Municipality/Organization: Grafton

EPA NPDES Permit Number: MAR0041119

MaDEP Transmittal Number: W- 035459

Annual Report Number
& Reporting Period: No. 5: May 2007-May 2008

NPDES PII Small MS4 General Permit Annual Report

Part I. **General Information**

Contact Person: Toma Duhani, P.E. Title: Director of Public Works

Telephone #: (508)839-5335 x124 Email: duhanit@town.grafton.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: Natalie Lashmit

Printed Name: Natalie Lashmit

Title: Town Administrator

Date: April 30, 2008

Part II. Self-Assessment

We have teamed with the Sudbury Assabet Concord Community Council's Water Quality / Water Quantity Sub-committee to provide these services. We were also had a 40-scale flight of our Town done to integrate into our Geographic Information System. This has allowed us to enhance our tracking of outfalls from what we had originally done for this permit.

Mass Highway and the Mass Turnpike Authority have filed a draft permit with EPA. Both of these facilities traverse the Town of Grafton and have a significant impact upon our receiving waters. We are hopeful that we can continue to foster a positive relationship with these entities.

The DPW has continued to expand our street sweeping program. During winter months, when weather permitting we sweep the roads for the second time. We concentrate on industrial/commercial areas first and then move our way outward to roadways with major outfalls to brooks, streams and rivers.

The Conservation Commission has been aggressively pursuing contractors in regards to their stormwater management plans. Our existing town by-law's regarding sedimentation, in conjunction with regular inspections, has virtually made sedimentation issues non-existent.

We are finding that the implementation of a stormwater and illicit discharge/detection by-law is more in-depth and difficult than originally anticipated. This is the most onerous aspect of this first permit.

Part HI. 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 5 (Reliance on non-municipal partners	
1A Revised	Stormwater Lesson Plan for Fifth Graders	SUASCO & DPW	Completed	We were very successful integrating into the 5th grade science curriculum. Continued to use lesson plan.	
1B Revised	Stormwater Flyer for Residents	DPW, Town Clerk	On-Going	New Residents are given stormwater Flyer were distributed to residents as they come in to register to vote	
1C	Newspaper Articles	DPW	On-Going	Continue with current schedule	
1D	Stormwater Flyer for Residents	DPW ConCom	On-Going	New Residents are given Stormwater Flyers as they register to vote	
1D Revised 09/05	Stormwater Flyer for Community Businesses *PowerPoint on stormwater*	DPW/SUASC BVHC DPW/SUASCO	Completed Completed	Continue this program	
1E Revised	*Media* Toolkit	DPW/SUASCO	Completed	Created Media Tool kit for distribution Continue program	

la. Additions

1F	Trees and their use for Stormwater management	DPW, Tree Warden	On-going	As part of Tree City USA inform residents of trees and their benefits for stormwater management	Continue program. Pursue grants to further implement this program. Tree City Award

2. Public Involvement and Participation

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) — Permit Year 5 (Reliance on non-municipal partners indicated, if any)	
2A Revised	Poster Contest for Fifth Graders	SUASCO	Completed	Done in conjunction with stormwater lesson plan	
2B Revised	Annual Stormwater	DPW Conservation and Planning	On-Going	Continue to work with town boards and commissions. In the process of implementing Stormwater By-law	
2C Revised	Watershed Group Involvement	DPW & Local Groups	On-Going	Part of SUASCO Steering Committee, Mass Audubon and Blackstone Headwaters Coalition	
2D Revised 10/05	Stormwater Photo Contest for High School students *Stormwater Summit*	DPW & SUASCO DPW & SUASCO	Changed	Use PowerPoint as main information for summit in Town.	
	Stormwater Stenciling	DPW/SUASCO	On-going	Continue to work with community groups to schedule installation of stencils on catch basins	

2E	Purchase lands for conservation	Town Meeting	On-Going	As land is removed from CH 61A, Town pursues as funding is available	

3. Illicit Discharge Detection and Elimination

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) — Permit Year 5 (Reliance on non-municipal partners indicated, if any)	
3A Revised	Illicit Discharge Bylaw/Regulation	DPW, Planning, Conservation	Develop By-Law	Have contracted with engineering firm to assist in writing bylaws,	
3B Revised	Storm Drain Map	DPW	Find, GPS Survey map outfalls at least 20%.yr.	Additional outfalls are mapped as found	
3C Revised	Illicit Discharge Detection and Elimination	DPW, Planning, Sewer, Bldg., Board of Health 20%/yr	Determine Priority areas. Screen outfalls during dry weather.	Working on illicit discharges In the process of drafting by-law	
3D Revised	Illicit Discharge Education	SUASCO & DPW	Include in flyers	Flyers given to new residents Programs continues	
3E Revised	Education for Municipal Employees	DPW	Included in Measure 6	D.O.T. Training to all employees new employees are trained as they are hired	

3a. Additions

4. Construction Site Stormwater Runoff Control

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) — Permit Year 5 (Reliance on non-municipal partners indicated, if any)	
4A Revised	Construction Site Runoff Bylaw	Conservation & DPW	Develop by-law	Article to be placed on fall Town Meeting for bylaw approval	
4B Revised	BMP's for Construction Site Erosion, Sediment	Conservation & DPW	Prepare regulations	Article to be placed on fall Town Meeting for bylaw approval	
4C Revised	Construction Site Plan Review Procedures	DPW, Conservation, Planning, Board	Prepare regulations	Article to be placed on fall Town Meeting for bylaw approval	
4D Revised	Construction Site Inspection and Enforcement Procedures	DPW, Conservation, Planning, Board of Health	Prepare regulations	Article to be placed on fall Town Meeting for bylaw approval	
4E Revised	Response to Public Hotline	DPW, Conservation, Planning, Board of Health	Advertise and test hotline	Town to respond on an as need basis	

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 5 (Reliance on non-municipal partners indicated, if any)	
5A Revised	Post Construction Site Runoff Bylaw/Regulatory Mechanism	DPW, Planning, Conservation	Develop bylaw, Involve and educate public municipal officials, developers, contractors	Article to be placed on the fall Town meeting for bylaw approval.	
5B Revised	Choose Structural and Non Structural BMP 's	DPW, Planning, Conservation	Included in the regulations	Town preparing regulations that identify BMP's	
5C Revised	Long Term BMP Operation and Maintenance Procedures	DPW	Included in the regulations	Town preparing regulations that identify BMP's	
5D Revised	Structural BMP Implementation Procedures	DPW	Included in the regulations	Town preparing regulations that identify BMP's	

5a. Additions

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 5 (Reliance on non-municipal partners indicated, if any)	
6A Revised	Employee Training to Prevent/Reduce Stormwater Pollution	DPW	Sample/Test Training	On-Going	
6B Revised	Maintenance/Inspection of Storm Sewers and Structural/Non-Structural Controls	DPW	Develop New/Improved Activities, Schedules and Procedures	On-Going Finalized maintenance activities, schedules and long term inspection procedures	
6C Revised	Pollutant Source Reduction/Elimination from Municipal facilities & Activities	DPW	Develop Draft BMPs	Completed Finalize BMPs	
6D Revised	Waste Disposal Procedures from Storm Sewers & Municipal	DPW	Develop Procedures	Finalizing procedures	

7. BMPs for Meeting Total Maximum Dai y Load (TMDL) Waste Load Allocations (WLA) << f *applicable*>>

BMP **ID #**	BMP **Description**	**Responsible Dept./Person Name**	**Measurable Goal(s)**	**Progress on Goal(s) – Permit Year 5 (Reliance on non-municipal partners indicated, if any)**	

7a. Additions

7b.	WLA Assessment				

Part IV. Summary of Information Collected and Analyzed

Part V. Program Outputs & Accomplishments (OPTIONAL)

Programmatic

Stormwater management position created/staffed	(y/n)	No
Annual program budget/expenditures	($)	$15,000 +/-

Education, Involvement, and Training

Estimated number of residents reached by education program(s)	(# or %)	60 %
Stormwater management committee established	(y/n)	No
Stream teams established or supported	(# or y/n)	No
Shoreline clean-up participation or quantity of shoreline miles cleaned	(y/n or mi.)	No
Household Hazardous Waste Collection Days		
■ days sponsored	(#)	1
■ community participation	(%)	7.1
■ material collected	(tons or gal)	2.48 tons
School curricula implemented	(y/n)	Yes

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	(%)	100
Estimated or actual number of outfalls	(#)	300 (E)
System-Wide mapping complete	(%)	100
Mapping method(s)		
■ Paper/Mylar	(%)	
■ CADD	(%)	10 %
■ GIS	(%)	90%
Outfalls inspected/screened	(# or %)	40 %
Illicit discharges identified	(#)	0 %
Illicit connections removed	e n (est. gpd)	
% of population on sewer	(%)	60%
% of population on septic systems	(%)	40%

Construction

Number of construction starts (>1-acre)	(#)	25
Estimated percentage of construction starts adequately regulated for erosion and sediment control	(%)	80%
Site inspections completed	(# or %)	50 +
Tickets/Stop work orders issued	(# or %)	0
Fines collected	(# and $)	$0
Complaints/concerns received from public	(#)	100

Post-Development Stormwater Management

Estimated percentage of development/redevelopment projects adequately regulated for post-construction stormwater control	(%)	40 %
Site inspections completed	(# or %)	10
Estimated volume of stormwater recharged	(gpy)	n/a

Operations and Maintenance

Average frequency of catch basin cleaning (non-commercial/non-arterial streets)	(times/yr)	1/YR
Average frequency of catch basin cleaning (commercial/arterial or other critical streets)	(times/yr)	2/YR
Total number of structures cleaned	(#)	+/- 2500
Storm drain cleaned	(LF or mi.)	
Qty. of screenings/debris removed from storm sewer infrastructure	(lbs. or tons)	2000 TONS
Disposal or use of sweepings (landfill, POTW, compost, recycle for sand, beneficial use, etc.)		Landfill
Cost of screenings disposal	($)	30,000

Average frequency of street sweeping (non-commercial/non-arterial streets)	(times/yr)	2/yr

Average frequency of street sweeping (commercial/arterial or other critical streets)	(times/yr)	2/yr
Qty. of sand/debris collected by sweeping	(lbs. or tons)	2000 tons
Disposal of sweepings (landfill, POTW, compost, beneficial use, etc.)	(location)	Compost, landfill, Reuse
Cost of sweepings disposal	($)	$30/ton
Vacuum street sweepers purchased/leased	(#)	0
Vacuum street sweepers specified in contracts	(y/n)	No

Reduction in application on public land of: ("N/A" = never used; "100%" = elimination)		
■ Fertilizers	(lbs. or %)	50%
■ Herbicides	(lbs. or %)	N/A
■ Pesticides	(lbs. or %)	90%

Anti-/De-Icing products and ratios	% NaC1 % $CaC1_2$ % MgC12 % CMA % Kac % KC1 % Sand	80 20 0 0 0 0 0
Pre-wetting techniques utilized	(y/n)	Y
Manual control spreaders used	(y/n)	Y
Automatic or Zero-velocity spreaders used	(y/n)	N
Estimated net reduction in typical year salt application	(lbs. or %)	
Salt pile(s) covered in storage shed(s)	(y/n)	Y
Storage shed(s) in design or under construction	(y/n)	N

Town of Grafton
Department of Public Works

30 Providence Road
Grafton, Massachusetts 01519
Phone 508-839-5335 x 124 Fax 508-839-4602

Toma Duhani, P.E.
Director of Public Works

Administration
Engineering
Highway
Sanitation
Facilities
Parks & Cemetery

May 1, 2008

Dan Webster
Chief Industrial Permit Branch
USEPA Region 1
1 Congress Street, Suite 1100
Mail Code CIP
Boston, MA 02114-2023

Dear Mr. Webster,

Enclosed please find the Town of Grafton's NPDES Phase II Year Five report.

Please contact me if you have any questions.

Sincerely,

Toma Duhani, P.E.
Director of Public Works