Municipality/Organization: Dracut, MA

EPA NPDES Permit Number: MAR041194

MADEP Transmittal Number: **W035262**

Annual Report Number
& Reporting Period: **No. 4: April 1, 2006 – March 31, 2007**

NPDES Phase II Small MS4 General Permit Annual Report

Part I. General Information

Contact Person: Glen A. Edwards Title: Assistant Town Manager/Town Planner

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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: Glen A. Edwards

Printed Name: Glen A. Edwards

Title: Assistant Town Manager/Town Planner

Date: April 23, 2007

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 4 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 5
1-1	Make Brochures Available at DPW and Public Libraries	DPW	Assess existing brochures and identify data gaps.	EPA Brochures distributed and available at the following Dracut locations: ■ Conservation office. ■ Recreation office. ■ Public library. ■ Public Works office. Maintained stormwater information on the Town's website. Created brochure to educate public on the Town's future sewer expansion program. Added sewer brochure to the Town's website (See Appendix A). Created stormwater pollution prevention bookmark as a public education piece (See Appendix B). Bookmarks available at the following Dracut locations: ■ Conservation office. ■ Recreation office. ■ Public library. ■ Public Works office.	Continue to distribute brochures that are currently in use, and evaluate additional avenues for educating the public.

1. Public Education and Outreach (Cont'd)

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 4 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 5
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 2007 Annual report and presented at the Selectman's meeting on 03/27/07. This meeting was televised live on the Town's local cable access channel, and reaired on several occasions in the weeks that followed.	A yearly update of the SWMP will be made and will be included in future Annual Reports to the Town. These annual updates will be presented at Selectman's meetings and be made available to the public via the Town's local cable access channel.

2. Public Involvement and Participation

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 4 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 5
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 (62 Arlington Street) and at other appropriate locations within the Town.	Notices for Town Meetings will continue to be posted in Town Hall and at other appropriate locations within the Town.
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.	Two household hazardous waste collection days were held jointly by the Town of Dracut and the City of Methuen. The first event took place in Methuen on 09/30/06; the second event happened in Dracut on 04/28/07. For each event, information was distributed to the public in advance that listed what items were appropriate to bring. In addition to making flyers available at various municipal locations, these events were publicized in local newspapers and on the Town's website (See Appendix C).	The Town plans to continue their future partnering efforts with the City of Methuen to offer household hazardous waste collection days in the Fall and Spring each year.

2. Public Involvement and Participation (Cont'd)

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 4 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 5
2-3	Stencil catch basins with "don't dump" message	DPW	Stencil catch basins during years 2 through 5.	The Town continued their catch basin stenciling program by stenciling the words "Don't Dump – Drains to Pond/Lake" next to 60 catch basins tributary to local ponds and lakes.	The annual practice of catch basin stenciling will continue.

3. Illicit Discharge Detection and Elimination

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 4 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 5
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.	This BMP was completed in Year 1.	This BMP was completed in Year 1.
3-2	Enforce existing storm sewer bylaw	DPW and Board of Heath	Bylaw maintained and enforced throughout permit term.	This bylaw has been maintained and enforced through Year 4. No illegal discharges were discovered during this period. The Board of Health received and investigated 4 complaints reported as illegal discharges. Each complaint was investigated; none were determined to be illegal discharges (See Appendix D).	This bylaw will continue to be maintained and enforced.

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 4 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 5
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.	Stormwater outfall inspection summary by year: ■ Year 1: 118 outfalls inspected. ■ Year 2: 160 outfalls inspected. ■ Year 3: 149 outfalls inspected.	This BMP was completed in 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 was conducted at 58 stormwater outfalls where flow was observed. Of the 58 sampled outfalls, 37 locations exhibited signs that illicit connections may be tributary to these outfalls. There were 23 outfalls that showed >1,000 organisms/100 ml, and were designated as high priority. The remaining 14 outfalls showed from 200 to 1,000 organisms/100 ml, and were designated as low priority.	With the dry weather sampling completed, a program will be developed and implemented by the Town to investigate, locate, and eliminate any illicit discharges tributary to these outfalls. The Town will begin by delineating the catchment areas tributary to the 37 outfalls of concern. From there, an estimate will be made to determine the resources needed to investigate each catchment area.
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.	This bylaw has been maintained and enforced through Year 4.	This bylaw will continue to be maintained and enforced.

4. Construction Site Stormwater Runoff Control

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 4 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 5
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.	A building checklist had been developed previously 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. Construction Site Stormwater Runoff Control (Cont'd)

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 4 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 5
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	Town Planner, Conservation Agent, DPW Director	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 were reviewed and approved by Town Counsel. When the regulations were brought before the Conservation Commission, the commission rejected the regulations on the grounds that they exceeded their jurisdiction. In Year 4, the Erosion and Sediment Control Plan issue was again brought before the Conservation Commission at their 02/07/07 meeting. As stated in the Planned Activities for Year 4, the approach presented to the Conservation Commission called for limiting implementation to within their jurisdiction. A memo documenting the meeting has been included (See Appendix E).	The Town has begun exploring the creation of a separate stormwater utility that would, among other things, ultimately be responsible for implementing and enforcing the Erosion and Sediment Control Plan and associated regulations on a Town-wide basis. In Year 5, the Town will be evaluating their current budget in an effort to identify the necessary money to fund a feasibility study for the creation of a separate stormwater utility. The Town will also be exploring grant opportunities to fund this study. In addition, the Planning Board will be approached during this period to discuss an Erosion and Sediment Control Plan and associated regulations. While it is unclear what the Planning Board's response will be, their feedback will be important to any feasibility study efforts.
	Revised		Develop regulation in year 2 to be adopted under the Planning Board in year 3.	Superseded (see narrative above).	Superseded (see narrative above).

4. Construction Site Stormwater Runoff Control (Cont'd)

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 4 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 5
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 5. If the Town is ultimately successful in creating a separate stormwater utility, a public commenting function could be added to the permitting process.
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 using the Town's Sediment Control Checklist (See Appendix F). Site inspections continued again through Year 4. Inspection procedures were updated again during this period, and the changes were implemented.	Site inspections will continue to be performed, and the procedures for same will be updated and implemented in Year 5, as necessary. If the Town is ultimately successful in creating a separate stormwater utility, this entity would be responsible for site inspections as part of the implementation and enforcement of the Erosion and Sediment Control Plan and associated regulations.

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 4 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 5
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.	Conservation Commission will continue this practice in Year 5.

5. Post-Construction Stormwater Management in New Development and Redevelopment (Cont'd)

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 4 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 5
	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".	This BMP was completed in Year 1.
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 59 town-owned BMPs in Year 4 and performed any necessary routine maintenance. Commercial landowners with privately-owned BMPs are required to post bonds to ensure the perpetual maintenance of these BMPs. They are also required to submit annual reports on the condition and maintenance of their BMPs. Nine reports were filed during the previous period.	DPW will continue this practice in Year 5.
	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.	BMP inventory will be maintained. Improvements to structural BMPs, identified during annual inspections, will be prioritized. DPW would then begin the process of implementing these improvements through their operating budget and capital plan.

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 4 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 5
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. The Town has prepared a fact sheet entitled, "What are Wetlands?" (See Appendix G). This fact sheet has been posted to the Town's website.	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.	Annual catch basin cleaning program conducted from March to April 2006. A total of 3,400 catch basins were cleaned during this period. The annual effort removed over 2,000 tons of sand and debris. DPW retrofitted 7 existing catch basins with drainage hoods designed to retain floatable materials for removal during maintenance, and prevent them from being discharged to waterbodies during surges in flow through the catch basin.	The Town will continue program in Spring 2007.
6-3	Continue Annual Street Sweeping Program	DPW	Sweep streets in town annually each spring .	Annual street sweeping program conducted from April to July 2006. Street sweeping was performed on 606 Town streets with a combined length of roughly 332 lane-miles. The annual effort removed over 2,000 tons of sand and debris.	The Town will continue program in Spring/Summer 2007.
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 is planning to build a new salt storage shed in 2008.

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 4 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 5
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 implemented a general training for all public works employees focusing on all BMPs of the SWMP.	The Town will continue to train all public works employees on the various 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 in Year 1 and was updated in Years 2 & 3.	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.
6-8	Conduct DPW Site Assessment	DPW		Funds were secured in Year 2 to conduct an environmental site assessment of DPW yard to evaluate stormwater run-off and storage and control of materials. The DPW is currently working with an engineering firm on a site assessment for stormwater management and compliance at the DPW yard.	DPW is working diligently to complete site assessment. The findings of this site assessment will be summarized in a report from the engineering firm. DPW will review the recommendations from the report and begin the process of implementing them through their operating budget and capital plan.
6-9	Attend Storm Water Management Training	Planning, Engineering		Town Planner and Town Engineer attended EPA Storm Water Management training on 04/08/05. Town Engineer attended independently-certified, privately-sponsored training on 12/08/05 entitled, "Stormwater Management & Financing Seminar"	This BMP was completed in Year 3.

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. Last sampling conducted from March 2004 to November 2004. With the Town's release from the Modified Final Judgment, the sampling requirements identified above were replaced with the outfall inspection program described 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.