

cc: BAS

2/21/03 (6)



CORPORATE OFFICES: Maine, Massachusetts, New Hampshire, Connecticut, Illinois, Florida Operational offices throughout the U.S.

MEMORANDUM

TO: Board of Selectmen
FROM: Helen Priola, Woodard & Curran
DATE: February 21, 2003
RE: Storm Water NOI Permit Submission

The National Pollution Discharge Elimination System (NPDES) Storm Water Program is a nationwide, two phase program aimed at reducing the impacts of storm water on the nations surface water. Phase II of this program requires storm water permitting of communities with smaller populations than 100,000 and urbanized areas based on the census of 2000. Each of the Phase II communities must submit a form to apply for a town-wide permit of their storm water drainage system. The permit form requires each community to outline a series of Best Management Practices to meet the permit requirements. A major component of the permit requirement is each community's Storm Water Management Plan (SWMP) to be implemented over the first 5 year permit period. The plan is divided into six minimum control measures (MCM) and compliance with total maximum discharge limits for watersheds.

- MCM 1 - Public Education & Outreach: partner w/ local watershed organization, develop public education brochures/press releases, student lesson workshops, develop website information, cable access show
MCM 2 - Public Participation/Involvement: partner w/ local watershed organization, traveling display, poster and photo contest, organize public meetings and panels, organize stenciling program, and town department involvement
MCM 3 - Illicit Discharge Detection and Elimination: storm drain map, implement by-law, perform an illicit discharge detection campaign, correct illicit discharges, educate citizens
MCM 4 - Construction Site Runoff Control: implement bylaw, incorporate sanctions, site plan review rules and regulations, site inspection and enforcement control measures, establish procedures to record and address public inquires or concerns.
MCM 5 - Post-Construction Runoff Control: implement zoning changes if required, develop regulations requiring structural storm water controls, develop and review and implement inspection procedures for private storm water systems
MCM 6 - Pollution Prevention/Good Housekeeping: audit town facilities, memorialize current operation and maintenance plans and update to meet NPDES permit requirements, outline and implement employee training program, review current recycling plan for compliance, implement changes if required and monitor program

I have attached six tables from the Town's Draft SWMP which outline in more detail the actual implementation plan for the next five years.

Woodard & Curran was hired to work with Acton Department Heads who are impacted by the Storm Water permitting process to create a SWMP for implementation over the next five years and prepare the permit submission. The Town of Acton has conducted much already in the area of Storm Water

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Management and we have made sure that you get created for the work that has either been accomplished or is funded and underway. Doing so will reduce the need for new projects and additional expenditures.

We are requesting that the Board of Selectmen review the proposed permit information provided herein for approval. The permit form is due on March 10, 2003.

TABLE 2.1 – SCHEDULE OF IMPLEMENTATION AND MEASURABLE GOALS FOR PUBLIC EDUCATION AND OUTREACH

Best Management Practice/Responsible Dept. Contact	Measurable Goals (Implementation is Subject to Appropriation of funds)				
	Year 1 (Mar 03 – Mar 04)	Year 2 (Mar 04 – Mar 05)	Year 3 (Mar 05 – Mar 06)	Year 4 (Mar 06 – Mar 07)	Year 5 (Mar 07 – Mar 08)
BMP #PE 1 Partner w/ local organization/ <i>Doug Halley – Board of Health (BOH)</i>	Form partnership with 1 org with financial contribution (SuAsCo) Done	Continue partnership	Continue partnership	Continue partnership	Continue partnership
BMP #PE 2 Develop public education brochures/press releases/ <i>Doug Halley BOH</i>	Finalize watershed awareness survey & mail to 319 Grant Program targeted neighborhoods	Storm Water Flyer Distributed to 100% of residents	Distribute Storm Water Flyer to 50% of businesses with storm water logo displayed at businesses Redistribute sample storm water survey to public to determine effectiveness of education program	Generate 4 press releases for media	
BMP #PE 3 Classroom instruction/ <i>Tom Tidman Conservation Commission (ConCom)</i>		Storm Water Lesson Plan Presented to Youth Groups/Summer Programs			
BMP #PE 4 Develop information for existing web page/ <i>Mark Hall Information Technology Group (IT)</i>	-	Develop and post Storm Water Webpage	Maintain and update webpage	Maintain and update webpage	Maintain and update webpage
BMP #PE 5 Develop signs for structural BMPs/ <i>Doug Halley BOH</i>	Kiosk at NARA constructed wetland	Identify 5 BMP locations for signs	Install 5 signs at BMP locations	Check signs for damage or wear & tear	Install 3 additional signs at 3 new BMP sites
BMP #PE 6 Cable Access TV Show/ <i>Mark Hall (IT)</i>	-	-	-	Deliver storm water media packet to cable show	Create storm water video and show at one public meeting and one local cable station event

TABLE 3.1 – SCHEDULE OF IMPLEMENTATION AND MEASURABLE GOALS FOR PUBLIC PARTICIPATION/INVOLVEMENT

Best Management Practice/Responsible Dept. Contact	Measurable Goals (Implementation is Subject to Appropriation of funds)				
	Year 1 (Mar 03 – Mar 04)	Year 1 (Mar 03 – Mar 04)	Year 1 (Mar 03 – Mar 04)	Year 1 (Mar 03 – Mar 04)	Year 1 (Mar 03 – Mar 04)
BMP #PP 1 Partner w/ local organization/ <i>Doug Halley BOH</i>	Continue partnership with SuAsCo	Continue partnership with SuAsCo	Continue partnership with SuAsCo	Continue partnership with SuAsCo	Continue partnership with SuAsCo
BMP #PP 2 Place Traveling Display at various locations/ <i>Doug Halley BOH</i>	Obtain display from SuAsCo, place at four locations throughout the year				
BMP #PP 3 Poster and Photo Contests/ <i>Nancy Mc Shea Recreational Director</i>		Hold a Storm Water Poster Contest for Youth Groups	Hold a Storm Water Photo Contest for Youth Groups		
BMP #PP 4 Organize public meetings and panels/ <i>Doug Halley BOH</i>	Discuss storm water management at 1 public meeting	Discuss storm water management at 1 public meeting	Discuss storm water management at 1 public meeting	Conduct a Storm Water Summit Special Event. Discuss storm water management at 1 public meeting	Participate in SuAsCo Storm Water Super Summit and Conduct an Evaluation and Assessment of Public Awareness of Storm Water Discuss storm water management at 1 public meeting
BMP #PP 5 Organize and Conduct volunteer storm drain stenciling program/ <i>Doug Halley BOH</i>	OAR volunteers stenciled portion of Town 1998 Prioritize areas to be stenciled by levels of impairment	Stencil 25% of the prioritized areas.	Stencil 25% of the prioritized areas.	Stencil 25% of the prioritized areas.	Stencil 25% of the prioritized areas.
BMP #PP 6 Town Departments Involved/ <i>Doug Halley BOH</i>		Involve departments in flier distribution and regulation			Involve departments in flier distribution and regulation

TABLE 4.1 - SCHEDULE OF IMPLEMENTATION AND MEASURABLE GOALS FOR ILLICIT DISCHARGE DETECTION AND ELIMINATION

Best Management Practice/Responsible Dept. Contact	Measurable Goals (Implementation is Subject to Appropriation of funds)				
	Year 1 (Mar 03 – Mar 04)	Year 1 (Mar 03 – Mar 04)	Year 1 (Mar 03 – Mar 04)	Year 1 (Mar 03 – Mar 04)	Year 1 (Mar 03 – Mar 04)
BMP #ID 1 Generate a comprehensive Storm Drain Map for the Town/Doug Halley BOH	Drainage Map with Watershed delineations (completed) Determine Essential Fish Habitation Determine Impacts to Historical Areas	Field Verify drainage map features for 25% streets older than 1960. Update map as new drainage is installed or replaced	Field Verify drainage map features for 25% streets older than 1960. Update map as new drainage is installed or replaced	Field Verify drainage map features for 25% streets older than 1960. Update map as new drainage is installed or replaced	Field Verify drainage map features for 25% streets older than 1960. Update map as new drainage is installed or replaced
BMP #ID 2 Implement a Town By-Law/ Roland Bartl Planning Dept.		Review & Analyze existing bylaws and rules and regulations. Develop bylaw if required with stated penalties governing illicit discharges	Continue to develop bylaw with stated penalties governing illicit discharges	Present Bylaw and Rules and Regulations to Public for comment.	Bring bylaw in front of Town Meeting
BMP #ID 6 Perform an illicit discharge detection campaign/ Doug Halley BOH	Conduct Proposed Acton Watershed Health Monitoring and Management Plan to identify potential problem areas (project scope submitted for Grant with Massachusetts Office of Coastal Zone Management)		Conduct testing in areas identified as potential locations for illicit connections. Dry weather flow observation effort and sampling program.	Pinpoint sources of illicit discharges	-
BMP #ID 7 Correct Illicit Discharges/Doug Halley BOH	-	-		Enforce By-Law to correct detected illicit discharges and Remove 75 % of detected discharges corrected	
Educate Citizens/ Doug Halley BOH	-			Develop and distribute fliers defining illicit discharges and summarizing the Town By-Law	Re-distribute fliers

TABLE 5.1 - SCHEDULE OF IMPLEMENTATION AND MEASURABLE GOALS FOR CONSTRUCTION SITE RUNOFF CONTROL

Best Management Practice/Responsible Dept. Contact	Measurable Goals (Implementation is Subject to Appropriation of funds)				
	Year 1 (Mar 03 – Mar 04)	Year 1 (Mar 03 – Mar 04)	Year 1 (Mar 03 – Mar 04)	Year 1 (Mar 03 – Mar 04)	Year 1 (Mar 03 – Mar 04)
BMP #CR 1 Implement by-law related to construction runoff control/ <i>Roland Bartl Planning Dept.</i>		Begin in-house assessment	Continue to develop and add “Erosion and Sediment Control” by-law to Town By-Laws		-
BMP #CR 2 Incorporate sanctions into By-Law to ensure compliance/ <i>Roland Bartl Planning Dept.</i>	-	-	-		Sanctions developed and included in by-law
BMP #CR 3 Site Plan Review/ <i>Roland Bartl Planning Dept.</i>	-	-	-		All applicable plans reviewed for compliance with by-law
BMP #CR 4 Site inspection and enforcement of control measures/ <i>Roland Bartl Planning Dept.</i>	-	-	-		Standard site inspection Guidelines in place
BMP #CR 5 Establish procedures to record and address public inquiries or concerns / <i>Roland Bartl Planning Dept.</i>	-	-		Procedure in place for handling public comment	-

TABLE 6.1 - SCHEDULE OF IMPLEMENTATION AND MEASURABLE GOALS FOR POST-CONSTRUCTION RUNOFF CONTROL

Best Management Practice/Responsible Dept. Contact	Measurable Goals (Implementation is Subject to Appropriation of funds)				
	Year 1 (Mar 03 – Mar 04)	Year 1 (Mar 03 – Mar 04)	Year 1 (Mar 03 – Mar 04)	Year 1 (Mar 03 – Mar 04)	Year 1 (Mar 03 – Mar 04)
BMP #PCR 1 Evaluate, enhance and implement zoning requirements/ <i>Roland Bartl Planning Dept.</i>		Evaluate current zoning by-laws and determine weaknesses related to surface water preservation		Develop new zoning by-laws focused on surface water preservation	Bring new bylaws to the Town meeting with Construction site runoff control bylaw
BMP #PCR 2 Develop regulations requiring specific structural storm water controls/ <i>Roland Bartl Planning Dept.</i>	-		Identify specific structural controls (BMPs) in Subdivision Rules and Regulations	-	-
BMP #PCR 3 Develop review and inspection procedures for private storm water systems/ <i>Roland Bartl Planning Dept.</i>	-	-		Review condition on maintenance requirements	

**TABLE 7.1 - SCHEDULE OF IMPLEMENTATION AND MEASURABLE GOALS FOR POLLUTION PREVENTION /
GOOD HOUSEKEEPING**

Best Management Practice/Responsible Dept. Contact	Measurable Goals (Implementation is Subject to Appropriation of funds)				
	Year 1 (Mar 03 – Mar 04)	Year 1 (Mar 03 – Mar 04)	Year 1 (Mar 03 – Mar 04)	Year 1 (Mar 03 – Mar 04)	Year 1 (Mar 03 – Mar 04)
BMP #PGH 1 Audit of Town Facilities/David Brown DPW	Department meeting on pollution prevention	Assessment of DPW Yard			-
BMP #PGH 2 Operation and Maintenance Program/David Brown DPW	Completed first round of cleaning outfalls in 2002. Beginning tracking records of catch basins cleaned each year	Revisit 25% of outfalls for maintenance. Monitor sediment removed from catch basins each year	Revisit 25% of outfalls for maintenance Memorialize the current Schedule for catch basin cleaning and street sweeping in writing for annual reporting	Revisit 25% of outfalls for maintenance	Revisit 25% of outfalls for maintenance
BMP #PGH 3 Employee Training Programs/David Brown DPW	Generate list of all prior relevant employee training activities	-	Administer a good housekeeping workshop at DPW	-	-
BMP #PGH4 Recycling Program/David Brown DPW	Review current recycling program	Monitor recycling program and enhance if necessary	-	Monitor recycling program and enhance if necessary	-