



## ACTON BOARD OF HEALTH

Douglas Halley  
Health Director

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Acton, MA 01720

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May 31, 2006

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

To Whom It May Concern:

Attached with this letter please find Acton's third Annual Report in compliance with its NPDES Phase II Small MS4 General Permit. This report in two volumes contains the following information:

1. A self-assessment review of compliance with the permit conditions.
2. An assessment of the appropriateness of the selected BMP's.
3. An assessment of the progress towards achieving the measurable goals.
4. A summary of results of any information that has been collected and analyzed.
5. A discussion of activities for the next reporting cycle.
6. A discussion of any changes in identified BMP's or measurable goals.
7. Reference to any reliance on another entity for achieving any measurable goal.

Should you have any questions regarding the Town of Acton's NPDES Phase II Small MS4 Annual Report or the information attached please contact me at (978) 264-9634.

Sincerely,

  
Doug Halley  
Health Director

Cc: Massachusetts Department of Environmental Protection  
Division of Watershed Management  
627 Main Street  
Worcester, MA 01608

**Municipality/Organization:** Town of Acton

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**EPA NPDES Permit Number:** MAR041238

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**MaDEP Transmittal Number:** W-

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**Annual Report Number  
& Reporting Period:** No. 1: May 06-May 07

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## NPDES PII Small MS4 General Permit Annual Report

### Part I. General Information

**Contact Person:** Doug Halley **Title:** Health Director

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**Telephone #:** (978) 264-9634 **Email:** dhalley@town.acton.ma.us

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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:**

Don P. Johnson

**Title:**

Town Manager

**Date:**

4/30/05

**Part II. Self-Assessment**

The Town of Acton has completed the required self-assessment and have determined that the Town is in compliance with all permit conditions, except for the following provisions:

**Part 2. PP-3 Due to Personnel turnover within the Recreation Department the Town was unable to schedule the Storm Water Poster Contest for youth groups at NARA. Contest will be held in Year 4.**

**Part 3. ID-3 The Town was still unable to obtain a grant to fund the Watershed Health Monitoring And Management Plan. The Town will continue to seek and identify grants that would fund the Plan.**

**Part III. Summary of Minimum Control Measures**

**1. Public Education and Outreach**

<b>BMP ID #</b>	<b>BMP Description</b>	<b>Responsible Dept./Person Name</b>	<b>Measurable Goal(s)</b>	<b>Progress on Goal(s) – Permit Year 3 (Reliance on non-municipal partners indicated, if any)</b>	<b>Planned Activities – Permit Year 4</b>
PE-1	<i>Partner w/Local Organization</i>	Board of Health Health Director	Provide financial contribution to Partner w/ SUASCO WCC	Continue participation in the SUASCO Watershed Community Council’s “Storm Water Community Assistance Program” for Storm Water Phase II Permit Year 3 from July 2006 to June 2007.	Continue commitment to participate in the SUASCO Watershed Community Council’s “Storm Water Community Assistance Program” for Storm Water Phase II Permit Year 4 from July 2007 to June 2008.
Revised					
PE-2	<i>Develop Public Education Brochures/Flyers</i>	Board of Health Health Director	Prepare/Distribute Storm Water Awareness Survey	Two survey respondents received Stormwater Umbrellas at a public presentation as thanks for their participation. SUASCO provided a Media Toolkit.	Stormwater Flyer will be sent out to Community Business’. Use SUASCO Media Toolkit to establish Stormwater publicity with the media
Revised					

PE-3	<i>Structural BMP Education</i>	Board of Health Health Director	No Goal Established for Year One	Two Best Management Practice Signs completed adjacent to constructed wetland that filters Stormwater to NARA public swimming area.	Opening Celebration for the North Acton Recreation Area (NARA) constructed wetland BMP.
Revised					
PE-4	<i>Incorporate Storm Water into Public Meetings – Provide electronic media outlet.</i>	Information Technology IT Director	Schedule Selectmen's Meeting to discuss Storm Water Management Plan (to be shown live on cable and taped for rebroadcast).	On May 23, 2005 the Board of Selectmen were updated on the NPDES Permit. They discussed the schedule of tasks, the anticipated costs and the potential of volunteer organizations assistance. The meeting was televised and re-televised one week later. A video tape is available for future showings.	Continue meeting with the Board of Selectman annually with televised replays.
Revised					

**1a. Additions**

PE-5	<i>Incorporate Stormwater Education into School Lesson Plans</i>	School Curriculum Director/ Health Director	Work with A/B School System to implement Lesson Plan developed by SUASCO	Implement Stormwater Matters Lesson Plan for 5 <sup>th</sup> or 6 <sup>th</sup> grade.	Implement Stormwater Matters Lesson Plan for 5 <sup>th</sup> or 6 <sup>th</sup> grade.
PE-6	<i>Develop Stormwater presentation</i>	Health Director	Identify audience for presentation	Develop a "Stormwater Matters" Power Point presentation	Work with local groups to present presentation
PE-7	<i>Pesticide Awareness</i>	Health Director	Public Awareness	Implemented TURI pesticide awareness project that distributes	Maintain project

## 2. Public Involvement and Participation

<b>BMP ID #</b>	<b>BMP Description</b>	<b>Responsible Dept./Person Name</b>	<b>Measurable Goal(s)</b>	<b>Progress on Goal(s) – Permit Year 3</b> (Reliance on non-municipal partners indicated, if any)	<b>Planned Activities – Permit Year 4</b>
PP-1	<i>Partner with Local Organization</i>	Board of Health Health Director	Provide financial contribution to partner with SUASCO WCC	On March 8, 2006 the SUASCO Watershed Community Council provided the deliverables for Year 3 from July 2005 to June 2006.	Continue commitment to participate in the SUASCO Watershed Community Council's "Storm Water Community Assistance Program" for Storm Water Phase II Permit Year 4 from July 2006 to June 2007.
Revised					
PP-2	<i>Place traveling display at various locations</i>	Board of Health Health Director	Place display provided by SUASCO at one location throughout the year.	Stormwater Educational Boards continue to be displayed in the main entrance way to the Town Hall above the Isaac Davis Plow.	Continue to place display provided by SUASCO at one location throughout the year.
Revised					
PP-3	<i>Poster/Photo Contests</i>	Recreation Department Recreation Director	No Goal Established for Year One	Hold a Storm Water poster contest for Youth Groups at NARA. Hold Stormwater Photo Contest for Youth Groups at NARA.	
Revised					

PP-4	<i>Organize Public Meetings/Panels</i>	Board of Health Health Director	Discuss Storm Water at one public meeting every year.	On May 23, 2005 the Board of Selectmen were updated on the NPDES Permit. They discussed the schedule of tasks, the anticipated costs and the potential of volunteer organizations assistance.	Continue to discuss Storm Water at one public meeting every year.
Revised					
PP-5	<i>Stream Identification Signs</i>	Board of Health Health Director	OAR volunteers & Town installed Stream Identifications signs.	Stream Identification Signs placed at stream and street intersections were maintained in conjunction with Acton's Stream Team. The 13 locations were placed online at <a href="http://www.actonstreams.org">http://www.actonstreams.org</a> .	Maintain signs and website.
Revised					

**2a. Additions**

PP-6	<i>Regional Stormwater Participation</i>	Health Director	Identify & Participate in Regional events.	Did a Stormwater Presentation with EPA and DEP at MHOA Annual Conference	Continue to identify and participate in Regional events.
PP-7	<i>Citizen Involved Storm Water Programs</i>	OAR Assabet River Stream Watch	Provide Nashoba River Stream Quality Gauge	OAR maintained a water quality gauge at Nashoba Brook. Acton Stream Team had a 2006 Acton Earth Day Display titled "Who's Swimming in Acton Streams" at the St. Matthews Methodist Church, Acton	Maintain Public Education Gauge. Continue involvement with Acton Stream Teams, OAR and SUASCO.

### 3. Illicit Discharge Detection and Elimination

<b>BMP ID #</b>	<b>BMP Description</b>	<b>Responsible Dept./Person Name</b>	<b>Measurable Goal(s)</b>	<b>Progress on Goal(s) – Permit Year 3</b> (Reliance on non-municipal partners indicated, if any)	<b>Planned Activities – Permit Year 4</b>
ID-1	<i>Drainage Mapping</i>	Board of Health Health Director	Prepare draft drainage map with watershed delineations.	Field verified 25% of the existing catch basins and updated Stormwater Map based on the findings of the field verification..	Field verify an additional 25% of the existing catch basins and update Stormwater map based on those findings.
Revised					
ID-2	<i>Develop/Implement Illicit Discharge Bylaw</i>	Board of Health Health Director	No Goal Established for Year One	The Board of Health reviewed its regulations again and began a series of advertised hearings modified them accordingly.	Continue to review Board of Health regulations and recommend modifications that would address illicit discharge issues.
Revised					
ID-3	<i>Perform Illicit Discharge Detection Campaign</i>	Board of Health Health Director	Submit grant proposal for funding of Acton Watershed Health Protection Program to identify potential problem areas.	Alternative grant sources for funding of “Watershed Health Monitoring and Management Plan” not available. New focus of grant funding for “Implementation of Decentralized Management Concepts” and “Small-Scale Micro-watershed Stormwater Management”.	Seek alternative grant sources for funding of “Implementation of Decentralized Management Concepts” and “Small-Scale Micro-Watershed Stormwater Management”
Revised					
ID-4	<i>Correct Illicit Discharges</i>	Board of Health Health Director	No Goal Established for Year One	No action taken in year three.	No Goal Established for Year Four.
Revised					

**3a. Additions**

ID-5	<i>On-site Wastewater Impacts</i>	Board of Health Health Director	Analyze on-site Wastewater Impacts.	The Town completed Town-wide Comprehensive Water Resources Management Plan CWRMP which identified needs areas, as well as recommended solutions.	Begin the implementation of the recommendations of the CWRMP.
ID-6	<i>Stream Survey</i>	Health Director	Document stream conditions	Acton Stream Team developed an on-going Stream Survey for the major brooks within Acton.	Continue on-going Stream Survey through Acton Stream Team.

**4. Construction Site Stormwater Runoff Control**

<b>BMP ID #</b>	<b>BMP Description</b>	<b>Responsible Dept./Person Name</b>	<b>Measurable Goal(s)</b>	<b>Progress on Goal(s) – Permit Year 3 (Reliance on non-municipal partners indicated, if any)</b>	<b>Planned Activities – Permit Year 4</b>
CS-1	<i>Develop/Implement Construction Site Runoff Control Program</i>	Planning Board Town Planner	Review Construction Regs. Revise appropriately	The Planning Department completed an In-House Assessment of the current status of construction site runoff control Program.	Based on the Planning Department's In-House Assessment the Planning Board will address deficient control of construction site runoff.
Revised					
CS-2	<i>Develop/Implement Erosion And Sediment Control Bylaw</i>	Planning Board Town Planner	Review Construction Regs. Revise appropriately	The Planning Department completed an In-House Assessment of the current status of the Erosion and Sediment Control Bylaws, Rules and Regulations.	Based on the Planning Department's In-House Assessment the Planning Board will modify their regulations accordingly.
Revised					

**4a. Additions**

CS-3	<i>Ecological Landscaping</i>	Acton Stream Team		AST develop ecological landscaping info; post on-line	No Goal Established for Year Four.
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### 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 3 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 4
PC-1	<i>Develop/Implement Post Construction Runoff Control Program</i>	Planning Board Town Planner	No Goal Established for Year One	The Planning Department completed an In-House Assessment of the current status of Post Construction Runoff Control.	Based on the Planning Department's In-House Assessment the Planning Board will modify their program accordingly.
Revised					

#### 5a. Additions

PC-2	<i>Municipal Code &amp; Ordinance Analysis</i>	MIT Graduate Student Thesis	Thesis Submittal	MIT Students gave a public presentation of a Thesis entitled "Encouraging Low-Impact-Development Stormwater-Management Practices: Assabet River Watershed Sub-Basin Case Study". A major component of the thesis was a Municipal Code & Ordinance Analysis.	MIT students to conduct a LID test cell project.
PC-3	<i>Landscape Initiative</i>	New England Wild Flower Society	Sudbury Foundation Report	NEWFS developed a report that addressed Ecological Landscape Community Initiatives in the Towns of Acton and Sudbury.	Review recommendations for Priority Landscape-Related Issues, Demonstration Project Sites, Educational Programming, Leverage and Regulatory Ordinances and Guidelines.

## 6. Pollution Prevention and Good Housekeeping in Municipal Operations

<b>BMP ID #</b>	<b>BMP Description</b>	<b>Responsible Dept./Person Name</b>	<b>Measurable Goal(s)</b>	<b>Progress on Goal(s) – Permit Year 3</b> (Reliance on non-municipal partners indicated, if any)	<b>Planned Activities – Permit Year 4</b>
GH-1	<i>Reporting</i>	Public Works Director of Public Works Board of Health Health Director	Create a method to record storm water activities for Good Housekeeping and all Minimum Control Measures (MCM's)	Department of Public Works recorded all Stormwater Management Activities, reassessed eligibility criteria and provided a yearly report as required.	Record all storm water management activities, reassess eligibility criteria and provide yearly report as required in the General Permit Part II.F.
Revised					
GH-2	<i>Audit Current Town Facilities</i>	Public Works Director Of Public Works	No Goal Established for Year One	Wastewater Treatment Facility conducted Slope, Stability & Erosion Report and performed preventative maintenance of the gravity sewers by a "Jet Vac" process.	DPW and Natural Resources will conduct and audit and submit a report.
Revised					
GH-3	<i>Operation and Management Program</i>	Public Works Director of Public Works	Create list of priority outfalls and complete 1 <sup>st</sup> round of outfall cleaning and track records for catch basins cleaned.	Health Department in conjunction with DPW and MMCP tracked outfalls cleaned. Health Department in conjunction with DPW tracked catch basins cleaned.	Continue to track records for outfalls cleaned. Continue to track records for catch basins cleaned. Implement BMP to reduce the materials placed on streets and thereby reducing the schedule for street sweeping.
Revised					

GH-4	<i>Employee Training</i>	Public Works Director of Public Works	6.4.1 Conduct a department meeting on pollution prevention 6.4.2 Generate a list of all prior relevant employee training activities.	DPW performed an evaluation of a new snow and ice removal program. Program eliminated, to the extent feasible, sand in the fight against snow and ice during winter. Reduction in sand will decrease the ability of pollutants from entering the Stormwater.	Continue to monitor and evaluate the new snow and ice removal program.
Revised					
GH-5	<i>Recycling Program</i>	Public Works Director of Public Works	Review Current Recycling Program & Determine/Implement changes as needed.	Life After NESWC Committee recommended recycling program enhancements for the Town. A Post-Closure Use Permit was received from DEP. Hazardous Waste Day was held twice.	Recommendations of Life After NESWC will continue to be implemented in FY 07.
Revised					

**6a. Additions**

GH-6	<i>Household Hazardous Waste</i>	Board of Health Health Director	Generate Hazardous Waste Guide	Board of Health distributes Guide to all targeted populations within the Town.	Continue to distribute Guide to targeted populations within the Town.
GH-7	<i>Stream Maintenance</i>	Acton Stream Team	Annual Clean-up	Acton Stream Team conducted Rail Trail Clean-up & Acton Clean-up Day	Continue annual Clean-up Days
GH-8	<i>Watershed Improvement</i>	Acton Water District	Watershed Improvement for targeted Public Well	Watershed Improvement Grant submitted to and accepted by EOEa.	Begin EOEa Watershed Improvement Grant Project.

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

<b>BMP ID #</b>	<b>BMP Description</b>	<b>Responsible Dept./Person Name</b>	<b>Measurable Goal(s)</b>	<b>Progress on Goal(s) – Permit Year 3</b> (Reliance on non-municipal partners indicated, if any)	<b>Planned Activities – Permit Year 4</b>
TMDL-1	<i>Check Current Impairment List.</i>	Board of Health Health Director	There are No completed studies for receiving waters in Acton.	Draft Total Maximum Daily Load (TMDL) Report for Total Phosphorus in the Assabet River (Report # MA 82B-01-2004-01) was made available for public comment. Implementation of Report has only partially begun. Draft report has not identified new implementation requirements for receiving waters in Acton.	Check list annually to determine new implementation requirements.
Revised					

**7a. Additions**


#### **Part IV. Summary of Information Collected and Analyzed**

1. **Stream Monitoring Program**
  - a. Four rounds of fecal coliform testing in 2004 were conducted at locations in the Fort Pond Brook and Nashoba Brook Watersheds as shown on the map. (see attachment "A")
2. **Groundwater Well Monitoring Program**
  - a. Monthly rounds of water level and nitrate testing in 2004 were conducted within selected watersheds as shown on the map. (See attachment "B")
3. **North Acton Recreational Area (NARA) Pond Monitoring**
  - a. Weekly Ecoli testing was conducted between May and September at NARA to ensure swimming water quality. (See attachment "C")
4. **Household Hazardous Waste Day Collection**
  - a. Residential participation at the May and September Household Hazardous Waste Day Collections was mapped by watershed. (See attachment "D")
5. **Alternative Wastewater Treatment Program**
  - a. The Board of Health has permitted over three dozen alternative treatment systems in environmentally sensitive areas that are required to provide quarterly or annual effluent monitoring results. (See attachment "E")
6. **Promote and Distribute Environmental Maps**
  - a. The Department of Environmental Protection provided a "Guiding Land Conservation for Biodiversity in Massachusetts" and "Guiding the Protection of Freshwater Biodiversity in Massachusetts" maps (see attachment "F"). Maps have been placed on the Town's web site and used as an educational tool.
7. **Hazardous Material Storage Monitoring Program**
  - a. The Health Department inspects all commercial facilities that store more than 25 pounds or 25 gallons of hazardous materials or wastes to ensure materials are being stored in proper secondary containment and that releases to the environment are not occurring (see attachment "G").