

**Granby
Department**

Highway

250 State St.
Granby, Ma 01033
(413) 467-7575

April 23, 2008

Massachusetts Department of Environmental Protection
Division of Watershed Management
627 Main Street
Worcester, MA 01608

Re: Annual Report NPDES Permit #041007

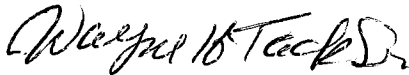
Attn: Mr. Glenn Haas

Dear Mr. Haas:

Enclosed is a report from the Town of Granby on the implementation of our stormwater management program.

If you have any further questions, please contact Chris Martin Town Administrator or David Desrosiers, Highway Superintendent.

Sincerely,



Wayne Tack
Selectman

Cc: US EPA

Self Assessment:

The Town of Granby has made consistent progress and improvements in its storm phase II program. Granby is a small town with limited financial resources but it is committed to this endeavor. We have not allowed these financial constraints to preclude us from achieving our goals. Through the hard work of our employees and prudent management of our modest budget we are making steady progress.

During the first permit cycle, we have nearly completed mapping all of our assets with GPS. This includes our stormdrain system, all outfalls, and the sanitary sewer system. This year, we finished locating and mapping a few of the sewer cleanouts that were buried below ground.

Even though we are a small community, we utilize the GIS data quite extensively to manage our stormdrain system. We have found the GIS data to be an essential tool. It is definitely one of the greatest ancillary benefits to the town resulting from the storm phase II program. It has helped us to locate and manage assets that were previously unknown and neglected.

Our town elected to purchase the equipment and map the system in-house. We would strongly encourage other towns to take the same course of action. When we first set out it seemed to be a daunting task; however, the new technology is quite easy to use. In addition, utilization of town employees to map the system has the secondary benefit of increasing the employee's knowledge of the system during collection of the field data. We would be happy to share our experiences with other towns that may be considering this option.

We have been in contact with Mr. Gregg Peters a senior at the University of Massachusetts. We hope to have him or other interns assist us in organizing the GIS data into geo-databases. This will allow us to share the data more easily with other departments.

The erosion and sediment control regulations and illicit discharge regulations have been reviewed by town counsel. The sewer commissioners have adopted the proposed regulations into our town's sewer regulations. We have previously purchased the software to manage the permits. The changes to the sewer regulations will be advertised in the newspaper in the near future. We hope to have the permit process in place and fully operational within the next few months.

Last year the town applied to the Department of Environmental Protection for a waste oil collection center permit and a permit to operate a waste-oil fired space heater. The DPW was granted approval to operate a waste oil collection center and began accepting used waste oil. This year the advertising of this program was mostly word of mouth. We began slowly and did not publicize the service to ensure that we would not be overwhelmed at the onset. Many residents are now using our center to dispose of their waste oil. Next year, we hope to publicize this program. We suspect that program will generate enough waste oil to be the primary source of heat for our DPW facility.

As mentioned in previous reports, the DPW has purchased a vacuum truck and jet rodder. Owning this equipment has allowed us to significantly increase the amount of catch basin cleaning performed each year. In fact, this year we were able to clean almost 75 percent of the catch basins in town.

We are very pleased with the work done through the Connecticut River Stormwater Committee. A complete report from this committee is attached as appendix A. We believe that the pooling of resources through this committee is a very cost effective method to accomplish the public education component of our program. Anne Capra from the Pioneer Valley Planning Commission has given very good public presentations to the Granby Lions Club and many other local organizations. We believe this type of program is very effective in increasing awareness about stormwater. The Connecticut River Stormwater Committee has discussed scaling back the amount of money spent on the 60 second sound bite advertising on television and radio in the future so that more of our efforts can be focused on public presentations.

In addition to the above, the DPW continues to work on many drainage improvements throughout town. Paved swales are added on hills to prevent erosion. Grassed swales are utilized in appropriate areas and rip rap placed where necessary.

In summary, we believe that our stormwater program is functioning as intended. We believe that the current level of effort is appropriate for our community.

Appropriateness of BMPs:

We understand that the EPA is considering changing the monitoring requirements under the next permit. We would strongly oppose this change. We encourage the EPA and DEP to allow flexibility in these requirements because one rule does not necessarily apply to all situations. In previous annual reports, we have described that the visual inspections of the storm outfalls has led to the discovery of two failed septic systems. The annual outfall monitoring has proven to be a valuable tool to locate and prevent illicit discharges in a rural community such as ours. I don't dispute the fact that a large urban system with miles of pipe and drains connected may require additional investigation and testing in order to determine if there is an illicit discharge; however, in a rural storm system with a few hundred feet of pipe and a few catch basins it is much easier to detect if there is a problem. Mandating expensive testing and additional inspections of our outfalls will simply deplete our limited financial resources. The regulations should allow communities the ability to select the appropriate level of inspections to accomplish the task.

In light of the above, we believe that an adequate amount of resources are being invested into detection of illicit discharges. We do not believe this is a significant problem in our system.

A major concern in our system is with erosion and sediment control. Many of the roads do not have curbs. This can be a benefit when using grassed swales for stormwater detention but rural mail carriers driving off the edge of the roads can kill the vegetation which leads to erosion. There are also many gravel driveways in a rural community. Managing these problems is labor intensive. We are trying various methods to deal with these issues. We have paved the shoulders on steeper slopes which are prone to erosion. We have increased the frequency of catch basin maintenance in areas where increased sedimentation is observed. We have also reduced the amount of sand used for winter snow and ice control operations. The local conservation commission and the DPW are pleased to have the new erosion and sediment control regulations in place. We are hopeful that the new regulations will mitigate some of these problems.

As mentioned above, we are very pleased with the work done by the Connecticut River Stormwater Committee. Although it can be difficult to assess the effectiveness of the public education component, we believe that the presentations and work done by this committee are worthwhile. They have provided posters and literature for the member communities in addition to public presentations. For this reason, we plan to continue our membership and financial support of this program.

Progress Toward Achievable Goals:

Specific achievements toward the various BMPs are detailed below and grouped under the individual BMP I. D. number:

- 1) The Storm Water Phase 2 committee has completed a draft of proposed erosion/sediment control and illicit discharge regulations. The proposed regulations have been reviewed by Town Counsel and the Sewer Commissioners. The sewer commissioners have incorporated the proposed regulations into the sewer regulations.
- 3) Troubled waters brochures and posters are available at Town Hall. Posters are displayed at the Police Station and Highway Department. Public outreach is also being accomplished through the Connecticut River Stormwater Committee advertising and presentations.
- 4) The Town of Granby is a member of The Connecticut River Stormwater Committee. This committee is providing outreach towards targeted groups. The DPW opened a waste oil collection center.
- 8) The Board of Selectmen is looking for volunteers to appoint to the Connecticut and Chicopee river watershed councils. We have joined the Connecticut River Storm Phase II Committee. The Highway Superintendent is representing the Town on this Committee.
- 9) Household waste recycling days are held annually.
- 10) The DPW has enlisted the help of the local Girl Scout troop to stencil the catch basins. This work will be ongoing.
- 11) Same as BMP 10. We have also accepted community service volunteers that have been provided through the court system to pick up roadside trash and clean up at the parks.
- 12) The Highway Department has always provided assistance for community cleanups. Also, we promptly try to pick up all large items that are dumped along the roadsides. We try not to let any accumulation occur in order to discourage and mitigate future dumping.
- 13) The Highway Department has purchased a hand held GPS unit and is mapping all storm drains and sanitary sewer systems. We are nearly complete with the mapping process.
- 14) We have delivered paper maps of the stormdrain system to the Police and Fire Departments. We are continuing to work on mapping and organizing the data. We have purchased Arcgis software. Our staff has made significant progress incorporating this data into a GIS system.
- 15) We are continuing to perform annual inspections of the storm outfalls.
- 16) The proposed illicit discharge regulations have been adopted into our sewer regulations. As mentioned previously, we do not believe that the illicit discharge is a significant problem in our system, based on the information currently available.
- 23) The Town has constructed a new DPW building. The new facility has enabled us to greatly improve our maintenance and housekeeping. We hope to begin working on a municipal operation plan in the near future as time allows.
- 24) We have purchased a catch basin cleaner. We have also created a database to better manage the maintenance of the stormdrain system. This has enabled us to substantially increase the number of catch basins that are cleaned each year.
- 25) This year 3 employees attended OSHA 10 hour training sponsored by Baystate Roads Program.
- 26) We have repaired or replaced several deteriorated catch basins and drop inlets. We are beginning to perform preliminary survey work along Easton Street and Carver Street. We intend to incorporate some drainage improvements in these areas in the next few years.

Next Cycle:

The Highway Department will continue to place additional effort in the proximity to any impaired waters such as Aldrich Lake. We will try to increase the frequency of catch basin cleaning in these areas.

As mentioned above, the regulations for illicit discharge and erosion/ sediment control have recently been incorporated into the sewer regulations for the town. The DPW and the local Conservation Commission will be monitoring the effectiveness of the program.

We are very pleased with the work performed by the Connecticut River Storm Phase II Committee. We plan to continue our participation in this committee. We believe that the programs and presentations provided through the Pioneer Valley Planning Commission are an excellent method to engage the public and effectively modify their behavior to improve stormwater quality.

The DPW representatives will continue to attend seminars.

Changes:

As mentioned in previous annual reports, we are very concerned with the lack of funding for roadway maintenance. The costs of asphalt and construction materials have increased exponentially in the last few years. The primary source of revenue for road maintenance in a small town is the "chapter 90" state allotment. This program has been level funded for many years resulting in a net decrease in roadway maintenance due to the significant inflation in materials. Thankfully, the State legislature has changed the requirements of the STRAP (Small Town Roadway Assistance Program) grant. They have increased the maximum population threshold to 7000. Because of this change, the Town of Granby will now qualify for this program. We intend to file an application for the STRAP grant this year. Hopefully, this will allow us to increase the amount of money for roadway maintenance projects next year.

We do not anticipate any significant changes to our stormwater program in the upcoming year. The overall stormwater program appears to be appropriate for our community. We have documented many incremental improvements throughout the current permit cycle. Our intent is to continue on this course and strive for continuous improvement as our funding will allow.

Reliance on Others:

We would like to see an increase in the public participation. We have approached the schools and asked if anyone was interested in starting a stream team cleanup. However, the only group in town that has showed an interest is the Girl Scouts. They have been very active with the stenciling of catch basins. We are hopeful that additional public presentations such as those done through the Connecticut River Stormwater Committee will generate awareness and additional support in the future.

Program Summary:

See chart attached

STORM WATER MANAGEMENT PROGRAM SUMMARY

Mass. Transmittal No. _____

Name: Town Of Gr

EPA No. _____

Date: _____

BMP ID.	BMP	Responsible Dept./Person	Status	Me
Minimum Control Measure 1		Public Education /Outreach		
1	Create a Stormwater Program	Selectmen/DPW/Planning/Health	Stormwater regulations adopted	Present to public draft storm
2	Create a Stormwater Program	Selectmen/DPW/Planning/Health	Stormwater Regulations adopted	Identify sources of assistance
3	Address specific groups	DPW	Brochures available at town hall	Distribute EPA and other rel
4	Target groups likely to impact stormwater	DPW	Joined Conn. River Storm Committee	Brochures targeting specific
5	Identify alternate information	Administrative Assistant/DPW	Stormwater Regulations adopted	Present to public draft of Co Plan
6	Identify alternate information	Administrative Assistant/DPW		Identify funding sources and including education and outreach
7	Utilize local public access channel	DPW	In process/ when appropriate	Public meeting notices and
8	Develop, conduct and document educational programs	Liaison/DPW	Looking for Volunteers Joined Conn. River Storm Committee	Town will appoint a liaison to councils
9	Promote household waste recycling	Board of Health/ DPW	On going annually	Sponsor hazardous waste c
Minimum Control Measure 2		Public Participation		
10	Storm drain stenciling	DPW	Girl Scouts in progress nearly completed	Develop a stencil program.
11	Community clean ups	Conservation commission/DPW	Talked to Schools	Encourage stream team cle
12	Community clean ups	DPW	Always available on request	Provide trucks and support
Minimum Control Measure 3		IDDE		
13	Inventory and Mapping storm drain system	DPW	Proceeding in -house	Identify funding and obtain a
14	Mapping and identification of outfalls and receiving waters	DPW/Assessors	Proceeding in -house	Develop and implement a p
15	Identification/description of problem areas	DPW	annual inspections	Develop and implement an

STORM WATER MANAGEMENT PROGRAM SUMMARY

Mass. Transmittal No. _____

Name: Town Of Granby

EPA No. _____

Date: _____

			ongoing	
16	Enforcement procedures addressing illicit discharges	Planning/Building/Town Council/Board of health	Ongoing	Review whether local authority is appropriate and able to respond to illicit discharges.
17	Public information program regarding hazardous waste and dumping	Board of Health/DPW	Ongoing by Board of Health	Provide educational brochures to residents promoting proper disposal of household hazardous wastes and conditions for regional collections.
18	Initiation of recycling programs	Board of Health/DPW	Ongoing By Board of Health	Apply for funding assistance in public education and recycling materials
19	Watershed assessments and studies	Board of Health/DPW/Conservation		Identify opportunities for assistance to support watershed assessment and implementation activities.
20	Watershed assessments and studies	Board of Health/DPW/Conservation		Encourage cooperation with public drinking water suppliers to develop wellhead protection plans
Minimum Control Measure 4		Construction Runoff Control		
21	Bylaw: Storm water management regulations for construction sites 1 acre or larger	Planning/Conservation/Town Council/Board of health/ZBA	Regulations adopted, Purchased software to manage permits	Review model by law
Minimum Control Measure 5		Post Construction Runoff Control		
22	Bylaw: Require post-construction runoff controls	Planning/Conservation/Town Council/Board of health/ZBA DPW	Regulations adopted	Review model by law
Minimum Control Measure 6		Municipal Good Houskeeping		
23	Develop a municipal operations and Maintenance Plan	DPW	Proceeding as funding allows	Develop and update an operations plan
24	Develop a municipal operations and Maintenance Plan	DPW	Created Maintenance Database	Implement a formal inspection program

STORM WATER MANAGEMENT PROGRAM SUMMARY

Mass. Transmittal No. _____

Name: Town Of Granby

EPA No. _____

Date: _____

25	Develop and implement training programs for municipal employees	DPW	Ongoing	Send employees for training seminars
26	Review Storm drain infrastructure	DPW	On going	Review infrastructure in chapter 90 utilization

Appendix A

CONNECTICUT RIVER STORMWATER COMMITTEE
PROGRESS REPORT
JANUARY 1 TO DECEMBER 31, 2007

The Connecticut River Stormwater Committee joined the Think Blue Coalition in 2007. The Think Blue Coalition is an ad-hoc committee of 24 organizations formed to develop an effective campaign to address water pollution from stormwater runoff. Originally formed in 2006 by the Massachusetts Bays Estuary Program, the Think Blue campaign developed a marketing campaign centered around the "Think Blue" brand. Public outreach materials developed as part of the campaign are available to coalition members. More information about the coalition can be viewed on their website at www.ThinkBlueMA.org.

The campaign is primarily focused on coastal zone of the greater Boston area with the intention of bringing the campaign statewide. The Connecticut River Cleanup Committee and the Connecticut River watershed are the first region to become a member of the coalition outside of the Boston area. Because of this, PVPC has spent some time working with the coalition to tailor outreach materials to the water resources of western Massachusetts and nine communities of the Stormwater Committee. This effort has successfully resulted in the coalition renaming the coalition as Think Blue *Massachusetts* to better meet the needs of all intended partners and regions of the state.

The following is a summary of the work of the Stormwater Committee during the 2007 calendar year:

Member Communities (11)

Agawam, Chicopee, Easthampton, Granby, Holyoke, Longmeadow, Ludlow, South Hadley and Springfield

New members as of December 2007 – West Springfield and Westfield

Comcast Spotlight Cable Television

- Aired 30-second Think Blue PSA during primetime in July, August and September 2007 on CNN, TBS, The Weather Channel, The History Channel, and CNN Headline News

Radio

- Sponsored Live Earth: Concert for a Climate in Crisis – aired live on WRNX 100.9 on July 7, 2007
 - Included 8 30-second commercials, 1 during each 20-minute live cut-in from Live Earth
 - Mentioned in 25 promotional announcements
 - Think Blue logo on wrnx.com
 - 20 additional 30-second commercials airing on the stream at wrnx.com
- Aired 8 week programming with Clear Channel Radio (April – May 2007)
 - 30 commercials per week

- 10 spots from 6am-7pm M-F
- 10 spots 6am -12 midnight Sun-Sat
- 5 Radio Stations:
 1. Zone 640 Sports Radio
 2. WHYN Mix 93.1
 3. KIX 97.9
 4. WHYN News Talk 560
 5. WRNX 100.9 FM

Public Presentations

Chicopee Rotary Club – March 19, 2007

Agawam Lions Club – May 5, 2007

Easthampton rotary Club – May 8, 2007

Ludlow Agricultural Commission – May 17, 2008

Holyoke Rotary Club – May 15, 2007

Mt. Tom Science Day – August 25, 2007 – poster PSA display and “Where do you live in the watershed?” mapping exercise with school-aged children

Granby Lions Club – October 16, 2007

South Hadley Lions Club – November 20, 2007

Website

Maintained website at WWW.ThinkBlueMA.org/ConnecticutRiver

Grants Received

EPA Watershed Initiative Grant \$21,662

PVPC received a roughly \$1 million grant from EPA to perform work related to improving the conditions in the Connecticut River Watershed in Massachusetts, Vermont and New Hampshire. Task B-1 of this grant proposal included funding to support the innovative public outreach programming of the Stormwater Committee. A contract for this grant is expected to be in place by Spring, 2008.

Northeast Utilities Grant \$1,000

This grant is to fund printing costs for the Greenscapes pilot program. This pilot program will be launched in the Spring, 2008 with funding provided by the EPA grant.

Newspaper / Print Media

- Three poster PSAs about reducing fertilizer use, picking up pet waste, and picking up cigarette butts
- Translated posters into Spanish for display at Mt. Tom Science Day, August 25th, 2007.