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Municipality/Organization: Town of Concord, MA

EPA NPDES Permit Number: MA041187

MassDEP Transmittal Number: W-035280

**Annual Report Number
& Reporting Period:** No. 7: March 09-March 10

NPDES PII Small MS4 General Permit Annual Report (Due: May 1, 2010)

Part I. General Information

Contact Person: William J. Renault Jr., P.E. **Title:** Town 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: Christopher Whelan

Title: Town Manager

Date: 4/30/10

Part II. Self-Assessment

The Town of Concord, MA has completed the required self-assessment and has determined that our municipality is in compliance with all permit conditions.

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 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 8
1	Stormwater information page on Town of Concord website.	Concord Public Works (CPW)	Creation of [dedicated stormwater] website in 2009	Completed Website created in 2009 (Year 6) and linked to the town website. The page can be viewed at: http://www.concordma.gov under the Engineering Division's Page. Prior to 2009, stormwater information was posted on other town web pages as described below.	Continue to maintain the web page. As questions or comments arise, make edits to the page based upon frequently asked questions or comments.
Added		Division of Natural Resources (DNR)/CPW	Post stormwater information on other Town webpages.	Completed Mill Brook Task Force page posted prior to permit including information on stormwater education and basin tagging. CPW Water/Sewer Division page posted including information on water quality and posting of previous water quality reports including stormwater information.	Continue to maintain the web pages.
2	Provide stormwater informational bill inserts.	CPW	Annual bill inserts to be mailed in 2009. Insert stormwater informational into Water/Sewer Division mailings once or more annually.	Completed Provided Stormwater information within the Fall 2006 Water Connection mailer (newsletter for Concord Water customers). Stormwater information included within annual Water Quality Report mailing.	Continue to include stormwater information within CPW Water/Sewer Division mailings including the 2010 Water Quality Report.
Revised					

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 8
3	Drop-off/Swap-off recycling days	CPW	Hold twice a year, every year	Completed Drop-off/Swap-off recycling days held May 9, 2009 and October 10, 2009. The October 2009 event included an unwanted pharmaceuticals collection.	Drop-off/Swap-off recycling days currently scheduled for May 8, 2010 and October 9, 2010. May 2010 event will again include unwanted pharmaceuticals collection.
4	Provide stormwater information to businesses	CPW	Notify and send link via email to businesses.	Completed Emailed flyers/information and website link to over 400 businesses throughout the Town, via Chamber of Commerce.	Continue providing information via yearly email to businesses.
Added		CPW	Provide stormwater flyers to businesses in conjunction with annual business recycling event	Completed Provided informational flyers on stormwater to businesses that participated in Town recycling events on Oct 2 nd 2009 and April 2 nd 2010.	Continue to provide information to businesses at business recycling events tentatively scheduled for October 7, 2010 and April 1, 2011.
	5	CPW	Maintain at Town House, CPW Administration, and Dept. of Planning and Land management (DPLM)	Completed Always available	Continue to display and make available.
6	Hold "Conservation Coffees", informational and idea exchange sessions regarding maintenance of environmental quality.	DNR	Hold Monthly	Completed Held Monthly	Continue to hold monthly.
7	Provide informational brochures on open spaces and waterways.	Natural Resources Commission (NRC)	Maintain at Town House and NRC office.	Completed Always maintained	Continue to maintain and make available.

3. Illicit Discharge Detection and Elimination

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 8
14	Create GIS based drainage map of the entire Town	CPW	Create by year 5, maintain and update as needed.	Completed Inventory of drainage system (DMH, CBs and drain lines) completed within 2002-2003 and developed into a GIS data layer. 2004-2006: Drainage system mapping was field verified by Engineering Division and Highway Division staff. CPW Engineering Division staff accompanied catch basin cleaning crews to verify drainage location/modifications. Drainage system mapping updated when appropriate.	Continue to update GIS inventory as new information becomes available. Continue accompanying catch basin cleaning crews and update drainage system mapping when appropriate.
15	Town of Concord Public Storm Drainage Connection Policy (PSDCP)	CPW	In place; enforce at all times Year 6 – Policy Modification (sec. 6.3)	Completed Policy was approved by PWC and adopted by CPW prior to permit issuance. Policy regulates all connections to the Public Storm Drain system. Additional information provided to clarify Illicit Discharge Detection and Elimination (sec.6.3). Policy approved by PWC at April 2009 meeting. The revised policy was distributed to all new PSDCP applicants and enforcements.	Continue to enforce policy. Adopt new regulations as described below.

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 8
Revised		CPW	Modify policy to regulation based on feedback received from EPA Administrative Order requirements and comments received during Administrative Complaint process. Complete in Year 7; enforce at all times	Completed Drafted new regulations and forwarded to EPA for review and comment in January 2010.	Adopt regulations upon receipt of comments from EPA. Enforce at all times.
16	Develop system to locate priority areas of illicit connections.	CPW	System in place by end of year 6.	Completed Inventory of entire drainage system completed in association with BMP #14 (between 2002 and 2003) included visual inspection of all drainage structures (CBs and DMHs) within the Town. The inspection identified IDDE indicators including staining, dryflow, foam, odor, etc. CPW Highway and Engineering Division staff accompanied catch basin cleaning crews and inspected drainage structures for signs of illicit discharges. Half of catch basins in Town cleaned.	Continue to monitor drainage structures during catch basin cleaning and road repaving for any new signs of illicit connections. Remaining half of catch basins in Town will be cleaned.
Revised		CPW	Investigate <i>all</i> catch basins and drain manholes within Town (not just “priority” areas) for visual indicators of illicit discharges. In place by end of year 5. CPW Highway and Engineering Division staff accompany catch basin cleaning crews and inspect drainage structures for signs of illicit discharges.	Completed Performed follow up visual inspections and logged all structures and outfalls within priority areas by January 2010. Outfall Inspection matrix submitted to EPA pursuant to Compliance Order in January 2010.	
Added		CPW	Develop maps of priority areas for additional monitoring based on areas with positive indicators during 2002-2003 drainage system inventory. Perform follow up inspection for all priority areas including drainage structures and downstream outfalls.	Completed Performed follow up visual inspections and logged all structures and outfalls within priority areas by January 2010. Outfall Inspection matrix submitted to EPA pursuant to Compliance Order in January 2010.	Dry-weather flow sampling (see below).

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 8
Added		CPW	Based on requirement of EPA Administrative Order, perform visual inspections of all remaining outfalls outside of priority areas outlined above. Complete by end of Year 7	Completed Visual inspections and logging of all outfalls completed by the end of Year 7. <i>Outfall Inspection Matrix is included as an attachment with this Year 7 Annual Report.</i>	Perform sampling and analytical testing of outfalls identified with dryflow per Consent Order requirement. Complete by November 2010.
Added		CPW	Based on requirement of EPA Administrative Order, draft new IDDE Protocol by end of Year 7	Completed CPW drafted and supplied EPA with a document entitled "Town of Concord- IDDE Protocol" in January 2010. Provides a 5 phase standardized protocol for IDDE program.	Continue to follow protocol.
17	Develop procedure for tracing source of illicit connections.	CPW	Begin tracing beginning of May 2009. Address structures with indicators in 2002-2003 study either immediately or as part of catch basin cleaning and street repaving programs, depending on severity.	Completed Structures with indicators in 2002-2003 study addressed either immediately or as part of catch basin cleaning and street repaving programs, depending on severity of indicator, by end of Year 5. Walden Street discharge traced and eliminated.	Investigate sources of new potential illicit discharges as they become known.
Revised					
Added		CPW	Based on requirement of EPA Administrative Order, draft new IDDE Protocol by end of Year 7. Protocol includes a 5 phase standardized protocol for IDDE program.	Completed CPW drafted and supplied EPA with a document entitled "Town of Concord- IDDE Protocol" within Year 7. Provides a 5 phase standardized protocol for IDDE program.	Continue to utilize protocol and investigate sources of new potential illicit discharges as they become known.

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 8
18	Develop procedure for removing source of illicit/illegal discharges.	CPW	System in place by end of year 4.	Completed Town of Concord Public Storm Drain Connection Policy (in place prior to permit), outlines requirements for connections to the Town drainage system and includes sections on enforcement. The PSDCP was used within permit term to regulate and remove both stormwater discharges and non-stormwater discharges to the Town's drainage system.	Continue to enforce policy. Adopt new regulations upon receipt of comments from EPA.
Revised		CPW	Modify policy to regulation based on EPA Administrative Order and discussion and comments received during Administrative Complaint process. Complete in Year 7; enforce at all times	Completed Drafted new regulations and forwarded to EPA for review and comment in January 2010.	Adopt revised policy/regulations upon receipt of comments from EPA. Enforce at all times.
Revised		CPW	Based on requirement of EPA Administrative Order, draft new IDDE Protocol by end of Year 7.	Completed CPW drafted and supplied EPA with a document entitled "Town of Concord- IDDE Protocol" within Year 7. Provides a 5 phase standardized protocol for IDDE program which includes procedures for removing illicit discharges	Continue to utilize protocol and remove sources of new potential illicit discharges as they become known.

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 8
19	Develop procedure for evaluating the progress of the programs.	CPW	System in place by end of year 4.	Completed Engineering Division tracks catch basin cleaning, drainage work done during road repaving, outfalls investigated, and illicit discharges identified and eliminated.	Continue to track these measures.
Added		CPW	Based on requirement of EPA Administrative Order, draft new IDDE Protocol by end of Year 7	Completed CPW drafted and supplied EPA with a document entitled "Town of Concord- IDDE Protocol" within Year 7. Provides a 5 phase standardized protocol for IDDE program including procedure for follow up inspections and evaluation of illicit connection removal efforts.	Utilize protocol and perform follow-up testing/inspections when appropriate.
20	Implement BMPs 15-18	CPW	Begin implementation by Fall 2008	Completed BMPs 15-18 implemented as described above	
Revised	Implement BMPs 16-19 (i.e. the IDDE program)		Implement during Year 7	Completed IDDE program implemented.	Continue to carry out IDDE program.
21	Develop Wastewater Master Plan	CPW/ Water/Sewer	Completed creation by end of Year 1.	Completed CWMP created.	Continue to utilize guidelines within the CWMP.
Added		CPW/ Water/Sewer	Create Wastewater Planning Task Force to investigate possible amendments to the CWMP	Completed Board of Selectman created Wastewater Planning Task Force to further examine centralized wastewater treatment facility capacity constraints and develop recommendations for Town Meeting 2009 Approval	Continue Wastewater Capacity Study, investigating alternatives analysis to address wastewater capacity constraints and align comprehensive long range plan, planned production housing plan and comprehensive wastewater management plan.

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 8
23	Soil Erosion and Sediment Control section incorporated into Subdivision Rules and Regulations and Site Plan Review standards.	Dept. of Planning and Land Mgmt. (DPLM) / CPW	Section drafted by PD by end of Year 7.	Completed Since before permit issuance, CPW Design Standards and Construction Specifications have been in place. All development and redevelopment work regulated through subdivision review process, site plan review process, and Right of Way and Building permit application processes. All construction work performed in accordance with Concord Public Works Design Standards and Construction Specifications.	Continue to regulate development and redevelopment projects through subdivision review process, site plan review process and Right of Way permit application process and ensure construction performed in accordance with Concord Public Works Design Standards and Construction Specifications.
Revised			Soil Erosion and Sediment Control Standards updated within CPW Design Standards and Construction Specifications. Subdivision Rules and Regulations and Site Plan Review standards reference the design standards.	During Year 7, Soil Erosion and Sediment Control standards updated within Concord Public Works Design Standards and Construction Specifications.	
24	Site Plan Reviews by Town Staff	DPLM, DNR, CPW	All site plans reviewed for water quality concerns.	Completed All regulated site plans reviewed for water quality concerns and to ensure construction performed in accordance with Concord Public Works Design Standards and Construction Specifications.	Continue to review regulated site plans including but not limited to Erosion Control and Operations and Management for stormwater BMPs.
Added		DPLM, DNR, CPW	Purchase and implement new Town wide permitting software to improve the overall communication between departments/divisions	Ongoing Town staff reviewed permitting software from two vendors and are developing questions and reviewing options for selection.	Purchase and implement new Town wide permitting software.

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 8
29	MADEP Stormwater Standards 2, 3, 4, and 7.	NRC	100% compliance for all work within wetlands jurisdiction.	Completed All regulated projects comply with this standard.	Continue compliance with all regulated projects.
Revised		CPW	Concord Public Works Design Standards and Construction Specifications updated to require MADEP Stormwater standards met for all applicable development and redevelopment projects in Town requiring site plan review, subdivision review, a building permit and/or a ROW Permit.	Completed Plans reviewed to ensure conformance with Concord Public Works Design Standards and Construction Specifications and MADEP Stormwater standards.	Continue to ensure plans conform with Concord Public Works Design Standards and Construction Specifications and MADEP Stormwater standards.
30	Pre-construction review of regulated developments.	NRC, DPPLM, CPW	100% of proposed regulated projects reviewed.	Completed All regulated projects were reviewed.	Continue to review all regulated projects.
Revised		CPW	Concord Public Works Design Standards and Construction Specifications updated to require MADEP Stormwater standards met for all applicable development and redevelopment projects in Town requiring site plan review, subdivision review, a building permit and/or a ROW Permit.	Completed Plans reviewed to ensure conformance with Concord Public Works Design Standards and Construction Specifications.	Continue to ensure plans conform with Concord Public Works Design Standards and Construction Specifications.
31	Massachusetts Wetland Protection Act	NRC	100% of projects within wetland jurisdiction areas reviewed.	Completed All regulated projects were reviewed and permitted as necessary.	Continue to review and permit all projects as appropriate.