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2004 APR 29 P 9:42

April 28, 2004

Thelma Murphy
Regional Stormwater Coordinator
U. S. Environmental Protection Agency
Water Technical Unit
P.O. Box 8127
Boston, MA 02114

Subject: Brockton, MA Phase II Stormwater Annual Progress Report

Dear Ms. Murphy:

On behalf of the City of Brockton, please find attached their first Annual Progress Report for their Stormwater Management Plan. The City submitted a Notice of Intent (NOI) in July 2003 to comply with the EPA's National Pollutant Discharge Elimination System (NPDES) Phase II Stormwater Final Rule. Brockton received letters from both EPA Region 1 and Massachusetts DEP on September 17, 2003 acknowledging Brockton's submittal of a complete NOI. These letters assigned Brockton the permit number: MAR041098.

The progress report details the City's progress on the best management practices (BMPs) listed in the NOI and included in the City's Stormwater Management Plan. It also describes the City's planned activities for the coming year.

Please do not hesitate to call either me at 617 452-6663 or Mr. David Norton at 508 580-7135.

Very Truly Yours,

Carolyn Gilbert

Carolyn Gilbert
Project Engineer
Camp Dresser & McKee Inc.

cc: Ginny Scarlett, MA DEP
David Norton, Department of Public Works Interim Commissioner, City of Brockton
Jacques Borges, City Engineer, City of Brockton
Michael Curtin, General Foreman of Operations, City of Brockton
Greg Roy, CDM

Municipality/Organization: City of Brockton, MA

EPA NPDES Permit Number: MA041098

2004 APR 29 P 9:42

MaDEP Transmittal Number: **W-035669**

Annual Report Number & Reporting Period: **No. 1: March 03-March 04**

NPDES PII Small MS4 General Permit Annual Report

Part I. General Information

Contact Person: David A. Norton Title: Interim DPW Commissioner

Telephone #: (508) 580 - 7135 Email: dnorton@ci.brockton.ma.us

Certification:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature:

Printed Name: David A. Norton

Title: Interim DPW Commissioner, City of Brockton

Date: 4/22/04

Part II. Self-Assessment

The City of Brockton has completed the required self-assessment and determined that the municipality is in compliance with all permit conditions.

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 1 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 2
1-1	Stencil Catch Basins	Highway Department	Catch Basins Stenciled	The highway department has procured decals for the catch basins, which explain that the catch basins drain to the river.	Place decals at up to 100 catch basins.
1-2	Household Hazardous Waste Collection Day	Department of Public Works	One Collection Day Held per Year	Household Hazardous Waste Collection Day Held October 26, 2003	Hold a Household Hazardous Waste Collection Day in Fall 2004.
1-3 (same as 3-6)	Inserts in Water and Sewer Bills	Water and Sewer Department	Bill Stuffers Mailed, Bill Stuffer Developed in Years 2 and 4	Bill stuffers have been included with water and sewer bills in permit year 1.	Develop and illicit connection bill stuffer (with CDM assistance).
1-4	Resident Hotline	Operations	Hotline operated 24 hours per day, 365 days per year	Hotline operated at Water and Sewer Department	Continue hotline.
1-5	Pooper Scooper Ordinance	City Clerk	Ordinance passed, enforced	Ordinance was passed prior to permit term. Enforcement continued through permit year 1.	Continue enforcing Pooper Scooper Ordinance.
1-6	Newspaper Article	Department of Public Works	One Article Published per Year	An article describing the stormwater permit was written and submitted to the Brockton Enterprise.	None
Revised	Newspaper Article	Department of Public Works	One Article Published every three years		

1a. Additions

No Additions to Control Measure 1

2. Public Involvement and Participation

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 1 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 2
2-1	Comply with State public notification guidelines at MGL Chapter 39 Section 23B.	City Clerk	Notices Posted According to State Guidelines	All notices have been posted according to state guidelines.	Continue posting notices according to state guidelines.
2-2	Public Review for Stormwater Management Plan	Department of Public Works	Review Period Held	Review period held April 1-30, 2004.	Incorporate comments into Stormwater Management Plan if necessary. (with CDM assistance)

2a. Additions

No additions to Control Measure 2.

3. Illicit Discharge Detection and Elimination

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 1 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 2
3-1	Illicit Connection Ordinance	City Council	Ordinances Passed	Ordinance complete prior to permit term.	None
3-2	Dry Weather Screening	Highway Department	Outfalls Screened During Permit Year 4	None, first round of dry weather screening complete in 2002	None
3-3	Map Stormwater Outfalls	Engineering Department	Map Created	Map completed prior to permit term.	None
3-4	Sewer GIS	Sewer Department	GIS Created	GIS complete prior to permit term.	None
3-5	Storm Drain GIS	Engineering Department	GIS Created	The storm drain GIS is 95% complete.	Complete GIS. (with CDM assistance)
3-6	Identify and Remove Non-Stormwater Discharges to MS4	Engineering Department	Prioritized List of Outfalls by end of Permit year 1; field investigations completed, illicit connection located and removed within three years of dry weather screening	Prioritized list of outfalls developed based on 2002 dry weather screening	Begin conducting field investigations of priority outfalls. (with CDM assistance)
3-6 (same as 1-3)	Bill Stuffers in Water and Sewer Bills	Water and Sewer Departments	Illicit Connection Bill Stuffer Created in Permit Year 2	None	Create illicit connection bill stuffer. (with CDM assistance)

3a. Additions

No additions to Control Measure 3.

4. Construction Site Stormwater Runoff Control

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 1 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 2
4-1	Construction Site Erosion and Sediment Control Ordinance	Planning Board, Planning Department and Engineering Department	Ordinance developed and presented to City Council, Enforcement actions taken after ordinance is passed.	None	Research ordinance and begin drafting ordinance. (with CDM assistance)
4-2	Site Plan Reviews	David Norton, Craig Young, Jacques Borges and Howard Newton	Number of site plans reviewed	Site plans have been reviewed as needed.	Continue reviewing site plans.
4-3	Consideration of Public Input	Department of Public Works	Review periods held, signs posted at construction sites	None	Begin placing notices in the newspaper to announce a review and comment period for sites greater than one acre.
4-4	Inspection of Erosion and sediment controls	David Norton, Craig Young, Jacques Borges and Howard Newton.	Number of Inspections Performed	Inspections were performed at all sited thought to be in non-compliance.	Begin revising the inspection protocol and creating a checklist for inspections.

4a. Additions

No Additions

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 1 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 2
5-1	Develop a bylaw to apply Standards 2, 3, 4, 7 and 9 of the MA Stormwater Policy to the entire City.	City Solicitor	Ordinance Developed and Presented to City Council in Year 1	The City has begun drafting an ordinance.	The City plans to finish drafting the ordinance by the end of permit year 2. (with CDM assistance)
5-2	Specify a stormwater BMP manual	Planning Board and Engineering	BMP Manual Selected	The City has selected several possible BMP manuals for further review.	Finalize BMP manual selection.
5-3	Ordinance for the long-term maintenance of BMPs	Planning Board, Engineering Department and City Solicitor	Ordinance Developed and Presented to City Council in Permit Year 1	The City has begun drafting an ordinance.	The City plans to finish drafting the ordinance by the end of permit year 2. (with CDM assistance)

5a. Additions

There are no additions to Control Measure 5.

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 1 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 2
6-1	Identify Sensitive Receptors	David Norton, Craig Young, Jacques Borges and Howard Newton	List of sensitive receptors developed in permit year 2, staff training completed	None	Develop list of sensitive receptors.
6-2	Street Sweeping	Highway Department	All streets swept once per year	All streets were swept between April 2003 and June 2003. As of April 9, 2004, approximately 1/3 of the city streets have been swept in 2004.	Sweep all streets in the spring of 2004.
6-3	Tree Planting Program	Highway Department, City Planner	Number of Trees Planted	The existing tree planting program was continues in permit year 1. Seven trees were planted in the spring of 2003 and twenty six trees were planted in the fall of 2003.	Continue tree planting program.
6-4	Minimizing Effects from Road Salt	Highway Department	Spreaders Calibrated Every Year	Salt spreaders were calibrated and salt was stored inside.	Calibrate salt spreaders and continue storing salt inside.
6-5	Vehicle Washing	Department of Public Works	Vehicles Washed Correctly	Vehicle washing protocol was followed. Sander trucks were rinsed outside and other vehicles were washed inside the DPW garage where the wash water drains to the sewer.	Continue washing vehicles using the existing protocol.
6-6	Vehicle Maintenance	Department of Public Works	Employee Training Conducted in Permit Year 1, Materials Inventory Created in Permit Year 2	Employees continued to minimize the use of hazardous materials. Employees watched a video entitled, "Case of the Right to Know Mystery". The video covers hazards in the workplace including proper waste disposal.	Create a hazardous material inventory.

6-7	Storm Drain Maintenance	Highway Department	All catch basins cleaned every 2 years	As of April 9, 2004 over half the catch basins have been cleaned in the spring of 2004.	Clean half the catch basins in the spring of 2005.
6-8	Park and Landscape Maintenance	Parks Department	Staff Training Completed in Permit Year 2, fertilizer use minimized thereafter	None	Train staff to minimize fertilizer use.
6-9	Illegal Dumping Control	Department of Public Works	Inventory areas in permit year 1, signs posted and staff trained in year 2 and records maintained thereafter	The Highway Department has developed a list of illegal dumping areas.	Post signs at illegal dumping areas and train staff how to monitor, identify and report illegal dumping.
6-10	River Bank Trash Clean-up	Highway Department	Clean-up conducted throughout the year	A clean-up crew worked an average of 2-days per week on river clean up.	Continue the river clean up project.
6-11	Best Management Practices for D.W. Field Park and Municipal Golf Course	Department of Public Works, Parks Department, Golf Course Personnel	Conduct study of potential BMPs in Year 2. Implement study results thereafter,	None	Conduct study of potential BMPs for the D.W. Field Park and Municipal Golf Course. (with CDM assistance)

6a. Additions

There are no additions for Control Measure 6.

7. BMPs for Meeting Total Maximum Daily Load (TMDL) Waste Load Allocations (WLA) *<<if applicable>>*

Not Applicable

Part IV. Summary of Information Collected and Analyzed

There is no additional information attached.

Part V. Program Outputs & Accomplishments (OPTIONAL)

Programmatic (Optional)

Stormwater management position created/staffed	
Annual program budget/expenditures	

Education, Involvement, and Training (Optional)

Estimated number of residents reached by education program(s)	
Stormwater management committee established	
Stream teams established or supported	
Shoreline clean-up participation or quantity of shoreline miles cleaned	
Household Hazardous Waste Collection Days	
▪ days sponsored	
▪ community participation	
▪ material collected	
School curricula implemented	

Legal/Regulatory (Optional)

	In Place Prior to Phase II	Under Review	Drafted	Adopted
Regulatory Mechanism Status (indicate with "**X**")				
▪ Illicit Discharge Detection & Elimination				
▪ Erosion & Sediment Control				
▪ Post-Development Stormwater Management				
Accompanying Regulation Status (indicate with "**X**")				
▪ Illicit Discharge Detection & Elimination				
▪ Erosion & Sediment Control				
▪ Post-Development Stormwater Management				

Mapping and Illicit Discharges (Optional)

Outfall mapping complete	
Estimated or actual number of outfalls	
System-Wide mapping complete	
Mapping method(s)	
▪ Paper/Mylar	
▪ CADD	
▪ GIS	
Outfalls inspected/screened	
Illicit discharges identified	
Illicit connections removed	
% of population on sewer	
% of population on septic systems	

Construction (Optional)

Number of construction starts (>1-acre)	
Estimated percentage of construction starts adequately regulated for erosion and sediment control	
Site inspections completed	
Tickets/Stop work orders issued	
Fines collected	
Complaints/concerns received from public	

Post-Development Stormwater Management (Optional)

Estimated percentage of development/redevelopment projects adequately regulated for post-construction stormwater control	
Site inspections completed	
Estimated volume of stormwater recharged	

Operations and Maintenance (Optional)

Average frequency of catch basin cleaning (non-commercial/non-arterial streets)	
Average frequency of catch basin cleaning (commercial/arterial or other critical streets)	
Total number of structures cleaned	
Storm drain cleaned	
Qty. of screenings/debris removed from storm sewer infrastructure	
Disposal or use of sweepings (landfill, POTW, compost, recycle for sand, beneficial use, etc.)	
Cost of screenings disposal	

Average frequency of street sweeping (non-commercial/non-arterial streets)	
Average frequency of street sweeping (commercial/arterial or other critical streets)	
Qty. of sand/debris collected by sweeping	
Disposal of sweepings (landfill, POTW, compost, beneficial use, etc.)	
Cost of sweepings disposal	
Vacuum street sweepers purchased/leased	
Vacuum street sweepers specified in contracts	

Reduction in application on public land of: ("N/A" = never used; "100%" = elimination)	
▪ Fertilizers	
▪ Herbicides	
▪ Pesticides	

Anti-/De-Icing products and ratios	
Pre-wetting techniques utilized	
Manual control spreaders used	
Automatic or Zero-velocity spreaders used	
Estimated net reduction in typical year salt application	
Salt pile(s) covered in storage shed(s)	
Storage shed(s) in design or under construction	