

Municipality/Organization: Town of Milford, MA

Permit Number: MAR041135

Annual Report Number

& Reporting Period: No. 8: March 10-March 11

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: Scott J. Crisafulli

Printed Name: Scott J. Crisafulli

Title: Highway Surveyor

Date: 4-30-11

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 permit conditions. Discussions of the progress on BMPs toward the measurable goals, as well as quantification of some of the programs, are included in the following sections. This Annual Report is based on the current General Permit being administratively continued, as it expired on May 1, 2008 and a new General Permit had not been issued at the time of preparation of this report. Any reference to planned activities in the coming year ("Year 9") 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 takes effect within the coming year (May 1, 2011 – May 1, 2012), the Town of Milford may revise the planned activities for "Year 9", 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 presentations, expansion of collection of stormwater materials in the local library and other Town venues (schools, Town Hall), and postings on the Town website. During this permit year, a general stormwater education presentation with a focus on phosphorus and bacteria was presented to most of the 8th graders (about 285 students) of Milford Middle School East on April 15, 2011. Stormwater education materials were distributed to 6 Milford Schools, as well as the Town Library, Wastewater Treatment Plant, Milford Water Co., and Town Hall. Electronic files of these materials were provided to the Town of Milford Chief Technology Officer on April 21, 2011 for posting on the Town's web site. During Permit Year 9, public education will continue to 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 to fulfill this component.

Illicit Discharge Detection and Elimination (IDDE)

The Town has communicated with a surveyor to provide a budget for complete mapping of the storm drain system. With budget constraints and other priorities, the Town has decided to postpone the appropriation of funding for mapping purposes until after the new MS4 permit is issued.

During Permit Year 8, the Town completed the sediment dredging of the Charles River near the 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. Approximately 1,320 tons of sediment were removed between November 29 and December 2, 2010. The material was slightly contaminated and was therefore disposed at an approved landfill in Upton, MA with an associated cost of \$23,564.14. The culverts that were previously partially blocked are now open to allow free flow of water. The Prospect Heights Phase I project included the installation of a new storm drainage system that included deep sump catch basins and oil/debris separators.

In August, 2010, nineteen (19) outfalls which discharge to the Charles River between the Milford Pond dam and Central Street were screened during dry weather. Of those outfalls screened, one (1) outfall, a 36-inch RCP on the western side of the culvert under Main Street, was observed to be flowing and a sample was collected. Results indicated an enterococcus concentration of 1,500 colonies per 100 mL, and therefore the Sewer Department has been requested to investigate the drainage system connected to this outfall. Previous illicit discharges connected to this drainage system have been removed (see Annual Report No. 7), however, further investigations are being conducted to determine the source of this persistent enterococcus concentration. The Sewer Department has narrowed the potential source down to two locations: one area on Main Street and another on Spruce Street. Detection is proving challenging, thus the Town is seriously considering the purchase of a closed circuit camera to use for detection of the source of this illicit discharge and for future efforts. No additional illicit discharges were found during this permit year.

Construction Site Stormwater Runoff Control, Post-Construction Stormwater Management in New Development and Redevelopment
During this Permit Year, there were 12 Notices of Intent filed with the Milford Conservation Commission and 12 were issued Orders of Conditions. Four (4) of the projects were subject to the Town's Stormwater By-law and submitted Operation and Maintenance Plans which are now on file in the Town of Milford's Office of Planning and Engineering. A total of five (5) stormwater BMPs were constructed in association with the four (4) projects. There were no reported violations of the Stormwater By-law.

Pollution Prevention and Good Housekeeping in Municipal Operations

The Town has begun the design and permitting process for permanent rehabilitation of the stone masonry channelized sections of the Godfrey and O'Brien Brooks stream channels. Frequent damage to the aged stone walls results from high flows and contributes to periodic episodes of sediment loading from erosion. The project has been included in the Environmental Bond bill but those funds for construction will not be released until Fiscal Year 2012, and after the Town has completed design and permitting. In the meantime, the Town has begun the design and permitting for Phases I and II. To date, preliminary design is almost complete for Phase I and survey work is almost complete for Phase II.

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 8 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 9
PE1	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) PY7: 1,600 cubic yards (catch basin and sweepings combined) PY8: 1,515 cubic yards	Monitor goal of reduction in pollutants in catch basins, observed by catch basin cleaning crews.
Revised					

1. Public Education and Outreach cont'd.

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 8 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 9
PE2	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) PY7: 1,600 cubic yards (catch basin and sweepings combined) PY8: 1,515 cubic yards	Monitor goal of reduction in pollutants in catch basins, observed by catch basin cleaning crews.
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 285 students) on April 15, 2011.	Continue education campaign about bacterial and phosphorus source issues. Include one (1) public presentation.

1. Public Education and Outreach cont'd.

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 8 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 9
PE4	Educational material in library	Highway Dept.	Organize a group of materials regarding stormwater pollution and make available at library.	Poster "Infiltrate Stormwater" designed by consultant: Materials distributed to 6 Milford Schools, as well as Town Library, Wastewater Treatment Plant, Milford Water Co., and Town Hall in April, 2011. Electronic files of these materials were provided to the Town of Milford Chief Technology Officer on April 21, 2011 for posting on the Town's web site. 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 8 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 9
PP1	Community cleanup	Highway Dept.	Form volunteer group for annual cleanup. Hold cleanup day and record participants.	Cleanups conducted April 26-30 by inmate community service group to pick up litter along roadsides and culverts. Six inmates per day conducted work on each occasion. The Charles River Earth Day Cleanup Steering Committee held its 12 th Annual Earth Day Charles River Watershed Cleanup Event during the weekend of April 16-17, 2011. This event involved 200 volunteers collecting trash at over 40 sites throughout the Upper Charles River watershed, including three sites within Milford.	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. Waste/used engine oil is collected year round. 1 or 2 collection days were held to collect used oil filters and antifreeze. 2,223 tons of general recyclables recycled in Calendar Year 2010, including 649 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 8 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 9																																																															
PP3	Hazardous waste dropoff days	Highway Dept.	Continue to offer semi-annual dropoff program and record amount of material collected.	Program is ongoing and maintained by the Board of Health. <table><tr><th>Item</th><th>CY 2004</th><th>CY 2005</th><th>CY 2006</th><th>CY 2007</th><th>CY 2008</th><th>CY 2009</th></tr><tr><td>Auto batteries</td><td>388</td><td>409</td><td>367</td><td>309</td><td>327</td><td>310</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><td>6</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><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><td>18</td></tr><tr><td>Mercury containing devices</td><td>1524</td><td>1497</td><td>505</td><td>466</td><td>371</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><td>5530</td></tr><tr><td>Propane Tanks</td><td>N/A</td><td>N/A</td><td>388</td><td>325</td><td>385</td><td>391</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><td>19</td></tr></table> In 2010, all materials listed above were collected year round, except for used oil filters, antifreeze, and latex/oil based paint. Used oil filters and antifreeze were collected during 1 or 2 collection days, while latex/oil based paint was collected monthly. In addition to the collections listed above, one comprehensive hazardous product one-day collection event was held. The amounts were not reported.	Item	CY 2004	CY 2005	CY 2006	CY 2007	CY 2008	CY 2009	Auto batteries	388	409	367	309	327	310	5-gal pails of household batteries	6	25	5	5	5	6	L.f. of fluorescent bulbs	315	285	375	355	347	347	C.Y. latex/oil based paint	15	18	15	15	15	18	Mercury containing devices	1524	1497	505	466	371	371	lbs electronics	4100	3779	4670	5430	5742	5530	Propane Tanks	N/A	N/A	388	325	385	391	Tons Auto Tires	N/A	N/A	2150	2120	22	19	Continue to offer drop off program and record amount of material collected.
Item	CY 2004	CY 2005	CY 2006	CY 2007	CY 2008	CY 2009																																																														
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2. Public Involvement and Participation cont'd.

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 8 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 9
PP4	Public meeting	Highway Dept.	Hold public meeting to present proposed by/law/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 8 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 9
IDD1	Storm Sewer Map	Highway Dept.	Seek Town Meeting funding in PY1. Complete map in PY2.	Outfall mapping completed by consultant August 2004, at cost of \$8,000. Additional storm sewer elements have been mapped in Project Years 4, 5, 6.	Task complete (all outfalls).
Revised					
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.	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. Charles River sediment dredging project completed and Prospect Heights drainage system installed. PLEASE SEE PART II, SELF-ASSESSMENT FOR DETAILS. Dry weather screening of 19 outfalls conducted. PLEASE SEE PART II, SELF-ASSESSMENT FOR DETAILS. Annual report is hereby submitted.	Continue IDDE program.
Revised					
IDD3	IDDE program documentation.	Highway Dept.	Submit annual report, including information on IDDE program steps.		Future PY annual reports will include information on IDDE program tasks.
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 8 (Reliance on non-municipal partners indicated, if any)	Planned Activities -- Permit Year 9
IDD4	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 PY7: 1,600 cubic yards (catch basin and sweepings combined) PY8: 1,515 cubic yards	Task complete.
Revised					
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.	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 8 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 9
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. During this Permit Year, there were 12 Notices of Intent filed with the Milford Conservation Commission and 12 were issued Orders of Conditions. Four (4) of the projects were subject to the Town's Stormwater By-law and submitted Operation and Maintenance Plans which are now on file in the Town of Milford's Office of Planning and Engineering. A total of five (5) stormwater BMPs were constructed in association with the four (4) projects. There were no reported violations of the Stormwater By-law.	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 8 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 9
PCR1	Regulation for BMPs	Highway Dept.	Develop and adopt regulation, measure compliance (# of BMPs, % compliance, etc).	Five (5) BMPs constructed in association with 4 projects. There were no reported violations of the Stormwater Management By-Law associated with BMP requirements.	Continue to implement bylaw.
Revised					
PCR2	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. During this Permit Year, there were 12 Notices of Intent filed with the Milford Conservation Commission and 12 were issued Orders of Conditions. Four (4) of the projects were subject to the Town's Stormwater By-law and submitted Operation and Maintenance Plans which are now on file in the Town of Milford's Office of Planning and Engineering. A total of five (5) stormwater BMPs were constructed in association with the four (4) projects. There were no reported violations of the Stormwater By-law.	Continue to implement bylaw.
Revised					

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 8 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 9
MGH1	Street sweeping	Highway Dept.	Continue street sweeping program, note reduction in sediments in catch basins, quantities of material collected.	Street sweeping conducted March 30 through December 5 of 2010: 925 tons collected at labor cost of \$38,445.20. In addition, a regenerative air sweeper was purchased at a cost of \$197,000. All accepted streets (120 miles) were swept twice, while main roads were swept multiple times.	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 June through July of 2010 using an outside contractor. 3368 catch basins were cleaned and a total of 1,515 cubic yards of material removed. Total cost of \$42,066.32.	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. 9,000 cubic yds of mulched lawn waste collected in Fall of 2010 from 120 miles of Town streets at cost of \$41,000. 400 Christmas trees and 1500 tons of yard debris 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 8 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 9
MGH 5	Waste disposal/housekeeping training and practices	Highway Dept.	Continue proper disposal procedures, conduct training, keep logs of material disposal.	HazCompliance, LLC performed a hazardous materials training class to 13 highway department employees in June, 2010. 2,110 gallons of oil/water were removed from two oil/water separators at the Highway Department Garage on 3-26-10, 3-27-10 and 12-2-10, 12-3-10, at a total cost of \$14,243.61.	Continue program through all permit years.
Revised					
MGH 6	Identification, inspection, maintenance of Town owned BMPs	Highway Dept.	Inspection and maintenance of structures, maintain records.	16 stormwater structures were rebuilt 1360 feet of drain pipe installed (7 separate installations) 47 stormwater structures repaired - Work conducted March –November 2010 - Total budget expense of \$77,000.	Perform recommended maintenance activities on detention basins. Continue program.
Revised					

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

Stormwater education materials collected and available at library	(y/n)	YES
Clean-up days held	(#)	2 events/ 7 days
Household Hazardous Waste Recycling		
▪ material collected (automotive waste oil)	(gal)	Not reported
▪ material collected (household paint)	(gal)	Not reported
▪ annual recycling (January 2010 - December 2010 (inclusive))	(tons)	2223

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	(#)	282 (100%)
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	(#)	6

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	(#)	3368
Total amount of material removed from structures	(cubic yards)	1,515
Disposal or use of sweepings (landfill, POTW, compost, recycle for sand, beneficial use, etc.)		registered landfill
Disposal of yard waste		Composted and used by Public, Parks, and Highway 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)	3

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