

Municipality/Organization: Town of Westford, MA

EPA NPDES Permit Number: MA041232

MADEP Transmittal Number: W-035577

Annual Report Number 9

& Reporting Period: April 1, 2011 -March 31, 2012

NPDES PII Small MS4 General Permit Annual Report

Part I. General Information

Contact Person: Paul Starratt, P.E.

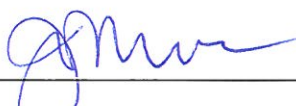
Title: Town Engineer

Telephone #: 978-692-5520

Email: stormwater@westfordma.gov

Certification:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature: 

Printed Name: Jodi Ross

Title: Town Manager

Date: April 30, 2012

Part II. Self-Assessment

The Town of Westford has completed the required assessment and determined that our municipality is in compliance with all permit conditions, except for the following: Stormwater Management Regulations have not been finalized by the Planning Board. Public Hearings for the adoption of the Regulations were open in Year 9 and we anticipate full adoption by July 2012. Until the regulations are established, the Planning Board has adopted interim measures that require the submission of a Storm Water Pollution Prevention Plan (SWPPP) and a NOI for Construction General Permit on projects with land disturbance greater than one acre.

The Town continues to benefit from the active participation of resident volunteers who participate in the Westford Stream Team Program. This year, the Stream Team has published results and recommendations from their 2011 sampling program, including a presentation to the Westford Conservation Commission. Presentation material and sample results are available online at www.westfordma.gov/stormwater. Partnerships with the SuAsCo Watershed Community Counsel, the Organization for the Assabet River (OAR) and the Westford Environmental News and Action Committee have been mutually beneficial. The Westford Town Engineer serves on the SuAsCo Stormwater Committee and Steering Counsel. Year 9 also saw the addition of 28 new stream identification signs that were the result of a cooperative Eagle Scout volunteer and the Westford Highway Department. Signs now identify stream crossings in both the SuAsCo and Merrimack watersheds.

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 9 (Reliance on non-municipal partners indicated, if any) | Planned Activities – Interim Period |
|----------|---|-------------------------------|---|---|--|
| 1A | Stormwater Flyer for Residents | SuAsCo & Westford DPW | Flyers distributed to 75% of residents, compiled & considered “survey” results. | Flyers were mailed in year 1 to all residents. The same flyers were placed on display at the Town Hall. (SuAsCo). Pollution Warning mailed to all Westford Residents in 2012 Census Newsletter. | Continue displaying flyers at public places. Join mailing opportunities with Town Clerk’s Office and Water Department. |
| Revised | | | | | |
| 1B | Lesson Plan for 5 th Graders | SuAsCo & Westford DPW | Develop & distribute lesson plan, teach in one or more grade 5 classes. | The Westford Engineering Department continued to use the SuAsCo curriculum “Stormwater Matters” to teach an introductory lesson plan to all | The Westford Engineering Department has elected to continue the lesson plan on an annual basis with assistance from local schools. |

| | | | | | |
|---------|--|-------------------------|--|--|---|
| Revised | | | Continued beyond Year 5 based on success of program. | grade 5 classes during the 2012 Living Lab program. | Every 5 th grader in the Westford Public Schools participates. |
| 1C | Stormwater Flyer for Businesses | SuAsCo & Westford DPW | Flyers distributed to 50% of businesses, stormwater logo displayed by 25% of businesses. | <i>Stormwater Matters</i> local business flyer, as prepared by SuAsCo, mailed to 450 business addresses in Westford in Year 8. | Continue to promote stormwater awareness to the local business community. |
| Revised | | | | | |
| 1D | Stormwater Media Campaign | SuAsCo & Westford DPW | Media information packet, 4 press releases generated. | Implement SuAsCo Year 6 product Survey and display for Stormwater “Go Green” product at Special & Annual Town Meetings. | Implement SuAsCo Year 10 product upon delivery. |
| Revised | | | | | |
| 1E | Stormwater Video | SuAsCo & Westford DPW | Show video at one public meeting and once on local cable. | <i>Spotlight on Stormwater</i> was broadcast on Westford Community Access TV as presented at Board of Selectmen meeting by Town Engineer. Web link added to Engineering website. | Rebroadcast <i>After the Storm</i> in 2012. |
| Revised | | | | | |
| 1F | Recycling/Trash Info. on Website | Recycling Commission | Update website regularly, display pamphlets in Town Clerk’s Office | The Recycling Commission updated the website as needed. http://www.westfordrecycles.org/ Collection calendar at Clerk’s Office. | Continue website updates and display pamphlets in Town Clerk’s Office |
| Revised | | | | | |
| 1G | Recycling/Trash Mailing to Residents | Recycling Commission | Mail to 75% of residents and display pamphlets in Town offices. | Pamphlets were mailed to all residents and copies were made available at the Town Hall. | Continue displaying pamphlets at public places. |
| Revised | | | | | |
| 1H | Advertise HHW Info. in Community Phonebook | Recycling Commission | Copy of advertisement in the phonebook. | Information about the household hazardous waste collection was advertised in the local phonebook “2011-2012 Westford Directory” on pages 24 & 30 and “Community Phonebook,” pages 22 & 23. | Continue to advertise the proper method of disposal for hazardous household wastes. |
| Revised | | | | | |
| 1I | Advertise Brush/Multi Collection on Cable and in Paper | Recycling Commission | Copy of advertisement on cable, website and local paper. | The brush and multi collection events were advertised on cable, website, the local paper, roadside signs and local phone directory. | Continue advertising the brush and multi collection events. |
| Revised | | | | | |
| 1J | Leaf Dumping Article in Paper | Conservation Commission | Copy of article in local paper once per year. | An article discussing the proper disposal of leaves and yard waste | Continue placing the leaf dumping article Westford Directory. |

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|---------|---|--------------------------------------|--|---|---|
| Revised | | | Posted on Cons-Comm website | published in “2011-2012 Westford Directory” on pages 10 & 24. | |
| 1K | Leaf Dumping Pamphlet to Public | Conservation Commission | Copy of pamphlet, # of residents reached. | Dates, time, location and contact information for leaf disposal and compost published in local phone book, “2011-2012 Westford Directory” on Page 10 & 24. | Continue publishing information on proper leaf disposal and composting. |
| Revised | | | Publish leaf disposal notice in local phone book | | |
| 1L | Leaf Dumping Pamphlet at Events | Conservation/ Water/ Board of Health | Pamphlet displayed at two events. | The leaf dumping educational pamphlet was displayed at the Health Fair and Drinking Water Day. | Continue displaying pamphlet at two events. |
| Revised | | | | | |
| 1M | Fertilizer Pamphlet to Businesses | Water Department | Copy of pamphlet, distributed to all landscaping businesses. | A draft policy was presented and approved by the Board of Selectmen and the Board of Health. The policy was developed with the long-term goal of protecting public health and maintaining balanced and healthy ecosystems for the Town of Westford. | Continue to eliminate where possible and otherwise minimize the use of pesticides on Town-owned land and to encourage the same on private-owned land. Enforce Pesticide Policy. |
| Revised | Town of Westford Pesticide Policy | | Develop Pesticide Policy for Town of Westford | | |
| 1N | Fertilizer Info. in Newsletter | Water Department/ Engineering | Copies of semi-annual newsletters discussing fertilizers. | Healthy Lawns for Healthy Families fertilizer information was added to the Westford Water Department website. | Continue promoting Healthy Lawns for Healthy Families. |
| Revised | | | | | |
| 1O | Septic System Pamphlets in Water Department | Water Department | Pamphlets available at Water Department at all times. | Septic system Pamphlets were made available at the Water Department throughout the year. | Continue to make septic system pamphlets available. |
| Revised | | | | | |
| 1P | Septic System Pamphlets at Events | Water Department/ Board of Health | Display pamphlets at two events. | The septic system educational pamphlet was displayed at the Annual Health Fair and Drinking Water Day. | Continue displaying pamphlet at two events. |
| Revised | | | | | |
| 1Q | Hazardous Material Bylaw Info. on Website | Board of Health | Maintain website regularly. | Hazardous material bylaw information was posted on the Town’s website. | Continue website postings. |
| Revised | | | | | |

1a. Additions

2. Public Involvement and Participation

| BMP ID # | BMP Description | Responsible Dept./Person Name | Measurable Goal(s) | Progress on Goal(s) – Permit Year 9 (Reliance on non-municipal partners indicated, if any) | Planned Activities – Interim Period |
|-----------------|---|---|---|---|---|
| 2A Revised | Stormwater Traveling Display | SuAsCo & Westford DPW | | Completed in Year 1. Display used at 5 th grade Living Lab program and Town Meeting. SuAsCo “Go Green” display added to Town Meeting. Display was setup at the Water Department 5/4/11 open house. | Continue using the displays and pamphlets at the 5 th grade Living Lab program, Town Meeting and Water Department Open House events. |
| 2B Revised | Poster Contest for Fifth Grader <i>Revised to 4th Graders</i> | SuAsCo & Westford DPW Westford Water Department | Poster contest is held and entries are received, judged and displayed in year 2. | Annual Water Department 4 th Grade Poster Contest to include pollution prevention. Cash prizes awarded to top three posters from each school. | Continue 4 th Grade Poster Contest |
| 2C Revised | Poster Contest for High Schoolers | SuAsCo & Westford DPW Eliminated from Year 3 product by SuAsCo. | Poster contest is held and entries are received, judged and displayed in year 3. | NOI specified to begin this BMP in Permit Year 3. Eliminated from Year 3 product by SuAsCo. Water Department will hold Poster Contest for 4 th Graders. | Continue 4 th Grade Poster Contest |
| 2D Revised | Local Stormwater Summit Event | SuAsCo & Westford DPW SuAsCo W. C. C. Land and Habitat Working Group | Hold local multi-community summit in year 4. | Completed in Year 4. | Continue information sharing with other stakeholders across the Nashoba Brook sub-basin. |
| 2E Revised | Stormwater Super Summit Event | SuAsCo & Westford DPW | Municipal participation in the Super Summit, stormwater “survey” to 75% residents, compiled & considered results. | Stormwater Super Summit eliminated from SuAsCo Year 5 product | Reevaluate possibility of a future summit with SuAsCo. |

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|---------|--|---------------------------------------|--|---|---|
| 2F | Curbside Recycling | Department of Public Works | Continued Town service. | Curbside recycling was picked up every other week. | Continue Curbside Recycling program. |
| Revised | | | | | |
| 2G | In Town HHW Drop-off | Department of Public Works | Hold at least one event per year. | Household hazardous waste collection event occurred on 11/6/10 and Electronics Collection was on 3/17/12 & 9/17/11 at the Westford Highway Facility. | Continue HHW event. |
| Revised | | | Every other year. | | |
| 2H | HHW Drop-off in Lexington | Department of Public Works | Advertise service on the Town website and in flyers. | www.westfordma.gov/recycle 2011- 2012 Westford Directory on Page 24 | Continue advertise and promote HHW collection opportunities. |
| Revised | | | Also advertise in local phone book. | | |
| 2I | Leaf Drop-off at Laughton's Nursery | Department of Public Works | Continue service of leaf drop-off. | Leaf drop off was made available at Laughton's Nursery, but a fee was charged by the nursery to accept materials. Laughton's Nursery has been developed into a subdivision. Leaf drop off is available at Eric's Garden Center or Jones Farm for a fee. | Laughton Farm being developed in 2010. Locate new property for Leaf Drop-off Continue to use Eric's Garden Center and Jones Farm as a leaf drop off. |
| Revised | | | Advertise on the Town website and in flyers. | | |
| 2J | Brush Drop-off in Westford | Department of Public Works | Hold one collection in April and October. | Brush chipping service provided on 4/9/11 & 10/22/11 at Westford Highway Facility. Brush chipping service also provided on 11/13/11, 11/19/11, 11/20/11 and 11/27/11 associated with 10/29/11 storm. | Hold at least two collection events. |
| Revised | | | | | |
| 2K | Multi-Collection Events | Dep't of Public Works/Board of Health | Hold one multi-collection event twice per year. | Two multi-collection events were held to collect small mercury-containing devices. | Hold at least two collection events. |
| Revised | | | | | |
| 2L | Mercury Drop-off at Board of Health | Board of Health | Collect mercury devices in the Board of Health office daily. | The Board of Health office was open daily to receive mercury-containing devices. | Continue mercury drop-off program. |
| Revised | | | | | |
| 2M | Mercury Drop-off at Multi-Collection Event | Department of Public Works | Hold one multi-collection event twice per year. | Two multi-collection events were held to collect small mercury-containing devices. | Hold at least two collection events. |
| Revised | | | | | |

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|---------|-------------------------------------|----------------------------|---|--|--|
| Revised | | | | | |
| 2N | Public Meetings | Department of Public Works | Advertise and hold at least one public meeting every year for stormwater. | <i>Spotlight on Stormwater</i> was broadcast on Westford Community Access TV as presented at Board of Selectmen meeting by Town Engineer. | Hold a public meeting to inform residents of the stormwater program. |
| Revised | | Engineering Department | | <i>Spotlight on Stormwater</i> is available for viewing on Westford Community Access TV with a link on the Engineering Department website. | |
| 2O | Stormwater Contact | Highway Department | Establish contact and include information in pamphlets and on the Town's website. | The Town Engineer was identified as the stormwater contact regarding pollution and complaints in Year 1. Information was posted on the Town's website. Established stormwater email contact at stormwater@westfordma.gov | Update information as needed and continue to include stormwater contact information on the Town's website. Include contact information in educational pamphlets. Track stormwater emails and issues addressed. |
| Revised | Procedure to Address Public Comment | | Record of calls and issues addressed. | | |

2a. No additions at this time.

3. Illicit Discharge Detection and Elimination

| BMP ID # | BMP Description | Responsible Dept./Person Name | Measurable Goal(s) | Progress on Goal(s) – Permit Year 9 (Reliance on non-municipal partners indicated, if any) | Planned Activities – Interim Period |
|----------|------------------------------|--------------------------------|---|--|---|
| 3A | Storm Sewer Map | Highway Department/ GIS | Expand and field verify all outfalls by year 5. | Stormwater Map completed. | Maintain GIS database. |
| Revised | | Engineering Department/ GIS | | | |
| 3B | Illicit Discharge Bylaw | Engineering/ Conservation | Present draft bylaw to public in year 4, adopt in year 5. | Town issued an Enforcement Order in Year 9 for violation of the Illicit Discharge Bylaw. | Continue to enforce Illicit Discharge Bylaw. |
| Revised | | Board of Health | | | |
| 3C | Detection & Elimination Plan | Highway Department | Screen 25% of outfalls each year in 4 divided sections of Town. | Woodard & Curran and Town staff conducted two days off IDDE field work in pollution sensitive areas. | Continue to screen and inspect outfalls for illicit discharges. Implement the IDDE plan developed |

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|---------|---|--|---|--|--|
| Revised | | | Prioritize areas of known water quality problems for inspections and removal of illicit discharges. | An unauthorized connection was discovered in Year 9 through smoke testing conducted on the town drainage system. It was determined to be an overflow from a residential septic system. An Enforcement Order was issued and the connection was permanently disconnected. An IDDE plan and manual was prepared by Woodard & Curran which included a protocol and written strategy for Illicit Discharge Detection and Elimination activities. | by Woodard & Curran. |
| 3D | Illicit Discharge Education for Public | SuAsCo/Public Works/ Highway/ Water/ Board of Health | Continued public education under Control Measures 1 and 2. | Pollution Warning mailed to all Westford Residents in 2012 Census Newsletter. Supported Westford Stream Team request for funding to purchase water sampling equipment. | Support and encourage public participation and involvement in local Stream Teams and groups that promote environmental awareness and activism. |
| Revised | | | Partner with Westford Environmental News and Action Committee (WENAC) and the Organization for the Assabet River (OAR). | | |
| 3E | Illicit Discharge Education for Municipal Employees | Highway Department | Education for employees under BMP 6H. | Woodard & Curran provided IDDE training on 3/26/11 for various town departments. | Continue municipal employee training program. Contracted with Woodard & Curran to provide IDDE training in Year 10. |
| Revised | | | | | |

3a. No additions at this time.

4. Construction Site Stormwater Runoff Control

| BMP ID # | BMP Description | Responsible Dept./Person Name | Measurable Goal(s) | Progress on Goal(s) – Permit Year 9 (Reliance on non-municipal partners indicated, if any) | Planned Activities – Interim Period |
|----------|-----------------|-------------------------------|--------------------|---|-------------------------------------|
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|---------|-------------------------------------|-------------------------------------|--|--|---|
| 4A | Wetlands Bylaw | Conservation Commission | Continue to implement existing Wetlands Bylaw. | The Town of Westford Conservation Commission enforced the Westford Wetlands Bylaw and Regulations. | Continue enforcement of Wetlands Bylaw and Regulations. |
| Revised | | | | | |
| 4B | Construction Site Runoff Bylaw | Engineering/ Planning/ Conservation | Present draft bylaw to public in year 4, adopt in year 5. | Stormwater Management Bylaw adopted at Special Town Meeting on May 10, 2008 and approved by Attorney General on August 5, 2008. | Continue enforcement of Stormwater Management Bylaw. |
| Revised | | | | | |
| 4C | Erosion, Sediment & Waste Controls | Engineering/ Planning/ Conservation | Copies of meeting minutes and memos. Improved site controls in year 4. | Stormwater Management Bylaw adopted at Special Town Meeting on May 10, 2008 and approved by Attorney General on August 5, 2008. | Continue enforcement of Stormwater Management Bylaw. |
| Revised | | | | | |
| 4D | Site Plan Review Procedures | Engineering/ Planning/ Conservation | Improved site plan review procedures in year 4. | Site plans are currently reviewed by the Engineering Department and Conservation Commission for erosion and construction site runoff BMPs. | Hold progress meetings, evaluate site plan review criteria and incorporate into the draft regulations for Stormwater Management Bylaw. |
| Revised | | | | | |
| 4E | Site Inspection & Enforcement | Engineering/ Planning/ Conservation | Records of current enforcement actions, site inspection procedures for all land disturbance >1 acre. | Stormwater Management Bylaw adopted at Special Town Meeting on May 10, 2008 and approved by Attorney General on August 5, 2008. | Continue enforcement of Stormwater Management Bylaw. |
| Revised | | | | | |
| 4F | Construction Site Contact | Highway Department | Establish contact and include information in pamphlets and on the Town's website. | The Town Engineer was identified as the stormwater contact regarding pollution prevention, complaints and construction runoff in Year 1. | Update information as needed and continue to include stormwater contact information on the Town's website. Include contact information in educational pamphlets. Track stormwater calls and emails. |
| Revised | Procedure to Address Public Comment | | Record of calls and issues addressed. | Established stormwater email contact at stormwater@westfordma.gov | |

4a. No additions at this time.

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 9 (Reliance on non-municipal partners indicated, if any) | Planned Activities – Interim Period |
|-----------------|--|---|--|---|---|
| 5A | Post-Construction Site Runoff Bylaw | Engineering/ Planning/ Conservation | Present draft bylaw to public in year 4, adopt in year 5. | Planning Board continued to issue Stormwater Management Permits under the Stormwater Management Bylaw, including a SWPPP with O&M requirements. | Continue enforcement of Stormwater Management Bylaw. |
| Revised | | | | | |
| 5B | Structural & Non-Structural BMPs | Engineering/ Planning/ Conservation | BMP design standards specific to the Town of Westford. | BMP design standards were introduced and discussed at the August 9, 2004 kick-off meeting. | Hold progress meetings and evaluate BMPs and design standards desirable by the Town of Westford. Incorporate results into the draft regulation for Stormwater Management Bylaw. |
| Revised | BMP Design Standards | | | | |
| 5C | Long-Term Operation & Maintenance | Engineering/ Planning/ Conservation | O&M Plan/template and procedures required for new and redevelopment | Methods to address BMP operation and maintenance were discussed at the August 9, 2004 kick-off meeting. | Hold progress meetings and evaluate BMP O&M Plans, templates and methods for long-term effectiveness. |
| Revised | | | | | |
| 5D | Structural BMP Implementation Procedures | Engineering/ Planning/ Conservation | Inspection and enforcement procedures to ensure BMPs are installed properly. | Methods to address BMP implementation procedures were not specifically discussed at the August 9, 2004 kick-off meeting. | Hold progress meetings and evaluate methods to inspect and enforcement BMP installation. Incorporate results into the draft regulation for Stormwater Management Bylaw. |
| Revised | | | | | |

5a. No additions at this time.

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 9 (Reliance on non-municipal partners indicated, if any) | Planned Activities – Interim Period |
|-----------------|------------------------|--------------------------------------|---------------------------|--|--|
|-----------------|------------------------|--------------------------------------|---------------------------|--|--|

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|---------|--|----------------------------|---|---|--|
| 6A | Catch Basin Schedule | Highway Department | Clean all catch basins and prioritize locations for cleaning. | All catch basins were cleaned in town at least once and twice on hills. Catch basins are visually inspected during cleaning to ensure proper function of the drainage system and to identify any illicit discharge connections. | Continue catch basin cleaning and inspection program annually. Continue documenting structure conditions and sediment data for future cleaning and maintenance priorities. Continue to identify illicit discharge connections. |
| Revised | | | | | |
| 6B | Regular Street Sweeping | Department of Public Works | Sweep streets a minimum of twice per year. | All streets were swept twice a year in town. | Continue street sweeping program annually. |
| Revised | | Highway Department | | | |
| 6C | Sand/Salt Covered | Highway Department | Sand and salt storage is covered. | Sand and salt storage was covered. | Continue to cover sand and salt. |
| Revised | | | | | |
| 6D | Used Oil is Recycled | Highway Department | Waste oil recycling at the Highway Facility is permitted. | The Highway Department maintained permit compliance for the waste oil heater and recycling operation. | Continue existing practices for waste oil recycling to maintain permit compliance. |
| Revised | | | | | |
| 6E | Municipal Hazardous Material Stored Inside | Highway Department | All hazardous materials are stored indoors. | The Highway Department stored all hazardous materials indoors. | Continue to store all hazardous materials indoors. |
| Revised | | | | | |
| 6F | Implement SWPPP at Garage | Highway Department | SWPPP implemented and maintained. | The Highway Department implemented BMPs outlined in the Garage SWPPP. | Continue existing practices for pollution prevention and good housekeeping. |
| Revised | Implement SWPPP BMPs at Garage | | SWPPP BMPs implemented. | | |
| 6G | Increase Vehicle Fueling Cover | Highway Department | Increase cover until new facility is constructed. | Occupied new facility in September 2006 | Utilize covered fueling station at the new DPW Facility. |
| Revised | | | | | |

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|---------|--------------------------------------|--------------------|---|---|--|
| 6H | Municipal Employee Training | Highway Department | All Highway Department employees trained annually, record of attendance sheet. Copy of training program | Highway Department issued copies of Organization for the Assabet River employee training materials to newly hired employees. | Continue existing training programs, incorporate new topics and expand programs as appropriate. |
| Revised | | | | | |
| 6I | Municipal Operation/Maintenance Plan | Highway Department | Improved operations at municipal facilities and throughout Town. | Municipal facilities are evaluated on a regular basis for pollution issues. Work began to document protocols for municipal operations. The Town began work to develop a Beneficial Use Determination (BUD) for the reuse of stormwater residuals. | Evaluate and document BMP evaluations and draft BMPs for municipal facilities and operations. Begin compiling a draft Municipal Operation and Maintenance Plan and continue to develop a BUD for stormwater residuals. |
| Revised | | | | | |

6a. Addition

| BMP ID # | BMP Description | Responsible Dept./Person Name | Measurable Goal(s) | Progress on Goal(s) – Permit Year 9 (Reliance on non-municipal partners indicated, if any) | Planned Activities – Interim Period |
|-----------------|--|--------------------------------------|--|--|--|
| 6J | Mosquito Control Project & Drainage System Maintenance | Engineering/Conservation | Record of improved drainage system inspection and maintenance. | Through the efforts of the Central Massachusetts Mosquito Control Project, brush and other accumulated debris was removed from culverts and streams to ensure proper flow conditions and reduce the amount of stagnant water available for mosquito breeding. Cleaning areas were recorded to determine future cleaning needs. The Town is in the process of preparing final design plans to remove and replace an under-sized culvert on Route 40 at Keyes Brook in order to improve drainage conditions and improve environmental conditions. | Continue mosquito control program. Bid the Route 40 Keyes Brook culvert project and begin construction. |
| Revised | | | | | |

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 9 (Reliance on non-municipal partners indicated, if any) | Planned Activities – Interim Period |
|----------|-----------------|-------------------------------|--------------------|---|-------------------------------------|
| ----- | ----- | ----- | ----- | March 2009 Town Meeting approved a \$25,000 capital outlay to complete a TMDL Study. | Complete TMDL study. |

7a. No additions at this time.

7b. WLA Assessment

Stony Brook in Westford is a 303d listed water that is classified as Category 5 “Waters Requiring a TMDL”. Water quality concerns associated with Stony Brook will be addressed through the implementation of BMPs under the six minimum measures for Phase II, as outlined in the Westford Stormwater Management Plan (SWMP). Stony Brook is highlighted in the Westford SWMP as a priority for implementation activities throughout the permit term. The WLA Assessment will be addressed as part of the Town’s SWMP, as the TMDL study is completed for Stony Brook or those water bodies with watersheds in Westford. March 2009 Town Meeting approved a \$25,000 capital outlay to undertake a TMDL Study and the Town has retained the services of a stormwater consultant (Woodard & Curran) to complete the study once the new permit is issued by the EPA.

Part IV. Summary of Information Collected and Analyzed

Six unauthorized connections were discovered in Year 9 and determined to be conveyance of stormwater from residential properties.

An illicit discharge associated with a private septic system overflow pipe was found to be connected to the Town’s drainage system and removed. The connection was found during an inspection of the drainage system and subsequent smoke testing.

Part V. Program Outputs & Accomplishments (OPTIONAL)

The Westford Stream Team published results and recommendations from 2011 sampling program and presented findings to the Westford Conservation Commission. Presentation material can be viewed at www.westfordma.gov/stormwater

28 stream identification signs were installed to promote public awareness of natural resources in Westford in Year 9.

Programmatic

*Town of Westford NPDES PII Small MS4 General Permit Annual Report
MADEP Transmittal Number: W-035577*

| | | |
|--|-------|-----------|
| Stormwater management position created/staffed | (y/n) | No |
| Annual program budget/expenditures (Fiscal Year) | (\$) | \$126,325 |
| | | |

Education, Involvement, and Training

| | | |
|---|---------------|----------------------------|
| Estimated number of residents reached by education program(s) | (# or %) | Households* |
| Stormwater management committee established | (y/n) | Yes** |
| Stream teams established or supported | (# or y/n) | Yes |
| Shoreline clean-up participation or quantity of shoreline miles cleaned | (y/n or mi.) | 2.5 Miles*** |
| Household Hazardous Waste Collection Days | | |
| ▪ days sponsored | (#) | 3 |
| ▪ community participation | (%) | U.K. |
| ▪ material collected | (tons or gal) | See Below |
| School curricula implemented | (y/n) | Yes: 5 th Grade |
| * 2012 Census Newsletter mailing sent to every Westford Household. | | |
| ** Project Advisory Committee (Smart Growth Technical Assistance Grant) | | |
| *** Nabnasset Improvement Association & Friends of Forge Pond Annual Clean Up | | |

Legal/Regulatory

| | In Place Prior to Phase II | Under 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* | |

* Planning Board opened Public Hearing for adoption of Stormwater Management Regulations in Year 9.

Mapping and Illicit Discharges

| | | |
|---|-------------------|-----------------|
| Outfall mapping complete | (%) | 100% |
| Estimated or actual number of outfalls | (#) | 616 |
| System-Wide mapping complete | (%) | 100% |
| Mapping method(s) | | |
| ▪ Paper/Mylar | (%) | |
| ▪ CADD | (%) | |
| ▪ GIS | (%) | 100% |
| Outfalls inspected/screened | (# or %) | 100%* |
| Illicit discharges identified | (#) | 1 |
| Illicit connections removed | (#) (est. gpd) | 1 50 gpd +/- |
| % of population on sewer | (%) | |
| % of population on septic systems | (%) | 100% |
| *The Westford Highway Department inspects stormwater outfalls on an annual basis for drainage and erosion problems. The Engineering Department is systematically inspecting outfalls for illicit discharge detection and elimination. | | |

Construction

| | | |
|---|------------|-------------|
| Number of construction starts (>1-acre) | (#) | 8 (Approx.) |
| 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 |

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Post-Development Stormwater Management

| | | |
|--|----------|--------------|
| Estimated percentage of development/redevelopment projects adequately regulated for post-construction stormwater control | (%) | 100% |
| Site inspections completed | (# or %) | U.K. |
| Estimated volume of stormwater recharged | (gpy) | Not Assessed |
| | | |

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) | 1-2/yr ¹ |
| Total number of structures cleaned | (#) | 3,454 approx. |
| Storm drain cleaned | (LF or mi.) | 1,000 LF approx. |
| Qty. of screenings/debris removed from storm sewer infrastructure | (lbs. or tons) | 423.63 Tons |
| Disposal or use of sweepings (landfill, POTW, compost, recycle for sand, beneficial use, etc.) | | Disposal |
| Cost of screenings disposal | (\$) | \$8,896.23 |
| 1. Drainage structures in hilly areas are cleaned more frequently based on the rate of sediment accumulation. | | |

| | | |
|--|----------------|-------------|
| 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) | 2 |
| Qty. of sand/debris collected by sweeping | (lbs. or tons) | 241.81 Tons |
| Disposal of sweepings (landfill, POTW, compost, beneficial use, etc.) | (location) | Disposal |
| Cost of sweepings disposal | (\$) | \$4,352.58 |
| Vacuum street sweepers purchased/leased | (#) | 1 owned* |
| Vacuum street sweepers specified in contracts | (y/n) | Y |

*The Town owns 1 mechanical sweeper and contracted another sweeper to complete all roads in Town.

| | | |
|---|-------------|------|
| Reduction in application on public land of: (“N/A” = never used; “100%” = elimination) | | |
| ▪ Fertilizers | (lbs. or %) | 0% |
| ▪ Herbicides | (lbs. or %) | 95%* |
| ▪ Pesticides | (lbs. or %) | 95%* |
| * Town of Westford Pesticide Policy requires 100% elimination except in emergencies. Estimated 5% emergency applications. | | |

| | | |
|---|---------------------|---------------|
| Anti-/De-Icing products and ratios | % NaCl | |
| <i>Ice-Ban (MgCl₂) is applied to a 90:10 sand/salt mixture with a sprayer as the materials are dispensed from trucks during de-icing activities. On some occasions, straight salt applications are used in town.</i> | % CaCl ₂ | |
| | % MgCl ₂ | |
| | % CMA | |
| | % Kac | |
| | % KCl | |
| | % Sand | |
| Pre-wetting techniques utilized | (y/n) | Yes |
| Manual control spreaders used | (y/n) | Yes |
| Automatic or Zero-velocity spreaders used | (y/n) | Zero Velocity |
| Estimated net reduction in typical year salt application | (lbs. or %) | Not Assessed |
| Salt pile(s) covered in storage shed(s) | (y/n) | Yes |
| Storage shed(s) in design or under construction | (y/n) | No |
| | | |