

APR 28 2009

Municipality/Organization: Town of Milford, MA

Permit Number: MAR041135

**Annual Report Number
& Reporting Period:** No. 6: March 08-March 09

NPDES Phase II Small MS4 General Permit Annual Report

Part I. General Information

Contact Person: Scott Crisafulli **Title:** Highway Surveyor

Telephone #: 508-473-1274 **Email:** Highway@MilfordMa.com

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: Scott J. Crisafulli

Title: Highway Surveyor

Date: 4-23-09

Part II. Self-Assessment

The Town of Milford has completed the required self-assessment and has determined that our municipality is in compliance with the current permit conditions. Discussions of the progress on BMPs toward the measurable goals, as well as quantification of the various programs, are included in the following sections. This Annual Report is based on the current General Permit being continued, as it expired on May 1, 2008 and a new General Permit had not been issued at the time of preparation. Reference to planned activities in the coming year (“Year 7”) is based on the assumption that the Town of Milford will continue to conduct activities to comply with the current Permit conditions until a new Permit takes effect. If a new Permit is issued for the coming year (May 1, 2009 – May 1, 2010), the Town of Milford may revise the planned activities for “Year 7”, in accordance with the new Permit.

Public Education and Outreach

Milford has met the goals of the BMPs in this category and will continue to provide public education in the form of public presentations, expansion of collection of stormwater materials in the local library and other Town venues (schools, Town Hall), and on the Town website. During this permit year, a general stormwater education presentation with a focus on bacteria was presented to approximately half of the 8th graders (180 students) of Milford Middle School East on March 18, 2009. Stormwater materials were distributed to 6 Milford Schools, as well as the Town Library, Wastewater Treatment Plant, Milford Middle School, and Town Hall. Electronic files of these materials were programmed into the Town of Milford web site. During Permit Year 7, public education will focus on sources of bacteria and phosphorus in the watershed.

Public Involvement and Participation

Annual clean-ups, scrap metal and used motor oil recycling, and semi-annual hazardous waste pickup days are ongoing programs that fulfill this component.

Illicit Discharge Detection and Elimination (IDDE)

Town storm drain mapping was expanded with GPS location of additional storm drain system elements. The existing inventory was evaluated to verify the categorizing of structures. Some elements previously classified as outfalls which are actually culverts were eliminated from the outfall inventory. To date, the following municipal storm drainage system elements have been mapped:

- Outfalls – 270,

- Drop inlets – 31,
- Diversion structures – 2,
- Culverts – 2,
- Manholes – 210,
- Catch basins – 482.

The majority of the system draining to the 36-inch outfall that discharges to the Charles River in the culvert under Main Street was mapped.

During Permit Year 6, the Town conducted work to rehabilitate the Charles River culvert at Central Street, where elevated bacteria levels have been noted in the past by the Charles River Watershed Association (CRWA). This culvert carries the base flow of the Charles River under Central Street and the Archer Rubber factory. It has field stone sides, reinforced concrete top and natural bottom. Years of siltation have caused about 18 inches of sand/gravel/sediment to accumulate in the bottom of this culvert. The accumulated sediment forces the river to flow through the adjacent diversion, leaving stagnant water in the culvert. Work conducted to date has included Phase I, which consisted of removing sediment from downstream of the Archer Rubber factory to the convergence point with the diversion culvert, and Phase II, which consisted of removal of sediment in the culvert under the Archer Rubber building and Central Street. With 100% of completion of Phases I and II, there is a free flow of base river flow of the Charles River through this area for the first time in many years. Funding to complete Phase III (removing sediments upstream of the Central Street and diversion culverts) will be sought, to complete the work during Summer/Fall 2009. In 2008, lower Central Street was addressed with the installation of additional deep sump hooded catchbasins and replacement of the old dirt bottom stone drain with a new concrete or corrugated plastic pipe from North Bow Street to Main Street. Similar repairs were performed on North Bow Street, and the next phase will involve the installation of deep sump hooded catchbasins and drainage system on Jefferson Street, which currently has no stormwater drainage system.

In mid-March of 2008, the Town's consultant reviewed Charles River water quality data provided by Mr. Roger Frymire and discussed sampling locations within Milford with Mr. Frymire. The data showed high levels of pathogens just downstream of the Main Street culvert of the Charles River. On April 24, 2008, the consultant investigated the interior of the Main St. culvert during dry weather and collected representative samples of flowing outfalls or weepholes for pathogens analysis. Three outfalls were located within the culvert and one outfall was located immediately upstream of the culvert. Two of the three interior outfalls were observed to be flowing and were sampled. One of the outfalls (4" iron pipe) showed visible signs of sewage and the Milford Sewer Department was

contacted immediately and responded promptly. The resulting sample exhibited bacterial levels indicative of raw sewage. The Milford Sewer Department subsequently located the pipe's inlet, conducted video inspections, and took corrective actions necessary to eliminate this discharge from the Charles River. The second flowing outfall (36" RCP) exhibited elevated bacterial levels, suggesting the presence of an illicit discharge in the upstream drainage system. This outfall was prioritized for system mapping. The consultant has completed mapping of the majority of the storm drainage system associated with this outfall. In addition, the Milford Sewer Department, working independently to investigate the sanitary sewer system, located three (3) illicit discharges in Main Street within the drainage system for this outfall. They eliminated the sources of two of the illicit discharges, and the Town is currently in legal proceedings against an uncooperative property owner for the third illicit discharge, in accordance with the Town's Stormwater Management By-Law.

In addition to the stormwater IDDE program, the Milford Sewer Department has been and is continually detecting and removing illegal cross connections and making repairs to the sanitary sewer system. This work is part of an effort to remove sources of infiltration/inflow (I/I) to the sewer system that occurs during high groundwater conditions. Currently, excessive I/I during heavy rains and/or snowmelt coincident with high groundwater levels, including inflow from illegal stormwater system connections to the sewer system, results in the surcharging of sewer lines at various locations. These surcharges cause manhole covers to pop open and raw sewage escapes into the MS4 and eventually flows to receiving water bodies. The Sewer Department is progressing on repairs to address these issues. The relief sewer on West Street was increased in size to reduce a surcharging manhole and sewage discharge into O'Brien Brook during rainfall events. Another overflowing manhole was repaired at West and Congress Streets. A total of three collapsed pipes were replaced and one force main break was repaired. The Sewer Department has established a six year schedule for repairs/rehabilitation to the sewer system. In the coming year, all required work in three of the 18 subbasins in Town will be performed, as well as 100 manhole repairs. Maintenance work includes cleaning and flushing of sewers annually or monthly as needed to reduce the frequency, duration and volume of overflows.

Construction Site Stormwater Runoff Control, Post-Construction Stormwater Management in New Development and Redevelopment During this Permit Year, there were 17 Notices of Intent filed with the Milford Conservation Commission and 16 were issued Orders of Conditions. Three (3) of the projects were subject to the Town's stormwater regulation and submitted Operation and Maintenance Plans which are now on file in the Town of Milford's Office of Planning and Engineering. Nine (9) stormwater BMPs are planned for these projects and two (2) have been constructed to date. All new detention/stormwater basins for these projects will be added to the Town's inventory of basin maintenance at the time of public acceptance of the streets.

Pollution Prevention and Good Housekeeping in Municipal Operations

The Town of Milford received MEMA funding to conduct emergency repairs to a portion of the stone masonry channelized sections of Godfrey and O'Brien Brooks. Frequent damage to the aged stone walls results from high flows and contributes to periodic episodes of sediment loading from erosion. The Town is considering alternatives for permanent rehabilitation of the stream channels.

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 6 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 7
PE1 Revised	Brochures to educate public about stormwater pollution, pollution prevention, importance of reporting illicit dumping.	Highway Dept.	Develop brochures in Permit Year (PY) 1. Produce and mail to residents in PY2.	Brochures distributed during PY2. Approximate volume of material removed from catch basins: PY2: 2,400 cubic yards (1598 tons of road sand were purchased by the Town during the previous winter season) PY3: 2,460 cubic yards (2710 tons of road sand were purchased by the Town during the previous winter season) PY4: 3,600 cubic yards (1185 tons of road sand were purchased by the Town during the previous winter season) PY5: 4,500 cubic yards PY6: 342 tons (catch basin and sweepings combined)	Monitor goal of reduction in pollutants in catch basins, observed by catch basin cleaning crews.
PE2 Revised	Brochures to educate business/industry regarding pollution prevention, material storage and handling, housekeeping, disposal practices	Highway Dept.	Develop brochure in PY1. Produce and mail to businesses in PY2.	Brochures distributed during PY2. Approximate volume of material removed from catch basins: PY2: 2,400 cubic yards (1598 tons of road sand were purchased by the Town during the previous winter season) PY3: 2,460 cubic yards (2710 tons of road sand were purchased by the Town during the previous winter season) PY4: 3,600 cubic yards (1185 tons of road sand were purchased by the Town during the previous winter season) PY5: 4,500 cubic yards PY6: 342 tons (catch basin and sweepings combined)	Monitor goal of reduction in pollutants in catch basins, observed by catch basin cleaning crews.

1. Public Education and Outreach cont'd.

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 6 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 7
PE3	Outreach program for local students, civic groups	Highway Dept.	Organize and implement round of presentations for local schools and at least one civic group.	Consultant performed stormwater education PowerPoint presentation for 8 th graders at Milford Middle School East (approximately 180 students) on March 18, 2009.	Continue education campaign about bacterial and phosphorus source issues. Include one (1) public presentation.
Revised					
PE4	Educational material in library	Highway Dept.	Organize a group of materials regarding stormwater pollution and make available at library.	Phosphorus Education poster designed by consultant, focusing on sources and reductions of phosphorus: Materials distributed to 6 Milford Schools, as well as Town Library, Wastewater Treatment Plant, Milford Water Co., and Town Hall in March, 2009. Electronic file of the poster programmed into Town of Milford's Highway Department web site as of April 2009. In general, the web site receives approximately 11,000 hits per month, but it is unknown how many view the stormwater materials.	Add to and update collection of materials, with a focus on bacteria and phosphorus.
Revised	<i>Educational materials in Town Hall and other locations</i>	Highway Dept.	Hang posters and have materials available in Town Hall.		

2. Public Involvement and Participation

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 6 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 7
PP1	Community cleanup	Highway Dept.	Form volunteer group for annual cleanup. Hold cleanup day and record participants.	Cleanups conducted April 14-17 and July 29-31, 2008 by inmate community service group to pick up litter, sweep islands and parking lots, and clear brush and debris from local brooks and roadways. Four to six inmates conducted work on each occasion.	Continue annual cleanup days to reduce amount of debris/trash along waterways and roadways.
Revised					
PP2	Scrap metal and used motor oil recycling	Highway Dept.	Continue to offer recycling program. Record amount of material collected.	Program is ongoing and maintained by the Board of Health. 1,200 gallons of waste/used engine oil collected during calendar year 2008. 2,217 tons of general recyclables recycled in Calendar Year 2008, including 642 tons of scrap metal/white goods.	Continue to offer program and record amounts of materials collected.

2. Public Involvement and Participation cont'd.

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 6 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 7																																																						
PP3	Hazardous waste dropoff days	Highway Dept.	Continue to offer semi-annual dropoff program and record amount of material collected.	<p>Program is ongoing and maintained by the Board of Health.</p> <table border="1" data-bbox="483 1360 776 1728"> <thead> <tr> <th>Item</th> <th>CY 2004</th> <th>CY 2005</th> <th>CY 2006</th> <th>CY 2007</th> <th>CY 2008</th> </tr> </thead> <tbody> <tr> <td>Auto batteries</td> <td>388</td> <td>409</td> <td>367</td> <td>309</td> <td>327</td> </tr> <tr> <td>5-gal pails of household batteries</td> <td>6</td> <td>25</td> <td>5</td> <td>5</td> <td>5</td> </tr> <tr> <td>l.f. of fluorescent bulbs</td> <td>315</td> <td>285</td> <td>375</td> <td>355</td> <td>347</td> </tr> <tr> <td>C.Y. latex/oil based paint</td> <td>15</td> <td>18</td> <td>15</td> <td>15</td> <td>15</td> </tr> <tr> <td>Mercury containing devices</td> <td>1524</td> <td>1497</td> <td>505</td> <td>466</td> <td>371</td> </tr> <tr> <td>lbs electronics</td> <td>4100</td> <td>3779</td> <td>4670</td> <td>5430</td> <td>5742</td> </tr> <tr> <td>Propane Tanks</td> <td>N/A</td> <td>N/A</td> <td>388</td> <td>325</td> <td>385</td> </tr> <tr> <td>Tons Auto Tires</td> <td>N/A</td> <td>N/A</td> <td>2150</td> <td>2120</td> <td>22</td> </tr> </tbody> </table>	Item	CY 2004	CY 2005	CY 2006	CY 2007	CY 2008	Auto batteries	388	409	367	309	327	5-gal pails of household batteries	6	25	5	5	5	l.f. of fluorescent bulbs	315	285	375	355	347	C.Y. latex/oil based paint	15	18	15	15	15	Mercury containing devices	1524	1497	505	466	371	lbs electronics	4100	3779	4670	5430	5742	Propane Tanks	N/A	N/A	388	325	385	Tons Auto Tires	N/A	N/A	2150	2120	22	Continue to offer dropoff program and record amount of material collected.
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Revised				<p>All materials listed above were collected during ongoing material-specific collections open 3 days per week, except for latex/oil based paint. Latex/oil based paint was collected in April through November. In addition to the collections listed above, one comprehensive one-day collection event was held, in which 68 full cars and 10 half cars were served.</p>																																																							

2. Public Involvement and Participation cont'd.

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 6 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 7
PP4	Public meeting	Highway Dept.	Hold public meeting to present proposed bylaw/ordinances for input prior to implementation by end of PY1. ----- Public meeting may also discuss stormwater pollution prevention.	Task completed in PY3.	Task complete.
Revised					

3. Illicit Discharge Detection and Elimination

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 6 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 7
IDD1	Storm Sewer Map	Highway Dept.	Seek Town Meeting funding in PY1. Complete map in PY2.	<p>Outfall mapping completed by consultant August 2004, at cost of \$8,000. A total of 300 outfalls were mapped. 19 additional outfalls have been mapped since that time. During PY4: Additional storm sewer elements associated with 17 outfall systems mapped including approximately 150 storm sewer manholes, 410 catch basins, and 60,000 feet of storm sewer pipe. GPS mapping was completed for storm drain systems associated with 4 high priority outfalls (#153, #148, #69 and #170). During PY5: Additional storm sewer elements associated with 11 outfall systems including approximately 37 storm sewer manholes, 62 catch basins, and 5,372 feet of storm drain pipes. Mapping conducted by consultant at a cost of \$15,000. During PY6: Additional storm sewer elements mapped including 23 manholes, 10 catch basins, and 4,989 feet of storm drain pipes.</p>	Task complete (all outfalls). Continue mapping of complete storm drain system.
Revised					

3. Illicit Discharge Detection and Elimination cont'd.

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 6 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 7
IDD2	IDDE program development, identification of problem areas, correction of issues.	Highway Dept.	Conduct outfall sampling in PY2. Number of illicit discharges to be removed in PY3, 4, 5.	<p>Dry-weather field screening completed by consultant Fall of 2005 and "Dry Weather Outfall Investigation Summary Report" completed November 2005. 303 outfalls were inspected at least once during dry weather.</p> <p>Work conducted to rehabilitate stormdrains within Central St. drainage area and Charles River culvert under Central St. PLEASE SEE PART II, SELF-ASSESSMENT FOR DETAILS.</p>	Obtain funding for Phase III removal of sedimentation at the Charles River culvert at Central Street. Continue IDDE program.
Revised				<p>In April of 2008, Consultant screened 15 outfalls during dry weather. One of the 15 outfalls exhibited slightly elevated surfactants concentration. Consultant contracted to screen 6 additional outfalls during dry weather. Outfalls were inspected on March 25, 2009. Two of the outfalls were flowing and one of the samples exhibited slightly elevated surfactants concentration and conductivity.</p> <p>Consultant conducted field inspection of interior of Main St. culvert of Charles River on April 24, 2008 to investigate the source of high pathogen levels previously measured downstream of the culvert. Samples were collected from outfalls found to be flowing. One outfall was determined to be discharging raw sewage and corrective actions were taken by the Milford Sewer Department. A second outfall was found with elevated bacteria levels and was prioritized for further investigation. PLEASE SEE PART II, SELF-ASSESSMENT FOR DETAILS.</p>	

3. Illicit Discharge Detection and Elimination cont'd.

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 6 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 7
IDD3 Revised	IDDE program documentation.	Highway Dept.	Submit annual report, including information on IDDE program steps.	Annual report is hereby submitted.	Future PY annual reports will include information on IDDE program tasks.
IDD4 Revised	Storm drain stenciling program, focusing on drains tributary to ponds and known dumping areas. Program extended to brook drains as feasible.	Highway Dept.	Percentage/number of storm drains stenciled annually. Records of catch basin cleaning showing decreased dumping/pollutants in catch basins.	All Town storm drains (approximately 3,079) were stenciled in PY3. However, paint is fading in some areas. The Town is considering options for re-labeling catch basins in the future. Approximate volume of material removed from catch basins: PY3: 2,460 cubic yards (2710 tons of road sand were purchased by the Town during the previous winter season) PY4: 3,600 cubic yards (1185 tons of road sand were purchased by the Town during the previous winter season) PY5: 4,500 cubic yards PY6: 342 tons	Task complete.

3. Illicit Discharge Detection and Elimination cont'd.

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 6 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 7
IDD5	Regulation prohibiting non-stormwater discharges to municipal system.	Highway Dept.	Development and implementation of regulation during PY2.	Sections on Prohibition of Illegal Discharges, Prohibition of Illicit Connections, and Waste Disposal Prohibitions included in Stormwater Management bylaw, in effect as of February 9, 2006. Milford Sewer Department traced an illicit discharge to 14 Prentiss Avenue. The property owner was contacted and was uncooperative, refusing to remove the illegal sewer connection from his property to a town storm drain. The District Attorney has subsequently filed charges. A hearing was held in February, 2009 and the defendant asked for and was granted a continuance until May 7, 2009.	Implement bylaw. Work with property owners to remove illicit discharges as needed.
Revised					

4. Construction Site Stormwater Runoff Control

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 6 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 7
CR1 Revised	Regulation for erosion/sediment controls, BMPs, construction controls	Highway Dept.	Development and establishment of regulation.	Stormwater Management bylaw requiring stormwater management permit for construction activities disturbing greater than 1 acre approved at Town Meeting on October 24, 2005. The Stormwater Management bylaw was approved by the Attorney General's Office in letter dated February 9, 2006.	Task complete.
CR2 Revised	Mechanism for site plan review, inspections, review procedures	Highway Dept.	Establishment of procedures and number of plans reviewed annually.	The Stormwater Management General By-Law, adopted on October 24, 2005, requires a Stormwater Permit for any construction activity disturbing greater than 1 acre of land except for projects that are required to file a Notice of Intent (NOI) with the Milford Conservation Commission. Such NOIs must include a fully executed Stormwater Management Form and projects must be designed in full compliance with DEP's Stormwater Management Policy. There were 17 projects which filed NOIs with the Conservation Commission, 16 of which were issued Orders of Conditions. Of these, three (3) projects were subject to the Stormwater Management By-Law and submitted Operation and Maintenance Plans which are on file in the Town of Milford's Office of Planning and Engineering.	Implement bylaw.

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 6 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 7
PCR1 Revised	Regulation for BMPs	Highway Dept.	Develop and adopt regulation, measure compliance (# of BMPs, % compliance, etc).	Nine (9) BMPs planned in association with 3 projects, 2 of which have been constructed. There were no reported violations of the Stormwater Management By-Law associated with BMP requirements.	Continue to implement bylaw.
PCR2 Revised	Regulatory mechanism for BMP operation and maintenance (O&M)	Highway Dept.	Regulation development and adoption; maintenance of inspection reports.	Stormwater Management bylaw approved at Town Meeting on October 24, 2005 includes Operation, Maintenance, and Inspection Schedule requirements for privately-owned facilities, and assigns maintenance responsibility. The Stormwater Management bylaw was approved by the Attorney General's Office in letter dated February 9, 2006. There were 17 projects which filed NOIs with the Conservation Commission, 16 of which were issued Orders of Conditions. Of these, three (3) projects were subject to the Stormwater Management By-Law and submitted Operation and Maintenance Plans which are on file in the Town of Milford's Office of Planning and Engineering.	Continue to implement bylaw.

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 6 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 7
MGH1	Street sweeping	Highway Dept.	Continue street sweeping program, note reduction in sediments in catch basins, quantities of material collected.	Street sweeping conducted March & September of 2008: 342 tons (sweepings & catch basin cleanings combined) collected at cost of \$67,000. All accepted streets (120 miles) and 30 miles of sidewalks were swept.	Continue program through all permit years.
Revised					
MGH2	Catch basin cleanouts	Highway Dept.	Continue catch basin cleanout program. Record number of catch basins cleaned, sediment collected.	The Town conducted annual catch basin cleanouts in July of 2008 using an outside contractor. 3333 catch basins were cleaned and a total of 342 tons (sweepings & catch basin cleanings combined) of material removed. Total cost of \$41,479.	Continue program through all permit years.
Revised					
MGH3	Record keeping/schedule of maintenance	Highway Dept.	Continue to keep listing of regular maintenance activities, schedules, and procedures.	Records added to maintenance file.	Continue to maintain records and update program as needed.
Revised					
MGH4	Recycling and waste disposal program	Highway Dept.	Continue recycling and waste disposal program for municipal operations. Record quantities involved in program.	Program ongoing. 3,000 yds of mulched lawn waste collected in Fall of 2008 from 120 miles of Town streets at cost of \$41,194. 1,877 tons of yard waste collected during calendar year 2008 (from Board of Health); 368 Christmas trees collected.	Continue program through all permit years.
Revised					

6. Pollution Prevention and Good Housekeeping in Municipal Operations cont'd.

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 6 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 7
MGH 5 Revised	Waste disposal/housekeeping training and practices	Highway Dept.	Continue proper disposal procedures, conduct training, keep logs of material disposal.	Capital Environmental performed a two hour class outlining good housekeeping training and practices related to vehicle equipment fueling, waste ban regulations, waste water, drinking water, storm water, and emergency preparedness to 12 highway department employees on April 21, 2009. 994 gallons of oil/water and 11 drums of oily sand & sludge removed from oil/water separator at the Highway Department Garage in February and September, 2008, at a total cost of \$12,362.	Continue program through all permit years.
MGH 6 Revised	Identification, inspection, maintenance of Town owned BMPs	Highway Dept.	Inspection and maintenance of structures, maintain records.	<ul style="list-style-type: none"> Godfrey Brook inlet grates cleaned at Water Street and Hospital Brook on 28 occasions from February 2008 to March 2009. Deteriorating stone walls repaired/replaced along 100 ft of Godfrey Brook at Congress Terrace, at a total cost of \$62,608. 1,075 ft of drainpipe installed and 40 ft replaced from June to October 2008. 34 catch basins or manholes repaired/replaced from June – October 2008. 1 new catch basin installed September, 2008 	Perform recommended maintenance activities on detention basins. Continue program.

Part IV. Summary of Information Collected and Analyzed

The quantities of materials accepted by the Town's recycling programs are recorded by the Board of Health and have been included in the following section.

Part V. Program Outputs & Accomplishments

Education, Involvement, and Training

	(y/n)	YES
Stormwater education materials collected and available at library		
Clean-up days held	(#)	2
Household Hazardous Waste Recycling		
▪ material collected (automotive waste oil)	(gal)	1200
▪ material collected (household paint)	(gal)	3030
▪ annual recycling (January 2008 - December 2008 (inclusive))	(tons)	1475

Legal/Regulatory

	In Place Prior to Phase II	Existing Regs Reviewed	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 (partly)			X
▪ Post-Development Stormwater Management				X

Mapping and Illicit Discharges

Number of outfalls mapped to date	(#)	281
Estimated or actual number of outfalls	(#)	282
Mapping/Survey method(s)	type	GPS and CAD/GIS
Outfalls inspected/screened during dry weather	(#)	276 (98%)
Estimated % of population on sewer	(%)	80
Estimated % of population on septic systems	(%)	20
Outfalls identified for further investigation	(#)	24 (9%)
Outfall drainage systems mapped (complete or partial)	(#)	25 (9%)
Illicit discharges traced	(#)	8
Illicit discharges removed	(#)	5

Operations and Maintenance

Average frequency of catch basin cleaning (non-commercial/non-arterial streets)	(times/yr)	1
Average frequency of catch basin cleaning (commercial/arterial or other critical streets)	(times/yr)	1
Total number of structures cleaned	(#)	3333
Total amount of material removed from structures	(tons)	342
Disposal or use of sweepings (landfill, POTW, compost, recycle for sand, beneficial use, etc.)		registered landfill
Disposal of yard waste		Composted and used by Parks and Highway Dept.
Average frequency of street sweeping (non-commercial/non-arterial streets)	(times/yr)	2
Average frequency of street sweeping (commercial/arterial or other critical streets)	(times/yr)	2

Disposal of sweepings (landfill, POTW, compost, beneficial use, etc.)	(location)	registered landfill
Anti-/De-Icing products	material	NaCl and limited CaCl ₂
Salt pile(s) covered in storage shed(s)	(y/n)	Yes