2021

Stormwater Pollution Prevention Plan

Milton DPW Yard

TOWN OF MILTON, MA
DEPARTMENT OF PUBLIC WORKS

Stormwater Pollution Prevention Plan – Table of Contents

SECTION 1 – Introduction

The Town of Milton has developed this Stormwater Pollution Prevention Plan (SWPPP) to address the requirements of the United States Environmental Protection Agency's (US EPA's) 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 2016 Massachusetts MS4 Permit.

The 2016 Massachusetts MS4 Permit requires that each permittee, or regulated community, address six Minimum Control Measures. These measures include the following:

1. Public Education and Outreach
2. Public Involvement and Participation
3. Illicit Discharge Detection and Elimination Program
4. Construction Site Stormwater Runoff Control
5. Stormwater Management in New Development and Redevelopment (Post Construction Stormwater Management); and
6. Good Housekeeping and Pollution Prevention for Permittee Owned Operations.

Under Measure 6, Good Housekeeping and Pollution Prevention for Permittee Owned Operations, the permittee is required, per Section 2.3.7.b of the 2016 Massachusetts MS4 Permit (page 50-54), to:

> *…develop and fully implement a SWPPP for each of the following permittee-owned or operated facilities: maintenance garages, public works yards, transfer stations, and other waste handling facilities where pollutants are exposed to stormwater as determined by the permittee.*
> *The SWPPP shall contain the following elements:*
> 1. *Pollution Prevention Team*
> 2. *Description of the facility and identification of potential pollutant sources.*
> 3. *Identification of stormwater controls*
> 4. *Management practices including: minimize or prevent exposure, good housekeeping, preventative maintenance, spill prevention and response, erosion and sediment control, management of runoff, management of salt storage piles or piles containing salt, employee training, and maintenance of control measures.*
> 5. *Site inspections*

This SWPPP accomplishes these requirements by:

- Providing an inventory of the materials and equipment at a facility that have the potential to cause stormwater pollution, and identifying locations where these materials are stored;
- Describing how stormwater is managed at a facility, including: engineered storm drain system conveyance; on-site pretreatment, treatment and infiltration systems; and discharges to surface water directly from the site;
- Reviewing activities that occur at the facility that represent a potential for stormwater pollution;
- Describing the Best Management Practices (BMPs) that will be implemented at the facility to reduce, eliminate and prevent the discharge of pollutants to stormwater;
- Identifying the employees responsible for developing, implementing, maintaining, and revising, as necessary, this SWPPP;
- Establishing a schedule and description of site inspections to be conducted at the facility to determine if the SWPPP is effective in preventing the discharge of pollutants;
- Serving as a tool for the facility employees, including a place to maintain recordkeeping associated with these requirements.

This SWPPP is adapted from a template created by the Central Massachusetts Regional Stormwater Coalition and Fuss & O'Neill, and partially funded by the Massachusetts Department of Environmental Protection.

SECTION 2 – Detailed Facility Assessment

2.1 Facility Summary

The Department of Public Works yard (DPW Yard) is located at 629 Randolph Ave. and is owned and operated by the Town of Milton. The Locus Map in **Figure 2-1** shows the location of the facility within the Town.

The Department of Public Works is primarily responsible for activities at, and maintenance of, the facility.

2.2 Site Inspection

The site inspection associated with the development of this SWPPP was completed on September 27, 2018. The inspection was conducted by Chase Berkeley, Thomas McCarthy, and Hillary Waite.

During the site inspection, information related to activities at the site, vehicles stored at the site, fueling operations, material storage, transport of oil and other materials, and spill history was gathered.

2.3 Pollution Prevention Team

A Pollution Prevention Team for the DPW Yard has been prepared and designated the task of developing, implementing, maintaining, and revising, as necessary, the SWPPP for this facility. Listed below are Pollution Prevention Team members and their respective responsibilities.
Responsibilities assigned to one or more members of the Pollution Prevention Team include:

- Implementing, administering and revising the SWPPP
- Regularly inspecting stormwater control structures
- Conducting stormwater training
- Recordkeeping

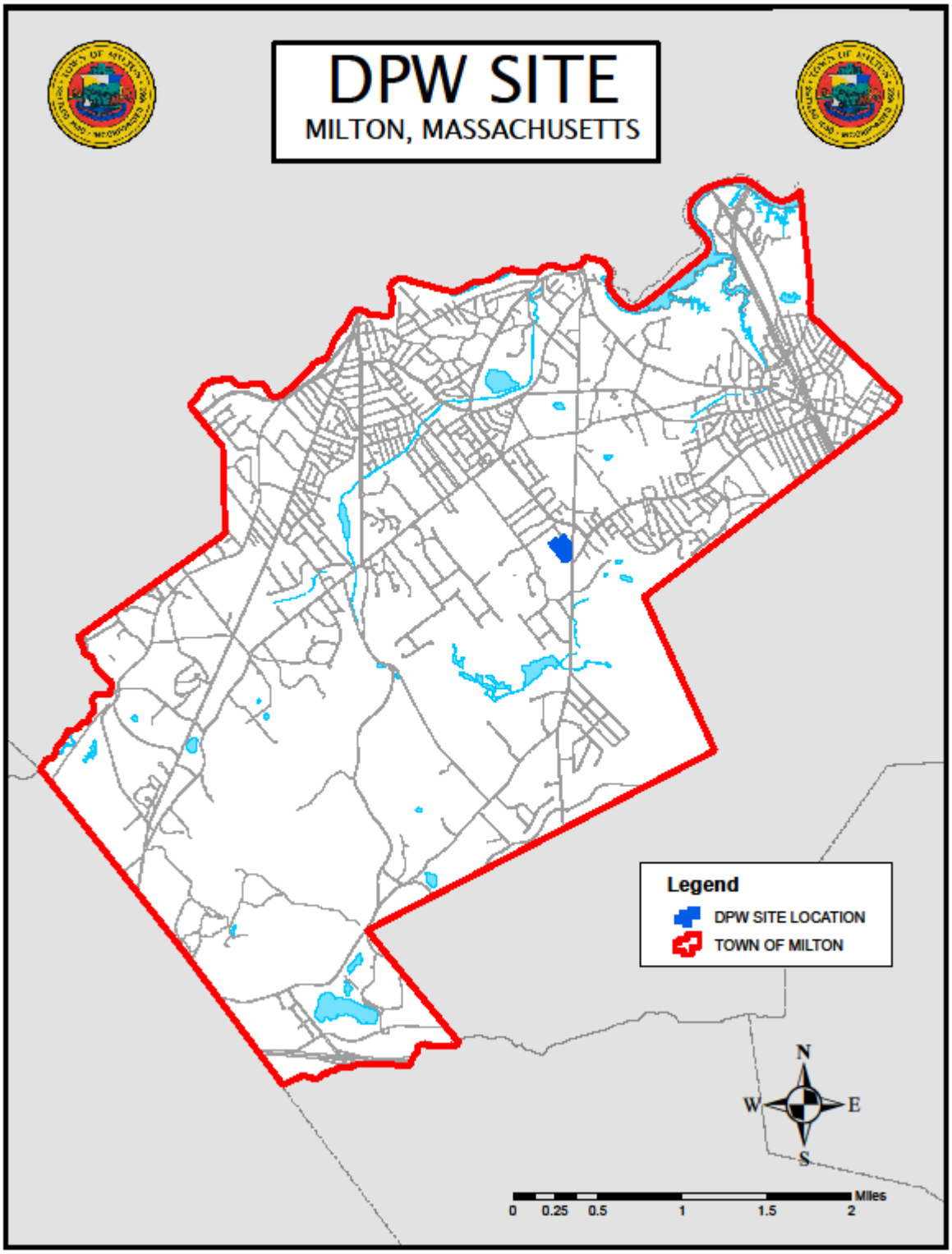
Leader: Director of Public Works (Chase Berkeley) **Phone:** 617-898-4971
Responsibilities: Considers all stages of plan development, inspections, and implementation; coordinates employee training programs; maintains all records and ensures that reports are submitted; oversees sampling program. Responsible for certifying the completeness and accuracy of the SWPPP.

Member: Assistant Director of Public Works (Thomas McCarthy) **Phone:** 617-898-4970
Responsibilities: Considers all stages of plan development, inspections, and implementation; coordinates employee training programs; supervises DPW Operations staff members.

Member: Foreman (Pat Balfe) **Phone:** 617-898-4970
Responsibilities: Senior member of DPW Operations staff; ensures good housekeeping practices are maintained and followed.

Member: Environmental Coordinator (Hillary Waite) **Phone:** 617-898-4968
Responsibilities: Administers SWPPP, including site inspection; coordinates employee training programs; maintains all records and ensures that reports are submitted.

Figure 2-1. Locus Map



2.4 Facility Description

The primary purpose of the DPW Yard is to serve as the base for public works operations, as well as house and repair Town vehicles and equipment. Activities at the site are described in **Section 2.7.** The facility covers approximately 8.74 acres and contains the structures and other features shown on the Site Map in **Figure 2-2** and described in detail in the following sections.

Figure 2-2. Site Map.

Site Map of DPW. This image is an aerial photograph of the Department of Public Works facility. Buildings, some vehicles, storage piles, and other structures are visible.

Engineered drainage structures are pictured on the map in light blue. Square icons indicate catch basins and circular icons indicate manholes. Lines indicate underground drainpipes. Arrows indicate direction of flow. While there are no outfalls on the property, sheet flow from the paved area enters the wooded area to the northwest, west, and south of the property.

Several structures are labeled. These structures are further described in Section 2.5.

2.5 Facility Structures

Vehicle Storage and Maintenance

Buildings at the DPW Yard are used to provide Milton personnel with heated, covered areas in which to complete minor maintenance, oil changes and preparation of vehicles, equipment and tools for use at locations around Milton.

Refer to Figure 2-2, Site Map, to locate each structure described below. Structures A-H are buildings on the property. These buildings were previously labeled A-H; this labeling is preserved in our site description for clarity.

A: Building A is located at the eastern portion of the property. It is commonly referred to as the "white building". Only administrative activities are conducted in this building. The building is fully enclosed.

B: Building B is located at the eastern portion of the property and is commonly referred to as the Vehicle Maintenance Garage. Activities at this building include vehicle and equipment storage, vehicle and equipment maintenance, vehicle and equipment washing, waste handling and disposal, and waste oil storage. The building is fully enclosed.

C: Building C is located at the eastern portion of the property and is commonly referred to as the Gilbane Building. Only administrative activities are conducted in this building. The building is fully enclosed.

D: Building D is located at the southwest portion of the property and is commonly referred to as the Operations Building. The building is used for DPW Operations staff administration and training. It is fully enclosed and has 6 floor drains, which discharge to the sanitary sewer (4 of the 6 drains are showers, as this building contains locker rooms).

E: Building E is located at the southwest portion of the property immediately adjacent to building D. It is commonly known as the Ericson Building. It is used for vehicle storage. The building is fully enclosed and has no floor drains.

F: Building F is located just northwest of the center of the property and is commonly referred to as the Vehicle Storage Garage. This garage is mainly used for storage of large vehicles when not in use. Maintenance is not conducted in the building. The building is fully enclosed and has no floor drains.

G: Building G is located at the northern portion of the property and is commonly referred to as the Salt Shed. The building is used solely for storage of the Town's salt and snow removal chemicals. It has no floor drains and is fully enclosed.

H: Building H is an additional vehicle storage building located at the northernmost end of the property. It has no floor drains and is fully enclosed when doors are closed.

I and J: Structures I and J are sediment forebays located in the northwest and south ends of the property respectively. Both serve to slow sheet flow from the property's large paved area before it enters the wooded area that surrounds the DPW facility on the northwest, west, and south.

Maintenance and Storage Buildings

Carpentry, electrical, and minor maintenance activities are completed in Building C/Gilbane. This building contains no floor drains and is fully enclosed.

Small equipment, signage, and tools are stored in Building C/Gilbane. This building contains no floor drains and is fully enclosed.

Latex paint, spray paint, and similar products are stored in buildings C/Gilbane and E/Erickson. This building contains no floor drains and is fully enclosed. These products are properly stored in flammable materials storage cabinets.

Waste Oil Burner

A waste oil burner formerly used and operated by the Town of Milton is located on the eastern side of building B. The burner is not currently in operation.

A gas and oil shed immediately behind building B provides fully-enclosed storage for waste oil drums.

Storage of Deicing Materials

Road salt and deicing chemicals at the DPW Yard are stored in the salt shed (Building G in Figure 2-2). The salt shed is fully covered. An aboveground storage tank of liquid magnesium chloride is located next to salt shed.

The good housekeeping measure used to minimize the exposure resulting for adding to or removing stored materials include sweeping the loading and unloading areas regularly or when salt has accumulated on the paved surface.

Storage of Road Deicing Equipment

The Town of Milton utilizes a number of salt spreaders and snow plows on its vehicles to adequately maintain roads. These and other road deicing equipment are stored in Building F.

Administrative Buildings

The DPW Yard Administrative offices are located at the eastern portion of the property. These offices include buildings A and C, as well as offices and administrative space in building D.

2.5.1 Additional Site Features

Aboveground Storage Tanks

Aboveground storage tanks (ASTs) at DPW Yard are used for storage of magnesium chloride and oil.

AST is located beside the salt shed for storage of magnesium chloride. The AST is not covered, and roof drainage discharges to the ground. Second AST is located at the rear of the central maintenance building for the storage of oil. The AST is not covered, and roof drainage discharges to the ground.

Fuel Islands

An island containing 2 fuel pumps for gasoline and 2 fuel pumps for diesel is located at the center of the property and is used on a 24-hour basis for fueling of all Town of Milton vehicles. The island is covered, and roof drainage discharges to the ground. Access to these fuel pumps is limited by personally assigned pass codes and fuel keys. The location of the fuel island is such that all users are visible to personnel at several buildings at the DPW facility.

Emergency Generators

An emergency generator located in Building B provides backup power to the facility during outages. The generator, 80KW, is fully enclosed and not located on impervious surface. It provides 110% containment of the volume of its 250 gallon diesel day tank. The second generator, 21KW, contains a volume of 54 gallons.

Oil/Water Separators

The Town of Milton maintains oil/water separators at DPW Yard.

Oil/water separator is located in the maintenance garage portion of the property. This pretreatment structure has a cleanout manhole, and is pumped on an annual basis. The Department of Public Works is responsible for contracting this work, and maintains records on the pump out activities. This oil/water separator provides treatment of flow from the maintenance garage. Floor drains in all areas where oil materials are used and/or where vehicles are stored receive pretreatment via this oil/water separator.

Solid Waste Management

The DPW maintains 2 30yd roll-off containers for use during DPW operations and maintenance. One container holds trash and one holds single-stream recyclables. These roll-offs are maintained by Milton's contracted solid waste hauler.

Additionally, the DPW maintains the following equipment in the Recycling Center at the northeast portion of the property. Containers are kept covered and closed when not in use. No inappropriate materials were observed during the facility inspection.

- One small shed with mercury-containing items stored inside. This shed is regularly emptied by Veolia.
- One small shed formerly used as a mercury shed. This building is no longer in use.
- One large shed for storage of recycled Freon items such as refrigerators, air conditioners, and dehumidifiers.
- One large red trailer for storage of donated books.
- One small white container for clothing and shoe donations.
- One dumpster for cardboard and single-stream recycling.
- One trailer for storage of recycled electronic and computer equipment.
- One trailer for storage of recyclable scrap metal.
- One trailer for storage of recyclable mattresses.
- Two 30-yard roll-offs for yard waste
- Storage piles of excavated material
- Short-term storage piles of catch basin and street sweeper cleanings
- Storage pile of wood chips

Parking Areas

There are several designated parking areas at the DPW Yard, each of which is an impervious surface. These parking areas are used primarily for visitors to the DPW Yard, Town of Milton-owned cars for daily use by DPW employees, and contractors' and employees' personal vehicles; DPW Yard trucks and/or heavy equipment are not kept in this parking lot.

While most parking areas and spaces are not marked out in the DPW Yard, it should be noted that there are 10 marked parking spaces in front of building A and approximately 40 additional "parking spots" in the yard where employee vehicles are regularly parked during the work day.

2.6 Site Drainage

Surface runoff received from abutting properties along Clifton, Rd and Highland, St.

Sheet Flow

Drainage from the impervious surfaces at the DPW Yard is directed to the northwest and south ends of the property. At the limits of the property, the northwest and south ends receive sheet flow into a wooded area. Sediment forebays are used to slow the flow and prevent erosion as water leaves the impervious area.

Engineered Drainage

Engineered drainage at the DPW Yard includes approximately five catch basins and two manholes. There are no stormwater outfalls on site. Maintenance of the catch basin structures, including sediment removal, is completed by the Department of Public Works.

2.6.1 Receiving Waters

The final point of discharge for stormwater from this site is an unnamed tributary to Pine Tree Brook. The tributary has not been identified as impaired. The good housekeeping practices, preventative maintenance and Best Management Practices implemented at the facility are appropriate and adequate controls.

Impairments of Pine Tree Brook are shown in **Table 2-1**, below.

Table 2-1. Impaired Waters Receiving Drainage from the Facility

DPW Yard

Water Body Name	ID	Category	Impairment(s)
Pine Tree Brook	MA73-29	5	Dissolved Oxygen/DO Saturation Solids/TSS/Turbidity E.coli Physical substrate habitat alterations Aquatic plants Fecal coliform

The types of impairments documented for this surface water body are related to dissolved oxygen, sedimentation, and pathogens. The activities and stored materials at the DPW Yard have the potential to affect these impairments.

Because Pine Tree Brook is impaired for turbidity, erosion and sedimentation controls and management of salt piles at the DPW Yard are critical.

The 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 3** of this SWPPP.

2.6.2 Applicable TMDLs

Water bodies identified as Category 5, as shown in **Table 2-1**, are impaired or threatened for the defined uses. Total Maximum Daily Loads (TMDLs) are required for the impairment shown. The following TMDLs have been developed:

- MA73-01-2002 CN 121.0 (Final Total Maximum Daily Loads of Bacteria for Neponset River Basin)

2.7 Site Activities

The following activities occur at the facility:

1. Compost Production or Storage
2. Facility or Building Maintenance
3. Fueling Operations
4. Landscaping
5. Chemical unloading, handling, and storage (including paint, flammables, fertilizers, and pesticides)
6. Painting
7. Paving
8. Sand storage
9. Salt storage
10. Snow dump (seasonal)
11. Solid waste management (including scrap metal)
12. Tool storage
13. Vehicle and equipment storage
14. Vehicle and equipment maintenance/repair (including oil changes)
15. Vehicle and equipment washing
16. Waste Handling and Disposal
17. Waste oil storage

Below is a discussion of site activities and the potential pollutant sources associated with each, as well as measures taken to minimize pollution. Locations of each activity are shown on the Site Plan (**Figure 2-1**).

The DPW Yard does not store hazardous materials other than those noted previously, and no obsolete vehicles or other potential sources of pollutants are kept in any structure at the DPW Yard.
No solvent-based parts washers were observed in any structure at the DPW Yard. Any hazardous materials are either collected by a third party vendor contracted by the Town of Milton on an annual basis, or collected at the annual Household Hazardous Waste Day that is hosted for the benefit of Milton residents.

Waste materials from DPW Yard operations that may be collected at the annual HHW Day include used motor vehicle fluids that cannot be utilized for the waste oil burner, such as used antifreeze and brake fluid. Any oil that may be contaminated with antifreeze, brake fluid, paint, or other additive that makes it unburnable in the waste oil furnace is also collected on the HHW Day instead of being used in the waste oil furnace. These materials are properly labeled and stored using appropriate Best Management Practices between the time of generation and disposal.

2.7.1 Compost Production or Storage

Potential Sources of Stormwater Pollution

Compost production and storage locations present the threat to contaminate stormwater with pathogens, including bacteria and viruses, nutrients, including phosphorus and nitrogen, fertilizers, pesticides and sediments.

Pollution Prevention

Compost storage areas should be contained within an area contained by silt fence or concrete barriers and located in an area that does not receive a substantial amount of runoff from upland areas and does

not drain directly to a waterbody. The compost shall be kept in neat, separate piles from all other materials.

2.7.2 Stockpiles and Sand Storage

Potential Sources of Stormwater Pollution

Sand stored in piles for use during construction and during winter plowing and deicing activities represents a potential source to stormwater pollution. Stockpiled materials such as gravel, loam, and crushed rock represent a similar source of pollution. When stored unprotected outdoors, sand piles and material stockpiles are exposed to precipitation. When the resulting eroded material enters the stormwater system, the sediment can quickly fill the sumps of catch basin structures, rendering them ineffective.

Mixing sand and salt for use in deicing activities poses an additional element of stormwater pollution, particularly if the mixing area is not fully enclosed and protected from the elements.

Pollution Prevention

To avoid contamination of stormwater by sand and other stockpiled materials, erosion and sediment control measures should be implemented at each storage site. When planning a location for a stockpile, a relatively level site away from slopes and water features should be selected.

Stockpiles can be stabilized by seeding or mulching if they are to remain exposed for more than two weeks, or can be covered with impermeable sheeting to protect the material from rainwater. If the stockpile location becomes a permanent storage site for sand, a roofed structure should be considered to reduce erosion.

Sediment barriers should be placed around the perimeter of the storage site to prevent any runoff carrying sand from entering storm drains and surface waters. If the weather becomes dry and windy, regular light watering of the stockpile and surrounding area will provide effective dust control.

Sand that has been mixed with salt for use during winter plowing and deicing activities should always be stored in an enclosed and covered salt shed. Salt sheds should be constructed on level ground with an impervious base on which to store the salt/sand mixture. Under no circumstances should loose salt/sand mix be stored outside and unprotected. All mixing of salt and sand should take place within the salt shed or other covered, enclosed area.

Ensuring that the storage area is regularly swept and kept clean is an important good housekeeping practice.

2.7.3 Salt Storage

Potential Sources of Stormwater Pollution

Salt stored in piles for use during winter plowing and deicing operations represents a potential major contributor to stormwater pollution. When stored unprotected outdoors, salt is exposed to precipitation, causing leachate with high chloride that can be discharged to the receiving water. Salt delivery and loading activities can contribute pollutants to stormwater if the material is not handled with care, and if spills from handling operations are not promptly cleaned up.

Pollution Prevention

To prevent stormwater pollution, all salt piles are enclosed and covered in sheds to prevent exposure to precipitation. Salt sheds should be constructed on level ground with an impervious base on which to store the salt. The shed should prevent disturbance or migration of the salt by wind.

During delivery and loading activities, salt should be transferred to and from vehicles within the salt shed, whenever possible. Any spills during unloading and loading events should be tended to without delay. Ensuring that the salt storage area is regularly swept and kept clean is an important good housekeeping practice.

The area should not be hosed down to a storm drain as a cleaning method. During and after delivery and loading, the salt storage area should be swept to prevent stormwater pollution.

2.7.4 Solid Waste Management

Potential Sources of Stormwater Pollution

Solid waste production and storage locations present the threat to contaminate stormwater with pathogens, including bacteria and viruses, nutrients, including phosphorus and nitrogen, metals and sediments.

Solid waste may be classified as both hazardous and non-hazardous waste consisting of agricultural, construction and demolition, dead animals, industrial, municipal, and tire waste.

Pollution Prevention

To prevent or reduce the potential for stormwater pollution from solid waste management practices the following preventative maintenance procedures are recommended:

1. All staff shall be properly trained in correct solid waste management practices, including waste disposal and spill prevention and response. All employees shall also be knowledge of the potential hazards associated with solid waste handling and storage.
2. Each waste storage location shall be properly labeled and all significant sources of pollution shall be kept in a secure, covered and contained area.
3. The facility and storage containers shall remain locked at all times other than during normal hours of operation.
4. All waste storage containers and waste handling equipment shall be routinely inspected for signs of spills, leaks, corrosion or general deterioration.
5. The facility shall maintain spill response materials.

2.7.5 Snow Dump

Potential Sources of Stormwater Pollution

Snow collected from plowing and road clearing activities and managed in snow dumps can contaminate engineered storm drain systems and receiving waters if disposal sites are not properly selected and maintained. As snow is removed from roadways, parking lots, sidewalks, and other paved areas, contaminants such as sand, salt, litter, and automotive oil are collected along with the snow. These pollutants are ultimately transported to the storage site and eventually to receiving waters once the snow melts.

Infiltration of pollutants in snow, such as chlorides from road salt, can impact groundwater, including drinking water aquifers.

When snow, including sand and debris contained within it, is stored directly on top of catch basins, when combined with sand and debris, discharge to the engineered drainage system can be blocked, causing localized flooding.

Pollution Prevention

To avoid contamination of stormwater and drinking water supplies by snow dumps, storage sites should be selected and prepared before the snow season begins. The snow dump should be located on a pervious surface in an upland area away from water resources and wells, so that meltwater can be filtered through the soil.

Selected sites should have a combined capacity large enough to cope with the estimated snowfall totals for the season. Snow should not be dumped within a Zone II or Interim Wellhead Protection Area of a public water supply, or within 75 feet of a private well. Sanitary landfills are not appropriate locations for snow dumps because the infiltration of meltwater will result in greater amounts of contaminated leachate. High groundwater levels also make gravel pits poor sites for snow storage.

Proper preparation and maintenance of snow disposal sites will also prevent stormwater pollution. Before winter begins, a silt fence or sediment barrier should be placed on the down-gradient side of the snow dump to collect any sediment in snow meltwater. If the site is located near a body of water, a 50-foot vegetated buffer strip (at minimum) should be maintained during the growth season to filter pollutants out of meltwater. Prior to using the site for snow disposal, all debris should be cleared.

Debris and litter left after the snow has melted should be cleared and disposed of at the end of the snow season, no later than May 15 of each year.

Except under the most extraordinary of circumstances, when all land-based snow disposal options have been exhausted, snow should not be dumped into any body of water. When this option is necessary, requirements of "Snow Disposal Guidance" (BRPG01-01) issued by MassDEP shall be followed[1].

2.7.6 Use or Storage of Pesticides or Fertilizers

Potential Sources of Stormwater Pollution

Improper use and storage of fertilizers and pesticides can contribute to loadings of nutrients and toxic compounds to stormwater. Applying fertilizers and pesticides in quantities exceeding the manufacturer's recommendations does not make the product more effective. Rather, excess fertilizer and pesticide will be washed away during precipitation events, entering directly into stormwater and surface waters. The risk of incorrect use or spilling of fertilizers and pesticides increases when the chemicals are not handled by properly trained personnel. Contamination of stormwater can also occur during storage, when the pesticides and fertilizers are not being directly used. Leaks and spills from faulty containers can migrate to the storm drain system if not promptly controlled. Fires may break out if pesticides and fertilizers are not stored in the appropriate facilities.

[1] https://www.mass.gov/doc/2019-snow-disposal-policy-and-guidance/download

Pollution Prevention

To avoid contamination of stormwater by fertilizers and pesticides during application, all products should be used in strict accordance with the manufacturer's instructions and with local regulations. Soil testing should be performed before evaluating and selecting a fertilizer. Using the right type and amount of fertilizer for the location will help ensure that the proper nutrients are absorbed by the plants and will reduce runoff. Efficient use of pesticides is maximized when pesticides are applied at the life stage when the pest is most vulnerable. Pesticides must be handled and applied by individuals licensed with the Massachusetts Department of Agricultural Resources.

Fertilizers and pesticides should always be stored indoors in well-ventilated, dry locations. Floors of storage areas should be watertight, impervious, and provide spill containment. In case a spill or leak does occur, storage areas and any vehicles transporting fertilizers and pesticides should be equipped with a spill response kit.

2.7.7 Vehicle and Equipment Storage

Potential Sources of Stormwater Pollution

Vehicle and equipment storage activities are a potential source of pollution due to the diesel fuel, gasoline, oil, hydraulic fluid, antifreeze and similar hazardous material or fuel the machinery may contain. In addition, vehicles or machinery may pick up pollutants during offsite activities or at other facilities, and then deposit these pollutants at the storage facility.

Pollution Prevention

Regular visual inspection and maintenance of vehicles and equipment can greatly reduce the potential for pollution by finding and addressing leaks before pollution of the environment occurs. When in storage, vehicles and equipment should be kept on a covered slab.

No equipment should be kept in an area where leaks could result in pollutants entering catch basins, channels leading to outfalls, or the engineered storm drain system. If vehicles and equipment are stored outdoors, catch basins or engineered drainage system structures should include devices intended to remove oils and sediments prior to entering the system. These treatment devices should be inspected and replaced at the frequency recommended by the manufacturer.

2.7.8 Vehicle and Equipment Maintenance/Repair

Potential Sources of Stormwater Pollution

Vehicle and equipment maintenance and repair often require the use of harmful liquids such as fuels, oils, and lubricants, and has the potential for producing dust, scrap and by-products that may contain pollutants. Both accidental and purposeful spillage, i.e., a leaky oil pan needing repair vs. draining the pan during an oil change, can lead to situations where pollutants can potentially enter stormwater runoff if the situations are not approached properly. Although there is little potential for effecting stormwater, it should be noted that hazardous gases can be produced during maintenance and repair as well.

Pollution Prevention

Proper maintenance and repair for vehicles and equipment shall include a preliminary assessment of potential pollutant sources. This assessment shall be used to determine the best means of containing

any potential spills or by-products of the situation at hand. Approved containers shall be used to capture hazardous liquids to then be disposed of according to applicable MassDEP and USEPA guidelines. If the project may produce hazardous dust that could come in contact and mix with any liquids, the proper containment shall be utilized.

Due to heavy metal accumulation in antifreeze, brake fluid, transmission fluid, and hydraulic oils, it is not recommended that any of these liquids are disposed of in the sanitary sewer system. Contaminated parts removed or replaced on any vehicles or equipment shall be disposed of properly.

All work shall take place on a covered slab.

Maintenance and repairs shall not take place in areas prone to stormwater runoff or where pollutants could enter catch basins, channels leading to outfalls, or an engineered storm drain system. All catch basins or engineered drainage systems on site that could be affected by accidental spills should include devices intended to remove oils and sediments prior to entering the system. These treatment devices should be inspected and replaced at the frequency recommended by the manufacturer.

2.7.9 Vehicle and Equipment Washing

Potential Sources of Stormwater Pollution

Vehicle and equipment washing activities are a potential source of pollution not only from petroleum products and pollutants deposited on the exterior of the equipment, but also from nutrients and sediment being washed into water bodies from the act of washing itself. Although some cleaning agents are becoming environmentally friendly, many still contain regulated contaminants. Due to the possibility for multiple types of pollutants, vehicle and equipment washing activities have a high potential for degrading stormwater quality.

Pollution Prevention

Outdoors, wash water shall not be allowed to directly enter water bodies. Use phosphate free detergents that do not contain regulated contaminants, and avoid using solvents where the wash water may enter a sanitary sewer. Impervious surfaces may be used to promote infiltration and treatment before wash water enters the groundwater, but wash water coming from impervious pavement shall be treated to remove nutrients and petroleum products before entering an engineered storm drain system. Infiltration shall not be used within wellhead protection areas or other protected resource areas. Power washing, steam cleaning and engine and undercarriage washing shall not occur outdoors. Heavily soiled or vehicle dirtied from salting shall not be washed outdoors. All adjacent catch basins shall have a sump and be cleaned periodically, (refer to Catch Basin Inspection and Cleaning procedure). All debris and particulate accumulation shall be removed and swept clean in all outdoor washing areas.

For both outdoor and indoor washing, maintain absorbent pads and drip pans to collect spills and leaks observed during washing activities.

Washing of all facility vehicles is completed outdoors at the DPW Yard. Wastewater from vehicle washing operations is discharged to a catch basin that is maintained by the Department of Public Works.

Salt and sand spreaders stored at the DPW Yard are occasionally washed at that location.

2.7.10 Waste Handling and Disposal

Potential Sources of Stormwater Pollution

Waste handling and disposal facilities and activities present a potential to contaminate stormwater with pathogens (including bacteria and viruses), nutrients, including phosphorus and nitrogen, fertilizers, pesticides and sediments.

There are several classifications of waste which contribute to stormwater pollution, including:

1. Solid Waste
2. Hazardous Materials and Waste
3. Pesticides and Fertilizers
4. Petroleum Products
5. Detergents

Pollution Prevention

A variety of measures are considered appropriate to prevent pollution from waste handling and disposal activities, based on the waste classifications noted previously.

Solid Waste

- Designate a waste collection area on the site that does not receive a substantial amount of runoff from upland areas and does not drain directly to a receiving water.
- Ensure that containers have lids so they can be covered before periods of rain and keep containers in a covered area whenever possible.
- Schedule waste collection to prevent the containers from overfilling.
- Clean up spills immediately and in accordance with spill response and cleanup procedures.

Hazardous Materials and Wastes

- To prevent leaks, empty and clean hazardous waste containers before disposing of them.
- Never remove the original product label from the container. Follow the manufacturer's recommended method of disposal, printed on the label.
- Never mix excess products when disposing of them, unless specifically recommended by the manufacturer.
- Clean up spills immediately and in accordance with spill response and cleanup procedures.

Pesticides, Fertilizers and Petroleum Products

- Do not handle the materials more than necessary.
- Store materials in a dry, covered, contained area.
- Clean up spills immediately and in accordance with spill response and cleanup procedures.

Detergents

- Never dump wastes containing detergents to a storm drain system. All wastes containing detergents shall be directed to a sanitary sewer system for treatment at a wastewater treatment plant.

In addition to the pollution prevention requirements a waste management plan is recommended. The plan shall include employee training and signage informing individuals of the hazards associated with improper storage, handling and disposal of wastes. It is imperative that all employees are properly

trained and follow the correct procedures to reduce or eliminate stormwater pollution. Routine visual inspection of storage and use areas is critical. The visual inspection process shall include identification of containers or equipment which could malfunction and cause leaks or spills. The equipment and containers shall be inspected for the following:

1. Leaks
2. Corrosion
3. Support or Foundation Failure
4. Other Deterioration

In the case a defect is found, immediately repair or replace.

2.7.11 Waste Oil Storage

Potential Sources of Stormwater Pollution

When not stored properly, waste oil can be a potential source of petroleum in stormwater. Waste oil containers can leak, and spills can occur while during transportation activities.

Pollution Prevention

All waste oil containers should be properly labeled and stored with secondary containment. Containers should be regularly inspected for rust, leaks, or other signs of deterioration. Defective containers should be promptly removed and replaced. A spill response kit should be located wherever waste oil is stored. Facility personnel should know where the spill kit is located and be familiar with the spill response procedure. Used oil filters should also be properly disposed.

Care should be taken when transferring used oil to and from storage containers.

Waste oil should be stored indoors or under a covered structure to prevent exposure to precipitation. Floor drain in waste oil storage areas should drain to an oil/water separator rather than the storm drain system.

When possible, steps should be taken to recycle waste oil or reduce the amount generated.

2.8 Vehicle and Equipment Inventory

Vehicles and major equipment stored and maintained at the facility are shown in **Table 2-2**. This table only includes vehicles stored at the DPW Yard. A full inventory can be found in the Town's Facilities Operation and Maintenance Program.

Table 2-2. Vehicle Inventory

#	Department Responsible for Management	Model Year	Manufacturer	Model	Plate[2]
18	Department of Public Works	1985	Chevrolet	Pickup	M45
19	Department of Public Works	1990	Mack	Dump Truck	M6352
20	Department of Public Works	1990	Mack	Dump Truck	M6337
21	Department of Public Works	1991	Custom	Flatbed trailer	M43127

[2] Some plate numbers are omitted.

22	Department of Public Works	1992	Chevrolet	Flatbed dump	M6325
23	Department of Public Works	1995	Bandit	Brush chipper	M6340
24	Department of Public Works	1995	Dietz Arrow Board	Trailer	M43132
25	Department of Public Works	1996	Chevrolet	3500	M978
26	Department of Public Works	1996	Chevrolet	Dump Truck	M6351
27	Department of Public Works	1997	Chevrolet	Truck Chassis	M6361
28	Department of Public Works	1997	John Deere	Front end loader	M16408
29	Department of Public Works	1998	Wright	Trailer	M86246
30	Department of Public Works	2002	Cross Country	Utility Trailer	M37928
31	Department of Public Works	2002	Cross Country	Utility Trailer	M24236
32	Department of Public Works	2003	Chevrolet	Kodiak	M6349
33	Department of Public Works	2004	Allmand	Utility Trailer	M28136
34	Department of Public Works	2005	Ford	F350	M6335
35	Department of Public Works	2005	Big Tex	Trailer	M41317
36	Department of Public Works	2005	Multi Quip	R2000	
37	Department of Public Works	2005	Sterling	L8500	M6361
38	Department of Public Works	2005	Ford	Bucket Truck F750	M6372
39	Department of Public Works	2006	Ford	F350 Dump Truck	M6364
40	Department of Public Works	2006	Ford	F350	M6314
41	Department of Public Works	2008	Ford	F450	M46718
42	Department of Public Works	2008	Ford	F450 Dump	M41307
43	Department of Public Works	2008	Ford	SRWSUP	M6307
44	Department of Public Works	2008	Camoplast	Sidewalk Tractor	M29476
45	Department of Public Works	2009	Toyota	Corolla	M78295
46	Department of Public Works	2009	Toyota	Corolla	M78296
47	Department of Public Works	2009	Toyota	Corolla	M78297
48	Department of Public Works	2010	International	4300SE Truck	M83597
49	Department of Public Works	2010	Ford	Fusion	M83600
50	Department of Public Works	2010	Ford	Fusion	M83590
51	Department of Public Works	2010	Ford	Fusion	M81901
52	Department of Public Works	2011	Ford	Escape	M85103
53	Department of Public Works	2011	Carlton	Chipper Trailer	M85119
54	Department of Public Works	2012	Ford	F350	M81940
55	Department of Public Works	2012	Ford	F250	M81941
56	Department of Public Works	2012	International	Dump Truck	M83793
57	Department of Public Works	2012	International	Truck	M83796
58	Department of Public Works	2012	Tennant	Tractor/Sweeper	M81929
59	Department of Public Works	2013	MGS	Pump Trailer	M88839
60	Department of Public Works	2013	Cam	Utility Trailer	M86236
61	Department of Public Works	2013	Trackless	Tractor	M81931
62	Department of Public Works	2013	Ford	Explorer	M97454

63	Department of Public Works	2014	Ford	F350	M88842
64	Department of Public Works	2015	American	Trailer	M93700
65	Department of Public Works	2015	John Deere	Loader tractor	M94695
66	Department of Public Works	2015	Ford	F350	M93699
67	Department of Public Works	2015	Sullar	Trailer	M92565
68	Department of Public Works	2016	Ford	F350	M95496
69	Department of Public Works	2016	Ford	F450	M95497
70	Department of Public Works	2016	Towmaster	Trailer	M94685
71	Department of Public Works	2016	Trackless	Tractor	M94697
72	Department of Public Works	2016	Freightliner	HU0040	M95480
73	Department of Public Works	2016	747	FR2000 ECO	M97248
74	Department of Public Works	2017	Peterbilt	348	M95484
75	Department of Public Works	2017	Wright	Utility Trailer	M93731
76	Department of Public Works	2017	John Deere	Loader	M97456
77	Department of Public Works	2017	Cross Country	4HD16 Flat Truck	M98982
78	Department of Public Works	2017	Ford	SDTYF	M98991
79	Department of Public Works	2017	Ver-Mac	Trailer	M98893
80	Department of Public Works	2017	Ver-Mac	Trailer	M98892
81	Department of Public Works	2017	Atlas	185	M99850
82	Department of Public Works	2017	Monster	Utility	M99844
83	Department of Public Works	2018	International	7400SB	M98994
84	Department of Public Works	2018	International	7400SB	M98993
85	Department of Public Works	2018	International	7000	M99847
86	Department of Public Works	2018	Ford	Focus	M77207
87	Department of Public Works	2018	Ford	Explorer	M99829
88	Department of Public Works	2018	International	7000	M99052
89	Department of Public Works	2018	International	7400SBA	M99067
90	Department of Public Works	2019	International	7400SB	M1694A
91	Consolidated Facilities	2000	Chevrolet	Van	M64274
92	Consolidated Facilities	2005	Ford	Expedition	M87498
93	Consolidated Facilities	2008	Dodge	Sprinter	M20808
94	Consolidated Facilities	2013	Ford	Tracon	M85915
95	Consolidated Facilities	2014	Ford	F250	M85907
96	Consolidated Facilities	2016	Carmate	Trailer	M95489
97	Consolidated Facilities	2016	Ford	F250	M81565
117	Parks and Recreation	1996	John Deere	Tractor	
118	Parks and Recreation	1987	Custom	Trailer	M16525
119	Parks and Recreation	1997	Chevrolet	Pickup	M56069
120	Parks and Recreation	1998	Harvey Rampgate	L716 Trailer	M56548
121	Parks and Recreation	2002	Ford	Neighbor	M64312
122	Parks and Recreation	2004	Chevrolet	Silverado	M36843

123	Parks and Recreation	2006	Utility	Trailer	M72385
124	Parks and Recreation	2006	Utility	Trailer	M72386
125	Parks and Recreation	2008	Chevrolet	Silverado	M80653
126	Parks and Recreation	2013	Chevrolet	Silverado	M81937
127	Parks and Recreation	2013	Wright	Trailer	M81938
128	Parks and Recreation	2016	Chevrolet	Silverado	M96090
129	Parks and Recreation	2018	Chevrolet	Silverado	M1683A
186	Department of Public Works	1997	Sreco	Rodding machine	M6328
187	Department of Public Works	1993	Ingersoll	Air compressor	M2103
188	Department of Public Works	1999	John Deere	Backhoe	M6319
189	Department of Public Works	2003	Chevrolet	Silverado	M55666
190	Department of Public Works	2003	Ingersoll	Compressor	M6347
191	Department of Public Works	2004	Ford	Pickup	M6350
192	Department of Public Works	2009	Ford	F350	M6353
	Department of Public Works		Elgin	Sweeper	M2647A

2.9 Location of Leak and Spill Cleanup Materials

Leak and spill cleanup materials are stored at DPW Yard in order to facilitate rapid response. Locations and types of leak and spill cleanup materials are identified in **Table 2-3**.

Table 2-3. Leak and Spill Cleanup Materials

Building or Area	Location	Materials Available
	Fuel Island	Full Spill Kit – Boom and spill pads
	Central Maint. Garage	Full Spill Kit – Boom and spill pads
	Operations Building D	Full Spill Kit – Boom and spill pads

2.10 Allowable Non-Stormwater Discharges

A non-stormwater discharge is defined as any discharge or flow to the engineered storm drain system that is not composed entirely of stormwater runoff.

Allowable non-stormwater discharges that occur at this facility include (or may include):

- Firefighting activities
- Water line flushing
- Rising ground water
- Uncontaminated ground water infiltration (as defined at 40 CFR § 35.2005(20))
- Uncontaminated pumped ground water
- Discharge from potable water sources
- Foundation drains
- Air conditioning condensation
- Flows from riparian habitats and wetlands

It has been determined that the above non-stormwater discharges at the DPW Yard do not represent a significant contribution of pollution to the MS4 or the waters of the United States. Therefore, these are considered to be authorized under the current MS4 permit.

2.11 Significant Material Inventory

Materials stored include those specified in **SECTION 2.7**, "Site Activities". An inventory of these materials at DPW Yard is included in **Table 2-5**, which also reviews the likelihood for each identified material to come in contact with stormwater. The type of container has also been identified. Oil, gasoline, and other petroleum-based materials are listed separately in the table.
The locations of these material storage areas are provided on the Site Plan in **Figure 2-2**.

Table 2-4. Significant Material Inventory

DPW Yard

Material	Storage Location	Potential Pollutant	Covered (C) or Enclosed (E)	Likelihood of Contact with Stormwater
Diesel fuel		Petroleum hydrocarbons	C	Low
Gasoline		Petroleum hydrocarbons	C	Low
Hydraulic Fluid		Petroleum hydrocarbons	C	Low
Motor Oil		Petroleum hydrocarbons	C	Low
Fuel Oil, No. 2		Petroleum hydrocarbons	C	Low
Fuel Oil, No. 6		Petroleum hydrocarbons	C	Low
Lubricants		Petroleum hydrocarbons	C	Low
Transmission Fluid		Petroleum hydrocarbons	C	Low
Waste Oil		Petroleum hydrocarbons	C	Low
Other:				
Antifreeze		Ethylene glycol; potential source of BOD	C	Low
Spray Lubricant		Petroleum hydrocarbons	C	Low
			C	Low
Sodium Bisulfite		pH adjustment	C	Low
Acid		pH adjustment	C	Low
Adhesives and sealants		Volatile and semivolatile organic compounds	C	Low
Aggregates		Sediments	C	Low

Animal Wastes		Fecal	C	Low
Asphalt		Sediments	C	Low
Batteries, Used Lead Acid		Lead, sulfuric acid; possible particulate matter and residual oil		High
Brake Fluid		Volatile organic compounds; non-petroleum based oil	C	Low
Coolant (new or used)		Volatile organic compounds	C	Low
Deicer- Calcium Chloride (liquid)		Chlorides	C	Low
Deicer- Road Salt		Chlorides	C	Low
Detergents		Surfactants	C	Low
Fertilizers		Nutrients	C	Low
Paint, Latex		Petroleum constituents, including volatile and semivolatile organic compounds	C	Low
Paint, Oil-Based		Petroleum constituents, including volatile and semivolatile organic compounds	C	Low
Paint, Spray		Petroleum constituents, including volatile and semivolatile organic compounds	C	Low
Pesticides		Volatile and semivolatile organic compounds	C	Low
Herbicides		Volatile and semivolatile organic compounds	C	Low
Sand		Sediments	C	Low
Solvents		Volatile organic compounds	C	Low
Solid Waste, Recyclable		Miscellaneous debris/solids, particulate matter, metals	E	Low
Solid Waste, for Disposal		Particulate matter, solids, metals	E	Low

Spill response material (Speedi Dri or similar)		Particulate matter, solids, residual oil.	E	Low

2.12 Applicability of Spill Prevention, Control and Countermeasure (SPCC) Requirements

Under federal regulations 40 CFR Part 112 (and Amendments), a Spill Prevention, Control, and Countermeasure (SPCC) Plan is required when a facility has an aboveground oil storage capacity greater than 1,320 gallons, when including containers with a capacity of 55 gallons or more. The DPW Yard does not have aboveground oil storage capacity that exceeds 1,320 gallons.

2.13 Description of Significant Material Storage Areas

Many activities at the DPW Yard which involve the materials included in **Table 2-5** occur within contained garages or bays. These activities may include minor equipment/vehicle repair, oil changes, repainting, lubrication, and parts replacement.

Fueling of all Town of Milton vehicles occurs at the Fuel Island located at the DPW Yard. All bulk delivery of fuel to the Fuel Island is monitored by a Town of Milton employee.

The DPW Yard emergency generator is fueled with diesel approximately once a year. The fuel is delivered to the storage tank which is located within building B. All bulk delivery of fuel to the emergency generator is monitored by a Town of Milton employee.

Waste oil system for the garage that is stored in external oil tank in rear of central maintenance facility. There is a second oil tank in same location for waste oil delivered by residents.

Chemicals, including automotive fluids, deicer, pesticides, and herbicides, are used at the DPW Yard. These chemicals are stored within Building B and fully contained. Delivery of all chemicals to the building is monitored by a Town of Milton employee.

Within Building G, deicing materials including road salt and sand are stored. Delivery of deicing materials to the building is monitored by a Town of Milton employee.

2.14 List of Significant Leaks or Spills

Significant leaks or spills that occurred at the DPW Yard in the last three years are shown in **Table 2-6.** Any future significant leaks or spills will be included in this SWPPP.

Table 2-6. Significant Leaks or Spills

No significant spills have occurred in the DPW yard in the past three years.

2.15 Structural BMPs

Structural BMPs include onsite constructed systems that provide pretreatment or treatment of stormwater flows. The following structural BMPs are presently used at the DPW Yard to maintain water quality.

2.15.1 Pretreatment Structural BMPs

- Deep sump catch basins
- Oil/Grit Separators
- Sediment Forebays
- Vegetated Filter strip
- Infiltration trench
- Level Spreader

2.15.2 Treatment Structural BMPs

- Vegetated swale

2.16 Sediment and Erosion Control

Site topography at the DPW Yard prevents drainage of stormwater and any associated sedimentation from entering the Town of Milton storm drain system or discharging directly to a water body.

SECTION 3 – Non-Structural Controls

3.1 Good Housekeeping

Good housekeeping practices are activities, often conducted daily, that help maintain a clean facility and prevent stormwater pollution problems. The following is a list of good housekeeping measures that are practiced at the facility:

- All fluid products and wastes are kept indoors.
- Fueling of small equipment is completed indoors.
- All floor drains present within garage bays drain to an oil/water separator.
- Spill materials and cleanup kits are maintained at all locations where oil materials are used, stored, or may be present, including at Fuel Islands.
- Used spill cleanup materials are disposed of properly.
- Materials are stored indoors or in covered areas to minimize exposure to stormwater.
- Lead-acid batteries are stored indoors and within secondary containment.
- Hazardous materials storage lockers with spill containment are used. Storage areas are located away from vehicle and equipment paths to reduce the potential of accident related leaks and spills.
- Storage drums and containers are not located close to storm drain inlets.
- All hazardous material storage areas and containers have proper signage, labels, restricted access, locks, inventory control, overhead coverage, and secondary containment.
- All materials, waste oil storage containers, and gas cans are properly labeled.
- Oil/water separators and catch basins are maintained regularly and properly.
- Speedi Dri (or similar absorbent) is readily available and used for appropriate spills.
- Spill kits are located in areas where fluids are stored or where activities may result in a spill.
- Tools and materials are returned to designated storage areas after use.
- Waste materials are properly collected and disposed of.
- Different types of wastes are separated as appropriate.
- Regular waste disposal is arranged.
- Work areas are clean and organized.
- Work areas are regularly swept or vacuumed to collect metal, wood, and other particulates and materials.
- Obtain only the amount of materials required to complete a job.
- Materials are recycled when possible.
- Staff is familiar with manufacturer directions for proper use of materials and associated Safety Data Sheets (SDSs).
- Staff is familiar with proper use of equipment.
- Drip pans are used for maintenance operations involving fluids and under leaking vehicles and equipment waiting repair.

The facility maintains a supply of spill cleanup materials at many buildings on site and will maintain this inventory. An inventory of spill containment, control, and cleanup materials and spill kits maintained at the DPW Yard was shown in **Table 2-3**.

3.2 Preventative Maintenance

Preventative Maintenance can minimize the occurrence of stormwater pollution by addressing issues before they become problems. Vehicles and equipment should be regularly inspected to prevent leaks of fuel, oil, and other liquids. Structural stormwater controls should be regularly maintained to prevent inadequate performance during storm events.

The following is a list of preventative maintenance procedures practiced at the facility.

- All staff members are aware of spill prevention and response procedures.
- All staff members have received formal spill prevention and response procedure training.
- All equipment fueling procedures are completed by qualified personnel trained in spill response procedures.
- Hydraulic equipment is kept in good repair to prevent leaks.
- Vehicle storage areas are inspected frequently for evidence of leaking oil.
- Material storage tanks and containers are regularly inspected for leaks.
- All material and bulk deliveries are monitored by facility employees.
- All waste oil is fully contained and the containers are inspected regularly.

3.3 Best Management Practices

In a SWPPP, existing and planned BMPs are identified that will prevent or reduce the discharge of pollutants in stormwater runoff for each area of concern listed in **SECTION 2**.

To prevent or reduce the potential of stormwater contamination from petroleum products, the following BMPs shall continue to be followed:

1. Follow standard operating procedures during delivery of waste oil to the equipment/waste oil storage bay.
2. Follow standard operating procedures during delivery of bulk oil to the emergency generator and bulk fuel to the Fuel Island.
3. Minimize the volume of gasoline stored within the buildings and on the site.
4. Clean up any oil spills observed in the parking lot, garages, or other surfaces in a timely manner.
5. Monitor all material deliveries.
6. Inspect all storage tanks prior to filling activities for spills, leaks and corrosion.

3.4 Spill Prevention and Response

The following procedures apply to the facility:

- All personnel are instructed in location, use, and disposal of spill response equipment and supplies maintained at the site such as oil absorbent materials.
- The Pollution Prevention Team leader will be advised immediately of all spills of hazardous materials or regulated materials, regardless of quantity.

- Spills will be evaluated to determine the necessary response. If there is a health hazard, fire or explosion potential, 911 will be called. If a spill exceeds five gallons or threatens surface waters, including the storm drain system, state or federal emergency response agencies will be called.
- Spills will be contained as close to the source as possible with oil-absorbent materials. Additional materials or oil-absorbent socks will be utilized to protect adjacent catch basins.

SECTION 4 – Plan Implementation

4.1 Employee Training

Regular employee training is required for employees who work in areas where materials or activities are exposed to stormwater, or who are responsible for implementing activities identified in the SWPPP, including all members of the Pollution Prevention Team.

The Department of Public Works is responsible for stormwater management training for DPW Yard employees. This position coordinates training related to stormwater management on at least an annual basis to review specific responsibilities for implementing this SWPPP, what and how to accomplish those responsibilities, including BMP implementation.

Additionally, general awareness training is provided regularly (preferably annually) to all employees whose actives may impact stormwater discharges. The purpose of this training is to educate workers on activities that can impact stormwater discharges and to help implement BMPs.

All employees responsible for the fueling or lubrication of vehicles or equipment stored at the facility will be trained regularly (preferably annually). The topics below will be covered at employee training sessions.

1. Spill prevention and response.
2. Good housekeeping.
3. Materials management practices.

Pollution Prevention Team members will meet at least twice a year to discuss the effectiveness of and improvement to the SWPPP.

4.2 Site Inspection Requirements

It is required that the entire DPW Yard be inspected at least once each calendar quarter when the facility is in operation (at least one inspection must be conducted during a period when stormwater discharge is occurring). The Director of Operations/Assistant Director of Public Works is responsible for completing this inspection.

The inspection must check for evidence of pollution, evaluate non-structural controls in place at the site, and inspect equipment. The site inspection report must include:

- 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
- Signed certification statement.

Corrective actions may be required based on evidence of past stormwater pollution or the high potential for future stormwater pollution to occur. Information about any issues and the respective corrective actions must be included in a Compliance Evaluation report. The permittee must repair or replace control measures in need of repair or replacement before the next anticipated storm event if possible, or as soon as practicable. In the interim, the permittee shall have back-up measures in place. The Compliance Evaluation report must be kept with the SWPPP and must state the problem, the solution, and when the solution was implemented.

A sample inspection form is included at the end of this document in Appendix A.

4.3 Recordkeeping and Reporting

The permittee must keep a written record (hardcopy or electronic) of all activities required by the SWPPP including but not limited to maintenance, inspections, and training for a period of at least five years.

This SWPPP shall be kept at the DPW Yard in Building A, as well as Town Hall in the Engineering Department, and shall be updated as described below in Section 4.4. The SWPPP and records shall be made available to state or federal inspectors and the general public upon request.

The 2016 Massachusetts MS4 Permit requires that each permittee report on the findings from Site Inspections in the annual report to USEPA and MassDEP.

Inspections of the DPW Yard should be performed at least quarterly (at least one during stormwater discharge) and described in the Annual Report, including any corrective actions taken, to demonstrate that operation of the DPW Yard is in compliance with the 2016 Massachusetts MS4 Permit.

4.4 Triggers for SWPPP Revisions

The Town of Milton shall review this SWPPP regularly to determine if any update or revision is required. Changes that may trigger revision include:

- An increase in the quantity of any potential pollutant stored at the facility;
- The addition of any new potential pollutant (not already addressed in this SWPPP) to the list of materials stored or used at the facility;
- Physical changes to the facility that expose any potential pollutant (not presently exposed) to stormwater;
- Presence of a new authorized non-stormwater discharge at the facility; or
- Addition of an activity that introduces a new potential pollutant.

Changes in activity may include an expansion of operations, or changes in any significant material handling or storage practices which could impact stormwater.

The amended SWPPP will describe the new activities that could contribute to increased pollution, as well as control measures that have been implemented to minimize the potential for pollution.

This SWPPP will be amended if a state or federal inspector determines that it is not effective in controlling stormwater pollutants discharged to waterways.

SECTION 5 – 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.

Appendix A: DPW Yard Site Inspection Report

General Information			
Site Name	Milton Department of Public Works Yard		
Location	629 Randolph Ave., Milton MA 02186		
Date of Inspection		**Start/End Time**	
Inspector's Name(s)			
Inspector's Title(s)			
Inspector's Contact Information			
Inspector's Qualifications	Member of the pollution prevention team		
Type of Inspection:	❑ Regular quarterly inspection ❑ During storm event ❑ Post-storm event		
Weather Information			
Weather at time of this inspection? ❑ Clear ❑Cloudy ❑ Rain ❑ Sleet ❑ Fog ❑ Snowing ❑ High Winds ❑ Other: Temperature:			
Have any discharges occurred since the last inspection? ❑Yes ❑No **If yes, describe:**			
Are there any discharges at the time of inspection? ❑Yes ❑No **If yes, describe:**			

Site-specific BMPs

- *Number the structural and non-structural BMPs identified in your SWPPP on your site map and list them below (add as many BMPs as necessary). Carry a copy of the numbered site map with you during your inspections. This list will ensure that you are inspecting all required BMPs at your site.*
- *Describe corrective actions initiated, date completed, and note the person that completed the work in the Corrective Action Log.*
- *Note or identify any maintenance, replacement, or repair necessary on BMPs.*

	BMP	**BMP Installed?**	**BMP Maintenance Required?**	**Corrective Action Needed and Notes**
1	Compost storage areas are located within a designated stockpile area contained by silt fence or concrete barriers.	❑Yes ❑No	❑Yes ❑No	
2	Compost storage is located in an area that does not receive a substantial amount of runoff form upland areas.	❑Yes ❑No	❑Yes ❑No	
3	Stockpiles materials are stored on a relatively level site away from slopes and water features.	❑Yes ❑No	❑Yes ❑No	
4	Sand that has been mixed with salt for deicing is stored under cover.	❑Yes ❑No	❑Yes ❑No	
5	Salt piles are enclosed and covered in shed.	❑Yes ❑No	❑Yes ❑No	
6	Snow dump is located on a pervious surface in an upland area away from water resources and wells.	❑Yes ❑No	❑Yes ❑No	

	BMP	BMP Installed?	BMP Maintenance Required?	Corrective Action Needed and Notes
7	Debris and litter left after snow has melted is cleared and disposed.	❑Yes ❑No	❑Yes ❑No	
8	Fertilizers and pesticides are stored indoors in well-ventilated, dry locations, on impervious floor.	❑Yes ❑No	❑Yes ❑No	
9	Equipment and vehicles are stored indoors on a covered slab.	❑Yes ❑No	❑Yes ❑No	
10	Vehicle maintenance work takes place on a covered slab.	❑Yes ❑No	❑Yes ❑No	
11	No vehicle maintenance liquids are disposed in the sanitary sewer system.	❑Yes ❑No	❑Yes ❑No	
12	Appropriate containers are used for vehicle fluids (including waste fluids).	❑Yes ❑No	❑Yes ❑No	
13	Vehicles are washed with phosphate-free detergent.	❑Yes ❑No	❑Yes ❑No	
14	Vehicles are washed on pervious surface.	❑Yes ❑No	❑Yes ❑No	
15	Waste oil containers are properly labeled and stored with secondary containment under a covered structure.	❑Yes ❑No	❑Yes ❑No	
	Structural BMPs			
16	Deep sump catch basins	❑Yes ❑No	❑Yes ❑No	

	BMP	BMP Installed?	BMP Maintenance Required?	Corrective Action Needed and Notes
17	Oil/grit separators	❑Yes ❑No	❑Yes ❑No	
18	Sediment forebays	❑Yes ❑No	❑Yes ❑No	
19	Vegetated filter strip	❑Yes ❑No	❑Yes ❑No	
20	Infiltration trench	❑Yes ❑No	❑Yes ❑No	
21	Level spreader	❑Yes ❑No	❑Yes ❑No	
22	Vegetated swale	❑Yes ❑No	❑Yes ❑No	

Overall Site Issues

Evaluate general control measures. Note any control measures needing maintenance or repair.

	Control measure	Implemented?	Maintenance Required?	Corrective Action Needed and Notes
1	To the extent practicable, are all materials inside or under cover, unless stormwater runoff will not be discharge to the MS4?	❑Yes ❑No	❑Yes ❑No	
2	Are all materials properly labeled and stored safely?	❑Yes ❑No	❑Yes ❑No	

	Control measure	Implemented?	Maintenance Required?	Corrective Action Needed and Notes
3	Are work areas clean, well swept, and free from leaking containers?	❑Yes ❑No	❑Yes ❑No	
4	Are discharge points and receiving waters free of any sediment deposits?	❑Yes ❑No	❑Yes ❑No	
5	Are natural resource areas (e.g., streams, wetlands, mature trees, etc.) protected with barriers or similar BMPs?	❑Yes ❑No	❑Yes ❑No	
6	Are controls in place to minimize erosion and/or stabilize sediment?	❑Yes ❑No	❑Yes ❑No	
7	Is trash/litter from work areas collected and placed in covered dumpsters?	❑Yes ❑No	❑Yes ❑No	
8	Are salt piles enclosed or covered?	❑Yes ❑No	❑Yes ❑No	

	Control measure	**Implemented?**	**Maintenance Required?**	**Corrective Action Needed and Notes**
9	Are vehicle and equipment fueling, cleaning, and maintenance areas free of spills, leaks, or any other deleterious material?	❑Yes ❑No	❑Yes ❑No	
10	Are materials that are potential stormwater contaminants stored inside or under cover?	❑Yes ❑No	❑Yes ❑No	
11	Are non-stormwater discharges (e.g., wash water, dewatering) properly controlled?	❑Yes ❑No	❑Yes ❑No	
12	(Other)	❑Yes ❑No	❑Yes ❑No	

Identify any previously unidentified discharges from the site:

Describe:

Identify any SWPPP changes required as a result of inspection:

Describe:

CERTIFICATION STATEMENT

"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."

Print name and title: _____

Signature:_____ Date:_____