

NPDES Phase II Small MS4 General Permit
Annual Report – Year 10

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 Rain Barrel Program
- 3. Girl Scout involvement in the Stormwater Program
- 4. Street Drain Stenciling program by the Eagle Scout
- 5. Revised Map of Drainage Components
- 6. Catch Basin inventory project
- 7. Stormwater Permits issued
- 8. Stormwater Permit Requirements document
- 9. Copy of memo by Conservation Agent
- 10. Detention Basin Maintenance Log
- 11. Fertilizer and Herbicide Application Records
- 12. Vehicle Maintenance Records
- 13. Presentation by CMRSWC



Enter your transmittal number

X255633

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
NPDES Phase II Permit Annual Report - Year 10

2. Name of Permit Category

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:

Johnson

Ian

2. Last Name of Individual

3. First Name of Individual

4. MI

Chariman, 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

Special Provisions:

1. 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).

DEP Use Only

Permit No:

Rec'd Date:

Reviewer:

Check Number

Dollar Amount

Date

Municipality/Organization: Town of Westborough

EPA NPDES Permit Number: MAR041173

MA DEP Transmittal Number: X255633

Annual Report No & Report Period: No. 10- March 2012-March 2013

NPDES Phase II 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: Ian Johnson

Title: Chairman, Board of Selectmen

Date: April 26, 2013

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, year 8 on April 19, 2011 and year 9 on April 26, 2012. The original permit was intended to cover a five year period; however, it is now entering its eleventh year. A draft permit was issued on Nov. 2010 with comments closing in March 2011. The response to the draft permit was so overwhelming that the EPA felt that a second draft permit would be warranted. The second draft permit is anticipated to be released for public comments in the next couple months. It is not known when the final new permit will be issued.

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

Permit Year 10 – Ending March 2013

Public Education and Outreach

- 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 and Fall Town Meeting.
 - b. A Stormwater Display was shown at the Library for the month of February, 2013.
 - c. The Senior Center:
 - The Stormwater information was displayed for a couple weeks in the middle of March 2013.
- (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 and April.
 - The Town's website has a section for Stormwater Information. There is a great video showing how a catch basin gets cleaned out. This is a fun 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/)**

Public Participation and Involvement

- 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 2**)
- 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.
- The Jr. Civil Engineer gave a stormwater lesson to Girl Scouts:
 - a. On February 7, 2013, approximately 15 Brownies in 3rd grade took a tour of the DPW, the trucks and salt shed. They also took what they learned from the stormwater presentation and, with the assistance of the Town's Engineers, are working on producing a video for cable TV which will educate the public on three principals:
 - Scoop the poop – animal waste is unhealthy to humans and gets into our drinking water supply.
 - Wash your car on the grass so that the soapy suds don't get into the catch basins.

- Don't litter – it's bad for the environment and can pollute stormwater.
- b. March 28, 2013, approximately 14 scouts in 5th grade took a tour of the DPW, the trucks and salt shed. The stormwater lesson included an EnviroScape demonstration. This topographical map helps to demonstrate erosion and stormwater pollution. The girl scouts loved it. It really helped to clarify these concepts.
(Lesson notes and photos are included in **Appendix 3**)
- In May, 2012, a Boy Scout organized a project where he had groups of volunteers stencil approximately 150 catch basins for his Eagle Scout Project. (See street drain stenciling program spreadsheet in **Appendix 4**)

Illicit Discharge Detection and Elimination

- The Town will continuously update the Drainage Map with new structures and complete the mapping of all drain pipes. The MIS and Engineering departments were short staffed in the last year which made it difficult to add drainage features to the Town's GIS. In the last year, 18 detention ponds were reclassified in the GIS map. The watershed sub-basins were updated to reflect the most recent delineation by the state. A program has been developed to build on our drainage mapping. See Section 4 for details. (see **Appendix 5**)
- In January, 2012, the Highway Department started planning a town-wide survey of all catch basins. They have been implementing their plan as time allows. The properties of each catch basin in town are being 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. Because of the relatively severe winter in 2012-2013, the DPW Highway Crews were not able to inventory additional catch basins. However, the Engineering Department is planning to enter the inventory in GIS with the help of Senior Volunteers in the spring of 2013. (see **Appendix 6 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. DPW, in conjunction with AECOM, has utilized most of the remaining funds for the investigation and inspection of its interceptor from the downtown area to the WWTP which was constructed in 1968. The cleaning and observations occurred in late September to early October of 2012. Some deterioration was found in the pipe. AECOM is working to summarize the results and submit a final report in the summer of 2013.
- In addition to the consultant managed SSES study, DPW has designed and bid a repair to the wastewater collection on Flanders Road. As reported, last year the collection system (Interceptor) at 165 Flanders was deteriorated and leaking. In mid-March a portion of pipe collapsed.

- Approximately 1200 ft of pipe and manholes will be replaced by pipe bursting and conventional trenching in the spring of 2013. This will include repairing a leak 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. Our report last year indicated that I/I repairs were going to be made at the Lyman School by others. Some work was performed however it is not known if or when this will be completed. 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

- The Town's Stormwater Bylaw requires all projects that disturb one acre or more to meet the Massachusetts Stormwater Management Standards including:
 - No increase in post-development peak rate of runoff
 - No increase in post-development peak volume of runoff
 - Recharging groundwater
 - Water Quality Volume
 - TSS Removal
 - 72-hour drawdown
 - No new stormwater conveyances
- 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 Prevention Plans. Construction inspections continue for all projects. (see **Appendix 7**)
- We found that many homeowners felt overwhelmed by the Town's Stormwater requirements. Therefore, in the fall of 2012, we developed a simple document titled "Stormwater Permit Requirements". For each small project (less than 5,000 square feet of disturbance) the DPW prepared a list of conditions that must be met by the owner. The purpose of the document is to help the owners, by streamlining the process. This also assures that all of the DPW's requirements are understood by the owner. It also makes it very clear to the inspector what was originally agreed upon during permitting. Signing this document makes them accountable for the stormwater management on their property without overcomplicating things. So far, it is well received. (see **Appendix 8**)

Post Construction Runoff Control

- All new development and redevelopment in town must design, construct and maintain stormwater management practices that improve upon the pre-development runoff conditions following construction. The post-construction rate and volume of discharges are not permitted to exceed the pre-development conditions. These goals are accomplished by use of infiltration and drainage system improvements.
- The Town requires the submittal of as-built plans before occupancy permits are issued. This provides the Town with the ability to assure that the project has been

built according to our regulations and that all permit requirements have been fulfilled appropriately.

- During the review process, a Stormwater Operations and Maintenance document must be prepared by the applicant and is reviewed by the Town. The document must include provisions for all aspects of maintaining the stormwater system with specific inspections and maintenance schedules. The Stormwater Bylaw gives the Town authority to perform corrective actions and recoup the costs from the owner/operator if necessary.
- The Town's Conservation Officer 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 Conservation Officer 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. **(see Appendix 9)**

Good Housekeeping

- The Town's Conservation Officer works 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 10)**
- Management of pesticides, herbicides and fertilizer application is monitored each year.
 - Herbicide is applied to control roadside vegetation. In 2012, 5.58 gallons of concentrated "Round-up Pro-Max Herbicide" was used. The list of streets is included in the appendix. **(see Appendix 11)**
- 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 26 catch basins and manholes repaired in 2012.
 - All streets are swept in the spring and fall. Downtown is swept every Friday in the summer.
 - Salt shed, vehicle maintenance bay and garage are cleaned once a year in February by Clean Harbors. These facilities have closed-system drains with oil/water separators.
- Municipal vehicles are on a regular maintenance schedule and are immediately repaired when needed. **(See Appendix 12 for vehicle maintenance records)**

Additional Development:

Westborough joined the Central Massachusetts Regional Stormwater Coalition (CMRSWC) which includes the towns of Paxton, Spencer, Leicester, Charlton,

Sturbridge, Dudley, Webster, Holden, West Boylston, Shrewsbury, Auburn, Millbury and Oxford.

The objectives of the group are to develop tools to comply with the MS4 Permit, prepare for increased regulation and expand regional participation. The CMRSWC was awarded \$115,000 through the State funded CIC Program to accomplish the following tasks:

1. Collaborative Education and training
2. Regionalized Data Management Systems
3. Standardized Policies and Procedures

The CMRSWC has completed 10 tasks:

1. Develop an Online Database for Data Management.
2. Develop an Integrated Stormwater Mapping System.
3. Develop a Sump Pump Discharge Policy
4. Develop a Stormwater Pollution Prevention Plan (SWPPP) template
5. Develop a Salt/Sand Application Decision Tree to reduce chloride loadings to surface water.
6. Create a Small Development Stormwater Best Management Practice Toolbox
7. Develop a Request for Proposals (RFP) for Consulting Services for outfall inspection, system mapping, water quality monitoring, and other stormwater management activities.
8. Develop a Methodology for the 13 Communities to reach a common benchmark. Standard Operating Procedures for activities such as construction site inspection, dry and wet weather outfall inspection, catch basin inspection and cleaning, and other stormwater activities.
9. Develop a Stormwater Training DVD/CD with modules to reach multiple audiences, including municipal officials, the general public, and municipal staff.
10. Develop an Educational Website.

The CMRSWC was anticipating a \$200,000 grant, and when they were awarded \$115,000, they needed to ask each town for an additional \$2,833 to fulfill all the goals set forth for the upcoming year. Westborough felt that the investment would be well worth the benefits that this group has to offer. (See **Appendix 13**)

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. The decision to join the CMRSWC allows the Town the opportunity to further improve our stormwater program while at the same time save money by sharing resources.

4.0 LIST OF ACTIVITIES FOR THE NEXT REPORTING CYCLE

1. The Town will continue to air the stormwater video on cable TV.
 - The PSA by the Girl Scouts will be aired throughout the year.
2. Educational material from SUASCO will be displayed:
 - 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 will work toward completing the mapping of all drain pipes. This includes:
 - Adding information from the catch basin field data sheets that are collected by the Highway Department.
 - Hiring interns to help add drain pipes to the Town's GIS
 - Investigating unknown drains
 - Inspecting and cataloging outfalls
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, and adjust if necessary.
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 as time and weather permit.
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 ten. 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 10	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 – Junior Civil Engineer gave stormwater lesson to several groups of girl scouts.	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 Officer 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
5.1.4 (new)						

PUBLIC PARTICIPATION AND INVOLVEMENT

ID	BMP CATEGORY	BMP	DEPARTMENT RESPONSIBLE FOR IMPLEMENTING BMP	MEASURABLE GOALS	PROGRESS ON GOAL PERMIT YEAR 10	PLANNED ACTIVITIES
5.2.1	Homeowners	Circulate stormwater traveling display	SuAsCo Council and DPW	Develop display Feature at 3 locations	Completed. Displayed posters at 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 educational video 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	Hold Summit if coordinated by SUASCO Repeat as Availability occurs.
5.2.3(new)	General Public	Catch Basin Stenciling	SuAsCo Council, Westborough Community Land Trust and DPW	Catch Basin Stenciling	Completed. Boy Scouts Stenciled another 150 catch basins in April 2012.	Repeat as Availability occurs.
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 10	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 The Engineering and MIS departments were short staffed in the last year, which made it difficult to add drain pipes to the GIS. 18 detention basins have been reclassified in the Town's GIS	Complete GPS location of outfalls as they become available Hiring interns to help complete mapping 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 10	PLANNED ACTIVITIES
5.3.3	Illicit Discharge Detection and Elimination Plan	<p>Identify areas likely to have illicit discharges</p> <p>Develop and implement a plan to detect and address illicit discharges</p> <p>Implement illicit discharge detection and elimination inspection</p>	<p>DPW</p> <p>DPW</p> <p>DPW</p>	<p>Develop record keeping.</p> <p>Prioritize outfalls.</p> <p>Percentage of outfalls inspected</p> <p>Plan Completion</p> <p>Identify and train inspection agents. Begin inspections</p>	<p>As reported last year, the 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. That investigation has not yet occurred. A portion of remaining funds were used to camera the 40+ year old interceptor from downtown to WWTP. The inspection did not reveal any problems other than some deterioration from hydrogen sulfide gas. The study has not started because of the heavy load of permitting and capital projects currently with the Engineering Department. Also as noted last year, \$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.</p>	<p>Continue to inspect outfalls.</p> <p>Complete investigation of suspected residential inflow from drain to sewer.</p> <p>Start drainage system evaluation which will yield an opportunity to view any potential sewer to drain illicit connections.</p>

ILLCIT DISCHARGE DETECTION AND ELIMINATION

ID	BMP CATEGORY	BMP	DEP. RESPONSIBLE FOR IMPLEMENTING BMP	MEASURABLE GOALS	PROGRESS ON GOAL(S) PERMIT YEAR 10	PLANNED ACTIVITIES
5.3.3 (cont.)				Identify and train inspection agents. Begin inspections	The Highway Dept. is inspecting all catch basins in town.	Continue until all catch basins are inspected.
5.3.4	Post removal evaluation and reporting	Implement a program to evaluate 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 10	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-constr. review of SW control plan for prop. construction site	DPW and Planning Department	Identify and train staff Review each project	Completed. Plans reviewed for site runoff control. 18 projects permitted in 2012 with local SWPPP.	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 10	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. 18 plans reviewed in 2012.	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 10	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 continues as time allows in the 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

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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.