



# TOWN OF DOUGLAS

Timothy P. Bonin, *Chairman*  
Michael D. Hughes, *Vice Chair*  
Mitchell S. Cohen  
Harold R. Davis  
Jeffrey D. LaPorte

## OFFICE OF THE SELECTMEN

29 Depot Street • Douglas, MA 01516

508-476-4000

Fax: 508-476-4012

TTY 508-476-1619

Michael J. Guzinski  
Town Administrator

Suzanne L. Kane  
Administrative Assistant

April 30, 2012

Glenda Velez  
US EPA – CIP  
One Congress Street – Suite 1100  
Boston, MA 02114

**Certified Mail: 7009 3410 0002 1182 6455**

**RE: EPA NPDES Permit #MAR041106**  
**Stormwater General Permit Notice of Intent for Discharges from Small**  
**Municipal Separate Storm Sewers (MS4s)**

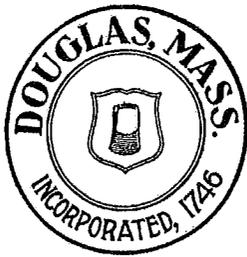
Dear Reviewer:

Enclosed, please find the seventh annual report for the above referenced permit. The Town of Douglas is pleased to work with the Department of Environmental Protection and the Environmental Protection Agency in preserving our natural resources. If there are any issues or questions pertaining to this permit application submittal, do not hesitate to contact our Town Engineer – William Cundiff, at 508-476-4000 ext. 108 to discuss. Thank you for your time and we look forward to working with you on this important project.

Respectfully,

Michael J. Guzinski  
Executive Administrator

cc: William Cundiff  
Department of Environmental Protection



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Michael J. Guzinski  
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Administrative Assistant

April 30, 2012

Fred Civian  
Department of Environmental Protection  
One Winter Street  
Boston, MA 02108

**Certified Mail: 7009 3410 0002 1182 6479**

**RE: BRP WM 08A: NPDES Stormwater General Permit – Douglas, MA  
Notice of Intent for Discharges from Small Municipal Separate Storm Sewers  
(MS4s)**

Dear Reviewer:

Enclosed, please find the seventh annual report for the above referenced permit. The Town of Douglas is please to work with the Department of Environmental Protection and the Environmental Protection Agency in preserving our natural resources. If there are any issues or questions pertaining to this permit application submittal, do not hesitate to contact our Town Engineer – William Cundiff, at 508-476-4000 ext. 108 to discuss. Thank you for your time and we look forward to working with you on this important project.

Respectfully,

Michael J. Guzinski  
Executive Administrator

cc: William Cundiff  
United States Environmental Protection Agency

**Municipality/Organization:** Town of Douglas, MA

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**EPA NPDES Permit Number:** MAR041106

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**MassDEP Transmittal Number:** W-040641

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**Annual Report Number & Reporting Period:** Year 10  
April 1, 2012 – March 31, 2013

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## NPDES PII Small MS4 General Permit Annual Report (Due: May 1, 2013)

### Part I. General Information

**Contact Person:** William J. Cundiff, P.E. **Title:** Town Engineer

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**Telephone #:** 508-476-4000 x108 **Email:** WCundiff@Douglasma.org

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**Mailing Address:** 29 Depot Street, Douglas, MA 01516

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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:** 

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**Printed Name:** Michael J. Guzinski

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**Title:** Town Administrator

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**Date:** April 25, 2013

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## **Part II. Self-Assessment**

**The Town of Douglas has completed the required self-assessment and has determined that our municipality is in compliance with all the permit conditions. However, a more active plan for Illicit Discharge Detection and Elimination (IDDE) seems to be warranted based upon observed fining patterns from the EPA, accordingly the Town of Douglas is reviewing our practices for IDDE compliance. Furthermore, a proposed stormwater bylaw was put forth at a previous annual town meeting and was overwhelmingly defeated. The local boards are revisiting this topic to make any necessary revisions in order to provide a compliant draft that will pass Town Meeting, if necessary. A review of existing bylaws indicates that the Town may already have adequate protections in place that comply with the NPDES requirements, a more specific and detailed review is underway by the Planning Board and Conservation Commission.**

**Part III. Summary of Minimum Control Measures**

**1. Public Education and Outreach**

<b>BMP ID #</b>	<b>BMP Description</b>	<b>Responsible Dept./Person Name</b>	<b>Measurable Goal(s)</b>	<b>Progress on Goal(s) – Permit Year 8 (Reliance on non-municipal partners indicated, if any)</b>	<b>Planned Activities</b>
2.1	Lawn & Garden Activities	Community Development / Wm. Cundiff	Cable Advertisements & Internet	Cable Advertisements have been running.	Developing the internet information and continuing with the Cable Advertisements.
2.2	Household Hazardous Waste	Community Development / Wm. Cundiff	Cable Advertisements & Internet	Cable Advertisements have been running.	Developing the internet information and continuing with the Cable Advertisements.
2.3	Pet Waste Management	Community Development / Wm. Cundiff	Cable Advertisements & Internet	Cable Advertisements have been running.	Developing the internet information and continuing with the Cable Advertisements.
2.4	Trash Management	Conservation Commission / Wm. Cundiff	Cable Advertisements & Internet	Cable Advertisements have been running.	Developing the internet information and continuing with the Cable Advertisements.
2.5	Classroom Education	School Dept. / Nancy Lane	Number of Classes	Nothing completed this past year.	Planning and evaluating how to incorporate classroom education.
2.6	Stormwater Education Materials	Community Development / Wm. Cundiff	Cable Advertisements & Internet	Cable Advertisements have been running.	Developing the internet information and continuing with the Cable Advertisements.

**1a. Additions**


**2. Public Involvement and Participation**

<b>BMP ID #</b>	<b>BMP Description</b>	<b>Responsible Dept./Person Name</b>	<b>Measurable Goal(s)</b>	<b>Progress on Goal(s) – Permit Year 8</b> (Reliance on non-municipal partners indicated, if any)	<b>Planned Activities</b>
3.1	Storm Drain Stenciling	Highway Dept. / John Furno	No. of Storm Drains Stenciled	All catch basins in the vicinity of the downtown area have been stenciled (~150/as needed).	Maintain stenciling during catch basin cleaning, as needed.
3.2	Stream Cleanup & Monitoring	Conservation Commission / Wm. Cundiff	No. of Cleanup Events	The Conservation Commission held no stream clean-ups this year.	Maintaining a Stream Cleanup and monitoring program.
3.3	Adopt-A-Stream program	Conservation Commission / Wm. Cundiff	No. of Streams Adopted	No Streams have been adopted to date.	Implementation of an Adopt-A-Stream program.
3.4	Community Hotlines	Highway Dept. / John Furno	No. of Calls Received	No Calls Received this year.	Continue advertisements on cable and internet to let people know what department to call.

**2a. Additions**


**3. Illicit Discharge Detection and Elimination**

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 8 (Reliance on non-municipal partners indicated, if any)	Planned Activities
4.1	Storm Drain Stenciling	Highway Dept. / John Furno	No. of Storm Drains Stenciled	All catch basins in the vicinity of the downtown area have been stenciled (~20/as needed).	Maintain stenciling during catch basin cleaning, as needed.
4.2	Stream Cleanup & Monitoring	Conservation Commission / Wm. Cundiff	No. of Cleanup Events	The Conservation Commission held no stream clean-ups this year.	Maintaining a Stream Cleanup and monitoring program.
4.3	Adopt-A-Stream program	Conservation Commission / Wm. Cundiff	No. of Streams Adopted	No Streams have been adopted to date.	Implementation of an Adopt-A-Stream program.
4.4	Community Hotlines	Highway Dept. / John Furno	No. of Calls Received	No Calls Received this year.	Continue advertisements on cable and internet to let people know what department to call.

**3a. Additions**


**4. Construction Site Stormwater Runoff Control**

<b>BMP ID #</b>	<b>BMP Description</b>	<b>Responsible Dept./Person Name</b>	<b>Measurable Goal(s)</b>	<b>Progress on Goal(s) – Permit Year 8</b> (Reliance on non-municipal partners indicated, if any)	<b>Planned Activities</b>
5.1	Runoff Control	Community Development / Wm. Cundiff	Implementation of Requirements	Projects must meet various stormwater management controls and BMPs through existing local bylaw and state regulatory requirements.	Continue to monitor and meet the local bylaw & state regulatory requirements.
5.2	Erosion Control	Community Development / Wm. Cundiff	Implementation of Requirements	Projects must meet various stormwater management controls and BMPs through existing local bylaw and state regulatory requirements.	Continue to monitor and meet the local bylaw & state regulatory requirements.
5.3	Sediment Control	Community Development / Wm. Cundiff	Implementation of Requirements	Projects must meet various stormwater management controls and BMPs through existing local bylaw and state regulatory requirements.	Continue to monitor and meet the local bylaw & state regulatory requirements.
5.4	Good Housekeeping	Community Development / Wm. Cundiff	Implementation of Requirements	Projects must meet various stormwater management controls and BMPs through existing local bylaw and state regulatory requirements.	Continue to monitor and meet the local bylaw & state regulatory requirements.

**4a. Additions**


**5. Post-Construction Stormwater Management in New Development and Redevelopment**

<b>BMP ID #</b>	<b>BMP Description</b>	<b>Responsible Dept./Person Name</b>	<b>Measurable Goal(s)</b>	<b>Progress on Goal(s) – Permit Year 8</b> (Reliance on non-municipal partners indicated, if any)	<b>Planned Activities</b>
6.1	Structural BMPs	Community Development / Wm. Cundiff	Implementation of Requirements	Projects must meet various stormwater management controls and BMPs through existing local bylaw and state regulatory requirements.	Continue to monitor and meet the local bylaw & state regulatory requirements.
6.2	Non-Structural BMPs	Community Development / Wm. Cundiff	Implementation of Requirements	Projects must meet various stormwater management controls and BMPs through existing local bylaw and state regulatory requirements.	Continue to monitor and meet the local bylaw & state regulatory requirements.

**5a. Additions**


**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 8 (Reliance on non-municipal partners indicated, if any)	Planned Activities
7.1	Structural BMPs	Community Development / Wm. Cundiff	Implementation of Requirements	Projects must meet various stormwater management controls and BMPs through existing local bylaw and state regulatory requirements.	Continue to monitor and meet the local bylaw & state regulatory requirements.
7.2	Non-Structural BMPs	Community Development / Wm. Cundiff	Implementation of Requirements	Projects must meet various stormwater management controls and BMPs through existing local bylaw and state regulatory requirements.	Continue to monitor and meet the local bylaw & state regulatory requirements.

**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 8 (Reliance on non-municipal partners indicated, if any)	Planned Activities
8.1	Upgrade of WWTP	Sewer Dept. / Robert Sullivan	Completion of Construction	Construction of WWTP upgrade is presently completed.	None

**7a. Additions**


**7b. WLA Assessment**

**Part IV. Summary of Information Collected and Analyzed**

No data has been collected thusfar.

**Part V. Program Outputs & Accomplishments (OPTIONAL)**

(Since beginning of permit coverage unless specified otherwise by a \*\*, which indicates response is for period covering April 1, 2012 through March 31, 2013)

**Programmatic**

	(Preferred Units)	Response
Stormwater management position created/staffed	(y/n)	Y
Annual program budget/expenditures **	(\$)	\$0
Total program expenditures since beginning of permit coverage	(\$)	\$80,000
Funding mechanism(s) (General Fund, Enterprise, Utility, etc)		Capital Exp.

**Education, Involvement, and Training**

Estimated number of property owners reached by education program(s)	(# or %)	60%
Stormwater management committee established	(y/n)	N
Stream teams established or supported	(# or y/n)	Y
Shoreline clean-up participation or quantity of shoreline miles cleaned **	(y/n or mi.)	Y
Shoreline cleaned since beginning of permit coverage	(mi.)	2
Household Hazardous Waste Collection Days		
▪ days sponsored **	(#)	0
▪ community participation **	(# or %)	0
▪ material collected **	(tons or gal)	0
School curricula implemented	(y/n)	Y

## Legal/Regulatory

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

## Mapping and Illicit Discharges

	(Preferred Units)	Response
Outfall mapping complete	(%)	100%
Estimated or actual number of outfalls	(#)	81
System-Wide mapping complete (complete storm sewer infrastructure)	(%)	100%
Mapping method(s)		
▪ Paper/Mylar	(%)	0%
▪ CADD	(%)	0%
▪ GIS	(%)	100%
Outfalls inspected/screened **	(# or %)	0
Outfalls inspected/screened (Since beginning of permit coverage)	(# or %)	0
Illicit discharges identified **	(#)	0
Illicit discharges identified (Since beginning of permit coverage)	(#)	0
Illicit connections removed **	(#); and (est. gpd)	0
Illicit connections removed (Since beginning of permit coverage)	(#); and (est. gpd)	0
% of population on sewer	(%)	20%
% of population on septic systems	(%)	90%

### Construction

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

### Post-Development Stormwater Management

Estimated percentage of development/redevelopment projects adequately regulated for post-construction stormwater control	(%)	100%
Site inspections (for proper BMP installation & operation) completed **	(# or %)	0
BMP maintenance required through covenants, escrow, deed restrictions, etc.	(y/n)	No
Low-impact development (LID) practices permitted and encouraged	(y/n)	Yes

### Operations and Maintenance

Average frequency of catch basin cleaning (non-commercial/non-arterial streets) **	(times/yr)	1
Average frequency of catch basin cleaning (commercial/arterial or other critical streets) **	(times/yr)	1
Qty of structures cleaned **	(#)	725
Qty. of storm drain cleaned **	(%, LF or mi.)	360'
Qty. of screenings/debris removed from storm sewer infrastructure **	(lbs. or tons)	0
Disposal or use of screenings (landfill, POTW, compost, beneficial use, etc.) **	(location)	N/A

Basin Cleaning Costs		
• Annual budget/expenditure (labor & equipment)**	(\$)	\$0
• Hourly or per basin contract rate **	(\$/hr or \$ per basin)	N/A
• Disposal cost**	(\$)	N/A
Cleaning Equipment		
• Clam shell truck(s) owned/leased	(#)	0
• Vacuum truck(s) owned/leased	(#)	1
• Vacuum trucks specified in contracts	(y/n)	N/A
• % Structures cleaned with clam shells **	(%)	0
• % Structures cleaned with vactor **	(%)	100%

	(Preferred Units)	Response
Average frequency of street sweeping (non-commercial/non-arterial streets) **	(times/yr)	1
Average frequency of street sweeping (commercial/arterial or other critical streets) **	(times/yr)	1
Qty. of sand/debris collected by sweeping **	(lbs. or tons)	88 Tons
Disposal of sweepings (landfill, POTW, compost, beneficial use, etc.) **	(location)	Fill Locally
Annual Sweeping Costs		
• Annual budget/expenditure (labor & equipment)**	(\$)	\$11,560.00
• Hourly or lane mile contract rate **	(\$/hr. or ln mi.)	\$95.00/hr
• Disposal cost**	(\$)	0
Sweeping Equipment		
• Rotary brush street sweepers owned/leased	(#)	0
• Vacuum street sweepers owned/leased	(#)	0
• Vacuum street sweepers specified in contracts	(y/n)	0
• % Roads swept with rotary brush sweepers **	%	100%
• % Roads swept with vacuum sweepers **	%	0

Reduction (since beginning of permit coverage) in application on public land of:  
 ("N/A" = never used; "100%" = elimination)

▪ Fertilizers	(lbs. or %)	0
▪ Herbicides	(lbs. or %)	0
▪ Pesticides	(lbs. or %)	0
Integrated Pest Management (IPM) Practices Implemented	(y/n)	No

	(Preferred Units)	Response
Average Ratio of Anti-/De-Icing products used ** (also identify chemicals and ratios used in specific areas, e.g., water supply protection areas)	% NaCl % CaCl <sub>2</sub> % MgCl <sub>2</sub> % CMA % Kac % KCl % Sand	60% NaCl 40% Sand
Pre-wetting techniques utilized **	(y/n or %)	No
Manual control spreaders used **	(y/n or %)	Yes
Zero-velocity spreaders used **	(y/n or %)	No
Estimated net reduction or increase in typical year salt/chemical application rate	(±lbs/ln mi. or %)	0
Estimated net reduction or increase in typical year sand application rate **	(±lbs/ln mi. or %)	0
% of salt/chemical pile(s) covered in storage shed(s)	(%)	100%
Storage shed(s) in design or under construction	(y/n or #)	No
100% of salt/chemical pile(s) covered in storage shed(s) by May 2008	(y/n)	No

### Water Supply Protection

Storm water outfalls to public water supplies eliminated or relocated	# or y/n	N/A
Installed or planned treatment BMPs for public drinking water supplies and their protection areas	# or y/n	N/A
Treatment units induce infiltration within 500-feet of a wellhead protection area	# or y/n	N/A