

Part I: General Conditions

General Information

Name of Municipality or Organization: State:

EPA NPDES Permit Number (if applicable):

Primary MS4 Program Manager Contact Information

Name: Title:

Street Address Line 1:

Street Address Line 2:

City: State: Zip Code:

Email: Phone Number:

Fax Number:

Other Information

Stormwater Management Program (SWMP) Location (web address or physical location, if already completed):

Eligibility Determination

Endangered Species Act (ESA) Determination Complete?

Eligibility Criteria (check all that apply): ☒ A ☐ B ☐ C

National Historic Preservation Act (NHPA) Determination Complete?

Eligibility Criteria (check all that apply): ☒ A ☐ B ☐ C

☒ Check the box if your municipality or organization was covered under the 2003 MS4 General Permit

MS4 Infrastructure (if covered under the 2003 permit)

Estimated Percent of Outfall Map Complete?
(Part II, III, IV or V, Subpart B.3.(a.) of 2003 permit)

If 100% of 2003 requirements not met, enter an estimated date of completion (MM/DD/YY):

Web address where MS4 map is published:
If outfall map is unavailable on the internet an electronic or paper copy of the outfall map must be included with NOI submission (see section V for submission options)

Regulatory Authorities (if covered under the 2003 permit)

Illicit Discharge Detection and Elimination (IDDE) Authority Adopted? Effective Date or Estimated Date of Adoption (MM/DD/YY):
(Part II, III, IV or V, Subpart B.3.(b.) of 2003 permit)

Construction/Erosion and Sediment Control (ESC) Authority Adopted? Effective Date or Estimated Date of Adoption (MM/DD/YY):
(Part II, III, IV or V, Subpart B.4.(a.) of 2003 permit)

Post- Construction Stormwater Management Adopted? Effective Date or Estimated Date of Adoption (MM/DD/YY):
(Part II, III, IV or V, Subpart B.5.(a.) of 2003 permit)

Part II: Summary of Receiving Waters

Massachusetts list of impaired waters: Massachusetts 2014 List of Impaired Waters- <http://www.mass.gov/eea/docs/dep/water/resources/07v5/14list2.pdf>

Click to lengthen table

Click to lengthen table

Notice of Intent (NOI) for coverage under Small MS4 General Permit

Part III: Stormwater Management Program Summary

Identify the Best Management Practices (BMPs) that will be employed to address each of the six Minimum Control Measures (MCMs). For municipalities/organizations whose MS4 discharges into a receiving water with an approved Total Maximum Daily Load (TMDL) and an applicable waste load allocation (WLA), identify any additional BMPs employed to specifically support the achievement of the WLA in the TMDL section at the end of part III.

For each MCM, list each existing or proposed BMP by category and provide a brief description, responsible parties/departments, measurable goals, and the year the BMP will be employed (public education and outreach BMPs also requires a target audience). **Use the drop-down menus in each table or enter your own text to override the drop down menu.**

MCM 1: Public Education and Outreach

BMP Media/Category (enter your own text to override the drop down menu)	BMP Description	Targeted Audience	Responsible Department/Parties (enter your own text to override the drop down menu)	Measurable Goal	Beginning Year of BMP Implementation
Brochures/Pamphlets	information	Residents	Community Development Dept. and DPW Operations	increased mitigation	2018
Newspaper Articles/Press Releases	information	Businesses, Institutions and Commercial Facilities	DPW Operations and Community Development Dept	increased mitigation	2018
Brochures/Pamphlets	information	Developers (construction)	engineering, building dept and community development dept.	increased mitigation	2018
Brochures/Pamphlets	information	Industrial Facilities	building dept, DPW Operations	increased mitigation	2018
Meeting	information	Residents	community development dept, building dept, DPW Operations and E	increased mitigation	2018
Meeting	information	Businesses, Institutions and Commercial Facilities	Community development dept, building dept, DPW Operations and E	increased mitigation	2018
Meeting	information	Developers (construction)	Community development dept, building dept, DPW Operations and E	increased mitigation	2018
Meeting	information	Industrial Facilities	Community development dept, building dept, DPW Operations and E	increased mitigation	2018

Part III: Stormwater Management Program Summary (continued)

[illegible]

[illegible]

Notice of Intent (NOI) for coverage under Small MS4 General Permit

Part III: Stormwater Management Program Summary (continued)

MCM 3: Illicit Discharge Detection and Elimination (IDDE)

BMP Categorization (enter your own text to override the drop down menu)	BMP Description	Responsible Department/Parties (enter your own text to override the drop down menu)	Measurable Goal (all text can be overwritten)	Beginning Year of BMP Implementation
SSO inventory	Develop SSO inventory in accordance of permit conditions	DPW Operations and Water and Sewer Department	Complete within 1 year of effective date of permit	2019
Storm sewer system map	Create map and update during IDDE program completion	Engineering	Update map within 2 years of effective date of permit and complete full system map 10 years after effective date of permit	2019
Written IDDE program	Create written IDDE program	Water and Sewer Department and DPW Operations	Complete within 1 year of the effective date of permit and update as required	2018
Implement IDDE program	Implement catchment investigations according to program and permit conditions	DPW Operations and Sewer Dept.	Complete 10 years after effective date of permit	2025
Employee training	Train employees on IDDE implementation	DPW Operations and Water and Sewer Department	Train annually	2018
Conduct dry weather screening	Conduct in accordance with outfall screening procedure and permit conditions	DPW Operations	Complete 3 years after effective date of permit	2019
Conduct wet weather screening	Conduct in accordance with outfall screening procedure	DPW Operations	Complete 10 years after effective date of permit	2025
Ongoing screening	Conduct dry weather and wet weather screening (as necessary)	DPW Operations	Complete ongoing outfall screening upon completion of IDDE program	2019

[illegible]

Notice of Intent (NOI) for coverage under Small MS4 General Permit

Part III: Stormwater Management Program Summary (continued)

MCM 4: Construction Site Stormwater Runoff Control

BMP Categorization (enter your own text to override the drop down menu or entered text)	BMP Description	Responsible Department/Parties (enter your own text to override the drop down menu)	Measurable Goal (all text can be overwritten)	Beginning Year of BMP Implementation
Site inspection and enforcement of Erosion and Sediment Control (ESC) measures	Complete written procedures of site inspections and enforcement procedures	Building Permitting and Enforcement and Engineering Department	Complete within 1 year of the effective date of permit	2018
Site plan review	Complete written procedures of site plan review and begin implementation	Community Development Department, Engineering Department and DPW Operations	Complete within 1 year of the effective date of permit	2018
Erosion and Sediment Control	Adoption of requirements for construction operators to implement a sediment and erosion control program	Community Development Department, Engineering Department and DPW Operations	Complete within 1 year of the effective date of permit	2018
Waste Control	Adoption of requirements to control wastes, including but not limited to, discarded building materials, concrete truck wash out, chemicals, litter, and sanitary wastes	DPW Operations, Schools, Board of Health and Building Permitting and Enforcement	Complete within 1 year of the effective date of permit	2018
Pre-Construction/Coordination Meetings	Develop operating procedures to get Engineering, Building and Developer to meet prior to project starting	Building Dept, DPW Operation, Engineering, Community Development Dept.	Complete within 1 year of the effective date of permit	2018

Row	Dracut	Page	Page
1			
2			
3			
4			
5			
6			
7			
8			
9			

Notice of Intent (NOI) for coverage under Small MS4 General Permit

Part III: Stormwater Management Program Summary (continued)

MCM 5: Post-Construction Stormwater Management in New Development and Redevelopment

BMP Categorization (enter your own text to override the drop down menu or entered text)	BMP Description	Responsible Department/Parties (enter your own text to override the drop down menu)	Measurable Goal (all text can be overwritten)	Beginning Year of BMP Implementation
As-built plans for on-site stormwater control	The procedures to require submission of as-built drawings and ensure long term operation and maintenance will be a part of the SWMP	Dracut Planning Board, Board of Selectmen, Zoning Board of Appeals and Conser	Require submission of as-built plans for completed projects	2020
Target properties to reduce impervious areas	Identify at least 5 permittee-owned properties that could be modified or retrofitted with BMPs to reduce impervious areas and update annually	DPW Operations, Town Engineer and Community Development Director	Complete 4 years after effective date of permit and report annually on retrofitted properties	2020
Allow green infrastructure	Develop a report assessing existing local regulations to determine the feasibility of making green infrastructure practices allowable when appropriate site conditions exist	Various Boards and Commissions that permit construction projects as well as rela	Complete 4 years after effective date of permit and implement recommendations of report	2020
Street design and parking lot guidelines	Develop a report assessing requirements that affect the creation of impervious cover. The assessment will help determine if changes to design standards for streets and parking lots can be modified to support low impact design options.	DPW Operations, Community Development Department, Engineering Departme	Complete 4 years after effective date of permit and implement recommendations of report	2020

[illegible]

Notice of Intent (NOI) for coverage under Small MS4 General Permit

Part III: Stormwater Management Program Summary (continued)

MCM 6: Municipal Good Housekeeping and Pollution Prevention

BMP Categorization (enter your own text to override the drop down menu or entered text)	BMP Description	Responsible Department/Parties (enter your own text to override the drop down menu)	Measurable Goal (all text can be overwritten)	Beginning Year of BMP Implementation
O&M procedures	Create written O&M procedures including all requirements contained in 2.3.7.a.ii for parks and open spaces, buildings and facilities, and vehicles and equipment	DPW Operations, Engineering, Conservation Commission and Commur	Complete and implement 2 years after effective date of permit	2019
Inventory all permittee-owned parks and open spaces, buildings and facilities, and vehicles and equipment	Create inventory	DPW Operations, Recreation Department and Community Developer	Complete 2 years after effective date of permit and implement annually	2019
Infrastructure O&M	Establish and implement program for repair and rehabilitation of MS4 infrastructure	DPW Operations, Engineering and Community Development Dept.	Complete 2 years after effective date of permit	2019
Stormwater Pollution Prevention Plan (SWPPP)	Create SWPPPs for maintenance garages, transfer stations, and other waste-handling facilities	DPW Operations	Complete and implement 2 years after effective date of permit	2019
Catch basin cleaning	Establish schedule for catch basin cleaning such that each catch basin is no more than 50% full and clean catch basins on that schedule	DPW Operations	Clean catch basins on established schedule and report number of catch basins cleaned and volume of material moved annually	2019
Street sweeping program	Sweep all streets and permittee-owned parking lots in accordance with permit conditions	DPW Operations	Sweep all streets and permittee-owned parking lots once per year in the spring	2019
Road salt use optimization program	Establish and implement a program to minimize the use of road salt	DPW Operations	Implement salt use optimization during deicing season	2019

Inspections and maintenance of stormwater treatment structures	Establish and implement inspection and maintenance procedures and frequencies	Engineering, DPW Operations	Inspect and maintain treatment structures at least annually	2019
Compliance with Wetland Protection Act		Conservation Committee		2017
Composting Program		DPW Operations		2017
Development of a Master Plan		Planning/zoning Department		2019
Evaluate the use schedule of the Zoning Bylaw		Planning/zoning Department		2019
Installation of BMP Retrofits for Water Quality		Kenwood Water District and Dracut Water District		2020
Low Impact Development Plans		Planning/zoning Department		2018
Medical Waste Collection		Board of Health and Health Agent		2017
Municipal Building Inspections		Building Permitting and Enforcement		2018
Purchase Lands for Conservation		Community Preservation Committee, Community Development Director		2017
Water Monitoring/Testing		Board of Health and Health Agent		2019
Recycling Program		Town Manager		2017

Notice of Intent (NOI) for coverage under Small MS4 General Permit

Part III: Stormwater Management Program Summary (continued)

Actions for Meeting Total Maximum Daily Load (TMDL) Requirements

Use the drop-down menus to select the applicable TMDL, action description to meet the TMDL requirements, and the responsible department/parties. If no options are applicable, or more than one, **enter your own text to override drop-down menus.**

[illegible]

Part III: Stormwater Management Program Summary (continued)

Use the drop-down menus to select the pollutant causing the water quality limitation and enter the waterbody ID(s) experiencing excursions above water quality standards for that pollutant. In addition, if you are subject to additional requirements due to a downstream nutrient impairment (see Part 2.2.2 of the permit) select the pollutant of concern and indicate applicable waterbody IDs or write "all waterbodies" if applicable. Choose the action description from the dropdown menu and indicate the responsible party. If no options are applicable, or more than one, **enter your own text to override drop-down menus.**

[illegible]

Part IV: Notes and additional information

Use the space below to indicate the part(s) of 2.2.1 and 2.2.2 that you have identified as not applicable to your MS4 because you do not discharge to the impaired water body or a tributary to an impaired water body due to nitrogen or phosphorus. Provide all supporting documentation below or attach additional documents if necessary. Also, provide any additional information about your MS4 program below.

The bulk of the town of Dracut's water bodies are impaired with E. Coli, some floatables and aquatic weeds. To address the E.coli issue, the town has stepped up its pet waste programs and will, in future years, work with the local farming community to better address farm manure storage and incorporation into the soil. Another possibility is that some of the E.Coli contamination is from geese populations that gather on sports fields, farm fields and lawns that have just been seeded.

In the past three years the Town of Dracut has moved forward on the following initiatives to better address the MS4 permit, former and new permit:

Established a Stormwater enterprise fund to address stormwater per property, with a stormwater fee to be imposed starting in Fall 2018;

Is working on accurate maps of impervious areas, which were generated from a fly-over of the region this past spring;

Approved a Stormwater and Erosion Control Bylaw in 2017 to address stormwater and erosion issues townwide;

Established a Stormwater Committee, consisting of applicable town staff and residents, to review stormwater projects;

Established a site plan review process for all new construction over a certain size, to address traffic and stormwater;

Is working on development of new subdivision rules and regulations to allow for Low Impact Development and to require a variety of different road widths and requirements, based on the type of use and number of dwellings;

Established a IDDE program to identify issues within the the Town's sewer system and adopted an Illicit Discharge General Bylaw in 2018;

Established an Agricultural Commission to assist the Town agencies in better controlling farm wastes; and

Established a comprehensive stormwater "team" to address the MS4 permit requirements and work to comply with the Federal Laws that our community must abide by.

Notice of Intent (NOI) for coverage under Small MS4 General Permit

Page 18 of 18

Part V: 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, I certify that 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.

Name:

James A. Duggan

Title:

Town Manager

Signature:

Date:

09/26/18

[To be signed according to Appendix B, Subparagraph B.11, Standard Conditions]

Note: When prompted during signing, save the document under a new file name

Notice of Intent (NOI) for coverage under Small MS4 General Permit

Page 18 of 18

Part V: 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, I certify that 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.

Name:

James A. Duggan

Title:

Town Manager

Signature:

James A. Duggan

Digitally signed by James A.
Duggan
Date: 2018.09.26 18:36:03 -04'00'

Date:

09/26/18

[To be signed according to Appendix B, Subparagraph B.11, Standard Conditions]

Note: When prompted during signing, save the document under a new file name

November 5, 2018

Mr. Newton W. Tedder
U.S. Environmental Protection Agency, Region 1
5 Post Office Square, Suite 100
Mail Code OEP06-4
Boston, MA 02109-3912

Re: Notice of Intent (NOI) for EPA Stormwater Permit
NPDES PERMIT ID: MAR041194

Dear Mr. Tedder:

Recently you requested supplemental information to our original filing for the Notice of Intent for Dracut's Stormwater Permit. As the drop down menus of the EPA format are not allowing us to insert our preferred language into the permit, we are offering the supplemental information in letter format.

The following information is offered:

1. ESA Eligibility: The Town's planned discharge activities will not adversely affect endangered species. Using the USFW IPac process, no critical habitats were found in the Town of Dracut for a threatened species, the Northern long-eared bat;
2. Public Education MCM: Education programs, measurable goals and dates for messaging: The Town of Dracut is required to contact residential, commercial and industrial property owners as well as developers and provide educational information relative to stormwater

management. The Town will be using Think Blue Massachusetts educational tools, which have been generated by the Massachusetts Statewide Municipal Stormwater Coalition, as well as develop workshops on stormwater pollution prevention and mitigation measures, such as rain gardens, rain barrels, contained stormwater systems (such as Cultec and Vortech systems), and programs on fertilizer use, composting and other actions that may lessen or prevent stormwater pollution. Educational literature and programming is anticipated twice a year, with additional literature on pet wastes and commercial and industrial wastes. The metric for measurement of success for these efforts would be stormwater testing to determine if pollution levels have decreased, as well as increased efforts in using stormwater systems (rain gardens, rain barrels, contained stormwater systems, etc).

In addition to written materials on stormwater pollution and water conservation, Dracut has several active radio stations which cater to Dracut residents. Each week talk shows are aired on various current topics facing the community. It is anticipated that an annual radio show will be aired to address stormwater pollution, water conservation and other related issues.

It is also anticipated that there will be a public educational program on stormwater pollution and water conservation in the Dracut School system. Whether first or second graders to high school students, age appropriate programs will be introduced annually in the science and art classes to educate Dracut's school children on the issues of stormwater pollution and how they can act to lessen the pollution. We are anticipating catch basin stenciling programs and other measures to continue the education programs.

One challenge unique to Dracut may be in working with the agricultural community on containment of agricultural wastes, which may be related to the stormwater impairment of E Coli. Dracut is a right to farm community and has historically generated crops for the Lowell and Boston food markets. Today is no exception, with hay and various other vegetable and fruit crops being sold in Boston and Lowell, as well as locally. Many of the Town's active farms are close to or within stream areas that eventually feed into the Merrimack River. Dracut's stormwater consultants and staff will work with the newly created Agricultural Commission on development of Best Management Practices (BMPs) procedures and methods of addressing animal waste run-off in an effort to minimize the impacts to streams in the areas of farm fields. The metric for measurement of success for this action would be outfall testing to see if E Coli levels have decreased.

3. TMDLs: Total Maximum Daily Loads are not applicable to the Town of Dracut.
4. Impairments: In addition to the E Coli impairment, Dracut's waters are impaired by Phosphorus. The Town plans to follow the requirements of Appendix H, Part II to address Phosphorus impairment. The Town will follow the requirements of Appendix H, Part III for all discharges to waterbodies impaired with E Coli.

5. Also attached is the original electronic form with the original NOI.

I thank you for the opportunity to supplement the Town of Dracut's NOI application form. My staff and I look forward to working with you and Fred Civian at MassDEP on this project. In the meantime, if you have any further questions or comments, please contact Elizabeth Ware of my staff at 978-453-4557 or eware@dracutma.gov or me.

Sincerely,

James A. Duggan
Town Manager
Town of Dracut, MA.

CC: Fred Civian, Mass DEP
Elizabeth Ware, Dracut Community Development