S E A Consultants Inc.
Scientists/Engineers/Architects

April 28, 2005

Ipswich

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

RE: Town of Ipswich – NPDES Annual Report No. 2
S E A Reference No.: 2003008.05-A

Dear Sir/Madam:

Enclosed is the NPDES Phase II Small MS4 General Permit Annual Report (Permit Year 2) for the Town of Ipswich, Massachusetts. As required, the report has been signed and certified by an authorized representative of the community.

Questions pertaining to the report may be directed to Robert Gravino, Department of Public Works Director, at 978-356-6612.

Respectfully yours,

S E A CONSULTANTS INC.

Betsy C. Frederick, CHMM
Project Manager

cc: Robert Gravino, Town of Ipswich
file

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Municipality/Organization: **Town of Ipswich, MA**

EPA NPDES Permit Number: **MA041199**

MaDEP Transmittal Number: W 063563

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: Mr. Robert Gravino Title: Director, Dept. of Public Works

Telephone #: 978-356-6612 Email: robertg@town.ipswich.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: James W. Foley

Printed Name: Mr. James W. Foley

Title: Chairman, Board of Selectmen

Date: April 25, 2005

Part II. Self-Assessment

The Town of Ipswich has completed the required self-assessment and has determined that our municipality is in compliance with all permit conditions. Specific considerations were given to the following:

Part II.B.8 – The Town initiated a road and street drain improvement project, portions of which are within the 200' Riverfront Area of the Ipswich River and areas subject to the jurisdiction of the Ipswich Conservation Commission. The local drainage system discharges to the Ipswich River. Physical conditions do not allow groundwater recharge or infiltration as part of the project design. Although a "limited project" under the Wetlands Protection Act regulations, the Town is installing multiple stormwater treatment units as part of the design to reduce the primary pollutants of concern discharged to the Ipswich River, specifically sediments and other solids, in order to meet Massachusetts Stormwater Management Policy guidelines.

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	Procurement/Development of educational material	DPW Director	Procure or adapt four brochures for distribution and posting in subsequent permit years.	Further public education activities were delayed this year due to cost concerns. DPW has worked through public meetings and other forums to describe the program intent and execution to community groups. Published material distribution will be readdressed in permit years 3 - 5.	Distribution to targeted audiences – for years 3 – 5. Improvement of stormwater information available through web page and specific linkage to educational material themes.
Revised			Will post through existing stormwater page with link through Cons. Commission		
Revised				Several additional educational efforts have been undertaken. Information is provided in DPW's Ipswich Recycling Calendar regarding household hazardous waste days and other general information appropriate to the management of household waste. A new Town Recycling Committee has been formed to increase environmental awareness. The Committee contributes a weekly column to the local newspaper on issues of environmental concern. Finally, the DPW provides news releases to the local news media regarding issues of household waste management and recycling.	

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 - 5
2-1	Conduct joint Household Hazardous Waste and Oil/Paint Collection Day	BOH with DPW Director	Conduct one joint day annually and an additional oil-based paint (plus tires, batteries, fluorescent bulbs) collection day conducted by DPW alone.	Conducted joint collection day on October 2, 2004. The DPW ran a separate household hazardous waste collection day for the limited materials listed on May 15, 2004.	Household hazardous waste collection days are scheduled annually in the Spring and Fall.
Revised					
Revised					
Revised					

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 outfalls and receiving waters	DPW Director with Utilities Director	Develop system for informing all public departments of changes in MS4 resulting from new development or re-dev.; field verify ICPCC mapping and Parker River Watershed Outfall Mapping.	Scope of work has been developed with Dept. of Public Works for Standard GIS Data Requirements to be utilized by all Town Departments when new development or re-development activities proposed. The new standards will facilitate update of all mapping information in asset management inventory database to be accessible by all Town Departments. Outfall mapping for entire community is underway. Estimated completion date is May 2005. In addition to mapping outfalls, condition assessment will be performed on all accessible outfalls, for integration into eventual asset management database.	Preliminary mapping based on documentary data has been completed and field verification and mapping is underway. Scope of work has been developed for GIS data layer development for entire drainage system, including all other assets such as catch basins, manholes, and piping. Anticipate initiating that activity in Permit Year 3.
Revised					
3-2	Detect and eliminate illicit discharges	DPW Director	Develop Illicit Discharge Detection and Elimination Plan; dry weather discharge evaluation of the top priority area.	Outfall mapping (see above) includes condition assessment and dry weather discharge evaluation. Estimated completion date for preliminary inventory evaluation is May 2005. Further investigations will be undertaken prior to phased capital improvements program.	Town is addressing illicit discharges as pavement management and drainage improvement projects are undertaken. Green Street, Summer Street, Water Street, and County Street in the vicinity of Town Hall are scheduled for rehabilitation during which time illicit discharges in the area will be addressed.
Revised					
3-4	Develop Bylaw Prohiting Illegal Dumping of Non-SW into MS4	DPW Director	Develop Draft By-law.	Draft general by-law has been developed which includes permitting of sump pumps in order to allow DPW and/or Building Inspector access to private property for periodic inspections.	By-law was prepared for Annual Town Meeting but withdrawn for further evaluation by Town Departments regarding potential cost impacts of implementation. The By-law is expected to be reconsidered for the next Town Meeting.
Revised					

3-5 Revised	Develop Regulations and Policies to Enforce By-law	DPW Director	Policies and Regulations		Potential system for instituting permits and permit condition enforcement is anticipated for Years 4 – 5.

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	Revise Site Plan Review By-law	Planning Director	Draft amendment to the Site Plan Review section of the Zoning By-law for review of projects > 1 acre.	Preliminary draft of an amendment to the by-law regarding site plan review is under discussion. Planning Board has also researched options to address projects of less than 1 acre, which make up the majority of projects undertaken in the town. Need to determine if changes will be proposed as new general by-law, or amendment to existing zoning by-law.	Continued efforts to refine amendments for both > and < 1 acre projects.
Revised			PB intends to draft by-law that will address projects of < 1 acre as well.		
4-2	Improve Site Plan Review Process	DPW Director	Draft revised process and tracking tool.	Based on discussions between the DPW and the Planning Board, the Planning Board's engineering design consultant incorporated DPW-specific concerns related to stormwater BMP operation and maintenance issues into their protocol for Planning Board site plan reviews. Review comments are provided to the DPW electronically for approval and further comment. DPW concerns must be part of the site developers' response to PB comments.	Continue to implement the new process and improve upon as experience provides opportunities.
Revised					
4-3	Procedures for Receipt of Public Information	Planning Director	Review existing procedures for consideration of improvements or compliance with Phase II.	Existing procedures under review.	This process is intended to complement the review described above. When that process has been further clarified, the appropriate means for soliciting and documenting public input will be developed. Anticipate this to take place during Year 3.
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
5-1	Post-Construction Run-off By-law	Planning Director	Complete Draft by-law by end of Permit Year 2. Develop associated regulations and guidance in year 3.	A Draft by-law was to be developed during this permit year. Thus far, no by-law has been developed for consideration. This will be a focus for the upcoming year.	Develop draft by-law and associated regulations and guidance documents.
5-2.1	DPW Review of Structural BMPs	DPW Director	Draft procedure for evaluation of BMP's from O& M perspective.	Plan to incorporate this process into site plan review procedures for MCM 4. Thus far, that site plan review process has not been definitively determined. Informal processes have evolved, but are not intended to suffice for this BMP.	Plan to finalize procedure and implement process.
Revised					
5-2.2	Establish Funding Mechanism for O&M of structural BMPs.	DPW Director	Investigation of potential funding mechanisms.	DPW and Planning Director have not yet investigated opportunities for funding and therefore have not yet had public meeting to present and draft into warrant article.	Propose to undertake this activity in Permit Year 3.
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
6-1	Educate Municipal Employees	DPW Director	Annual Storm Water Training Sessions	Material for training session was to be developed in this permit year, however, such training has not yet taken place.	Training program will be completed and implemented.
Revised					
6-2	Develop and Implement Municipal Operations Stormwater Plan	DPW Director	Develop and Adopt the plan by the end of Permit Year 2.	Scope of Work has been developed for an asset management system to address drainage infrastructure construction and maintenance.	Conduct initial database development and mapping for the drainage system as baseline for development of an operations and maintenance plan.

7. BMPs for Meeting Total Maximum Daily Load (TMDL) Waste Load Allocations (WLA)

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
	Not Applicable – No TMDL's have been approved for any Waters within the Town of Ipswich.				
Revised					