

Municipality/Organization: Town of Douglas, MA
EPA NPDES Permit Number: MAR041106
MassDEP Transmittal Number: W-040641
Annual Report Number & Reporting Period: Year 15
April 1, 2017 – March 31, 2018

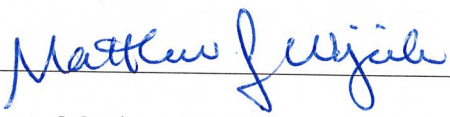
**NPDES PII Small MS4 General Permit
Annual Report
(Due: May 1, 2018)**

Part I. General Information

Contact Person: William J. Cundiff, P.E. **Title:** Town Engineer
Telephone #: 508-476-4000 x208 **Email:** WCundiff@DouglasMA.org
Mailing Address: 29 Depot Street, Douglas, MA 01516

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: Matthew Wojcik
Title: Town Administrator
Date: April 30, 2018

Part II. Self-Assessment

The Town of Douglas has completed the required self-assessment and has determined that our municipality is in compliance with all the permit conditions. This past year, the Town has prepared a new Operation and Maintenance Plan (O&M Plan) for facilities and equipment relating to Stormwater Management. The Town is seeking funding to implement an Illicit Discharge Detection and Elimination (IDDE) sampling program. A proposed stormwater bylaw was put forth at a previous annual town meeting and was overwhelmingly defeated. The local boards are revisiting this topic to make any necessary revisions in order to provide a compliant draft that will pass Town Meeting, if necessary. A review of existing bylaws indicates that the Town may already have adequate protections in place that comply with the NPDES requirements, a more specific and detailed review is underway by the Planning Board and Conservation Commission.

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 8 (Reliance on non-municipal partners indicated, if any)	Planned Activities
2.1 Revised	Lawn & Garden Activities	Comm. Dev. / Wm. Cundiff	Cable Advertisements & Internet	Cable Advertisements have been running.	Developing the internet information and continuing with the Cable Advertisements.
2.2 Revised	Household Hazardous Waste	Comm. Dev. / Wm. Cundiff	Cable Advertisements & Internet	Cable Advertisements have been running.	Developing the internet information and continuing with the Cable Advertisements.
2.3 Revised	Pet Waste Management	Comm. Dev. / Wm. Cundiff	Cable Advertisements & Internet	Cable Advertisements have been running.	Developing the internet information and continuing with the Cable Advertisements.
2.4 Revised	Trash Management	Comm. Dev. / Wm. Cundiff	Cable Advertisements & Internet	Cable Advertisements have been running.	Developing the internet information and continuing with the Cable Advertisements.
2.5 Revised	Classroom Education	School Dept. / Kevin Maines	Number of Classes	Two Classes completed this past year (AP Env. Studies).	Planning and evaluating how to incorporate classroom education.
2.6 Revised	Stormwater Education Materials	Comm. Dev. / Wm. Cundiff	Cable Advertisements & Internet	Cable Advertisements have been running.	Developing the internet information and continuing with the Cable Advertisements.

1a. Additions

2. Public Involvement and Participation

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 8 (Reliance on non-municipal partners indicated, if any)	Planned Activities
3.1	Storm Drain Stenciling	Highway Dept. / John Furno	No. of Storm Drains Stenciled	All catch basins in the vicinity of the downtown area have been stenciled (~150/as needed). Total: 175	Maintain stenciling during catch basin cleaning, as needed.
Revised					
3.2	Stream Cleanup & Monitoring	Conservation Commission / Wm. Cundiff	No. of Cleanup Events	The Conservation Commission held no stream clean-ups this year.	Maintaining a Stream Cleanup and monitoring program.
Revised					
3.3	Adopt-A-Stream program	Conservation Commission / Wm. Cundiff	No. of Streams Adopted	No Streams have been adopted to date.	Implementation of an Adopt-A-Stream program.
Revised					
3.4	Community Hotlines	Highway Dept. / John Furno	No. of Calls Received	No Calls Received this year.	Continue advertisements on cable and internet to let people know what department to call.
Revised					
Revised					
Revised					

2a. Additions

3. Illicit Discharge Detection and Elimination

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 8 (Reliance on non-municipal partners indicated, if any)	Planned Activities
4.1	Failing Septic System	Board of Health / Kristin Harris	No. of Systems repaired	Two (2) systems have failed over this past year. Twelve (12) systems have been repaired.	Continue identifying failed systems and monitoring the progress of the repairs.
Revised					
4.2	Improper Wastewater Connection / Discharge	Community Development / Wm. Cundiff	Surveys Completed	Form is currently being developed for posting on the Town Website.	Complete form development and post form on website.
Revised					
4.3	Sanitary Sewer Overflows	Sewer Dept. / Robert Sullivan	No. of Overflows / repairs	No overflows were identified.	Continue system inspection on an annual basis. I/I evaluation required under State wastewater Permit.
Revised					
Revised					
Revised					
Revised					

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 8 (Reliance on non-municipal partners indicated, if any)	Planned Activities
5.1 Revised	Runoff Control	Comm. Dev. / Wm. Cundiff	Implementation of Requirements	Projects must meet various stormwater management controls and BMPs through existing local bylaw and state regulatory requirements.	Continue to monitor and meet the local bylaw & state regulatory requirements.
5.2 Revised	Erosion Control	Comm. Dev. / Wm. Cundiff	Implementation of Requirements	Projects must meet various stormwater management controls and BMPs through existing local bylaw and state regulatory requirements.	Continue to monitor and meet the local bylaw & state regulatory requirements.
5.3 Revised	Sediment Control	Comm. Dev. / Wm. Cundiff	Implementation of Requirements	Projects must meet various stormwater management controls and BMPs through existing local bylaw and state regulatory requirements.	Continue to monitor and meet the local bylaw & state regulatory requirements.
5.4 Revised	Good Housekeeping	Comm. Dev. / Wm. Cundiff	Implementation of Requirements	Projects must meet various stormwater management controls and BMPs through existing local bylaw and state regulatory requirements.	Continue to monitor and meet the local bylaw & state regulatory requirements.
Revised					
Revised					

4a. Additions

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 8 (Reliance on non-municipal partners indicated, if any)	Planned Activities
6.1	Structural BMPs	Community Development / Wm. Cundiff	Implementation of Requirements	Projects must meet various stormwater management controls and BMPs through existing local bylaw and state regulatory requirements.	Continue to monitor and meet the local bylaw & state regulatory requirements.
Revised					
6.2	Non-Structural BMPs	Community Development / Wm. Cundiff	Implementation of Requirements	Projects must meet various stormwater management controls and BMPs through existing local bylaw and state regulatory requirements.	Continue to monitor and meet the local bylaw & state regulatory requirements.
Revised					
Revised					
Revised					
Revised					
Revised					

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 8 (Reliance on non-municipal partners indicated, if any)	Planned Activities
7.1	Operation & Maintenance	Highway Dept. / John Furno	Implementation of Requirements	Inspected and cleaned catch basins, detention basins, swept streets, and minimized the use of road salt throughout the Town as part of the Towns Annual Maintenance program.	Establish an inventory of the Town-wide stormwater management structures and develop a formal inspection and maintenance plan. Continue implementing requirements as outlined in Section 7 of the original plan.
Revised					
Revised					
Revised					
Revised					
Revised					
Revised					

6a. Additions

7. BMPs for Meeting Total Maximum Daily Load (TMDL) Waste Load Allocations (WLA) <<if applicable>>

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 8 (Reliance on non-municipal partners indicated, if any)	Planned Activities
8.1	Upgrade of WWTP	Sewer Dept. / Robert Sullivan	Completion of Construction	Construction of WWTP upgrade is presently completed.	None
Revised					
Revised					
Revised					
Revised					
Revised					
Revised					

7a. Additions

7b. WLA Assessment

Part IV. Summary of Information Collected and Analyzed

No data has been collected thusfar.

Part V. Program Outputs & Accomplishments (OPTIONAL)

(Since beginning of permit coverage unless specified otherwise by a **, which indicates response is for period covering April 1, 2010 through March 31, 2011)

Programmatic

	(Preferred Units)	Response
Stormwater management position created/staffed	(y/n)	Y
Annual program budget/expenditures **	(\$)	\$40,000
Total program expenditures since beginning of permit coverage [(\$40,000 x 15 years)]	(\$)	\$600,000
Funding mechanism(s) (General Fund, Enterprise, Utility, etc)		Capital Exp. & Operating Budget

Education, Involvement, and Training

Estimated number of property owners reached by education program(s)	(# or %)	60%
Stormwater management committee established	(y/n)	N
Stream teams established or supported	(# or y/n)	Y
Shoreline clean-up participation or quantity of shoreline miles cleaned **	(y/n or mi.)	Y
Shoreline cleaned since beginning of permit coverage	(mi.)	2
Household Hazardous Waste Collection Days		
▪ days sponsored **	(#)	0
▪ community participation **	(# or %)	0
▪ material collected **	(tons or gal)	0
School curricula implemented	(y/n)	Y

Legal/Regulatory

	In Place Prior to Phase II	Reviewing Existing Authorities	Drafted	Draft in Review	Adopted
Regulatory Mechanism Status (indicate with "X")					
▪ Illicit Discharge Detection & Elimination					X
▪ Erosion & Sediment Control	X	X			
▪ Post-Development Stormwater Management	X	X			
Accompanying Regulation Status (indicate with "X")					
▪ Illicit Discharge Detection & Elimination					X
▪ Erosion & Sediment Control	X	X			
▪ Post-Development Stormwater Management	X	X			

Mapping and Illicit Discharges	(Preferred Units)	Response
Outfall mapping complete	(%)	100%
Estimated or actual number of outfalls	(#)	81
System-Wide mapping complete (complete storm sewer infrastructure)	(%)	100%
Mapping method(s)		
▪ Paper/Mylar	(%)	0%
▪ CADD	(%)	0%
▪ GIS	(%)	100%
Outfalls inspected/screened **	(# or %)	0
Outfalls inspected/screened (Since beginning of permit coverage)	(# or %)	0
Illicit discharges identified **	(#)	0
Illicit discharges identified (Since beginning of permit coverage)	(#)	0
Illicit connections removed **	(#); and (est. gpd)	0
Illicit connections removed (Since beginning of permit coverage)	(#); and (est. gpd)	0
% of population on sewer	(%)	20%
% of population on septic systems	(%)	80%

Construction

	(Preferred Units)	Response
Number of construction starts (>1-acre) **	(#)	4
Estimated percentage of construction starts adequately regulated for erosion and sediment control **	(%)	100%
Site inspections completed **	(# or %)	100%
Tickets/Stop work orders issued **	(# or %)	0
Fines collected **	(# and \$)	0
Complaints/concerns received from public **	(#)	0

Post-Development Stormwater Management

Estimated percentage of development/redevelopment projects adequately regulated for post-construction stormwater control	(%)	100%
Site inspections (for proper BMP installation & operation) completed **	(# or %)	0
BMP maintenance required through covenants, escrow, deed restrictions, etc.	(y/n)	N
Low-impact development (LID) practices permitted and encouraged	(y/n)	Y

Operations and Maintenance

Average frequency of catch basin cleaning (non-commercial/non-arterial streets) **	(times/yr)	1
Average frequency of catch basin cleaning (commercial/arterial or other critical streets) **	(times/yr)	1
Qty of structures cleaned **	(#)	736
Qty. of storm drain cleaned **	(%, LF or mi.)	165'
Qty. of screenings/debris removed from storm sewer infrastructure **	(lbs. or tons)	0
Disposal or use of screenings (landfill, POTW, compost, beneficial use, etc.) **	(location)	N/A

Basin Cleaning Costs		
• Annual budget/expenditure (labor & equipment)**	(\$)	\$13,200
• Hourly or per basin contract rate **	(\$/hr or \$ per basin)	N/A
• Disposal cost**	(\$)	N/A
Cleaning Equipment		
• Clam shell truck(s) owned/leased	(#)	1
• Vacuum truck(s) owned/leased	(#)	0
• Vacuum trucks specified in contracts	(y/n)	N/A
• % Structures cleaned with clam shells **	(%)	100%
• % Structures cleaned with vacuor **	(%)	0%

	(Preferred Units)	Response
Average frequency of street sweeping (non-commercial/non-arterial streets) **	(times/yr)	1
Average frequency of street sweeping (commercial/arterial or other critical streets) **	(times/yr)	1
Qty. of sand/debris collected by sweeping **	(lbs. or tons)	151 Tons
Disposal of sweepings (landfill, POTW, compost, beneficial use, etc.) **	(location)	Landfill (Capital Enviro)
Annual Sweeping Costs		
• Annual budget/expenditure (labor & equipment)**	(\$)	\$5,700
• Hourly or lane mile contract rate **	(\$/hr. or ln mi.)	\$5,700 (Rented Sweeper)
• Disposal cost**	(\$)	\$5,641.70
Sweeping Equipment		
• Rotary brush street sweepers owned/leased	(#)	0
• Vacuum street sweepers owned/leased	(#)	0
• Vacuum street sweepers specified in contracts	(y/n)	N
• % Roads swept with rotary brush sweepers **	%	100%
• % Roads swept with vacuum sweepers **	%	0

Reduction (since beginning of permit coverage) in application on public land of: ("N/A" = never used; "100%" = elimination)		
▪ Fertilizers	(lbs. or %)	0
▪ Herbicides	(lbs. or %)	0
▪ Pesticides	(lbs. or %)	0
Integrated Pest Management (IPM) Practices Implemented	(y/n)	No

	(Preferred Units)	Response
Average Ratio of Anti-/De-Icing products used ** (also identify chemicals and ratios used in specific areas, e.g., water supply protection areas)	% NaCl % CaCl ₂ % MgCl ₂ % CMA % Kac % KCl % Sand	90% NaCl 10% Sand
Pre-wetting techniques utilized **	(y/n or %)	No
Manual control spreaders used **	(y/n or %)	Yes
Zero-velocity spreaders used **	(y/n or %)	No
Estimated net reduction or increase in typical year salt/chemical application rate	(±lbs/lb mi. or %)	0
Estimated net reduction or increase in typical year sand application rate **	(±lbs/lb mi. or %)	0
% of salt/chemical pile(s) covered in storage shed(s)	(%)	100%
Storage shed(s) in design or under construction	(y/n or #)	No
100% of salt/chemical pile(s) covered in storage shed(s) by May 2008	(y/n)	No

Water Supply Protection

Storm water outfalls to public water supplies eliminated or relocated	# or y/n	N/A
Installed or planned treatment BMPs for public drinking water supplies and their protection areas	# or y/n	N/A
Treatment units induce infiltration within 500-feet of a wellhead protection area	# or y/n	N/A

Operations and Maintenance Plan

FOR

Town of Douglas, MA

MARCH 2018

Prepared For:

Town of Douglas

29 Depot Street
Douglas, MA 01516

Prepared By:

Comprehensive Environmental, Inc.

225 Cedar Hill Street
Marlborough, MA 01752



O&M Plan, Introduction

1.0 Introduction

Stormwater runoff contains pollutants such as hydrocarbons (oil, gas), heavy metals (iron, lead), fine sediment, chemicals and bacteria (fecal coliform, E.coli) that can be harmful to humans and the surrounding environment. **Table 1** shows some common stormwater pollutants, the source of these pollutants, and the impacts they have on the surrounding environment.

The Environmental Protection Agency (EPA) regulates stormwater discharges from municipal systems, such as Douglas', through the National Pollutant Discharge Elimination System (NPDES) Municipal Separate Storm Sewer System (MS4) permit program within its regulated urbanized area (see **Figure 1** and **Figure 2**). Under this program, Douglas is required to develop written operation and maintenance (O&M) procedures to reduce the impact of stormwater runoff from municipal operations and facilities. This O&M plan provides a series of Standard Operating Procedures (SOPs) for Town personnel to use at Town-owned facilities within the regulated area and when performing certain O&M tasks.

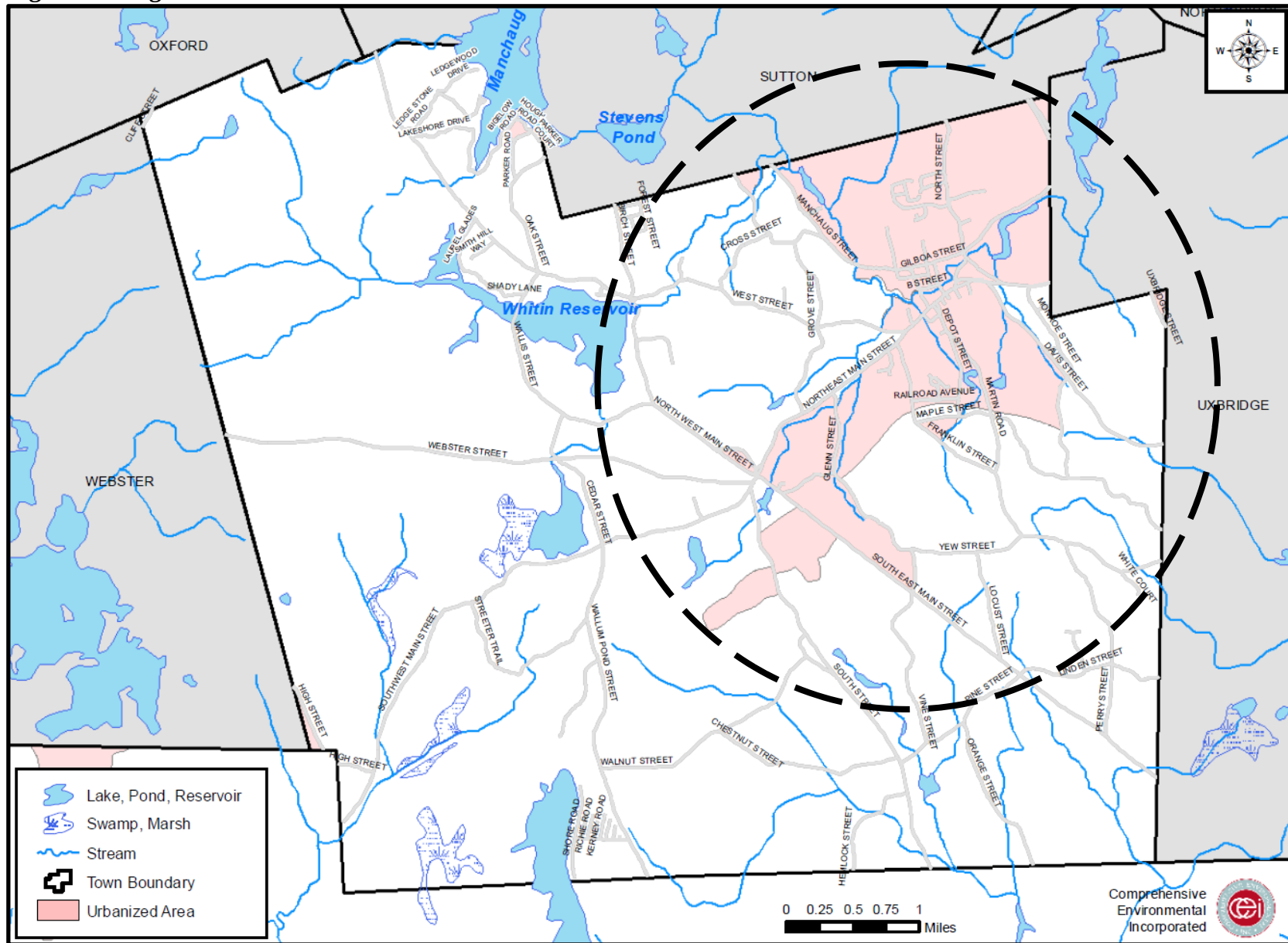
Table 1 – Typical Stormwater Pollutants, Sources and Impacts

Pollutant	Source(s)	Impact(s)
Sediment	Construction sites; eroding streambanks and lakeshores; winter sand and salt applications; vehicle /boat washing; agricultural sites.	Destruction of plant and fish habitat; transportation of attached oils, nutrients and other pollutants; increased maintenance costs.
Nutrients (phosphorus, nitrogen)	Fertilizers; malfunctioning septic systems; livestock, bird & pet waste; vehicle/boat washing; grey water; decaying grass and leaves; sewer overflows; leaking trash containers; vehicle/equipment exhaust.	Increased potential for nuisance or toxic algal blooms; increased potential of hypoxia/anoxia (low levels of dissolved oxygen that can kill aquatic organisms.)
Petroleum Hydrocarbons (PAHs, VOCs, etc.)	Vehicle and equipment leaks; vehicle and equipment emissions; pesticides; fuel spills; equipment cleaning; improper fuel storage & disposal.	Toxic at low levels.
Heavy Metals	Vehicle, brake & tire wear; vehicle & equipment exhaust; batteries; paint and wood preservatives; galvanized metal; fuels; pesticides; cleaners.	Toxic at low levels; drinking water contamination.
Pathogens	Livestock, bird & pest wastes; malfunctioning septic systems; sewer overflows or improper connections.	Risk to human health leading to closure of shellfish areas and swimming areas; drinking water contamination.
Toxic Chemicals	Pesticide use; spills; illegal discharges; leaks; manufacturing.	Toxic at low levels.
Debris/ Litter	Improper waste disposal and storage; fishing gear; leaking rubbish containers; littering.	Potential risk to human and aquatic life.



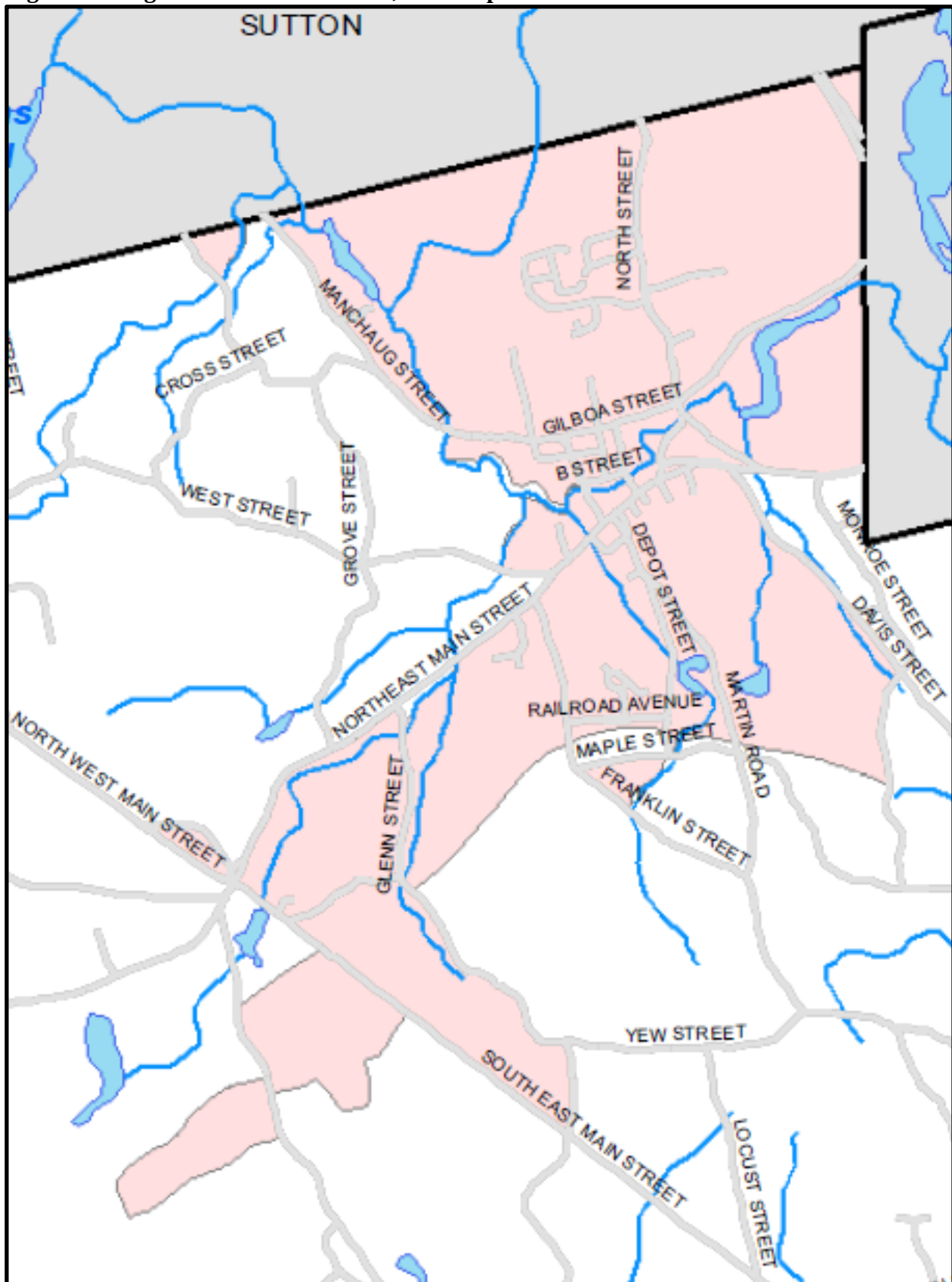
O&M Plan, Introduction

Figure 2 – Regulated Urbanized Area



O&M Plan, Introduction

Figure 3 – Regulated Urbanized Area, Close-Up



O&M Plan, SOPs and Purposes

2.0 SOPs and Purposes

The purpose of the SOPs is to provide a uniform approach for typical municipal operations and facility activities to reduce and eliminate contamination that may enter the Town's stormwater drainage system and water resources. SOPs have been divided into the following categories for easier use, and each category has been given an abbreviation for easy indexing. The general purpose and focus for each category is described further below.

- **Municipal Infrastructure** (MI)
- **Vehicle Maintenance and Storage Yards** (VM)
- **Spill Prevention, Response and Reporting** (SR)
- **Parks and Open Space** (PO)
- **Building and Facilities** (BF)
- **Construction Management** (CM)

Municipal Infrastructure (MI)

- Ensure adequate maintenance of municipal infrastructure
- Minimize pollution to waterbodies due to municipal operations

Vehicle Maintenance and Storage Yards (VM)

- Ensure proper storage and maintenance of vehicles and equipment
- Minimize pollution due to vehicle and equipment washing and fueling activities
- Ensure proper storage of materials stored outdoors
- Ensure proper storage of sand and salt to minimize pollution potential

Spill Prevention, Response and Reporting (SR)

- Minimize pollution potential due to product spills
- Outline proper response procedures to minimize spill impacts
- Document material disposal procedures and spill reporting requirements

Parks and Open Space (PO)

- Ensure proper management of landscaping, proper mowing and irrigation
- Minimize erosion potential on unstable areas
- Minimize pollution due to pet waste
- Ensure proper storage and application of fertilizers and pesticides

Building and Facilities (BF)

- Ensure proper good housekeeping practices associated with building washing and repair
- Minimize pollution due to dumpsters and other solid wastes
- Minimize potential safety hazards and spills while transferring oil and similar products
- Ensure proper storage of oil, hazardous waste, and flammable products

Construction Management (CM)

- Outline proper maintenance of erosion and sediment controls
- Document site inspection procedures



O&M Plan, List of SOPs

3.0 List of SOPs

As noted previously, SOPs have been divided into the categories for easier use, and each category has been given an abbreviation and color-coded for easy indexing:

- **Municipal Infrastructure** (MI)
- **Vehicle Maintenance and Storage Yards** (VM)
- **Spill Prevention, Response and Reporting** (SR)
- **Parks and Open Space** (PO)
- **Building and Facilities** (BF)
- **Construction Management** (CM)

An index for SOPs of each type are as follows:

Municipal Infrastructure (MI)

- MI-1: Street Sweeping**
 - Street Sweeping Log
- MI-2: Catch Basin Cleaning and Inspection**
 - Catch Basin Cleaning Inspection Log
 - Catch Basin Maintenance/Repair Log
- MI-3: Outfall Inspection & Maintenance**
 - Dry Weather Outlet Inventory and Inspection
 - Outfall Maintenance/Repair Log
- MI-4: Stormwater & Water Line Maintenance**
- MI-5: Asphalt Cleaning & Repair**
- MI-6: BMP Inspection & Maintenance**
 - BMP Inspection and Maintenance Log
- MI-7: Oil/Water Separator (OWS)**
 - Oil/Water Separator Inspection Log
- MI-8: Snow Stockpiling/Removal**
- MI-9: Sand & Salt Application**

Vehicle Maintenance and Storage Yards (VM)

- VM-1: Vehicle & Equipment Storage & Maintenance**
- VM-2: Vehicle & Equipment Washing**
- VM-3: Vehicle & Equipment Fueling**
- VM-4: Sand & Salt Storage**

Spill Prevention, Response and Reporting

- SR-1: Spill Response**
- SR-2: Spill Reporting**
- SR-3: Emergency Contact Information**

Parks and Open Space (PO)

- PO-1: Landscape Design & Management**
- PO-2: Lawns & Grounds Maintenance**
- PO-3: Pet Waste & Litter**
- PO-4: Storage & Use of Pesticides & Herbicides**
- PO-5: Storage & Use of Fertilizers**

Buildings and Facilities (BF)

- BF-1: Building Operations**
- BF-2: Solid Waste Management**
- BF-3: Material Loading/Unloading**
- BF-4: Material Storage**

Construction Management (CM)

- CM-1: Erosion & Sedimentation Control**
- CM-2: Construction Site Inspection**
 - Construction Site Stormwater Inspection Report



Municipal Infrastructure (MI)

MI-1: Street Sweeping

- Street Sweeping Log

MI-2: Catch Basin Cleaning and Inspection

- Catch Basin Cleaning Inspection Log
- Catch Basin Maintenance/Repair Log

MI-3: Outfall Inspection & Maintenance

- Dry Weather Outlet Inventory and Inspection
- Outfall Maintenance/Repair Log

MI-4: Stormwater & Water Line Maintenance

MI-5: Asphalt Cleaning & Repair

MI-6: BMP Inspection & Maintenance

- BMP Inspection and Maintenance Log

MI-7: Oil/Water Separator (OWS)

- Oil/Water Separator Inspection Log

MI-8: Snow Stockpiling/Removal

MI-9: Sand & Salt Application

Vehicle Maintenance and Storage Yards (VM)

VM-1: Vehicle & Equipment Storage & Maintenance

VM-2: Vehicle & Equipment Washing

VM-3: Vehicle & Equipment Fueling

VM-4: Sand & Salt Storage

O&M Plan, List of SOPs

Spill Prevention, Response and Reporting (SR)

SR-1: Spill Response

SR-2: Spill Reporting

SR-3: Emergency Contact Information



O&M Plan, List of SOPs

Parks and Open Space (PO)

- PO-1: Landscape Design & Management**
- PO-2: Lawns & Grounds Maintenance**
- PO-3: Pet Waste & Litter**
- PO-4: Storage & Use of Pesticides & Herbicides**
- PO-5: Storage & Use of Fertilizers**



O&M Plan, List of SOPs

Building and Facilities (BF)

- BF-1: Building Operations**
- BF-2: Solid Waste Management**
- BF-3: Material Loading / Unloading**
- BF-4: Material Storage**



O&M Plan, List of SOPs

Construction Management (CM)

CM-1: Erosion & Sedimentation Control

CM-2: Construction Site Inspection

- Construction Site Stormwater Inspection Report

