



Town of Holden
Department of Public Works



5/3/13

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Isabel F McCauley
Senior Civil Engineer

May 1, 2013

Glenda Velez
U.S. Environmental Protection Agency - Region 1
5 Post Office Square – OEP06-01
Boston, MA 02109-3912

Re: NPDES Phase II Small MS4 General Permit
Town of Holden, Massachusetts Annual Report
MADEP Transmittal No. W040559
EPA Permit Number MAR041121

Dear Ms. Velez,

The Town of Holden, Massachusetts is pleased to provide you with the attached National Pollutant Discharge Elimination System (NPDES) Phase II Small MS4 General Permit Annual Report for the period from April 1, 2012 to March 31, 2013. In general, the Town has continued the development of their stormwater management program and has continued to implement activities in accordance with regulatory requirements as available funding is accessible.

Should you have any questions, please do not hesitate to call me at (508) 210-5548.

Sincerely,

Isabel F McCauley
Senior Civil Engineer

cc: Fred Civian, MA DEP

Attach: As stated



May 1, 2013

Glenda Velez
U.S. Environmental Protection Agency - Region 1
5 Post Office Square – OEP06-01
Boston, MA 02109-3912

Fred Civian, Stormwater Coordinator
Massachusetts Department of Environmental Protection
One Winter Street
Boston, MA 02108

RE: NPDES Phase II Small MS4 General Permit
Town of Holden, Massachusetts Annual Report
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Isabel F. McCauley
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Municipality/Organization: Town of Holden, MA

EPA NPDES Permit Number: MAR041121

MA DEP Transmittal Number: W040559

Annual Report Number

& Reporting Period: No. 9: April 1, 2012 -March 31, 2013

**NPDES Phase II Small MS4 General Permit
Annual Report**

Part I. General Information

Contact Person: Isabel McCauley

Title: Senior Civil Engineer

Telephone #: (508) 210-5548

Email: imccauley@holdenma.gov

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: Jacquelyn Kelly

Title: Town Manager

Date:

Part II. Self-Assessment

The Town of Holden has successfully implemented or begun implementation of several Measurable Goals noted in Holden's Notice of Intent. Prior to the development of Holden's Comprehensive Stormwater Management Program, including Measurable Goals, the Town had an assessment performed of current activities, programs and regulations that could support the NPDES Phase II Stormwater Program. This assessment became the basis for modifying current activities, recommending new programs, and informing Town boards and departments of their obligation toward successful implementation of Holden's Comprehensive Stormwater Program.

During permit Year 10, the Town continued the development of its local stormwater bylaws, including passage of the Illicit Discharge Control bylaw at Town meeting, updated its Illicit Discharge Detection and Elimination (IDDE) plan based on the 2010 draft MS4 General Permit, conducted audits of municipal buildings as part of their IDDE program, and coordinated public outreach/participation and construction inspection efforts through its partnership with the Massachusetts Department of Conservation and Recreation (DCR) and the Wachusett Greenways. Additionally, the Town has been actively participating in the work performed by the Central Massachusetts Regional Stormwater Coalition (Coalition). The Coalition was funded in May 2012 by a Community Innovation Challenge (CIC) grant from the Massachusetts Executive Office of Administration and Finance. The goal of the Coalition is to develop a regional stormwater management program that aids participant communities on complying with the requirements of the MS4 General Permit. Details of the work completed through the Coalition are described in this Report.

Holden is pleased to present the following summary describing the Town's success at implementing the program through the tenth year of the Town's Comprehensive Stormwater Program.

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 1 through 10	Planned Activities – Permit Year 11
1	Create a Stormwater Program	Department of Public Works Planning Board Conservation Commission Board of Health Board of Selectmen	Holden will present to the public at public meeting Holden's draft Comprehensive Stormwater Management Program.	Compliant in year 1. The Town of Holden has completed <i>Stormwater Management Phase II Assessment</i> report. Copies are available for review by town departments and the public.	Upon issuance of the new EPA MS4 General Permit, the Town of Holden will schedule a presentation with the Board of Selectmen and later a public meeting to review and update the existing Comprehensive Stormwater Program to meet the new permit requirements.
2	Create a Stormwater Program	Department of Public Works Planning Board Conservation Commission Board of Health Board of Selectmen	Holden will identify appropriate sources of funding assistance (SRF, 319 Grant Program, 604(b) Grant Program, Lakes and Ponds Grant Program, Source Water Protection Grant Program, Recycling Grant Program) and apply for assistance in implementing portions of Holden's Comprehensive Stormwater Management Program, including public education and outreach.	Year 9: The Town of Holden received funding from the Department of Conservation and Recreation (DCR), formerly the Metropolitan District Commission (MDC) for regulations development related to stormwater management. Through this funding, the Town of Holden finalized and adopted a new Stormwater Management bylaw. Year 10: The Town of Holden and 12 other communities within Central Massachusetts have established the Central Massachusetts Regional Stormwater Coalition (Coalition) using a Community Innovation Challenge (CIC) grant to develop a regional municipal stormwater program.	In February 2013, the CIC Grant Program has awarded \$115,000 to allow 17 additional communities to join the Coalition and to continue with the implementation of the Central Massachusetts regional stormwater program.

1. Public Education and Outreach (Continued)

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 1 through 10	Planned Activities – Permit Year 11
3	Address specific groups	Department of Public Works Board of Health	Distribute EPA and other relevant educational brochures to targeted audiences. Distribution points include Town hall, Library, and Transfer Station	Year 8: The Town of Holden is in receipt of EPA educational materials on disk for easy printing and distribution. Year 9: The Town of Holden provided several informational brochures to the public including Recycling Information, Requirements for Construction over 1 acre, Earth Day events, Mercury Collection by the Massachusetts Board of Health. Holden partnered with Rangers from the DCR to educate 1,788 persons at over 20 separate events on the local watershed and stormwater protection. Letters explaining the MS4 permit and a flyer on Best Management Practices for the Food Service Industry were mailed to each food establishment licensed by the Holden Board of Health. The DEP's Horsekeepers' Best Management Practices Guidelines were sent to owners in Holden that have horses. Year 10: The Town provided several informational brochures to the public including Recycling Calendar, Earth Day events, Mercury Collection by the Massachusetts Board of Health. Holden partnered with Rangers from the DCR to educate 1,341 persons at over 24 events on local watershed and stormwater protection.	Relevant educational brochures will continue to be printed and made available at town buildings. A box deposit for "Button Cell Battery Recycling Program" will continue to be present in the Town Hall.

1. Public Education and Outreach (Continued)

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 1 through 10	Planned Activities – Permit Year 11
4	Address specific groups	Department of Public Works Board of Health Planning Department	The Town of Holden will compile a library of educational materials that can be distributed to youth organizations, the Garden Club, etc. EPA stormwater BMP's targeting specific activities and audiences will be included	Year 8: the Town presented several brochure/information to the public. Year 9: The Town of Holden presented several brochure/information to the public. The Town offered brochures described in BMP #3 as well as information listed on the Town website and brochures enclosed with the monthly Holden Municipal Light Bill. Brochures sent to residents include: - "Wachusett Earthday Collection" a yearly brochure describing the Household Hazardous Product and Recycling Event - Town of Holden, a Resident's Guide to DPW Snow Removal Operations and Procedures - "2012 Recycling Calendar" Information included on the Town website includes: - "Trash and Recycling Calendar" - "Leaf Composting and Brush Chipping Schedule" - "Septic System Maintenance." - "Trash Collection by Street" Year 10: The Town continued to present the information described above in Year 9. Also, the Town received the following cable ready DVD's from the DCR: - "After the Storm", - "Reduce Runoff, Slow it Down, Spread it Out, Soak It In", - "Think Again, Think Blue MA" and - "Cityscope Clean Water Act and Stormwater" Through the Coalition, the Town was granted the rights to broadcast the documentary "Liquid Assets: The story of our water infrastructure" produced by Penn State University.	Relevant educational brochures/information will continue to be made available to the public. Relevant information will continue to be made available on the Town website. The Town will coordinate the broadcasting and advertisement of the documentaries acquired in Permit Year 10 on Holden's Local Access Cable Station.

1. Public Education and Outreach (Continued)

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 1 through 10	Planned Activities – Permit Year 11
5	Target groups likely to impact stormwater	Department of Public Works Board of Health Planning Department	Brochures targeting specific audiences and activities will be available. These target groups include homeowner and lawn maintenance activities, disposal of household waste, and pet maintenance. Other groups include commercial business and waste disposal, parking lot maintenance, and floor drains. Educational brochures on the proper disposal of household hazardous wastes will be attached to transfer station permits.	Year 8: The Town of Holden presented several brochure/information to the public. The Town offered brochures/information described in BMPs #3 and #4. Also, the DPW provided written notice to residents for practices that violate Town regulations. Year 9: All newly permitted parking lots have been reviewed and included structural and non-structural BMP's including regular street sweeping and maintenance requirements. Year 10: The Town has continued to make available the information/brochures described in BMPs #3 and #4. Also, the Town has received the documentaries described in BMP #4. Through the Coalition, the Town has access to water quality monitoring kits from the World Water Monitoring Challenge program which builds public awareness and involvement in protecting water resources by engaging citizens to conduct basic monitoring of their local water bodies.	The Town DPW will continue to inform the public regarding stormwater protection practices. The Town will coordinate the broadcasting and advertisement of the documentaries recently acquired on Holden's Local Access Cable Station. The Town will investigate opportunities to present the water quality monitoring kits to targeted audience.
6	Promote household waste recycling	Department of Public Works Board of Health MIS Department	The Town of Holden and the Board of Health will promote recycling and hazardous waste collection opportunities through brochures and postings on the Town's website and local access channel.	Year 8 and 9: The Town of Holden advertised the yearly hazardous waste collection event via brochures (enclosed in the Holden Municipal Light Bill), website and public access television Year 10: The Town advertised the hazardous waste collection events via brochures (enclosed in the Holden Municipal Light Bill), website and public access television.	Brochures/information will continue to be made available to the public. In partnership with the Wachusett Watershed Regional Recycling Center the Town will continue to advertise the hazardous waste collection events.

1. Public Education and Outreach (Continued)

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 1 through 10	Planned Activities – Permit Year 11
7	Utilize local public access channel	Department of Public Works Board of Health	Links to stormwater BMP's and other water quality education resources, including EPA and DEP will be posted on the Town of Holden's website: http://www.townofholden.net/	Year 8 and 9: The Town of Holden website has several web links to environmental and public health organizations and other environmental information, including the DEP and the EPA. Year 10: As previously described in BMP #4, the Town has received 5 documentaries for broadcasting on the local access channel. The Coalition developed an educational website, www.central.mastormwater.org focused on providing information about the project to a number of audiences including the general public, educators and kits. Through the Coalition, the Town has access to an Envirosearch table focused on non-point source pollution. This is a portable interactive environmental education model intended for use in schools and community education on issues that affect the environment.	The Town will coordinate the broadcasting and advertisement of the documentaries recently acquired on Holden's Local Access Cable Station. The Town will add to its website a link to the Coalition's website. The town will investigate opportunities to partnership with schools for the presentation of the Envirosearch model to various audiences.
8	Utilize local public access channel	Department of Public Works Board of Health	Stormwater BMP's, solicitation for stream team cleanup volunteers, and EPA produced water quality videos will be considered for presentation on Holden's public access channel.	Year 8 and 9: DCR was contacted to use their copy of the EPA presentation, "<i>After the Storm</i>" that is in cable-ready format. Year 10: As described under BMP #4, the Town received copies of 4 cable ready DVD's from the DCR and a copy of a documentary from Penn State University. All of these videos are aimed to educate the public on stormwater management.	The Town will coordinate the broadcasting and advertisement of the documentaries recently acquired on Holden's Local Access Cable Station.

1. Public Education and Outreach (Continued)

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 1 through 10	Planned Activities – Permit Year 11
9	Develop, conduct and document educational programs	Department of Public Works	The Town of Holden Water Department will apply for funding assistance from DEP's Source Water Protection Program for grant assistance to develop wellhead protection plans and stormwater management plans within Zones II. The proposed tasks will include education component.	Year 2: The DCR worked in advanced with the teachers and conducted watershed training for two classes of 4th grade students at the Mayo School and three classes at the Dawson School, each taking one hour. DCR conducted a watershed field trip with 50 students in 4th grade at Mayo School, and for 70 students in 4th grade at Dawson School, each taking 6 hours. Year 10: As described above, the DCR worked with Holden education staff and conducted training and workshops related to forest succession, watershed history and mapping. There were also several watershed field trips conducted. A total of fourteen events were performed which engaged 1,341 4th grade students.	The Town of Holden will continue to work on a combined effort with the DCR to educate students and the public.

1. Public Education and Outreach (Continued)

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 1 through 10	Planned Activities – Permit Year 11
10	Conduct public meetings/create citizen panels	Board of Selectmen Department of Public Works	The Town of Holden will contact the Nashua River Watershed Association to review opportunities in Holden. These opportunities include hosting a watershed association meeting in Holden with notice on website and local access channel, and televising a meeting reviewing watershed activities or needs specific to Holden	Year 8 and 9: The Wachusett Greenways provided recreational trail maintenance within the Town of Holden. The DCR has regulatory jurisdiction (350CMR 11) over much of the land bordering waterways in Holden (within 400 feet of water) including regulating land use and density. Through the Town's partnership, the Nashua River Watershed Association has included stormwater related protection for the Town of Holden in its 5 (five) year action plan. The plan includes acquiring GIS capacity, recreation, open space protection, and water quality. The Association also suggests potential funding sources. The watershed association website is: www.nashuariverwatershed.org Year 10: The Town has continued to collaboratively work with the Wachusett Greenways and DCR to protect and maintain the watershed land within the Town.	The Town of Holden will continue to work with the Wachusett Greenways, DCR, and Nashua River Watershed Association to determine opportunities for collaboration.

2. Public Involvement and Participation

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 1 through 10	Planned Activities – Permit Year 11
11	Community cleanups	Department of Public Works MIS Department Board of Selectmen	Town of Holden will coordinate local stream team cleanups with area Scout groups. Town will provide notice of event on local access channel and website.	Year 8 and 9: Wachusett Greenways is a volunteer based organization that provides trail development in several communities, including Holden. The Holden DPW worked with Wachusett Greenways on trail construction, which includes proper drainage. The DCR has regulatory jurisdiction (350CMR 11) over much of the land bordering waterways in Holden (within 400 feet of the water) including regulating land use and density. Year 10: The Wachusett Greenways provided maintenance to the Central Mass Rail Trail. The Town was provided with a stencil for catch basins from the DCR. Through the Coalition's website public in general is encouraged to become volunteers to help address stormwater concerns. The Coalition developed a presentation on stormwater management focused on educating elected officials and municipal department head on the requirements of the MS4 General Permit.	The Town of Holden will continue to work with the DCR and Wachusett Greenways to protect the quality of waterways within Holden and to provide environmentally safe public recreation opportunities. The Town intends to stencil catch basins that were encountered with accumulation of pet waste.

3. Illicit Discharge Detection and Elimination

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 1 through 10	Planned Activities – Permit Year 11
12	Mapping of storm water management infrastructure	Department of Public Works Planning Department	Holden will develop a multi-year plan to complete mapping of entire storm drain system. Development of plan will include review of water, sewer, and other infrastructure.	Year 8: The Town of Holden completed mapping under the IDDE of Urbanized Area (UA). The outfalls within the UA were surveyed. Survey information included condition, presence of dry weather flows, location, source of flow, and receiving water body. The outlet locations were mapped using AutoCAD and MassGIS. Year 10: The Coalition had created an integrated mapping and inspection database. The database can be access by all members into a single GIS-based system, accessible online. The Town's mapping system has been integrated to the Coalition's database. Through the Coalition, the Town has access to a share GPS surveying device that can be used to map existing and new structures. The Town has also obtained its own tablet computer to be used during inspections of the stormwater system intended to create an asset management system.	The Town of Holden will continue to refine the details of the stormwater management infrastructure and database during Operations and Maintenance (O&M) and IDDE activities. On a rotating schedule, the Town will use the GPS surveying unit to continue to map the stormwater system. The Town intends to utilize the tablet computer during stormwater maintenance operations.

3. Illicit Discharge Detection and Elimination (Continued)

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 1 through 10	Planned Activities – Permit Year 11
13	Identification/ description of problem areas	Department of Public Works	Holden will develop and implement an Illicit Discharge Detection and Elimination (IDDE) plan.	Year 9: Follow up activities from Permit Year 8 were conducted. Outfalls exhibiting elevated /anomalous conditions were resampled with clean results. As part required by the IDDE plan. Year 10: The Town contracted the services of an environmental consultant to update its IDDE plan. The Town has an updated IDDE plan that includes the requirements of the 2010 MS4 Draft Permit. The Coalition developed a Standard Operating Practice (SOP) "Locating Illicit Discharges" intended to define the types of illicit discharges and provide tools to identify each. The Coalition developed an IDDE Documentation Packet, which specifies how illicit discharges are detected and what department or person is responsible for ensuring elimination. The Coalition developed a Sump Pump Discharge policy. Through the Coalition, the Town has access to water quality field kits and meters which are focused on identifying illicit discharges.	The Town will continue to implement the requirements of the updated IDDE plan. The Town is studying available options to best implement the recommendations and policies identified in the SOP, IDDE Document Packet and Sump Pump policy. On an as needed basis, the Town intends to use the water quality kits available through the Coalition to detect illicit discharges.

3. Illicit Discharge Detection and Elimination (continued)

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 1 through 10	Planned Activities – Permit Year 11
14	Enforcement procedures addressing illicit discharges	Department of Public Works Planning Department	Holden will review whether local authority is appropriate and able to respond to potential illicit discharges. New by-laws, if necessary, will be proposed. DCR grant will support this effort.	Year 9: The Town was in the process of finalizing a new IDDE bylaw that went before Town Meeting in Spring 2012. Year 10: The Town has adopted a new Illicit Discharge Control bylaw on May 21, 2012.	The Town will continue to implement the requirements of the Illicit Discharge Control bylaw.
15	Initiation of recycling programs	Department of Public Works Board of Health	Holden will apply for funding assistance from DEP's Recycling Grant Program for assistance in public education and the purchase of recycling materials.	Year 10: The Town continued to advertise the Recycling and Household Hazardous Product Collection events via brochures (enclosed in the Holden Municipal Light bill), website and public access television.	The Town in collaboration with the Wachusett Watershed Regional Recycling Center will continue to advertise the Hazardous Product Collection Events. The Town will continue to monitor funding sources for applicability for recycling.

4. Construction Site Stormwater Runoff Control

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 1 through 10	Planned Activities – Permit Year 11
16	Bylaw: Storm water management regulations for construction sites 1 acre or larger	Planning Board Conservation Commission Town Counsel Board of Health Zoning Board of Appeals	Holden will review model by-law developed by DEP in consultation with the Attorney General's Office.	Year 9: The DPW placed a poster titled "Is your construction project disturbing 1 or more acres of land..." within the Town Hall for public viewing. This poster describes EPA regulations; The Town of Holden drafted and Town Meeting passed a new local ordinance: Stormwater Management and Erosion Control Bylaw which regulates construction in areas 20,000 square feet and larger or more or disturbs land with 15% or greater slope where the land disturbance is greater than or equal to 400 square feet within the sloped area. Year 10: The Town has continued to enforce the State and Federal stormwater regulations on new and redevelopment. The Coalition developed a SOP "Erosion and Sedimentation Control" intended to help communities minimize land disturbance addressing design, planning, construction, and inspection tools. The SOP outlines inspection requirements for BMPs for long-term purpose.	The Town will work on implementing the stormwater regulations related to the new bylaw. The Town intends to incorporate the SOP "Erosion and Sedimentation Control" in the implementation of the new bylaw as applicable.
17	Bylaw: Procedures for creating a Storm Water Pollution Prevention Plan (SWPPP)	Planning Board Conservation Commission Town Counsel Board of Health Zoning Board of Appeals	Utilizing funding assistance from MDC grant, Holden will review current by-laws and develop and recommend approval for by-laws responding to MM4.	Year 9: The Town of Holden drafted and Town Meeting passed a new local ordinance: Stormwater Management and Erosion Control Bylaw. Year 10: The Town has continued to enforce the State and Federal stormwater regulations on new and/or redevelopments.	The Town will work on implementing the stormwater regulations related to the new bylaw.

Additional Activities: DCR, in partnership with the Town of Holden, inspected a total of 81 dry weather and 42 wet weather inspection at 14 different construction sites in the Town of Holden. No violations were observed.

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 1 through 10	Planned Activities – Permit Year 11
18	Bylaw: Require post-construction runoff controls	Planning Board Conservation Commission Town Counsel Board of Health Zoning Board of Appeals	Holden will review model by-law developed by DEP in consultation with the Attorney General's Office	Year 9: The DPW placed a poster titled "Is your construction project disturbing 1 or more acres of land..." within the Town Hall for public viewing. This poster describes EPA regulations; The Town of Holden drafted and Town Meeting passed a new local ordinance: Stormwater Management and Erosion Control Bylaw which regulates construction in areas 20,000 square feet and larger or more or disturbs land with 15% or greater slope where the land disturbance is greater than or equal to 400 square feet within the sloped area. Year 10: The Town has continued to enforce the State and Federal stormwater regulations on new and/or redevelopments. The DCR staff constantly monitors agricultural sites for stormwater and manure run off. The Coalition's website includes a BMP Toolbox section (still under development) which is intended to compile the stormwater post-development tools currently permitted for small development or redevelopment.	The Town will work on implementing the stormwater regulations related to the new bylaw. The Town will work with the Coalition to complete the development of the BMP Toolbox section.
19	Identify structural and non-structural long-term runoff control strategies BMPs	Planning Board Conservation Commission Town Counsel Board of Health Zoning Board of Appeals	Utilizing funding assistance from MDC grant, Holden will review current by-laws and develop and recommend approval for by-laws responding to MM5.	Year 9: The Town of Holden drafted and Town Meeting passed a new local ordinance: Stormwater Management and Erosion Control Bylaw. Year 10: The Town has continued to enforce the State and Federal stormwater regulations on new and/or redevelopments.	The Town will work on implementing the stormwater regulations related to the new bylaw.

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 1 through 10	Planned Activities – Permit Year 11
20	Develop a municipal Operations and Maintenance Plan	Department of Public Works	Using regulations and recommendations from DEP and EPA, Holden will develop and update an operations and maintenance plan to include proper disposal of street sweepings, catchbasin cleanout, snow disposal, roadway deicing procedures, vehicle washing, and outside storage of materials.	Year 1-10: The Town of Holden DPW cleans catch basins and sweeps all streets yearly. The Town notifies residents of the street sweeping schedule in the newspaper and on the Town website. Year 10: The Town has stopped using sand except for ice storms and began using a treated salt (enhanced de-icing salt containing a pre-wetting agent, coloring agent and a corrosion inhibitor) for snow treatment. The Town contracted the services of an environmental consultant to perform an audit of municipal buildings focused on pollution prevention and good housekeeping. Fourteen buildings were audited including: Town Hall, Starbuck Bldg, Gale Free Library, Senior Center, Dawson Recreation Center, Damon House, Municipal Light Dept, Hendricks Bldg, Creamer Bldg, Grove Cemetery Bldgs, Trout Brook Reservation Bldg, Old Police Dept. Public Safety, Holden DPW Garage. The Town has implemented all viable recommendations that resulted from the audit. Through the Coalition, the Town has prepared Stormwater Pollution Prevention Site Plans for each of the DPW garages.	The Town will continue to implement the O&M plan regarding catch basins and street maintenance. The Town will review BMPs for applicable O&M practices. The Town has hired an environmental consultant to complete the audit of municipal buildings including four schools (Mayo, Dawson, Davis Hill and Mountview) and all water and sewer pump stations, and to prepare a Spill Prevention Control and Countermeasure Plan for the DPW garages.

6. Pollution Prevention and Good Housekeeping in Municipal Operations (cont'd)

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 1 through 10	Planned Activities – Permit Year 11
21	Develop and implement training programs for municipal employees	Department of Public Works	Holden will send a minimum of 5 public works employees annually to training seminars sponsored by MassHighway, BayState Roads, and other relevant agencies or vendors.	Year 1-10: Town employees attended several trainings on a yearly basis.	The Town of Holden will continue to provide training and educational development opportunities to its employees regarding stormwater pollution prevention. The Town has hired a consultant to conduct training for DPW employees related to Spill Prevention Control and Countermeasure and IDDE.
22	Develop a municipal Operations and Maintenance Plan	Department of Public Works	Holden will implement a formal inspection program, including maintenance logs and scheduling, for catchbasin cleaning, repairs, and new installation.	Year 1-10: The Town of Holden DPW cleans catch basins and sweeps all streets yearly. The Town notifies residents of the street sweeping schedule in the newspaper and on the Town website. As previously mentioned, the Town has acquired a field tablet computer provided with an online database of the Town's stormwater infrastructure to be used during system cleaning and maintenance.	The Town will continue to implement the O&M plan regarding catch basins and street maintenance. The Town will review BMPs for applicable O&M practices. The Town plans on using the field tablet to establish and web-based data management system for the cleaning and inspection activities of the stormwater infrastructure.

6. Pollution Prevention and Good Housekeeping in Municipal Operations (cont'd)

23	Review storm drainage infrastructure needs	Department of Public Works	Holden will consider storm drain improvements in development of annual road maintenance plan subject to funding from Chapter 90	Year 1-10: The Town of Holden DPW performs maintenance to the storm drain infrastructure as needed. Year 10: The Town performed significant drainage improvements on Quinapoxet Street including the adjustment of drainage structures and replacement of 18-inch metal drain pipeline. Other drainage work include the installation, replacement and/or repair of 87 structures and 1,185 feet of piping on various streets as reported in the 2012 Annual Town Report posted on the website.	The Town's DPW will continue to perform maintenance to the storm drain infrastructure as needed.
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7. BMPs for Meeting Total Maximum Daily Load (TMDL) waste Load Allocations (WLA) – NOT APPLICABLE

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 9 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 10
				No TMDLs in the Town of Holden	

7b. WLA Assessment

To date, the Town has focused on completing GIS mapping of the drainage system and receiving waters, as approved by the DEP.

When applicable, the Town will comply with the requirements to meet WLA.