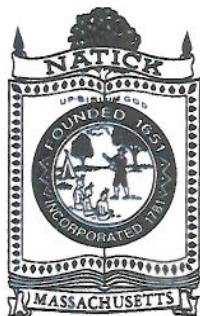


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NPDES PII Small MS4 General Permit Annual Report

Municipality/Organization: Town of Natick, Massachusetts
EPA NPDES Permit Number: MAR041139
MassDEP Transmittal Number: W-035570
**Annual Report Number
& Reporting Period:** Report No. 7: May 1, 2009 – April 30, 2010

Part I. General Information

Contact Person: Mark Coviello, P.E. **Title:** Town Engineer
Telephone #: 1-508-647-6551 **Email:** mcoviello@natickma.org
Mailing Address: 75 West Street, Natick, MA 01760

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: Martha White
Printed Name: Martha White
Title: Town Administrator
Date: April 15, 2010

Part II. Self-Assessment

The Town of Natick has completed the required self-assessment and has determined that our municipality is in substantial compliance with all permit conditions. Although we are not required to assess ourselves in regards to the BMP implementation, goals and schedule within this section, the Town would like to note that due to staffing and budgetary constraints during the stormwater management program, our plan of action had to be modified and schedules shifted. During that time, the Department of Public Works (the department responsible for the implementation of the NPDES Permit for the Town) lost their Stormwater Coordinator and numerous members of the Highway Department (one of the divisions tasked with assisting the Engineering Division with managing the program) and the positions were not filled (due to budget cuts). The duties of these positions were distributed to other personnel within the Department of Public Works and Community Development, but with the staffing and budgetary constraints, both departments are operating beyond their means. The Town of Natick was still committed to meeting all requirements of their permit, and believes that they have substantially completed all the required tasks set forth within the program.

Even with the budget cuts and staffing issues, the Natick Stormwater Committee has been pro-active in trying to ensure that all the scheduled tasks were completed by the end of the Permit and have gone as far as to revise their plans on multiple occasions during the past few years. Although many of the tasks were already completed prior to this report, continued implementation and upgrading has been a focus for the Town to make sure that they are remaining compliant with the scope and intent of the stormwater permit. One such item that the Town has been continuing to work on is BMP 6-3 (Investigate Town Owned BMP's for Retrofit Opportunities). Although this item was completed during Year 4 of the permit, the Town is always looking for opportunities to retrofit our infrastructure to include BMP's that will upgrade the drainage system to be more in line with the requirements of the EPA. During a recent two year roadway reconstruction project on three of the largest roadways in Natick, the Town performed extensive drainage work on these roadways which included the replacement and installation of 36 drain manholes, approximately 3,800 feet of RCP piping and 45 deep sump catch basins (with hoods). The Town also requires new developments to incorporate structural BMP's into their storm drainage designs.

The Town was very active in regards to locating and mapping our storm drainage system during the stormwater permit. The town was not only active in mapping the locations of our outfalls but also other drainage structures including pipes, catch basins, etc. (which was not required under this permit). These structures were located using GPS technology which has allowed the town to produce 40 scale drawings which the Town can use in cases of emergency or problems with the storm drainage system or to assist the Town in marking out the storm drains for contractors performing excavation work near the system. Knowing the locations of the storm drainage pipes and structures will minimize the likelihood that contractors will damage our storm drainage system during their excavation work thus protecting water bodies downstream. During the subsequent stormwater permit, the mapping of all drainage structures will be required (subject to change in the final permit). The Town is ahead of the curve in this item but will work to ensure that the present information is correct as well as obtaining the remaining information. The Town is looking to acquire a scanner that will aid this department in taking older drainage information that is only in paper form and putting it into an

electronic format where it can be cross-referenced to ensure that all drainage information is in the Town's GIS mapping system.

As of the writing of this report, 505 outfalls have been identified in our system. This includes both town owned and maintained outfalls as well as outfalls in subdivisions that are not currently under the control of the Town but will ultimately be. Of the 505 outfalls, approximately 15 remain to be located using GPS. The locations of these outfalls are generally known; however due to terrain and safety issues, we are unable to locate these outfalls. We are still working to record the locations of these structures but it is unclear if this will be possible. 446 of the 505 outfalls have been fully inspected and entered into our database. The majority of the remaining 59 outfalls have been inspected during field location work; however follow-up detailed inspections and data entry into our database remain. It is important to note that there are many areas where the state drainage system discharges into the Town of Natick (Portions of Speen Street, Route 135, Route 9, Mass Pike). Although GIS information on their system has been requested by the Town, the state has not given the Town any of this information. This is being mentioned to detail our concern that no matter how much work the Town performs to limit contaminants into our drainage system, there are other entities that are impacting our system beyond the town's control.

The town has also been very active in locating and inspecting culverts within the Town as well which is beyond the scope of this BMP, but it is the feeling of the Town that identifying the entire system as a whole (and all its components) is vitally important to ensuring that the system is managed and maintained in the best possible fashion. Presently 181 culvert inlets and 98 culvert outlets have been identified in our system. Of these, 173 of the 181 inlets and 96 of the 98 outlets have been fully inspected and entered into our database.

Part III. Summary of Minimum Control Measures

1. Public Education and Outreach

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 7 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Future Years
1-1	Website Modifications	Department of Public Works	Update Website with • New Info • New Contacts • New Links Continue monitoring the website to ensure that it is up to date and current including all links.	During Year 7 (as in past years), the Town's Stormwater Management Website was reviewed to ensure that the residents have a very user-friendly experience. Contact information and links were verified and new information was added and out of date information was removed from the site.	To ensure that this site is effective, it will be reviewed on a regular basis to make sure that information is current and that links are working. If new information is available that may be useful to residents, it will be included within the website. The assumption is that this task will be continued under the 2010 permit under review by EPA.
1-2	Storm Water Flyer to Community Residents	Engineering Department	Distribute flyer to 75% of Natick Residents; Compile and Consider "Survey" results	No work performed for this BMP during Year 7. The flyer was created and distributed to residents during Year 1.	Goal Completed No future work is planned for this BMP.
1-3	Storm Water Lesson Plan for Fifth Grade Students	Engineering Department	Develop and Distribute lesson plan for Grade 5 level (Use plan to teach 1 or more Grade 5 classes)	No work performed for this BMP during Year 7. The lesson plan was developed, distributed and taught to fifth graders during Year 2 of the permit.	Goal Completed No future work is planned for this BMP.
1-4	Storm Water Flyer to Community Businesses	Engineering Department	Distribute flyer to a minimum of 50% of Natick Businesses, Storm Water Log displayed by half of the businesses receiving the flyer	At the end of Year 4, the Town worked with the SuAsCo Watershed Council to develop a storm water flyer to be sent to community businesses. We received the flyers in March 2007. The town mailed out these flyers to over 50% of Natick Businesses during Permit Year 5. No work performed for this BMP during Year 7.	Goal Completed The town will keep these flyers available for whatever business or resident requests them and will continue to work with the residents and businesses of Natick to educate them about keeping their storm water clean.

1-5	Storm Water Media Campaign	Engineering Department	Deliver media information packet to the local media, Issue 4 press releases to local and major media outlets and major media outlets	No work performed on this BMP during Year 7. Informational packets were delivered to media (local and major) outlets during Year 3 of the permit.	No future work is planned for this BMP.
1-6	Storm Water Video	Engineering Department	Show Storm Water Video at a minimum of 1 public meeting, and air Storm Water Video at least once on the local cable channel	The Stormwater Infomercial that was developed during Year 5 of the program and showcased during Year 6 was still being shown on Natick Pegasus (The local access station). During Year 7, a new infomercial was also created and broadcast that dealt with Green and LID practices.	Goal Completed The Town will continue to work with the local cable channel to ensure that these mini infomercials are being shown at certain timeframes. Also it has been discussed that a follow-up interview by a member of the Stormwater Committee may occur to discuss Stormwater more in depth.
Revised	Storm Water Infomercials	Engineering Department	Take postcards created under the revised BMP 2-7 and turn them into mini infomercials on the local cable channel to increase awareness of storm water issues both locally and in general		Goal Completed

2. Public Involvement and Participation

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 7 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Future Years
2-1	Storm Water Committee	Stormwater Committee	Establish a Stormwater Committee, Hold Quarterly meetings at a minimum	The Stormwater Committee was established during Year 1 of the permit. The Stormwater Committee met on a regular basis during this past year (Year 7) of the permit.	The Stormwater Committee will continue to meet as regularly as possible to ensure that the storm water issues of the Town are being addressed and discussed. Also, with the 2010 draft permit under review by EPA, the Stormwater Committee will be meeting to determine the impacts this will have on the town and how best to deal with them.
					Ongoing Implemented Program

2-2	Community Hotline	Department of Public Works	Establish a Hotline; Residents Use Hotline and Phone calls indicating suspicious activities are investigated	During Year 7 of the permit, the hotline remained an important part of the Stormwater program. The Hotline phone numbers and email addresses of appropriate contacts in cases of flooding, illicit discharges and construction concerns were checked to ensure that they are active to allow resident to continue to report suspicious activity and storm water concerns.	The Town will continue to monitor the hotline to determine the best possible way to ensure that residents can report suspicious activity in an effective way. If modifications need to be made to how this is done, the Town will update accordingly.
2-3	Stormwater Traveling Display	Department of Public Works	Storm Water Display circulates around Natick for at least 3 months; Display is Posted at a minimum of 3 different public locations; Posted in public places or at storm water events	The traveling display was purchased during Year 1 of the permit with an additional display being purchased during Year 4. Since its purchase the original display has been located primarily at the Department of Public Works year round. During special events (Town Meeting, Storm Water events, etc), the additional display has been set for viewing by the residents or other attendees of the meeting.	Goal Completed The Town will continue bringing the stormwater display to town-wide events and other gatherings where it will be seen by a large number of residents at one time.
Revised		Stormwater Committee	Purchase Additional Traveling Display		
2-4	Storm Water Poster Contest for 5 th Grade Students	Department of Public Works	Hold poster Contest, receive entries and judge submissions	No work was planned for this BMP during Year 7.	Goal Completed No future work is planned for this BMP.
2-5	Storm Water Photo Contest for High School Students	Department of Public Works	Hold Photo Contest, receive entries and judge submissions	This BMP was changed in Year 4 to be a storm drain marking kit. The kits were received in the end of Year 4 and were used by a couple groups (girl scouts) during Year 5 to help educate not only themselves but also their neighborhoods on not dumping anything down their catch basins. Additional groups (watershed groups and middle schools) have inquired about the kits and they will be used during the end of Year 7 and beyond.	Goal Completed The Stormwater Committee will continue to work to determine the best way to implement this task and get more community groups involved with this BMP.
Revised	Storm Water Drain Marking Kit	Department of Public Works	Install labels on approximately 200 catch basins		

2-6	Hold a Local Storm Water Summit	Stormwater Committee	Hold community storm water summit and advertise to encourage community attendance	No work performed for this BMP during Year 7. The summit was coordinated and held during Year 3 of the permit schedule.	Although this task is complete, the town is always looking for possibilities to build on this item. The Town has been working with the Lake Cochituate Watershed Council on a Spring Symposium to be held just after the end of Permit Year 7 that will focus on stormwater, BMP's, Community involvement, etc. Goal Completed/Ongoing Implemented Program
2-7	Participate in SuAsCo Storm Water Super Summit and Conduct an Evaluation and Assessment of Public Awareness of Storm Water	Engineering Department	Participate in Storm Water Super Summit; Storm Water Self Test distributed to a minimum of 75% of Natick residents, Compile and consider "Self Test" Results	During Year 6, the Town worked with SuAsCo to create postcards that focused on "Green" initiatives and what each resident could do. Also, a survey was created to test the resident's Stormwater IQ. During Year 7, these postcards were made available to all town residents as well as putting them on the town website so that residents can learn about green initiatives.	The Town will continue to work with SuAsCo and other organizations to come up with new and innovative ideas to educate the residents and businesses within Natick on stormwater and new technologies and ideas that can help people on an "every day basis" deal with stormwater.
Revised	Storm Water Postcards	Engineering Department	Create specially designed postcards and send them out via tax bills to all the residents in Natick		Ongoing Implemented Program

3. Illicit Discharge Detection and Elimination

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 7 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Future Years
3-1	Illicit Discharge Bylaw	Board of Health/Engineering	Develop Illicit Discharge Bylaw and Present it to Town Meeting	No work was performed for this BMP during Year 7. The Department of Public Works and the Conservation Commission will work together to continue implementing the bylaws, rules, and regulations set forth as part of this BMP.	No work is planned for this BMP in the future.
			Goal Completed	Goal Completed	Goal Completed

3-2	Inspect and Sample Town Discharges	Engineering Department	Inspect all Town Discharges; Identify outfalls that indicate potential sewerage or illicit discharges; If Schedule and budget allows, conduct follow-up testing and inspection at discharges with the potential of illicit discharges and/or sewage contamination	The DPW has focused a large amount of resources on completing the inspection of all town outfalls. Budget constraints and loss of the storm water coordinator for the town have made it harder to complete, but the DPW personnel have been working hard to locate and inspect all the outfalls. As of the writing of this report, 446 of the 505 outfalls have been FULLY inspected and entered into our database. The remaining 59 have been inspected during field location work; however, follow-up detailed inspections and data entry remain. The next permit from EPA is going to stress testing of the outfalls during both dry and wet weather. The Town will use the information collected during the initial permit to assist us in better inspecting and analyzing the data collected during the next permit cycle.
3-3	System Mapping and Evaluation	Department of Public Works	Complete system map, structures, pipe databases and coverages; Locate all known discharges with GPS; Conduct Hydraulic modeling of flood prone areas; Add soils and land use to base mapping; Map septic system and provide pumping history	Ongoing Implemented Program It is anticipated that by the end of the current permit year, all outfalls that CAN be located will have been located. However, there will still be outfalls that the Town is unable to locate due to field conditions and/or access (as previously mentioned). Hydraulic analysis/modeling of flood prone areas, using the drainage mapping will continue through the end of the current calendar year. The draft permit from the EPA stresses mapping of the entire drainage system. The Town will be "ahead of the curve" in that task but will continue to work to cross reference our information to make sure our drainage information is as correct as possible. Ongoing Implemented Program

3-4	Illegal Dumping Education	Stormwater Committee	Educate the public on the hazards of illegal dumping	In conjunction with the educational BMP's listed above, the Stormwater Committee has been continuing to educate the residents of Natick of the hazards of illegal dumping. This education has come in the form of the flyers to residents and businesses, the summit held in Year 3, the Marking Kit program implemented in Year 4, the Stormwater Traveling Display, and the inclusion of the Town of Natick Stormwater Management Plan on the town website. During Years 5 through 7, this education of the residents continued and will continue into the future.	The town is going to continue its efforts of educating residents on the hazards of illegal dumping. This will be done by using all the materials that were obtained by the Town for Permit Years 1 through 7. The town will continue to stress the importance of not dumping illegal and hazardous materials into Natick's storm drain system.
3-5	Septic System Controls	Board of Health	Mandate Septic System Maintenance; Create database to track maintenance activities; Update database based on new septic system information	The septic system database is up and running and data entry has been completed; however, the Board of Health is still trying to work with a consultant to help them with the reporting capabilities of the database and this work has not been fully completed. The original consultant that they used is being non-responsive in working with them to update the database to better utilize reporting capabilities. The Board of Health is not sure when they will be able to get this finished which is holding up finalizing of their proposed septic system regulations for approval by the Town.	Goal Completed The Board of Health will continue to update and improve the septic system maintenance database. As soon as the database reporting capabilities are worked out with the consultant, the town will work on submitting Septic System Regulations for adoption by the Town. These new regulations will reduce system failures over time by assuring/ mandating system maintenance, effectively reducing the pollution and public health nuisances associated with such failures. Ongoing Implemented Program

4. Construction Site Stormwater Runoff Control

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 7 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Future Years
4-1	Soil and Erosion Control Bylaw	Conservation Agent/ Department of Public Works	Develop a Soil and Erosion Control Bylaw and present it to Town Meeting	No work performed for this BMP during Year 7. The Soil and Erosion Control Bylaw was created and approved by Town Meeting during Year 3 of the permit. During Years 4-7, the town began implementing this bylaw and has continued to work with the Conservation Commission to ensure that it is being followed during construction activities.	The Department of Public Works and the Conservation Commission will work together to continue implementing the bylaws, rules, and regulations set forth as part of this BMP.
4-2	Construction Inspections	Conservation Agent/Department of Public Works	Town Representative to inspect Construction Activities on Weekly Basis	During Year 7, as was the case in all previous years of the permit, the Town of Natick has been very active in inspecting construction activities within the Town. ALL construction sites in town are inspected and all departments (building, conservation, DPW, Board of Health) make this a priority and it will remain a top priority for the Town even after the conclusion of the EPA permit.	Goal Completed The Town will continue to monitor ALL construction activities within the Town of Natick. Ongoing Implemented Program

5. Post-Construction Stormwater Management in New Development and Redevelopment

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 7 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Future Years
5-1	Bylaw for Post Construction Runoff	Conservation Agent/Department of Public Works	Develop a bylaw to limit runoff from post construction areas and present it to Town Meeting	No work performed for this BMP during Year 7. The Post Construction Runoff Bylaw was created and approved by Town Meeting during Year 3 of the permit. During Years 4 through 7, the town implemented this bylaw and has been working with the Conservation Commission and Building Department to ensure it is being followed during construction.	The Department of Public Works and the Conservation Commission will work together to continue implementing the bylaws, rules, and regulations set forth as part of this BMP. Goal Completed

5-2	BMP Inspection and Maintenance	Conservation Agent/Department of Public Works	Inspect all town maintained structural BMP's over a Two Year period; Document any problems with BMP and investigate possible modifications	During the inspections of the Town's outfalls, the town's BMP's have also been inspected and their condition noted.	There has been no indication as to what the next 5 year permit will entail; however, the Town will continue to make sure that the locations and conditions of their BMP's are noted and observed and if any new information is available to include it within the database.	Goal Completed
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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 7 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Future Years
6-1	Catch Basin Cleaning	Highway Department	Clean 1/3 of all catch basins per year	Starting in April 2010, a subcontractor will be commencing with the cleaning of approximately 1/3 of all catch basins within Natick. It is scheduled to be completed by the end of Year 7 of the permit or shortly thereafter. This will be done as the last year of a 3 year contract for the Town to have a subcontractor perform catch basin cleaning throughout Natick.	The Town will be bidding a new contract for Catch Basin Cleaning this year that will most likely be a three year contract, but that timeframe may change depending on the results of the draft stormwater permit through the EPA.
6-2	Street Cleaning	Highway Department	Sweep all town owned streets and parking lots once per year; Sweep downtown areas once per month (Apr-Nov); Sweep Major Streets twice per year; Sweep Town Parking Lots twice per year; Document amount of collected debris; and BUD for Street Sweeping Material Collected	All town streets were swept at least once during Year 7 of the permit. Downtown streets were swept once per month (April to November) while major town streets as well as all town owned parking lots were swept twice per year. The amount of street sweepings and catch basin sediment that was collected was documented by the DPW.	Ongoing Implemented Program The town will continue its yearly maintenance of the roadways by cleaning the streets per the schedule that was noted in the Year 7 description until new parameters are established under the new stormwater permit under consideration by EPA. The amount of sediment and debris collected will be documented as was the case in every other year of this permit. Ongoing Implemented Program

6-3	Investigate Town Owned BMP's for Retrofit Opportunities	Department of Public Works	Implement two retrofit projects (based on inspections conducted in BMP 5-2)	As noted in previous submittals, this BMP was completed during Permit Year 4 (ahead of the originally scheduled timeframe).	The Town is always looking for opportunities and places to install retrofit projects and will continue this endeavor in the future. During the past permit year, the Town of Natick as part of a Two Year Construction project rehabilitated the drainage on three of the largest and busiest roadways within Natick. As part of this project, 36 drain manholes were replaced; approx 3,800 feet of piping installed and 45 deep sump catch basins (with hoods) were installed. It is important to note that on every new development, the Town is requiring developers to incorporate structural BMPs (such as deep sump catch basins, hoods, etc) into their storm drainage designs. Goal Completed The training of personnel is important and the Town will continue to be progressive in training its personnel on these very important issues. Ongoing Implemented Program
6-4	Municipal Employee Training	Conservation Agent	Continue town's current practices	During Year 7 of the permit, the town will be performing the required municipal employee training on two separate days (April 27 th and 29 th). Training includes: Hazard Communication, Spill Prevention Control and Countermeasures, Storm Water Management, Stage II Vapor Recovery and "Right to Know". New hires are trained in these areas within their first 30 days of employment.	

6a. Additions

6-5	DPW – General Notice of Intent (GNOI)	Department of Public Works	File a NOI for Routine DPW Operations and Maintenance Activities	After its approval at the beginning of Year 5 of the permit, the DPW began working with the Conservation Commission to ensure that the goals of the GNOI were being met. A representative from the DPW and the Conservation Agent met prior to the end of Year 6 and will be meeting by the end of Year 7 (or soon after) to evaluate the progress of the permit. A report will be submitted to the Conservation Commission noting the progress of the DPW in their O&M activities and what changes should be made to the GNOI to ensure that the permit is meeting its intended goals.	The DPW will continue to work with the Conservation Commission (through the Conservation Agent) to implement this General Notice of Intent and modify as is deemed necessary.	Goal Completed
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7. BMPs for Meeting Total Maximum Daily Load (TMDL) Waste Load Allocations (WLA)

Not applicable. TMDL's have not been developed for any of the water bodies in Natick.

Part IV. Summary of Information Collected and Analyzed

There is no information or data that was collected during Permit Year 7 that is not included elsewhere in this report.

Part V. Program Outputs & Accomplishments (OPTIONAL)

(Since beginning of permit coverage unless specified otherwise by a **, which indicates response is for period covering May 1, 2009 through April 30, 2010)

Programmatic

	(Preferred Units)	Response
Stormwater management position created/staffed	(y/n)	N
Annual program budget/expenditures **	(\$)	36,500
Total program expenditures since beginning of permit coverage	(\$)	Unknown ^{Note 1}
Funding mechanism(s) (General Fund, Enterprise, Utility, etc)		General

Note 1: The annual stormwater program budget of \$36,500 covers only the costs for outside services. All other work performed was completed using Town personnel; equipment; and materials. These costs were not tracked.

Education, Involvement, and Training

Estimated number of property owners reached by education program(s)	(# or %)	Unknown
Stormwater management committee established	(y/n)	Y
Stream teams established or supported	(# or y/n)	N
Shoreline clean-up participation or quantity of shoreline miles cleaned **	(y/n or mi.)	N
Shoreline cleaned since beginning of permit coverage	(mi.)	7
Household Hazardous Waste Collection Days		
■ days sponsored ** (See Note A)	(#)	1
■ community participation **	(# or %)	133
■ material collected **	(tons or gal)	Unknown
School curricula implemented	(y/n)	N

Note A: The Household Hazardous Waste Collection Day for 2009 was held on May 2, 2009 which put it under Permit Year 7. The Household Hazardous Waste Collection Day for 2010 is planned to be held on May 15, 2010 which puts it just out of Permit Year 7. So although the survey shows that we only had one collection day during Year 7, the town does have an additional one planned and is continuing the practice of giving residents the chance to dispose of hazardous materials safely.