

**Municipality/Organization:** Dracut, MA

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**EPA NPDES Permit Number:** MAR041194

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**MADEP Transmittal Number:** W035262

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**Annual Report Number  
& Reporting Period:** No. 11: April 1, 2013 – March 31, 2014

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## NPDES Phase II Small MS4 General Permit Annual Report

### Part I. General Information

Contact Person: Glen A. Edwards Title: Assistant Town Manager/Town Planner

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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: Glen A. Edwards

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Title: Assistant Town Manager/Town Planner

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Date: April 30, 2014

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**Part II. Self-Assessment**

The Town of Dracut has completed the required self assessment and has determined that our municipality is in compliance with all permit conditions.



**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 11 (Reliance on non-municipal partners indicated, if any)</b>	<b>Planned Activities – Permit Year Covering: April 1, 2014 to March 31, 2015</b>
1-1	Make Brochures Available at DPW and Public Libraries	DPW	Assess existing brochures and identify data gaps.	<p>EPA Brochures are posted to the Town's website and are available at the following Dracut locations (See Appendix A):</p> <ul style="list-style-type: none"> <li>■ Conservation office. (Town Hall Annex)</li> <li>■ Recreation office. (Town Hall Annex)</li> <li>■ Public library.</li> <li>■ Public Works office.</li> </ul> <p>Maintained stormwater information and requirements on the Town's website. (See Appendix A).</p> <p>Town's future sewer expansion program brochure to educate public was posted on to the Town's website (See Appendix A). On April 4, 2014 CDM gave a public presentation of the Contract 31sewer project. (See Appendix A).</p>	Continue to distribute brochures that are currently in use, and evaluate additional avenues for educating the public.

1. Public Education and Outreach (Cont'd)

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 11 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year Covering: April 1, 2014 to March 31, 2015
1-1a	Public Outreach regarding Pet Waste	DPW	Posting of Signage in Public Places	<p>Pet waste disposal stations where installed at Veterans Memorial Park and Dillon-McAnespie Park on Lakeview Avenue.</p> <p>Created signs promoting pick-up of pet waste as a public education piece (See Appendix B). Signs have been placed at the following Dracut locations:</p> <ul style="list-style-type: none"> <li>■ Town buildings.</li> <li>■ Public parks.</li> <li>■ Public recreational areas.</li> </ul>	Continue to post signs, and evaluate additional avenues for educating the public.
1-1b	Public Outreach regarding community cleanup.	DPW	Posting of Signage in Public Places and assist with activities promoting community cleanups.	<p>Signs have been placed at town parks and public buildings to remind people to pick up their debris.</p> <p>Assisted Garden Club with planning Earth Day and Arbor Day celebration on 4/13/13 at Veterans Memorial Park. A public notice about this event was added to the Town's website. (See Appendix C)</p> <p>Articles about the importance of preventing stormwater pollutions and using resources wisely have been added and updated on the Town's website. (See Appendix C)</p>	Continue to post signs, and evaluate additional avenues for educating the public.



1. Public Education and Outreach (Cont'd)

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 11 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year Covering: April 1, 2014 to March 31, 2015
1-2	Annual update of Stormwater Management Plan	DPW	Update of the SWMP in Annual Report and at Selectmen's meeting	An update of the SWMP was included in the 2013 Annual report and presented at the Selectman's meeting on 03/11/14. This meeting was televised live on the Town's local cable access channel, and re-aired on several occasions in the weeks that followed. The Storm Management Report 2014 and DPW Storm Water Activities 2013 Memo are included in Appendix D.	A yearly update of the SWMP will be presented at Selectman's meetings and will be made available to the public via the Town's local cable access channel.

## 2. Public Involvement and Participation

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 11 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year Covering: April 1, 2014 to March 31, 2015
2-1	Comply with State Public Notification Guidelines at MGL Chapter 39 Section 23B	Town Clerk	Notices posted in the Town Hall and current locations throughout permit term.	Notices for Town Meetings have continued to be posted in Town Hall (62 Arlington Street), on the calendar of the Town's website and at other appropriate locations within the Town.	Notices for Town Meetings will continue to be posted in Town Hall, on the Town's website and at other appropriate locations within the Town.
2-2	Hold Annual Household Hazardous Waste Day	DPW and Board of Health	Hazardous waste collection day to be held annually, and communicated to the public in advance.	Two household hazardous waste collection days were held jointly by the Town of Dracut and the City of Methuen in 2013. The first event was scheduled for 4/27/2013 in the Town of Dracut, but had to be rescheduled to 6/1/2014. The second was held in the City of Methuen on 10/26/2013.  For each event, information was distributed to the public in advance that listed what items were appropriate to bring. In addition to making flyers available at various municipal locations, these events were publicized in local newspapers and on the Town's website. The event fliers and Dracut's Board of Health hazardous waste information are included in Appendix E.	The Town plans to continue their future efforts to offer household hazardous waste collection day in the Spring each year. The Town also plans to continue their future partnering efforts with the City of Methuen to offer a second household hazardous waste collection day in the Fall of each year.
2-3	Stencil catch basins with "don't dump" message	DPW	Stencil catch basins during years 2 through 5.	The Town continued their catch basin stenciling program by stenciling the words "Don't Dump – Drains to Pond/Lake" next to 505 catch basins tributary to local ponds and lakes. (See Appendix D for DPW Storm Water Activities 2013 Memo)	The annual practice of catch basin stenciling will continue.

### 3. Illicit Discharge Detection and Elimination

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 11 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year Covering: April 1, 2014 to March 31, 2015
3-1	Map stormwater outfalls and receiving waters.	DPW	A GIS layer was added to the town's Geographic Information System (GIS) showing all outfalls by the end of the first permit year. Bylaw maintained and enforced throughout permit term.	This BMP was completed in Year 1.	This BMP was completed in Year 1. Update and maintain the Town's maps for Geographic Information System (GIS) drainage layer.
3-2	Enforce existing storm sewer bylaw	DPW and Board of Health		This bylaw has been maintained and enforced during this period. No illegal discharges were discovered this period.  The Board of Health received and investigated no complaint reported as an illegal discharge, as noted on memo dated February 19, 2014. (See Appendix F).	This bylaw will continue to be maintained and enforced.
3-3	Develop and implement a program to identify non-stormwater discharges to the MS4	DPW and Board of Health	Plan developed during first year of permit term and implemented in remainder of permit term.	Stormwater outfall inspection summary by year: <ul style="list-style-type: none"> <li>■ Year 1: 118 outfalls inspected.</li> <li>■ Year 2: 160 outfalls inspected.</li> <li>■ Year 3: 149 outfalls inspected.</li> </ul>	This BMP was completed in Year 3.



3. Illicit Discharge Detection and Elimination (Cont'd)

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 11 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year Covering: April 1, 2014 to March 31, 2015
3-4	Develop and implement a program to remove illicit discharges to the MS4	DPW and Board of Health	Plan developed during first year of permit term. Plan implemented and maintained during remainder of permit term.	As part of dry weather screening program detailed above, water quality field sampling identified 37 outfall locations that exhibited signs that illicit connections may be tributary to these outfalls. There were 23 outfalls that were designated as high priority. The remaining 14 were designated as low priority.  The Town did not perform outfall testing during this permit year.	The Town will continue to implement their Illicit Discharge Detection Elimination Program (IDDEP). Due to budget constraints the funding for the IDDEP has been reduced.
3-5	Continue to enforce bylaw requiring inspection of new construction for correct connection to sanitary sewer.	DPW and Board of Health	Bylaw maintained and enforced throughout permit term.	This bylaw has been maintained and enforced through Year 11.  The Town's plumbing and gas inspector found no illegal plumbing connections to any town drainage system with the new sewer connections. See March 21, 2014 Memo, Appendix G.	This bylaw will continue to be maintained and enforced.

#### 4. Construction Site Stormwater Runoff Control

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 11 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year Covering: April 1, 2014 to March 31, 2015
4-1	Continue to Apply Standard 8 of the Massachusetts Stormwater Policy to all Construction Projects within the Jurisdiction of the Conservation Commission	Conservation Commission	Standard 8 of the Massachusetts Stormwater Policy applied to all Construction Projects within the Jurisdiction of the Conservation Commission throughout permit term.	A building checklist had been developed previously to accompany the Building Permit, which includes an approval from the Conservation Commission indicating all permits are filed and appropriate erosion controls are proposed.	The Conservation Commission will continue to apply these Standards.
4-2	Develop and Present Bylaw to Require an Erosion and Sediment Control Plan, Waste Management Plan, and Plan Review for Sites Disturbing More Than One Acre	Town Planner, Conservation Agent, DPW Director	Draft bylaw during first year of permit term. Present bylaw in spring 2004, and each spring thereafter until passed.	When the regulations were brought before the Conservation Commission, on two separate occasions, the commission rejected the regulations on the grounds that they exceeded their jurisdiction. It was finally approved on 03/12/08. Since then the Town has been enforcing its new Erosion and Sediment Control regulations.  The Town continuous to partner with other communities in the Greater Lowell area thru the Northern Middlesex Council of Governments to address two regional stormwater projects: <i>Restoring the Merrimack River by Connecting Communities through Stormwater Education and the Northern Middlesex Stormwater Collaborative.</i>	The Planning Board will continue to enforce the new Erosion and Sediment Control regulations as part of their <i>Rules &amp; Regulations Governing the Subdivision of Land in Dracut, MA.</i>



4. Construction Site Stormwater Runoff Control (Cont'd)

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 11 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year Covering: April 1, 2014 to March 31, 2015
4-3	Develop Procedure for Receipt and Consideration of Public Comment	Conservation Commission	Procedure developed during first year of permit term and implemented throughout remaining permit term.	Town has provided opportunity for public comment through Town's website, Town Hall posting of public meetings, public participation in public meetings and hearings.	Public comment procedures will be maintained during the coming permit year.  If the Town is ultimately successful in creating a separate stormwater utility, a public commenting function could be added to permitting process.
4-4	Check Erosion Control Measures and Construction Material Management on Site Inspection	Conservation Commission	Develop checklist during first year of permit term. Site inspections updated during spring 2004. Updated site inspection procedure implemented throughout remaining permit term.	Conservation Commission staff served as site inspectors to check erosion control measures using the Town's <i>Sediment Control Checklist</i> (See Appendix H). Site inspections continued during this period.	Site inspections will continue to be performed during the coming permit year. Inspection procedures will be updated, as necessary and will be implemented accordingly.  If the Town eventually creates a separate stormwater utility, this entity would be responsible for site inspections as part of implementation and enforcement of the Erosion and Sediment Control regulations.

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

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 11 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year Covering: April 1, 2014 to March 31, 2015
5-1	Develop Bylaw to Apply Standards 2, 3, 4, 7 and 9 of the Massachusetts Stormwater Policy (MSP) to Entire Town.	Task Force (DPW, Engineering, and Conservation)	Develop a draft bylaw by the end of the first permit term. Present annually to Town Meeting until passed	Conservation Commission applies Standards of MSP to projects under their jurisdiction.	Conservation Commission will continue this practice during the coming permit year.
5-2	Specify a Stormwater BMP Manual	Task Force (DPW, Engineering, and Conservation)	Specify a stormwater BMP manual to be included in a draft bylaw by the end of the first permit year.	Reviewed three existing stormwater BMP manuals. Selected the <i>Massachusetts Erosion and Sediment Control Guidelines for Urban and Suburban Areas</i> .	This BMP was completed in Year 1.
5-3	Develop Bylaw to Ensure Long-Term Maintenance of Private Structural BMPs	Task Force (DPW, Engineering, and Conservation)	By the end of the first permit term, include provisions in the bylaw for long-term BMP maintenance. Present the draft bylaw annually to the Town Meeting until passed.	DPW inspected 102 Town-owned detention ponds during this period, and performed routine maintenance. Commercial landowners with privately-owned BMPs are required to post bonds to ensure perpetual maintenance of these BMPs. They are also required to submit annual reports on the condition/maintenance of their BMPs.	DPW will continue this practice during the coming permit year.
5-4	Develop Procedures to Ensure Existing Structural BMPs Are Adequately Preventing or Minimizing Impacts to Water Quality	Task Force (DPW, Engineering, and Conservation)	Create BMP inventory and maintenance plan.	Inventory of structural BMPs developed in Year 1 as part of GIS effort (BMP 3-1). DPW annual inspection of BMPs identifies need for necessary improvements. Forwarded to engineering for review.	BMP inventory will be maintained. Improvements to structural BMPs, identified during annual inspections, will be prioritized. DPW would then begin the process of implementing these improvements through their operating budget and capital plan.



## 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 11 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year Covering: April 1, 2014 to March 31, 2015
6-1	Identify Sensitive Receptors (such as wetlands, beaches, etc.) within the Town	Conservation Commission	During first year of permit term, develop the list and give select DPW staff a 30-minute training session about the location of sensitive receptors, and why special protection is needed.	List of Sensitive Receptors developed Year 1 and training completed.  The Town has prepared a fact sheet entitled, <i>What are Wetlands?</i> (See Appendix I). This fact sheet has been posted to the Town's website.	Staff will continue to be updated on locations of sensitive receptors and the importance of protection.
6-2	Continue Annual Catch Basin Cleaning Program	DPW	Continue current program each spring.	DPW retrofitted 14 existing catch basins with drainage hoods designed to retain floatable materials for removal during maintenance, and prevent them from being discharged to water bodies during surges in flow through the catch basin.  The Town did not perform catch basin cleaning this permit year. Catch basin cleaning is being performed on a two year cycle.	The Town will continue this program during the coming permit year.
6-3	Continue Annual Street Sweeping Program	DPW	Sweep streets in town annually each spring.	Annual street sweeping program conducted from April to July 2013. Street sweeping was performed on approximately 332 lane-miles of Town streets.	The Town will continue this program during the coming permit year.
6-4	Maintain Cover over Salt Storage Area	DPW	Continue program throughout permit term.	The Town hired LoDuca Associates to install new steel salt storage area cover in 2013.	This BMP was completed in Year 11.

6. Pollution Prevention and Good Housekeeping in Municipal Operations (Cont'd)

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 11 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year Covering: April 1, 2014 to March 31, 2015
6-5	Develop/Implement Employee Education Program	DPW	Four hours of training for relevant employees each year of the permit	Public works employees have taken general safety training during this permit term.  Public Works Employees attended Essex County Highway Association's Municipal Stormwater Fall Training on 10/15/2013.  Public Works Employees attended Northern Middlesex Stormwater Collaborative's municipal training seminar – Illicit Discharge Detection and Elimination / Good Housekeeping and Pollution Prevention on 3/31/2014.	The Town will continue to train all public works employees on the various BMPs of the SWMP.
6-6	Use Good Housekeeping Practices for Storing Hazardous Materials, Including Training	DPW	Begin inventory by the end of the first year of the permit term.	An inventory of all current hazardous materials used by the DPW was created in Year 1 and updated in Years 2 & 3.	DPW will continue to maintain and update hazardous material inventory.
6-7	Minimizing Chemicals in Park, Public Playing Field, and Landscape Maintenance	DPW	Continue to minimize the use of chemicals throughout permit term.	Maintenance records were kept for the amount of chemicals used throughout the permit term.	DPW will continue to minimize the use of chemicals and maintain records of chemical used.
6-8	Conduct DPW Site Assessment	DPW		Funds were secured in Year 2 to conduct an environmental site assessment of DPW yard to evaluate stormwater run-off and storage and control of materials.  The DPW has completed a site assessment for stormwater management and compliance at the DPW yard.	DPW has reviewed the recommendations from the report and has been implementing them through their operating budget and capital plan.



6. Pollution Prevention and Good Housekeeping in Municipal Operations (Cont'd)

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 11 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year Covering: April 1, 2014 to March 31, 2015
6-9	Attend Storm Water Management Training	Planning, Engineering		<p>Town Planner and Town Engineer attended EPA Storm Water Management training on 04/08/05.</p> <p>Town Engineer attended independently-certified, privately-sponsored training on 12/08/05 entitled, <i>Stormwater Management &amp; Financing Seminar</i>.</p> <p>Assistant Town Manager completed EPA Stormwater Program's webcast Series – <i>Assessing the Effectiveness of Your Municipal Stormwater Program</i> on 06/04/08.</p> <p>DPW Director, Town Engineer and Assistant Town Manager attended New England Chapter APWA and NHPWA 2008 Stormwater Workshop.</p> <p>Assistant Town Manager and Board of Health Director completed EPA Stormwater Program's webcast Series – <i>Illicit Discharge Detection and Elimination (IDDE) 301 – Finding and Fixing Illicit Discharges and Connections</i> on 09/30/09.</p> <p>DPW Director, Town Manager and Assistant Town Manager completed CDM sponsored - Stormwater Utility Seminar on 10/29/09.</p>	<p>This BMP was completed in Year 3.</p> <p>This BMP was completed in Year 6.</p> <p>This BMP was completed in Year 7.</p>

Assistant Town Manager attended EPA's - Stormwater EPA Rulemaking Webcast on 02/03/10.

Assistant Town Manager completed EPA Stormwater Program's webcast Series - Stormwater and TMDLs: Making the Connection - An Introductory Workshop for Phase II MS4 Permittees in Florida on 04/27/11.

Town Engineer attended EPA Mapping Water Infrastructure with GPS Workshop on 05/17/11.

Assistant Town Manager attended SuAsCo Council's Stormwater Conference - Municipal Funding Strategies for Stormwater Management on 12/13/2011.

Assistant Town Manager attended EPA's - 2012 Construction General Permit (CGP) Webinar on 03/21/12.

Town Engineer attended MADEP Source Water Protection Workshop: *Managing Stormwater for Water Supply Protection* on 11/01/12.

Town Engineer attended Baystate Roads Program Workshop: *Improving Stream Crossings* on 10/17/13.

Town Engineer attended seven Northern Middlesex Stormwater Collaborative Meetings and trainings throughout the permit year. The meetings developed the two regional stormwater projects.

This BMP was completed in Year 9.

This BMP was completed in Year 10.

This BMP was completed in Year 11.



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

As required under Article 29 of the Modified Final Judgment (1997), the Town is required to do monthly sampling at 28 catch basins and storm drains and 9 culverts and brooks to identify locations where fecal coliform contamination is present. Last sampling conducted from March 2004 to November 2004. With the Town's release from the Modified Final Judgment, the sampling requirements identified above were replaced with the outfall inspection program described under BMP #3-3.

During the summer season, the Board of Health conducts weekly sampling of all beaches around Long Pond, Fleur De Lis Beach, Lake Muscuppie, and Peters Pond.