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2005 MAY -3 AM 8:22

April 28, 2005

U.S. Environmental Protection Agency
Water Technical Unit
P.O. Box 8127
Boston, MA 02114

Subject: NPDES Permit No. MAR041194
MADEP Transmittal No. W035262
NPDES PII Small MS4 General Permit Annual Report
Town of Dracut, Massachusetts

Dear Sir or Madam:

On behalf of the Town of Dracut, we are submitting one original signed copy of the NPDES Phase II Small MS4 General Permit Annual Report No. 2 for the reporting period of March 2004 through March 2005.

An original signed copy is also being submitted to Massachusetts Department of Environmental Protection, Division of Watershed Management.

If you have any questions, or require any additional information, please feel free to contact us at your convenience.

Very truly yours,

Katherine E. Goyette

Katherine E. Goyette, P.E.
Project Engineer
Camp Dresser & McKee Inc.

cc: Dennis Piendak – Town Manager, Dracut
Glen Edwards – Assistant Town Manager, Dracut
Michael Buxton – Director of Public Works, Dracut
William Meserve - CDM

Municipality/Organization: Dracut, MA

EPA NPDES Permit Number: MAR041194

MaDEP Transmittal Number: W-035262

Annual Report Number & Reporting Period: **No. 2: March 04-March 05**

NPDES PII Small MS4 General Permit Annual Report

Part I. General Information

Contact Person: Glen Edwards Title: Assistant Town Manger

Telephone #: 978-453-4557 Email: atm-planner@dracut-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: Glen Edwards

Printed Name: Glen Edwards

Title: Assistant Town Manager/Town Planner

Date: April 28,2005

Part II. Self-Assessment

The Town of Dracut has completed the required self assessment and has determined that our 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 2 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 3
1-1	Make Brochures Available at DPW and Public Libraries	DPW	Assess existing brochures and identify data gaps	Brochures distributed and available at Conservation recreation office, library, and public works office. Added information on stormwater to Town website	Continue to distribute brochures and evaluate additional avenues for educating the public.
1-2	Annual update of Stormwater Management Plan	DPW	Update of the SWMP in Annual Report and at Selectmen's meeting	An update of the SWMP was included in the 2005 Annual report and presented at the Selectman's meeting on 3/22/05.	Annual practice will continue.

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
2-1	Comply with State Public Notification Guidelines at MGL Chapter 39 Section 23B	Town Clerk	Notices posted in the Town Hall and current locations throughout permit term.	Notices for Town Meetings have continued to be posted in Town Hall and current locations.	Notices will continue to be posted.

2-2	Hold Annual Household Hazardous Waste Day	DPW and Board of Health	Hazardous waste collection day to be held annually, and communicated to the public in advance.	Hazardous waste collection day held on 9/18/04. A flyer was distributed to the public in advance listed what items were appropriate to bring,, along with advertisements in local newspapers, and notice on the Town website.	This years' annual event is scheduled for Fall 2005. Notice will be communicated to the publics in advance.
2-3	Stencil catch basins with "don't dump" message	DPW	Stencil catch basins during years 2 through 5.	70 catch basins which discharge directly to lakes and ponds were stenciled.	An additional 50 catch basins will be stenciled by March 2006.

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
3-1	Map stormwater outfalls and receiving waters.	DPW	A GIS layer will be added to the town's Geographic Information System (GIS) showing all outfalls by the end of the first permit year .	BMP completed Year 1.	
3-2	Enforce existing storm sewer bylaw	DPW and Board of Heath	Bylaw maintained and enforced throughout permit term.	Bylaw maintained and enforced through year 2. One illegal discharge was discovered over this year and has been corrected.	Continue to maintain and enforce bylaw
3-3	Develop and implement a program to identify non-stormwater discharges to the MS4	DPW and Board of Health	Plan developed during first year of permit term and implemented in remainder of permit term.	160 outfalls were inspected during Year 2. In total, 278 outfalls have been inspected over the past 2 years. 150 outfalls remain to be inspected.	The remaining 150 outfalls will be inspected during year 3.

3-4	Develop and implement a program to remove illicit discharges to the MS4	DPW and Board of Health	Plan developed during first year of permit term. Plan implemented and maintained during remainder of permit term.	As part of dry weather screening program detailed above, water quality field sampling will be conducted at each stormwater outfall where flow was observed. 50 outfalls have been scheduled for dry weather sampling this summer.	Once sampling has been completed, investigate any illicit discharges in outfall areas. Develop a plan for removal of the illicit connections.
3-5	Continue to enforce bylaw requiring inspection of new construction for correct connection to sanitary sewer.	DPW and Board of Health	Bylaw maintained and enforced throughout permit term.	Bylaw maintained and enforced throughout year 2.	Continue to maintain and enforce bylaw

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
4-1	Continue to Apply Standard 8 of the Massachusetts Stormwater Policy to all Construction Projects within the Jurisdiction of the Conservation Commission	Conservation Commission	Standard 8 of the Massachusetts Stormwater Policy applied to all Construction Projects within the Jurisdiction of the Conservation Commission throughout permit term.	Developed Building checklist to accompany the Building permit which includes an approval from the Conservation Commission indicating all permits are filed and appropriate erosion controls are proposed.	The Conservation Commission will continue to apply these Standards.

4-2	Develop and Present Bylaw to Require an Erosion and Sediment Control Plan, Waste Management Plan, and Plan Review for Sites Disturbing More Than One Acre	Planning, Conservation Commission, DPW	Draft bylaw during first year of permit term. Present bylaw in spring 2004, and each spring thereafter until passed.	Since DEP no longer requires communities to adopt bylaws, the Town developed a regulation to be adopted under the Conservation Commission requiring an Erosion and Sediment Control Plan. The draft regulations are currently under Town Counsel review.	A Public Hearing will be held on the new regulation for adoption under the Conservation Commission in year 3.
Revised			Develop regulation in year 2 to be adopted under the Planning Board in year 3.		
4-3	Develop Procedure for Receipt and Consideration of Public Comment	Conservation Commission	Procedure developed during first year of permit term and implemented throughout remaining permit term.	Town has provided opportunity for public comment through Town's website, Town Hall posting of public meetings, public participation in public meetings and hearings.	Public comment procedures will be maintained in year 3.
4-4	Check Erosion Control Measures and Construction Material Management on Site Inspection	Conservation Commission	Develop checklist during first year of permit term. Site inspections updated during spring 2004. Updated site inspection procedure implemented throughout remaining permit term.	Conservation Commission staff served as site inspectors to check erosion control measures.	Site inspections continue to be updated and changes implemented in year 3.

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

5-1	Develop Bylaw to Apply Standards 2, 3, 4, 7 and 9 of the Massachusetts Stormwater Policy (MSP) to Entire Town.	Task Force (DPW, Engineering, and Conservation)	Develop a draft bylaw by the end of the first permit term. Present annually to Town Meeting until passed	Conservation Commission applies Standards of MSP to projects under their jurisdiction.	Will continue this practice in year 3.
Revised			Per DEP's letter on 4/12/04, communities are no longer required to adopt bylaws.		
5-2	Specify a Stormwater BMP Manual	Task Force (DPW, Engineering, and Conservation	Specify a stormwater BMP manual to be included in a draft bylaw by the end of the first permit year.	Reviewed three existing stormwater BMP manuals. Selected the "Massachusetts Erosion and Sediment Control Guidelines for Urban and Suburban Areas".	BMP completed.
5-3	Develop Bylaw to Ensure Long-Term Maintenance of Private Structural BMPs	Task Force (DPW, Engineering, and Conservation)	By the end of the first permit term, include provisions in the bylaw for long-term BMP maintenance. Present the draft bylaw annually to the Town Meeting until passed.	DPW inspected 39 town BMPs year 2 and performed any necessary routine maintenance. Private basin owners are required to secure bonds and submit annual reports on the condition and maintenance of the basins.	Will continue this practice in year 3.
	Revised		Per DEP's letter on 4/12/04, communities are no longer required to adopt bylaws.		
5-4	Develop Procedures to Ensure Existing Structural BMPs Are Adequately Preventing or Minimizing Impacts to Water Quality	Task Force (DPW, Engineering, and Conservation)	Create BMP inventory and maintenance plan.	Inventory of structural BMPs developed in year 1 as part of GIS effort (BMP 3-1). DPW annual inspection of BMPs identifies need for necessary improvements. Forwarded to engineering for review.	Prioritize any necessary modifications and secure funding.

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
6-1	Identify Sensitive Receptors (such as wetlands, beaches, etc.) within the Town	Conservation Commission	During first year of permit term, develop the list and give select DPW staff a 30-minute training session about the location of sensitive receptors, and why special protection is needed.	List of Sensitive Receptors developed year 1 and training completed.	Staff will continue to be updated on locations of sensitive receptors and the importance of protection.
6-2	Continue Annual Catch Basin Cleaning Program	DPW	Continue current program each spring.	Continued program in Spring 2004.	Continue program in Spring 2005.
6-3	Continue Annual Street Sweeping Program	DPW	Sweep streets in town annually each spring .	Annual street sweeping program conducted from April to July 2004.	Continue program in Spring/Summer 2005
6-4	Maintain Cover over Salt Storage Area	DPW	Continue program throughout permit term.	The Town continued to maintain cover over salt storage area.	The Town will continue to maintain cover over salt storage area.
6-5	Develop/Implement Employee Education Program	DPW	Four hours of training for relevant employees each year of the permit	Public works employees attended hazardous materials safety training which discussed handling, storage, and disposal.	The Town will implement a general training for all public works employees focusing on all the BMPs of the SWMP.
6-6	Use Good Housekeeping Practices for Storing Hazardous Materials, Including Training	DPW	Begin inventory by the end of the first year of the permit term.	An inventory of all current hazardous materials used by the DPW was created year 1 and updated year 2.	DPW will maintain and update hazardous material inventory.

6-7	Minimizing Chemicals in Park, Public Playing Field, and Landscape Maintenance	DPW	Continue to minimize the use of chemicals throughout permit term.	Maintenance records were kept for the amount of chemicals used throughout the permit term.	DPW will continue to minimize the use of chemicals and maintain records of chemical used.
Addition	Conduct DPW Site Assessment	DPW		Funds have been secured in year 2 to conduct an environmental site assessment of DPW yard to evaluate stormwater run-off and storage and control of materials.	Conduct site assessment year 3 and summarize findings.
Addition	Attend Storm Water Management Training	Planning, Engineering		Town Planner and Town Engineer attended EPA Storm Water Management training on 4/8/2005.	

Part IV. Summary of Information Collected and Analyzed

As required under Article 29 of the Modified Final Judgment (1997), the Town is required to do monthly sampling at 28 catch basins and storm drains and 9 culverts and brooks to identify locations where fecal coliform contamination is present. Sampling conducted from March 2004 to November 2004. Terminated with outfall inspections under BMP #3-3.

During the Summer season, the Board of Health conducts weekly sampling of all beaches around Long Pond, Fleur De Lis Beach, Lake Muscuppic, and Peters Pond.