

Municipality/Organization: Lexington #1426

EPA NPDES Permit Number: MAR041042

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Annual Report Number

& Reporting Period: No. 12 April 1, 2014 to March 31, 2015

NPDES Phase II Small MS4 General Permit Annual Report

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: John R Livsey

Title: Town Engineer

Date: 5/1/15

Part II. Self-Assessment

During this reporting period, the Town of Lexington continued to make clear and identifiable improvements to its stormwater management program.

Stream sampling efforts continued through the addition of twenty-four engineering students from UMass Lowell. The students were trained in sampling techniques, organized into teams and sent into the field to sample surface waters. A data team was formed to collect and process all sample data received from the field teams. A total of one hundred and fifty nine laboratory samples were collected in this permit year.

Because the students are trained, when they go into the field, they can approach interested abutting residents and explain the system. These people are, in turn, stream observers.

The sampling teams collected numerous stream samples and are analyzing data from certified lab results. The data is added to the IDDE program data base. In addition to samples collected for lab analysis, two YSI handheld meters were purchased in January of 2015. These meters sample for dissolved oxygen, specific conductivity, and temperature. Each of these parameters are included in the data that the students analyze. Also a colorimeter was purchased and used to sample for chlorine.

IDDE efforts included sanitary sewer relining, with cured in place pipe (CIPP) of 1,900 linear feet along Mill Brook.

Two projects have been designed and are approved for 2015 construction as a result of a rigorous stream study of the three watersheds in Lexington. The first is a stream daylighting project in the Willard's Brook watershed and a bank restoration in the Vine Brook watershed.

A town wide BMP inventory team was created. The team is made up of Town staff from DPW Operations, Engineering Division, Planning and Conservation. Two meetings were held to begin inventory of town wide BMP's. As a result, two staff training's were completed on proper maintenance of structural BMP's.

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 12 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 13
1A	Classroom Education	Engineering/ D. Pavlik & J. McCarron	Design and present elementary-school level session explaining stormwater system	“The Water Cycle” is part of the 3 rd grade curriculum in the Lexington public elementary schools. This is a teachers’ guide developed by Town Conservation and School staff.	Support use of the curriculum and keep it current. Partner with elementary school science coordinator to integrate water quality project into existing educational program. Continue education efforts by offering educational programs to students or other groups of young people.
1A CONT.	Classroom Education	Engineering/ J. Livsey, D. Pavlik and T. Malatesta	Design and present elementary-school level session explaining stormwater system	May 22, 2014 - Presented stormwater demonstration using Enviroscope® to elementary school students during DPW open house.	Present stormwater demonstration to elementary school students at open house. Continue stormwater education during DPW classroom tours of stormwater BMP’s installed at LEED certified facility.
1B	Create and Maintain Stormwater Web Site	Engineering/ Dave Pavlik	Maintain and update stormwater web page.	Posted stormwater updates on engineering and stormwater web page during permit year. Received emails from stakeholders pertaining to stormwater.	Continue to maintain the engineering and stormwater web page during the year. Post permit updates on stormwater web page.
1C	Household hazardous and medical waste collection days	DPW/ R. Beaudoin Health Department/ Gerard Cody	Publish brochure with Recycling and Disposal Guidelines describing hazardous and medical household waste products. In addition host medical and hazardous waste drop days.	Completed 8 drop collection days at DPW Recycling Facility and Town Hall.	Continue program.

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 12 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 13
1D	Education Pamphlets	Engineering / D. Pavlik Conservation/ J. McCarron Engineering / J. Livsey	Offer pamphlets at DPW/Engineering kiosks. Distribute educational material regarding storm water features during DPW facility tour. Send informational storm water mailings to specific neighborhoods.	Pamphlets offered at kiosks in Town buildings: - EPA – “Protecting Water Quality from Urban Runoff” - Stormwater Matters “Stormwater where does it go?” Distributed EPA’s handout “Thirstin’s Water Cycle Adventure” during DPW facility tour and open house.	Place and maintain leaflets in public kiosks. Continue to offer handouts during DPW facility tours and at national public works week DPW open house.
1E	Make use of available media to disseminate information on stormwater	Engineering/ D. Pavlik Conservation/ J. McCarron	Place posters for public display in town buildings. Post video storm water information to LexMedia. Use social media and electronic news outlets.	Lexington Conservation Stewards E-Newsletter was disseminated to approximately 230 recipients in October 2014, November 2014, Dececeember 2014, January 2015, February 2015, and March 2015. The E-Newsletter provides volunteer Stewards with information on local trainings and conservation events, upcoming projects, natural history tidbits, and other information pertaining to land conservation in Lexington.	Continue to use all electronic media outlets such as E-Newsletter to inform public.

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 12 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 13
1F	Newsletter for watershed stewards programs	Conservation/ J. McCarron Engineering/ J. Livsey	Publish newsletter.	Newsletter was published this permit year in electronic format – see control measure 1E. August 2014—article written by Jordan McCarron highlighting volunteer bridge building project at Dunback Meadow Conservation Area and Conservation Stewards program in general; published in Lexington Minuteman. Winter 2014-Article published in American Society of Civil Engineers UMass Lowell Winter Newsletter. Article detailed stormwater monitoring partnership with Town of Lexington Engineering Division.	Continue to publish articles to stimulate involvement and education.
1G	Stream Neighbor Notices	Engineering/D. Pavlik	Inform outfall abutters of water quality and outfall inventory program.	Interns communicated with abutters during outfall inventory and water quality sampling. A letter from the Engineering division is part of the volunteer package that is presented to abutters. This letter details the objective and purpose of the work.	Continue to communicate with stream abutters about water quality and outfall inventory efforts.

2 Public Involvement and Participation

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 12 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 13
2A	Citizen volunteers notify Town staff of poor stream health and stream blockage issues. <i>Replaced Stream Cleanup Day</i>	Conservation/ J. McCarron Engineering/ J. Livsey Highway Dept./ M. Valenti	Maintain stream health and flow by maintaining streams regularly.	Watershed Stewards continually monitored various streams for trash and stream blockage and notify town employees as needed. Notification is by email or phone to Conservation or DPW staff. Currently working on stream blockage and trash clearing with Conservation staff as funded by Town Meeting as part of Highway Operations using hand tools. During this permit year sections of Vine Brook and Clematis Brook were cleared of several stream blockages of woody debris and trash.	Watershed Stewards continue to monitor various streams for trash and stream blockage and notify town employees as needed.
2B	Volunteer Water Quality Monitoring Program	Engineering/ D. Pavlik & J. Livsey Conservation/ J. McCarron	Maintain watershed volunteer program for program sustainability.	Engineering staff expanded the volunteer monitoring program using civil engineering students. The students are from the UMASS Lowell Francis College of engineering. Five teams of 4 students engaged in field work which included outfall observations and taking grab samples for laboratory testing. The outfall observations were recorded on data sheets. The stormwater samples are tested at an EPA approved lab. 159 lab samples have been collected to date. The samples have been tested for Ecoli, surfactants and ammonia concentrations. A two member student data team was formed to process and manage field data.	Continue to support the water quality volunteer monitoring program into the next phase.

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 12 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 13
2C	Storm Drain Markers Installation done with public involvement.	Conservation/ J. McCarron Engineering/ D. Pavlik	Volunteers install storm drain markers at catch basins that drain to town streams.	March 20, 2014 – 100 Storm Drain markers were purchased for installation along Massachusetts Avenue for a volunteer project. This phase of the storm drain marker program will be completed as part of an Eagle Scout project.	Undertake additional volunteer storm drain marker installation.
2D	Direct Mailings done with public involvement.	Conservation/ J. McCarron Engineering/ D. Pavlik	Use volunteers as part of direct mailings for public outreach.	No direct mailings were done this permit year.	Continue program.
2E	Stream Neighbor Notices	Conservation/ J. McCarron Engineering/ D. Pavlik	Inform outfall abutters of water quality and outfall inventory program.	UMASS Lowell interns communicate with abutters during outfall inventory and water quality sampling. A letter from the Engineering division is part of the volunteer package that is presented to abutters. This letter details the objective and purpose of the work.	Continue to communicate with stream abutters about water quality and outfall inventory efforts.

3. Illicit Discharge Detection and Elimination

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 12 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 13
3A	Mapping of storm water outfalls and catchment areas. Mapping sanitary sewer under drain system.	Engineering/ D. Pavlik	Maintain data base for GIS mapping of Town's outfalls. Developed GIS layer of town's sanitary under drain system	Improved and update outfall maps using field investigations work. Work was done by town engineering and highway staff, volunteers and consultant. Drainage maps were revised to reflect findings in the field during the permit year.	Continue to integrate information from field work currently focused on the Mystic river watershed. Review and revise sub-catchment map as needed and integrate into storm water quality program.
3B	DPW Employee Education	Engineering/ D. Pavlik J. Livsey	Education of Town staff on development of Illicit Discharge Detection and Elimination program. Obtained information education guidance manual.	October 28, 2014 Town Engineer and two Engineering Assistants attend MS4 information session presented by EPA region 1. November 25, 2014 Town Engineer and Engineering Assistant attended Mystic River Watershed Municipal Subcommittee meeting at which EPA region 1 presented an information session on the MS4 permit for the Mystic River Watershed communities. Town staff received and reviewed EPA's NPDES emails during the permit year.	Utilize and distribute EPA's NPDES email and other communication. Continue to meet with local watershed associations and attend EPA trainings

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 12 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 13
3C	Stormwater Bylaw	Conservation/ K. Mullins Engineering/ J. Livsey	Implement stormwater bylaw.	Bylaw was passed by Town Meeting in 2008. Bylaw prohibits non-stormwater discharges and pollutants into the MS4 or watercourses in the town and it includes enforcement methods. June 30, 2014 –Town retained the services of an environmental consultant to review and comment on pending stormwater regulations. Meetings between the Town staff and consultant have resulted in guidance for twenty six action items to be considered for revisions in regulations. These revisions are being reviewed by the Town.	Work with consultant and user groups to complete pending stormwater regulations.
3D	Illicit Discharge Recording System	Engineering/ M. Flamang	Record known points of illicit discharge	Maintain data base of points of illicit discharge and corrective action.	Maintain the data of points of illicit discharge and corrective action.
3E	Locate and remediate potential sources of pollution	Engineering/ J Livsey	Direct the work of staff and engineering consultants to repair sanitary sewers.	Weston and Sampson Engineers has been working continuously since 2009 at a high level to clean, survey and repair sewers to stop exfiltration and prevent overflows of sewage into streams. Engineering division and contractors have sealed sections of sanitary sewer to remedy infiltration and exfiltration. Preliminary results of stream sampling show improvement in stream quality.	Continue work on program of comprehensive sanitary sewer repair and renewal.
3E	Locate and remediate potential sources of pollution	Engineering/ M. Flamang	Locate and remove illicit connections to storm drains for approximately 10% of town.	Continue work on program of sanitary sewer repair and sump pump disconnection	Continue work on program of sanitary sewer repair and sump pump disconnection.

3E	Locate and remediate potential sources of pollution	Engineering/ M. Flamang D. Pavlik	Line aging sanitary sewers to prevent exfiltration of sewage into sewer underdrains that flow to streams.	July 2014 – The town lined 1,930 linear feet of twenty one inch sewer along Mill Brook.	Continue to test outfalls in area of relining project.
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3E CONT.	Locate and remediate potential sources of pollution	Engineering/ M. Flamang and D. Pavlik	Purchased additional supplies for water quality testing equipment for IDDE sampling. Continued use of environmental services company to provide laboratory testing on as needed schedule. Expanded volunteer water quality monitoring program to use of environmental engineering students from UMASS Lowell. Updated the “how to guide” for watershed volunteers to use in field for sampling and outfall inventory. Purchased additional equipment for volunteer program.	January 2015 – Town purchased two YSI Professional Plus meters with four meter cables, including DO sensor, conductivity sensor and temperature sensor. Town purchased a LaMotte Smart 3 Colorimeter for chorine concentration. April 2014 to March 2015 – Town Staff continued water quality sampling of known hot spot for illicit connections. Grab samples were taken from outfalls for laboratory testing of <i>E. Coli</i> (MPN/100ml), <i>surfactants</i>(mg/l) and <i>ammonia</i> (mg/l) concentrations. 217 samples were taken over a 10 month period. September 2014 to March 2015 - Expanded volunteer water quality sampling using engineering students from UMass Lowell. Sampling team members monitor specific outfalls weekly and share observations to locate sources of pollution and eliminate them. Two training and education sessions were given to a total of 20 students. Five teams of 3-4 students engaged in field work which included outfall observations, taking grab samples for laboratory testing, and sampling with YSI and colorimeter. The outfall observations were recorded on data sheets. The stormwater samples are tested at an EPA approved lab. 159 lab samples have been collected to date. The samples have been tested for Ecoli, surfactants and ammonia concentrations. An additional data team will handle data input and analysis for the IDDE program.	Manage volunteer and staff effort to expand stream and outfall sampling. Expand sample data base to focus investigations on sources of pollution. Remediate sources when found.
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3E	Locate and remediate potential sources of pollution	Engineering/ J Livsey and Recreation/ K.Simmons	Improve stormwater system in vicinity of Old Res to reduce wet weather contamination.	Construction of water quality improvement project at the Old Res facility was completed in 2013. August 19, 2014 Two separate - one hour BMP maintenance training sessions were given by town's consultant to members of the town's parks and highway operations staff. Training objective is to keep water quality BMP's functioning with proper maintenance.	Maintain the new BMP and monitor results.
3F.	Illicit Discharge Detection and Elimination	Engineering/ J. Livsey, M. Flamang and D. Pavlik.	Completion of IDDE plan.	Work according to the IDDE plan for the year	Continue according to the IDDE plan for the year.

MOVED FROM 2C

3G	Water quality monitoring Old Res <i>Moved from control measure 2c. Renamed and placed in appropriate control measure.</i>	Recreation Dept/ Karen Simmons	Sample and analyze drain outlets into Old Res Recreation Area.	In summer the Old Res is a public swimming pond. This water body is tested weekly in season for bacteria by the Recreation Department.	Continue sampling and reporting.
3H	Septic Systems Tracking Management <i>Moved from control measure 2D. Renamed and placed in appropriate control measure</i>	Health Dept/ K. Fox	Transfer data to electronic media, maintain and upgrade data	Maintained database and created GIS layer to record locations of active septic systems in Town.	Maintain the database.

MOVED FROM 2D

4. Construction Site Stormwater Runoff Control

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 12 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 13
4A	Runoff Control	Conservation/ K. Mullins Engineering/ J. Livsey	Implement stormwater bylaw	June 30, 2014 –Town retained the services of an environmental consultant to review and comment on pending stormwater regulations. Meetings between the Town staff and consultant has resulted in guidance for twenty six action items to be considered for revisions in regulations. These revisions are being reviewed by the Town.	Continue to work with town staff and user groups to implement the bylaw.
4A	Runoff Control	Engineering/ J Livsey	Implement stormwater bylaw	Consolidated DPW inspection administration in Engineering Division to insure that all sites are inspected. Procurement and implementation of an electronic building permitting system is underway. Shared electronic building and stormwater permits will facilitate site inspection and runoff control.	Manage inspection program to assure complete coverage.
4A	Runoff Control	DPW/M. Valenti	Issue notices for construction runoff remediation	Highway superintendent and staff have increased monitoring of construction sites and are issuing notices	Continue to monitor and issue notices.
4B	Inspection Staff Training	Building Department/ Engineering/ J Livsey	Train inspection staff to look for and respond to risky construction site practices	Held joint meetings with engineering, public works and building inspection staff to improve communication between departments with respect to construction site runoff	Continue to hold joint meetings to improve interdepartmental communication.
4B CONT.	Inspection Staff Training	Building Department/ Engineering/ J Livsey	Train inspection staff to look for and respond to risky construction site practices	Inspection staffs of community development and engineering division have been trained and look for construction site erosion.	Update and deliver training to reflect complete stormwater bylaw and regulations.

4C	Inspection and reporting	Engineering/ M. Flamang Conservation/ K. Mullins	Design and distribute handout for permits	During this year, the town staff consistently referred contractors to the EPA construction permit program. Engineering permits have been annotated to require as-builts of privately owned treatment facilities.	Continue to refer applicants for Building Permits to EPA permit program
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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 12 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 13
5A	Inventory Construction Violations	Engineering/ J Livsey	Inspect all construction sites and record findings	Improved communication with Building Department. Inspected construction projects and shared information with Streets Superintendent and Building Commissioner.	Continue to share information on construction sites with other departments.
5B	Develop BMP's list	Engineering/ D. Pavlik	Develop list of BMP's that are appropriate for Lexington public and private projects	Town wide BMP inventory team continued work on data base and GIS layers. The team made up Town staff from DPW operations, Engineering Division, Planning and Conservation worked with town's consultant in this process.	Continue to review plans utilizing MA Stormwater Handbook. Continue development of BMP team.
5C	Post Construction Runoff Control	DPW/M Valenti	Issue notices verbal and in writing for runoff remediation.	Highway superintendent and staff have increased monitoring of sites where construction is complete and are issuing notices	Continue to monitor and issue notices
5D	Runoff Operation and Maintenance Plan	Conservation/ K. Mullins Engineering/ M. Flamang	Require in-house reviewers to screen permit applications for O&M plans	Staff screens permit applications for O&M plans.	Continue to require O&M Plans

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 12 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 13
6A	Employee training	Public Works/ D. Pavlik & D. Pinsonneault	Employee training for stormwater pollution prevention.	June 11, 2014 –A two hour classroom training session presented to public works employees from the parks and highway departments. This training session was presented by the Town’s environmental consultant with the purpose to educate operations staff on the different types of stormwater structural BMP’s and why proper maintenance is important. August 19, 2014 – Two – one hour field training sessions presented to public works employees from the parks and highway departments. This training session was presented by the Town’s environmental consultant with the purpose to educate operations staff on proper field technics for stormwater structural BMP’s such proper mowing techniques of a Bio-retention basin and why proper maintenance is important. In addition a presentation of simple visual inspections of structural BMP’s and how to processes and report maintenance issues.	Continue program

6A	Employee training	Public Works/ D. Pavlik & D. Pinsonneault	Employee training for stormwater pollution prevention.	May 4-7 2014 American Public Works Snow and Ice seminar attending by Highway Superintendent. Topics of proper snow treatment material storage and sustainability for public works operations were presented. October 21, 2014 Baystate Roads Snow and Ice program training. Six highway foreman attend one day seminar on proper material storage and environmental impacts of the proper use of salt and liquid anti-icers.	
6B	Municipal pollution prevention	Public Works/ D. Pinsonneault	Street sweeping and catch basin cleaning.	All town roads were swept at least twice during the year. The center business district is swept three times per week. All town-owned catch basins were cleaned once during the year with a clam shell truck. A Vactor ® truck was used in addition on catch basins that required heavy cleaning.	Continue program
6C	Municipal pollution prevention	Engineering/ John Livsey	Facility maintenance for pollution prevention	Completed an environmental compliance assessment of the public services building. Oil Spill Prevention Control and Countermeasure (SPCC) and Stormwater Pollution Prevention Plan (SWPPP) have been submitted for review and comment.	Bring recommendations to responsible supervisors in the town government organization.
6D	Vehicle washing	Public Works/ D. Pinsonneault	Wash indoors to keep solids from stream	Continued DPW vehicle washing program. All vehicles are washed indoors in a facility that recycles wash water.	Continue program
6E	Used oil recycling	Public Works Operations/ D. Pinsonneault Public Works Solid Waste/ R.Beaudoin	Collect used oil at PW maintenance garage and make used oil recycling available at Town Recycling facility.	Contracted for maintenance garage recycling and offered household waste recycling townwide eight times per year.	Continue program

	Stream Cleaning	Public Works Operations/ M. Valenti	Remove debris from stream channel and banks.	December 2014 & January 2015 - Work crews removed debris from the main channels of Whipple and Monroe Brooks, over a 30 day period. Contracted for maintenance garage recycling and offered household waste recycling townwide eight times per year.	Continue program.
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7. Best Management Practices for Meeting total Maximum Daily Load (TMDL) Waste Load Allocations (WLA)

7A	Pet Waste Pollution Prevention	Conservation/ J. McCarron Town Clerk/ D Hooper	Inform the public on the impact of pet waste on the environment	Distributed leaflet to dog owners when owners purchased dog license. Leaflet seeks to inform owners of the effects of improper waste disposal.	Continue program
7A Cont.	Pet Waste Pollution Prevention	Conservation/ J. McCarron Town Clerk/ D Hooper	Engage the public to participate in proper disposal of pet waste	Continued "Lexington Green Paw" program. Informs dog owners of proper waste disposal methods and issues a stylish Green Paw tag to dogs when owner commits to dispose of waste properly.	Continue program
7B	Locate and remediate potential sources of pollution	Engineering/ M. Flamang D. Pavlik	Line aging sanitary sewers to prevent exfiltration of sewage into sewer underdrains that flow to streams.	Completed lining project for Mill Brook vicinity in 2014.	Continue stream sampling in area of lining contract.
7B	Stream Restoration	Engineering and Conservation/ J. Livsey and K.Mullins	Develop and Implement a Program of Waterway Maintenance and Restoration	Design and approval for removal of two hundred and fifty feet of fieldstone culvert and replace with a restored stream channel.	Construction of stream restoration project is set for August 2015 pending successful bidding process.

Part IV. Summary of Information Collected and Analyzed

The Town of Lexington received a draft Oil Spill Prevention Control and Countermeasures (SPCC) and draft Stormwater Pollution Prevention Plan (SWPPP) for the Samuel Hadley Public Service Building from the Town's environmental consultant. These documents are based on field observations and meeting with Town staff. Comments will be sent to the consultant and the needed revisions will be made for the plans implantation.

Volunteers monitored outfalls. Ecoli and elevated ammonia levels were present in the samples but in no consistent pattern. This year the town will continue to sample and screen results with the goal of locating and eliminating sources of contaminants in the Lexington's streams. The addition of an YSI meter has allowed the Town to begin to evaluate the steam health for dissolved oxygen, temperature and specific conductivity. The addition of a colorimeter has shown no detectable chlorine at the Town's outfalls that have been sampled in the limited number of samples taken from January 2015 to March 2015.

Because of the level of activity, the town assembled and stocked extra sampling kits. The extra kits were put into use, improving the effectiveness of volunteers working on outfall monitoring and screening.

Town staff sustained an emphasis on the quality of Mill Brook and its tributaries. Extensive relining of old sanitary sewers was completed during this permit year. Outfall sampling was done to measure the effect of relining. Six sampling days results showed Ecoli with a geometric mean of 2,338.35 MPN/100 ml. One sampling day assayed 24,196.00 MPN/100 ml.

The appearance of the sudden high spike suggest that we have an illicit connecting near this location. We will be investigating further.