

Municipality/Organization: Pittsfield, Massachusetts

EPA NPDES Permit Number: MA041018

MaDEP Transmittal Number: W035321

**Annual Report Number
& Reporting Period:** No. 9: April 2011-March 2012

NPDES PHASE II Small MS4 General Permit Annual Report

Part I. General Information

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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: *Bruce Collingwood*

Printed Name: Bruce Collingwood

Title: Commissioner

Date: April 23, 2012

Part II. New Developments / Self-Assessment

The City of Pittsfield's application to the Berkshire Regional Planning Commission, with the Town of Dalton and the Town of Lanesborough for "Berkshire Regional Planning Commission Request for Technical Assistance - District Local Technical Assistance Program" in order to collaborate efforts that will be required by EPA NPDES Phase II Final Rule has been approved.

According to our consultant we are the first community in New England to employ rain gardens to directly treat street and sidewalk runoff. Rain gardens continue to be constructed curbside as part of our streetscape projects on our city's main thoroughfare.

Our street improvement project included installation of catch basins with deep sumps, oil / water / debris separators on the outlet pipes and where possible, stone bottoms rather than cement concrete to maximize infiltration.

The City of Pittsfield has completed the required self-assessment and has determined that our municipality is in compliance with all permit conditions with the exception of the following:

Part II.A.2 - The City has not yet adopted the necessary ordinances required under Part II.B.4 (a) and B.5 (a) whereby construction-phase and post-construction phase stormwater run-off must be managed in accordance with water quality protection standards. However, the ordinance continues to be reviewed, revised and redrafted and at this point we would like to include any necessary changes resulting from the EPA's forthcoming final rule. As a policy, and in terms of guidance provided to and requirements from the development and construction communities, the City is and has been operating in conformance with the goals of the General Permit.

It is becoming clear that we must consider staffing a position to manage our stormwater program. We have begun discussions with towns that have already done so (namely Northampton and Acton). We plan to continue researching the creation of such a position this year and would like to include direct input from EPA and DEP.

Part I. D. 4 - To our knowledge the state has not yet drafted TMDLs for waters within the boundaries of the City of Pittsfield. The City will consider measures to address pollutants of concern for impaired waters in subsequent permit periods.

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 9 (Reliance on non-municipal partners indicated, if any)	Planned Activities
PEO1	Delineate critical habitats and ecosystems in the community.	Engineering / Matt Billetter	Implement GIS technology to create data layer mapping.	Critical habitat layer is now part of our GIS database.	None
PEO2	Disseminate storm water educational brochures at household hazardous waste collection days.	CET and DPW&U / Bruce Collingwood	Collaborate with CET and HVA to make storm water related educational materials available to hand out beginning with the household hazardous waste collection days scheduled for April and May 2003. Thereafter at each proposed household hazardous waste and computer & monitor collection event through 2008.	No activity this reporting period.	Educational materials will be made available at future household hazardous waste collection events.

PEO3	Utility bill inserts	CET and DPW&U / Bruce Collingwood	<p>Collaborate with CET and HVA to create and disseminate educational brochures with utility bills twice per year beginning April 2003 and continuing until April 2008. The brochures will address different subjects such as the basics of hydrology; what a storm drain is; danger of and alternatives to pesticides, fertilizers, insecticides and herbicides; hotline phone number to report suspected illegal dumping or illicit discharge; date, time, location and materials that will be accepted at household hazardous waste collection events.</p> <p>Budget \$3500 per year for educational materials beginning fiscal year 2004, through fiscal year 2008.</p>	No activity this reporting period.	Continue brainstorming with CET and HVA.
PEO4	Media	Engineering / Matt Billetter	Schedule roundtable with CET and HVA on the Mayor's radio and television programs within the next six months; investigate the possibility of securing a periodic time slot dedicated to environmental awareness and storm water topics.	No activity this reporting period.	Meet with CET and HVA to brainstorm other possible media outreach.
PEO5	Walk-in / website outreach	Engineering / Matt Billetter	Continue to make educational materials available to the public in this office and other offices in City Hall. Add information and links to the City's website in the next six months.	Various environmental education materials are posted and available in brochure format at City Hall.	Continue same.

PEO6	<p>Classroom and hands on storm water education for school children.</p> <p>HVA has an excellent program in place that combines a classroom presentation including an environmental model and a subsequent field day when students label catch basins with an important message.</p>	HVA	<p>Partner with HVA in supporting their educational programs to afford every public and private student the opportunity to participate and learn. We see this as an ongoing BMP that can be modified and adapted to reach other groups and focus on additional field parameters.</p> <p>From the HVA website: “Community Education. HVA can provide speakers for community events, annual meetings, educational forums and other adult activities. HVA can also provide displays on the Housatonic River for your event. We sponsor and conduct educational seminars for land use officials and others on topics of interest. Check with us for details.”</p>	HVA continued their school storm water awareness program as well as several other educational programs.	<p>Continue same.</p> <p>Write letters of support for HVA’s grant applications.</p>
PEO7	Toxics use reduction	CET	Partner with CET to reduce the use of toxic products on lawns and gardens through education and outreach.	CET continues their toxics use reduction outreach and education.	<p>Continue to support CET’s efforts throughout the community.</p> <p>Write letters of support for CET’s grant applications.</p>
PEO8	Responsible recreational vehicle use	Engineering / Matt Billetter	Collaborate with HVA, CET, Massachusetts Environmental Police and/or others to educate and survey recreational vehicle retailers and consumers, urging care and proper procedure when fueling and servicing their boats, jet skis, wave runners, snowmobiles, motorcycles, four wheelers, etc.	No activity this reporting period.	Meet with local environmental groups to discuss and implement effective means of educating the target audience; i.e. point of sale and point of use outreach, manufacturer’s literature, etc.

2. Public Involvement and Participation

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 9 (Reliance on non-municipal partners indicated, if any)	Planned Activities–
PIP1	Revised: Public review of Notice of Intent and annual reports.	Engineering / Matt Billetter	Solicit review and commentary from the citizens of Pittsfield, CET, HVA and BRPC within the next six months. Incorporate such feedback into the City's storm water management plan, as warranted.	Activity completed in prior reporting periods.	Continue to make program information available.
PIP2	Illicit discharge / illegal dumping hotline	Unknown at this time.	<p>Revise City code to establish severe penalties and punishment for illegal dumping.</p> <p>Assess the willingness and ability of City, County and State law enforcement officials to impose penalties and punishment for illegal dumping.</p> <p>Establish and advertise a hotline number within the next two years.</p>	No activity this reporting period.	Review current ordinance, draft proposed modifications.
PIP3	Volunteer monitoring	HVA	Conduct annual survey to determine the number of new volunteers that join HVA's existing program as a result of public education and outreach.	No activity this reporting period.	None

3. Illicit Discharge Detection and Elimination

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 9 (Reliance on non-municipal partners indicated, if any)	Planned Activities
IDDE1	Identifying illicit connections	DPW&U / Bruce Collingwood	<p>Revised:</p> <p>Continue working with the Housatonic Valley Association (HVA) to resolve illicit discharge problems. HVA conducts water quality testing near our storm drain outfalls and contacts us when an illicit discharge is detected. The Water Division then investigates the storm drain at points of access, working up gradient from the outfall until the problem is isolated. This partnership has already yielded corrective results thanks to the devotion of the HVA volunteer monitors and the hard work of the Water Division.</p> <p>Generate plan for dry weather inspection, camera survey, smoke testing, and/or dye testing of storm drains.</p>	No activity this reporting period.	Continue to implement report recommendations. Continue working with HVA if they can ascertain funding to reincarnate the stream team monitoring program.

IDDE2	Illicit discharge / illegal dumping hotline	DPW&U / Bruce Collingwood	<p>Revise City code to establish severe penalties and punishment for illegal dumping.</p> <p>Assess the willingness and ability of City, County and State law enforcement officials to impose penalties and punishment for illegal dumping.</p> <p>Establish and advertise a hotline number within the next two years.</p>	No activity this reporting period.	The city is currently in the process of adopting the ordinance.
IDDE3	Illegal Dumping	DPW&U / Bruce Collingwood	<p>Revise City code to establish severe penalties and punishment for illegal dumping.</p> <p>Assess the willingness and ability of City, County and State law enforcement officials to impose penalties and punishment for illegal dumping.</p>	No activity this reporting period.	The city is currently in the process of adopting the ordinance
IDDE4	Storm drain Mapping	Engineering / Matt Billetter	Verify accuracy of storm drain drawings and modify as necessary, upgrade to GIS over five year timeline.	The entire municipal storm drain system is mapped on the city's GIS system.	GIS mapping will be revised / updated to reflect new construction, field survey data, changes, additions, etc. through our full time GIS coordinator.

4. Construction Site Stormwater Runoff Control

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 9 (Reliance on non-municipal partners indicated, if any)	Planned Activities
C1	Revised: Require erosion & sediment control plan for all construction sites disturbing less than one acre, which are not in wetland resource areas.	Engineering / Matt Billetter	Collaborate with the Conservation Commission over the next year to establish requirements and review process.	No activity this reporting period.	None.
C2	Revised: Require site plan and signed covenant for waste management and vehicle maintenance for all construction sites disturbing less than one acre which are not in wetland resource areas.	Engineering / Matt Billetter	Collaborate with the Conservation Commission over the next year to establish requirements and review process. Generate covenant within the next year, revise City code to support enforcement of covenant.	No activity this reporting period.	None.
C3	Revised: Require escrow account from developer for all construction projects.	DPW&U / Bruce Collingwood	Revise City code and/or subdivision regulations to require an escrow account from the developer to be used by the City to employ the services of an independent, qualified construction inspector selected solely by the City. This account will be required in addition to a performance bond.	Implemented. Using funds for third party review.	Include as part of zoning ordinance, subdivision regulation and city code. Use funds also for construction inspection.

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 9 (Reliance on non-municipal partners indicated, if any)	Planned Activities
PC1	Structural	Engineering / Matt Billetter	<p>Inventory and document all existing structural storm water management facilities within the city, evaluate their current condition, identify the parties responsible for maintenance and any existing maintenance schedules (typically part of the articles of incorporation), request schedule if none exists, request written documentation of maintenance performed to date and annually thereafter.</p> <p>Review and revise as necessary the City's construction specifications and standards, city code, zoning ordinances and subdivision regulations.</p>	<p>Continued same (has been effective):</p> <p>All new construction applicants are required to manage stormwater runoff onsite and maximize infiltration and water quality treatment. Connections to the city's storm drain system are prohibited unless the applicant can prove that site conditions will not fully support onsite management.</p> <p>Encouraged low impact development through reduction of subdivision roadway width requirement (from 30 feet to 24 feet).</p> <p>All new catch basins are required to have a deep sump and oil / water /debris separator.</p> <p>Revised construction standards, permit language and development requirements.</p>	<p>Continue to develop.</p> <p>Create inventory list of publicly and privately owned structural storm water management facilities within the City. Identify on GIS mapping.</p>

PC2	Nonstructural	Engineering / Matt Billetter	Establish criteria for site planning that requires incorporation of non-structural storm water management measures (trees, shrubs, flowers, etc.) where applicable.	The city continues to study and encourage low impact development. We continue to collaborate with designers and developers to include items such as rain gardens and water quality swales.	Continue to develop.
PC3	Ordinance	DPW&U / Bruce Collingwood and City Council	Review and revise as necessary the City's construction specifications and standards, city code, zoning ordinances and subdivision regulations to clearly define storm water management requirements, policies and practices.	Ongoing.	The city is currently in the process of adopting stormwater ordinance.

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 9 (Reliance on non-municipal partners indicated, if any)	Planned Activities
PPGH1	Continue used motor oil, oil filter and antifreeze recycling.	Highway / Tom Foody		Continue same.	Continue same.
PPGH2	Responsible pest control	Highway / Tom Foody, Water & Sewer/ Matt Inhelder Wastewater / Tom Landry Parks / Jim McGrath Buildings / Ernie Fortini	Although the City of Pittsfield uses little to no chemical pesticides at this time, we will be working with CET to create an Integrated Pest Management (IPM) plan for the City that minimizes use of Tier 1 chemicals to the MEP.	Idle for now as it was determined that the City currently uses little to no pesticides, herbicides and fertilizers.	None.

PPGH3	Vehicle washing	Highway / Tom Foody, Water & Sewer/ Matt Inhelder Wastewater / Tom Landry Parks / Jim McGrath Buildings / Ernie Fortini	Revised: Establish and implement a policy for washing City vehicles only on grassed areas, areas that drain to the sanitary sewer via an oil / water separator or in an area where wash water is contained and pumped to the sanitary sewer. City conducted audits of all municipal facilities including facilities that include vehicle washing operations. Recommendations were made regarding long term washing operations which are currently under review by the City.	No activity this reporting period.	Write official policy. Share policy with all City departments that own/operate or maintain City vehicles. Check to see if we are implementing. If not, re- educate Department Heads and staff.
PPGH4	Research alternatives to road salts and effective application rates	Engineering / Matt Billetter Highway / Tom Foody	Research effective alternatives to conventional road salts that are more environmentally friendly and techniques of effective lower salt application rates. Research road salt application rates of other communities in Berkshire County and the northeast region. Perform active experimentation on designated sections of roadway and document results, starting winter 2003/2004. Create a map identifying sensitive areas where little or no salt shall be applied (bridges, culverts, wetlands, etc.); to be completed and distributed within the next year.	No activity this reporting period.	Review “Manual of Practice for an Effective Anti-Icing Program” and additional research. Involve the Highway Superintendent and Commissioner.

PPGH5	Household hazardous waste collection events(HHWCE)	CET and DPW&U / Bruce Collingwood	Collaborate with CET to organize one HHWCE for each spring, summer and fall in the City of Pittsfield.	No events were held in 2011	At least one event will be budgeted for 2012.
PPGH6	Street & parking lot sweeping	Highway / Tom Foody	Revised: Sweep streets before flushing water mains, consider vacuum sweepers	Streets & parking lots were swept. Pre water main flushing priority is being given to streets closest to lakes and streams. Increased frequency of downtown area sweeping.	Streets & parking lots will be swept.
PPGH7	Storm drain system cleaning	Water & Sewer/ Matt Inhelder	Revised: Clean each catch basin once annually. Inspect each outfall once annually and clean accordingly.	City's Water, Sewer & Drain Department cleans catch basins (now with a newly purchased vacuum truck); city also contracts this work.	Continue same.
PPGH8	Proper snow disposal	Highway / Tom Foody	Develop policy and train Highway Department personnel.	No activity this reporting period.	Write official policy. Train staff.