

**Municipality/Organization:** Town of Milford, MA

**Permit Number:** MAR041135

**Annual Report Number  
& Reporting Period:** No. 11: March 13-March 14

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

### **Part I. General Information**

**Contact Person:** Scott Crisafulli

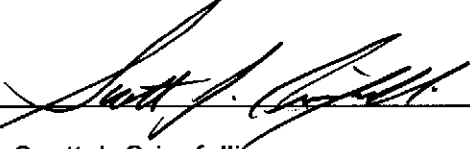
**Title:** Highway Surveyor

**Telephone #:** 508-473-1274

**Email:** Highway@MilfordMa.com

#### **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:** Scott J. Crisafulli

**Title:** Highway Surveyor

**Date:** April 22, 2014

**Municipality/Organization:**      **Town of Milford, MA**

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Signature: \_\_\_\_\_

Printed Name: \_\_\_\_\_

Title: \_\_\_\_\_

Date: \_\_\_\_\_

## **Part II. Self-Assessment**

The Town of Milford has completed the required self-assessment and has determined that our municipality is in compliance with the permit conditions. Discussions of the progress on BMPs toward the measurable goals, as well as quantification of some of the programs, are included in the following sections. This Annual Report is based on the current General Permit being administratively continued, as it expired on May 1, 2008 and a new General Permit had not been issued at the time of preparation of this report. Any reference to planned activities in the coming year (“Year 12”) is based on the assumption that the Town of Milford will continue to conduct activities to comply with the current Permit conditions until a new Permit takes effect. If a new Permit takes effect within the coming year (May 1, 2014 – May 1, 2015), the Town of Milford may revise the planned activities for “Year 12”, in accordance with the new Permit.

### Public Education and Outreach

Milford has met the goals of the BMPs in this category and will continue to provide public education in the form of presentations, expansion of collection of stormwater materials in the local library and other Town venues (schools, Town Hall), and postings on the Town website. During this permit year, a presentation was given by GZA GeoEnvironmental, Inc. to 5<sup>th</sup>, 6<sup>th</sup>, and 7<sup>th</sup> grade students at Stacy Middle School for their Science Club meeting on December 2, 2013. The presentation included general stormwater education, with a focus on surface water quality parameters and testing. Stormwater education materials were provided to the Town for distribution to 6 Milford Schools, as well as the Town Library, Wastewater Treatment Plant, Milford Water Co., and Town Hall. Electronic files of these materials will be provided to the Town of Milford Chief Technology Officer for posting on the Town’s web site. During Permit Year 12, public education will continue to focus on sources of bacteria and phosphorus in the watershed, as well as groundwater recharge.

### Public Involvement and Participation

Annual clean-ups, scrap metal and used motor oil recycling, and semi-annual hazardous waste pickup days are ongoing programs to fulfill this component. In addition, the Highway Department worked with the Eagle Scouts to stencil 3,353 catch basins with a stormwater message stating “Drains to Charles River, DON’T DUMP”. The Town also orchestrated Earth Day and Bike Trail Cleanup events on April 20, 2013.

### Illicit Discharge Detection and Elimination (IDDE)

The Sewer Department continued to investigate the drainage system connected to an outfall along Main Street which exhibited elevated enterococcus levels during previous outfall screening. In the previous permit year, the Sewer Department used smoke testing

and detected an illegal connection at 130 Main Street, which was subsequently removed by changing some internal plumbing within the building. The Sewer Department re-tested after removal of the illegal connection at 130 Main Street and found evidence that one or more potential illicit discharges remain. The Sewer Department investigated every facility in all rooms of the Thom Building at 89 Main Street and did not detect any illicit discharges there. In this permit year, the Sewer Department dye tested all of the fixtures in the buildings located at 89 Main Street, 90 Main Street, 91 Main Street, and 100 Main Street. Additionally, one fixture at the back apartment of 94 Main Street was dye tested. No illicit discharges were found. The Milford Sewer Department regularly conducts several programs to address existing and potential sanitary sewer overflows (SSOs). These include annual and monthly flushing of specific areas within the sewer collection system in an effort to reduce the frequency, duration and volumes of SSOs that could potentially occur, an infiltration/inflow removal program, and a sump pump removal program. Forty-six (46) sump pumps were disconnected in 2013 and connected to the municipal stormwater system or a dry well. There was one SSO which occurred during calendar year 2013 within the Town of Milford's sewer collection system, which was due to a force main break that was subsequently repaired. During calendar year 2013, the Sewer Department also cleaned and performed closed circuit television (CCTV) inspections of approximately 7,800 linear feet of sewer main, and performed chemical grouting of 1,400 joints and 70 service connections.

The Town did not conduct any additional stormwater structure mapping in the past year. However, MassOrtho was contracted to conduct a flyover of the Town. The Town also contracted AppGeo to conduct an assessment of the Town's GIS systems including drainage applications. Both items are scheduled for completion in Spring 2014. The flyover and GIS assessment will enhance the Town's future stormwater mapping efforts.

#### Construction Site Stormwater Runoff Control, Post-Construction Stormwater Management in New Development and Redevelopment

All developments that met the criteria to require a Town stormwater permit were also required to file a Notice of Intent with the Conservation Commission; thus, these projects were exempt from the Town Stormwater Bylaw because they were required to meet the Town's Stormwater Management provisions to obtain the Order of Conditions. During this Permit Year, there were seven Notices of Intent filed with the Milford Conservation Commission and all seven were issued Orders of Conditions. One Certificate of Compliance was issued for an Order issued in 2013. Three (3) of the projects were subject to the Town's Stormwater Management provisions and submitted Operation and Maintenance Plans which are now on file in the Town of Milford's Office of Planning and Engineering. Two primary stormwater BMPs and several smaller BMPs were constructed and approved in association with three (3) projects. The table below summarizes information on these projects and BMPs. There were no reported violations of the Stormwater By-law.

**Projects with BMPs Subject to Town's Stormwater Management Requirements**

| <b>Location</b>   | <b>DEP #</b> | <b>Date</b> | <b>Detail</b>         | <b>BMP(s)</b>                                          |
|-------------------|--------------|-------------|-----------------------|--------------------------------------------------------|
| East Main Street  | 223-1047     | 05/16/13    | #340                  | Deep sump CBs, Stormceptors, subgrade leaching system  |
| Dilla Street      | 223-1055     | 12/13/13    | #53                   | Deep sump CBs, Stormceptors, water quality swale       |
| Fortune Boulevard | 223-1056     | 01/07/14    | Parking for Evergreen | Deep sump CBs, Stormceptors (existing detention ponds) |

Additionally, BMPs associated with NOIs filed in the previous permit year were approved in PY11 for four different projects. Three of these projects were related to parking at Milford Regional Medical Center. The remaining project was at the South Central Estates on Roland Drive. All four projects incorporated catch basins and detention basins.

Pollution Prevention and Good Housekeeping in Municipal Operations

The Town installed four new catch basins along with 795 feet of new drainage in 2013, and rebuilt a total of 21 town-maintained catch basins. Shallow catch basins in the area of Draper Park/Church Street/Bancroft Street were replaced with deep sump catch basins with hoods. An additional twelve new catch basins and five drainage manholes were installed in the vicinity of the park. Furthermore, 84 culvert cleanouts were conducted along Godfrey Brook, Hospital Brook, Ivy Brook, and O'Brien Brook.

The Town worked with the US Army Corps of Engineers (USACE) to finalize the design of the Milford Pond Aquatic Restoration Project. The project involves the dredging of 19 acres of Milford Pond to a depth of 12-feet and the use of the dredging spoils to create emergent wetlands and islands across 25 acres of the pond. The project will create deep water habitat for fish, provide additional marsh habitat for 4 endangered species of birds, and provide improved recreational value to the Town of Milford. The dredged area will eliminate existing invasive species in those areas, and the replicated wetlands will increase nutrient uptake in the pond (i.e., phosphorous removal). The project is scheduled to be bid in the summer of 2014.

The Town continues to work on a phased project to rehabilitate the stone masonry channelized sections of the Godfrey and O'Brien Brooks stream channels. Frequent damage to the aged stone walls results from high flows and contributes to periodic episodes of sediment loading from erosion. The Town is working with FEMA to get a grant to fund a portion of this project, including the repair of a portion of Godfrey Brook that crosses Rt. 16 by the Hospital. The design of the project is nearly complete and once funding is

secured it will be put out to bid.

The Town Parks Department has a landscape management plan that oversees the seed, fertilizer, herbicide, and pesticide application at ten town-owned park facilities. Typically, each of the field facilities receives three applications of seed, fertilizer, herbicide, and pesticide on an annual basis. Additionally, all landscape waste generated by the Parks Department is brought to a town compost facility for disposal. Trash from park trash barrels is emptied at least twice per week and brought to dumpsters, which are emptied once per week. The Parks Department also maintains five pet stations with signage along the Charles River Bicycle Trail in an effort to eliminate pet waste pollution. The town pool is dechlorinated and discharged to the stormwater system three times per year.

### 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 11<br>(Reliance on non-municipal partners indicated, if any)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Planned Activities – Permit Year 12                                                              |
|----------|-----------------------------------------------------------------------------------------------------------------------|-------------------------------|--------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------|
| PE1      | Brochures to educate public about stormwater pollution, pollution prevention, importance of reporting illicit dumping | Highway Dept.                 | Develop brochures in Permit Year (PY) 1. Produce and mail to residents in PY2. | Brochures distributed during PY2.<br>Approximate volume of material removed from catch basins:<br>PY2: 2,400 cubic yards (1598 tons of road sand were purchased by the Town during the previous winter season)<br>PY3: 2,460 cubic yards (2710 tons of road sand were purchased by the Town during the previous winter season)<br>PY4: 3,600 cubic yards (1185 tons of road sand were purchased by the Town during the previous winter season)<br>PY5: 4,500 cubic yards<br>PY6: 342 tons (catch basin and sweepings combined)<br>PY7: 1,600 cubic yards (catch basin and sweepings combined)<br>PY8: 1,515 cubic yards<br>PY9: 1,159 tons catch basin cleanings + 1,719 cubic yards street sweepings<br>PY10: 557 tons catch basin cleanings + 659 cubic yards street sweepings<br>PY11: 557 tons catch basin cleanings + 771 cubic yards street sweepings | Monitor goal of reduction in pollutants in catch basins, observed by catch basin cleaning crews. |
| Revised  |                                                                                                                       |                               |                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                  |

## 1. Public Education and Outreach cont'd.

| BMP ID # | BMP Description                                                                                                                        | Responsible Dept./Person Name | Measurable Goal(s)                                                                            | Progress on Goal(s) – Permit Year 11<br>(Reliance on non-municipal partners indicated, if any)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Planned Activities – Permit Year 12                                                                            |
|----------|----------------------------------------------------------------------------------------------------------------------------------------|-------------------------------|-----------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------|
| PE2      | Brochures to educate business/industry regarding pollution prevention, material storage and handling, housekeeping, disposal practices | Highway Dept.                 | Develop brochure in PY1. Produce and mail to businesses in PY2.                               | Brochures distributed during PY2.<br>Approximate volume of material removed from catch basins:<br>PY2: 2,400 cubic yards (1598 tons of road sand were purchased by the Town during the previous winter season)<br>PY3: 2,460 cubic yards (2710 tons of road sand were purchased by the Town during the previous winter season)<br>PY4: 3,600 cubic yards (1185 tons of road sand were purchased by the Town during the previous winter season)<br>PY5: 4,500 cubic yards<br>PY6: 342 tons (catch basin and sweepings combined)<br>PY7: 1,600 cubic yards (catch basin and sweepings combined)<br>PY8: 1,515 cubic yards<br>PY9: 1,159 tons catch basin cleanings + 1,719 cubic yards street sweepings<br>PY10: 557 tons catch basin cleanings + 659 cubic yards street sweepings<br>PY11: 557 tons catch basin cleanings + 771 cubic yards street sweepings | Monitor goal of reduction in pollutants in catch basins, observed by catch basin cleaning crews.               |
| Revised  |                                                                                                                                        |                               |                                                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                |
| PE3      | Outreach program for local students, civic groups                                                                                      | Highway Dept.                 | Organize and implement round of presentations for local schools and at least one civic group. | Consultant performed stormwater education PowerPoint presentation for 5 <sup>th</sup> , 6 <sup>th</sup> , and 7 <sup>th</sup> graders at Stacy Middle School (approximately 50 students) on December 2, 2013.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Continue education campaign about bacterial and phosphorus source issues. Include one (1) public presentation. |
| Revised  |                                                                                                                                        |                               |                                                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                |

# 1. Public Education and Outreach cont'd.

| BMP ID # | BMP Description                                               | Responsible Dept./Person Name | Measurable Goal(s)                                                                          | Progress on Goal(s) – Permit Year 11<br>(Reliance on non-municipal partners indicated, if any)                                                                                                                                                                                                                                                                                                                                              | Planned Activities – Permit Year 12                                                 |
|----------|---------------------------------------------------------------|-------------------------------|---------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------|
| PE4      | Educational material in library                               | Highway Dept.                 | Organize a group of materials regarding stormwater pollution and make available at library. | Poster “Save Water: Install a Rain Barrel” designed by consultant: Materials distributed to 6 Milford Schools, as well as Town Library, Wastewater Treatment Plant, Milford Water Co., and Town Hall in March, 2014. Electronic files of these materials provided to the Town of Milford Chief Technology Officer in March, 2014 for posting on the Town’s web site. In general, the web site receives approximately 11,000 hits per month. | Add to and update collection of materials, with a focus on bacteria and phosphorus. |
| Revised  | <i>Educational materials in Town Hall and other locations</i> | Highway Dept.                 | Hang posters and have materials available in Town Hall.                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                     |

## 2. Public Involvement and Participation

| BMP ID # | BMP Description   | Responsible Dept./Person Name | Measurable Goal(s)                                                                 | Progress on Goal(s) – Permit Year 11<br>(Reliance on non-municipal partners indicated, if any)                                                                                                                                                                                                                                                                                                                                                                                                                      | Planned Activities – Permit Year 12                                                         |
|----------|-------------------|-------------------------------|------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------|
| PP1      | Community cleanup | Highway Dept.                 | Form volunteer group for annual cleanup. Hold cleanup day and record participants. | Cleanups conducted May 28-31 and September 10-13 by inmate community service group to pick up litter along roadsides and culverts throughout town. Six to nine inmates per day conducted work on each occasion.                                                                                                                                                                                                                                                                                                     | Continue annual cleanup days to reduce amount of debris/trash along waterways and roadways. |
| Revised  |                   |                               |                                                                                    | <p>The Charles River Earth Day Cleanup Steering Committee held its 14<sup>th</sup> Annual Earth Day Charles River Watershed Cleanup Event on April 20, 2013. This event involved volunteers collecting trash throughout the Charles River watershed, including sites within Milford.</p> <p>The Friends of the Milford Upper Charles Trail held an Earth Day cleanup on April 20, 2013, along the bike trail which runs adjacent to Louisa Lake and Milford Pond within the Charles River watershed in Milford.</p> |                                                                                             |

## 2. Public Involvement and Participation cont'd.

| <b>BMP ID #</b> | <b>BMP Description</b>                   | <b>Responsible Dept./Person Name</b> | <b>Measurable Goal(s)</b>                                                 | <b>Progress on Goal(s) – Permit Year 11<br/>(Reliance on non-municipal partners indicated, if any)</b>                                                                                                                                                                                                                                                                                                                                                                                              | <b>Planned Activities – Permit Year 12</b>                           |
|-----------------|------------------------------------------|--------------------------------------|---------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------|
| PP2             | Scrap metal and used motor oil recycling | Highway Dept.                        | Continue to offer recycling program. Record amount of material collected. | Program is ongoing and maintained by the Board of Health. Waste/used engine oil, latex/oil based paint, auto batteries, and household batteries are collected year round. One (1) comprehensive household hazardous waste collection day was hosted by the Town of Milford for the collection of anti-freeze and used oil filters. 2,262 tons of basic recycled materials and 4,533 tons of other recycled materials recycled in Calendar Year 2013, including 673 tons of scrap metal/white goods. | Continue to offer program and record amounts of materials collected. |

## 2. Public Involvement and Participation cont'd.

| BMP ID #                           | BMP Description              | Responsible Dept./Person Name | Measurable Goal(s)                                                                     | Progress on Goal(s) – Permit Year 11<br>(Reliance on non-municipal partners indicated, if any)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Planned Activities – Permit Year 12 |         |         |         |         |         |         |                |     |     |     |     |     |     |                                    |   |    |   |   |   |   |                           |     |     |     |     |     |     |                            |    |    |    |    |    |    |                            |      |      |     |     |     |     |                 |      |      |      |      |      |      |               |     |     |     |     |     |     |                 |     |     |      |      |    |    |                                                                             |
|------------------------------------|------------------------------|-------------------------------|----------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------|---------|---------|---------|---------|---------|---------|----------------|-----|-----|-----|-----|-----|-----|------------------------------------|---|----|---|---|---|---|---------------------------|-----|-----|-----|-----|-----|-----|----------------------------|----|----|----|----|----|----|----------------------------|------|------|-----|-----|-----|-----|-----------------|------|------|------|------|------|------|---------------|-----|-----|-----|-----|-----|-----|-----------------|-----|-----|------|------|----|----|-----------------------------------------------------------------------------|
| PP3                                | Hazardous waste dropoff days | Highway Dept.                 | Continue to offer semi-annual dropoff program and record amount of material collected. | <div>Program is ongoing and maintained by the Board of Health.</div> <table><tr><td>Item</td><td>CY 2004</td><td>CY 2005</td><td>CY 2006</td><td>CY 2007</td><td>CY 2008</td><td>CY 2009</td></tr><tr><td>Auto batteries</td><td>388</td><td>409</td><td>367</td><td>309</td><td>327</td><td>310</td></tr><tr><td>5-gal pails of household batteries</td><td>6</td><td>25</td><td>5</td><td>5</td><td>5</td><td>6</td></tr><tr><td>l.f. of fluorescent bulbs</td><td>315</td><td>285</td><td>375</td><td>355</td><td>347</td><td>347</td></tr><tr><td>C.Y. latex/oil based paint</td><td>15</td><td>18</td><td>15</td><td>15</td><td>15</td><td>18</td></tr><tr><td>Mercury containing devices</td><td>1524</td><td>1497</td><td>505</td><td>466</td><td>371</td><td>371</td></tr><tr><td>lbs electronics</td><td>4100</td><td>3779</td><td>4670</td><td>5430</td><td>5742</td><td>5530</td></tr><tr><td>Propane Tanks</td><td>N/A</td><td>N/A</td><td>388</td><td>325</td><td>385</td><td>391</td></tr><tr><td>Tons Auto Tires</td><td>N/A</td><td>N/A</td><td>2150</td><td>2120</td><td>22</td><td>19</td></tr></table> <div>In 2013, all materials listed above were collected year round. One comprehensive hazardous product one-day collection event was held by the Town. The only amount reported was 1,450 tons of E-waste. . Town residents also had access to two (2) additional comprehensive household hazardous waste collection events in Hopedale and Holliston.</div> | Item                                | CY 2004 | CY 2005 | CY 2006 | CY 2007 | CY 2008 | CY 2009 | Auto batteries | 388 | 409 | 367 | 309 | 327 | 310 | 5-gal pails of household batteries | 6 | 25 | 5 | 5 | 5 | 6 | l.f. of fluorescent bulbs | 315 | 285 | 375 | 355 | 347 | 347 | C.Y. latex/oil based paint | 15 | 18 | 15 | 15 | 15 | 18 | Mercury containing devices | 1524 | 1497 | 505 | 466 | 371 | 371 | lbs electronics | 4100 | 3779 | 4670 | 5430 | 5742 | 5530 | Propane Tanks | N/A | N/A | 388 | 325 | 385 | 391 | Tons Auto Tires | N/A | N/A | 2150 | 2120 | 22 | 19 | Continue to offer drop off program and record amount of material collected. |
| Item                               | CY 2004                      | CY 2005                       | CY 2006                                                                                | CY 2007                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | CY 2008                             | CY 2009 |         |         |         |         |         |                |     |     |     |     |     |     |                                    |   |    |   |   |   |   |                           |     |     |     |     |     |     |                            |    |    |    |    |    |    |                            |      |      |     |     |     |     |                 |      |      |      |      |      |      |               |     |     |     |     |     |     |                 |     |     |      |      |    |    |                                                                             |
| Auto batteries                     | 388                          | 409                           | 367                                                                                    | 309                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | 327                                 | 310     |         |         |         |         |         |                |     |     |     |     |     |     |                                    |   |    |   |   |   |   |                           |     |     |     |     |     |     |                            |    |    |    |    |    |    |                            |      |      |     |     |     |     |                 |      |      |      |      |      |      |               |     |     |     |     |     |     |                 |     |     |      |      |    |    |                                                                             |
| 5-gal pails of household batteries | 6                            | 25                            | 5                                                                                      | 5                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | 5                                   | 6       |         |         |         |         |         |                |     |     |     |     |     |     |                                    |   |    |   |   |   |   |                           |     |     |     |     |     |     |                            |    |    |    |    |    |    |                            |      |      |     |     |     |     |                 |      |      |      |      |      |      |               |     |     |     |     |     |     |                 |     |     |      |      |    |    |                                                                             |
| l.f. of fluorescent bulbs          | 315                          | 285                           | 375                                                                                    | 355                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | 347                                 | 347     |         |         |         |         |         |                |     |     |     |     |     |     |                                    |   |    |   |   |   |   |                           |     |     |     |     |     |     |                            |    |    |    |    |    |    |                            |      |      |     |     |     |     |                 |      |      |      |      |      |      |               |     |     |     |     |     |     |                 |     |     |      |      |    |    |                                                                             |
| C.Y. latex/oil based paint         | 15                           | 18                            | 15                                                                                     | 15                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | 15                                  | 18      |         |         |         |         |         |                |     |     |     |     |     |     |                                    |   |    |   |   |   |   |                           |     |     |     |     |     |     |                            |    |    |    |    |    |    |                            |      |      |     |     |     |     |                 |      |      |      |      |      |      |               |     |     |     |     |     |     |                 |     |     |      |      |    |    |                                                                             |
| Mercury containing devices         | 1524                         | 1497                          | 505                                                                                    | 466                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | 371                                 | 371     |         |         |         |         |         |                |     |     |     |     |     |     |                                    |   |    |   |   |   |   |                           |     |     |     |     |     |     |                            |    |    |    |    |    |    |                            |      |      |     |     |     |     |                 |      |      |      |      |      |      |               |     |     |     |     |     |     |                 |     |     |      |      |    |    |                                                                             |
| lbs electronics                    | 4100                         | 3779                          | 4670                                                                                   | 5430                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | 5742                                | 5530    |         |         |         |         |         |                |     |     |     |     |     |     |                                    |   |    |   |   |   |   |                           |     |     |     |     |     |     |                            |    |    |    |    |    |    |                            |      |      |     |     |     |     |                 |      |      |      |      |      |      |               |     |     |     |     |     |     |                 |     |     |      |      |    |    |                                                                             |
| Propane Tanks                      | N/A                          | N/A                           | 388                                                                                    | 325                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | 385                                 | 391     |         |         |         |         |         |                |     |     |     |     |     |     |                                    |   |    |   |   |   |   |                           |     |     |     |     |     |     |                            |    |    |    |    |    |    |                            |      |      |     |     |     |     |                 |      |      |      |      |      |      |               |     |     |     |     |     |     |                 |     |     |      |      |    |    |                                                                             |
| Tons Auto Tires                    | N/A                          | N/A                           | 2150                                                                                   | 2120                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | 22                                  | 19      |         |         |         |         |         |                |     |     |     |     |     |     |                                    |   |    |   |   |   |   |                           |     |     |     |     |     |     |                            |    |    |    |    |    |    |                            |      |      |     |     |     |     |                 |      |      |      |      |      |      |               |     |     |     |     |     |     |                 |     |     |      |      |    |    |                                                                             |
| Revised                            |                              |                               |                                                                                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                     |         |         |         |         |         |         |                |     |     |     |     |     |     |                                    |   |    |   |   |   |   |                           |     |     |     |     |     |     |                            |    |    |    |    |    |    |                            |      |      |     |     |     |     |                 |      |      |      |      |      |      |               |     |     |     |     |     |     |                 |     |     |      |      |    |    |                                                                             |

## 2. Public Involvement and Participation cont'd.

| BMP ID # | BMP Description | Responsible Dept./Person Name | Measurable Goal(s)                                                                                        | Progress on Goal(s) – Permit Year 11<br>(Reliance on non-municipal partners indicated, if any) | Planned Activities – Permit Year 12 |
|----------|-----------------|-------------------------------|-----------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------|-------------------------------------|
| PP4      | Public meeting  | Highway Dept.                 | Hold public meeting to present proposed bylaw/ordinances for input prior to implementation by end of PY1. | Task completed in PY3.                                                                         | Task complete.                      |
| Revised  |                 |                               | Public meeting may also discuss stormwater pollution prevention.                                          |                                                                                                |                                     |

### 3. Illicit Discharge Detection and Elimination

| <b>BMP ID #</b> | <b>BMP Description</b>                                                           | <b>Responsible Dept./Person Name</b> | <b>Measurable Goal(s)</b>                                                                 | <b>Progress on Goal(s) – Permit Year 11</b><br>(Reliance on non-municipal partners indicated, if any)                                                                                                                                                                                                    | <b>Planned Activities – Permit Year 12</b>                                |
|-----------------|----------------------------------------------------------------------------------|--------------------------------------|-------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------|
| IDD1            | Storm Sewer Map                                                                  | Highway Dept.                        | Seek Town Meeting funding in PY1.<br>Complete map in PY2.                                 | Outfall mapping completed by consultant August 2004, at cost of \$8,000. Additional storm sewer elements have been mapped in Project Years 4, 5, 6.                                                                                                                                                      | Task complete (all outfalls). Will update GIS and orthophoto information. |
| Revised         |                                                                                  |                                      |                                                                                           |                                                                                                                                                                                                                                                                                                          |                                                                           |
| IDD2            | IDDE program development, identification of problem areas, correction of issues. | Highway Dept.                        | Conduct outfall sampling in PY2. Number of illicit discharges to be removed in PY3, 4, 5. | Dry-weather field screening completed by consultant Fall of 2005 and “Dry Weather Outfall Investigation Summary Report” completed November 2005. 303 outfalls/structures were inspected at least once during dry weather.<br><br>No illicit discharges found (SEE PART II. SELF ASSESSMENT FOR DETAILS). | Continue IDDE program.                                                    |
| Revised         |                                                                                  |                                      |                                                                                           |                                                                                                                                                                                                                                                                                                          |                                                                           |
| IDD3            | IDDE program documentation.                                                      | Highway Dept.                        | Submit annual report, including information on IDDE program steps.                        | Annual report is hereby submitted.                                                                                                                                                                                                                                                                       | Future PY annual reports will include information on IDDE program tasks.  |
| Revised         |                                                                                  |                                      |                                                                                           |                                                                                                                                                                                                                                                                                                          |                                                                           |

### 3. Illicit Discharge Detection and Elimination cont'd.

| BMP ID # | BMP Description                                                                                                                              | Responsible Dept./Person Name | Measurable Goal(s)                                                                                                                          | Progress on Goal(s) – Permit Year 11<br>(Reliance on non-municipal partners indicated, if any)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Planned Activities – Permit Year 12                                                |
|----------|----------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------|
| IDD4     | Storm drain stenciling program, focusing on drains tributary to ponds and known dumping areas. Program extended to brook drains as feasible. | Highway Dept.                 | Percentage/number of storm drains stenciled annually. Records of catch basin cleaning showing decreased dumping/pollutants in catch basins. | All Town storm drains (approximately 3,353) were stenciled or restenciled in PY11. The Eagle Scouts assisted with the stenciling.<br>Approximate volume of material removed from catch basins:<br>PY3: 2,460 cubic yards (2710 tons of road sand were purchased by the Town during the previous winter season)<br>PY4: 3,600 cubic yards (1185 tons of road sand were purchased by the Town during the previous winter season)<br>PY5: 4,500 cubic yards<br>PY6: 342 tons<br>PY7: 1,600 cubic yards (catch basin and sweepings combined)<br>PY8: 1,515 cubic yards<br>PY9: 1,159 tons catch basin cleanings + 1,719 cubic yards street sweepings<br>PY10: 557 tons catch basin cleanings + 659 cubic yards street sweepings<br>PY11: 557 tons catch basin cleanings + 771 cubic yards street sweepings | Task complete.                                                                     |
| Revised  |                                                                                                                                              |                               |                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                    |
| IDD5     | Regulation prohibiting non-stormwater discharges to municipal system.                                                                        | Highway Dept.                 | Development and implementation of regulation during PY2.                                                                                    | Sections on Prohibition of Illegal Discharges, Prohibition of Illicit Connections, and Waste Disposal Prohibitions included in Stormwater Management bylaw, in effect as of February 9, 2006.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Implement bylaw. Work with property owners to remove illicit discharges as needed. |
| Revised  |                                                                                                                                              |                               |                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                    |

#### 4. Construction Site Stormwater Runoff Control

| BMP ID # | BMP Description                                                       | Responsible Dept./Person Name | Measurable Goal(s)                                                 | Progress on Goal(s) – Permit Year 11<br>(Reliance on non-municipal partners indicated, if any)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Planned Activities – Permit Year 12 |
|----------|-----------------------------------------------------------------------|-------------------------------|--------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------|
| CR1      | Regulation for erosion/sediment controls, BMPs, construction controls | Highway Dept.                 | Development and establishment of regulation.                       | Stormwater Management bylaw requiring stormwater management permit for construction activities disturbing greater than 1 acre approved at Town Meeting on October 24, 2005. The Stormwater Management bylaw was approved by the Attorney General's Office in letter dated February 9, 2006.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Task complete.                      |
| Revised  |                                                                       |                               |                                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                     |
| CR2      | Mechanism for site plan review, inspections, review procedures        | Highway Dept.                 | Establishment of procedures and number of plans reviewed annually. | The Stormwater Management General By-Law, adopted on October 24, 2005, requires a Stormwater Permit for any construction activity disturbing greater than 1 acre of land except for projects that are required to file a Notice of Intent (NOI) with the Milford Conservation Commission. Such NOIs must include a fully executed Stormwater Management Form and projects must be designed in full compliance with DEP's Stormwater Management Policy. During this Permit Year, there were seven Notices of Intent filed with the Milford Conservation Commission and all seven were issued Orders of Conditions. One Certificate of Compliance was issued for a project. Additionally, one Enforcement Order was issued. Three (3) of the projects were subject to the Town's Stormwater Management provisions and submitted Operation and Maintenance Plans which are now on file in the Town of Milford's Office of Planning and Engineering. A total of two primary stormwater BMPs were constructed in association with the three (3) projects. Multiple other BMPs including deep sump catch basins and Stormceptor units were installed, as well. There were no reported violations of the Stormwater By-law. | Implement bylaw.                    |
| Revised  |                                                                       |                               |                                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                     |

## 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 11<br>(Reliance on non-municipal partners indicated, if any)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Planned Activities – Permit Year 12 |
|----------|--------------------------------------------------------------|-------------------------------|----------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------|
| PCR1     | Regulation for BMPs                                          | Highway Dept.                 | Develop and adopt regulation, measure compliance (# of BMPs, % compliance, etc). | Two primary BMPs constructed in association with 2 projects. There were no reported violations of the Stormwater Management By-Law associated with BMP requirements.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Continue to implement bylaw.        |
| Revised  |                                                              |                               |                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                     |
| PCR2     | Regulatory mechanism for BMP operation and maintenance (O&M) | Highway Dept.                 | Regulation development and adoption; maintenance of inspection reports.          | Stormwater Management bylaw approved at Town Meeting on October 24, 2005 includes Operation, Maintenance, and Inspection Schedule requirements for privately-owned facilities, and assigns maintenance responsibility. The Stormwater Management bylaw was approved by the Attorney General's Office in letter dated February 9, 2006. During this Permit Year, there were seven Notices of Intent filed with the Milford Conservation Commission and all seven were issued Orders of Conditions. One Certificate of Compliance was issued for a project. Additionally, one Enforcement Order was issued. Three (3) of the projects were subject to the Town's Stormwater Management provisions and submitted Operation and Maintenance Plans which are now on file in the Town of Milford's Office of Planning and Engineering. A total of two primary stormwater BMPs were constructed in association with three (3) projects. There were no reported violations of the Stormwater By-law. | Continue to implement bylaw.        |
| Revised  |                                                              |                               |                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                     |

## 6. Pollution Prevention and Good Housekeeping in Municipal Operations

| <b>BMP ID #</b> | <b>BMP Description</b>                 | <b>Responsible Dept./Person Name</b> | <b>Measurable Goal(s)</b>                                                                                        | <b>Progress on Goal(s) – Permit Year 11</b><br>(Reliance on non-municipal partners indicated, if any)                                                                                                                                                                                                                                                   | <b>Planned Activities – Permit Year 12</b>                 |
|-----------------|----------------------------------------|--------------------------------------|------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------|
| MGH1            | Street sweeping                        | Highway Dept.                        | Continue street sweeping program, note reduction in sediments in catch basins, quantities of material collected. | Street sweeping conducted March 14 through September 6 of 2013: 771 cubic yards collected. All accepted streets (120 miles) were swept twice, while main roads were swept multiple times.                                                                                                                                                               | Continue program through all permit years.                 |
| Revised         |                                        |                                      |                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                         |                                                            |
| MGH2            | Catch basin cleanouts                  | Highway Dept.                        | Continue catch basin cleanout program. Record number of catch basins cleaned, sediment collected.                | The Town conducted annual catch basin cleanouts in July through August of 2013 using an outside contractor. 3353 catch basins were cleaned and a total of 557 tons of material removed. Total cost of \$40,000 plus debris removal cost of \$24,000.                                                                                                    | Continue program through all permit years.                 |
| Revised         |                                        |                                      |                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                         |                                                            |
| MGH3            | Record keeping/schedule of maintenance | Highway Dept.                        | Continue to keep listing of regular maintenance activities, schedules, and procedures.                           | Records added to maintenance file.                                                                                                                                                                                                                                                                                                                      | Continue to maintain records and update program as needed. |
| Revised         |                                        |                                      |                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                         |                                                            |
| MGH4            | Recycling and waste disposal program   | Highway Dept.                        | Continue recycling and waste disposal program for municipal operations. Record quantities involved in program.   | Program ongoing. 7,524 cubic yds of mulched lawn waste collected in Fall of 2013 from 120 miles of Town streets at cost of \$39,000 for labor and fuel. The Town composted the collected leaves. The Boy Scouts collected Christmas trees (310 trees in total) and yard debris. Parks department landscape waste is composted at town compost facility. | Continue program through all permit years.                 |
| Revised         |                                        |                                      |                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                         |                                                            |

## 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 11<br>(Reliance on non-municipal partners indicated, if any)                                                                                                                                                                                                                                  | Planned Activities – Permit Year 12                                               |
|----------|------------------------------------------------------------|-------------------------------|----------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------|
| MGH 5    | Waste disposal/housekeeping training and practices         | Highway Dept.                 | Continue proper disposal procedures, conduct training, keep logs of material disposal. | 1,711 gallons of oil/water were removed from two oil/water separators at the Highway Department Garage in April and November of 2013 at a total cost of \$16,366.<br><br>GZA GeoEnvironmental, Inc. conducted Good Housekeeping, Construction Practices Training to approximately 13 highway department employees on 3/27/2014. | Continue program through all permit years.                                        |
| Revised  |                                                            |                               |                                                                                        |                                                                                                                                                                                                                                                                                                                                 |                                                                                   |
| MGH 6    | Identification, inspection, maintenance of Town owned BMPs | Highway Dept.                 | Inspection and maintenance of structures, maintain records.                            | <ul style="list-style-type: none"> <li>• 795 feet of new drainage was installed</li> <li>• 4 new catch basins were installed</li> <li>• 21 catch basins were rebuilt</li> <li>• 97 catch basins and manholes were repaired</li> <li>• minor brook repairs and brush clearing at various culverts</li> </ul>                     | Perform recommended maintenance activities on detention basins. Continue program. |
| Revised  |                                                            |                               |                                                                                        |                                                                                                                                                                                                                                                                                                                                 |                                                                                   |

#### Part IV. Summary of Information Collected and Analyzed

The quantities of materials accepted by the Town's recycling programs are recorded by the Board of Health and have been included in the following section.

#### Part V. Program Outputs & Accomplishments

##### Education, Involvement, and Training

|                                                                   |        |              |
|-------------------------------------------------------------------|--------|--------------|
| Stormwater education materials collected and available at library | (y/n)  | YES          |
| Clean-up days held                                                | (#)    | 2 events     |
| Household Hazardous Waste Recycling                               |        |              |
| ▪ material collected (automotive waste oil)                       | (gal)  | Not reported |
| ▪ material collected (household paint)                            | (gal)  | Not reported |
| ▪ annual recycling (January 2013- December 2013 (inclusive))      | (tons) | 6795         |

##### Legal/Regulatory

|                                                    | In Place<br>Prior to<br>Phase II | Existing Regs<br>Reviewed | Drafted | Adopted |
|----------------------------------------------------|----------------------------------|---------------------------|---------|---------|
| Regulatory Mechanism Status (indicate with "X")    |                                  |                           |         |         |
| ▪ Illicit Discharge Detection & Elimination        |                                  |                           |         | X       |
| ▪ Erosion & Sediment Control                       |                                  |                           |         | X       |
| ▪ Post-Development Stormwater Management           |                                  |                           |         | X       |
| Accompanying Regulation Status (indicate with "X") |                                  |                           |         |         |
| ▪ Illicit Discharge Detection & Elimination        |                                  |                           |         | X       |
| ▪ Erosion & Sediment Control                       | X (partly)                       |                           |         | X       |
| ▪ Post-Development Stormwater Management           |                                  |                           |         | X       |

## Mapping and Illicit Discharges

|                                                       |      |                 |
|-------------------------------------------------------|------|-----------------|
| Number of outfalls mapped to date                     | (#)  | 281             |
| Estimated or actual number of outfalls                | (#)  | 282             |
| Mapping/Survey method(s)                              | type | GPS and CAD/GIS |
| Outfalls inspected/screened during dry weather        | (#)  | 282 (100%)      |
| Estimated % of population on sewer                    | (%)  | 80              |
| Estimated % of population on septic systems           | (%)  | 20              |
| Outfalls identified for further investigation         | (#)  | 24 (9%)         |
| Outfall drainage systems mapped (complete or partial) | (#)  | 25 (9%)         |
| Illicit discharges traced                             | (#)  | 8               |
| Illicit discharges removed                            | (#)  | 7               |

## 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                                                                 |
| Total number of structures cleaned                                                             | (#)           | 3353                                                              |
| Total amount of material removed from structures                                               | (cubic yards) | 557 tons catch basin cleanings + 771 cubic yards street sweepings |
| Disposal or use of sweepings (landfill, POTW, compost, recycle for sand, beneficial use, etc.) |               | registered landfill                                               |
| Disposal of yard waste                                                                         |               | Composted and used by Public, Parks, and Highway Dept.            |
| Average frequency of street sweeping (non-commercial/non-arterial streets)                     | (times/yr)    | 2                                                                 |

|                                                                                      |            |                                    |
|--------------------------------------------------------------------------------------|------------|------------------------------------|
| Average frequency of street sweeping (commercial/arterial or other critical streets) | (times/yr) | At least 2                         |
| Disposal of sweepings (landfill, POTW, compost, beneficial use, etc.)                | (location) | registered landfill                |
| Anti-/De-Icing products                                                              | material   | NaCl and limited CaCl <sub>2</sub> |
| Salt pile(s) covered in storage shed(s)                                              | (y/n)      | Yes                                |