP)

5.3.4	Post removal evaluation and reporting	Implement a program to evaluate and report on conditions after illicit connections have been removed	DPW	Annual Report	No illicit discharges found to date.	Will provide report on post removal evaluation if illicit discharges are found.
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CONSTRUCTION SITE RUNOFF CONTROL

ID	BMP CATEGORY	BMP	DEP. RESP. FOR IMPLEMENTING BMP	MEASURABLE GOALS	PROGRESS ON GOAL(S) PERMIT YEAR 8	PLANNED ACTIVITIES
5.4.1	Regulatory Mechanism	Develop and implement a bylaw regulating erosion and sediment control for construction sites utilizing appropriate BMPs	DPW and Planning Department	Formation of a technical committee and annual review of program. Development of a bylaw	Completed. Bylaw adopted in Year 6. Bylaw implemented by issuing Stormwater Permits.	Continue to implement Bylaw and review.
5.4.2	Site Plan Review Procedures	Implement pre-construction review of storm water control plan for proposed construction site	DPW and Planning Department	Identify and train staff Review each project	Completed. Plans reviewed for site runoff control. 15 projects permitted in 2010 with local Stormwater Pollution and Prevention Plans	Continue Plan Review and requiring local control and reporting
5.4.3	Site Inspection and Enforcement Procedures	Conduct construction site inspections Develop a procedure for handling reports of non-compliance	DPW DPW	Identify and train staff. Review each project Development of procedure	Completed. Trained staff to perform regular inspections of construction sites Completed. Enforcement included in Stormwater Bylaw	Continue Inspection Continue to implement procedure

POST-CONSTRUCTION RUNOFF CONTROL

ID	BMP CATEGORY IN NOTICE OF INTENT (NOI)	BMP	DEPARTMENT RESPONSIBLE FOR IMPLEMENTING BMP	MEASURABLE GOALS	PROGRESS ON GOAL(S) PERMIT YEAR 8	PLANNED ACTIVITIES
5.5.1	Regulatory Mechanism	Develop and implement a bylaw regulating controls for post construction runoff utilizing appropriate BMPs	DPW and Planning Department	Formation of a technical committee and annual review of program. Development of a bylaw	Completed. Stormwater Bylaw with provisions for post-construction runoff implemented in Year 6.	Continue to implement bylaw
5.5.2	Plan Review of BMP Designs	Implement preconstruction review of BMPs for conformance with regulations	DPW and Planning Department	Identify and train staff. Review each project	Completed. Staff trained. 15 plans reviewed in 2010.	Continue to Review Plans
5.5.3	Site Inspection/Enforcement Procedures	During construction, inspect for assurance that BMPs are compliant	DPW	Identify and train staff. Inspect each project.	Completed. Staff trained. Construction projects inspected on a regular basis.	Continue to enforce bylaw and procedures
5.5.4	Operation and Maintenance Procedures for Structural BMPs	Develop operation and maintenance procedures for structural BMPs	DPW	Development of procedure	Completed. Operation and Maintenance Plans have been required for all BMPs	Continue to enforce

POLLUTION PREVENTION/GOOD HOUSEKEEPING

ID	BMP CATEGORY	BMP	DEPARTMENT RESPONSIBLE FOR IMPLEMENTING BMP	MEASURABLE GOALS	PROGRESS ON GOAL(S) PERMIT YEAR 8	PLANNED ACTIVITIES
5.6.1	Employee training Program	Implement employee training	DPW	Develop goals. Develop program. Annually conduct training	Employee training completed in Year 7. Training to new staff is continuous.	Continue developing training program
5.6.2	Stormwater System Operation and Maintenance	Enhance the existing storm sewer system and catch basin cleaning Structural BMP inspection and maintenance program	DPW DPW	Implement schedule. Strengthen record tracking. Clean all catch basins twice per year Develop and implement record keeping. Annually inspect and clean all BMPs once per year.	Completed. Records were kept for basin cleaning and culvert repairs. Several areas of the storm drain system were repaired and improved. Partially Completed. 75% of catch basins were cleaned last year. Problematic basins were cleaned after each rain storm.	Continue to maintain record keeping procedures. Continue to implement program. Clean more basins twice/yr and clean basins on mains which were not cleaned previous year.
5.6.3	Parks and Open Space	Develop and implement a management program for fertilizer and pesticide application	Parks Department	Annually summarize applications	Completed. Application of fertilizers and pesticides is analyzed every year and modified for the following year.	Continue to implement program

ID	BMP CATEGORY	BMP	DEPARTMENT RESPONSIBLE FOR IMPLEMENTING BMP	MEASURABLE GOALS	PROGRESS ON GOAL(S) PERMIT YEAR 8	PLANNED ACTIVITIES
5.6.4	Municipal Vehicle Maintenance and Repair	Review maintenance and repair programs for municipal vehicles	DPW	Review every two years	Completed. Potential for stormwater pollution is prevented by proper use of spill collection devices that are continuously being utilized, then replenished.	Continue to evaluate operations and make improvements
5.6.5	Municipal Roads	Enhance street sweeping operations	DPW	Strengthen record tracking system. Evaluate increasing frequency in urban areas. If applicable, increase frequency.	Completed. Evaluated record keeping and modified as necessary. 100% of streets swept in spring and fall and downtown area swept every other week.	Continue to evaluate and strengthen record keeping and continue street sweeping program.