

STORM WATER MANAGEMENT PLAN
FOR PHASE II STORM WATER MS4 NPDES PERMIT

By March 10, 2003 the Town of Ludlow is required to apply for and begin implementing a Phase II NPDES Permit for its Municipal Separate Storm Sewer System (MS4). This Storm Water Management Plan is a part of that permit, and should not be confused with other Town of Ludlow storm water permits required such as the Multi-Sector General Permit for Municipal-Industrial Operations (DPW yard, transfer station and the closed landfill).

It should be noted that this Federal initiative is actually part of the original NPDES program and the final extension for Municipalities to comply will expire on 3/10/02. The message that has been emphasized by EPA, DEP and others is that no further extensions shall be granted.

Ludlow falls into a category of Municipalities, regulated according to population density as reported in official 2000 Census Data, which owns and operates an MS4 and is required to prepare a Storm Water Management Plan and establish "Measurable Goals" for each of the following:

- Public Education and Outreach.
- Public Involvement.
- Illicit Discharge Detection and Elimination.
- Pollution Prevention and Good Housekeeping in Municipal Operations.
- Construction Site Runoff Control.
- Post Construction Stormwater Management in New Development or Redevelopment.

Public Education and Outreach. Provide information through educational materials/public meetings/PSA's to individuals and households to reduce storm water pollution.

1. Public Involvement. Involve the citizens of Ludlow in the development of the storm water management program.

2. Illicit Discharge Detection and Elimination.

Develop a storm sewer system map. This task must be completed within 5 years.

Prohibit illicit discharges by way of an ordinance, and develop appropriate enforcement actions.
Develop a plan to detect and address illicit discharges.
Inform the public, public employees and local businesses of the hazards of illegal discharges.
Educate the public and provide a means to report illicit connections/discharges.

3. Pollution Prevention and Good Housekeeping in Municipal Operations.

Develop and implement an operation and maintenance program that includes a training component.

Look to reduce pollutants from activities such as park and open space maintenance, building and fleet maintenance, new construction and land disturbance, and storm water system maintenance.

Evaluate maintenance activities and schedules and long term inspection procedures to reduce floatables and other pollutants.

Evaluate controls for reducing or eliminating discharges from roads, municipal parking lots, maintenance and storage sheds, salt/sand locations and snow disposal.

Develop procedures for disposal of waste (street sweepings, catch basin dredgings).

Employee Training.

4. Construction Site Runoff Control.

Develop, implement, and enforce a program to reduce pollutants in storm water runoff to municipal system from construction activities that result in a land disturbance of greater than or equal to one acre. Reduction of storm water discharges from construction activity disturbing less than one acre must be included in the program if that construction activity is part of a larger common plan of development or sale that would disturb one acre or more.

5. Post Construction Stormwater Management in New Development or Redevelopment.

Develop and implement strategies which include a combination of structural and/or non-structural best management practices (BMPs) appropriate for your community;

Use an ordinance or other regulatory mechanism to address post-construction runoff from new development and redevelopment projects to the extent allowable under State or other law;

Ensure adequate long-term operation and maintenance of BMPs.

Record keeping, program evaluation and yearly reporting is required.

It appears that applying for this permit, as we are required to do, involves developing policy in conjunction with other Town Departments, Staff and the public. Existing procedures may come under scrutiny and may possibly require change. i.e. documenting street sweeping activities, catch basin cleanings and other drainage system components.

All elements of the plan must be implemented by the expiration date of the permit period(5 years).