

Needham, MA

Stormwater Pollution Prevention Plan (SWPPP)

Department of Public Works

November 2021

**RECYCLING AND TRANSFER STATION
1421 CENTRAL AVENUE**



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RECYCLING AND TRANSFER STATION

1421 CENTRAL AVENUE

Prepared by: BETA GROUP, INC.

Prepared for: Town of Needham

November 2021

SWPPP 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 gathered and evaluated 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.



Authorized Official

Director of Public Works

Title

December 1, 2021

Date

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INTRODUCTION

This Stormwater Pollution Prevention Plan (SWPPP) has been developed by BETA Group, Inc. (BETA) on behalf of the Town of Needham (the Town), Massachusetts, Department of Public Works (DPW) to address the requirements of the United States Environmental Protection Agency (EPA) 2016 National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater Discharges from Small Municipal Separate Storm Sewer Systems (MS4) in Massachusetts, hereafter referred to as the PERMIT. This SWPPP is outlined as follows:

1. *Pollution Prevention Team*
2. *Description of Facility*
3. *Identification of Stormwater Controls*
4. *Management Practices*
5. *Site Inspections*

1.0 POLLUTION PREVENTION TEAM

The Needham DPW has assigned a Pollution Prevention Team (PPT) for this SWPPP. PPT team members and contact information are summarized below. The role of the PPT is to develop, implement, maintain, and revise as necessary, this SWPPP. The PPT also has the following responsibilities:

Name:	Anthony Del Gaizo	Title:	Town Engineer	Department:	DPW
Phone:	781-455-7550	Email:	adelgaizo@needhamma.gov		
Responsibilities: Considers all stages of plan development, inspections, and implementation; coordinates employee training programs; maintains all records and ensures that reports are submitted; oversees sampling program. Responsible for certifying the completeness and accuracy of the SWPPP. Implements the preventative maintenance program; oversees good housekeeping activities; serves as spill response coordinator; conducts inspections; assists with employee training programs; conducts sampling/visual monitoring. Assists in all components of the stormwater program, as needed. Maintains spill kits at Recycling and Transfer Station.					

Name:	Melissa Recos, PE	Title:	Project Manager	Company	BETA Group
Phone:	781-255-1982	Email:	MRecos@beta-inc.com		
Responsibilities: MS4 Consultant to the Town					

2.0 DESCRIPTION OF FACILITY

2.1 FACILITY SUMMARY

The Recycling and Transfer Station is located at 1421 Central Avenue in Needham, Massachusetts (the site) and is owned and operated by the Town. Information provided in this, and the following sections is based on observations made during a site visit on February 11, 2021. During the site visit, BETA personnel were escorted by Needham DPW staff who provided a general overview and layout of facility operations, activities performed and material storage information.

The site consists of one irregular-shaped parcel that includes approximately 75.9 acres of land improved with three buildings, six storage facilities, and two employee trailers. Buildings are primarily located along the southern portion of the property, which is primarily paved. North of the structures is a capped landfill that makes up the majority of the property. The site is located in an area primarily used for residential and recreational purposes. The site's location is depicted on the **Site Map** included in **Appendix A**. Pertinent site details, including layout, location of any stormwater outfalls, receiving waters and structural controls, are depicted on the **Site Map**.

2.2 SITE MAP

The facility operates on approximately 14.5 acres out of 75.9 acres and contains the structures and other features identified above, shown on the **Site Map** and described in detail in the following sections. Components shown on the site map include as applicable:

- Location of the engineered drainage system, including catch basins, ditches, drain manholes, and treatment BMPs
- Outfalls to a receiving water, and the name of the receiving water
- Direction of surface water flow
- Structural stormwater pollution control measures
- Vehicle fueling areas
- Aboveground storage tanks (indoors and outdoors)
- Chemical storage areas
- Salt storage areas
- Materials stockpiles
- Waste disposal areas

2.2.1 INVENTORY OF BUILDING

The site includes the following buildings and structures and their use:

Table 2.1 - Inventory of Buildings

No.	Use	Floor Drain
1	Municipal Solid Waste Building/Loading Floor	☒ Y ☐ N
2	Salt Shed	☐ Y ☒ N
3	Construction Material Stockpile Storage	☐ Y ☒ N
4	Rex Building	☐ Y ☒ N
5	Employee Trailers (2)	☐ Y ☒ N
6	Exterior Equipment Storage (3)	☐ Y ☒ N
7	Paint Storage Locker	☐ Y ☒ N
8	Swap Shop	☐ Y ☒ N

2.2.2 PARKING AREAS

Employee parking is provided on site.

2.2.3 INVENTORY OF VEHICLES & EQUIPMENT

The Town maintains an inventory of vehicles and heavy equipment used and stored at this facility. A copy of the inventory is included in **Appendix B**.

2.3 SITE DRAINAGE & RECEIVING WATERS

Drainage from the impervious surfaces at the Recycling and Transfer Station is directed to a series of catch basins and to a primary detention basin ultimately draining to an existing wetland area located at the southwest portion of the site. A secondary detention basin is located at the upper northwest portion of the property behind the compost area that connects to the existing capped landfill.

Engineered drainage at the RTS includes approximately 14 catch basins, 2 detention basins, 1 sediment forebay and 5 stormwater outfalls (2 to existing wetlands and 3 to a detention basin on-site). Maintenance of the catch basin structures, including sediment removal, is completed by the Department of Public Works. Surface runoff flow direction, drainage structures and features are indicated on the **Site Map**.

2.3.1 RECEIVING WATERS

The final point of discharge is Fuller Brook, listed as a Category 5 Surface Water, indicating that more than one designated use is impaired and that a TMDL will be required. The impairment of this river, assigned the unique identifier MA72-18, is considered a Category 5, meaning that more than one designated use is impaired and that a TMDL will be required.

Impairments of this water body are shown in Table 2-2, below.

Table 2-2. Impaired Waters Receiving Drainage from the Facility

Water Body Name	ID	Category	Impairment(s)
Fuller Brook	MA72-18	5	Escherichia coli
Fuller Brook	MA72-18	5	Nutrient/Eutrophication Biological Indicators

The types of impairments documented for this surface water body are related to nutrient/eutrophication biological indicators. Good housekeeping practices, preventative maintenance and Best Management Practices implemented at the facility are methods to limit potential negative impacts to stormwater. These practices are discussed in **Section 6** of this SWPPP.

2.4 POTENTIAL POLLUTANT SOURCES

An inventory of activities performed at the site and associated potential stormwater pollutants is provided in **Appendix C**. Locations of activities and potential stormwater pollutants are indicated on the **Site Map**.

3.0 STORMWATER CONTROLS

Structural stormwater controls including drainage structures, pipes and conveyances; stormwater best management practices (BMPs) and outfall(s) are shown on the **Site Map**. These controls, used and maintained in accordance with good engineering practices, manufacturer's specifications and management practices detailed in **Section 4.0** below, address the quality of discharges from the site.

3.1 WATER QUALITY LIMITATION CONTROLS

The following control measures are used specifically to address the pollutants contributing to the bacteria impairment in the downstream waterbody:

- Parking lot sweeping
- Catch basin cleaning
- Routine leaf-litter and debris collection
- Storage of potential stormwater pollutants (solid waste, etc.) under covered areas

4.0 MANAGEMENT PRACTICES

The following sections summarize the management practices (non-structural stormwater controls) to be implemented at the site to mitigate the potential for potential pollutants to impact stormwater.

4.1 MINIMIZE OR PREVENT EXPOSURE

To the extent practicable, either locate materials and activities inside or protect them with storm-resistant coverings in order to prevent exposure to rain, snow, snowmelt and runoff (although significant enlargement of impervious surface area is not recommended). Materials do not need to be enclosed or covered if stormwater runoff from affected areas will not be discharged directly or indirectly to surface waters or to the MS4 or if discharges are authorized under another NPDES permit.

Vehicle Storage

Rainfall on vehicles and equipment storage areas has the potential to collect pollutants and result in high loads of nutrients, metals, and hydrocarbons in stormwater runoff. To prevent this, best management practices include the following:

- All vehicles, equipment and hazardous waste storage containers should receive regular maintenance and be inspected for leaks or defective parts.
- Vehicles and equipment should be stored on a covered slab or within a building with a common drain that discharges to an oil/water separator.
- Outdoor storage of vehicles and equipment should not occur in areas that drain to the storm drain system unless adequate devices are in place to remove oil, sediment and other pollutants.
- Vehicles with fluid leaks should be stored indoors or containment be provided until repaired.

Vehicle and Equipment Maintenance

Vehicle and equipment maintenance shall be conducted in a manner to reduce the discharge of pollutants by following these best management practices:

- Conduct routine inspections of heavy equipment and vehicles to proactively identify maintenance needs or potential leaks.
- Use drip pans as needed until repairs can be performed and when drip pans are used, avoid overflowing.
- Drain fluids from leaking or wrecked vehicles and parts as soon as possible. Dispose of fluids properly.
- Perform routine preventive maintenance to ensure heavy equipment and vehicles are operating optimally.
- Recycle or dispose of waste properly and promptly.
- Conduct all body repair and painting work indoors.
- Minimize waste from paints and thinners. Calculate paint needs based on surface area.
- Do not wash or hose down storage areas unless there is prior approval to collect and discharge the water into the sanitary sewer. Use dry cleanup methods (vacuum, sweep) to clean up metal

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filings and dust and paint chips from grinding, shaving and sanding. Sweep debris from wet sanding after allowing it to dry overnight on the shop floor. Dispose of waste properly; never dump waste into storm or sanitary sewers.

- Do not dump any liquids or other materials outside, especially near or in storm drains or ditches.
- Store materials and waste in labeled containers under cover and in secondary containment.
- Chemicals should not be combined in containers.
- Carefully transfer collected fluids from containers into designated storage areas as soon as possible.
- Waste liquids (oil, antifreeze, etc.) should be properly stored on-site and routinely disposed by licensed waste haulers at licensed disposal facilities.
- Store new and used batteries securely to avoid breakage. Store indoors or in secondary containment to contain potential acid leaks. Recycle used batteries.

Parts Cleaning

Cleaning of parts can transport pollutants into the storm drain system or surface waters. The MS4 Permit does not authorize these types of discharges. Best management practices to avoid this include the following:

- Use designated areas for engine, parts, or radiator cleaning. Do not wash or rinse parts outdoors. If parts cleaning equipment is not available, then capture parts cleaning fluids.
- Recycle cleaning solution. Never discharge waste to the sanitary sewer or storm sewer.
- Use steam cleaning or pressure washing of parts instead of solvent cleaning. Cleaning equipment must be connected to an oil/water interceptor prior entering the sanitary sewer.
- When using solvents for cleaning, drain parts over the solvent tank to avoid drips to the floor. Catch excess solutions and divert them back to tank. Allow parts to dry over the hot tank.

Vehicle and Equipment Wash Waters

Washing down of maintenance and fueling areas, as well as equipment and vehicles can transport pollutants into the storm drain system or surface waters. The MS4 Permit does not authorize these types of discharges. Best management practices to ensure that vehicle wash waters are not discharged to the municipal system or surface waters include the following:

- Vehicles and equipment should be washed inside whenever possible to reduce runoff to the stormwater system.
- Grassy and pervious (porous) surfaces may be used to promote direct infiltration of wash water, providing treatment before recharging groundwater and minimizing runoff to an adjacent stormwater system. Pervious surfaces or other infiltration-based systems should not be used within wellhead protection areas or within other protected resources.
- Avoid discharge of any wash water directly to the storm drainage system or surface water (e.g., stream, pond, or drainage swale)
- Do not use solvents except in dedicated solvent parts washer systems.
- Wash vehicles with non-toxic, phosphate-free, biodegradable cleaners
- Wash vehicles on an asphalt lot using a collection system with containment berms and discharge to water quality devices that will remove pollutants. Detergents should not be used in areas where oil/water separators provide pre-treatment of drainage.
- Floor drains should be connected to a sanitary sewer or tight tank. Floor drains discharging to adjacent surface water bodies or engineered storm drain systems should be permanently plugged or otherwise abandoned before any vehicle wash activities are completed.
- Designate separate areas for routine maintenance and vehicle cleaning. This helps prevent contamination of wash water by motor oils, hydraulic lubricants, greases, or other chemicals.

Earth Material Stockpile Areas

Stockpiling material on the site may be needed temporarily or permanently depending on the time or year or town projects. BMPs for protecting stockpiles include adequate cover or temporary stabilization as well as temporary sediment perimeter controls at the base of the stockpile.

- Divert stormwater runoff around stockpile areas.
- Cover stockpiles with plastic, geotextile or temporary seed.
- Temporary sediment perimeter controls, including silt fence, filters socks, or fiber rolls, may be placed a short distance from the base of the stockpile. Maintaining a short distance from the base of the stockpile to the perimeter control is important as it allows water to pond, if needed.

4.2 GOOD HOUSEKEEPING

All exposed areas that are potential sources of pollutants, shall be kept clean using such measures as sweeping at regular intervals. Ensure that trash containers are closed when not in use, keep storage areas well swept and free from leaking or damaged containers; and store leaking vehicles needing repair indoors.

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Sweeping and Cleaning of Parking Lots

Vehicle surfaces can collect a variety of contaminants such as sediments, oil, grease, and metals during daily activities. The MS4 permit requires that parking lots are swept, and surrounding areas of the facility are kept clean to reduce runoff of pollutants.

Parking lot sweeping and cleaning follows the same schedule as street sweeping, at least twice per year in Spring and Fall, with additional sweeping as need for specific sites.

Waste Management

All liquid and solid waste must be disposed of properly. Some of the most common sources of pollution at municipal facilities are a result of littering, improper collection of debris, and improper disposal of solid or liquid waste. Best management practices for handling, storage, transfer and disposal of trash and recyclables include the following:

- All waste and recycling receptacles must be leak-tight with tight-fitting lids or covers.
- Keep lids on dumpsters and containers closed at all times unless adding or removing material. If using an open-top roll-off dumpster, cover it and tie it down with a tarp unless adding materials.
- Place waste or recycling receptacles indoors or under a roof or overhang whenever possible.
- Locate dumpsters on a flat, paved surface and install berms or curbs around the storage area to prevent run-on and run-off.
- Do not locate dumpsters over or adjacent to catch basins.
- Prior to transporting waste, trash, or recycling, ensure that containers are not leaking (double bag if needed) and properly secure containers to the vehicle.
- Clean up any liquid leaks or spills with dry cleanup methods.
- Arrange for waste or recycling to be picked up regularly and disposed of at approved disposal facilities.
- Never place hazardous materials, liquids, or liquid-containing wastes in a dumpster or recycling or trash container.
- Do not wash trash or recycling containers outdoors or in parking lots.
- Conduct periodic inspections of solid and liquid waste storage areas to check for leaks and spills.
- Conduct periodic inspections of work areas to ensure that all wastes are being disposed of properly.
- In dumpster areas, regularly pick up surrounding trash and debris and regularly sweep the area.
- In compactor areas, regularly check the hydraulic fluid hoses and reservoir to ensure that there are no cracks or leaks. Regularly sweep the area.

4.3 PREVENTATIVE MAINTENANCE

All equipment and systems shall be regularly inspected, tested, maintained, and repaired to avoid situations that may result in leaks, spills, and other releases of pollutants to stormwater and receiving waters. Inspections shall occur at a minimum once per quarter.

Use Storage and Disposal of Potential Pollutants

Potential pollutants or hazardous wastes that may be used and stored in or around municipal building and facilities include pesticides, paints, cleaners, petroleum products, fertilizers, and solvents. Careful handling and proper storage of these products are the best means of preventing spills and pollution to the environment. Best management practices include the following:

- Storage and handling areas should be covered or enclosed to reduce potential contact with stormwater and wind.
- Potential pollutants should be transported using approved methods and containers to minimize the chance of spillage, and by employees that have familiarity with the potential environmental and human health hazards of the products.
- Proper spill kits applicable to the products being used at each specific building or facility should be easily accessible and marked clearly so employees can follow procedures quickly and effectively. Leaks or spills should be cleaned up in a timely manner.
- Establish separate storage areas for these types of products with measures in place to contain any spill leaking out of the storage area.
- A designated person should be responsible for these areas.
- The storage area should be inspected frequently, kept clean and in good order with proper labels and signs, and consistent disposal practices.
- Floor drains in storage areas should be disconnected from the stormwater system.
- Routinely inspect buildings and facilities for areas of potential leaks.
- Paint and other chemicals should not be applied on the outside of buildings when it is raining or prior to expected rain.
- When sanding, painting, power washing, etc., ensure that sites are properly prepared (e.g., use tarps) and cleaned (e.g., use dry cleaning methods) especially if they are near storm drains. Protect catch basins when maintenance work is conducted upgradient of them.
- When painting, use a drop cloth and clean up any spills immediately.
- Do not leave open containers on the ground where they may accidentally tip over.
- Do not discharge chlorinated pool water into the stormwater system. Water must be properly dechlorinated and tested before it is discharged.
- Ensure that the washwater does not flow into the storm system. Containment or filtering systems should be provided.

4.4 SPILL PREVENTION AND RESPONSE

The permittee shall minimize the potential for leaks, spills, and other releases that may be exposed to stormwater and develop plans for effective response to such spills if or when they occur. At a minimum, the permittee shall have procedures that include:

- Preventive measures such as barriers between material storage and traffic areas, secondary containment provisions, and procedures for material storage and handling.

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- Response procedures that include notification of appropriate facility personnel, emergency agencies, and regulatory agencies, and procedures for stopping, containing, and cleaning up leaks, spills and other releases. Measures for cleaning up hazardous material spills or leaks shall be consistent with applicable Resource Conservation and Recovery Act (RCRA) regulations at 40 CFR section 264 and 40 CFR section 265. Employees who may cause, detect, or respond to a spill or leak shall be trained in these procedures and have necessary spill response equipment available. If possible, one of these individuals should be a member of the Pollution Prevention Team; and
- Contact information for individuals and agencies that shall be notified in the event of a leak, spill, or other release. Where a leak, spill, or other release containing a hazardous substance or oil in an amount equal to or in excess of a reportable quantity established under 40 CFR section 110, 40 CFR section 117, or 40 CFR section 302, occurs during a 24-hour period, the permittee shall notify the National Response Center (NRC) at (800) 424-8802 in accordance with the requirements of 40 CFR section 110, 40 CFR section 117, and 40 CFR section 302 as soon as the permittee has knowledge of the discharge. State or local requirements may necessitate reporting spills or discharges to local emergency, public health or drinking water supply agencies, and owners of public drinking water supplies. Contact information shall be in locations that are readily accessible and available.

Spill Prevention Plans

The Town has spill kits and prevention and control plans in place for all buildings and facilities where hazardous wastes are stored or used. These are coordinated with the fire department as necessary.

Per the Massachusetts Clean Water Toolkit Fact Sheet for Spill Prevention and Control Plans, it is recommended that Spill Prevention and Control Plans (SPCP) clearly state measures to stop the source of a spill, contain the spill, clean up the spill, dispose of contaminated materials, and train personnel to prevent and control future spills. The SPCP should define material handling procedures and storage requirements and outline actions necessary to reduce spill potential and impacts on stormwater quality. The plan can be a procedural handbook, or a poster placed in several locations at the site.

4.5 EROSION AND SEDIMENT CONTROL

Structural and non-structural control measures shall be used at the facility to stabilize and contain runoff from exposed areas and to minimize or eliminate onsite erosion and sedimentation. Efforts to achieve this may include the use of flow velocity dissipation devices at discharge locations and within outfall channels where necessary to reduce erosion.

Erosion Control

Site maintenance activities include erosion control, specifically with respect to poor vegetation cover and particularly within 50 feet of surface water. Best management practices include the following:

- Prevention of erosion and sedimentation is preferable to installing treatments devices.
- Protect vegetated and wooded buffers and leave vegetated areas undisturbed to the extent possible.
- Inspect sites regularly for locations of poor vegetation cover, erosion and sedimentation and channelization. If stabilization is required, corrective actions should be identified and implemented as soon as possible.

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- If exposed, soils should be stabilized by mulching, seeding with fast-growing native grass and/or planted with native tree and shrubs. Use erosion control blankets when seeding slopes.
- If necessary, slow stormwater runoff velocities with conveyance measures such as riprap channels or vegetated swales, check dams, level spreaders and outlet protection, etc.
- A buffer/filter strip should be left around surface waters. No fertilizers or pesticides should be applied in the buffer/filter strip except where necessary.

4.6 MANAGEMENT OF RUNOFF

The permittee shall manage stormwater runoff from the facility to prevent or reduce the discharge of pollutants. This may include management practices which divert runoff from areas that are potential sources of pollutants, contain runoff in such areas, or reuse, infiltrate or treat stormwater to reduce the discharge of pollutants.

Catch Basin Cleaning Program

All catch basins on the site are to be included in the catch basin inspection and cleaning optimization program.

Stormwater Management BMP Maintenance

Stormwater BMPs for this facility (excluding catch basins) are to be inspected quarterly and maintained as necessary to provide optimum treatment of stormwater runoff. The Town will keep a log of stormwater management structures inspected and report on the condition and maintenance performed. BMPs are included in the SWPPP inspection form provided in **Appendix D**.

The following are maintenance activities and procedures for each type of BMP on the site based on the Massachusetts Stormwater Handbook:

Infiltration BMPs

DETENTION BASINS

A detention basin is an impoundment or excavated basin for the short-term detention of stormwater runoff that allows a controlled release using an outlet pipe near the invert of the basin. Typically, a pretreatment device (sediment forebay) is installed prior to the detention basin to prevent clogging. Inspection and maintenance should include the following:

- Inspect the basin after every major storm to ensure detention time of stormwater is as designed.
- Inspect four times a year during quarterly SWPPP inspections for erosion, vegetation/tree growth, emergency spillway functionality, sediment accumulation, and outlet clogging.
- Sediment depth posts are installed to a height of two feet above the bottom of the forebay with black painted markings every three inches. Remove sediment from basin when it has accumulated in excess of 6-inches. Removal may be by hand with shovels, by vacuor truck or with town equipment as appropriate. Removed sediment can be combined with street sweeping or catchbasin cleanings disposal.
- Mow side slopes, embankments, and emergency spillways shall be mowed at least twice per year. Remove trash and debris at this time.

INFILTRATION BASINS

Infiltration basins are stormwater runoff impoundments that are constructed over permeable soils to infiltrate stormwater runoff. Pretreatment (sediment forebay) is critical for effective performance of infiltration basins. Runoff from the design storm is stored until it exfiltrates through the soil of the basin floor. Inspection and maintenance should include the following:

- Inspect the basin after major storms and note whether it is empty within 72 hours.
- Inspect four times a year during quarterly SWPPP inspections for settlement, cracking, erosion, vegetation/tree growth, emergency spillway functionality, sediment accumulation, condition of riprap and outlet control structure for clogging.
- Sediment depth posts are installed to a height of two feet above the bottom of the basin with black painted markings every three inches. When sediment has accumulated in excess of 6-inches, basin need to be cleaned. Remove sediment when the basin floor is thoroughly dry using light equipment to remove top layer so as not to compact underlying soil. Removed sediment can be combined with street sweeping or catchbasin cleanings disposal. Deeply till the remaining soil and revegetate as soon as possible.
- All upper-stage side slopes, embankments, and emergency spillways shall be mowed at least twice per year. Remove grass clippings and accumulated organic material as well as trash and debris. Use deep tilling to break up clogged surfaces as needed and revegetate immediately.

SEDIMENT FOREBAYS

Sediment forebays are used to decrease the rate of stormwater runoff as well as settle out particulates from the storm event. Inspection and maintenance should include the following:

- Inspect for sediment accumulation four times a year during quarterly SWPPP inspections. Sediment depth posts are installed to a height of two feet above the bottom of the forebay with black painted markings every three inches. When sediment has accumulated in excess of 6-inches, forebays need to be cleaned. Removal may be by hand with shovels, by vacuum truck or with town equipment as appropriate. Removed sediment can be combined with street sweeping or catchbasin cleanings disposal.
- Check for vegetative health, rilling, gullyng and do not allow grass height to exceed 6 inches (maintain a height of 3 to 4 inches)
- Following sediment removal, reseeding or replacement of riprap may be required to repair damaged areas

Other BMPs

STONE CHIP OR GRAVEL DRIVEWAYS AND PARKING AREAS

Stone chip or gravel surfaces allows parking lot, driveway and/or roadway runoff to infiltrate directly into the soil. They need to be designed and constructed with a base similar to a traditional road in order to prevent ponding of water and washout. Inspection should be conducted annually, and maintenance as needed including the following:

- Inspect the surface annually for deterioration and assess exfiltration capacity- monitor after a storm to ensure the surface drains properly without ponding
- Remove debris (leaves, sticks, weeds, etc.) on a weekly basis

- Regrade surface for proper drainage and add new stone/gravel where necessary to fill holes and ruts

Apply a fresh layer of gravel to the surface every 1-2 years

Additional guidance for Structural BMP operations and maintenance can be found in the latest version of the Massachusetts Department of Environmental Protection Stormwater Handbook, Volume 2, Chapter 2, located at: <http://www.mass.gov/eea/docs/dep/water/laws/i-thru-z/v2c2.pdf>

4.7 SALT STORAGE PILES OR PILES CONTAINING SALT

For storage piles of salt or piles containing salt used for deicing or other purposes (including maintenance of paved surfaces) for which the discharge during precipitation events discharges to the permittee's MS4, any other storm sewer system, or to a Water of the US, the permittee shall prevent exposure of the storage pile to precipitation by enclosing or covering the storage piles. As of July 1, 2020, such piles shall be enclosed or covered. The permittee shall implement appropriate measures (e.g., good housekeeping, diversions, containment) to minimize exposure resulting from adding to or removing materials from the pile. The permittee is encouraged to store piles in such a manner as not to impact surface water resources, ground water resources, recharge areas, and wells.

4.8 EMPLOYEE TRAINING

The permittee shall regularly train employees who work in areas where materials or activities are exposed to stormwater, or who are responsible for implementing activities identified in the SWPPP (e.g., inspectors, maintenance personnel), including all members of the Pollution Prevention Team. Training shall cover both the specific components and scope of the SWPPP, and the control measures required under this part, including spill response, good housekeeping, material management practices, any best management practice operation and maintenance, etc. EPA recommends annual training.

The permittee shall document the following information for each training:

- The training date, title and training duration
- List of municipal attendees
- Subjects covered during training

4.9 MAINTENANCE OF CONTROL MEASURES

The permittee shall maintain all control measures, required by the permit in effective operating condition. The permittee shall keep documentation onsite that describes procedures and a regular schedule for preventative maintenance of all control measures and discussions of back-up practices in place should a runoff event occur while a control measure is off-line. Nonstructural control measures shall also be diligently maintained (e.g., spill response supplies available, personnel trained).

5.0 SITE INSPECTIONS

Inspect all areas that are exposed to stormwater and all stormwater control measures. Inspections shall be conducted at least once each calendar quarter (winter, spring, summer and fall). The quarters begin on January 1, April 1, July 1 and October 1. More frequent inspections may be required if significant activities are exposed to stormwater. Inspections shall be performed when the facility is in operation. At least one of the quarterly inspections shall occur during a period when a stormwater discharge is occurring.

The permittee shall document the following information for each facility inspection:

- The inspection date and time
- The name of the inspector
- Weather information and a description of any discharge occurring at the time of the inspection
- Identification of any previously unidentified discharges from the site
- Any control measures needing maintenance or repair
- Any failed control measures that need replacement
- Any SWPPP changes required as a result of the inspection

If during the inspections, or any other time, the permittee identifies control measures that need repair or are not operating effectively, the permittee shall repair or replace them before the next anticipated storm event if possible, or as soon as practicable following that storm event. In the interim, the permittee shall have back-up measures in place.

A SWPPP inspection form is provided in **Appendix D**. The permittee shall report the findings from the Site Inspections in the annual report.

6.0 RECOMMENDATIONS

Based on BETA's February 11, 2021 site visit, we are providing the following recommendations to attain or maintain compliance with the MS4 permit requirements.

1. The current heavy equipment fueling area is uncovered. Petroleum is a potential stormwater pollutant and releases during vehicle fueling may enter the storm drain if occurring during a rain event. Good housekeeping practices can manage pollutants for fuel areas in the short-term. We recommend that a cover or roof structure be installed over the vehicle fueling area to mitigate potential stormwater pollutants from entering the storm drainage system as a long-term solution.
2. Current vehicle washing at the site results in washwater discharge directly to the stormwater drainage system at the site. Where the system is treated through water quality BMPs (sediment forebays and infiltration systems) this is acceptable however discharge to the drainage system where it outfalls directly to the resource area is not authorized under the MS4 permit. We recommend one or more of the following be performed to eliminate this discharge:
 - a. Ensure that washing is conducted in appropriate locations.
 - b. Construct a wash rack to collect and discharge wash waters to the sanitary sewer system (with authorization from the local sewer authority) via water quality system such as an oil/water or grit separator.
 - c. Procure 3rd party vehicle washing services. These operations are equipped to handle fleet vehicle washing and resulting wash water. This would eliminate the discharge of wash water to the storm drain system at the site.
3. In order to address the concerns of items 1-2 noted above, the Town may consider installing water quality units at key locations or re-routing drainage to treat all of the stormwater on the site and/or replace select catch basins with stormwater treatment devices.
4. Remove trash build-up along the eastern property boundary to prevent direct discharge into the nearby wetlands.

APPENDIX A – Site Map

APPENDIX B – Vehicle Inventory

APPENDIX C – Activities & Material Storage

APPENDIX D – SWPPP Inspection Form
