Town of Milford

Highway Department

Shelly A. Leclaire, Highway Surveyor

08/29/05

Ms. Thelma Murphy, Stormwater Coordinator
U.S. Environmental Protection Agency
Water Technical Unit
PO Box 8127
Boston, MA 02114

Dear Ms. Murphy:

Enclosed is the Town of Milford's Stormwater Annual Report. It is dated 4/21/05 as that is when the report had been completed and mailed to you. This time, it is being sent Certified Mail.

Please let me know if you have any questions.

Very Truly Yours,

Shelly A. Leclaire

Shelly A. Leclaire
Highway Surveyor

Rec'd 9-2-05

Front Street • Milford, Massachusetts 01757 • Tel. (508) 473-1274 • Fax (508) 634-2348

Municipality/Organization:	**Town of Milford, MA**
Permit Number:	**MAR041135**
Annual Report Number & Reporting Period:	**No. 2: March 04-March 05**

NPDES Phase II Small MS4 General Permit Annual Report

Part I. General Information

Contact Person: Shelly A. Leclaire	Title: Highway Surveyor
Telephone #: 508-473-1274	Email: Highway@MilfordMa.com

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: Shelly A Leclaire

Printed Name: Shelly A. Leclaire

Title: Highway Surveyor

Date: 4/21/05

Part II. Self-Assessment

The Town of Milford has completed the required self-assessment and has determined that our municipality is in compliance with the permit conditions. Discussions of the progress on BMPs toward the measurable goals, as well as quantification of some of the programs, are included in the following sections.

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 2 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 3
PE1	Brochures to educate public about stormwater pollution, pollution prevention, importance of reporting illicit dumping	Highway Dept.	Develop brochures in Permit Year (PY) 1. Produce and mail to residents in PY2.	Brochures targeting residents were developed by consultant based on customization of available EPA brochures and produced and mailed by the Town to 7,407 residences. Approximately 98 hours of labor and approximately $4,560 were spent on this effort, including brochure development by consultant.	Monitor goal of reduction in pollutants in catch basins, observed by catch basin cleaning crews.
Revised					
PE2	Brochures to educate business/industry regarding pollution prevention, material storage and handling, housekeeping, disposal practices	Highway Dept.	Develop brochure in PY1. Produce and mail to residents in PY2.	Brochures targeting businesses were developed by consultant based on customization of available EPA brochures and produced and mailed by the Town to 364 businesses. Approximately 5 hours of labor and approximately $636 were spent on this effort, including brochure development by consultant.	Monitor goal of reduction in pollutants in catch basins, observed by catch basin cleaning crews.
Revised					
PE3	Outreach program for local students, civic groups	Highway Dept.	Organize and implement round of presentations for local schools and at least one civic group.	Consultant developed and performed stormwater education PowerPoint presentation to all Milford 8th graders, approximately 350 students, on February 3, 2005, at Milford Middle School East, 45 Main Street, at cost of $2,545.	Organize and conduct at least one round of presentations to a civic group.
Revised					

1. Public Education and Outreach cont'd.

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 2 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 3
PE4	Educational material in library	Highway Dept.	Organize a group of materials regarding stormwater pollution and make available at library.	Weather Channel Program "After The Storm" hand delivered to Town Library on 4/27/04; Stormwater education brochures and posters (developed by consultant at cost of $710) hand delivered to Library, Board of Selectmen, Town Clerk, Board of Health, 6 Milford schools, Milford Sewer Dept., and Milford Water Co. on 1/11/05; PDF of brochures and links to stormwater education sites programmed into Town of Milford web site on 1/11/05, and hard copy of stormwater education presentation slides hand delivered to Library on 3/30/05. Letter sent on 3/30/05 to Milford Water Company requesting stormwater message on next series of water bill mailings.	Add to and update collection of materials.
Revised	*Educational materials in Town Hall and other locations*	Highway Dept.	Hang posters and have materials available in Town Hall.		

2. Public Involvement and Participation

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 2 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 3
PP1	Community cleanup	Highway Dept.	Form volunteer group for annual cleanup. Hold cleanup day and record participants.	Cleanup conducted in the summer of 2004 by inmate community service group to clear brush and debris from local brooks.	Continue annual cleanup days to reduce amount of debris/trash along waterways and roadways. A letter was sent on 3/30/05 to Town Administrator requesting Prison inmate scheduling for summer 2005 for clean up of debris along edges of roads and brooks. Also, an Earth Day cleanup has been scheduled with the Scouts for Plains Park.
Revised					
PP2	Scrap metal and used motor oil recycling	Highway Dept.	Continue to offer recycling program. Record amount of material collected.	Program is ongoing and maintained by the Board of Health. 2,000 gallons of automotive motor oil collected during calendar year 2004. 1640 tons of materials recycled from March 2004 through February 2005, including 557 tons of scrap metal/white goods during calendar year 2004.	Continue to offer program and record amounts of materials collected.
Revised					
PP3	Hazardous waste dropoff days	Highway Dept.	Continue to offer semi-annual dropoff program and record amount of material collected.	Program is ongoing and maintained by the Board of Health. 388 auto batteries, 6 5-gallon pails of household batteries, 4100 pounds of electronics, 315 linear feet of fluorescent bulbs, 15 cubic yards of latex/oil based paint, and 1524 mercury containing devices collected during calendar year 2004. All materials, except for latex/oil based paint, were collected every Thursday through Saturday. Latex/oil based paint was collected all Saturdays in April through November.	Continue to offer dropoff program and record amount of material collected.
Revised					

2. Public Involvement and Participation cont'd.

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 2 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 3
PP4	Public meeting	Highway Dept.	Hold public meeting to present proposed bylaw/ordinances for input prior to implementation by end of PY1.	Stormwater Action Plan and Illicit Discharge Detection Plan presented to Board of Selectmen at public meeting on October 4, 2004.	Hold public meeting for stormwater bylaw. The final draft will be presented to the Board of Selectmen by May. Upon approval of the final draft, it will be put on the warrant for town vote at the next scheduled Town meeting, most likely in the fall.
Revised			Public meeting may also discuss stormwater pollution prevention.		

3. Illicit Discharge Detection and Elimination

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 2 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 3
IDD1	Storm Sewer Map	Highway Dept.	Seek Town Meeting funding in PY1. Complete map in PY2.	Outfall mapping completed by consultant August 2004, at cost of $8,000. A total of 293 outfalls were mapped.	Task complete. Mapping will be reviewed on an annual basis for updates, corrections, deletions, etc.
Revised					
IDD2	IDDE program development, identification of problem areas, correction of issues.	Highway Dept.	Conduct outfall sampling in PY2. Number of illicit discharges to be removed in PY3, 4, 5.	IDDE plan formulation completed August 2004. Dry-weather field screening begun by consultant Fall of 2004. Work on hold throughout winter due to frequent precipitation/snow melt. To date, 103 outfalls have been inspected and 17 were observed flowing during dry weather and sampled. Note that Town has conducted extensive IDDE investigations along the Charles River as recently as 1997. 45 outfalls were screened during this time.	Goal to finish dry-weather field screening during spring/summer PY3 and interpret results for subsequent tracing and removal of illicit discharges.
Revised					
IDD3	IDDE program documentation.	Highway Dept.	Submit annual report, including information on IDDE program steps.	Annual report is hereby submitted.	Future PY annual reports will include information on IDDE program tasks.
Revised					
IDD4	Storm drain stenciling program, focusing on drains tributary to ponds and known dumping areas. Program extended to brook drains as feasible.	Highway Dept.	Percentage/number of storm drains stenciled annually. Records of catch basin cleaning showing decreased dumping/pollutants in catch basins.	Catch basin stencil purchased August of 2004 at cost of $90.	Begin catch basin stenciling in Summer of 2005, as weather permits. Labor will likely be performed by Highway Department staff. Records of catch basin stenciling to be maintained.
Revised					

3. Illicit Discharge Detection and Elimination cont'd.

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 2 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 3
IDD5	Regulation prohibiting non-stormwater discharges to municipal system.	Highway Dept.	Development and implementation of regulation during PY2.	Sections on Prohibition of Illegal Discharges, Prohibition of Illicit Connections, and Waste Disposal Prohibitions included in Stormwater Management bylaw, drafted by consultant at cost of $3,880. It has been reviewed by the Town, revised, and is under final review by the Engineering Department.	Adopt bylaw by end of PY3. The final draft will be presented to the Board of Selectmen by May. Upon approval of the final draft, it will be put on the warrant for town vote at the next scheduled Town meeting, most likely in the fall of PY3.
Revised					

4. Construction Site Stormwater Runoff Control

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 2 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 3
CR1	Regulation for erosion/sediment controls, BMPs, construction controls	Highway Dept.	Development and establishment of regulation.	Stormwater Management bylaw requiring stormwater management permit for construction activities disturbing greater than 1 acre drafted by consultant at cost of $3,880. Permit requires Stormwater Management and Erosion and Sediment Control Plan, requirements described by accompanying Guidance Document. The bylaw has been reviewed by the Town, revised, and is under final review by the Engineering Department.	Adopt bylaw by end of PY3. The final draft will be presented to the Board of Selectmen by May. Upon approval of the final draft, it will be put on the warrant for town vote at the next scheduled Town meeting, most likely in the fall of PY3.
Revised					
CR2	Mechanism for site plan review, inspections, review procedures	Highway Dept.	Establishment of procedures and number of plans reviewed annually.	Stormwater Management bylaw drafted by consultant at cost of $3,880 includes procedures for review and approval of stormwater permits and inspections. It has been reviewed by the Town, revised, and is under final review by the Engineering Department.	Adopt bylaw by end of PY3. The final draft will be presented to the Board of Selectmen by May. Upon approval of the final draft, it will be put on the warrant for town vote at the next scheduled Town meeting, most likely in the fall of PY3. Records to be kept of number of plans reviewed.
Revised					

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 2 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 3
PCR1	Regulation for BMPs	Highway Dept.	Develop and adopt regulation, measure compliance (# of BMPs, % compliance, etc).	Stormwater Management bylaw drafted by consultant at cost of $3,880 includes Stormwater Management Performance Standards and projects are required to meet the Massachusetts Stormwater Management Policy. Accompanying Guidance Document outlines detailed requirements. The bylaw has been reviewed by the Town, revised, and is under final review by the Engineering Department.	Adopt bylaw by end of PY3. The final draft will be presented to the Board of Selectmen by May. Upon approval of the final draft, it will be put on the warrant for town vote at the next scheduled Town meeting, most likely in the fall of PY3. Document compliance records through number of BMPs, fines, etc.
Revised					
PCR2	Regulatory mechanism for BMP operation and maintenance (O&M)	Highway Dept.	Regulation development and adoption; maintenance of inspection reports.	Stormwater bylaw drafted by consultant at cost of $3,880 includes Operation, Maintenance, and Inspection Schedule requirements for privately-owned facilities, and assigns maintenance responsibility. It has been reviewed by the Town, revised, and is under final review by the Engineering Department.	Adopt bylaw by end of PY3. The final draft will be presented to the Board of Selectmen by May. Upon approval of the final draft, it will be put on the warrant for town vote at the next scheduled Town meeting, most likely in the fall of PY3. Maintain records of O&M plans, inspection reports submitted, etc.
Revised					

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 2 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 3
MGH1	Street sweeping	Highway Dept.	Continue street sweeping program, note reduction in sediments in catch basins, quantities of material collected.	Street sweeping conducted April – July of 2004: 2,730± cy collected at cost of $18,226 and 1,040 hrs of labor. Second round of street sweeping conducted August 2004: 540 cy collected at cost of $3,090 and 160 hours of labor. All accepted streets were swept.	Continue program for all PYs.
Revised					
MGH2	Catch basin cleanouts	Highway Dept.	Continue catch basin cleanout program. Record number of catch basins cleaned, sediment collected.	The Town conducted annual catch basin cleanouts in Fall of 2004 via a contractor. 3079 catch basins were cleaned and a total of 2,400 cubic yards of material removed. Total cost of $19,680 and 68 hours of labor. Consultant developed a letter supporting catch basin cleaning and met with Selectmen to secure funding for future years.	Continue program for all PYs.
Revised					
MGH3	Record keeping/schedule of maintenance	Highway Dept.	Continue to keep listing of regular maintenance activities, schedules, and procedures.	Compilation of maintenance records in spreadsheet detailing work performed, dates, labor, cost, and other details. File started to organize budget, invoice receipts, fleet maintenance records, brook maintenance, Park department's fertilizer/pesticide application, catchbasin cleaning/repair, hazardous waste manifests, etc. Examples of records: Summer of 2004-Highway Dept seasonal employees cleared brush along the brook walls and removed debris from brooks for Godfrey and O'Brien Brooks at cost of $5,280 and 576 hours of labor. Other work performed on Godfrey Brook by hired contractors including repair of brook walls and tree removal at cost of $26,200. Letter requesting submittal of fleet maintenance records sent to various Town departments in January of 2005. Responses from Police, Fire, and Park Departments, Milford schools, cemetery, and Highway Department explaining Fleet maintenance practices.	Continue to maintain records and update program as needed.
Revised					

6. Pollution Prevention and Good Housekeeping in Municipal Operations cont'd.

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 2 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 3
MGH4	Recycling and waste disposal program	Highway Dept.	Continue recycling and waste disposal program for municipal operations. Record quantities involved in program.	Program ongoing. 6,938 tons of mulched lawn waste collected in Fall of 2004 from 120 miles of Town streets at cost of $43,200 and 288 hours of labor.	Continue program through all permit years.
Revised					
MGH5	Waste disposal/housekeeping training and practices	Highway Dept.	Continue proper disposal procedures, conduct training, keep logs of material disposal.	Seminar regarding lawn waste, compost, fertilizer, and pesticide disposal conducted for 20 Highway and Park Department employees on November 30, 2004. Letter requesting submittal of fleet maintenance records sent to various Town departments in January of 2005 included good housekeeping tips.	Continue program through entire permit term.
Revised					
MGH6	Identification, inspection, maintenance of Town owned BMPs	Highway Dept.	Inspection and maintenance of structures, maintain records.	Town owned detention basins inspected, outlets emptied as needed. Comprehensive list of detention basins and inspection checklist developed by consultant for use in regular inspections, at cost of $820. Godfrey Brook inlet grates checked and cleaned monthly and after large storms ($227). A total of 57 catch basins were repaired or replaced at a cost of $27,360. 385 gallons of oil/water removed from oil/water separator at the Highway Department Garage by North Country Environmental on March 8, 2005.	Continue program. Begin maintaining detention basin inspection records.
Revised					

Part IV. Summary of Information Collected and Analyzed

The Town has finished the process of GPS locating its stormwater outfalls. A total of 293 outfalls have been located. The outfall locations were mapped using GIS.

The quantities of materials accepted by the Town's recycling programs are recorded by the Board of Health and have been included in the following section.

Part V. Program Outputs & Accomplishments

Education, Involvement, and Training

Stormwater education materials collected and available at library	(y/n)	YES
Clean-up days held	(#)	1
Household Hazardous Waste Recycling		
▪ material collected (automotive waste oil)	(gal)	2000
▪ material collected (household paint)	(gal)	3030
▪ annual recycling (March 2004-February 2005 (inclusive))	(tons)	1640

Legal/Regulatory

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

Mapping and Illicit Discharges

Number of outfalls mapped to date	(#)	293
Estimated or actual number of outfalls	(#)	293 (100%)
Mapping/Survey method(s)	type	GPS and CAD/GIS
Outfalls inspected/screened during dry weather	(#)	148 (51%)
Estimated % of population on sewer	(%)	80
Estimated % of population on septic systems	(%)	20

Operations and Maintenance

Average frequency of catch basin cleaning (non-commercial/non-arterial streets)	(times/yr)	1
Average frequency of catch basin cleaning (commercial/arterial or other critical streets)	(times/yr)	1
Total number of structures cleaned	(#)	3079
Total amount of material removed from structures	(cubic yards)	2400
Disposal or use of sweepings (landfill, POTW, compost, recycle for sand, beneficial use, etc.)		registered landfill
Disposal of yard waste		Composted and used by Parks and Highway Dept.

Average frequency of street sweeping (non-commercial/non-arterial streets)	(times/yr)	2
Average frequency of street sweeping (commercial/arterial or other critical streets)	(times/yr)	2
Disposal of sweepings (landfill, POTW, compost, beneficial use, etc.)	(location)	registered landfill

Anti-/De-Icing products	material	NaCl and limited $CaCl_2$
Salt pile(s) covered in storage shed(s)	(y/n)	Yes