Municipality/Organization: **Ashland**

EPA NPDES Permit Number: **MAR041086/MADEP**

MADEP Transmittal Number: **W- 036190**

Annual Report Number & Reporting Period: **June 2017 to May 2018**

NPDES PII Small MS4 General Permit Annual Report

Part I. General Information

Contact Person: John D. 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: John Douglas Small

Printed Name: Doug Small

Title: DPW Director

Date: May 1, 2018

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 2017-2018	Planned Activities Permit Year 2018-2019
1-1	Design and Distribute Brochures	DPW/Con Com	Educate the Public Via public education events, brochures	Information on stormwater discussed and distributed at 2017 Farmers Market, volunteer days, and other outreach events. Dog waste brochures distributed along with Dog licenses. Residential Stormwater pollution brochures distributed during the annual Household hazardous waste collection day and Electronic waste collection day. Articles in local newspapers were published. Further education opportunities scheduled for May town Meeting	Continue outreach via Ashland Day, Earth Day, and Farmers Markets and continue mailing brochures. Draft brochures for all audiences that are required within the MS4 permit.
1-2	Air Stormwater Information on Local CA/TV Station	DPW/Con Com	Educate the public	Stormwater information was aired on a local cable and on Board of Selectmen live cable.	Continue Outreach via the local TV periodically.

				Periodically we will continue to air stormwater information through the local TV station.	
1-3	Form a Stormwater Committee (SWC)	Con Com	Inform the public	Stormwater Advisory Committee was established to look into funding solutions for NPDES MS4 requirements. The charge was changed for advocacy and education regarding the MS4 requirements.	Finalize the advocacy and education for the landowners within the Town of Ashland.
1-4	Label Storm Drains	SWC	Ensure ongoing public education	Strom drains were not labeled this year.	Ongoing program as drains continually need to be relabeled. Perhaps interns or volunteers can do this.
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. Continue to post updates.

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	Anticipated completion of the Stormwater Management plan is in Fall 2018.	Efforts are ongoing. Planning to have a consultant to submit the SWMP. Once initially drafted, we will conduct a public hearing to understand comments. If comments are feasible, as determined by the DPW Director, we will incorporate them in.
1-8	Stormwater management media campaign	DPW/Con Com	Reach out to media for local coverage on stormwater management issues	Currently stormwater related information has been published during several months in the local newspaper.	Continue publishing stormwater-related articles.

1-9	Stormwater traveling display	SWC	Showcase display in three public locations.	Display was presented, during public events at the Public library, Green up Ashland day and Farmer's market. The EnviroScape (borrowed from DEP) was also present on some of the events. All of the material was explained as a hand-on and interactive goal for residents of all ages and backgrounds.	Continue to display during public outreach events.
1-10	Conduct stormwater education at household hazardous waste day	DPW	Distribute stormwater brochures.	Residential Stormwater Pollution brochures were distributed at May 2017 Household Hazardous Waste Day (HHWD) and 2018 Electronics recycling day(ERD).	Continue outreach program at HHWD and ERD

2. Public Involvement and Participation

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 2017-2018	Planned Activities Permit Year 2018-2019
2-1	Enlist Local Citizens to the SWAC	SWAC	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.	Goal achieved.
2-2	Enlist local groups to label storm drains	SWC	Public aids in SW education	Working with school department to re-label faded storm drain stencils through community service program.	Ongoing program.
2-3	Form a Technical Committee	Planning	Review and oversee stormwater issues	Emphasize LID techniques and review local town-by law potential modifications.	Goal ongoing .

2a. Additions

2-5	Stream Team	SWC	Involve residents in water quality monitoring on local streams.	Older volunteer sheet was located. Staff needs training on water quality monitoring to revive Stream Teams	Ongoing goal: we will need to revive the stream team, get staff training and offer training on this.

3. Illicit Discharge Detection and Elimination

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 2017-2018	Planned Activities Permit Year 2018-2019
3-1	Create a Drainage Map	DPW /Con Com	Map MS4	As of 2008, outfalls and culverts were mapped. Some drain lines are mapped. GIS Streams layer was also created to assist with the anticipated mapping requirements for the 2016 permit.	Next step is to double check mapping program for any discrepancies, and begin connecting catch basins to outfalls with drain lines in the maps. Update storm infrastructure layers to correspond with new developments. There is also an interest to map retention basins and detention basins from the Board of Health. They have a list drafted, now we just need to add points to a map.
3-2	Adopt an Illicit Discharge By-Law	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. As part of the SWMP, and IDDE plan is scheduled to be developed in fall of 2018. IDDE by-law will be subsequently developed based on the plan.Projected team work with SWAC, Planning Board, Board of Health Conservation Commission and DPW to determine other elements to be in an IDDE Bylaw.
3-3	Enforcement of By-Law	DPW Director DPW /Con Com	Discourage IDDE 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. See above for IDDE.
3-4	Train Staff in Outfall Inspection	DPW /Con Com	Develop Inspection Program	Town Engineer and a Field technician attended a workshop to develop an Outfall inspection program.	Other personnel are to attend workshops where financially feasible. The goal is to provide training internally.
3-5	Provide Dry Weather Inspections to Outfalls	DPW & Con Comm Agent	Detect Illicit Discharges	Site inspections are carried out by theTown Personnelduring and after rain events to detect illicit discharges if reported / spotted.	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	We joined a regional stormwater coalition so we can access necessary equipment and test kits, but further training of staff is necessary.	Working on addressing this for the new MS4.

4. Construction Site Stormwater Runoff Control

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 2017-2018	Planned Activities Permit Year 2018-2019
4-1	Adopt an Erosion/Sediment Control By-Law	Con Com/DPW	Adopt By-Law	Goal achieved. Two bylaws were passed. Stormwater Management Bylaw Chapter 343 of 2008, and a Stormwater Management Bylaw, Chapter 247 of 2007	Regular implementation, administration and enforcement
			Reviewing By-law.		
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	Regular implementation, administration and enforcement
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.	Regular implementation, administration and enforcement
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	Regular implementation, administration and enforcement

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.		

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 2017-2018 (Reliance on non-municipal partners indicated, if any)	Planned Activities Permit Year 2018-2019
5-1	Adopt Stormwater Management Policy		Town Adopt By-Law	Stormwater Management Chapter 343 Bylaw drafted and promulgated on May 28, 2008	Goal achieved.
		DPW Director and Con Com Agent			
5-2	Procedures for review of Stormwater BMP's		Ensure Proper BMP's are in place	Stormwater Management Bylaw c. 343 drafted and promulgated on May 28, 2008.	Goal achieved.
		Planning Board Agent and Con.Com. Agent			
5-3	Procedures for long term operation & maintenance		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.
		DPW, Planning and Con.Com. Agent			

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.

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 2017-2018 (Reliance on non-municipal partners indicated, if any)	Planned Activities Permit Year 2018-2019
6-1	Catch Basin Cleaning Program	Highway Superintendent DPW Director	Prevent Sedimentation Entering MS4	In 2017, the Town contracted with Truax Corp. out of Plainville, MA. to clean out catch basins in low lying areas and downtown Ashland.	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 approximately380 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 2017-2018 (Reliance on non-municipal partners indicated, if any)	Planned Activities Permit Year 2018-2019
7-1	Outfall Ranking	DPW Department	Identify Problem, High and Low priority outfalls for inspection points	Initial ranking of outfalls – work in progress using GIS and AutoCAD tools.	Ranking to be revisited based on dry weather and wet weather inspections.
7-2	Water quality testing at outfalls	DPW Department	Identify pollutants	Town has performed a couple of problem outfall inspections visually.	Goal partially achieved. Next steps are to coordinate with the coalition on tools and training for water quality testing.
7-3	Identify Illicit Discharge Source	DPW / Conservation	Detect Source	Previous bylaws address the definition of Illicit Discharges and briefly touch upon applicability.	Next steps are to develop an IDDE bylaw.
7-4	Eliminate Pollutant	DPW	Enforce Illicit Discharge Bylaw	MA DEP was notified for a couple of spills through the health department.	Ongoing. 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.

7a. Additions

7b. WLA Assessment

Part IV. Summary of Information Collected and Analyzed

Streams layer for GIS has been created based on aerial photography and CAD plan submissions.

Wetlands GIS layer for Ashland is in the process of updates based on aerial photography and CAD plan submissions.

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%	
Stormwater management committee established	Yes	
Stream teams established or supported	No	
Household Hazardous Waste Collection Days		
▪ days sponsored	13	
▪ community participation	25%	
▪ material collected	CRTs/Elect: 36,320 lbs.	4 collection days
	Batteries: 282 pounds	13 collection days
	5,200 linear ft fluorescent lamps/bulbs	13 collection days
	8 propane tanks	1 collection day

	14 cubic yards oil based paint	13 collection days
	25 oil filters	13 collection days
	2,250 gallons used oil	13 collection days
	1-55-gallon drum antifreeze	13 collection days
	14 mercury thermostats	13 collection days
	8 mercury thermometers	13 collection days
	5 mercury switches	13 collection days
	0 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

Outfall 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 %	

Construction

Number of construction starts (>1-acre)	TBD	
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	616	
Qty. of screenings/debris removed from storm sewer infrastructure	428 Cubic yards	
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	1	
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: • 100% NaCl used on most roads. • Low salt areas treated with 50% NaCl, 50% sand • $CaCl_2$ 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	