

**Municipality/Organization:** Town of Bedford, Massachusetts  
**EPA NPDES Permit Number:** MAR 041028  
**MassDEP Transmittal Number:** W041280  
**Annual Report Number & Reporting Period:** Year 13  
April 1, 2015 – March 31, 2016


## NPDES PII Small MS4 General Permit Annual Report (Due: May 1, 2016)

### Part I. General Information

**Contact Person:** Adrienne St. John **Title:** Public Works Engineer  
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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:** Richard Reed  
**Title:** Town Manager  
**Date:** April 28, 2016

## Part II. Self-Assessment

The Town of Bedford continues to strive to achieve reduction in pollution from stormwater runoff through careful design of capital projects, comprehensive review of private projects, maintenance of existing infrastructure and education to the general public. The combined efforts of the Town's Department of Public Works, Conservation Commission, Health Department, Planning and Zoning Boards have provided a unified approach to mitigation of stormwater pollution and reduction of flooding in sensitive areas.

As part of developing this annual report, the Town evaluated compliance of its stormwater management program with the conditions of the 2003 *NPDES General Permit for Stormwater Discharges from Small MS4s*, as required by Part II.D.1 of the permit. During Permit Year 13, the Town continued to implement its stormwater management program and meet measurable goals of BMPs.

The Town also addresses pollution prevention with the annual distribution of pet waste disposal bags to residents and installation of solar powered trash receptacles at many public sites. Not only does this promote proper pet waste removal, but also provides convenient trash disposal in high use areas. The program has been found to reduce the occurrence of unwanted pet waste and eliminate loose paper and empty bottles from overflowing trash cans which had been blowing into adjacent resource areas. New in Year 13, the Town also distributed 1000 Post-It note pads incorporating the Stormwater Community Assistance Program's "Stormwater Matters" logo and displaying the message "Bedford's drains are just for rain!"

In accordance with Part II.D.2 of the permit, the Town also evaluated the appropriateness of all BMPs in efforts towards achieving the defined measurable goals. BMPs and measurable goals continue to be appropriate for the community.

In July of 2015, the Town obtained a Construction General Permit from EPA and completed a Stormwater Pollution Prevention Plan for roadway reclamation and stone dust refurbishment of a rail trail that disturbed greater than one acre of land. The paving project also provided a 2400 square foot reduction in impervious surface within the buffer zone to adjacent resource areas.

The Town is providing assistance to a volunteer group who is monitoring the habitat of the bridge shiner minnow in the Vine Brook in the eastern part of town. In Year 13, the Town purchased a Turbidity Tube and a multi-parameter waterproof tester to allow volunteers to monitor conductivity, pH and water clarity relative to the bridge shiner habitat.

In the fall of 2015, the Town installed a Universal Waste Shed for collection of mercury items. During regular business hours, residents are able to drop off items containing mercury, including fluorescent light bulbs, thermometers, and rechargeable batteries.

The Town of Bedford has also continued to require all new building construction to infiltrate stormwater runoff from roof areas to increase groundwater recharge and the Town's Stormwater Management Regulations incorporate this requirement as a standard practice.

The Town is aware that the new MS4 General Permit covering stormwater Phase II regulated discharges for Massachusetts has been issued and will become effective on July 1, 2017. Town staff will be attending the upcoming EPA/DEP informational meeting about the permit scheduled for May 19, 2016 in Haverhill at Northern Essex Community College.

## 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 13<br>(Reliance on non-municipal partners indicated, if any)  | Planned Activities  |
|-----------------|---|-------------------------------|---|---|---|
| 1-1<br>Revised  | Residential Flyer   | DPW/SuAsCo                    | Distribute to 75% of homes  | Measurable goal met in early part of permit and reiterated with second mailing in Year 9.   | Produce and distribute meaningful information to target audiences as required by new NPDES permit.  |
| 1-2<br>Revised  | Education Program   | DPW/SuAsCo                    | Teach in 1 5 <sup>th</sup> grade class  | The Town’s Recycling Coordinator continues to keep an open dialogue with all Bedford schools and assisted with various recycling efforts including locker clean out day.  | Reassess education programs for compliance with requirements of new NPDES permit and a possible pilot program to evaluate composting opportunities in the kitchen |
| 1-3<br>Revised  | Develop website   | DPW                           | Have in place by 7/05   | Website contains links to brochures, Town projects, federal programs, and helpful tips related to stormwater pollution prevention.  | Continue to add pertinent information and links.  |
| 1-4<br>Revised  | Stormwater flyer to businesses                                  | DPW/SuAsCo                    | Distribute to 50% of businesses   | Measurable goal previously met. See BMP ID 1-1.   | Continue public education as directed by new NPDES permit.  |
| 1-5<br>Revised  | Stormwater video  | DPW                           | Show video on local cable station.  | Measurable goal met with continued airing of the “Think Blue Massachusetts” Public Service Announcement Video on the local cable channel.   | Reassess value of showing stormwater videos for compliance with public education and outreach requirements of new NPDES permit.                                   |
| 1a-6<br>Revised | Pet Waste Dispensers<br><br><i>Pet Waste Disposal Education</i> | DPW                           | Distribute to 75% of local dog owners<br><br><i>Distribute to 75% of local dog owners; increase public awareness for proper pet waste disposal practices.</i> | Set up information booth at Bedford Day to give away 504 rolls of pet waste bags to use as refills in leash dispensers. Also gave away Post-it notepads displaying message “Bedford’s drains are just for rain!”<br>Town maintains information on Animal control bylaw on Town website. | Continue popular program.   |

## 1a. Additions

### 2. Public Involvement and Participation

| BMP ID #       | BMP Description            | Responsible Dept./Person Name         | Measurable Goal(s)                   | Progress on Goal(s) – Permit Year 13<br>(Reliance on non-municipal partners indicated, if any)  | Planned Activities  |
|----------------|----------------------------|---------------------------------------|--------------------------------------|---|---|
| 2-1<br>Revised | Stormwater Display         | DPW/SuAsCo                            | 3mos. at library, Town Hall, Schools | Measurable goals met in prior permit years. No measurable goals planned for Permit Year 13. Distributed SuAsCo stormwater cards for proper pet waste disposal at Bedford Day to promote good housekeeping habits to prevent pollution.  | Continue to mark catch basins and deliver door hangers to explain benefits of keeping stormwater clean.   |
| 2-2<br>Revised | Local Stormwater Committee | Selectmen, DPW, Cons. Comm., Planning | Form committee by 12/04              | DPW functions as core Stormwater Committee and communicates with other Town Boards and Commissions about stormwater as needed throughout the year.  | Gather additional stakeholders to work on finalizing the Town's Stormwater Management Regulations.  |
| 2-3<br>Revised | Stormwater meetings        | DPW/SW Committee                      | Meet 3x/year                         | Good communication between Conservation, Health, Planning and Code Enforcement to provide unified response to stormwater issues as needed.<br><br>Public meetings comply with the State's public notice requirements at MGL Chapter 39 Section 23B.                           | Coordinate public meetings to finalize and adopt the Town's Stormwater Management Regulations.  |
| 2-4<br>Revised | Attend Stormwater Summit   | SuAsCo/ SW Committee                  | Share information                    | No measurable goals planned for Permit Year 13. The intent of this BMP is being met by the Stormwater Committee's local coordination (BMPs 2-2 and 2-3). Town staff attended a workshop "Creating a Revenue Stream for Stormwater Management", which included an EPA speaker. | Assess value and need of BMP relative to EPA's new MS4 General Permit. Continue to attend stormwater meetings and trainings as staff time and budget allow. |

### 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 13<br>(Reliance on non-municipal partners indicated, if any)  | Planned Activities  |
|----------------|-------------------------------|-------------------------------|--|---|---|
| 3-1<br>Revised | Purchase GPS Equipment        | DPW                           | In place by 7/04                           | Original GPS equipment purchased in Permit Year 2, and replaced in Year 9. In Year 13, staff continued discussions with PeopleGIS to explore use of PeopleForms software on a tablet for existing outlet data collection.   | Following review of the new MS4 Permit, the tablet will be configured with appropriate templates to collect required field data for stormwater outlets. |
| 3-2<br>Revised | Map SW outlets                | DPW                           | 75% capture rate                           | The Town has previously developed a storm sewer system map in GIS. This map shows the locations of outfalls, receiving water bodies, catch basins, manholes, and pipe network. The Town has an ongoing effort to update the map.<br><br>In Permit Year 13, new outlets and stormwater systems were added to the GIS from recently approved subdivision plans. | Continue to GPS outlets and note condition of pipe and if any dry weather flow is present.  |
| 3-3<br>Revised | Identify critical resources   | DPW, Cons Comm                | Map, notify abutters, develop BMP          | The Town keeps track of identified critical resources and sensitive areas, such as vernal pools, priority habitats, well head protection areas, and areas of flooding. In addition, draft IDDE Plan includes priority areas, including areas of high environmental value, recreational value, and drinking water sources.                                     | Promote increased infiltration for all construction projects, where applicable including use of porous pavement and construction of more rain gardens.  |
| 3-4<br>Revised | Perform water quality testing | DPW                           | 3 sites-residential, municipal, commercial | No measurable goals were planned for permit Year 13. BMP completed in prior permit years.   | Revise BMP to address monitoring requirements included in new NPDES Permit.   |

| <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 13</b><br>(Reliance on non-municipal partners indicated, if any)  | <b>Planned Activities</b>  |
|-----------------|------------------------------------|--------------------------------------|--|--|--|
| 3-5<br>Revised  | Local bylaw-illicit discharges     | DPW/Selectmen, Planning              | Adopt bylaw                            | Town has previously adopted a Bylaw prohibiting non-stormwater discharges (illicit discharges and illegal dumping) to the drainage system. Bylaw includes appropriate enforcement procedures and actions.  | Establish corresponding regulations.   |
| 3a-6<br>Revised | Develop and implement an IDDE Plan | DPW                                  | Develop written plan<br>Implement plan | IDDE Plan was previously drafted to formalize process for detecting and addressing non-stormwater discharges, including illegal dumping, into the drainage system. Plan meets requirements of 2003 Phase II Small MS4 General Permit and includes components of proposed IDDE requirements of next General Permit. Plan also includes assessment of non-stormwater discharges. In Permit Year 13 Town Staff continued to review components of IDDE Plan. | Finalize IDDE Plan to incorporate applicable sections of the new MS4 Permit.<br><br>Continue IDDE activities |

### 3a. Additions

#### 4. Construction Site Stormwater Runoff Control

| BMP ID #       | BMP Description                                  | Responsible Dept./Person Name | Measurable Goal(s)                       | Progress on Goal(s) – Permit Year 12<br>(Reliance on non-municipal partners indicated, if any)   | Planned Activities   |
|----------------|--|-------------------------------|--|--|--|
| 4-1<br>Revised | Develop awareness of construction site issues    | DPW, Code, Cons Comm.         | Write guidelines, distribute to builders | Bylaw to control Construction Site Runoff was previously adopted. Bylaw requires erosion and sediment controls at construction sites disturbing one or more acres or less if part of common plan of development.   | Continue to require Erosion and Sedimentation controls in place for site work. Require stone entrances for construction sites, infiltration of roof runoff on all new buildings. Use hydro excavations for DPW utility projects. |
| 4-2<br>Revised | Control construction site waste                  | DPW, Code, Cons Comm.         | Reduce litter, erosion, dust, sediment   | Require weekly trench paving on utility and road projects to maintain cleaner job sites and reduce erosion. New Stormwater Bylaw helps control wastes such as discarded building materials, truck washout, chemicals, litter, and sanitary waste at construction sites.                  | Continue as directed by new NPDES permit.  |
| 4-3<br>Revised | ESC plans for disturbances >5,000 s.f.           | Code, DPW, Cons Comm.         | Draft bylaw by 7/07                      | Stormwater Management Bylaw requires permit from Stormwater Authority for projects disturbing greater than 1 acre or less than one acre if part of a common plan of development.   | Continue   |
| 4-4<br>Revised | Develop O&M plan for existing Town-owned systems | DPW                           | In place by 7/08                         | The BMP has been met through operation and maintenance of Town owned facilities, drain system cleaning and street sweeping operations. Town follows Stormwater Pollution Prevention Plans under the Construction General Permit for municipal projects disturbing greater than one acre. | Continue operation and maintenance of Town-owned systems.  |

#### 4a. Additions

## 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 13<br>(Reliance on non-municipal partners indicated, if any)  | Planned Activities   |
|-----------------|---|--|---|---|--|
| 5-1<br>Revised  | Develop bylaw to address stormwater impacts | Selectmen, Planning, DPW, Cons. SW Comm. | In place by 12/05                             | The Stormwater Management Bylaw that regulates post-construction stormwater runoff from new development and redevelopment projects disturbing one or more acres was adopted in a previous permit year. In Permit Year 13, finalized review of permits and forms to accompany Stormwater Management Regulations. | Continue to work towards formally adopting the Stormwater Management Regulations and incorporate updates relative to the new MS4 Permit. |
| 5-2<br>Revised  | Promote infiltration in new developments    | Planning, DPW, Code, Cons Comm           | No increase in flood levels or locations      | Continue to require infiltration of roof runoff on new structures. Bylaw sets performance standards for new projects by requiring compliance with the Mass. Stormwater Management Standards.  | Continue to promote infiltration in new developments including use of porous pavement for portions of new subdivisions.                  |
| 5-3<br>Revised  | Expand grass plots, reduce pavement widths  | DPW, Planning                            | Improve infiltration                          | Continue to require LID techniques during plan review. Required porous pavement sidewalks for new residential subdivisions. Reduced 2400s.f. of pavement areas with road paving project.  | Continue program.  |
| 5-4<br>Revised  | Research rain barrels                       | DPW                                      | Distribute to 10 households for pilot program | Measurable goal met - Program complete in Year 8.   | BMP complete. May continue in future years depending on interest, and available staff time and budget.                                   |
| 5a-5<br>Revised | Keep current with regulations               | Cons. Comm, Planning Board, DPW          |   | Continued to attend workshops, seminars, trade shows to understand and follow DEP and EPA regulations (See also BMP ID#2-4)   | Plan to attend EPA & DEP information meetings about the new MS4 Permit.  |
| 5a-6            | Organize local stormwater permits           | Cons. Comm, DPW                          |   | Maintaining data base of stormwater management plans for Cons. Comm. to   | Continue   |



| <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 13</b><br>(Reliance on non-municipal partners indicated, if any)                             | <b>Planned Activities</b>  |
|-----------------|-----------------------------|--------------------------------------|---------------------------|---|--|
| Revised         |                             |                                      |                           | track maintenance and reporting.  |  |
| 5a-7            | Repair failing catch basins | DPW                                  |                           | Rebuilt 13 catch basins in Year 13 to address sink holes around structures which lead to additional sediment in the drain system. | Continue to have catch basin cleaning crew mark which drainage structures need to be repaired and rebuilt. |
| Revised         |                             |                                      |                           |   |  |

## 5a. Additions

### 6. Pollution Prevention and Good Housekeeping in Municipal Operations

| <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 13</b><br>(Reliance on non-municipal partners indicated, if any)   | <b>Planned Activities</b>  |
|-----------------|--|--------------------------------------|----------------------------------|---|--|
| 6-1             | Street sweeping, CB cleaning                     | DPW                                  | 2x per year in critical areas    | Swept all roadways in the spring; Great Road, industrial areas and municipal properties swept monthly. All municipal catch basins cleaned.                      | Continue as directed by new NPDES permit.  |
| Revised         |  |                                      |                                  |   |  |
| 6-2             | Inspect older sewer mains                        | DPW, MWRA                            | TV 1 mile per year               | TV sections of sewer lines on an as-needed basis to resolve any flow issues.  | Following receipt of final report, plan projects to address direct or indirect inflow sources. |
| Revised         |  |                                      |                                  |   |  |
| 6-3             | Promote/use alternative fertilizers & pesticides | DPW, Cons Comm.                      | Reduce nitrogen loading          | DPW uses fertilizers on an As-Needed basis. Conservation Commission prohibits salts, herbicides and blanket fertilizers on projects adjacent to resource areas. | Continue policy.   |
| Revised         |  |                                      |                                  |   |  |
| 6-4             | Develop spill prevention plan                    | DPW, Fire, DEP                       | Purchase spill control equipment | Spill prevention plan has been previously developed and is in place.  | Regularly check inventory.   |
| Revised         |  |                                      |                                  |   |  |
| 6-5             | Site better snow dump                            | DPW                                  | Locate site by 12/05             | Goal met – snow dump site in place. Snow dump sites were not used in  | BMP complete – goal met.   |

| <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 13</b><br>(Reliance on non-municipal partners indicated, if any)  | <b>Planned Activities</b>  |
|-----------------|---|--------------------------------------|--|--|--|
| Revised         |   |                                      |  | Year 13. Continued use of magnesium chloride for ice control to reduce impacts from corrosive calcium chloride.  |  |
| 6a-6            | Provide yard waste disposal opportunities | DPW                                  | Provide opportunities  | Town landfill opened regularly for additional days (now including Wednesdays and Saturdays) from April thru November to bring yard waste to municipal compost site. The Town continues to sell compost bins to promote reuse of yard waste and food scraps into beneficial product. Sold 50 bins in Year 13. | Continue   |
| Revised         |   |                                      |  |  |  |
| 6a-7            | Provide Town Sewer                        | DPW                                  | Install new sewer mains to reduce # of septic systems.                         | Goal has been achieved. Extending sewer service to last 10 +/- properties is cost prohibitive.   | BMP complete. Town will continue to administer Title V and to operate and maintain the sewer system.                               |
| Revised         |   |                                      |  | Remaining septic systems are required to comply with Title 5 and local Board of Health regulations.  |  |
| 6a-8            | Geese Management                          | DPW                                  | Reduce geese feces in areas along public water supply and open bodies of water | Continued to use dogs to chase geese away from Shawsheen Wellfield, Fawn Lake and Springs Brook Park.  | Continue to control geese waste near waterways as needed. Support local industries that also use dogs to control geese gatherings. |
| Revised         |   |                                      |  |  |  |

**6a. Additions**

## 7. BMPs for Meeting Total Maximum Daily Load (TMDL) Waste Load Allocations (WLA)

Portions of the Town of Bedford’s MS4 discharge into the Shawsheen River, which has a Final Bacteria TMDL. The *Final Bacteria TMDL for the Shawsheen River Basin* is being met by BMP ID # 1-1, 1-4, 1a-6, 3-2, 3-3, 3-4, 3-5, 3a-6, 4-1, 4-3, 5-1, 5-2, 6-1, 6-2, 6a-7 and 6a-8.

The Town’s MS4 also discharges stormwater to the Concord River. The *Draft Pathogen TMDL for the Concord River Watershed* is not yet finalized and therefore the addition of BMPs to address the TMDL is not necessary at this time. The Town will assess TMDL requirements once the final next General Permit is issued.

### 7b. WLA Assessment

As verified by review of the 2012 State of Massachusetts Integrated List of Waters, approved by EPA on May 2, 2013, the water bodies within Town that are covered by the Shawsheen River Bacteria TMDL continue to be:

- Kiln Brook (MA83-10)
- Vine Brook (MA83-06),
- Spring Brook (MA83-14)
- Elm Brook (MA 83-05); and
- Shawsheen River (MA83-01, MA83-08 and MA83-17)

These waterbodies are shown on EPA’s map at [http://www.epa.gov/region1/npdes/stormwater/ma/305b303dMaps/Bedford\\_MA.pdf](http://www.epa.gov/region1/npdes/stormwater/ma/305b303dMaps/Bedford_MA.pdf)  
The following table summarizes the WLA and LA for the TMDL:

**Fecal Coliform Wasteload Allocations (WLAs) and Load Allocations (LAs) for the Shawsheen River and Identified Tributary Streams**

| Bacteria Source Category  | WLA (organisms/100ml)                | LA (organisms/100ml)                 |
|---------------------------|--------------------------------------|--------------------------------------|
| Point Source              | Geomean $\leq$ 200<br>10% $\leq$ 400 |                                      |
| Sewer leaks               | 0                                    | 0                                    |
| Sanitary Sewer Overflow   | 0                                    | 0                                    |
| Illicit Sewer Connections | 0                                    |                                      |
| Failing Septic Systems    | 0                                    | 0                                    |
| Direct Wildlife           |                                      | Geomean $\leq$ 200<br>10% $\leq$ 400 |
| Urban Stormwater Runoff   | Geomean $\leq$ 200<br>10% $\leq$ 400 | Geomean $\leq$ 200<br>10% $\leq$ 400 |

Because the TMDL is for a pollutant potentially found in stormwater discharges from the Town's MS4, the Stormwater Management Program includes BMPs that address the waste load allocation (WLA) from point sources that include illicit connections to the drainage system and urban stormwater runoff. Bedford continues to make progress on meeting the WLAs through implementing BMPs listed above and further described in the annual report.

To address Illicit Sewer Connections WLA, the Town has implemented the following BMPs:

- Drainage system Mapping (BMPs 3-1 and 3-2);
- Stormwater Management By-law that prohibits illicit discharges and illegal dumping (BMP 3-5);
- Ongoing water quality monitoring and outfall inspections (BMPs 3-2 and 3-4);
- Inspection of and improvement to old sewer mains (BMP 6-2); and
- Education of Residents and Businesses (BMPs 1-1 and 1-4).

To address the Urban Stormwater Runoff WLA, the Town has implemented the following BMPs in the Stormwater Management Program:

- Education on proper pet waste disposal and distribution of pet waste bags (BMP 1a-6);
- Construction Site Runoff Control through the Stormwater Management Bylaw (BMPs 4-1 and 4-3);
- Post-construction Stormwater Management through the Stormwater Management Bylaw (BMP 5-1); and
- Catch basin cleaning & street sweeping to keep debris from filling catch basins and maintain proper drainage system function (BMP 6-1).

In addition, the Board of Health regulates the design, construction, and inspection of the few septic systems and leach fields in Town (Town is 95% sewerred).

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

N/A

**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, 2015 through March 31, 2016)

**Programmatic**

|   |                   | Response     |
|---|-------------------|--------------|
| Stormwater management position created/staffed                | (y/n)             | Y            |
| Annual program budget/expenditures **                         | (Preferred) Units | \$32,000     |
| Total program expenditures since beginning of permit coverage | (\$)              | \$302,000    |
| Funding mechanism(s) (General Fund, Enterprise, Utility, etc) |                   | General Fund |
|   |                   |              |

**Education, Involvement, and Training**

|  |               |               |
|--|---------------|---------------|
| Estimated number of property owners reached by education program(s)        | (# or %)      | 95%           |
| Stormwater management committee established                                | (y/n)         | Yes           |
| Stream teams established or supported                                      | (# or y/n)    | Yes           |
| Shoreline clean-up participation or quantity of shoreline miles cleaned ** | (y/n or mi.)  | 0             |
| Shoreline cleaned since beginning of permit coverage                       | (mi.)         | 3,170 ft      |
| Household Hazardous Waste Collection Days                                  |               |               |
| ▪ days sponsored **  | (#)           | 8             |
| ▪ community participation **   | (# or %)      | 200 drop-offs |
| ▪ material collected **  | (tons or gal) | 2.5 tons      |
| School curricula implemented – with respect to recycling efforts           | (y/n)         | yes           |
|  |               |               |

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

### Mapping and Illicit Discharges

|  | Response                      |
|--|-------------------------------|
| Outfall mapping complete   | (%) 93%                       |
| Estimated or actual number of outfalls <i>*# has increased with new developments; now have 851 of which 375 are Town owned. 291 are defined by the Permit. Need to field check 37 known outlets.</i> | (Preferred Units) (#) 851*    |
| System-Wide mapping complete (complete storm sewer infrastructure)   | (%) 95%                       |
| Mapping method(s)  |                               |
| ▪ Paper/Mylar  | (%) 10                        |
| ▪ CADD   | x (%) 5                       |
| ▪ GIS  | (%) 85                        |
| Outfalls inspected/screened **   | (# or %) 0                    |
| Outfalls inspected/screened (Since beginning of permit coverage) <i>413 outlets checked. Of those, 291 are Town owned as defined by the Permit.</i>  | (# or %) 291*                 |
| Illicit discharges identified **   | (#) 1                         |
| Illicit discharges identified (Since beginning of permit coverage)   | (#) 1                         |
| Illicit connections removed **   | (# and gpd) 0; owner notified |
| Illicit connections removed (Since beginning of permit coverage)   | (# and gpd) 1                 |
| % of population on sewer   | (%) 95%                       |
| % of population on septic systems  | (%) 5%                        |

|  |  |  |
|--|--|--|
| * Reported numbers have been fluctuating as proper database queries are being refined each year. |  |  |
|--|--|--|

**Construction**

|  | Response                   |
|--|----------------------------|
| Number of construction starts (>1-acre) **   | (#) 5                      |
| Estimated percentage of construction starts adequately regulated for erosion and sediment control ** | (Preferred Units) (%) 100% |
| Site inspections completed **  | (# or %) 30 inspections    |
| 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 %) 3 inspections |
| BMP maintenance required through covenants, escrow, deed restrictions, etc.  | (y/n) Y                |
| Low-impact development (LID) practices permitted and encouraged  | (y/n) Y                |
|  |                        |

## 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)     | 2       |
| Qty of structures cleaned **   | (#)            | 1740    |
| Qty. of storm drain cleaned **   | (%, LF or mi.) | 0 lf    |
| Qty. of screenings/debris removed from storm sewer infrastructure **                         | (lbs. or tons) | 40 ton  |
| Disposal or use of screenings (landfill, POTW, compost, beneficial use, etc.) **             | (location)     | compost |

|   |                         |               |
|---|-------------------------|---------------|
| Basin Cleaning Costs                              |                         |               |
| • Annual budget/expenditure (labor & equipment)** | (\$)                    | 18,183.00     |
| • Hourly or per basin contract rate **            | (\$/hr or \$ per basin) | \$10.45/basin |
| • Disposal cost**                                 | (\$)                    | 0             |
| Cleaning Equipment                                |                         |               |
| • Clam shell truck(s) owned/leased                | (#)                     | 0             |
| • Vacuum truck(s) owned/leased                    | (#)                     | 1             |
| • Vacuum trucks specified in contracts            | (y/n)                   | 0             |
| • % Structures cleaned with clam shells **        | (%)                     | 98            |
| • % Structures cleaned with vector **             | (%)                     | 2             |

## Response

|   |                              |             |
|---|------------------------------|-------------|
| Average frequency of street sweeping (non-commercial/non-arterial streets) **           | (times/yr)                   | 2           |
| Average frequency of street sweeping (commercial/arterial or other critical streets) ** | (times/yr) (Preferred Units) | 12          |
| Qty. of sand/debris collected by sweeping **  | (lbs. or tons)               | 330 tons    |
| Disposal of sweepings (landfill, POTW, compost, beneficial use, etc.) **                | (location)                   | compost     |
| Annual Sweeping Costs   |                              |             |
| • Annual budget/expenditure (labor & equipment)**                                       | (\$)                         | \$14,000    |
| • Hourly or lane mile contract rate **  | (\$/hr. or ln mi.)           | \$119.00/hr |
| • Disposal cost**   | (\$)                         | 0           |



|   |       |     |
|---|-------|-----|
| <b>Sweeping Equipment</b>                       |       |     |
| • Rotary brush street sweepers owned/leased     | (#)   | 1   |
| • Vacuum street sweepers owned/leased           | (#)   | 0   |
| • Vacuum street sweepers specified in contracts | (y/n) | N   |
| • % 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:<br>("N/A" = never used; "100%" = elimination) |             |     |
| ▪ Fertilizers  | (lbs. or %) | 25% |
| ▪ Herbicides   | (lbs. or %) | N/A |
| ▪ Pesticides   | (lbs. or %) | 25% |
| <b>Integrated Pest Management (IPM) Practices Implemented</b>  | (y/n)       | Y   |

|  |   |                 |
|--|---|-----------------|
|  |   | <b>Response</b> |
| Average Ratio of Anti-/De-Icing products used **<br>(also identify chemicals and ratios used in specific areas, e.g., water supply protection areas) | (Preferred Units)<br>% NaCl<br>% CaCl <sub>2</sub><br>% MgCl <sub>2</sub><br>% CMA<br>% Kac<br>% Sand | 95%<br>5%       |
| Pre-wetting techniques utilized **   | (y/n or %)  | Y               |
| Manual control spreaders used **   | (y/n or %)  | Y               |
| Zero-velocity spreaders used **  | (y/n or %)  | Y               |
| 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 #)  | N               |
| 100% of salt/chemical pile(s) covered in storage shed(s) by May 2008   | (y/n)   | Y               |

**Water Supply Protection**

|   |          |   |
|---|----------|---|
| Storm water outfalls to public water supplies eliminated or relocated                             | # or y/n | 0 |
| Installed or planned treatment BMPs for public drinking water supplies and their protection areas | # or y/n | 0 |
| • Treatment units induce infiltration within 500-feet of a wellhead protection area               | # or y/n | N |