05-01-01

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

EPA NPDES Permit Number: **MA041199**

MaDEP Transmittal Number: W-035827

Annual Report Number & Reporting Period: **No. 4: April 06-March 07**

NPDES PII Small MS4 General Permit Annual Report

Part I. General Information

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

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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: E A Kilcoyne

Printed Name: Ms. Elizabeth Kilcoyne

Title: Chairperson, Board of Selectmen

Date: April 30, 2007

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 I. D. 4 - As presented in previous reports, the Town of Ipswich is familiar with the state's Draft TMDL for pathogens/bacteria in the Ipswich River. The Town will consider measures to address bacteria as a pollutant of concern in subsequent permit periods. In the interim, the Town is exploring structural and non-structural BMPs for implementation in the Farley Brook sub-basin, which drains downtown Ipswich, discharges to the Ipswich River, and has been demonstrated to contribute pollutants to the river. In particular, the Town will focus on source reduction measures in tandem with other BMP's, as recommended in the Draft TMDL Report. The investigation was initiated in the Year 4 period and will be completed during Year 5.

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	Procurement/Development of educational material	DPW Director	Procure or adapt four brochures for distribution and posting in subsequent permit years.	Links to public websites have been provided to the Town for uploading to existing stormwater page associated with Conservation Commission site.	Distribution to targeted audiences – for year 5. Public meetings and press releases are planned to inform residents of the Farley Brook stormwater project and anticipated benefits of the project.
Revised			Will post through existing stormwater page with link through Cons. Commission		
				The Town continued several additional educational programs. The Town publishes an Annual Recycling Calendar. In the calendar, information is provided regarding household hazardous waste days and other general information regarding appropriate management of household wastes. The Ipswich Recycling 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, recycling and stormwater.	Continue to provide public information on environmental issues that impact water quality.

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 revised				The Town has become a member of the Greenscape North Shore Coalition, a regional education and outreach initiative to teach citizens how to maintain their lawns and landscapes while protecting water quality of rivers and other local waterbodies.	The Town will participate in the Greenscapes program, part of which includes: • Distribution of a reference guide • Citizen workshops • Email newsletter • Access to Greenscapes website • Targeted outreach • Tabletop display • Demonstration site tours • Rain barrel discounts • Media relations support

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	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 one joint collection day, and one DPW collection day in the Permit year.	Household hazardous waste collection days will continue to be scheduled annually in the Spring and Fall.

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 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.	Outfall mapping for entire community has been completed. In addition to mapping outfalls, condition assessments were performed on all accessible outfalls, and the information has been integrated into the Town's asset management database. The database is available to all Town departments through implementation of a web-based asset management system.	Personnel from various Town Departments, including Utilities, DPW, Planning, Assessors (and others to be identified by the Town) will be trained in the use of the mapping and database tools. Training is expected to take place in late Spring/Summer 2007.

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
3-2	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 has been completed, and condition assessments of outfalls included preliminary assessments (although no sampling) regarding potential illicit discharges was also part of the program. During the drainage infrastructure construction in the Green Street Area, the old drain system was replaced in its entirety and any existing illicit connections were eliminated. Detailed mapping of the Farley Brook sub-basin drainage infrastructure has been completed. This sub-basin is one of the Town's priority planning areas, since it drains much of the urbanize area of downtown Ipswich. Historical sampling indicates the area contributes contaminants of concern to the Ipswich River. The area is the subject of an ongoing investigation including wet weather and dry weather sampling to identify potential contaminants of concern and potential illicit discharges.	Additional priority sub-basins will be identified for infrastructure mapping and condition assessment, including determination of illicit connections or discharges. This is a continuous program expected to be completed over a 2 -3 year period. The Scott Hill/Topsfield Road area has been identified as the next area of investigation within the Town.

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
3-4 Revised	Develop Bylaw Prohibiting Illegal Dumping of Non-SW into MS4	DPW Director	Develop Draft By-law.	The Town has created a Stormwater Committee, chaired by the Chairman of the Conservation Commission, which has been given the mission to evaluate needs and develop a by-law prohibiting non-stormwater discharges in conformance with the regulation and which also meets the needs of the community. The committee has been meeting for approximately 18 months. A draft by-law has been developed. The committee expects that the draft by-law will be presented at Fall 2007 Town Meeting.	Committee timeline is to finalize proposed by-law and submit to Town Meeting for approval within the next reporting period. The prohibition of non-stormwater discharges by-law will be developed as a discrete by-law to be enforced by the DPW.
3-5 Revised	Develop Regulations and Policies to Enforce By-law	DPW Director	Policies and Regulations	The Stormwater Committee is committed to developing the by-law and its implementing rules and regulations as a complete package. The rules and regulations are being developed, therefore, in parallel with the by-law.	The Town anticipates by-law and implementing rules and regulations to be presented at Fall 2007 Town Meeting.

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 Revised	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. PB intends to draft by-law that will address projects of < 1 acre as well.	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. This information has been shared with the Stormwater Committee for consideration of draft by-laws. The Town is additionally working with IRWA which has been provided a grant through the Massachusetts Executive Office of Environmental Affairs to develop model stormwater management by-laws within the Ipswich River Basin. The group expects to have a draft by-law developed within the next reporting period. A major component of the by-law will be a proposed funding mechanism, development of which has been the focus of the grant-funded activity.	The Stormwater Committee will continue to work with Town Officials and the IRWA/consultant team to look at the stormwater management by-law as a comprehensive approach to construction and post-construction phase stormwater management. They anticipate development of the draft by-law within the next reporting period, however, the by-law may not be ready in time for Fall 2007 Town Meeting. If the timeline should extend beyond the permit period, the Town will continue to prepare and present the draft by-law until such time as a compliant by-law is passed.
4-2 Revised	Improve Site Plan Review Process	DPW Director	Draft revised process and tracking tool.	Continue to implement the process developed in Year 3 and improve upon as experience provides opportunities.	Continue to implement process and evaluate effectiveness of the system.

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	Procedures for Receipt of Public Information	Planning Director	Review existing procedures for consideration of improvements or compliance with Phase II.	Existing procedures under review. The Town envisions using the resources of the recently installed asset management software system as a means to receive, document, and respond to public comments.	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 5.
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 4 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 5
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.	See BMP 3-4 above.	The Stormwater Committee will develop a 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.	The DPW intends to incorporate an inventory of publicly owned BMPs as part of the asset management program. The intent is to establish a more uniform maintenance schedule and allow for longer term evaluation of BMP effectiveness and cost impacts to community. The town currently employs a contractor to perform annual catch basin cleaning, and they provide a maintenance log to the Town.	Plan to finalize procedure and implement process. The current catch basin cleaning program will be modified once the Town creates a database to track conditions, volumes and effectiveness of annual "once a year" program town-wide. The objective is to provide more frequent clean-out where required, and less frequent clean-outs where sediment volume or conditions do not warrant it.
Revised					
5-2.2	Establish Funding Mechanism for O&M of structural BMPs.	DPW Director	Investigation of potential funding mechanisms.	See BMP 3-4 and BMP 4-1 above. The funding mechanism for all stormwater related activities will be integral to the new by-laws developed in compliance with NPDES requirements.	Expectation is that a determination regarding potential for a stormwater utility or enterprise fund in Ipswich will be determined within this permit reporting period.
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 4 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 5
6-1	Educate Municipal Employees	DPW Director	Annual Storm Water Training Sessions	The Town sent two Highway Department personnel to an Essex County Highway Association seminar this year. The topic was stormwater management.	An in-house training program will be completed and implemented to augment the training sessions offered through non-municipal partners.
Revised					
6-2	Develop and Implement Municipal Operations Stormwater Plan	DPW Director	Develop and Adopt the plan by the end of Permit Year 2.	Asset management software has been purchased and is now in use. Database is being developed to assist Director with operational schedules and costs. No formal plan has yet been developed.	The Town will continue to map drainage infrastructure, perform condition assessments, and revise operating plans in accordance with findings. The operations stormwater plan will be a dynamic document that is continually updated.

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 4 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 5
	Not Applicable – No TMDL's have been approved for any Waters within the Town of Ipswich.				
Revised	*A Draft Report for bacteria/pathogen TMDLs in the Ipswich River Basin has recently been submitted for review and comment to USEPA. Implications of the TMDL will be addressed in the next 5-year permit program.*			The Town will work with regulators and watershed stakeholders to develop appropriate goals for the next five year permit term.	