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Municipality/Organization: Town of Ludlow

EPA NPDES Permit Number: MA041014

MaDEP Transmittal Number: W-036097

Annual Report Number

& Reporting Period: No. 1: May 1, 2003 – April 30, 2004.

5/6/04
Received

NPDES PII Small MS4 General Permit Annual Report

Part I. General Information

Contact Person: Paul Dzubek

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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: Barry Linton

Title: Chairman, Board of Public Works

Date:

5-5-04

Part II. Self-Assessment

The Town of Ludlow has completed the required self-assessment of compliance with the Phase II Stormwater Program. In accordance with the NPDES Phase II Stormwater requirements, the following topics were evaluated for the completion of the Annual Report:

1. Compliance with the Phase II Permit Conditions
2. Appropriateness of the Selected BMPs
3. Progress Towards Achieving the Program's Measurable Goals
4. Results of Any Information that has been Collected and Analyzed
5. Activities for the Next Reporting Cycle
6. Changes in Identified BMPs or Measurable Goals

The Town has determined that our municipality is in compliance with permit conditions except for the following:

1. Evaluation of eligibility for Permit coverage is still pending with respect to endangered species and historic properties. Now that Ludlow has located the system outfalls this investigation will be completed in year 2.
2. Ludlow needs to develop BMPs to more fully address pollutants of concern in 303(d) waters.

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 1 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 2
1a. Revised	Create website links.	DPW	Post links to EPA & DEP stormwater information.	No links yet on the website.	The links will be posted
1b. Revised	Make Stormwater Management Plan available.	DPW	Have Plan copies available at Town Hall, Library, & DPW.	The plan was/is available.	Keep copies of the plan available & current as the program evolves.
1c. Revised	Use Arbor Day for publicity.	DPW	Distribute stormwater information.	A proclamation with a stormwater message was published & posted.	Use this annual event for distribution of stormwater information. Document # of participants.
1d. Revised	Hold a household hazardous waste collection day.	DPW	One collection per year.	A household hazardous waste day was held in September.	Hold a household hazardous waste collection in the fall. Document # of participants
1e. Revised	Cable access.	DPW	Air 4 bulletins per year.	No bulletins were aired on cable.	Air 4 stormwater bulletins on cable.
Revised					

1a. No additions.

2. Public Involvement and Participation

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 1 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 2
2a. Revised	Form a stormwater committee.	Selectmen	Begin meeting	The stormwater committee consisting of 1 member from the Board of Public Works, DPW, Board of Selectmen, Building Commission, Planning Board, Conservation Commission and the Town Administrator has been formed.	The committee will meet at least twice a year.
2b. Revised	Develop storm water bylaws.	Stormwater Committee	Public hearing held.	Model bylaws and existing bylaws were reviewed.	Hold public hearings on draft bylaws.
2c. Revised	Develop a catch basin stenciling program.	DPW	Number of catch basins stenciled.	No basins were stenciled this year because of a shortage of personnel.	Recruit volunteers. Get the stenciling program started. Stencil basins feeding to Chicopee River.
Revised					
Revised					

2a. Additions

2d.	Town meeting consideration of bylaws.	Board of Selectmen	Recorded vote of Town Meeting.	Planned for year 2.	Put draft bylaw on Town Meeting warrant.
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3. Illicit Discharge Detection and Elimination

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 1 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 2
3a. Revised	Draft a drainage system bylaw.	Stormwater Committee	Draft bylaw ready for Town Meeting in year 2.	DPW has reviewed PIP model bylaw.	Examine existing town bylaws & regulations and draft a bylaw.
3b. Revised	Map the MS4.	DPW	Completed map.	Mapping has been completed.	Field verify outfall locations & receiving waters & inspect outfalls.
Revised					
Revised					
Revised					
Revised					

3a. Additions

3c.	Develop & implement a system to find and remove illicit discharges.	DPW	All outfalls checked by end permit term. Misconnections removed recorded. Ongoing rotation of inspections scheduled.		Develop the system & begin screening outfalls.
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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 1 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 2
4a	Develop construction site runoff control bylaw or regulations	Stormwater Committee	Interdepartmental policy in place.	The Stormwater Committee has been formed.	Examine existing construction site controls and inspection/enforcement procedures. Review MS4 General Permit requirements and identify gaps. Draft bylaw or coordinate existing regulations.
Revised					
Revised					
Revised					
Revised					

4a. No additions at this time.

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 1 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 2
5a. Revised	Adopt bylaw.	Stormwater Committee	Prepare for Town Meeting.	The interdepartmental Stormwater Committee has been formed.	Examine existing bylaws and regulations governing post construction stormwater controls. Consider methods to ensure proper operation & maintenance Review MS4 General Permit requirements and identify gaps. Draft bylaw.
Revised					
Revised					
Revised					
Revised					
Revised					
Revised					

5a. No additions at this time.

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 1 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 2
6a. Revised	Clean catch basins.	DPW	Clean all catch basins once per year.	All catch basins were cleaned.	All catch basins will be cleaned.
6b. Revised	Sweep streets	DPW	Sweep all streets	All streets were swept.	All streets will be swept subject to funding.
Revised					
Revised					
Revised					
Revised					
Revised					

6a. No additions at this time.

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 1 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 2
7a.	Map drainage to Minechoag Pond.	DPW	Document drainage to pond & identify all possible sources.	The drainage to Minechoag Pond has been mapped.	
Revised					
Revised					
Revised					
Revised					
Revised					

7a. Additions

7a-1.	Reconstruct drainage to Minechoag Pond from East St.	DPW	Reduce sediment load reaching the pond from a major street via a significant outfall	Plans were drawn and funding secured.	Reconstruct the street and drainage putting catch basins off line.

7b. WLA Assessment

A TMDL has been issued for Minechoag Pond for Phosphorus. It is expected that the reconstruction of the drainage system on East Street will dramatically improve the discharge from Ludlow's outfall to the pond. Catch basins on East Street will be reconstructed as off-line elements of the system. This should reduce the amount of Phosphorus transported into Minechoag Pond by reducing the sediment load.

Part IV. Summary of Information Collected and Analyzed

The program is still in its infancy. No significant amount of information has yet been collected.

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)		
Stormwater management committee established	Yes	
Stream teams established or supported		
Shoreline clean-up participation or quantity of shoreline miles cleaned		
Household Hazardous Waste Collection Days		
▪ days sponsored	1	
▪ community participation	75 cars	
▪ material collected	1,100 gal	
School curricula implemented		

Legal/Regulatory

In Place
Prior to
Phase II Under
Review Drafted Adopted

Regulatory Mechanism Status (indicate with "X")				
▪ Illicit Discharge Detection & Elimination				
▪ Erosion & Sediment Control				
▪ Post-Development Stormwater Management				
Accompanying Regulation Status (indicate with "X")				
▪ Illicit Discharge Detection & Elimination				
▪ Erosion & Sediment Control				
▪ Post-Development Stormwater Management				

Mapping and Illicit Discharges

Outfall mapping complete	90%	
Estimated or actual number of outfalls	Est. 10	
System-Wide mapping complete	90%	
Mapping method(s)		
▪ Paper/Mylar	90%	
▪ CADD	50%	
▪ GIS		
Outfalls inspected/screened		
Illicit discharges identified		
Illicit connections removed		
% of population on sewer	60%	
% of population on septic systems	40%	

Construction

Number of construction starts (>1-acre)		
Estimated percentage of construction starts adequately regulated for erosion and sediment control		
Site inspections completed		
Tickets/Stop work orders issued		
Fines collected		
Complaints/concerns received from public		

Post-Development Stormwater Management

Estimated percentage of development/redevelopment projects adequately regulated for post-construction stormwater control		
Site inspections completed		
Estimated volume of stormwater recharged		

Operations and Maintenance

Average frequency of catch basin cleaning (non-commercial/non-arterial streets)	1 time/yr	
Average frequency of catch basin cleaning (commercial/arterial or other critical streets)	1 time/yr	
Total number of structures cleaned		
Storm drain cleaned		
Qty. of screenings/debris removed from storm sewer infrastructure		
Disposal or use of sweepings (landfill, POTW, compost, recycle for sand, beneficial use, etc.)	Compost	
Cost of screenings disposal		

Average frequency of street sweeping (non-commercial/non-arterial streets)	1 time/yr	
Average frequency of street sweeping (commercial/arterial or other critical streets)	1 time/yr	
Qty. of sand/debris collected by sweeping		
Disposal of sweepings (landfill, POTW, compost, beneficial use, etc.)	Compost	
Cost of sweepings disposal	\$25,000	

Vacuum street sweepers purchased/leased	1	
Vacuum street sweepers specified in contracts	Yes	

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

Anti-/De-Icing products and ratios		% NaCl	
		% CaCl ₂	
		% MgCl ₂	
		% CMA	
		% Kac	
		% KCl	
		% Sand	
Pre-wetting techniques utilized			
Manual control spreaders used			
Automatic or Zero-velocity spreaders used			
Estimated net reduction in typical year salt application			
Salt pile(s) covered in storage shed(s)	Yes		
Storage shed(s) in design or under construction			