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

Annual Report

FOR

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

YEAR 9



Department of Public Works

John M. Walden, Manager

April 26, 2012

NPDES PII Small MS4 General Permit
Annual Report – Year 9

Table of Contents

MA DEP Transmittal Form for Permit Application

Certification Signature Page

Part 1: General Information

- 1.0 Introduction and Background
- 2.0 Self–Assessment Review of Compliance with the Permit Conditions
- 3.0 Assessment of the Appropriateness of the selected BMPS
- 4.0 List of Activities for the Next Reporting Cycle
- 5.0 Table 1 - Best Management Practices
 - 5.1 Public Education and Outreach
 - 5.2 Public Participation and Involvement
 - 5.3 Illicit Discharge Detection and Elimination
 - 5.4 Construction Site Runoff Control
 - 5.5 Post-Construction Runoff Control
 - 5.6 Pollution Prevention/Good Housekeeping

Part 2: Appendix

- 1. Photos of stormwater displays around town
- 2. Copy of the cable TV ad
- 3. Stormwater Presentation to the Third graders in town
- 4. Copy of Rain Barrel Program
- 5. Earth Day Clean-up Ad
- 6. Girl Scout involvement in the Stormwater Program
- 7. Revised Map of Drainage Components
- 8. Catch Basin inventory project
- 9. Sewer System Evaluation Study: Inflow Summary Data
- 10. Current Stormwater Permit
- 11. Copy of memo by Conservation Agent + pamphlet to businesses
- 12. Detention Basin Maintenance Log
- 13. Lawn Maintenance Program



Enter your transmittal number

X251294

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 9

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:

Emery

Leigh

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:

- 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.
- Hardship Request - payment extensions according to 310 CMR 4.04(3)(c).
- Alternative Schedule Project (according to 310 CMR 4.05 and 4.10).
- 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: X251294

Annual Report No & Report Period: No. 8- March 2011-March 2012

NPDES PII Small MS4 General Permit

Annual Report

Part I. General Information:

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

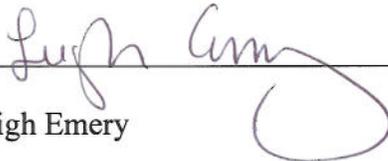
Telephone #: (508) 366-3070

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: Leigh Emery

Title: Chairman, Board of Selectmen

Date: April 26, 2012

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, year 7 on April 27, 2010, and year 8 on April 19, 2011. The original permit was intended to cover a five year period; however, it is now entering its tenth 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 9 – Ending March 2012

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. Past outreach materials were used again this year.
- Educational posters and post cards have been displayed around town.
 - a. Sewer vs. Drain display and Stormwater display with handouts were at the Annual Town Meeting in mid-May, 2011 and Fall Town Meeting in mid-October, 2011 and Annual Town Meeting on March 17, 2012.
 - b. A Stormwater Display was shown at the Library for the month of May 2011.
 - c. The Senior Center:
 - i. Had a special Earth Day stormwater display on April 22, 2011.
 - ii. They also had a “Green Day” on April 26, 2011. Information about stormwater and other various pollutants was displayed. Ms. Leslie Reichert, author of “The Joy of Green Cleaning” came to share some of her recipes from her book. The Board of Health had a “Mercury Recovery” display.
 - iii. The Stormwater information was displayed for the month of May 2011.
 - d. 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 September, 2011 and April, 2012. (see **Appendix 2**)
- The Town’s website has a section for Stormwater Information. There is a new video showing how a catch basin gets cleaned out. This is a great tool to educate others on catch basin maintenance. This video is also being used in classrooms and other various educational workshops. Visit:
 - a. (<http://www.town.westborough.ma.us/Public Documents/WestboroughMA DPW/Stormwater%20Information/>)
- The Junior Civil Engineer gave Stormwater presentations to third grade classes in town: (see attached lesson **Appendix 3**)
 - a. On March 2, 2012, stormwater presentation to 20 Third Grade Students at the Armstrong School.
 - b. On March 22, 2012, stormwater presentation to 40 Third Grade Students at the Fales School.
 - c. On March 28, 2012, stormwater presentation to 40 Third Grade Students at the Fales School.

- 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 4**)
- The Town of Westborough Community Land Trust organizes a "Town Wide Earth Day Clean-Up" every year. Volunteers of all ages came together to pick up litter from around our lakes, streams and streets. (See **Appendix 5**)
- Girl Scouts:
 - a. On Nov. 16, 2011, the Jr. Civil Engineer spoke to approximately 30 of the Westborough Girl Scout leaders about the Town of Westborough Stormwater Educational Program and gave them many ideas for activities and projects that they could have the Girl Scouts participate in. (**letter included in Appendix 6**)
 - b. On Dec. 15, 2011, The Jr. Civil Engineer gave a stormwater presentation to 10 Brownies in 3rd grade. At the end of the presentation they each created a poster showing what they learned and how it is important to keep stormwater clean. These posters were displayed at schools around town. (**lesson included in Appendix 6**)
 - c. In early February, *The Westborough Newspaper* published an article about the Town's involvement with educating the girl scout troops and getting them involved with educating the public on stormwater pollution prevention. (**Article included in Appendix 6**)
 - d. In March, 2012, the Brownies planned a Public Service Announcement with Westborough TV to inform the community of this important issue of Stormwater Pollution. This PSA will air on cable TV and be used in the future. It will also be available on the Westborough website. (**script included in Appendix 6**)
 - e. **See Appendix 6 for all Girl Scout involvement in the Stormwater Program**
- In January, 2012, a Boy Scout organized a project where he will have groups of volunteers stencil approximately 150 catch basins for his Eagle Scout Project. He is scheduled to perform the stenciling in April 2012.

Illicit Discharge Detection and Elimination

- The Town will continuously update the Drainage Map with new structures and complete the mapping of all drain pipes. In the last year, 2,804 point features (catch basins, manholes, etc.) have been added to the GIS map. The vast majorities are state and private catch basins picked up from a flyover done by Sewall Inc. in 2009; however, there were still plenty that were added from DPW as-built plans. There were also 354 line features (culverts and drain pipes) added since last year's report. (**see Appendix 7**)
- In January, 2012, the Highway Department started planning a town-wide survey of all catch basins. They started implementing their plan in early February, 2012. The properties of each catch basin in town will be evaluated, inspected and recorded on a field data sheet. This includes looking for illicit connection indicators. This also includes a rough measurement of the amount of silt in each

basin. The data will then get transferred to our GIS system. The procedure is as follows: The Town was divided into grid sections. Each grid has a smaller map showing details of the stormwater system. Each catch basin has its own corresponding field data sheet. As the catch basins are inspected, the map and data sheet are updated and filled out. (see **Appendix 8 for samples**)

- Sewer System Evaluation Study (SSES): The DPW continues through contract with AECOM to perform work on its \$463,000 SSES program. The object of this study is to identify sources of Inflow and Infiltration into the wastewater system. As noted in the Year 8 report, the results from the residential inside and outside inspections for illicit connections were furnished on September 27, 2011. The survey results for 695 residences show approximately 3% of the residences with potentially improper internal connections and 25% of the residences with potentially improper external connections. Additional dye testing/camera work/inspection must be performed to verify and refine these possibilities. DPW is working with AECOM to allocate the remaining \$80,000 in funds between this investigation and inspection of its interceptor from the downtown area to the WWTP which was constructed in 1968. (See **Appendix 9**)
- In addition to the consultant managed SSES study, DPW performed its own investigation and repair of infiltration to the wastewater system. Three locations in town were identified and repaired while another area was investigated and found to have no issues. Two more areas remain under investigation. One area is under state control (Lyman School) and is scheduled for repair in 2012. Another area is in the vicinity of 165 Flanders Road where sulfide gas has caused serious pipe deterioration and a source of infiltration is present at a river crossing. This area will be repaired when funds are obtained in 2012 or 2013. It should be noted that all issues discussed are clean water entering the wastewater system. No investigation or observation has revealed any illicit wastewater connection to the Municipal Storm Drainage System.

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 10**)

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 attached. (see **Appendix 11**)

Good Housekeeping

- The Town's Assistant Conservation Officer is continuously working with the DPW on the Town's detention basins and all other municipally owned properties to make sure that all municipally owned detention basins are cleaned once a year. The School Department contracts annually to have all the stormwater structures professionally maintained. (see **Appendix 12**)
- Management of Pesticides and Fertilizer application is monitored each year. (see **Appendix 13**)
- Highway Operations :
 - 50% of catch basins were cleaned. Equipment failures made it troublesome to achieve goal of 100%. Problematic basins cleaned after every rain storm.
 - Approximately 27 Catch basins repaired in 2011.
 - Drainage improvements done on Hundreds Rd. Wheeler Rd. and W. Main Street.
 - All streets are swept in the spring and fall. Downtown is swept every Friday 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. Anticipation of a new NPDES MS4 permit has caused us to improve our current Stormwater Management Program, so that when the revised permit is issued, we will have a head start.

4.0 LIST OF ACTIVITIES FOR THE NEXT REPORTING CYCLE

1. The Town will continue to air the stormwater video on cable TV.
 - A new video from SUASCO is anticipated to be aired in the fall.
 - The PSA by the Girl Scouts will be aired throughout the year.
2. New educational material from SUASCO will be displayed:
 - Town Hall will have a special display
 - Stormwater display will be at Town Meeting
 - Sewer vs. Drain display
 - 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 Boy Scouts and 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. This includes adding information from the Catch basin field data sheets that are collected by the Highway Department.
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 Highway Department will continue collecting data on all the catch basins in town and searching for illicit connections.
13. 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 nine. 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 9	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 March 2012, the Junior Civil Engineer gave a lesson to Third Grade students on stormwater pollution.	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 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 9	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, and Town Meetings. 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. Girl Scouts made posters to educate others on stormwater pollution. Completed in Year 8.	Repeat as availability occurs. Repeat 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. Boy Scouts will be stenciling CBs in April 2012.
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 9	PLANNED ACTIVITIES
5.3.1	Stormwater system mapping	Map outfalls Map pipes manholes and catch basins Map structural BMPs (i.e. detention basins, water quality inlets, etc)	DPW DPW DPW	Prioritize outfalls. Percentage of total outfalls mapped per year Prioritize areas. Percentage of total system Percentage of total structures	100% of known municipal outfalls mapped in GIS Pipes are being added to the GIS map We have a Senior Citizen Volunteer who is working on this. 100% of known municipal detention basins mapped in GIS	Complete GPS location of outfalls as they become available Complete location of structures and pipes. Complete mapping of system. Update map as new BMPs are constructed
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 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

ILLCIT DISCHARGE DETECTION AND ELIMINATION

ID	BMP CATEGORY	BMP	DEP. RESPONSIBLE FOR IMPLEMENTING BMP	MEASURABLE GOALS	PROGRESS ON GOAL(S) PERMIT YEAR 9	PLANNED ACTIVITIES
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 completed about 80,000 linear feet of TV sewer inspection of the sewer system and about 700 residential house inspections. The residential inspections identified about 3% of inside connections and 25% of outside connections which have potential inflow and will require further investigation. Also, a portion of remaining funds will be used to camera the 40+ year old interceptor from downtown to WWTP. In addition, \$70,000 was allocated at the March 2012 ATM for a drainage study which will start TV work on the drainage system. The priority will be to evaluate corrugated metal pipe, however, illicit discharges will also be identified. The Highway Dept. is inspecting all catch basins in town.	Continue to inspect outfalls. Complete investigation of suspected residential inflow from drain to sewer. Start drainage system evaluation which will yield an opportunity to view any potential sewer to drain illicit connections. Continue until all catch basins are inspected.
5.3.4	Post removal evaluation and reporting	Implement a program to eval. and report on cond. after illicit conn. Removed.	DPW	Annual Report	No illicit discharges found to date.	Will provide report on post removal evaluation if illicit discharges are found.

CONSTRUCTION SITE RUNOFF CONTROL

ID	BMP CATEGORY	BMP	DEP. RESP. FOR IMPLEMENTING BMP	MEASURABLE GOALS	PROGRESS ON GOAL(S) PERMIT YEAR 9	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. 10 projects permitted in 2011 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 9	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. 10 plans reviewed in 2011.	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 9	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. New CB data collection program started by Highway Department. Partially Completed. 50% of catch basins were cleaned last year. Equipment failures made it troublesome to achieve goal of 100%. 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 9	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 Friday.	Continue to evaluate and strengthen record keeping and continue street sweeping program.