

Municipality/Organization: Town of Ludlow

EPA NPDES Permit Number: MA041014

MaDEP Transmittal Number: W-036097

**Annual Report Number
& Reporting Period: No. 11: May 1, 2013-April 30, 2014**

NPDES Phase II Small MS4 General Permit Annual Report

Part I. General Information

Contact Person: James Goodreau

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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: _____



Printed Name: Thomas Haluch

Title: Chairman – Ludlow Board of Public Works

Date: April 8, 2014

Part II. Self-Assessment

The Town of Ludlow has completed the required self-assessment of compliance with the Phase II Stormwater Management Program. In accordance with the NPDES Phase II Stormwater requirements, the following topics were evaluated for the completion of the Annual Report

1. Compliance with the Phase II Permit Conditions
2. Appropriateness of the Selected BMPs
3. Progress Towards Achieving the Program's Measurable Goals
4. Results of Any Information that has been Collected and Analyzed
5. Activities for the Next Reporting Cycle
6. Changes in Identified BMPs or Measurable Goals

Regulatory Mechanisms

The Town of Ludlow adopted a General Stormwater Bylaw at the October 2005 Special Town Meeting. Article 18, amended at the October 2006 Special Town Meeting, Article 24. The Bylaw provides mechanisms that 1) prohibit non-allowable, non-stormwater discharges to MS4s; 2) require sediment and erosion control at construction sites; and 3) control post-construction stormwater runoff from development or redeveloped parcels. A copy of the adopted bylaw was provided in permit year IV annual report.

Public Education and Outreach

Since joining the Connecticut River Clean-Up Committee – Stormwater Subcommittee (CRCC-SC) in 2005, the Town of Ludlow has participated in a regional media marketing campaign to educate residents about stormwater. Attachment A of this report contains details of public education and outreach programs accomplished by the CRCC-SC and the Town of Ludlow. The attachment details activities completed during permit year XI.

Illicit Discharge Programs

As outlined in the Permit, the Town of Ludlow has completed its storm sewer system map (100%) in a GIS format and, as mentioned above, Ludlow adopted regulatory mechanisms to prohibit non-stormwater discharges to its MS4. The Town of Ludlow was successful in eliminating the last Combined Sewer Overflow in Town. This work was completed and the last overflow in Town was eliminated in 2010.

Outfall Mapping Requirement

The Town of Ludlow completed the outfall mapping requirement. The database was developed to allow for tracking the frequency of maintenance operations.

It should be noted that some portions of the Town of Ludlow MS4 is interconnected with the MS4 owned and operated by the Massachusetts Turnpike Authority. A total of eight (8) outfalls are located on property with limited access and have stormwater contributions from both the Town of Ludlow and MTA. Therefore, assessing and maintaining these outfalls cannot be accomplished without relying on the MTA.

Certification of Eligibility – Endangered Species Act (ESA) and National Historic Preservation Act (NHPA)

The Town of Ludlow complied with this requirement of the permit during permit year II and was detailed in the annual report.

Discharges into Water Quality Impaired Waters

According to the *Massachusetts Year 2004 Integrated List of Waters*, published by MassDEP, water bodies in Ludlow are categorized as the following: Category 2 Haviland Pond, Red Bridge Impoundment, and Springfield Reservoir; Category 3 Harris Pond and Murphy Pond; Category 4a Minnechoag Pond; and Category 5 Alden Pond and Chicopee River. In addition, the *2004 Integrated List of Waters* lists Minnechoag Pond as the only water body covered by a TMDL within Ludlow.

Discharges into Waters with Approved Total maximum Daily Load Allocations

The Town of Ludlow's MS4 discharges to Minnechoag Pond for which a TMDL has been approved. Ludlow had design plans completed for the reconstruction of a portion of the drainage system discharging to Minnechoag Pond. The drainage improvement project was constructed in concert with a roadway/intersection improvement project, both of which are being funded by the Commonwealth of Massachusetts. This project was completed including all punch list items in 2011.

Stressed Basins

According to the *Stressed Basins in Massachusetts* report published by the Massachusetts Water Resources Commission, the Town of Ludlow is located with in a Low Stress Basin. Therefore, the Town of Ludlow is not required to address the annual loss of recharge to groundwater. However, the Town of Ludlow requires development and redevelopment project to maximize groundwater recharge through the regulator mechanisms adopted by the Town Meeting.

Measurable Goals

As discussed above, most of Ludlow's original measurable goals were met prior to the end of permit year V and have maintained compliance each permit year.

Summary

The Town of Ludlow has nearly completed all activities as presented in the Original Notice of Intent for the implementation of Stormwater Management Program. Over the past five permit years, Ludlow has also added Best Management Practices that provide further resource protection.

The Town of Ludlow purchased a vacuum truck for the purposes of maintaining our MS4 and sanitary sewer system. This purchase will help to meet some BMPs outlined in the Town of Ludlow's Stormwater Management Plan.

The following projects were completed in 2013 that improved storm water quality.

1. Due to budget constraints the Lyon Street reconstruction project was moved back to 2014.

The following project with stormwater system improvements is scheduled for 2014.

1. Lyon Street reconstruction project.

This project will include the reconstruction of Lyon Street from Munsing Street to the Granby line and include the installation of a storm water system and deep sump catch basins.

Part III. Summary of Minimum Control Measures

1. Public Education and Outreach

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 12
1a.	Create website links	DPW	Post links to EPA & DEP stormwater information	Links to DEP and EPA Stormwater information posted on Town of Ludlow website and DPW website.	Update links as necessary and continue EPA and MA DEP stormwater information links.
1b.	Make Stormwater Management Plan available.	DPW	Have Plan copies available at Town Hall, Library & DPW	The plan is available.	Keep copies of the plan available & update as necessary.
1c.	Hold a household hazardous waste collection day.	DPW	One collection per year.	A household hazardous waste day was held in September 2013. 31 Ludlow Residents participated in a regional event in September.	A household hazardous waste collection day is scheduled for September 2014. Document # of participants.
1d.	Cable access bulletins.	DPW	Air bulletins each year.	Bulletins aired during the year with upcoming stormwater events.	Continue to run bulletins and update with upcoming stormwater related events.
1e.	Regional Public Outreach	DPW	Regional Multi-Media Campaign	See Attachment A "Connecticut River Stormwater Committee Progress Report Jan. 1 to Dec. 31, 2013	Continue participation in CRSS and document outreach materials distributed.

1a. Additions – No addition at this time

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 12
2a.	Form a stormwater committee.	Selectmen	Have meetings as necessary.	No meetings held	Continue to hold committee meetings as needed.
2b.	Develop stormwater bylaws.	Stormwater Committee	Public hearing held.	No public meetings held.	Hold public hearings, as needed, to revise/update general bylaw for future Annual Town Meeting.
2c.	Develop a catch basin stenciling program.	DPW	Number of catch basins selected.	Stenciling program developed. None stenciled due to budget constraints.	Continue stenciling program and recruit volunteers as funds allow
2d.	Town Meeting consideration of Bylaws.	Selectmen	Recorded vote of Town Meeting.	No revisions to Stormwater Management Bylaw adopted Article 18 October 2005 Special Town Meeting.	Revise/Update bylaw as necessary.

2a. Additions - No additions at this time

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 12
3a.	Draft a drainage system bylaw.	Stormwater Committee	Draft bylaw ready for Town Meeting in Year 2, Record Vote	Language added to existing Stormwater Management Bylaw governing penalties illicit discharge connections. Voted passed: Article 24 October 2006 Special Town Meeting	Revise/update bylaw as needed.
3b.	Map the MS4.	DPW	Completed map.	Map Completed. Continue field verification and inspection project. MTA reliance.	Continue map updates and outfall and receiving water inspections to identify high priority area.

3a. Additions No additions at this time

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 12
4a.	Develop construction site runoff control regulations.	Stormwater Committee	Interdepartmental policy in place	General Stormwater Bylaw adopted in October 2005 Special Town Meeting, Article 18. Encompasses development construction activities.	Revise/update bylaw to include more stringent enforcement options for violations.
4b.	Multi-Departmental Pre-Project Release Form	Building Department	Institute Multi-Department Release Form	Draft form adopted in October 2005. Use for every development project in Ludlow.	Revise/update development form as needed.
4c.	Pre-Construction Stormwater Permit	DPW	Record number of Permits Filed	Conducted 4 permit reviews and site inspections	Continue to review permits and site plans for adequate stormwater controls for any construction activity.

4a. Additions - No additions at this time

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 12
5a.	Adopt bylaw.	Stormwater Committee	Prepare for Town Meeting.	Revise General Stormwater Bylaw adopted in October 2005. Encompasses development construction activities.	Revise/update bylaw to include more stringent enforcement clauses for violations.
5b.	Detention/Retention/Infiltration Basin Inspections	DPW	Inspection Log	Developed maintenance plan of action to be accomplished. Due to budget constraints these inspections could not all occur.	Develop inspection program for all detention, retention, and infiltration basins to ensure proper function during future storm events.

5a. Additions - No additions at this time

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	Planned Activities - Permit Year 12
6a.	Clean catch basins.	DPW	Clean all catch basins once per year.	Critical Catch basins were cleaned due to budget constraints.	Clean as many catch basins as possible within the budget.
6b.	Sweep streets.	DPW	Sweep all streets.	All streets were swept.	All streets will be swept subject to funding.
6c.	Management Education	DPW	Remain up-to-date with current Stormwater policies and regulation.	Stormwater seminars attended by staff.	Attend Stormwater management classes and/or seminars.
6d.	Catch Basin Replacement	DPW	Document No. of Catch Basins Replaced	14 deep sump catch basins were installed,	Replace existing non deep sump, non-hooded catch basin with deep sump and hood catch basins throughout urbanized area.

6e.	Vacuum Truck	DPW	Purchase Vacuum Truck to Maintain MS4	The DPW utilize the Vacuum Truck to maintain the MS4	Utilize Vacuum Truck to maintain MS4 including cleaning drain lines and catch basins.
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6a. Additions - No additions at this time.

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 11 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 12
7.	Reconstruct drainage system to Minnechoag Pond from East Street.	DPW	Reduce sediment load reaching the pond from a major street via flow from a substantial discharge.	Construction was completed on this project.	The completion of the drainage system three construction seasons ago removed sediment/phosphorous loading to Minnechoag Pond.

7a. Additions - No additions at this time

Part IV. Summary of Information Collected and Analyzed

No significant amount of information has yet been collected.

Part V. Program Outputs & Accomplishments (OPTIONAL)

Programmatic

	(Preferred Units)	Response
Stormwater management position created/staffed	(y/n)	No
Annual program budget/expenditures **	(\$)	~120,000
Total program expenditures since beginning of permit coverage	(\$)	~993,000
Funding mechanism(s) (General Fund, Enterprise, Utility, etc)		General Fund

Education, Involvement, and Training

	(Preferred Units)	Response
Estimated number of property owners reached by education program(s)	(# or %)	~1500
Stormwater management committee established	(y/n)	Yes
Stream teams established or supported	(# or y/n)	No
Shoreline clean-up participation or quantity of shoreline miles cleaned **	(y/n or mi.)	Yes
Shoreline cleaned since beginning of permit coverage	(mi.)	0.25
Household Hazardous Waste Collection Days		
<ul style="list-style-type: none"> ▪ days sponsored ** ▪ community participation ** ▪ material collected ** 	(#) (# or %) (tons or gal)	1 31 households ~620gal
School curricula implemented	(y/n)	No

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
Accompanying Regulation Status (indicate with "X")					
▪ Illicit Discharge Detection & Elimination					X
▪ Erosion & Sediment Control					X
▪ Post-Development Stormwater Management					X

Construction

	(Preferred Units)	Response
Number of construction starts (>1-acre) **	(#) 4	100
Estimated percentage of construction starts adequately regulated for erosion and sediment control **	(%) 100	100
Site inspections completed **	(#) 0	0
Tickets/Stop work orders issued **	(# and \$) 0	0
Fines collected **	(#) 0	0
Complaints/concerns received from public **		

Post-Development Stormwater Management

	(Preferred Units)	Response
Estimated percentage of development/redevelopment projects adequately regulated for post-construction stormwater control	(%) 100	100
Site inspections (for proper BMP installation & operation) completed **	(%) 100	100
BMP maintenance required through covenants, escrow, deed restrictions, etc.	(y/n) Y	Y
Low-impact development (LID) practices permitted and encouraged	(y/n) Y	Y

Mapping and Illicit Discharges

	(Preferred Units)	Response
Outfall mapping complete	(%)	100 paper 100 electronic
Estimated or actual number of outfalls	(#)	310
System-Wide mapping complete (complete storm sewer infrastructure)	(%)	100
Mapping method(s)		
▪ Paper/Mylar	(%)	100
▪ 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	(%)	60
% of population on septic systems	(%)	40

Operations and Maintenance

Average frequency of catch basin cleaning (non-commercial/non-arterial streets) **	(times/yr)	~1 (as budget
Average frequency of catch basin cleaning (commercial/arterial or other critical streets) **	(times/yr)	1 allows)
Qty of structures cleaned **	(#)	~50
Qty. of storm drain cleaned **	(%, LF, mi.)	0 lf
Qty. of screenings/debris removed from storm sewer infrastructure **	(lbs. or tons)	30 cy
Disposal or use of screenings (landfill, POTW, compost, beneficial use, etc.) **	(location)	Disposal
Basin Cleaning Costs		
• Annual budget/expenditure (labor & equipment)**	(\$)	\$100,000
• Hourly or per basin contract rate **	(\$/hr or \$ per basin)	\$300/hr
• Disposal cost**	(\$)	\$
Cleaning Equipment		
• Clam shell truck(s) owned/leased	(#)	0
• Vacuum truck(s) owned/leased	(#)	1
• Vacuum trucks specified in contracts	(y/n)	Yes
• % Structures cleaned with clam shells **	(%)	0
• % Structures cleaned with vacor **	(%)	50
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)	3
Qty. of sand/debris collected by sweeping **	(lbs. or tons)	300cy
Disposal of sweepings (landfill, POTW, compost, beneficial use, etc.) **	(location)	Compost
Annual Sweeping Costs		
• Annual budget/expenditure (labor & equipment)**	(\$)	~\$25,000
• Hourly or lane mile contract rate **	(\$/hr. ln mi.)	\$
• Disposal cost**	(\$)	
Sweeping Equipment		
• Rotary brush street sweepers owned/leased	(#)	1
• Vacuum street sweepers owned/leased	(#)	0
• Vacuum street sweepers specified in contracts	(y/n)	no

Operations and Maintenance (cont)

<ul style="list-style-type: none"> ● % Roads swept with rotary brush sweepers ** ● % Roads swept with vacuum sweepers ** 	%	100
<ul style="list-style-type: none"> ● % Roads swept with vacuum sweepers ** 	%	0
Reduction (since beginning of permit coverage) in application on public land of: ("N/A" = never used; "100%" = elimination)		
<ul style="list-style-type: none"> ■ Fertilizers ■ Herbicides ■ Pesticides 	(lbs. or %) (lbs. or %) (lbs. or %)	15% 15% 15%
Integrated Pest Management (IPM) Practices Implemented	(y/n)	Y
Average Ratio of Anti-/De-Icing products used **	% NaCl % CaCl ₂ % MgCl ₂ % CMA % Kac % KCl % Sand	95 5
(also identify chemicals and ratios used in specific areas, e.g., water supply protection areas)		
Pre-wetting techniques utilized **	(y/n or %)	Yes
Manual control spreaders used **	(y/n or %)	Yes
Zero-velocity spreaders used **	(y/n or %)	Yes
Estimated net reduction or increase in typical year salt/chemical application rate	(±lbs/ln mi. or %)	No change
Estimated net reduction or increase in typical year sand application rate **	(±lbs/ln mi. or %)	No change
% of salt/chemical pile(s) covered in storage shed(s)	(%)	100
Storage shed(s) in design or under construction	(y/n or #)	N
100% of salt/chemical pile(s) covered in storage shed(s) by May 2008	(y/n)	Yes

Water Supply Protection

Storm water outfalls to public water supplies eliminated or relocated	# or y/n	None
Installed or planned treatment BMPs for public drinking water supplies and their protection areas	# or y/n	None
<ul style="list-style-type: none"> Treatment units induce infiltration within 500-feet of a wellhead protection area 	# or y/n	None