MAY 90028 82006 AM

May 1, 2006

Ms. Ann Herrick (CIP)
U. S. Environmental Protection Agency
One Congress Street
Boston, MA 02114

MAY - 8 2006

Re: NPDES Stormwater General Permit
2005-2006 Annual Report
Town of Franklin, MA

Dear Ms. Herrick:

Enclosed for your records is the NPDES Stormwater General Permit 2005-2006 Annual Report for the Town of Franklin, MA. The Annual Report has simultaneously been filed with the Massachusetts DEP.

If you have any questions or require any additional information, please do not hesitate to call me at 508-520-4910 or our Consultant, Rich Niles with Comprehensive Environmental Inc. at (800)725-2550 ext. 307.

Sincerely,

Town of Franklin, Massachusetts

Robert Cantoreggi
DPW Director

cc: Massachusetts Department of Environmental Protection, Boston Office
Rich Niles, Comprehensive Environmental Inc.

Enclosure – NPDES Phase II Small MS4 General Permit 2005-2006 Annual Report

Municipality/Organization: Town of Franklin

EPA NPDES Permit Number: MAR041117

MaDEP Transmittal Number: W- 041238

Annual Report Number
& Reporting Period: No. 3: May 1, 2005-April 30, 2006

NPDES PII Small MS4 General Permit Annual Report

Part I. General Information

Contact Person: Robert Cantoreggi Title: DPW Director

Telephone #: (508) 520-4910 Email: rcantoreggi@franklin.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:

Printed Name: Jeffrey D. Nutting

Title: Town Administrator

Date:

Part II. Self-Assessment

The Town of Franklin has completed the required self-assessment and has determined that our municipality is in compliance with all permit conditions, except for the following provision:

1. Schedules have been modified for Illicit Discharge Detection and Elimination, Construction and Post Construction, and Pollution Prevention and Good Housekeeping BMPs. Schedule modifications are shown in Section III.

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 3	Planned Activities – Permit Year 4
1A	Recycling Education for Home Owners	DPW/Solid Waste Coord.	Distribute 3 times/year	A mailer is sent to residents on a quarterly basis. The mailer discusses proper waste disposal & recycling practices.	Continue to send mailer 3-4 times per year.
Revised		Environmental Affairs Specialist			
1B	Education Information on the Web Site	DPW/Solid Waste Coord.	Web Site Information developed and posted for year 2	A link was created on the DPW web page for rain barrels discussing the improved environmental and stormwater benefits. The rain barrels were offered at a reduced cost to residents as part of a DEP grant. Detailed recycling and waste disposal information (including an instructional video) is posted on the Town's recycling web page.	A dedicated web page will be developed for stormwater education on the town's website at www.franklin.ma.us
Revised		Environmental Affairs Specialist	Web page developed in year 4		
1C	Education on Waste Disposal & Water Conservation	DPW/Solid Waste Coord.	Materials Available in all Public Buildings	✱ Rain barrel sale & flyers were posted ✱ A local engineering firm published a press release in the Milford Daily News on June 20, 2005 discussing the stormwater benefits of rain gardens at a private demonstration site in Town. ✱ A press release on water conservation practices was published in March 2006 ✱ Recycling mailers sent quarterly to residents ✱ Periodic web site postings ✱ E-mail address provided for citizen inquiries recycle@franklin.ma.us) dpw@franklin.ma.us	Continue Year 3 activities in addition to: ✱ Broadcast content on local cable channel ✱ Display educational material at Town Events
Revised		Environmental Affairs Specialist			

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 3	Planned Activities – Permit Year 4
1D	Water Resource Information and Protection Signs	DPW/Solid Waste Coord.	Five Signs Posted/Year beginning in year 3	No progress occurred on this task during the permit year.	Develop and post 5 signs at priority resource areas.
Revised		Environmental Affairs Specialist	Begin posting signs in year 4		
1E	Public Education with Charles River Watershed Association	DPW Director & Solid Waste Coord.	Number of Coordinated Programs	The grant with the Charles River Watershed Association (CRWA) was not awarded. However, the Town began coordinating a stormwater workshop with CRWA.	Continue to coordinate public education efforts and pursue grant opportunities with the CRWA. Host a stormwater educational workshop with CRWA to discuss the impacts of stormwater runoff and methods for improvement.
Revised		Environmental Affairs Specialist	# attendees & audience		

1a. No Addition at this time.

2. Public Involvement and Participation

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 3	Planned Activities – Permit Year 4
2A	Storm Drain Stenciling		Average Ten Catch Basins/Year	No progress occurred on this task during the permit year.	Stencil 50 Storm Drains with local Youth Organizations in the highest priority watersheds in Town.
Revised		DPW			
2B	Outreach Efforts with Charles River Watershed Association	DPW Director, Solid Waste Coordinator & Conservation	Number of Coordinated Programs	Efforts to coordinate a local pond & stream cleanup event were unsuccessful. However, the Town began coordinating a stormwater workshop with CRWA.	Host a stormwater educational workshop with CRWA and conduct site walks to involve participants. Solicit volunteers for a local pond & stream cleanup event at the stormwater workshop.
Revised		Environmental Affairs Specialist			
2C	Public Meetings to Encourage Volunteers	DPW Director, Solid Waste Coordinator & Conservation	Meetings held with the Public Starting Year 2	No progress occurred on this task during the permit year.	Create a Stream Team with local youth organizations and schools at workshops and other community events. Solicit volunteers at the stormwater workshop (BMP 2B).
Revised		Environmental Affairs Specialist	One meeting annually		

2a. Additions

2D	Community Assistance Program	DPW	Evaluation correspondence	The Town evaluated the use of SuAsCo Stormwater Community Assistance Program, tailored to Charles River Watershed. Educational materials were purchased.	Develop program needs and incorporate materials into public education/outreach and participation/involvement BMPs, as appropriate.
2E	Establish a Stormwater Telephone Hotline	To be determined.	Record number of phone calls to hotline, copies of advertisements.	The DPW generally receives calls related to stormwater and handles any problems that arise. The DPW cleaned a retention pond in response to public calls regarding debris and litter (see BMP 6I).	Establish a hotline number and advertise on the Town website and with existing educational materials.

3. Illicit Discharge Detection and Elimination

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 3	Planned Activities – Permit Year 4
3A	Storm Water Map Development	DPW Director, Town Engineer, Highway Dept, Chas H. Selles	Completed Map Showing Collection System Outfalls	The storm drain system map and GIS database was updated based on aerial photographs. Headwalls, culverts and outfalls were located to the best extent possible. Field maps from 2003 were located and work began to enter drainage system information into the GIS database.	Continue to update the drainage map and GIS data with existing field maps and future mapping information (e.g., BMP 3D).
Revised		GIS Manager, Jim Fritz			
3B	Develop Non-Storm Water Discharge Ordinance	DPW Director, consultant	Ordinance Adopted by Town	Four meetings were held for bylaw development. A draft stormwater bylaw was prepared to meet the Phase II requirements for illicit discharge prohibition.	Finalize the bylaw based on Town Counsel review and present to public at the Fall 2006 Town Meeting.
Revised			Draft bylaw at Town Meeting in year 4		
3C	Develop Illicit Detection Implementation Plan	DPW Director, consultant	Plan Developed	A draft Illicit Discharge, Detection Implementation Plan (IDDE) plan was prepared in March 2006.	Review and finalize the IDDE plan. Begin implementing the plan as part of BMP 3D.
Revised					
3D	Perform Dry Weather Outfall Assessments	DPW Director, consultant	Prioritized Areas and Number of Outfalls Assessed	69 stormwater outfalls have been identified at this time, based on aerial photographs. Dry weather outfall assessments were not performed during the permit year.	Stormwater outfalls in the highest priority subwatersheds will be evaluated for potential illicit discharges in accordance with the final IDDE Plan (BMP 3C).
Revised					

3E	Develop Procedures for Removing Illicit Connections	DPW Director, Consultant	Procedures Developed and Number of Locations Identified	Procedures for the removing illicit discharges have been included in the draft bylaw and IDDE plan (BMPs 3B and 3C).	Finalize procedures and document the progress of removing identified illicit discharges.
Revised					

3a. Additions.

3F	Setup and Advertise a Hotline for Illicit Discharges	To be determined.	Log of Complaints and Action Taken.	The DPW generally receives calls related to stormwater and handles any problems that arise. No calls related to illicit discharges were received.	Coordinate with BMP 2E and establish a stormwater hotline for illicit discharges. Advertise the hotline on the Town website and with existing educational materials.

4. Construction Site Stormwater Runoff Control

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 3	Planned Activities – Permit Year 4
4A	Ordinance Development for Waste Control	DPW Director, Town Engineer, Conservation, Planning, Consultant	Ordinance Adopted by Town	Four meetings were held for bylaw development. A draft stormwater bylaw was prepared to meet the Phase II requirements for construction site stormwater runoff control.	Finalize the bylaw and associated BMPs based on Town Counsel review and present to public at the Fall 2006 Town Meeting.
Revised			Draft bylaw at Town Meeting in year 4		
4B	Formalization of Site Plan Review Procedures	DPW Director, Town Engineer, Conservation, Planning, Consultant	Site Plan Review Procedures Adopted by Town	This BMP has been incorporated into the work discussed under BMP 4A, as part of the draft stormwater bylaw.	Refer to BMP 4A.
Revised					
4C	Revised Ordinance to Address Storm Water Pollution	DPW Director, Town Engineer, Conservation, Planning, Consultant	Revised Ordinance Adopted by the Town	This BMP has been incorporated into the work discussed under BMP 4A, as part of the draft stormwater bylaw.	Refer to BMP 4A.
Revised					

4D	Best Management Practice Manual for Developers	DPW Director, Town Engineer, Conservation, Planning, Consultant	Handbook Completed and Adopted by Town	The DPW and Engineering Department use the MA Stormwater Management Policy Guidebook as a reference for erosion control requirements.	Evaluate the need to develop a construction site BMP manual specific to Franklin. Incorporate the final document (handbook) into the bylaw by reference, as appropriate.
Revised		Environmental Affairs Specialist			
4E	Formalization of Inspection Procedures	DPW Director, Town Engineer, Conservation, Planning, Consultant	Inspection Procedures Adopted by Town	A sample checklist was prepared as part of the bylaw work discussed under BMP 4A.	Refer to BMP 4A.
Revised		Building Inspector			

4a. Additions.

4F	Establish a Procedure for the Receipt of Information Submitted by the Public	DPW Director, Town Engineer, Conservation	Record number of phone calls to hotline, copies of articles advertising the hotline.	The DPW generally receives calls related to stormwater and handles any problems that arise. No calls related to construction sites were received.	Coordinate with BMPs 2E & 3F to establish a stormwater hotline.

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	Planned Activities – Permit Year 4
5A	Procedures for Long Term O&M	DPW Director, Town Engineer, Conservation, Planning, Consultant	Adoption of Procedures by Town	Four meetings were held for bylaw development. A draft stormwater bylaw was prepared to meet the Phase II requirements for post construction stormwater management. The draft bylaw incorporates procedures for long term O&M.	Finalize the bylaw and associated BMPs based on Town Counsel review and present to public at the Fall 2006 Town Meeting.
Revised			Draft bylaw at Town Meeting in year 4		
5B	Review Procedures for Post Construction Impacts	DPW Director, Town Engineer, Conservation, Planning, Consultant	Adoption of Procedures by Town	This BMP has been incorporated into the work discussed under BMP 5A, as part of the draft stormwater bylaw.	Refer to BMP 5A.
Revised					

5C	Best Management Handbook for Developers	DPW Director, Town Engineer, Conservation, Planning, Consultant	Handbook Completed and Adopted by Town	The DPW and Engineering Department use the MA Stormwater Management Policy Guidebook as a reference for BMP design.	Evaluate the need to develop a BMP design manual specific to Franklin. Incorporate the final document (handbook) into the bylaw by reference, as appropriate.
Revised		Environmental Affairs Specialist			

5a. Additions

5D	Establish a Procedure for the Receipt of Information Submitted by the Public	DPW and Conservation Planning	Record number of phone calls, and copies of letters and other correspondence.	The DPW generally receives calls related to stormwater and handles any problems that arise. The DPW cleaned a retention pond in response to public calls regarding debris and litter (see BMP 6I).	Coordinate record keeping program with the development of the post-construction stormwater ordinance, track calls and records of enforcement.

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 3	Planned Activities – Permit Year 4
6A	Standard Operating Procedures	DPW Director/Division Heads	Ten Procedures Developed	No progress occurred on this task during the permit year.	Review existing procedures and develop recommendations for pollution prevention and housekeeping improvements. Incorporate the results of BMP 6H and develop procedures for addressing water quality improvements for flood control projects.
Revised		Environmental Affairs Specialist	List of current O&M procedures		
6B	Employee Training	DPW Director/Division Heads	Four Employee Training Sessions	An outline for the pollution prevention and good housekeeping training program was reviewed for Public Works employees.	Training is scheduled to occur before June 2006.
Revised			Annual training, attendance sheet and copy of program		
6C	Parking Lot and Road Sweeping	DPW Director/Division Heads	Schedule Developed and Areas Prioritized for Cleaning	Continued routine street sweeping program. All streets are swept once a year and the downtown area is swept twice a year.	The Town is planning to purchase a new street sweeper to assist with cleaning schedules.
Revised					

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 3	Planned Activities – Permit Year 4
6D	Spill Response and Prevention	DPW Director/Division Heads	Procedures and Inventory Completed	The Spill Prevention Control and Countermeasure (SPCC) plan for the highway facility was revised.	SPCC training is scheduled to occur before June 2006.
Revised					
6E	Catch Basin Cleaning	DPW Director/Division Heads	Schedule Developed and Areas Prioritized for Cleaning	Continued routine Catch Basin cleaning. Each basin is cleaned once a year.	Develop a schedule for catch basins in need of more frequent cleaning and review disposal options.
Revised					

6a. Additions

6F	Municipal Facilities and Operations Evaluation	DPW & Consultant	Record of inspections, recommendations and improvements. Pollution prevention inspection checklist.	The Town obtained a scope and funding to complete the evaluation.	Evaluate municipal facilities and operations for pollution prevention options and begin implementing recommendations.
6G	Low Impact Design for DPW Roadway & Drainage Projects	DPW Director, Town Engineer	Record of final or as-built plans and improvements.	After Town review, the roadway and utility reconstruction project at Southgate Road was redesigned to reduce the roadway impervious surface by approximately 30,000 ft^2.	Construct the Southgate Road project as designed and continue to evaluate roadway and drainage projects for stormwater LID design or retrofit opportunities.
6H	BMP Evaluation and Identification of Needed Retrofits	DPW Director, Town Engineer, Consultant	Database of BMPs, owners, O&M requirements, inspection forms.	The Town obtained a scope and funding to complete the evaluation.	Evaluate BMPs in Town for retrofit opportunities, maintenance requirements and constraints. A comprehensive database and O&M template will be developed to track future inspections and maintenance.
6I	Stormwater BMP Maintenance & Drainage System Upgrades	DPW	Record of cleaning activities, # structures cleaned annually	A sediment forebay design was reviewed for the Brook Street drainage system that discharges to Shephard's Brook and the Charles River. In February 2006, the DPW removed approximately 6 cubic yards of trash and debris from a retention pond near Dover and Beaver Streets.	A sediment forebay will be constructed for the Brook Street drainage system to improve stormwater quality. Incorporate the results of BMP 6H and implement improvements as funding allows.

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

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
Revised					

7a. Additions

7A	Evaluate Data and TMDL for the Charles River and Develop a Plan to Improve TMDL Waters	DPW, Conservation, Environmental Affairs Specialist, Consultant	Copy of Water Quality Improvement Plan	Scheduled to begin in year 4.	Review the TMDL Study for the Charles River and the results of BMP 3D to determine problem areas within the watershed and potential causes of impairment. Develop recommendations for further investigations and a course of action to address the impaired water quality.
7B	Implement Water Quality Improvement Plan for discharges to 303(d) waters.	DPW, Conservation, Environmental Affairs Specialist	Photographs, logs, and BMP descriptions for completed efforts and water quality improvements	Scheduled to begin in year 5.	Scheduled to begin in year 5.

7b. WLA Assessment

The Draft TMDL Report for the Charles River will be reviewed as part of BMP 7A with recommendations incorporated, as appropriate. Overall, the Franklin SWMP appears to be consistent with the recommendations of the Draft TMDL Report for the Charles River to reduce bacterial loading. Water quality concerns associated with 303d waters will be addressed through the implementation of BMPs under the six minimum measures for Phase II. Additionally, the 303d waters in Franklin are located in subwatersheds identified as a high priority for SWMP implementation activities and field inspection of outfalls will begin first in these areas.

Part IV. Summary of Information Collected and Analyzed

- Number of Outfalls Mapped: 69
- 6 cubic yards of trash & debris removed from a retention basin
- 1 roadway project for LID and 1 BMP retrofit design for sediment removal

Part V. Program Outputs & Accomplishments (OPTIONAL)

Programmatic

Stormwater management position created/staffed	(y/n)	Yes*
Annual program budget/expenditures	($)	

*Environmental Affairs Specialist

Education, Involvement, and Training

Estimated number of residents reached by education program(s)	(# or %)	100%
Stormwater management committee established	(y/n)	
Stream teams established or supported	(# or y/n)	
Shoreline clean-up participation or quantity of shoreline miles cleaned	(y/n or mi.)	
Household Hazardous Waste Collection Days		
▪ days sponsored	(#)	
▪ community participation	(%)	
▪ material collected	(tons or gal)	
School curricula implemented	(y/n)	

Legal/Regulatory

	In Place Prior to Phase II	Under Review	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	
▪ Post-Development Stormwater Management			X	

Mapping and Illicit Discharges

Outfall mapping complete	(%)	
Estimated or actual number of outfalls	(#)	69
System-Wide mapping complete	(%)	50%
Mapping method(s)		
▪ Paper/Mylar	(%)	75%
▪ CADD	(%)	
▪ GIS	(%)	25%
Outfalls inspected/screened	(# or %)	
Illicit discharges identified	(#)	
Illicit connections removed	(#) (est. gpd)	
% of population on sewer	(%)	
% of population on septic systems	(%)	

Construction

Number of construction starts (>1-acre)	(#)	
Estimated percentage of construction starts adequately regulated for erosion and sediment control	(%)	
Site inspections completed	(# or %)	
Tickets/Stop work orders issued	(# or %)	
Fines collected	(# and $)	
Complaints/concerns received from public	(#)	

Post-Development Stormwater Management

Estimated percentage of development/redevelopment projects adequately regulated for post-construction stormwater control	(%)	
Site inspections completed	(# or %)	
Estimated volume of stormwater recharged	(gpy)	

Operations and Maintenance

Average frequency of catch basin cleaning (non-commercial/non-arterial streets)	(times/yr)	
Average frequency of catch basin cleaning (commercial/arterial or other critical streets)	(times/yr)	
Total number of structures cleaned	(#)	
Storm drain cleaned	(LF or mi.)	
Qty. of screenings/debris removed from storm sewer infrastructure	(lbs. or tons)	
Disposal or use of sweepings (landfill, POTW, compost, recycle for sand, beneficial use, etc.)		
Cost of screenings disposal	($)	
Average frequency of street sweeping (non-commercial/non-arterial streets)	(times/yr)	
Average frequency of street sweeping (commercial/arterial or other critical streets)	(times/yr)	
Qty. of sand/debris collected by sweeping	(lbs. or tons)	
Disposal of sweepings (landfill, POTW, compost, beneficial use, etc.)	(location)	
Cost of sweepings disposal	($)	

Vacuum street sweepers purchased/leased	(#)	
Vacuum street sweepers specified in contracts	(y/n)	

Reduction in application on public land of: ("N/A" = never used; "100%" = elimination)		
▪ Fertilizers	(lbs. or %)	
▪ Herbicides	(lbs. or %)	
▪ Pesticides	(lbs. or %)	

Anti-/De-Icing products and ratios	% NaCl % $CaCl_2$ % $MgCl_2$ % CMA % Kac % KCl % Sand	50:50 sand/salt mix
Pre-wetting techniques utilized	(y/n)	
Manual control spreaders used	(y/n)	
Automatic or Zero-velocity spreaders used	(y/n)	
Estimated net reduction in typical year salt application	(lbs. or %)	
Salt pile(s) covered in storage shed(s)	(y/n)	Yes
Storage shed(s) in design or under construction	(y/n)	