

**Municipality/Organization:** Town of Oxford

**EPA NPDES Permit Number:** MAR041147

**MaDEP Transmittal Number:** W-041061

**Annual Report Number**

**& Reporting Period:** No. 10: March 12-March 13

## **NPDES PII Small MS4 General Permit Annual Report**

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

**Contact Person:** Sean M. Divoll, P.E.

**Title:** Director of Public Works

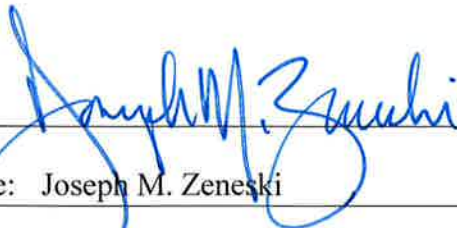
**Telephone #:** 508-987-6006

**Email:** sdivoll@town.oxford.ma.us

#### 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:** Joseph M. Zeneski

**Title:** Town Manager

**Date:**

29 April 2013

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

**The Town of Oxford has completed the required self assessment and has determined that our municipality is substantially in compliance with all permit conditions except for the following:**

**The Town of Oxford is working toward full compliance with all BMP's listed.**

## 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 10 (Reliance on non-municipal partners indicated, if any)                                                                                                                                    | Planned Activities – Next Permit Period                                               |
|---------------|------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------|---------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------|
| 1A<br>Revised | Develop Stormwater Section of Town Website                                                                             | Highway Department and Town Website Manager (s) | Measure number of hits annually.            | A Stormwater Website has been developed and is linked to the Town Website.                                                                                                                                                     | Continue to update the website as-needed.                                             |
| 1B<br>Revised | Develop and Broadcast Stormwater Presentation on Local Cable Network                                                   | Highway Department and Conservation Commission  | Cable TV tapes of shows.                    | No progress.                                                                                                                                                                                                                   | We do not have the equipment or personnel to complete this BMP.                       |
| 1C<br>Revised | Distribute Brochures and Fact Sheets to Businesses and Residents                                                       | Highway Department and Conservation Commission  | Number of articles and copies of materials. | Fact sheets and brochures were handed out at the Land Management Office window at Town Hall.                                                                                                                                   | Continue to hand out fact sheets and brochures.                                       |
| 1D<br>Revised | Develop Stormwater Management Video<br><br>Obtain a Stormwater Management Educational Video rather than create our own | Highway Department and Conservation Commission  | Number of rentals.                          | Two documentary videos have been obtained:<br>1.) “Liquid Assets” developed by the Pennsylvania State University<br>2.) “Reining in the Storm”, Massachusetts Edition, developed by the Northern Virginia Regional Commission. | Periodically broadcast the documentaries on the Oxford Cable Access channel.          |
| 1E<br>Revised | Develop a Poster Display Regarding Stormwater Issues                                                                   | Highway Department and Conservation Commission  | List of display locations.                  | Oxford Public Schools displayed posters at Earth Day celebrations.                                                                                                                                                             | Oxford Public Schools plan to continue displaying posters for Earth Day celebrations. |

1a. Additions

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## 2. Public Involvement and Participation

| BMP ID # | BMP Description                                    | Responsible Dept./Person Name                               | Measurable Goal(s)                                                                             | Progress on Goal(s) – Permit Year 10<br>(Reliance on non-municipal partners indicated, if any)                                                                           | Planned Activities – Next Permit Period                                                                                                                |
|----------|----------------------------------------------------|-------------------------------------------------------------|------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------|
| 2A       | Mark Storm Drains with Buttons or Stencils         | Highway Department, Conservation Commission, and Volunteers | 50% of the storm drains marked by year 5 with door hangers placed in associated neighborhoods. | 100% of catch basins were stenciled                                                                                                                                      | Oxford DPW plans to continue with the stenciling program in the next Permit Period                                                                     |
| Revised  |                                                    |                                                             |                                                                                                |                                                                                                                                                                          |                                                                                                                                                        |
| 2B       | Establish a Storm Water Telephone Hotline          | Highway Department and Town Website Manager (s)             | Record number of phone calls to hotline, copies of articles.                                   | Oxford DPW fielded six calls.                                                                                                                                            | Oxford DPW takes all stormwater calls on the main DPW phone number. Oxford DPW plans to continue taking stormwater calls on the main DPW phone number. |
| Revised  |                                                    |                                                             |                                                                                                |                                                                                                                                                                          |                                                                                                                                                        |
| 2C       | Conduct River, Stream, and Pond Cleanups           | Highway Department, Conservation Commission, and Volunteers | Cleaner streams as documented by before and after photographs.                                 | Several cleanup activities were conducted by volunteers on the French River and along Barbers Hollow Brook.                                                              | Continue to coordinate/encourage volunteer cleanup projects.                                                                                           |
| Revised  |                                                    |                                                             |                                                                                                |                                                                                                                                                                          |                                                                                                                                                        |
| 2D       | Establish a Native Tree and Shrub Planting Program | Highway Department, Conservation Commission, and Volunteers | Record the number, location and kind of tree or shrub planted.                                 | Oxford DPW continues to annually maintain the trees.                                                                                                                     | Oxford DPW will continue to work with local organizations to identify opportunities to continue planting native trees and shrubs in town.              |
| Revised  |                                                    |                                                             |                                                                                                |                                                                                                                                                                          |                                                                                                                                                        |
| 2E       | Establish a Classroom Education Program            | Conservation Commission                                     | Classroom education program implemented by year 5.                                             | An Educational Website has been developed and includes a Classroom Educational Program addressing stormwater management, water quality issues and monitoring activities. | Work with the School Department to incorporate the Educational Program into the school's curriculum.                                                   |
| Revised  |                                                    |                                                             |                                                                                                |                                                                                                                                                                          |                                                                                                                                                        |

| 2F | Prepare Press Releases | Highway Department and Conservation Commission | Copies of press articles. | No press releases were issued. | Press releases will be issued on an as-needed basis. |
|----|------------------------|------------------------------------------------|---------------------------|--------------------------------|------------------------------------------------------|
|    | Revised                |                                                |                           |                                |                                                      |

2a. Additions

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### 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 10</b><br>(Reliance on non-municipal partners indicated, if any)                                                                                                                                                           | <b>Planned Activities – Next Permit Period</b>                                                                                                             |
|-----------------|-----------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 3A              | Develop Town Storm Drain Outfall Map                                                    | Highway Department, Planner/Engineer, Outside Resources (possibly Worcester Polytech) | All outfalls mapped by year 5.                                                                                   | The DPW has completed mapping the entire storm drain system. The inventory has been incorporated into an integrated stormwater mapping and inspection system.                                                                                                   | Continue fine-tuning the GIS mapping system                                                                                                                |
| Revised         |                                                                                         |                                                                                       |                                                                                                                  |                                                                                                                                                                                                                                                                 |                                                                                                                                                            |
| 3B              | Develop Illicit Discharge Prohibition Ordinance                                         | Planning Board and Board of Health                                                    | Obtain authorization to control inputs to the municipal drainage system. Bylaw at Town meeting by end of year 2. | By-law already in place.                                                                                                                                                                                                                                        | Continue enforcement of by-law.                                                                                                                            |
| Revised         |                                                                                         |                                                                                       |                                                                                                                  |                                                                                                                                                                                                                                                                 |                                                                                                                                                            |
| 3C              | Develop Illicit Discharge Detection and Elimination Plan and Implement Activities       | Highway Department, Planning Board, and Board of Health                               | All outfalls examined by year 4. Sources traced and conclusion documented within one year of discovery.          | Illicit discharges have been noted. An Illicit Discharge Standard Operating Procedure has been developed to aid in detection and elimination.                                                                                                                   | Oxford DPW plans to follow up on all illicit connections in the following permit period                                                                    |
| Revised         |                                                                                         |                                                                                       |                                                                                                                  |                                                                                                                                                                                                                                                                 |                                                                                                                                                            |
| 3D              | Incorporate Information on Illicit Discharges into Public Education and Outreach Topics | DPW                                                                                   | Over 200 handouts entitled “Homeowner Tips for Cleaner Stormwater” were handed out                               | An Educational Website has been developed that addresses illicit discharge and includes a Resource Toolbox for homeowners. Illicit Discharge hand-outs have been made available at the Town Hall for the public and were handed out at Bulk Item Drop Off Days. | Oxford DPW plans to continue to update the website with additional information and resources. New informational brochures will be created and distributed. |
| Revised         |                                                                                         |                                                                                       |                                                                                                                  |                                                                                                                                                                                                                                                                 |                                                                                                                                                            |

|         |                                              |                                        |                                      |                                                                         |                                                        |
|---------|----------------------------------------------|----------------------------------------|--------------------------------------|-------------------------------------------------------------------------|--------------------------------------------------------|
| 3E      | Identify Department to Take Stormwater Calls | Highway Department and Board of Health | Log of complaints and actions taken. | Calls have been taken by each department. Coordination is working well. | Continue coordination effort among Oxford DPW and BOH. |
| Revised |                                              |                                        |                                      |                                                                         |                                                        |

3a. Additions

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#### 4. Construction Site Stormwater Runoff Control

| BMP ID # | BMP Description                              | Responsible Dept./Person Name                                | Measurable Goal(s)                                                 | Progress on Goal(s) – Permit Year 10<br>(Reliance on non-municipal partners indicated, if any) | Planned Activities – Next Permit Period                |
|----------|----------------------------------------------|--------------------------------------------------------------|--------------------------------------------------------------------|------------------------------------------------------------------------------------------------|--------------------------------------------------------|
| 4A       | Develop Erosion Control Regulation           | Planning Board, Board of Health, and Conservation Commission | Bylaw at Town meeting by end of year 3.                            | By-law already in place.                                                                       | Continue enforcement of by-law.                        |
| Revised  |                                              |                                                              |                                                                    |                                                                                                |                                                        |
| 4B       | Conduct Inspections for Erosion Controls     | Planning Board, Highway Department, and Consultant           | Inspection checklist and documented inspections.                   | Inspections have been completed.                                                               | Continue inspections.                                  |
| Revised  |                                              |                                                              |                                                                    |                                                                                                |                                                        |
| 4C       | Identify Department of Take Stormwater Calls | Planning Board and Highway Department                        | Record number of phone calls to hotline, copies of advertisements. | Calls have been taken by each department. Coordination is working well.                        | Continue coordination effort among Oxford DPW and BOH. |
| Revised  |                                              |                                                              |                                                                    |                                                                                                |                                                        |

#### 4a. Additions

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5. Post-Construction Stormwater Management in New Development and Redevelopment

| BMP ID # | BMP Description                          | Responsible Dept./Person Name                      | Measurable Goal(s)                                                                                         | Progress on Goal(s) – Permit Year 10 (Reliance on non-municipal partners indicated, if any) | Planned Activities – Next Permit Period |
|----------|------------------------------------------|----------------------------------------------------|------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------|-----------------------------------------|
| 5A       | Develop BMP Regulation                   | Planning Board and Selectmen                       | Bylaw at Town meeting by end of year 2.                                                                    | By-law already in place.                                                                    | Continue enforcement of by-law.         |
| Revised  |                                          |                                                    |                                                                                                            |                                                                                             |                                         |
| 5B       | Develop and Implement Inspection Program | Planning Board, Highway Department, and Consultant | Retain copies of maintenance reports received annually, plus records of inspections completed and results. | Inspection program on-going.                                                                | Continue inspection program.            |
| Revised  |                                          |                                                    |                                                                                                            |                                                                                             |                                         |

5a. Additions

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

| BMP ID #      | BMP Description                                                                              | Responsible Dept./Person Name     | Measurable Goal(s)                                                                      | Progress on Goal(s) – Permit Year 10<br>(Reliance on non-municipal partners indicated, if any)                                                | Planned Activities – Next Permit Period                                                      |
|---------------|----------------------------------------------------------------------------------------------|-----------------------------------|-----------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------|
| 6A<br>Revised | Clean Catch Basins                                                                           | Highway Department                | Clean all catch basins.                                                                 | 100% of all catch basins were cleaned                                                                                                         | Continue to clean 100% of all catch basins.                                                  |
| 6B<br>Revised | Sweep Streets in Town                                                                        | Highway Department                | Priority plan of sweeping based on water quality impact. Volume of sweepings collected. | 100% of streets swept                                                                                                                         | Continue to sweep 100% of all streets.                                                       |
| 6C<br>Revised | Develop an Inspection and Maintenance Plan                                                   | Highway Department                | Written schedule and records of inspections and maintenance.                            | Inspections and repair are noted in a log by the Operations Manager. An electronic inspection system has been developed using mobile devices. | Oxford DPW will continue with its inspection and maintenance plan in the next permit period. |
| 6D<br>Revised | Continue Existing Pollution Prevention and Good Housekeeping Practices at the Highway Garage | Highway Department                | Ensure existing practices are continued.                                                | Good Housekeeping on-going.                                                                                                                   | Continue on-going good housekeeping.                                                         |
| 6E<br>Revised | Evaluate Alternative Vehicle Washing Options at the Highway Garage                           | Highway Department and Consultant | New method for handling vehicle wash water at the site by the end of year 2.            | Request for a new DPW building feasibility study has been submitted to the Finance Committee for review. Funding remains a challenge.         | Meet with Finance Committee for recommendation for funding at a future Town Meeting.         |
| 6F<br>Revised | Evaluate Pollution Prevention BMPs for the Fueling Station at the Highway Garage             | Highway Department and Consultant | As-built sketches or plans and photos.                                                  | A Fuel and Oil Handling Standard Operation Procedure has been developed.                                                                      | Continue evaluation process.                                                                 |

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

| BMP ID # | BMP Description                                                                | Responsible Dept./Person Name                                                       | Measurable Goal(s)                              | Progress on Goal(s) – Permit Year 10<br>(Reliance on non-municipal partners indicated, if any) | Planned Activities – Next Permit Period                  |
|----------|--------------------------------------------------------------------------------|-------------------------------------------------------------------------------------|-------------------------------------------------|------------------------------------------------------------------------------------------------|----------------------------------------------------------|
| 6G       | Evaluate Municipal Facilities Throughout Town for Potential Stormwater Impacts | Highway Department and Consultant                                                   | As-built sketches or plans and photos.          | Complete.                                                                                      | Re-evaluate on an as-needed basis.                       |
| Revised  |                                                                                |                                                                                     |                                                 |                                                                                                |                                                          |
| 6H       | Ensure Proper Waste Disposal in Town for Hazardous and Special Wastes          | Highway Department and Board of Health                                              | Document quantity of wastes collected annually. | On-going                                                                                       | Continue hazardous and special waste disposal vigilance. |
| Revised  |                                                                                |                                                                                     |                                                 |                                                                                                |                                                          |
| 6I       | Ensure Water Quality Improvements are Considered for Flood Projects            | Highway Department                                                                  | Records of Flood Control Projects               | N/A.                                                                                           | N/A.                                                     |
| Revised  |                                                                                |                                                                                     |                                                 |                                                                                                |                                                          |
| 6J       | Conduct Town Employee Stormwater Training                                      | Town Administrator, Highway Department, Police and Fire Departments, and Consultant | Attendance sheet and copy of program.           | A Stormwater Management education presentation for Town employees has been developed.          | Conduct training program.                                |
| Revised  |                                                                                |                                                                                     |                                                 |                                                                                                |                                                          |

### 6a. Additions

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

| BMP ID # | BMP Description                                  | Responsible Dept./Person Name                                    | Measurable Goal(s)                                                                                                                     | Progress on Goal(s) – Permit Year 10 (Reliance on non-municipal partners indicated, if any)                       | Planned Activities – Next Permit Period |
|----------|--------------------------------------------------|------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------|-----------------------------------------|
| 7A       | Develop a Water Quality Strategy for 303d Waters | Town Engineer & Consultant                                       | Summary of existing pollution prevention efforts, future needs, and responsible parties. Copy of surface water quality strategic plan. | All roadways scheduled for reconstruction are now constructed with deep sump catch basins and cleanable outfalls. | Continue drainage improvements.         |
| Revised  |                                                  |                                                                  |                                                                                                                                        |                                                                                                                   |                                         |
| 7B       | Implement BMPs from Water Quality Strategy       | Town Engineer, Consultant, & Town Departments (to be determined) | Photographs, logs, and BMP descriptions for completed efforts and water quality improvements.                                          | No progress.                                                                                                      | See BMP 7A                              |
| Revised  |                                                  |                                                                  |                                                                                                                                        |                                                                                                                   |                                         |

**7a. Additions**

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**7b. WLA Assessment**

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

None.

**Part V. Program Outputs & Accomplishments (OPTIONAL)**

**The Town has brought renewed effort to bring Oxford fully into compliance with the NPDES minimum control measures. Programmatic**

|                                                |       |          |
|------------------------------------------------|-------|----------|
| Stormwater management position created/staffed | (y/n) | yes      |
| Annual program budget/expenditures             | (\$)  | \$15,000 |
|                                                |       |          |
|                                                |       |          |

**Education, Involvement, and Training**

|                                                                         |               |               |
|-------------------------------------------------------------------------|---------------|---------------|
| Estimated number of residents reached by education program(s)           | (# or %)      | 30%           |
| Stormwater management committee established                             | (y/n)         | no            |
| Stream teams established or supported                                   | (# or y/n)    | no            |
| Shoreline clean-up participation or quantity of shoreline miles cleaned | (y/n or mi.)  | Appr. 3 miles |
| Household Hazardous Waste Collection Days                               |               |               |
| ▪ days sponsored                                                        | (#)           | 0             |
| ▪ community participation                                               | (%)           | 0             |
| ▪ material collected                                                    | (tons or gal) | 0             |
| School curricula implemented                                            | (y/n)         | no            |
|                                                                         |               |               |
|                                                                         |               |               |

## Legal/Regulatory

|                                                    |                                           | In Place<br>Prior to<br>Phase II | Under<br>Review | 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       |
| ▪                                                  | Post-Development Stormwater Management    |                                  |                 |         | X       |

## Mapping and Illicit Discharges

|                                        |            |              |
|----------------------------------------|------------|--------------|
| Outfall mapping complete               | (%)        | 100%         |
| Estimated or actual number of outfalls | (#)        | 289          |
| System-Wide mapping complete           | (%)        | 100%         |
| Mapping method(s)                      |            |              |
| ▪ Paper/Mylar                          | (%)        | 0%           |
| ▪ CADD                                 | (%)        | 0%           |
| ▪ GIS                                  | (%)        | 100%         |
| Outfalls inspected/screened            | (# or %)   | 20 inspected |
| Illicit discharges identified          | (#)        | 0            |
| Illicit connections removed            | (# )       | 0            |
|                                        | (est. gpd) |              |
| % of population on sewer               | (%)        | 13%          |
| % of population on septic systems      | (%)        | 87%          |
|                                        |            |              |
|                                        |            |              |

## Construction

|                                                                                                   |            |      |
|---------------------------------------------------------------------------------------------------|------------|------|
| Number of construction starts (>1-acre)                                                           | (#)        | 5    |
| Estimated percentage of construction starts adequately regulated for erosion and sediment control | (%)        | 100% |
| Site inspections completed                                                                        | (# or %)   | 100% |
| Tickets/Stop work orders issued                                                                   | (# or %)   | 0    |
| Fines collected                                                                                   | (# and \$) | 0    |
| Complaints/concerns received from public                                                          | (#)        | 3    |
|                                                                                                   |            |      |
|                                                                                                   |            |      |

## Post-Development Stormwater Management

|                                                                                                                          |          |      |
|--------------------------------------------------------------------------------------------------------------------------|----------|------|
| Estimated percentage of development/redevelopment projects adequately regulated for post-construction stormwater control | (%)      | 95%  |
| Site inspections completed                                                                                               | (# or %) | 100% |
| Estimated volume of stormwater recharged                                                                                 | (gpy)    | ?    |
|                                                                                                                          |          |      |
|                                                                                                                          |          |      |

## Operations and Maintenance

|                                                                                                |                |          |
|------------------------------------------------------------------------------------------------|----------------|----------|
| Average frequency of catch basin cleaning (non-commercial/non-arterial streets)                | (times/yr)     | 2-times  |
| Average frequency of catch basin cleaning (commercial/arterial or other critical streets)      | (times/yr)     | 2-times  |
| Total number of structures cleaned                                                             | (#)            | 1,882    |
| Storm drain cleaned                                                                            | (LF or mi.)    | 0        |
| Qty. of screenings/debris removed from storm sewer infrastructure                              | (lbs. or tons) | 900-tons |
| Disposal or use of sweepings (landfill, POTW, compost, recycle for sand, beneficial use, etc.) |                | landfill |
| Cost of screenings disposal                                                                    | (\$)           | 0        |
|                                                                                                |                |          |
|                                                                                                |                |          |
| Average frequency of street sweeping (non-commercial/non-arterial streets)                     | (times/yr)     | 2-times  |



|                                                                                      |                |            |
|--------------------------------------------------------------------------------------|----------------|------------|
| Average frequency of street sweeping (commercial/arterial or other critical streets) | (times/yr)     | 4-times    |
| Qty. of sand/debris collected by sweeping                                            | (lbs. or tons) | 1,500-tons |
| Disposal of sweepings (landfill, POTW, compost, beneficial use, etc.)                | (location)     | landfill   |
| Cost of sweepings disposal                                                           | (\$)           | 0          |
| Vacuum street sweepers purchased/leased                                              | (#)            | 0          |
| Vacuum street sweepers specified in contracts                                        | (y/n)          | no         |
|                                                                                      |                |            |
|                                                                                      |                |            |

|                                                                                        |             |     |
|----------------------------------------------------------------------------------------|-------------|-----|
| Reduction in application on public land of: ("N/A" = never used; "100%" = elimination) |             |     |
| ▪ Fertilizers                                                                          | (lbs. or %) | 20% |
| ▪ Herbicides                                                                           | (lbs. or %) | N/A |
| ▪ Pesticides                                                                           | (lbs. or %) | 20% |
|                                                                                        |             |     |
|                                                                                        |             |     |

|                                                          |                     |     |
|----------------------------------------------------------|---------------------|-----|
| Anti-/De-Icing products and ratios                       | % NaCl              | 95% |
|                                                          | % CaCl <sub>2</sub> |     |
|                                                          | % MgCl <sub>2</sub> | 5%  |
|                                                          | % CMA               |     |
|                                                          | % K <sub>ac</sub>   |     |
|                                                          | % KCl               |     |
|                                                          | % Sand              |     |
| Pre-wetting techniques utilized                          | (y/n)               | yes |
| Manual control spreaders used                            | (y/n)               | yes |
| Automatic or Zero-velocity spreaders used                | (y/n)               | no  |
| Estimated net reduction in typical year salt application | (lbs. or %)         | 25% |
| Salt pile(s) covered in storage shed(s)                  | (y/n)               | yes |
| Storage shed(s) in design or under construction          | (y/n)               | N/A |
|                                                          |                     |     |
|                                                          |                     |     |