

Municipality/Organization: Ashland

EPA NPDES Permit Number: MAR041086/MADEP

MassDEP Transmittal Number: W- 036190

**Annual Report Number
& Reporting Period:** June 2016 to May 2017

NPDES PII Small MS4 General Permit Annual Report

Part I. General Information

Contact Person: Doug Small **Title:** DPW Director

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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: Doug Small

Title: DPW Director

Date: April 30, 2017

Part II. Self-Assessment

The Town of Ashland continues to be concerned that the next phase of the NPDES MS4 program will include requirements that the Town cannot afford to complete. While the Town does care greatly for the environment and believes that stormwater pollution is an important problem to address, the Town must be fiscally responsible. We implore the EPA to make the next MS4 permit easy to comply with given limited resources, or to provide a Federal funding mechanism to make compliance possible without putting undue pressure on local budgets.

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 7	Planned Activities Permit Year
1-1	Design and Distribute Brochures	DPW/Con Com	Educate the Public Via Sewer & Water Bills and brochures	Information on stormwater discussed and distributed at 2016 Farmers Market, volunteer days, and other outreach events	Continue outreach via Ashland Day, Earth Day, Farmers Markets.
1-2	Air Stormwater Information on Local CA/TV Station	DPW/Con Com	Educate the public	Goal eliminated	Goal eliminated
1-3	Form a Stormwater Committee (SWC)	Con Com	Inform the public	SWC dissolved after stormwater regulations adopted by Conservation Commission .	Evaluate and expand the mission statement of the SWC
1-4	Label Storm Drains	SWC	Ensure ongoing public education	Several storm drains were labeled as part of an Eagle Scout Project	Ongoing program as drains continually need to be relabeled.
1-5	High School Education	SWC	Educate the younger public	Goal eliminated when Stormwater Committee dissolved.	Revisit for new MS4 Permit.
1-6	Create Stormwater section of Website	DPW/Con Com	Activate new website	Website activated and contains information on stormwater including FAQs, videos, fact sheets and other basic information.	Goal achieved.

1a. Additions

1-7	Make the stormwater management plan available to the general public	DPW/Con Com/MIS	Post plan to stormwater section of the website	Goal eliminated. A stormwater management plan was not created.	Goal eliminated. The Town of Ashland will evaluate this for the next round of MS4 permitting.
1-8	Stormwater management media campaign	Con Com	Reach out to media for local coverage on stormwater management issues	Currently researching publications to create a brochure to distribute to Media sources	Continue publishing stormwater-related articles.
1-9	Stormwater traveling display	SWC	Develop display and showcase in three public locations.	Display was created, but the location of the display is unknown given staff turnover rate.	Locate display. If display cannot be found, than a new display will be created.
1-10	Conduct stormwater education at household hazardous waste day	DPW	Show stormwater display; distribute stormwater brochures	Stormwater brochures will be distributed at May 2017 HHWD.	Continue outreach program at HHWD.

2. Public Involvement and Participation

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 7	Planned Activities Permit Year
2-1	Enlist Local Citizens to the SWC	SWC	Involve local people in the development of the SWMP	Advertised on website, cable TV and newspaper for interested residents to join the Stormwater Committee. Garnered interest from three concerned citizens, one of whom became a new Conservation Commissioner.	Goal achieved.
2-2	Enlist local groups to label storm drains	SWC	Public aids in SW education	Working with local leaders to re-label faded storm drain stencils through community service program.	Ongoing program.
2-3	Form a Technical Committee	Highway Superintendent	Review and oversee stormwater issues	Educate Technical Review Committee about stormwater management and LID techniques by airing “Reining in the Storm” video at technical review committee meeting	Goal achieved.

2a. Additions

	Stream Team	SWC	Involve residents in	Older volunteer sheet was located.	Ongoing goal
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2-5			water quality monitoring on local streams.	Staff needs training on water quality monitoring to revive Stream Teams	

3. Illicit Discharge Detection and Elimination

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 7	Planned Activities Permit Year
3-1	Create a Drainage Map	Water & Sewer Department DPW Director	Map MS4	As of 2008, outfalls and culverts were mapped.	Next step is to double check mapping program for any holes and begin connecting catch basins to outfalls with drain lines in the maps.
3-2	Adopt an Illicit Discharge By-Law	Water & Sewer Department DPW Director/Con Com Agent	Town Adopts By-Law	Previous bylaws address the definition of Illicit Discharges and briefly touch upon applicability.	Goal partially achieved.
3-3	Enforcement of By-Law	DPW Director DPW Director/Con Com Agent	Discourage Violations	Previous stormwater management bylaws deal with the erosion control and runoff for a proposed site. This goal was achieved for enforcement of erosion control bylaws, but not achieved for illicit discharges	Goal partially achieved.
3-4	Train Staff & SWC in Outfall Inspection	TC DPW Director/Con Com Agent	Develop Inspection Program	Town Engineer to attend a workshop.	Attend workshops where financially feasible.
3-5	Provide Dry Weather Inspections to Outfalls	SWC, TC & DPW	Detect Illicit Discharges	Since outfall inspection in 2010, about 99% of outfalls were identified, mapped, and inspected. This work was contracted out. The DPW and Conservation Commission report on any outfalls that may have been missed	Goal achieved and is ongoing.

3a. Additions

3-6	Implement regular water quality sampling at outfalls	DPW/Con Com	Detect illicit discharges and problem areas	No progress made	Goal abandoned.
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4. Construction Site Stormwater Runoff Control

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 7	Planned Activities Permit Year
4-1	Adopt an Erosion/Sediment Control By-Law	Con Com/DPW	Adopt By-Law Reviewing By-law.	Goal achieved. Two bylaws were passed. Stormwater Management Bylaw Chapter 343 of 2008, and a Stormwater Management Bylaw, Chapter 247 of 2007	None.
4-2	Requirements and Procedures for Site Waste	Inspection services, planning board, DPW, SWC	Include provisions to control site waste in proposed by-law. Establish inspection policy and schedule and note and correct deficiencies.	Goal achieved. Two bylaws were passed. Stormwater Management Bylaw Chapter 343 of 2008, and a Stormwater Management Bylaw, Chapter 247 of 2007	None.
4-3	Procedures for site plan review	Planning Board	Ensure by-law includes provisions for site plan review. Consider providing guidance documents and other outreach materials to developers.	Goal achieved.	None.
4-4	Procedure for enforcement	Con Com	Discourage Violations and fine violators	Goal achieved. Two bylaws were passed. Stormwater Management Bylaw Chapter 343 of 2008, and a Stormwater Management Bylaw, Chapter 247 of 2007	None.

4a. Additions

4-5	Ensure construction site operators disturbing one acre or more implement sediment and erosion controls BMPs	Inspection services, Con Com, DPW, Planning Board, SWC	Establish inspection policy and schedule. Conduct routine inspections and note and correct deficiencies.	Ongoing.	Ongoing.
4-6	Develop procedures for receipt and consideration of	Inspection services, Con Com, DPW,	Develop a form for the public to provide information and	Goal eliminated	Goal eliminated

	information submitted by the public	Planning Board, SWC	designate municipal official to receive information.		
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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 7 (Reliance on non-municipal partners indicated, if any)	Planned Activities Permit Year 5
5-1	Adopt Stormwater Management Policy	Water & Sewer Department DPW Director and Con Com Agent	Town Adopt By-Law	Stormwater Management c. 343 Bylaw drafted and promulgated on May 28, 2008	Goal achieved.
5-2	Procedures for review of Stormwater BMP's	Water & Sewer Department Planning Board Agent and Con.Com. Agent	Ensure Proper BMP's are in place	Stormwater Management Bylaw c. 343 drafted and promulgated on May 28, 2008.	Goal achieved.
5-3	Procedures for long term operation & maintenance	Water & Sewer Department DPW, Planning and Con.Com. Agent	Ensure stormwater by-law includes language providing DPW authority to ensure proper O&M of all BMPs connecting to MS4.	Stormwater Management Bylaw c. 343 drafted and promulgated on May 28, 2008.	Goal achieved.

5a. Additions

5-4	Identify structural and non-structural best management practices appropriate for the Town	Planning Board, DPW, Con Com, Stormwater Committee	Identify standard practices that are not acceptable in the Town.	Stormwater Management Bylaw c. 343 drafted and promulgated on May 28, 2008..	Goal achieved.
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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 7 (Reliance on non-municipal partners indicated, if any)	Planned Activities Permit Year 5
6-1	Catch Basin Cleaning Program	Highway Superintendent DPW Director	Prevent Sedimentation Entering MS4	In 2015, the Town contracted with (COMPANY NAME?) to clean out the catch basins.	Continue catch basin cleaning program.
6-2	Street Sweeping Program	Highway Superintendent DPW Director	Prevent Sedimentation Entering MS4	Swept most of the total 85 miles of roadway and all town-owned parking lots, removing approximately xx cubic yards of material.	Continue street sweeping program.
6-3	Procedures for Housing Salts & Hazardous Materials	Highway Superintendent DPW Director	Prevent Leachate Entering MS4	Salt stored in shed. Material from street sweeping and catch basin cleaning are disposed of properly by contractor.	Continue existing program.
6-4	Procedures for Handle CB Cleaning	Highway Superintendent DPW Director	Prevent Leachate Entering MS4	Stored separate from other materials and properly disposed of by contractor.	Continue existing program.

6a. Additions

7. BMPs for Meeting Total Maximum Daily Load (TMDL) Waste Load Allocations (WLA) <<if applicable>>

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 3 (Reliance on non-municipal partners indicated, if any)	Planned Activities Permit Year 4
7-1	Identify Category 5 Outfalls	Water and Sewer Department	Identify category 5 inspection points		
7-2	Water quality testing at outfalls	Water and Sewer Department	Identify pollutants		
7-3	Identify Illicit Discharge Source	Water and Sewer Department	Detect Source		
7-4	Eliminate Pollutant	DPW Director	Enforce Illicit Discharge Bylaw	Illicit Discharge Bylaw will need to be drafted and approved at Town Meeting. Various meetings with boards, committees, the Town Manager and other stakeholders will be necessary.	Ongoing.

7a. Additions

7b. WLA Assessment

Part IV. Summary of Information Collected and Analyzed

Part V. Program Outputs & Accomplishments (OPTIONAL)

Programmatic

Stormwater management position created/staffed	No	
Annual program budget/expenditures		

Education, Involvement, and Training

Estimated number of residents reached by education program(s)	90% (with bill stuffers)	
Stormwater management committee established	Yes	
Stream teams established or supported	Failed to revive	
Household Hazardous Waste Collection Days		
▪ days sponsored	13	
▪ community participation	25%	

▪ material collected

CRTs/Elect: 42,747 lbs.	4 collection days
Batteries: 233 pounds	13 collection days
5,624 linear ft fluorescent lamps/bulbs	13 collection days
12 propane tanks	1 collection day
16 cubic yards oil based paint	13 collection days
21 oil filters	13 collection days
2,580 gallons used oil	13 collection days
1 55-gallon drum antifreeze	1 collection day
8 mercury thermostats	13 collection days
19 mercury thermometers	13 collection days
14 mercury switches	13 collection days
1.50 pounds elemental mercury	13 collection days

Legal/Regulatory

	In Place Prior to Phase II	Under Review	Drafted	Adopted
Regulatory Mechanism Status (indicate with "X")				
▪ Illicit Discharge Detection & Elimination		X		
▪ Erosion & Sediment Control				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

Mapping and Illicit Discharges

Outfalls mapping complete	99 %	
Estimated or actual number of outfalls, as of 2010 outfall inspection and GIS layers	384	
System-Wide mapping complete	55 %	
Mapping method(s)		
▪ Paper/Mylar	30 %	
▪ CADD	5 %	
▪ GIS	30 %	
▪ Field	30%	
Outfalls inspected/screened, as of 2010 outfall inspection and GIS layers	384	
Outfalls with flow, as of 2010 data	5%	
New outfalls mapped	<10	
Illicit discharges identified	0	
Illicit connections removed	0	
% of population on sewer	70 %	
% of population on septic systems	30 %	
*Compliant of restaurant grease being dumped into a private stormwater management system was investigated in conjunction with the DEP and was immediately resolved and remedied in July 2008.		

Construction

Number of construction starts (>1-acre)	7	
Estimated percentage of construction starts adequately regulated for erosion and sediment control	100%	
Site inspections completed, ongoing	100%	
Tickets/Stop work orders issued	0	
Fines collected	\$0	
Complaints/concerns received from public	5	

Post-Development Stormwater Management

Estimated percentage of development/redevelopment projects adequately regulated for post-construction stormwater control	All requiring site plan review and Stormwater Management Permit	
Site inspections completed	100%	
Estimated volume of stormwater recharged (gpy)	unknown	

Operations and Maintenance

Average frequency of catch basin cleaning (non-commercial/non-arterial streets)	Once every 4 years	
Average frequency of catch basin cleaning (commercial/arterial or other critical streets)	Once every 2 years	
Total number of structures cleaned	496	
Qty. of screenings/debris removed from storm sewer infrastructure	20 tons	
Disposal or use of sweepings (investigating beneficial use for landfill cap)	TBD	
Cost of screenings disposal	TBD	

Average frequency of street sweeping (non-commercial/non-arterial streets)	1 times/yr	
Average frequency of street sweeping (commercial/arterial or other critical streets)	1 times/yr	
Qty. of sand/debris collected by sweeping	60 tons	
Disposal of sweepings (investigating beneficial use for landfill cap.)	TBD	
Cost of sweepings disposal	TBD	
Vacuum street sweepers purchased/leased	0	
Vacuum street sweepers specified in contracts	N	

Reduction in application on public land of: (“N/A” = never used; “100%” = elimination)		
▪ Fertilizers	100	
▪ Herbicides	100	
▪ Pesticides	100	

Anti-/De-Icing products and ratios:		
<ul style="list-style-type: none"> • 100% NaCl used on most roads. • Low salt areas treated with 50% NaCl, 50% sand • CaCl₂ is kept on hand for pretreatment but rarely used 		
Pre-wetting techniques utilized	N	
Manual control spreaders used	Y	
Automatic or Zero-velocity spreaders used	N	
Salt pile(s) covered in storage shed(s)	Y	