MAR041008

Dufresne-Henry

engineers
planners
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environmental scientists

April 14, 2005

United States Environmental Protection Agency
Water Technical Unit
P.O. Box 8127
Boston, MA 02114

And

Massachusetts Department of Environmental protection
Division of Watershed Management
67 Main Street
Worcester, MA 01608

RE: Town of Hadley 2004 NPDES Annual Report
Hadley, Massachusetts
DH #9220043

Dear EPA and DEP:

On behalf of the Town of Hadley, Massachusetts, we are submitting the second Annual Report for the year starting May 2004 until May 2005, as required under the NPDES Phase II General Permit for their MS4.

We hope the enclosed report satisfies all the requirements of the permit. If you have any questions, I can be reached in our Northampton office at 413 584-4776 Ext. 107.

Thank you for your anticipated cooperation.

Very truly yours,

DUFRESNE-HENRY, INC.

Steven G. Mason, P.E.
Project Manager

SGM/sgm,sld
Enclosure

c: Michael Klimoski, Town of Hadley Highway Department
Hadley Board of Selectmen

• 136 West Street, Suite 203, Northampton, MA 01060-3711 • T: 413.584.4776 • F: 413.584.3157 •
• E: northampton@dufresne-henry.com • W: dufresne-henry.com •

2004 NPDES PHASE II MS4 GENERAL PERMIT ANNUAL REPORT

HADLEY, MASSACHUSETTS

Presented to:
United States
Environmental Protection Agency
Water Technical Unit
P.O. Box 8127
Boston, MA 02114

And

Massachusetts Department of Environmental Protection
Division of Watershed Management
67 Main Street
Worcester, MA 01608

Prepared by:
Dufresne-Henry, Inc.
136 West Street, Suite 203
Northampton, MA 01060

May · 2005

Dufresne-Henry

Dufresne-Henry, Inc., 136 West Street, Suite. 203, Northampton, MA 01060
Tel: (413) 584-4776 Fax: (413) 584-3157

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SECTION 1

SELF ASSESSMENT

The Town of Hadley received a General Permit for its Municipal Separate Storm Sewer System (MS4) on May 10, 2003. The Town filed its first Annual Report in compliance with the Phase II regulation in May of 2004. Since then, the Town, primarily through the efforts of its Highway Department, has proceeded in good faith to execute the tasks outlined in their original Notice of Intent, and those specified in the General Permit.

Meetings have been held between the Town's consultant engineer, Dufresne-Henry, Inc. (DH) and the Town Highway Department to continue to define the Town Storm Drainage System and refine the Storm Drainage Map. Although Michael Klimoski, Highway Department Superintendent, and the Town's consultant approached Selectmen in August 2003 to request that they establish a NPDES Steering Committee to shoulder the responsibility of creating a Stormwater Management Plan and carrying out responsibilities of the NPDES Permit, the Selectmen were unable to find enough interested residents to volunteer for the Committee. Since the Steering Committee is an important body for shaping and implementing the Stormwater Policy, progress has been slowed. In an attempt to mitigate this setback the Highway Superintendent, his assistant and the Town's consultant have formed an ad-hoc Steering Committee to pursue the responsibilities of the NPDES Steering Committee.

Over half of the 11 tasks outlined in the Notice of Intent to be performed in the first year of the permit (2003), were begun or have been implemented. This year (2004) half of the tasks not performed last year were completed or begun. Of the 14 tasks to be performed in the second year of the permit, nearly 70% have been completed or begun. To date, in addition to the time spent by Highway Department personnel, the Town has expended approximately $17,000 on outside consultants to comply with this mandate, including the initial permit application and the implementation. Approximately $7,000 is anticipated for the consultant

during the next fiscal year; however, only a small portion is actually under contract. Work in the third year of the program will concentrate on preparing and adopting Stormwater By-laws, continuing to verify and update the Storm System Plans, illicit discharge detection and elimination, and the continuation of public education and outreach measures.

DH feels that Hadley is continuing to live up to its responsibilities under the General Permit, and is achieving the measurable goals outlined in the Notice of Intent. Although the public has not shown the interest anticipated, the Town will continue to make efforts to improve public participation over the next calendar year.

SECTION 2

ASSESSMENT OF THE APPROPRIATENESS OF SELECTED BMP'S

To the extent they have been implemented to-date, the selected Best Management Practices (BMPs) seem to be satisfactory toward the reduction of pollution due to stormwater runoff. The Town was not completely satisfied with the response to certain measures, such as the formation of a NPDES Steering Committee, implementation of BMPs dealing the development of a Stormwater Management Program have begun and will continue in the establishment of illicit discharge and development by-laws.

Through its Highway Department personnel, the Town has continued to verify and make revisions to the Storm System Plan within the urban area.

Last spring's mass mailing of a Storm Drainage Fact Sheet does not seem to have yielded significant, measurable results, such as public comment or participation.

The television program "After the Storm" produced by the EPA and provided by the Weather Channel was aired on August 9 & 10, 2004 and has been aired periodically throughout the year on Hadley Cable Access Television. To our knowledge, comments have not been received on the program.

Municipal good housekeeping has continued to improve with the continued implementation of a spill prevention plan at the Department of Public Works (DPW) yard. The use of calcium chloride as a de-icer was increased this past winter which has continued to decrease the amount of salt contained in runoff to the Town's streams and wetlands.

An ad-hoc Steering Committee was formed September 28, 2004 to shape and implement the Town's Stormwater Policy. Meetings held to-date have centered on the drafting and implementation of the by-laws required by the Phase II Permit. Sample by-laws have been

reviewed and the Town has been in contact with the PVPC to prepared specific by-laws for Hadley. A proposal had been made by the PVPC and conditionally accepted by the Town, pending the receipt of a Small Growth Technical Assistance Grant. Unfortunately, Hadley was not awarded a grant during the last round of funding, but has reapplied for the current round and has received encouraging reports.

Prior to its formation, the members of the Steering Committee had discussed an approach to implement a dry weather screen program for illicit discharge detection. Initial field investigations were to begin in July or August 2004 with the onset of dry weather. Last summer, however, was exceptionally wet throughout those months and the inspections were postponed. New procedures are being drafted for this summer including the use of bacteria testing as the budget allows, and the use of both wet and dry weather inspections.

For the second year of the permit, the Highway Department has continued to substitute calcium chloride for some of its winter salt on Town roads. Quantitative effects are difficult to determine, but it is generally accepted that the environment does benefit from this practice, and the Highway Department will continue its use.

SECTION 3

PROGRESS TOWARD MEASURABLE GOALS

3.1 GOALS

The following measurable goals were proposed for implementation during the first and second years of this program:

1. Partnership with the Lake Warner-Mill River Steering Committee.
2. Distribution of a Stormwater Fact Sheet with the spring water bills.
3. Presentation of an informational video on Hadley Cable Access Television.
4. Establishment of a NPDES Steering Committee.
5. Partnership with the Massachusetts Highway Department to map the storm drainage within the Route 9 corridor.
6. Begin mapping the Town-owned Storm Drainage System within the Urban Area.
7. Dry weather screening and video inspection.
8. Establish illicit discharge hotline.
9. Drafting a by-law for the prevention of illicit discharges.
10. Drafting a by-law for disturbances of over one acre of land.
11. Drafting a by-law for the control of post-construction stormwater runoff.
12. Implement Spill Prevention Control Plan at the DPW yard.
13. Conduct training for maintenance and landscaping crews.
14. Incorporate the use of a road salt alternate for winter de-icing of roadways.

3.2 STATUS OF THE GOALS

The following is a brief explanation of the status of each of the above measurable goals:

1. Town Highway Department personnel are planning to meet with the Lake Warner – Mill River Steering Committee this summer to discuss mutually beneficial strategies.

2. A Fact Sheet pertaining to Urban Runoff was mailed in February 2004 with the bi-annual water bills.

3. The video entitled "After the Storm" has been received from the EPA. The video was aired on Hadley Cable Access Television twice in August 2004, as soon as the rights were received and then periodically throughout the year.

4. The Selectmen were unable to find volunteers for the Steering Committee; however, and ad-hoc Committee consisting of Highway Department personnel and the Town's engineering consultant, Dufresne-Henry, Inc. was formed in September 2004.

5. DH completed research of the Massachusetts Highway Department file of available drainage plans for Route 9.

6. DH completed researched of archived files and the Highway, Water and Sewer Department files for information on the Town's drainage system within the Urban Area. Additional information has been added to the Storm System Plan based on verification of pipes and structures by the Hadley Highway Department.

7. Preliminary procedures for a Dry Weather Screening Program were discussed for implementation last summer; however, unusual wet weather prevented the field inspections from taking place. The Town's consultant is presently preparing a more comprehensive screening program which could be undertaken without very dry weather.

8. Nothing done to-date.

9. Drafting a by-law for the prevention of illicit discharges. Sample by-laws have been reviewed by the Steering Committee and an application for a Small Growth Technical Assistance Grant has been re-applied for to finance the preparation of the by-law by the PVPC.

10. Drafting a by-law for disturbances of over one acre of land. See #9 above

11. Drafting a by-law for the control of post construction stormwater runoff. See #9 above

12. A Spill Prevention Program has been established and is in use at the DPW yard.

13. Nothing done to-date.

14. The Highway Department augmented the use of road salt with calcium chloride for deicing during the past two winters regulated by the permit.

SECTION 4

SUMMARY OF RESULTS

In summary, in the first two full years of permit compliance, the Town of Hadley has:

- Distributed a fact sheets on urban runoff to all households and businesses.
- Televised an educational stormwater video on its Cable Access Channel.
- Formed a Steering Committee to shape and implement the Town's Stormwater Policy.
- Prepared and continued to verify and revise a map for the Storm Drainage Inventory within the Town's urban area.
- Continues to prepare procedures for a Dry and Wet Weather Illicit Discharge Screening Program.
- Negotiate an agreement with the PVPC to prepare Stormwater By-laws for the Town.
- Applied for a grant to fund the preparation of the by-laws.
- Continued to implement a Spill Prevention Program at the DPW yard.
- Continued to reduce the amount of road salt used for deicing.

SECTION 5

LOOKING AHEAD TO NEXT YEAR

Next year the NPDES Steering Committee will approve procedures to inspect drainage outfalls for illicit discharge. Questions regarding entering private property to perform inspection must be addressed, and included in the illicit discharge bylaw. Empowering the Board of Health to assign designees to perform inspections may resolve this issue. The committee needs to have funds or town personnel committed to undertake these measures. If budgetary constraints can be overcome, Highway Department personnel, and consultants will begin a program of dry weather screening of drainage discharges this summer.

The Committee will need to secure funding to obtain professional assistance in the preparation of the by-laws required by the act. One grant has been identified and applied for. If the Town does not receive this grant for a second time, the Committee may have to consider requesting an appropriation from the Town; provide funds from the current operating budget, or performing the work with town employees.

Once draft by-laws are prepared, the Committee will be expected to begin holding public meetings to get input on a Town-wide Stormwater Management Program. Once input has been received, these by-laws, will require the approval of Town Meeting.

Beginning this spring, the Highway Department intends to open a discussion with the Lake Warner-Mill River Steering Committee so as to include them in the work of the NPDES Steering Committee.

The Hadley Cable Access television channel will continue broadcast "After the Storm" or other appropriate educational videos which can be obtained.

Throughout the year, Dufresne-Henry and the Highway Department will continue to verify and revise the Storm Drainage System Map through field investigation.

The NPDES Steering Committee, will investigate establishing an illicit discharge hotline, either at the Highway Department or with the Hadley Police or Fire Departments.

This summer and fall, the Highway Department will attempt to conduct pollution prevention workshops and training for municipal workers.

The Highway Department will continue to incorporate the use of a road salt alternative in greater amounts for deicing during the upcoming winter.

SECTION 6

CHANGES IN THE MEASURABLE GOALS

Certain goals originally scheduled for the first two years of the permit have been unavoidably postponed and are planned to begin this year. These goals include:

1. Partnership with the Lake Warner-Mill River Steering Committee..
2. Initiation of a dry weather screening program.
3. Public Hearings on Stormwater by-laws.
4. Establishment of an Illicit Discharge Hotline.
5. Training in pollution prevention for DPW workers.

Otherwise, the schedule for the upcoming year appears obtainable. Certain delays in establishing a NPDES Steering Committee have resulted in setbacks for the Committee to accomplish its objectives of preparing a Stormwater Management Program and adopting new by-laws, but things should proceed more smoothly if the grant applied for and other funding can be obtained.

SECTION 7

OUTSIDE ENTITIES RELIED UPON

The following agencies have been or will be relied upon for assistance in performing the measurable goals stated in the permit:

- Massachusetts Highway Department
- Lake Warner-Mill River Steering Committee
- Pioneer Valley Regional Planning Commission
- Hadley Police/Fire Departments