2021

Stormwater Pollution Prevention Plan

Milton Cemetery

TOWN OF MILTON, MA

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 Milton Town Cemetery (Cemetery) is located at 211 Centre Street 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 Cemetery Department 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 August 24, 2018. The inspection was conducted by Hillary Waite and Therese Desmond.

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 Cemetery 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: Cemetery Superintendent (Lisa Ahern) **Phone:** 617-898-4888
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: Environmental Coordinator **Phone:** 617-898-4968
Responsibilities: Administers SWPPP and related record-keeping; recommends employee training programs; maintains all records and retains copies of reports.

Member: Foreman (Mark Chapman) **Phone:** 617-698-0200
Responsibilities: Performs quarterly SWPPP inspections and delivers to Superintendent and Environmental Coordinator for record-keeping.

Figure 2-1. Locus Map

2.4 Facility Description

The primary purpose of the Cemetery is to serve as the burial site for residents of Milton. The Cemetery provides its own landscaping, operations, and maintenance services. Accordingly, a garage facility exists on site to house and repair Town vehicles and equipment. Activities at the site are described in **SECTION 2.7.**

The facility covers approximately 104 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

Overall view: an aerial view of the complete Cemetery facility. The Administrative buildings, Operations buildings, and barn are labeled.

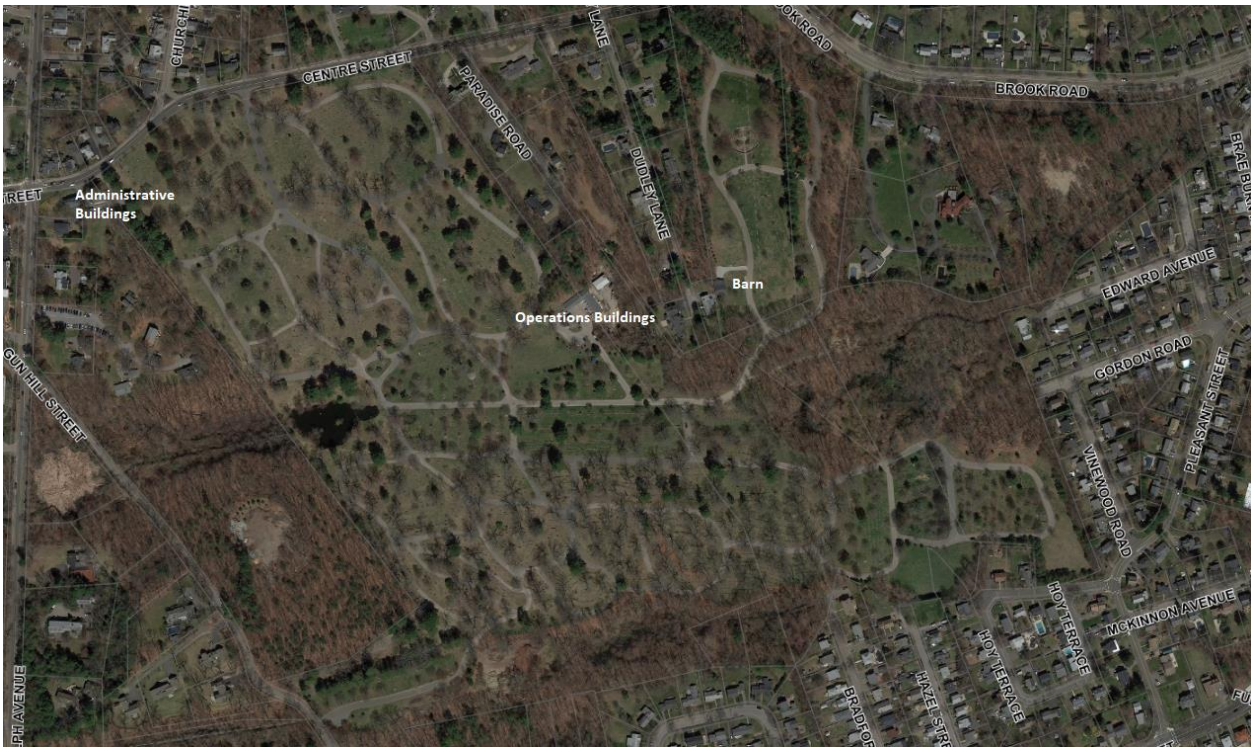


Figure 2-3

Administrative buildings: The Cemetery House (211 Centre St., the office, and garage) are located in the northwest portion of the cemetery property. Some gravesites and a private home are visible.

Figure 2-4

Operations buildings and barn: Operations buildings are labeled A-E. #210 and #211 Dudley Road are labeled with their addresses for clarity. These buildings should not be mistaken for 211 Centre Street and adjacent buildings. The building labeled F is the barn.

2.5 Facility Structures

Refer to the above aerial images.

Administrative Buildings

The Cemetery Administrative offices are located at the northwest portion of the property. All are visible in Figure 2-3. These two buildings include the Cemetery Offices and the house at 211 Centre Street, where the Cemetery director resides. General administrative work occurs at these buildings.

The lunchroom, labeled E in Figure 2-4, is located in the northeast part of the property near the garage buildings. Staff use the space for break time.

Vehicle Storage and Maintenance

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

The 211 Centre Street Garage is located at the northwest part of the property next to the 211 Centre Street House, shown in Figure 2-3. This garage stores cars and light maintenance equipment such as rakes and shovels. There are no floor drains in this building.

The Steele garage, labeled D in Figure 2-4, stores vehicles undergoing maintenance.

The vehicle garage and the Kubota garage, labeled A and C respectively in Figure 2-4, are used to store light and heavy vehicular equipment respectively. There are no floor drains in these buildings.

The vehicle garage and Kubota garage are connected by a space that was added to the property after the garages' initial construction. This connecting space is used as a vehicle workshop, labeled B in Figure 2-4. There are no floor drains in this portion of the property.

The cemetery barn, labeled F in Figure 2-4, is located east of the garage buildings and east of private homes at 210 and 211 Dudley Lane. The barn is used for storage of off-season equipment, such as plows and salt spreaders.

Maintenance and Storage Buildings

Carpentry, electrical, and minor maintenance activities are completed in the workshop (B). This building contains no floor drains and is fully enclosed.

Small equipment, signage, and tools are stored in the Steele garage (D) and workshop (B). This building contains no floor drains and is fully enclosed.

Latex paint, spray paint, and similar products are stored in the Steele garage (D). This building contains no floor drains and is fully enclosed. These products are properly stored in flammable materials storage cabinets.

Storage of Deicing Materials

Deicing materials are not stored at the Cemetery. When deicing is necessary, Cemetery staff pick up deicer from the Department of Public Works.

Storage of Road Deicing Equipment

The Town of Milton utilizes a number of salt spreaders, sanders, and snow plows on its vehicles to adequately maintain roads. These devices are located in the vehicle garage during winter when in use. During the off-season, these devices are stored in the cemetery barn. When equipment is out of use, the equipment is suspended off the ground so that can easily be cleaned, inspected, and maintained, but is protected from the elements.

2.5.1 Additional Site Features

Aboveground Storage Tanks

Aboveground storage tanks (ASTs) at Cemetery are used for storage of gasoline and diesel fuel. The tanks are 250 gallons each. The tanks are covered by concrete casing. The tanks are located outside the Kubota garage. The tanks are surrounded by bollards.

An inventory of significant materials is included in **SECTION 2.12**.

Emergency Generators

There is NO backup emergency generator

Solid Waste Management

The Town of Milton maintains two dumpsters at the eastern portion of the property. These dumpsters are kept closed when not in use. No inappropriate materials were observed during the facility inspection.

Parking Areas

There are two designated parking areas at the Cemetery, each of which is an impervious surface. One is located near the 211 Centre Street house for parking at the administrative office, and the other is located by the vehicle maintenance and storage area. These parking lots are used primarily for visitors to the Cemetery, Town of Milton-owned cars for daily use by Cemetery employees, and employees' personal vehicles.

The 211 Centre Street buildings contain 6 parking spaces. The vehicle maintenance area contains 10 parking spaces. The total number of parking spaces in the Cemetery property is 16.

While no additional parking exists, visitors to the Cemetery often use the paved ways within the Cemetery as temporary parking while visiting gravesites or attending funeral services.

2.6 Site Drainage

No stormwater from adjacent properties impacts the Cemetery property.

Sheet Flow

Drainage from the impervious surfaces at the Cemetery is directed to the engineered drainage system or grassy areas within the cemetery.

Engineered Drainage

Engineered drainage at the Cemetery includes approximately 51 catch basins and 13 manholes. There are 0 stormwater outfalls on site (engineered drainage from the site eventually outfalls to Unquity Brook). 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 into groundwater or Unquity Brook. Unquity Brook has been categorized as a 303(d) List (Impaired) surface water. The impairment of this brook is considered a Category 5, meaning that more than one designated use is impaired and that a TMDL will be required.

Unquity Brook's impairments are:

- Dissolved oxygen
- Phosphorus
- Solids/Total Suspended Solids/Turbidity
- E. coli
- Debris/floatables/trash
- Low flow alterations
- Physical substrate habitat alterations
- Fecal coliform
- Low pH

The activities and stored materials at the Cemetery have the potential to affect these impairments. Fertilizer use and compost storage can impact nutrient impairments. Sanding for deicing can affect total suspended solids on site and turbidity in the water body.

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 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:

- Facility or Building Maintenance
- Landscaping
- Chemical unloading, handling, and storage (including paint, flammables, fertilizers, and pesticides)
- Painting
- Sand storage
- Solid waste management (including scrap metal)
- Tool storage
- Vehicle and equipment storage
- Vehicle and equipment maintenance/repair (including oil changes)
- Vehicle and equipment washing
- 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 described in Section 2.5.

The Cemetery 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 Cemetery.
No solvent-based parts washers were observed in any structure at the Cemetery. Any hazardous materials are collected by a third party vendor contracted by the Town of Milton.

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. Please refer to SOP 6, "Erosion and Sedimentation Control," included in **Appendix A**, for more information.

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.

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. 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.

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.

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 are always 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 water tight, 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.

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 the course of 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.

Vehicle and Equipment Maintenance/Repair

Potential Sources of Stormwater Pollution

Vehicle and equipment maintenance and repair often requires 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.

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

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 equipment or vehicles dirtied from salting shall not be washed outdoors. All adjacent catch basins shall have a sump and be cleaned periodically. All debris and particulate accumulation shall be removed and swept clean in all outdoor washing areas.

The use of detergents shall be avoided and when the use of detergents cannot be avoided, use detergents free from phosphates and regulated contaminants. All drains that discharge directly to a water body of engineered storm drain system shall be plugged or abandoned. Dry clean-up methods such as vacuuming and sweeping shall be used whenever possible to avoid washing down floors with water.

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

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 spill response and prevention procedures. In the case of the Cemetery facility, waste oil is stored on top of pallets inside the workshop in order to prevent exposure to weather and provide secondary containment.

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**.

Table 2-2. Vehicle Inventory

Department	Model year	Make	Model	Plate #
Cemetery	1985	Lindsay	Air Compressor	M6379
Cemetery	1998	Chevrolet	GMT 400	M62667
Cemetery	2019	JCB	Backhoe	M6376
Cemetery	2008	Chevrolet	Chassis Truck	M78279
Cemetery	2009	Chevrolet	Silverado	M55633
Cemetery	2011	Chevrolet	Truck	M85120
Cemetery	2010	Ford	Fusion	M83590
Cemetery	2014	JCB	Backhoe	M94465
Cemetery	2016	Chevrolet	Silverado	M97481

2.9 Location of Leak and Spill Cleanup Materials

Leak and spill cleanup materials are stored at Cemetery 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
Vehicle Garage	Shelf	PPE (gloves, goggles, haz mat suit) Sorbent socks Sorbent pads/pillows Speedy-Dry or other absorbent Disposable bags Shovel and broom
Workshop	Shelf on wall next to Kubota garage	

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:

- Water line flushing
- Rising ground water
- Uncontaminated ground water infiltration (as defined at 40 CFR § 35.2005(20))
- Uncontaminated pumped ground water
- Irrigation water, spring
- Flows from riparian habitats and wetlands

It has been determined that the above non-stormwater discharges at the Cemetery 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 Cemetery 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 2-5. Significant Material Inventory

Cemetery

Material	Location	Potential Pollutant	Covered (C) or Enclosed (E)	Likelihood of Contact with Stormwater
Diesel fuel		Petroleum hydrocarbons		Low
Gasoline		Petroleum hydrocarbons		Low

Hydraulic Fluid		Petroleum hydrocarbons		Low
Motor Oil		Petroleum hydrocarbons		Low
Fuel Oil, No. 2		Petroleum hydrocarbons		Low
Fuel Oil, No. 6		Petroleum hydrocarbons		Low
Lubricants		Petroleum hydrocarbons		Low
Transmission Fluid		Petroleum hydrocarbons		Low
Waste Oil		Petroleum hydrocarbons		Low
Other:				
Antifreeze		Ethylene glycol; potential source of BOD		Low
Spray Lubricant		Petroleum hydrocarbons		Low
Sodium Hypochlorite		Chlorides; pH adjustment		Low
Sodium Bisulfite		pH adjustment		Low
Acid		pH adjustment		Low
Adhesives and sealants		Volatile and semivolatile organic compounds		Low
Aggregates		Sediments		Medium
Animal Wastes		Fecal		High
Asphalt		Sediments		Medium
Batteries, Used Lead Acid		Lead, sulfuric acid; possible particulate matter and residual oil		Low
Brake Fluid		Volatile organic compounds; non-petroleum based oil		Low
Coolant (new or used)		Volatile organic compounds		Low
Deicer- Calcium Chloride (liquid)		Chlorides		Low (when in storage) High (when in use on roads)
Deicer- Road Salt		Chlorides		Low (when in storage)

				High (when in use on roads)
Detergents		Surfactants		Medium
Fertilizers		Nutrients		Medium
Paint, Latex		Petroleum constituents, including volatile and semivolatile organic compounds		Low
Paint, Oil-Based		Petroleum constituents, including volatile and semivolatile organic compounds		Low
Paint, Spray		Petroleum constituents, including volatile and semivolatile organic compounds		Low
Pesticides		Volatile and semivolatile organic compounds		Medium
Herbicides		Volatile and semivolatile organic compounds		Medium
Sand		Sediments		Medium
Solvents		Volatile organic compounds		Low
Solid Waste, Recyclable		Miscellaneous debris/solids, particulate matter, metals		Low
Solid Waste, for Disposal		Particulate matter, solids, metals		Low
Solid Waste, C&D		Particulate matter, solids, metals		Low
Spill response material (Speedi Dri or similar)		Particulate matter, solids, residual oil.		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 Cemetery does not have aboveground oil storage capacity that exceeds 1,320 gallons.

2.13 Description of Significant Material Storage Areas

Many activities at the Cemetery 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.

Heavy equipment used in the cemetery is fueled onsite at the fuel tanks. All bulk delivery of fuel to the aboveground tank at the Cemetery is monitored by a Town of Milton employee.

Waste oil and other used motor fluids are stored in the workshop. Waste oil is stored in tanks and drums, all of which have internal containment or are located on appropriate containment pallets. Waste oil is not delivered to any building at the Cemetery.

Chemicals, including pesticides and herbicides, are used at the Cemetery. These chemicals are stored within the Steele Garage and fully contained. Delivery of all chemicals to the garage is monitored by a Cemetery employee.

2.14 List of Significant Leaks or Spills

No significant leaks or spills have occurred at the Cemetery in the last three years. If such a spill occurs, the Town will document information about the spill in this section.

2.15 Sediment and Erosion Control

Site topography at the Cemetery prevents drainage of stormwater and any associated sedimentation from entering the Town of Milton storm drain system or discharging directly to a water body. The Cemetery retains all drainage on site.

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.
- 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.
- Bollards, berms, and containment features are in place around areas and structures where fluids are stored.
- 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 Cemetery 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.

- 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. Require presence of a Town of Milton employee during delivery of fuel to the emergency generator and aboveground storage tanks. Also, adhere to the following BMPs:
   a. Do not smoke while fuel handling is underway.
   b. Keep away sources of flame during fuel handling.
   c. Protect catch basins and manholes.
   d. Turn off and set all brakes (including hand brakes) of delivery vehicles.
   e. Watch for any leaks or spills.
   f. Load drummed materials into covered space.
   g. Delivery driver and Town employee shall remain with vehicles during delivery process.
2. Minimize the volume of gasoline stored within the buildings and on the site.
3. Clean up any oil spills observed in the parking lot, garages, or other surfaces in a timely manner.
4. Monitor all material deliveries.
5. 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 Cemetery Department is responsible for stormwater management training for Cemetery employees. Training may be performed in partnership with the Department of Public Works or other departments. 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 Cemetery 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). A member of the Pollution Prevention Team 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.

The inspection form for these inspections, and copies of completed inspection forms, are included at the end of this document.

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.

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 Cemetery administrative office at 211 Centre Street. It will also be kept on file with the Environmental Coordinator at Town Hall. It shall be updated if necessary, based on conditions described in the 2016 General Permit. The SWPPP and records shall be made available to state or federal inspectors and the general public upon request.

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

Inspections of the Cemetery 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 Cemetery is in compliance with the 2016 Massachusetts MS4 Permit.

4.4 Triggers for SWPPP Revisions

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.

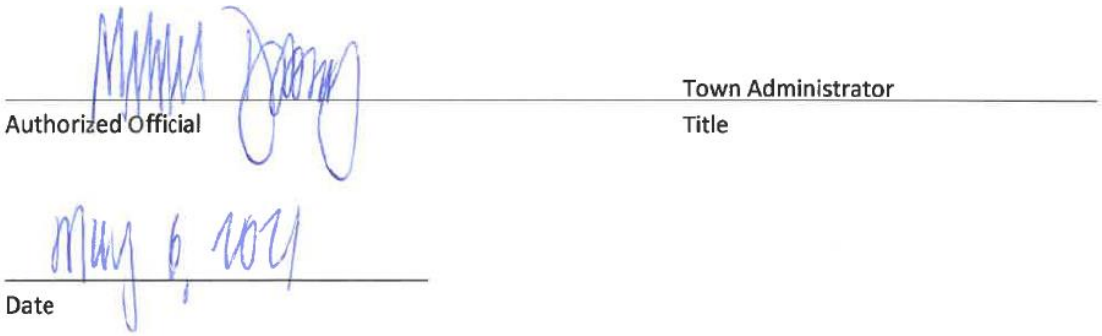
Changes in activity may include an expansion of operations, or changes in any significant material handling or storage practices which could impact stormwater.

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: Cemetery Site Inspection Report

General Information			
Site Name	Milton Cemetery		
Location	211 Centre Street, 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 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 or in practice?**	**BMP Maintenance Required?**	**Corrective Action Needed and Notes**
1	Stockpiled materials (sand, loam, etc.) are stored on relatively level sites away from slopes, water features, and drainage structures.	❑Yes ❑No	❑Yes ❑No	
2	Long-term stockpiles are seeded or mulched to prevent erosion.	❑Yes ❑No	❑Yes ❑No	
3	Long-term stockpiles employ sediment barriers to prevent runoff from carrying sand.	❑Yes ❑No	❑Yes ❑No	
4	Storage areas for sand, salt, soil, etc. are regularly swept.	❑Yes ❑No	❑Yes ❑No	
5	Dumpsters and other waste containers are properly labeled and kept covered.	❑Yes ❑No	❑Yes ❑No	
6	Dumpsters are free of spills, leaks, corrosion, and general deterioration.	❑Yes ❑No	❑Yes ❑No	
7	Fertilizers and pesticides are stored indoors in	❑Yes ❑No	❑Yes ❑No	

	BMP	BMP Installed or in practice?	BMP Maintenance Required?	Corrective Action Needed and Notes
	well-ventilated, dry locations.			
8	Fertilizers and pesticides are always used according to manufacturer's instructions and not in excess.	❑Yes ❑No	❑Yes ❑No	
9	Pesticides are applied by a licensed professional.	❑Yes ❑No	❑Yes ❑No	
10	Vehicles are free of leaks.	❑Yes ❑No	❑Yes ❑No	
11	Fleet vehicles are stored indoors when not in use.	❑Yes ❑No	❑Yes ❑No	
12	During vehicle maintenance, any fluids or other potential pollutants are captured with appropriate containers and disposed of according to state and federal guidelines.	❑Yes ❑No	❑Yes ❑No	
13	Vehicles are washed with phosphate-free detergents on grassed areas or indoors.	❑Yes ❑No	❑Yes ❑No	
14	Waste oil is properly labeled and stored with secondary containment (such as on top of pallets).	❑Yes ❑No	❑Yes ❑No	
15	Spill cleanup materials are present in areas where spills may occur.	❑Yes ❑No	❑Yes ❑No	

	BMP	BMP Installed or in practice?	BMP Maintenance Required?	Corrective Action Needed and Notes
16	Hazardous materials are stored indoors and labeled properly.	❑Yes ❑No	❑Yes ❑No	
17	Town of Milton employee is present during delivery of fuel to the emergency generator and aboveground storage tanks.	❑Yes ❑No	❑Yes ❑No	
18	All personnel are instructed in location, use, and disposal of spill response equipment and supplies.	❑Yes ❑No	❑Yes ❑No	
19	Work areas have proper signage, labels, restricted access, locks, inventory control, overhead coverage, and secondary containment.	❑Yes ❑No	❑Yes ❑No	
20	Storage drums and containers are not located close to storm drain inlets.	❑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	
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,	❑Yes ❑No	❑Yes ❑No	

	Control measure	**Implemented?**	**Maintenance Required?**	**Corrective Action Needed and Notes**
	etc.) protected with barriers or similar BMPs?			
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	
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	

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:_____