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

EPA NPDES Permit Number: MA041186

MassDEP Transmittal Number: **W- 035255**

Annual Report Number & Reporting Period: **April 1, 2007 – March 31, 2008**

NPDES PII Small MS4 General Permit Annual Report (Due: May 1, 2008)

Part I. General Information

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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: Christopher J. McGown

Title: Superintendent of Public Works

Date: April 30, 2008

Part II. Self-Assessment

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

All required provisions of the permit have been met.

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MINIMUM CONTROL BEST MANAGEMENT PRACTICES

1A Hazardous Waste Collection Day

The Town will hold a community Hazardous Waste Collection Day on a bi-annual basis during the summer of Years 1, 3, and 5. The event will be advertised in the local newspaper, and will be held at the Town Department of Public Works (DPW) yard on Woodlawn Street. The DPW and the Recycling Committee will share responsibility for this BMP.

Yearly Report Comment

The Town of Clinton is participating in the North Central Region Hazardous Waste Recycling day. Collection day is May 3, 2008 at Ft. Devens. Items to be collected include paint, solvents, fertilizers, fuel, tars, sealers, cleaners, batteries, cell phones, thermometers, fluorescent lamps, batteries etc.

Waste oil is collected daily at the Town's DPW Facility. Tires and car batteries were collected on recycling day in May. We are planning another hazardous waste collection day for the summer of 2007.

1B Household Recycling Day

The Town will hold a Household Recycling Day at the DPW yard annually during Years 1 through 5. This event, which will be held during the spring of each year, allows residents to dispose of items that are not picked up under the Town Curbside Trash Removal Program (See BMP 6H). Residents are required to pay a fee for each item dropped off, which assists in the funding of this program. Materials accepted under this program include, but are not limited to:

- Tires, propane tanks
- Mattresses, Furniture
- Electronic equipment (televisions, VCRs, etc)
- White Goods (refrigerators, stoves, washing machines, other appliances).

Yearly Report Comment

The Town of Clinton held a Household Recycling Day on April 26th. Recycle day was advertised in the local newspaper, the Town Hall and at the DPW facility. The DPW and the Recycling Committee completed this BMP. The Worcester County Sheriff's

Office supplied the town with five people who were required to complete community service to assist with handling the recyclables. This event will be repeated yearly.

The following items were collected:

Passenger Vehicle Tires, Truck Tires, Car Batteries, Gas Grill Cylinders, Refrigerators, Air Conditioners, Appliances, Computers, Televisions, VCRs, Furniture, Mattresses and Box Springs.

The yearly collection day has been very successful and well attended.

1C Yard Waste Collection Days

The Town will sponsor a series of Yard Waste Collection Days that will allow residents to drop off leaves and other yard waste at the DPW facility each Saturdays in the month of November. This event, which will be held in Years 1 through 5 of the Stormwater Management Program (SMP), will be advertised in the local newspaper as well as at the DPW facility and at Town Hall. The DPW brings the collected materials to a composting center outside of Town where the materials are composted to create loam. Both the DPW and the Recycling committee are responsible for this program.

Yearly Report Comment

Yard Waste Collection days were scheduled every Saturday in November. The yard waste collection days were advertised in the local newspaper and at the DPW. This program is very successful and will continue each year.

1D Community Website

A Community Website will be created during Year 1 of this SMP. The Town will post stormwater related information on this website including a link to DEP's website in Year 2. The website will be updated with new information annually and on an as needed basis during Years 3 through 5 of this program. The DPW and the Board of Selectmen will be responsible for the implementation of this BMP.

Yearly Report Comment

The DPW website has been launched. Clintondpw.com is being populated with information. A link to the DEP's website is included on the Town's website. Copies of the newly enacted stormwater by-laws are available on the website.

1E Classroom Education

Stormwater educational topics will be included in the school science curriculum as a part of this SMP. This information will be included on an annual basis in Years 1 through 5 of this program. At minimum, the curriculum will include one presentation given to the students about stormwater related topics. The School Science Department will be responsible for the implementation of this BMP, with assistance from the DPW.

Yearly Report Comment

The Town of Clinton School Department has implemented a program with the Nashua River Watershed Association where members of the association conduct educational programs for the middle and high school students. Classroom topics include watershed protection and pollution prevention, stormwater management and protection and chemical analysis of water. The students also take a field trip to Coachlace Pond to conduct water quality testing. The 5th grade students take an annual trip to the Nashua River in Groton to learn about pond life and the effects of pollution on different species of pond creatures. The field trip includes a canoe trip on the river.

Students at the Clinton High School regularly take nature hikes along the North Dyke of the Wachusett Reservoir. Conservation and Watershed protection measures are discussed during the hikes.

Sixth grade students attend Natures Classroom for a week each fall in Connecticut. Natures Classroom is a weeklong, hands on, study of nature and the effects that pollution has on our watersheds and the environment.

The DPW Superintendent participated in the annual community reading day at the Clinton Elementary School. The book that was read was about the effects of pollution on the environment. Discussion about how to protect the environment followed the book reading.

1F Local Cable Access

The Town will post stormwater related bulletins on the Local Cable Access channel during the summer of Years 1 through 5 of this program. At least one informational bulletin will be posted annually, with a run time of at least one month. It will be the responsibility of the DPW to ensure that this BMP be implemented each year.

Yearly Report Comment

The DPW has met with the DCR to coordinate placing "After the Storm" on the local cable access channel. "After the Storm" is a cable ready educational video that teaches residents about stormwater pollution and its effect on the environment. The local cable access channel has run "After the Storm" several times during the spring of 2007.

1G Educational Displays

The Town will post at least one educational display per year at the Community Bulletin Board, which is located in Town Hall. Display postings will contain information on stormwater related issues and may be obtained from an applicable governmental or other public agency, or purchased from a distributor. The DPW will be responsible for the implementation of this BMP. Information will be posted during the summer of Years 1 through 5 of this SMP.

Yearly Report Comment

Surface and Ground Water Pollution Prevention Measures were posted on the Town Hall bulletin board. The postings will be updated with new information. And will be posted each year.

The planning/conservation committee's are displaying a poster entitled "Stormwater and the Construction Industry" in their conference room.

MINIMUM CONTROL BEST MANAGEMENT PRACTICES

2A Storm Drain Stenciling

The DPW will review and enhance the Storm Drain Stenciling Program that was initiated in 2002 by the local Boy Scouts. The review will be completed in the Fall of Year 1. During this review, the DPW and the Boy Scouts will develop a list of target catch basins. The selection of targeted priority storm drain locations will be based on the delineation of the urbanized area and DPW knowledge of contamination found during the Catch Basin Cleaning Program (BMP # 6A) and the Dry Season Inspection Program (BMP # 3C). Additionally, a stenciling schedule will be created, which will be implemented during Years 2 through 5 of the SMP. The Boy Scouts will stencil 25% of the targeted catch basins annually during these four years of the program. Catch basins identified as high priority drains will be stenciled annually. Stenciled messages may include such phrases as "Do Not Dump" or "Drains to Stream". This BMP will fall under the responsibility of the DPW.

Yearly Report Comment

The DPW Superintendent has worked with a local Boy Scout Troop for an Eagle Scout project in each of the past three years. To date, the Scouts have stenciled all of the towns storm drains with "No Dumping". The Boy Scouts also located each storm drain in town using a hand held GPS. This information will aid in tracking problem catch basins.

2B Volunteer Clean Up Days

The DPW will contact local conservation groups to coordinate Town wide volunteer clean up days. The DPW will initiate this BMP annually in the spring of Years 1 through 5 of the SMP. The DPW will supply guidance, and assist in the disposal of the collected materials. Information and solicitations regarding these collection days will be posted in the local newspaper, on the local cable access channel (BMP # 1F) and on the community web site (BMP # 1D) beginning in Year 2. The DPW will be responsible for the implementation of this BMP.

Yearly Report Comment

The South Meadow Pond Wildlife Association holds an annual Clean-up Day. Local Boy Scouts held their annual cleanup day in April. The Cub Scouts also held a cleanup day. The DPW utilized the Worcester County Sheriff's Department Community Service Program to clean the streets and other heavy dumping areas. Five inmates cleaned up hundreds of bags of trash during a one week period in October of 2007 and in April of

2008. The DPW assisted in the disposal of the items collected from these events. These events will continue next year.

2C Watershed and Wildlife Organization Meeting

The DPW will annually contact Town Watershed and Wildlife Organizations in an effort to facilitate a meeting to discuss stormwater related topics. During the summer of Years 1 through 5, the DPW will contact these organizations and provide guidance and information to assist in the meeting. Any programs that may be developed from these meetings will be added to the Town SMP, and will fall under the responsibility of the DPW.

Yearly Report Comment

The DPW and the South Meadow Pond Wildlife Association have discussed Watershed protection measures. The DPW, the Town Administrator, the DEP and the South Meadow Pond Wildlife Association have worked together to fund and hire a consultant to study discoloration of the water entering South Meadow Pond adjacent to the landfill. A Comprehensive Site Assessment has been prepared by the consulting engineer and was submitted to the DEP for review. The Town has completed a corrective action alternative analysis which is currently being reviewed by the DEP. Once an alternative is selected, design of the corrective action will be commenced.

2D Adopt-a-Stream

The Town will initiate an Adopt-a-Stream program beginning in the summer of Year 1 of this SMP. It will be the responsibility of the DPW to work with the Wachusett Chamber of Commerce to solicit local businesses or groups to volunteer their time and effort to clean up the Town's streams and other receiving waters. The DPW will supply signs identifying the organization or group that has adopted the stream. Furthermore, the DPW will assume the responsibility for the disposal of the collected materials. This BMP will continue during Years 2 through 5 of the SMP.

Yearly Report Comment

The Nashua River Watershed Association organized a Nashua River Clean up Day. The South Meadow Pond Wildlife Association cleans the area around South Meadow Pond and South Meadow Brook annually. The DPW Superintendent has launched an adopt a stream program over the winter. To date four local businesses have been recruited to clean section of streams throughout the town. We are working to get more businesses signed up. We plan on completing the first cleanup this summer once the stream levels recede.

MINIMUM CONTROL BEST MANAGEMENT PRACTICES

3A Mapping Stormwater Outfalls

A Stormwater Outfall Map will be developed showing all municipal stormwater outfall pipes greater than 12-inches diameter. In Year 1, existing information and reports from previous investigations will be compiled, and field inspections will be conducted of the Towns outfalls. Approximately 25% of the outfalls will be verified and mapped each year for Years 2 through 5. Inspectors will catalogue the size, pipe material and condition of each, the receiving water-body, and visual observation of the discharge and immediate downstream channel. The DPW will be responsible for this BMP.

Yearly Report Comment

All of the outfalls have been located, inspected and mapped. The DPW has worked with a local engineering company and the Boy Scouts to locate, photograph and map each outfall. The outfall map will soon be placed on the new DPW website.

The DCR has mapped stormwater conveyance structures in the Wachusett Reservoir Watershed area. The DCR will pass on this information to the Town.

3B Non-Stormwater Ordinance

The Town intends to adopt an ordinance or other regulatory mechanism to prohibit non-stormwater discharges into the system. The Town will evaluate existing regulations in Year 1, prepare a draft ordinance in Year 2, and propose the new ordinance for adoption by Town Meeting in Year 3. Pending adoption, the ordinance will be enforced in Years 4 and 5. The DPW and the Board of Selectman will share responsibility for this BMP.

Yearly Report Comment

An illicit discharge bylaw was voted on and approved at the June 2006 Annual Town Meeting.

3C Dry Season Inspections

The Town will conduct inspections of the outfalls during the summer in an effort to identify any illicit connections to the MS4. The rationale in this program is that during the dry season very little if any water should be found discharging from the Town's outfalls. The Dry Season Inspections will be conducted in conjunction with BMP # 3A

during Year 1. Additionally, 25% of the Town's outfalls will be inspected annually in Years 2 through 5. The DPW will be responsible for the implementation of this BMP.

Yearly Report Comment

All of our outfalls were inspected and photographed during the summer of 2005. Follow-up inspections were conducted on half of the outfalls during the summer of 2006. The DPW inspected the remaining outfalls during the summer of 2007.

3D Develop Illicit Discharge Plan

The Town will develop an Illicit Discharge Plan to include procedures for identifying, locating, removing illicit discharges as well as documenting actions and evaluating impacts. The Town will evaluate existing procedures and prepare a draft plan in Year 1, and propose the plan for adoption in Year 2. Pending adoption, the ordinance will be enforced in Years 2 through 5. The DPW will be responsible for this BMP.

Yearly Report Comment

An illicit discharge bylaw was voted on and approved at the June 2006 Annual Town Meeting.

MINIMUM CONTROL BEST MANAGEMENT PRACTICES

4A Construction Runoff Ordinance

The Town intends to adopt a Construction Site Runoff Ordinance or other regulatory mechanism to require sediment and erosion control at construction projects with over 1 acre in total disturbance. The Town will evaluate existing regulations (including Zoning, Subdivision, and Wetlands regulations) in Year 1, prepare a draft ordinance in Year 2, and propose the new ordinance for adoption in Year 3. Pending adoption, the ordinance will be enforced in Years 3 through 5. The Planning Board and the Conservation Commission shall share responsibility for this BMP.

Yearly Report Comment

A Stormwater Management and Land Disturbance bylaw was voted on and approved at the June 2006 Annual Town Meeting.

4B Plan Review

Under the Construction Site Runoff Ordinance (or other regulatory mechanism), applicants with projects with disturbance over one acre will be required to submit sediment and erosion control plans for Town review and approval. Until a new ordinance is adopted (anticipated in Year 3), the Town will continue to review construction plans in accordance with existing regulations. Pending adoption, plans will be reviewed per the new ordinance in Years 3 through 5. The Planning Board has responsibility for this BMP.

Yearly Report Comment

Plan reviews will be completed in accordance with the newly adopted Stormwater Management and Land Disturbance bylaw

4C Inspection / Reporting

Under the Construction Site Runoff Ordinance (or other regulatory mechanism), projects with disturbance over one acre will be required to have regular inspection of sediment and erosion controls and reporting of construction activities. Until a new ordinance is adopted (anticipated in Year 3), the Town will continue to require inspection and reporting in accordance with existing regulations. Pending adoption, construction inspection and reporting will be enforced in Years 3 through 5. The Building Inspector has the responsibility for this BMP.

Yearly Report Comment

Inspection and reporting will be completed as specified in the newly adopted Stormwater Management and Land Disturbance bylaw

.4D Building Permit Application

Upon adoption of the Construction Site Runoff Ordinance (or other regulatory mechanism), a question will be added to the Building Permit Application that will trigger the notice to applicants of the new EPA Phase II Stormwater Program requirements for construction activities greater than 1 acre in Year 1. Applicants for projects over 1 acre in total disturbance will be required to confirm that they have obtained an EPA permit number. The Building Inspector has responsibility for this BMP.

Yearly Report Comment

Building permit applicants are required to comply with the newly adopted runoff ordinance. This requirement applies to applicants disturbing more than one acre of land.

SECTION 5 POST CONSTRUCTION STORMWATER MANAGEMENTTighe&B

MINIMUM CONTROL BEST MANAGEMENT PRACTICES

5A Post Construction Runoff Ordinance

The Town intends to adopt an ordinance or other regulatory mechanism to address post construction runoff from projects with over 1 acre in total disturbance. The Town will evaluate existing regulations (including Zoning, Subdivision, and Wetlands regulations) in Year 1, prepare a draft ordinance in Year 2, and propose the new ordinance for adoption in Year 3. Pending adoption, the ordinance will be enforced in Years 3 through 5. The Planning Board has responsibility for this BMP.

Yearly Report Comment

A Post-Construction Stormwater Management bylaw was voted on and approved at the June 2006 Annual Town Meeting.

5B Construction Site Plan Review

Under the Post Construction Runoff Ordinance (or other regulatory mechanism), applicants with projects with disturbance over one acre will be required to submit stormwater control plans for Town review and approval. Until a new ordinance is adopted (anticipated in Year 3), the Town will continue to review new development and redevelopment plans in accordance with existing regulations. Pending adoption, plans will be reviewed per the new ordinance in Years 3 through 5. The Planning Board has responsibility for this BMP. The Planning Board has responsibility for this BMP.

Yearly Report Comment

Stormwater Management and Land Disturbance bylaws has been adopted. Inspection and reporting are completed as specified in the new bylaw.

5C Stormwater System Maintenance Plan

Under the Post Construction Runoff Ordinance (or other regulatory mechanism), projects with disturbance over one acre will be required to include a program outlining enhanced procedures for long term operation and maintenance of stormwater facilities. Until a new ordinance is adopted (anticipated in Year 3), the Town will continue to require stormwater facility operation and maintenance in accordance with existing regulations. Pending adoption, additional operation and maintenance requirements for stormwater facilities constructed as part of new development and redevelopment projects will be enforced in Years 3 through 5. The Board of Selectmen has responsibility for this BMP.

Yearly Report Comment

A Post-Construction Stormwater Management bylaw has been adopted. Operation and Maintenance of stormwater facilities performed as required under the new bylaw.

SECTION 6 GOOD HOUSEKEEPING / POLLUTION PREVENTIONTighe&Bor

MINIMUM CONTROL BEST MANAGEMENT PRACTICES

6A Catch Basin Cleaning Program

The Town will continue the implementation of the current Catch Basin Cleaning Program during Years 1 through 5 of the SMP. Under this program, all of the Town's approximate 1400 catch basins will be cleaned annually at least once. Those catch basins found to have excessive sediment will be cleaned on multiple occasions. The program starts in spring, and is completed by the fall. The DPW will have responsibility of this program.

Yearly Report Comment

The catch basin cleaning program is on going except in the winter season. The town bought a used Vactor truck from the City of Lowell. The truck has been used in conjunction with our catch basin cleaner to clean drain lines and structures. The DPW has greatly reduced its sand use in the winter months. All of the Town's catch basins are inspected and, if needed, cleaned every year.

6B Street Sweeping Program

The Town will sweep all of its streets at least once annually during Years 1 through 5 of the SMP. Under this program, secondary streets will be cleaned once, and major streets will be cleaned on multiple occasions. This program will initiate in the spring, and will be concluded by the fall. It will be the responsibility of the DPW to ensure this BMP is completed.

Yearly Report Comment

The street sweeping program is on going except in the winter season. The DPW has greatly reduced our sand use this past winter. The streets and catch basins have far less sand to be cleaned than in previous years. We anticipate completing the street sweeping by early summer 2008.

6C Used Oil Collection

The Town will continue to collect used oil from its residents for the purpose of recycling. Residents may drop off used oil at the DPW yard on Monday through Friday from 7:30 a.m. to 4:00 p.m. There are no fees or limits associated with this program. Residents are required to label all containers with their name, address, and telephone number, and fill out an inventory log that is maintained by the DPW. This

program will be offered during Years 1 through 5 of the program, and will be under the responsibility of the DPW.

Yearly Report Comment

The used oil collection program is on going year round. The DPW has a waste oil burner at our facility on Woodlawn St. All waste oil collected is used to heat the DPW garage.

6D Vehicle Washing Program

The Town will implement a Vehicle Washing Program for the cleaning of Municipal vehicles in Year 1 of this SMP. During Year 1, a vehicle washing collection system will be installed at the DPW facility on Woodlawn Street. The system will be maintained and if necessary, improved, during Years 2 through 5. The DPW will be the responsible party for this BMP.

Yearly Report Comment

In 2006, several catch basins inside the Department of Public Works building were sealed to provide containment for truck washing water. Pressure washers are used to minimize the amount of water used. Water from the truck washing in general is allowed to evaporate so that disposal is not required.

6E Illegal Dumping

In an effort to reduce illegal dumping of waste materials, the Town will post signage at common dumping areas indicating the dumping of waste is illegal and prohibited. The DPW will clean up and dispose of illegally dumped waste materials as they are identified. The DPW will be responsible for the implementation of this program, which will run during Years 1 through 5 of the SMP.

Yearly Report Comment

Signs have been posted at places were dumping has taken place. The DPW has removed furniture, tires, appliances, and other rubbish as soon as it is reported or noticed. Timely removal of the dumped waste helps in reducing "copycat offenders".

6F Dumpster Recycling Program

The Town will continue to offer the Dumpster Recycling Program to its residents in an effort to reduce pollution and promote recycling. Under this program, residents may bring paper, glass, and metal containers to the DPW yard and deposit them in a series of material specific dumpsters. Once full, the materials are shipped off-site for recycling. Residents may participate in this program throughout the year during Years 1 through 5 of this SMP. The Recycling Committee is responsible for this item.

Yearly Report Comment

The recycling program continued this year. Glass, plastic, paper products, cardboard and cans were collected on site at the Recycling Center. Approximately 250 tons of recycled items were collected as well as approximately 150 cubic yards of plastic. Vendors pick up the dumpsters of separated recyclable products and drop off empty containers to be filled.

6G Curbside Trash Removal Program

The Town offers the curbside removal of solid waste to its residents. It is estimated that 3,000 tons of waste is removed annually from the Town through this program. Residents are required to purchase stickers from the Town and affix them to the trash bags. The Town will pick up the materials and dispose of them properly. This program shall continue during all five years (Years 1 - 5) of the SMP, and will be under the responsibility of the DPW.

Yearly Report Comment

The curbside trash pick-up program continued this past year. Approximately 2600 tons of trash was removed from the town. The trash was picked-up with our rubbish compactor and delivered to Waste Management in Fitchburg MA. The DPW also picks up trash at the schools, the fire department, the police department, the Parks and Recreation Department, and empties the trash barrels in the downtown commercial district.

MINIMUM CONTROL BEST MANAGEMENT PRACTICES

7A TMDL for Receiving Water Nashua River

According to the Massachusetts Year 2002 Integrated List of Waters, Nashua River is designated as Category 5 "Waters requiring a TMDL". The targeted pollutants are pathogens, unknown toxicity, and questionable deposits. Sources of these pollutants include but are not limited to: pet waste, winter road maintenance materials, illicit sewer discharges, failing septic systems, zinc from galvanized gutters/rails, bird guano, illicit discharges of cooling water or industrial wastes, etc. The Stormwater Management Plan includes several BMPs to address reduction of contaminants from these sources under all Six Minimum Control categories. For example, illicit discharges will be addressed under the BMP 3. Housekeeping issues will be addressed under BMP 6. The City will implement these BMPs under the responsible department and timeframes as previously described.

Yearly Report Comment

The efforts for protecting the Nashua River watershed are being addressed in several of the previous BMPs. For example, BMP 3 addresses illicit discharges and BMP 6 deals with house keeping issues. Please review the previous BMPs for more detail.