1056

Massachusetts Department of Environmental Protection
Bureau of Resource Protection - Watershed Management

BRP WM 08A NPDES Stormwater General Permit

Notice of Intent for Discharges from Small Municipal Separate Storm Sewer Systems (MS4s)

W040966
Transmittal Number

Facility ID (if known)

A. Instructions

Important: When filling out forms on the computer, use only the tab key to move your cursor - do not use the return key.

Submission of this Notice of Intent constitutes notice that the entity named at item B1. of this form intends to be authorized by the DEP General Permit issued jointly with EPA for stormwater discharges from the small municipal separate storm sewer system (MS4), in the location identified at item B2. of this form. Submission of the Notice of Intent also constitutes notice that the party identified at item B1. has read, understands and meets the eligibility conditions of Part I.B. of the NPDES Small MS4 General Permit, agrees to comply with all applicable terms and conditions of the NPDES Small MS4 General Permit, and understands that continued authorization to discharge is contingent on maintaining eligibility for coverage. **In order to be granted coverage, all information required on BRP WM 08A, including the Stormwater Management Program Summary and Time Frames form, must be completed. Please read the permit and make sure you comply with all requirements, including the requirement to develop and implement a stormwater management program.**

B. Applicant Information

1. Small MS4 Operator/Owner Information:

   Town of Reading - Joseph Delaney, Town Engineer primary contact
   Name

   16 Lowell Street
   Mailing Address

   Reading — City/Town
   MA — State

   (781) 942-9083 — Telephone Number
   jdelaney@ci.reading.ma.us — Email (if available)

2. Municipality Name

   Town of Reading
   City/Town

3. Legal Status:

   ☐ Federal ☒ City/Town ☐ State ☐ Tribal ☐ Private

   ☐ Other public entity: _____ Specify Public Entity

4. Other regulated MS4(s) within municipal boundaries:

   MassHighway properties, Camp Curtis Guild National Guard Facility

5. Based on the instructions provided in Part I of the NPDES Small MS4 General Permit, have the eligibility criteria for "listed species" and critical habitat been met?

   ☐ yes ☒ pending ☐ no

JUL 30 2003

MUNICIPAL ASSISTANCE UNIT

Massachusetts Department of Environmental Protection
Bureau of Resource Protection - Watershed Management

BRP WM 08A NPDES Stormwater General Permit

Notice of Intent for Discharges from Small Municipal Separate Storm Sewer Systems (MS4s)

W040966
Transmittal Number

Facility ID (if known)

B. Applicant Information (cont.)

6. Based on the instructions provided in Part I of the NPDES Small MS4 General Permit, have the eligibility criteria for protection of historic properties been met?

☐ yes ☒ pending ☐ no

Note: Section C may be duplicated to accommodate a larger list of receiving waters

C. Names of (Presently Known) Receiving Waters

Receiving Water:	No. of Outfalls	Listed as Impaired?	Impairment
Ipswich River (Name)	Unknown (Number)	☒ Yes ☐ No	Nutrients, Flow Alteration (Specify)
Aberjona River (Name)	Unknown (Number)	☒ Yes ☐ No	Low DO, Pathogens, etc. (Specify)
Walkers Brook (Name)	Unknown (Number)	☐ Yes ☐ No	Not in 303(d) list (Specify)
Bare Meadow Brook (Name)	Unknown (Number)	☐ Yes ☐ No	No use assessed (Specify)
Name	Number	☐ Yes ☐ No	Specify
Name	Number	☐ Yes ☐ No	Specify
Name	Number	☐ Yes ☐ No	Specify
Name	Number	☐ Yes ☐ No	Specify
Name	Number	☐ Yes ☐ No	Specify
Name	Number	☐ Yes ☐ No	Specify
Name	Number	☐ Yes ☐ No	Specify
Name	Number	☐ Yes ☐ No	Specify
Name	Number	☐ Yes ☐ No	Specify
Name	Number	☐ Yes ☐ No	Specify
Name	Number	☐ Yes ☐ No	Specify
Name	Number	☐ Yes ☐ No	Specify
Name	Number	☐ Yes ☐ No	Specify

Massachusetts Department of Environmental Protection
Bureau of Resource Protection - Watershed Management

BRP WM 08A NPDES Stormwater General Permit

Notice of Intent for Discharges from Small Municipal Separate Storm Sewer Systems (MS4s)

W040966
Transmittal Number

Facility ID (if known)

D. Stormwater Management Program Summary

1. Public Education:

BMP ID #		
1		
Research available public educational materials	See attachments for BMP responsibilities	See attachments for Measurable Goals
2		
Develop a public education plan	Responsible Dept./Person Name	Specify Measurable Goal
3		
Present annual report to Town Meeting	Responsible Dept./Person Name	Specify Measurable Goal
4		
Implement public education plan	Responsible Dept./Person Name	Specify Measurable Goal
Specify Best Management Practice	Responsible Dept./Person Name	Specify Measurable Goal

2. Public Participation:

BMP ID #		
5		
Establish a storm water advisory committee	Responsible Dept./Person Name	Specify Measurable Goal
6		
Comply with public meeting laws for committee meetings	Responsible Dept./Person Name	Specify Measurable Goal
7		
Develop a public involvement /particpation plan	Responsible Dept./Person Name	Specify Measurable Goal
8		
Solicit volunteers for public participation plan	Responsible Dept./Person Name	Specify Measurable Goal
9		
If sufficient volunteers are identified, implement plan	Responsible Dept./Person Name	Specify Measurable Goal

D. Stormwater Management Program Summary (Cont.)

3. Illicit Discharge Detection and Elimination:

BMP ID #		Responsible Dept./Person Name	Specify Measurable Goal
10	Develop outfall map using existing information		
11	Review existing regulations and bylaws		
12	If necessary, develop non-storm water discharge by-law		
13	Develop 3-year plan to identify and eliminate illicit discharges		
14	Implement 3-year illicit discharge detection program		

4. Construction Site Runoff Control:

BMP ID #		Responsible Dept./Person Name	Specify Measurable Goal
15	Review existing by-laws and regulations		
16	If necessary, develop erosion control by-law		
17	If necessary, amend existing eroion control regulations		
18	Revise/ resubmit by-law if not approved by Town Meeting		
19	Enforce new bylaw/regulation		

Specify Best Management Practice

D. Stormwater Management Program Summary (Cont.)

5. Post Construction Runoff Control:

BMP ID #		Responsible Dept./Person Name	Specify Measurable Goal
20	Review existing by-laws and regulations		
21	If necessary, develop a post-construction runoff by-law		
22	Inventory existing BMP's that are under Town's jurisdiction		
23	Develop five-year O&M plan for Town-owned BMP's		
24	Begin implementation of five-year O&M Plan		

6. Municipal Good Housekeeping:

BMP ID #		Responsible Dept./Person Name	Specify Measurable Goal
25	Evaluate Town's current good housekeeping practices		
26	Develop written O&M plan to formalize Town's practices		
27	Implement O&M plan		
28	Street Sweeping		
29	Catch Basin Cleaning		

Massachusetts Department of Environmental Protection
Bureau of Resource Protection - Watershed Management

BRP WM 08A NPDES Stormwater General Permit

Notice of Intent for Discharges from Small Municipal Separate Storm Sewer Systems (MS4s)

W040966
Transmittal Number

Facility ID (if known)

D. Stormwater Management Program Summary (cont.)

~~7. BMPs for Meeting TMDL:~~

BMP ID #	Specify Best Management Practice	Responsible Dept./Person Name	Specify Measurable Goal
30	Household Hazardous Waste dropoff		
31	Resident used oil dropoff		
32	Recycle Town-generated tires, batteries, scrap metal, used oil		

E. 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, I certify that 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.

Peter I Hechenbleikner, Town Manager
Printed Name

Signature

July 29, 2003
Date

Massachusetts Department of Environmental Protection
Bureau of Resource Protection - Watershed Management

BRP WM 08A NPDES Stormwater General Permit Notice of Intent for Discharges from Small Municipal Separate Storm Sewer Systems (MS4s)

F. Storm Water Management Program TIME FRAMES

Transmittal Number W040966

Facility ID (if known)

Page ____ of 1

	PERMIT YEAR ONE				PERMIT YEAR TWO				PERMIT YEAR THREE				PERMIT YEAR FOUR				PERMIT YEAR FIVE				
BMP ID #	Spring 03	Summer 03	Fall 03	Winter 03-04	Spring 04	Summer 04	Fall 04	Winter 04-05	Spring 05	Summer 05	Fall 05	Winter 05-06	Spring 06	Summer 06	Fall 06	Winter 06-07	Spring 07	Summer 07	Fall 07	Winter 07-08	Next Permit
1		x	x	x																	
2					x	x	x	x													
3					x				x				x				x				
4									x	x	x	x	x	x	x	x	x	x	x	x	
5	x																				
6	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	
7					x	x	x	x													
8									x	x	x	x									
9													x	x	x	x	x	x	x	x	
10		x	x	x	x																
11		x	x	x																	
12					x	x	x														
13					x	x	x	x													
14									x	x	x		x	x	x		x	x	x		
15		x	x	x																	
16					x	x	x														
17					x	x	x														
18											x				x				x		
19									x	x	x	x	x	x	x	x	x	x	x	x	
20		x	x	x																	
21					x	x	x														
22					x	x	x														
23									x	x	x	x									
24													x	x	x		x	x	x		
25	x	x	x	x																	
26					x	x	x	x													
27									x	x	x	x	x	x	x	x	x	x	x	x	
28	x	x	x		x	x	x		x	x	x		x	x	x		x	x			
29	x	x	x		x	x	x		x	x	x		x	x	x		x	x	x		
30		x				x				x				x				x			
31	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	
32	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	

NPDES PHASE II STORM WATER NOTICE OF INTENT NARRATIVE

APPROACH TO COMPLIANCE

In reviewing the requirements of the NPDES General Permit for Storm Water Discharges from Small MS4s as well as the Storm Water Phase II Final Rule, it has become apparent that there is significant room for interpretation of the regulations by individual municipalities. Also, the voluminous EPA guidance documents establish numerous BMPs that may or may not be implemented by communities. While these guidance documents are well prepared and provide much useful information, there are no specific requirements established within them. Given these considerations, the Town of Reading finds that it is nearly impossible to develop a definitive five-year compliance plan.

What the Town of Reading has attempted to do is establish a broad framework that will ultimately result in compliance with the regulations. For each of the six minimum criteria, the framework generally follows these five guidelines:

1. Evaluate current Town operations with respect to each criteria;
2. Compare current operations with regulatory requirements;
3. Develop plans to close gaps between current operations and regulatory requirements;
4. Implement plans; and
5. Re-evaluate operations after plan implementation.

In following these guidelines, it became very difficult to establish measurable goals for anything beyond the first year or two of the program. For instance, in the construction site runoff control area our first BMP is to review current Town by-laws to determine if we need to pass any new by-laws. After this effort is complete, we may find that we are fully covered and do not need to do anything further. We also may find that there is much further work to do. Therefore, identifying anything beyond the first step is mere speculation. What we expect to happen in the second through fifth years of the program are annual revamping of the measurable goals based on the results of the previous years work.

BEST MANAGEMENT PRACTICES

1. Public Education and Outreach on Storm Water Impacts

- Research available public education materials developed by other municipalities or agencies and tailor for use by the Town of Reading.

  Responsible Department: Community Services, Public Works

  Measurable Goal: Compilation of education materials

- Develop a public education plan that considers the use of mass mailings, targeted mailings, press releases, web site information, and cable television.

  Responsible Department: Community Services, Public Works

  Measurable Goal: Development of plan

- Present annual report to Town Meeting.

  Responsible Department: Public Works

  Measurable Goal: Make presentation

- Implement Public Education program based on the schedules developed in the Public Education Plan.

  Responsible Department: Community Services, Public Works

  Measurable Goal: Meet schedules identified in plan

2. Public Involvement/Participation

- Establish a Storm Water Management Advisory Committee by either developing a new committee or adding the responsibility to an existing committee.

  Responsible Department: General Services, Board of Selectmen

  Measurable Goal: Establish committee

- Comply with Public Meeting Laws for the meeting of the advisory committee

  Responsible Department: Public Works

  Measurable Goal: Keep records of proper posting/advertising

- Develop a Public Involvement/Participation Plan that identifies public involvement opportunities and those groups that should be targeted for involvement/participation. This plan will investigate at a minimum, storm drain stenciling programs and stream cleanups.

  Responsible Department: Community Services, Public Works

  Measurable Goal: Development of the plan

- Solicit volunteers for the public involvement/participation activities identified in the plan.

  Responsible Department: Community Services, Public Works

  Measurable Goal: Keep records of organizations contacted

- If sufficient volunteers are identified, implement public involvement/participation plan.

  Responsible Department: Community Services, Public Works

  Measurable Goal: Keep records of public involvement/participation activities conducted

3. Illicit Discharge Detection and Elimination

- Develop outfall map using exiting information

  Responsible Department: Public Works

  Measurable Goal: Map developed

- Review existing regulations and by-laws to determine if a new by-law is necessary or if existing by-laws or regulations need to be amended to comply with the standard.

  Responsible Department: Community Services, Public Works

  Measurable Goal: Report on adequacy of existing by-laws

- Based on outfall map, develop a three-year plan to identify and eliminate illicit discharges.

  Responsible Department: Public Works

  Measurable Goal: Plan developed

- If necessary, develop by-law that prohibits the discharge of non-storm water discharges to the drainage system and bring to Town Meeting for approval.

  Responsible Department: Community Services, Public Works

  Measurable Goal: If necessary, by-law written and brought to Town Meeting

- If necessary, amend exiting regulations that prohibit non-storm water discharges to the drainage system.

  Responsible Department: Community Services, Public Works
  Measurable Goal: Regulations amended

- Implement Illicit Discharge Detection and Elimination Program based on schedule identified in the three-year plan subject to Town funding.

  Responsible Department: Public Works

  Measurable Goal: Complete each phase of the program by the deadline outlined in the three-year plan.

- If Town Meeting does not approve by-law or if the Attorney General's review negates the by-law, revise by-law and bring back to Town Meeting for approval (if necessary).

  Responsible Department: Community Services, Public Works

  Measurable Goal: By-Law revised and resubmitted to Town Meeting

4. Construction Site Storm Water Runoff Control

- Review existing regulations and by-laws to determine if a new by-law is necessary or if existing by-laws or regulations need to be amended to comply with the standard.

  Responsible Department: Community Services, Public Works

  Measurable Goal: Summary report of regulatory review prepared

- If necessary, develop an erosion control by-law or modify existing by-law and bring to Town Meeting for approval.

  Responsible Department: Community Services, Public Works

  Measurable Goal: New by-law brought to Town Meeting

- If necessary, amend existing sediment and erosion control regulations

  Responsible Department: Community Services, Public Works

  Measurable Goal: Regulations amended

- If Town Meeting does not approve by-law or if the Attorney General's review negates the by-law, revise by-law and bring back to Town meeting for approval (if necessary).

  Responsible Department: Community Services, Public Works

  Measurable Goal: By-Law revised and resubmitted to Town Meeting

- Enforce new by-law or regulation in accordance with the enforcement procedures established in the regulation or by-law.

  Responsible Department: Community Services

  Measurable Goal: Keep records of enforcement actions

5. Post-Construction Storm Water Management in New Development and Redevelopment

- Review existing regulations and by-laws to determine if a new by-law is necessary or if existing by-laws or regulations need to be amended to comply with the standard.

  Responsible Department: Community Services, Public Works

  Measurable Goal: Summary report of regulatory review prepared

- If necessary, develop a post-construction runoff by-law or modify existing by-law and bring to Town Meeting for approval.

  Responsible Department: Community Services, Public Works

  Measurable Goal: New by-law brought to Town Meeting

- If necessary, amend existing post-construction runoff regulations

  Responsible Department: Community Services, Public Works

  Measurable Goal: Regulations amended

- Inventory existing Best Management Practices (detention basins, retention basins, drainage ditches, etc.) that are under the jurisdiction of the Town.

  Responsible Department: Public Works

  Measurable Goal: All BMPs inventoried

- If Town Meeting does not approve by-law or if the Attorney General's review negates the by-law, revise by-law and bring back to Town meeting for approval (if necessary).

  Responsible Department: Community Services, Public Works

  Measurable Goal: By-Law revised and resubmitted to Town Meeting

- Enforce new by-law or regulation in accordance with the enforcement procedures established in the regulation or by-law.

  Responsible Department: Community Services

  Measurable Goal: Keep records of enforcement actions

- Develop an Operation and Maintenance (O&M) Plan for the BMPs identified in the inventory that initially established a five-year implementation schedule.

  Responsible Department: Public Works, Community Services

  Measurable Goal: O&M Plan written

- Implement five-year O&M Plan subject to Town finding

  Responsible Department: Public Works

  Measurable Goal: O&M activities conducted on BMPs identified in accordance with schedule identified in O&M Plan

6. Pollution Prevention and Good Housekeeping for Municipal Operations

- Evaluate Town's current practices with respect to Pollution Prevention/Good Housekeeping.

  Responsible Department: Public Works

  Measurable Goal: Report prepared on current Good Housekeeping practices

- Develop a written Operation and Maintenance (O&M) Plan to: formalize current O&M practices; establish a training program, identify new programs that might be necessary; and establish implementation schedules for existing and new programs.

  Responsible Department: Public Works

  Measurable Goal: O&M Plan developed

- Implement O&M Plan subject to Town funding

  Responsible Department: Public Works

  Measurable Goal: O&M activities are carried out as identified in the O&M Plan, records of O&M activities kept

- Sweep all Town-owned streets and parking lots once per year subject to Town funding.

  Responsible Department: Public Works

  Measurable Goal: All streets and parking lots swept, records kept of sweeping operations

- Clean all Town-owned catch basins once per year subject to Town funding.

  Responsible Department: Public Works

  Measurable Goal: All catch basins cleaned, records of catch basin cleaning kept

- Provide one household hazardous waste drop-off per year subject to Town funding.

  Responsible Department: Public Works, Community Services

  Measurable Goal: Household hazardous waste drop-off conducted

- Provide used oil drop-off at the Public Works Garage at least 10 hours per week subject to Town funding.

  Responsible Department: Public Works

  Measurable Goal: Used oil drop-off maintained, records of used oil maintained

- Recycle Town generated tires, car batteries, scrap metal, scrap iron and waste oil subject to Town funding.

  Responsible Department: Public Works

  Measurable Goal: Identified materials recycled, records kept