

# **Stormwater Management Program (SWMP)**

Town of Dunstable

511 Main Street    MA    01827

EPA NPDES Permit Number MAR 041242

# Certification

**Authorized Representative (Optional):** All reports, including SWPPPs, inspection reports, annual reports, monitoring reports, reports on training and other information required by this permit must be signed by a person described in Appendix B, Subsection 11.A or by a duly authorized representative of that person in accordance with Appendix B, Subsection 11.B. If there is an authorized representative to sign MS4 reports, there must be a signed and dated written authorization.

The authorization letter is:

- Attached to this document (document name listed below)

Signed Delegation of Authority and Notice of Intent pending approval.

- Publicly available at the website below

Upon approval will be located on <https://www.dunstable-ma.gov/>

“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.”

Printed Name

Signature \_\_\_\_\_

Date

[Click Here for Revisions](#)

# Background

## Stormwater Regulation

The Stormwater Phase II Final Rule was promulgated in 1999 and was the next step after the 1987 Phase I Rule in EPA's effort to preserve, protect, and improve the Nation's water resources from polluted stormwater runoff. The Phase II program expands the Phase I program by requiring additional operators of MS4s in urbanized areas and operators of small construction sites, through the use of NPDES permits, to implement programs and practices to control polluted stormwater runoff. Phase II is intended to further reduce adverse impacts to water quality and aquatic habitat by instituting the use of controls on the unregulated sources of stormwater discharges that have the greatest likelihood of causing continued environmental degradation. Under the Phase II rule all MS4s with stormwater discharges from Census designated Urbanized Area are required to seek NPDES permit coverage for those stormwater discharges.

## Permit Program Background

On May 1, 2003, EPA Region 1 issued its Final General Permit for Stormwater Discharges from Small Municipal Separate Storm Sewer Systems (2003 small MS4 permit) consistent with the Phase II rule. The 2003 small MS4 permit covered "traditional" (i.e., cities and towns) and "non-traditional" (i.e., Federal and state agencies) MS4 Operators located in the states of Massachusetts and New Hampshire. This permit expired on May 1, 2008 but remained in effect until operators were authorized under the 2016 MS4 general permit, which became effective on July 1, 2018.

## Stormwater Management Program (SWMP)

The SWMP describes and details the activities and measures that will be implemented to meet the terms and conditions of the permit. The SWMP accurately describes the permittees plans and activities. The document should be updated and/or modified during the permit term as the permittee's activities are modified, changed or updated to meet permit conditions during the permit term. The main elements of the stormwater management program are (1) a public education program in order to affect public behavior causing stormwater pollution, (2) an opportunity for the public to participate and provide comments on the stormwater program (3) a program to effectively find and eliminate illicit discharges within the MS4 (4) a program to effectively control construction site stormwater discharges to the MS4 (5) a program to ensure that stormwater from development projects entering the MS4 is adequately controlled by the construction of stormwater controls, and (6) a good housekeeping program to ensure that stormwater pollution sources on municipal properties and from municipal operations are minimized.

## Town Specific MS4 Background (optional)

The Town of Dunstable is a new permittee with a regulated population of 1057 according to the 2010 census. There are six urbanized areas sporadically located throughout the town as most of the area is agricultural and undeveloped.

# Small MS4 Authorization

The NOI was submitted on

The NOI can be found at the following (document name or web address):

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Authorization to Discharge was granted on

The Authorization Letter can be found (document name or web address):

# Stormwater Management Program Team

## SWMP Team Coordinator

Name	Brian M. Palaia	Title	Town Administrator
Department	Town Administrator		
Phone Number	(978) 649-4514 Ext. 224	Email	bpalaia@dunstable-ma.gov
Responsibilities	The Town Administrator is responsible for coordinating and implementing the requirements under the NPDES MS4 Permit.		

## SWMP Team

Name	David Tully	Title	Highway Department Supervisor
Department	Highway Department		
Phone Number	(978) 649-4514 Ext. 227	Email	
Responsibilities	The Highway Department Supervisor is responsible for assisting with the tasks necessary under Minimum Control Measures (MCM) 3 (Illicit Discharge Detection and Elimination (IDDE)) and 6 (Municipal Good Housekeeping and Pollution Prevention).		

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Name	Dana E. Barnes	Title	Building Inspector
Department	Inspections		
Phone Number	(978) 649-4514 Ext. 226	Email	
Responsibilities	The Building Inspector is responsible for assisting with the tasks necessary under MCM 3 (IDDE) .		

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Name	Jim Dow	Title	Plumbing / Gas Inspector
Department	Inspections		
Phone Number	(978) 649-6123	Email	
Responsibilities	The Plumbing Inspector is responsible for assisting with the tasks necessary under MCM 3 (IDDE) .		

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Name	Jeffrey Rider	Title	Town Engineer
Department	Town Administrator		
Phone Number	(978) 649-4514	Email	bpalaia@dunstable-ma.gov
Responsibilities	The Town Engineer is responsible for assisting with the tasks necessary under MCM 3 (IDDE), MCM 4 (Construction Site Stormwater Runoff Control) and MCM 5 (Post-Construction Stormwater Management).		

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Name	Maria Amodei	Title	Chair of Board of Health
Department	Board of Health		
Phone Number	(978) 649-4514 Ext. 229	Email	
Responsibilities	The Board of Health is responsible for assisting with the tasks necessary under MCM 3 (IDDE).		

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Name	Michael Knight	Title	Facilities
Department	Swallow Union Elementary School		
Phone Number	978-649-7281	Email	
Responsibilities	School facilities will be responsible for O&M on the school property as indicated under MCM 6 (Municipal Good Housekeeping and Pollution Prevention).		

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**Add SWMP Member**

# Receiving Waters

The following table lists all receiving waters, impairments and number of outfalls discharging to each waterbody segment.

OR

The information can be found in the following document or at the following web address:

Waterbody segment that receives flow from the MS4	Number of outfalls into receiving water segment	Chloride	Chlorophyll-a	Dissolved Oxygen/DO Saturation	Nitrogen	Oil & Grease/PAH	Phosphorus	Solids/ TSS/ Turbidity	E. coli	Enterococcus	Other pollutant(s) causing impairments
Joint Grass Brook		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Salmon Brook	11	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Massapoag Pond		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Mercury in fish tissue, non-native aquatic plants, aquatic plants (macrophytes)
Nashua River	7	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Aquatic macroinvertebrate bioassessments
Hauk Brook		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Unkety Brook		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Black Brook		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
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		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

[Click here to lengthen table](#)



# Eligibility: Endangered Species and Historic Properties

\*Reminder: The proper consultations and updates to the SWMP must be conducted for construction projects related to your permit compliance where Construction General Permit (CGP) coverage, which requires its own endangered species and history preservation determination, is NOT being obtained.

## Attachments:

- The results of Appendix C U.S. Fish and Wildlife Service endangered species screening determination
- The results of the Appendix D historic property screening investigations
- If applicable, any documents from the State Historic Preservation Officer (SHPO), Tribal Historic Preservation Officer (THPO), or other Tribal representative to mitigate effects

These attachments are required within one year of the permit effective date and are:

- Attached to this document (document names listed below)

NOI and the letter from U.S. Fish and Wildlife Services

- Publicly available at the website listed below

<https://www.dunstable-ma.gov/>

Under what criterion did permittee determine eligibility for ESA?

- Criterion A
- Criterion B
- Criterion C

Under what criterion did permittee determine eligibility for Historic Properties?

- Criterion A
- Criterion B
- Criterion C
- Criterion D (NH only)

Below add any additional measures for structural controls that you're required to do through consultation with U.S. Fish and Wildlife Service (if applicable):

Below add any additional measures taken to avoid or minimize adverse impacts on places listed, or eligible for listing, on the NRHP, including any conditions imposed by the SHPO or THPO (if applicable):

# MCM 1

## Public Education and Outreach

Permit Part 2.3.2

**Objective:** The permittee shall implement an education program that includes educational goals based on stormwater issues of significance within the MS4 area. The ultimate objective of a public education program is to increase knowledge and change behavior of the public so that the pollutants in stormwater are reduced.

**Examples and Templates:**

[EPA's Stormwater Education Toolbox](#)

[MassDEP's Stormwater Outreach Materials](#)

Other templates relevant to MCM 1 can be found here: <https://www.epa.gov/npdes-permits/stormwater-tools-new-england#peo>

**BMP: Local Public Service Announcements**

**BMP Number (Optional) MCM 1-1**

**Document Name and/or Web Address:** Fertilizer Ad and Dog Waste Ad  
[http://www.nmstormwater.org/Websites/nmcleanwaters/files/Content/4627583/Fertilizer\\_Ad\\_Think\\_Blue\\_MA.pdf](http://www.nmstormwater.org/Websites/nmcleanwaters/files/Content/4627583/Fertilizer_Ad_Think_Blue_MA.pdf)  
[http://www.nmstormwater.org/Websites/nmcleanwaters/files/Content/4627515/Dog\\_Waste\\_Think\\_Blue\\_MA.pdf](http://www.nmstormwater.org/Websites/nmcleanwaters/files/Content/4627515/Dog_Waste_Think_Blue_MA.pdf)  
  
The think Blue Campaign <https://www.thinkbluemassachusetts.org> may be used in addition.

**Description:**

As a new permittee, one message is required to the audience over the permit term. BMP: MCM 1-1 will broadcast the messages as shown on the weblinks listed above. These messages will play in a rotation prior to Board of Selectman, Planning Board, Board of Health and Conservation meetings broadcasted on public television. This will allow residents to be educated via public broadcasting from the comfort of their home prior to the public meetings.

**Targeted Audience:** Residents

**Responsible Department/Parties:** Town Administrator's office

**Measurable Goal(s):**

Residents will have the opportunity to absorb the information and ask the town clarification if need be. A survey asking relevant questions regarding these Ad's will be distributed at the Annual Town Meeting and collected. This will be completed annually during the permit period and the data will be reviewed to compare if the answers changed over the course of the five year permit period. Based on the results, the Town will know if this was an effective way to educate the public. The Think Blue campaign has surveys on their website that may be used to alternate with the Annual Town Meeting surveys. This website has the ability to report the number of hits visited their website.

**Message Date(s):** These ads will be played prior to the public broadcast of public meetings beginning in 2019. Data collection will occur annually at Town Meeting in May of the next year or with the Think Blue campaign through Northern Middlesex Stormwater Coalition.

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**BMP: Brochures/Pamphlets**

**BMP Number (Optional) MCM 1-2**

**Document Name and/or Web Address:** Stormwater Management for small businesses brochure  
<https://www.mass.gov/doc/stormwater-management-for-small-businesses>

**Description:**

As a new permittee, one message is required to this audience over the permit term. BMP: MCM 1-2 is an

educational brochure conveying a message targeting the importance of proper parking lot management and other important property maintenance tips.

**Targeted Audience:** Businesses, institutions and commercial facilities

**Responsible Department/Parties:** Town Administrator's office

**Measurable Goal(s):**

Allow businesses to review materials and ask the Town questions if needed. The Town will report the number of businesses that received the educational materials for review.

**Message Date(s):** This will be distributed year 2020 to businesses.

**BMP: Meeting**

**BMP Number (Optional)** MCM 1-3

**Document Name and/or Web Address:** Stormwater Management Bylaw and Rules and Regulations for Construction Site Stormwater Runoff Control

**Description:**

As a new permittee, one message is required to this audience over the permit term. A public meeting will be held for the local developers in regards to the new Stormwater Management Bylaw and Rules and Regulations for Construction Site Stormwater Runoff Control.

**Targeted Audience:** Developers (construction)

**Responsible Department/Parties:** Town Administrator's office

**Measurable Goal(s):**

Invite local developers for a presentation on the Stormwater Management Rules and Regulations and Bylaw and provide time for a question session. The meeting will conclude with a survey in which the results will determine if the MCM 1-3 message was conveyed during the meeting and effective.

**Message Date(s):** This public meeting will be held in 2022.

**BMP: Brochure/Pamphlets**

**BMP Number (Optional)** MCM 1-4

**Document Name and/or Web Address:** Grass Clipping and Fertilizers: <https://www.mass.gov/doc/be-a-beneficial-lake-effect-protecting-your-lake-or-pond-from-stormwater-pollution>

Pet Waste Management: <https://www.mass.gov/doc/dog-waste-and->

surface-water-quality

Proper disposal leaf litter: [http://www.nmstormwater.org/Websites/nmcleanwaters/files/Content/4588023/Natural\\_Yard\\_Care\\_Guide.pdf](http://www.nmstormwater.org/Websites/nmcleanwaters/files/Content/4588023/Natural_Yard_Care_Guide.pdf)

**Description:**

Due to Appendix H requirements, the Town of Dunstable will supplement its program with annual timed messages on specific topics. These educational brochures/pamphlets will be distributed in the spring (March/April) on grass clippings and phosphorous-free fertilizers, in the summer (June/July) on pet waste management, and in the Fall (Sept/Oct) on proper disposal leaf litter. Distribution will be carried out through mailing and keeping brochures/pamphlets available in public building locations for viewing and distribution such as the Town Hall and Library.

**Targeted Audience:** Residents

**Responsible Department/Parties:** Town Administrator's office

**Measurable Goal(s):**

Allow residents to review materials and ask the Town questions if needed. A survey will be distributed at 2021 Annual Town Meeting. Based on the data provided from the surveys, the Town will know if this MCM 1-4 was effective.

**Message Date(s):** NOI states 2019 but the Town will conduct this task in 2020 to allow the full year cycle for educational purposes.

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**BMP:Newspaper Article/Press Releases**

**BMP Number (Optional)** MCM 1-5

**Document Name and/or Web Address:** The Newspaper Article/Press Release will be a more condensed version of what is provided below making it more applicable for the publication.

Grass Clipping and Fertilizers: <https://www.mass.gov/doc/beneficial-lake-effect-protecting-your-lake-or-pond-from-stormwater-pollution>

Pet Waste Management: <https://www.mass.gov/doc/dog-waste-and-surface-water-quality>

Proper disposal leaf litter: [http://www.nmstormwater.org/Websites/nmcleanwaters/files/Content/4588023/Natural\\_Yard\\_Care\\_Guide.pdf](http://www.nmstormwater.org/Websites/nmcleanwaters/files/Content/4588023/Natural_Yard_Care_Guide.pdf)

**Description:**

Due to Appendix H requirements, the Town of Dunstable will supplement its program with annual timed messages on specific topics. These Newspaper articles/Press Releases will be distributed in the spring (March/April) on grass clippings and phosphorous-free fertilizers, in the summer (June/July) on pet waste management,

and in the Fall (Sept/Oct) on proper disposal leaf litter.

**Targeted Audience:** Businesses, institutions and commercial facilities

**Responsible Department/Parties:** Town Administrator's office

**Measurable Goal(s):**

Allow Businesses to review materials and ask the Town questions if needed. The Town will report the number businesses it has delivered the educational materials.

**Message Date(s):** NOI states 2019 but the Town will conduct this task in 2020 to allow the full year cycle for educational purposes.

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**BMP:** [BMP name here]

**BMP Number (Optional)** \_\_\_\_\_

**Document Name and/or Web Address:** \_\_\_\_\_

**Description:**

\_\_\_\_\_

**Targeted Audience:** Industrial facilities

**Responsible Department/Parties:** \_\_\_\_\_

**Measurable Goal(s):**

\_\_\_\_\_

**Message Date(s):** \_\_\_\_\_

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**BMP:** [BMP name here]

**BMP Number (Optional)** \_\_\_\_\_

**Document Name and/or Web Address:** \_\_\_\_\_

**Description:**

\_\_\_\_\_

**Targeted Audience:** Residents

**Responsible Department/Parties:** \_\_\_\_\_

**Measurable Goal(s):**

**Message Date(s):**

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**BMP:[BMP name here]**

**BMP Number (Optional)** \_\_\_\_\_

**Document Name and/or Web Address:**

**Description:**

**Targeted Audience:**

**Responsible Department/Parties:**

**Measurable Goal(s):**

**Message Date(s):**

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**Add BMP**

**MCM 2**  
**Public Involvement and Participation**  
Permit Part 2.3.3

**Objective:** The permittee shall provide opportunities to engage the public to participate in the review and implementation of the permittee's SWMP.



**BMP: Public Review of Stormwater Management Program**

**BMP Number (Optional)** MCM 2-1

**Location of Plan and/or Web Address:**

**Responsible Department/Parties:**

**Measurable Goal(s):**

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**BMP: Public Participation in Stormwater Management Program Development**

**BMP Number (Optional)** MCM 2-2

**Description:**

**Responsible Department/Parties:**

**Measurable Goal(s):**

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**BMP: Public Participation for reporting problems/violations**

**BMP Number (Optional)** MCM 2-3

**Document Name and/or Web Address:**

**Description:**

**Responsible Department/Parties:**

**Measurable Goal(s):**

**BMP: Public Review of Annual Report**

**BMP Number (Optional)** MCM 2-4

**Document Name and/or Web Address:**

**Description:**

**Responsible Department/Parties:**

**Measurable Goal(s):**

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**BMP: Public Participation- Stormwater Committee/Task Force**

**BMP Number (Optional)** MCM 2-5

**Document Name and/or Web Address:**

**Description:**

**Responsible Department/Parties:**

**Measurable Goal(s):**

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**BMP: Public Participation - Public Meeting**

**BMP Number (Optional)** MCM 2-6

**Document Name and/or Web Address:**

**Description:**

**Responsible Department/Parties:**

**Measurable Goal(s):**

A public meeting is held in 2021. (Revised 8/3/21 - Due to COVID - this meeting will need to take place in 2022 pending pandemic status)

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**BMP: Public Participation - Clean-ups - Roadside/General**

**BMP Number (Optional)** MCM 2-7

**Document Name and/or Web Address:** <https://www.dunstable-ma.gov>

**Description:**

The Town will host a clean-up day on Earth Day with Stormwater Committee members.

**Responsible Department/Parties:** Town Administrator's office

**Measurable Goal(s):**

A clean-up day is held in 2022.

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Add BMP

# MCM 3

## Illicit Discharge Detection and Elimination (IDDE) Program

Permit Part 2.3.4

**Objective:** The permittee shall implement an IDDE program to systematically find and eliminate illicit sources of non-stormwater discharges to its municipal separate storm sewer system and implement procedures to prevent such discharges.

**Examples and Templates:**

IDDE Program Template and SOPs

Other templates relevant to IDDE can be found here: <https://www.epa.gov/npdes-permits/stormwater-tools-new-england#idde>

**BMP: IDDE Legal Authority**

BMP Number (Optional) MCM 3-1

Completed (by year 3)

Ordinances Link or Reference: <https://www.dunstable-ma.gov/sites/dunstablema/files/uploads/general.pdf>

Department Responsible for Enforcement: Board of Health/Highway Department

**BMP: Sanitary Sewer Overflow (SSO) Inventory**

BMP Number (Optional) \_\_\_\_\_

Completed (by year 4)

Document Name and/or Web Address: \_\_\_\_\_

**Description:**

Not Applicable in the Town of Dunstable.

Responsible Department/Parties: \_\_\_\_\_

**Measurable Goal(s):**

Annually track and report the following SSO information: the location; a clear statement of whether the discharge entered a surface water directly or entered the MS4; date(s) and time(s) of each known SSO occurrence; estimated volume(s) of the occurrence; description of the occurrence indicating known or suspected cause(s); mitigation and corrective measures completed with dates implemented; and mitigation and corrective measures planned with implementation schedules. Update inventory as needed.

**SSO Reporting:**

In the event of an overflow or bypass, a notification must be reported within 24 hours by phone to MassDEP, EPA, and other relevant parties. Follow up the verbal notification with a written report following MassDEP's Sanitary Sewer Overflow (SSO)/Bypass notification form within 5 calendar days of the time you become aware of the overflow, bypass, or backup.

The MassDEP contacts are:  
Northeast Region (978) 694-3215  
205B Lowell Street  
Wilmington, MA 01887  
Central Region (508) 792-7650  
8 New Bond Street  
Worcester, MA 01606  
Southeast Region (508) 946-2750  
20 Riverside Drive  
Lakeville, MA 02347  
Western Region (413) 784-1100  
436 Dwight Street  
Springfield, MA 01103  
24-hour Emergency Line 1-888-304-1133

The EPA contacts are:  
EPA New England (617) 918-1510  
5 Post Office Square  
Boston, MA 02109

**BMP: Map of Storm Sewer System**

**BMP Number (Optional)** MCM 3-2

**Phase I Completed**   
(by year 5)

**Phase II Completed**   
(by year 13)

**Document Location and/or Web Address:** Town Hall - Town Administrator's office

**Description:**

Create a map for the urbanized areas in the Town of Dunstable showing outfalls, receiving waters, open channel conveyances, interconnections with other MS4s and other storm sewer systems, municipally-owned stormwater treatment structures, waterbodies identified by name and indication of all use impairments and initial catchment delineations, spatial locations, pipes, manholes, catch basins.

**Responsible Department/Parties:** Board of Health/Highway Department

**Measurable Goal(s):**

Map 100% of outfalls and receiving waters, open channel conveyances, interconnections with other MS4s and other storm sewer systems, municipally-owned stormwater treatment structures, waterbodies identified by name and indication of all use impairments, and initial catchment delineations within 2 years of the permit's effective date. Map 100% of outfall spatial locations, pipes, manholes, catch basins, refined catchment delineations, municipal sanitary sewer system (if available), and municipal combined sewer system (if applicable) within 10 years of the permit's effective date.

**BMP: IDDE Program**

**BMP Number (Optional)** MCM 3-3

**Written Document Completed (by year 4)**

**Document Name and/or Web Address:** IDDE program will be located in the Town Administrator's office.

**Description:**

A written IDDE program will be created followed with the implementation.

**Responsible Department/Parties:** Board of Health/Highway Department

**Measurable Goal(s):**

Conduct 100% of outfall screening on High and Low Priority Outfalls within 3 years of the permit's effective date. Complete catchment investigations for 100% of the Problem Outfalls within 7 years of the permit's effective date. Complete 100% of all catchment investigations within 10 years of the permit's effective date.

**The outfall/interconnection inventory and initial ranking and the dry weather outfall and interconnection screening and sampling results can be found:**

In the Town Administrator's office.

**BMP: Employee Training**

**BMP Number (Optional)** MCM 3-4

**Description:**

Training employees on IDDE implementation.

**Responsible Department/Parties:** Town Administrator's office

**Measurable Goal(s):**

Training occurs in the Spring annually.

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**BMP: Stormwater Discharge Rules and Regulations**

**BMP Number (Optional)** MCM 3-5

**Completed**

**Document Name and/or Web Address:** <https://www.dunstable-ma.gov>

**Description:**

The Town will establish Rules and Regulations for the Stormwater Discharge Bylaw.

**Responsible Department/Parties:** Board of Health/Highway Department

**Measurable Goal(s):**

Stormwater Discharge Rules and Regulations created by 2020.

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**BMP: Phosphorus Source Identification Report**

**BMP Number (Optional)** MCM 3-6

**Completed**

**Document Name and/or Web Address:** Phosphorus Source Identification Report

**Description:**

The Town of Dunstable will complete a Phosphorus Source Identification Report and its required elements as indicated in MA MS4 General Permit, Appendix H.2.1.b.

**Responsible Department/Parties:** Board of Health/Highway Department

**Measurable Goal(s):**

Phosphorus Source Identification Report completed by 2021.

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Add BMP



# MCM 4

## Construction Site Stormwater Runoff Control

### Permit Part 2.3.5

**Objective:** The objective of an effective construction stormwater runoff control program is to minimize or eliminate erosion and maintain sediment on site so that it is not transported in stormwater and allowed to discharge to a water of the U.S. through the permittee's MS4.

**Examples and Templates:**

Examples and templates relevant to MCM 4, including model ordinances and site inspection templates, can be found here: <https://www.epa.gov/npdes-permits/stormwater-tools-new-england#csrc>

**BMP: Sediment and Erosion Control Ordinance**

**BMP Number (Optional)** MCM 4-1

**Completed (by year 3)**

**Ordinances Link or Reference:** <https://www.dunstable-ma.gov/sites/dunstablema/files/uploads/general.pdf>

**Department Responsible for Enforcement:** Planning Board/Town Engineer

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**BMP: Site Plan Review Procedures**

**BMP Number (Optional)** MCM 4-2

**Written procedures completed (by year 3)**

**Document Name and/or Web Address:** Site Plan Review Procedures  
<https://www.dunstable-ma.gov/planning-board>

**Description:**

Complete written procedures on site plan review.

**Responsible Department/Parties:** Planning Board/Town Engineer

**Measurable Goal(s):**

Conduct site plan review of 100% of projects according to the procedures outlined above by 2021.

---

**BMP: Site Inspections and Enforcement of Sediment and Erosion Control Measures Procedures**

**BMP Number (Optional)** MCM 4-3

**Completed (by year 3)**

**Document Name and/or Web Address:** Site Inspections and Enforcement of Sediment and Erosion Control Measures  
<https://www.dunstable-ma.gov/planning-board>

**Description:**

Complete written procedures of site inspections and enforcement procedures.

**Responsible Department/Parties:** Planning Board/Town Engineer

**Measurable Goal(s):**

Inspect 100% of construction sites as outlined in the above document and take enforcement actions as needed by 2021.

---

**BMP:Stormwater Management Regulations**

**BMP Number (Optional)** MCM 4-4

**Completed**

**Document Name and/or Web Address:**

**Description:**

**Responsible Department/Parties:**

**Measurable Goal(s):**

**BMP:**

**BMP Number (Optional)** \_\_\_\_\_

**Completed**

**Document Name and/or Web Address:**

**Description:**

**Responsible Department/Parties:**

**Measurable Goal(s):**

**Add BMP**

# MCM 5

## Post Construction Stormwater Management in New Development and Redevelopment

Permit Part 2.3.6

**Objective:** The objective of an effective post construction stormwater management program is to reduce the discharge of pollutants found in stormwater to the MS4 through the retention or treatment of stormwater after construction on new or redeveloped sites and to ensure proper maintenance of installed stormwater controls.

**Examples and Templates:**

Examples and templates relevant to MCM 5, including model ordinances and bylaw review templates and guidance can be found here: <https://www.epa.gov/npdes-permits/stormwater-tools-new-england#pcsm>

**BMP: Post-Construction Ordinance**

**BMP Number (Optional)** MCM 5-1

**Completed** (by year 3)

**Town Ordinances Link or Reference:** Post-Construction Stormwater Management of New Developments and Redevelopments Bylaw  
<https://www.dunstable-ma.gov/sites/dunstablema/files/uploads/general.pdf>

**Department Responsible for Enforcement:** Planning Board/Town Engineer

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**BMP: Street Design and Parking Lot Guidelines Report**

**BMP Number (Optional)** MCM 5-2

**Completed** (by year 6)

**Document Name and/or Web Address:** Street Design and Parking Lot Guidelines  
<https://www.dunstable-ma.gov/planning-board>

**Description:**

Develop a report assessing requirements that affect the creation of impervious cover. The assessment will help determine if changes to design standards for streets and parking lots can be modified to support low impact design options.

**Responsible Department/Parties:** Planning Board/Town Engineer

**Measurable Goal(s):**

Recommendations are implemented by 2022 with progress reported annually.

---

**BMP: Green Infrastructure Report**

**BMP Number (Optional)** MCM 5-3

**Completed** (by year 6)

**Document Name and/or Web Address:** Green Infrastructure Report  
<https://www.dunstable-ma.gov/planning-board>

**Description:**

Develop a report assessing existing local regulations to determine the feasibility of making green infrastructure practices allowable when appropriate site conditions exist.

**Responsible Department/Parties:** Planning Board/Town Engineer

**Measurable Goal(s):**

Recommendations are implemented by 2022 with progress reported annually.

---

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**BMP: List of Municipal Retrofit Opportunities**

**BMP Number (Optional)** MCM 5-4

**Completed** (by year 6)

**Document Name and/or Web Address:** Target Properties to reduce impervious areas, official name to be determined.

**Description:**

The Town of Dunstable will identify at least five permittee-owned properties (if possible) that could be modified or retrofitted with BMP' to reduce impervious areas and update annually.

**Responsible Department/Parties:** Planning Board/Town Engineer

**Measurable Goal(s):**

The list is completed by 2021 and updated as needed.

---

**BMP:As-built Plans for on-site Stormwater Control**

**BMP Number (Optional)** MCM 5-5

**Completed**

**Document Name and/or Web Address:** As-built Plans for on-site Stormwater Control Submission Procedures, official name to be determined.

**Description:**

The Town of Dunstable will develop procedures to require submission of as-built drawings and ensure long term operation and maintenance will be a part of the SWMP.

**Responsible Department/Parties:** Planning Board/Town Engineer

**Measurable Goal(s):**

Procedures are implemented. NOI states 2019, pending approval of NOI this may need to be moved to 2020.

---

Add BMP

# MCM 6

## Good Housekeeping and Pollution Prevention for Permittee Owned Operations

Permit Part 2.3.7

**Objective:** The permittee shall implement an operations and maintenance program for permittee-owned operations that has a goal of preventing or reducing pollutant runoff and protecting water quality from all permittee-owned operations.

**Examples and Templates:**

Examples and templates relevant to MCM 6, including SOP templates for catch basin cleaning, street sweeping, vehicle maintenance, parks and open space management, winter deicing, and Stormwater Pollution Prevention Plans can be found here: <https://www.epa.gov/npdes-permits/stormwater-tools-new-england#gh>

## PERMITTEE OWNED FACILITIES

### BMP: Parks and Open Spaces Operations and Maintenance Procedures

BMP Number (Optional) MCM 6-1

Written Document Completed (by year 4)

Document Name and/or Web Address:

**Description:**

Create written O&M procedures including all requirements contained in 2.3.7.a.ii for parks and open spaces, buildings and facilities, and vehicles and equipment.

Responsible Department/Parties:

**Measurable Goal(s):**

Implement the SOP listed above on 100% of the parks and open space.

**Properties List (Optional):**

---

### BMP: Buildings and Facilities Operations and Maintenance Procedures

BMP Number (Optional) MCM 6-1

Written Document Completed (by year 4)

Document Name and/or Web Address:

**Description:**

This is to all be included in BMP MCM 6-1 listed above.

Responsible Department/Parties:

**Measurable Goal(s):**

Implement the SOP listed above on 100% of buildings and facilities.

**Properties List (Optional):**

---

### BMP: Vehicles and Equipment Operations and Maintenance Procedures

BMP Number (Optional) MCM 6-1

Written Document Completed (by year 4)



**Document Name and/or Web Address:** Dunstable Operation and Maintenance (O&M) Plan

**Description:**

The Town of Dunstable does not have a maintenance garage within the regulated Urbanized Areas. This document can be created for the other Town properties that are located within the UA to use as a guide if and when applicable.

**Responsible Department/Parties:** Town Administrator's office/Highway Department/School Superintendent

**Measurable Goal(s):**

Implement the SOP listed above for 100% of vehicles and equipment according to the above document by 2020.

**Properties List (Optional):**

---

## INFRASTRUCTURE

### BMP: Infrastructure Operations and Maintenance Procedures

**BMP Number (Optional)** MCM 6-2

**Written Procedure Completed (by year 4)**

**Document Name and/or Web Address:** Dunstable Stormwater Infrastructure Operations and Maintenance Plan

**Description:**

Establish and implement a program for repair and rehabilitation of MS4 infrastructure.

**Responsible Department/Parties:** Town Administrator's office/Highway Department/School SupTown Admi

**Measurable Goal(s):**

100% of infrastructure is maintained to ensure proper function in accordance with the procedures above. NOI states 2019, pending approval of NOI this may need to be moved to 2020.

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### BMP: Catch Basin Cleaning Program

**BMP Number (Optional)** MCM 6-2

**Written Procedure Completed (by year 4)**

**Document Name and/or Web Address:** Dunstable Stormwater Infrastructure Operations and Maintenance Plan

**Description:**

Included in the Infrastructure O&M Plan, there is a section dedicated to Catch Basin Cleaning including a catch basin inspection/cleaning procedure, inspection form and cleaning log located in Appendix B of the document.

**Responsible Department/Parties:**

**Measurable Goal(s):**

**BMP: Street Sweeping Program**

**BMP Number (Optional)** MCM 6-2 **Written Procedure Completed (by year 4)**

**Document Name and/or Web Address:**

**Description:**

**Responsible Department/Parties:**

**Measurable Goal(s):**

**BMP: Winter Road Maintenance Program**

**BMP Number (Optional)** MCM 6-2 **Written Procedure Completed (by year 4)**

**Document Name and/or Web Address:**

**Description:**

**Responsible Department/Parties:**

**Measurable Goal(s):**

**BMP: Stormwater Treatment Structures Inspection and Maintenance Procedures**

**BMP Number (Optional)** MCM 6-2 **Completed (by year 4)**

**Document Name and/or Web Address:** Dunstable Stormwater Infrastructure Operations and Maintenance Plan

**Description:**  
Included in the Infrastructure O&M Plan, there is a section dedicated to Structural Stormwater BMPs including a Structural Stormwater BMP Inspection procedures and Checklists in Appendix E of the document.

**Responsible Department/Parties:** Town Administrator's office/Highway Department/School Superintendent

**Measurable Goal(s):**  
Inspect and maintain 100% of treatment structures to ensure proper function.

**BMP: SWPPP**

**BMP Number (Optional)** MCM 6-3 **Completed (by year 4)**

**Document Name and/or Web Address:** Stormwater Pollution Prevention Plan

**Description:**  
The Town of Dunstable does not have the following permittee-owned or operated facilities with the UA: maintenance garages, public works yards, transfer stations, and other waste handling facilities where pollutants are exposed to stormwater as determined by the permittee. As a result, a SWPPP will not be needed at this time.

**Responsible Department/Parties:** Town Administrator's office/Highway Department/School Superintendent

**Measurable Goal(s):**

**BMP:**

**BMP Number (Optional)** \_\_\_\_\_ **Completed**

**Document Name and/or Web Address:** \_\_\_\_\_

**Description:**

**Responsible Department/Parties:** \_\_\_\_\_

**Measurable Goal(s):**

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Add BMP

# Annual Evaluation

## Year 1 Annual Report

Document Name and/or Web Address:

## Year 2 Annual Report

Document Name and/or Web Address:

## Year 3 Annual Report

Document Name and/or Web Address:

## Year 4 Annual Report

Document Name and/or Web Address:

## Year 5 Annual Report

Document Name and/or Web Address:

## Year X Annual Report

Document Name and/or Web Address:

Add a Year

## TMDLs and Water Quality Limited Waters

Select the applicable Impairment(s) and/or TMDL(s).

### **Impairment(s)**

- Bacteria/Pathogens     Chloride     Nitrogen     Phosphorus  
 Solids/oil/grease (hydrocarbons)/metals

### **TMDL(s)**

*In State:*

- Assabet River Phosphorus     Bacteria and Pathogen     Cape Cod Nitrogen  
 Charles River Watershed Phosphorus     Lake and Pond Phosphorus

*Out of State:*

- Bacteria and Pathogen     Metals     Nitrogen     Phosphorus

**Clear Impairments and TMDLs**

# Phosphorus

## Combination of Impaired Waters Requirements and TMDL Requirements as Applicable

Applicable Receiving Waterbody(ies)	TMDL Name (if applicable)	Add/Delete Row
Nashua River		<input type="button" value="+"/> <input type="button" value="-"/>

### Annual Requirements Beginning Year 3

Rank outfalls to these receiving waters as high priority for IDDE implementation in the initial outfall ranking

The relevant BMP number(s) listed above in the Stormwater Management Program OR the description of implementation actions and document location(s) are:

MCM 3 (IDDE) - MCM 3-1 through MCM 3-6

### *Public Education and Outreach*

*(Public education messages can be combined with other public education requirements as applicable (see Appendix H and F for more information))*

Distribute an annual message in the spring (April/May) that encourages the proper use and disposal of grass clippings and encourages the proper use of slow-release and phosphorus-free fertilizers

The relevant BMP number(s) listed above in the Stormwater Management Program OR the description of implementation actions and document location(s) are:

MCM 1-1, 1-4, 1-5

Distribute an annual message in the summer (June/July) encouraging the proper management of pet waste, including noting any existing ordinances where appropriate

The relevant BMP number(s) listed above in the Stormwater Management Program OR the description of implementation actions and document location(s) are:

MCM 1-1, 1-4, 1-5

Distribute an annual message in the fall (August/September/October) encouraging the proper disposal of leaf litter

The relevant BMP number(s) listed above in the Stormwater Management Program OR the description of implementation actions and document location(s) are:

MCM 1-4, 1-5

*Good Housekeeping and Pollution Prevention for Permittee Owned Operations*

-----  
Increase street sweeping frequency of all municipal owned streets and parking lots subject to Permit part 2.3.7.a.iii.(c) to a minimum of two times per year (spring and fall)

The relevant BMP number(s) listed above in the Stormwater Management Program OR the description of implementation actions and document location(s) are:

MCM 6-2

-----  
Establish procedures to properly manage grass cuttings and leaf litter on permittee property, including prohibiting blowing organic waste materials onto adjacent impervious surfaces

The relevant BMP number(s) listed above in the Stormwater Management Program OR the description of implementation actions and document location(s) are:

MCM 6-1

*Stormwater Management in New Development and Redevelopment*

-----  
Retrofit inventory and priority ranking under 2.3.6.1.b. shall include consideration of BMPs to reduce nitrogen discharges

The relevant BMP number(s) listed above in the Stormwater Management Program OR the description of implementation actions and document location(s) are:

MCM 5-2

*Nitrogen Reduction Tracking BMP*

-----  
Any structural BMPs listed in Table 3 of Attachment 1 to Appendix H already existing or installed in the regulated area by the permittee or its agents shall be tracked and the permittee shall estimate the phosphorus removal by the BMP consistent with Attachment 1 to Appendix H.



The BMP type, total area treated by the BMP, the design storage volume of the BMP and the estimated phosphorus removed in pass per year by the BMP is found in the following document or website and is updated yearly at a minimum:

NA

Requirements Due by Year 4

*Stormwater Management in New Development and Redevelopment*

-----  
The requirement for adoption/amendment of the permittee's ordinance or other regulatory mechanism shall include a requirement that new development and redevelopment stormwater management BMPs be optimized for phosphorus removal

The relevant BMP number(s) listed above in the Stormwater Management Program OR the description of implementation actions and document location(s) are:

MCM 5-1

Requirements Due by Year 6

-----  
Complete a Phosphorus Source Identification Report

The document name (if attached) and/or web address is/are:

MCM 3-6

*Stormwater Management in New Development and Redevelopment*

-----  
Retrofit inventory and priority ranking under 2.3.6.1.b. shall include consideration of BMPs that infiltrate stormwater where feasible

The relevant BMP number(s) listed above in the Stormwater Management Program OR the description of implementation actions and document location(s) are:

MCM 5-3 and 5-4

Requirements Due by Year 7

*Potential Structural BMPs*

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Evaluate all permittee-owned properties identified as presenting retrofit opportunities or areas for structural BMP installation under Permit part 2.3.6.d.ii or identified in the Phosphorus Source Identification Report that are within the drainage area of the impaired water or its tributaries

The relevant BMP number(s) listed above in the Stormwater Management Program OR the description of implementation actions and document location(s) are:

MCM 5-4

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Complete a listing of planned structural BMPs and a plan and schedule for implementation

The relevant BMP number(s) listed above in the Stormwater Management Program OR the description of implementation actions and document location(s) are:

MCM 5-4