

Randolph, Massachusetts
Stormwater Pollution Prevention Plan
(SWPPP)
Department of Public Works
June 2020

DEPARTMENT OF PUBLIC WORKS - 4 CARLINO WAY



BETA

315 Norwood Park South
2nd Floor
Norwood, Massachusetts 02062
781.255.1982
www.BETA-Inc.com

Stormwater Pollution Prevention Plan (SWPPP)

Randolph, Massachusetts


DEPARTMENT OF PUBLIC WORKS - 4 CARLINO WAY

Prepared by: BETA GROUP, INC.
Prepared for: Town of Randolph

June 2020

SWPPP Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.



Authorized Official



Title



Date

TABLE OF CONTENTS

Introduction	1
1.0 Pollution Prevention Team.....	1
2.0 Description of Facility	2
2.1 Facility Summary	2
2.2 Site Map.....	2
2.2.1 Inventory of Building	2
2.2.2 Parking Areas	3
2.2.3 Inventory of Vehicles & Equipment.....	3
2.3 Site Drainage & Receiving Waters.....	3
2.3.1 Receiving Waters.....	3
2.4 Potential Pollutant Sources.....	3
3.0 Stormwater Controls	4
4.0 Management Practices	5
4.1 Minimize or Prevent Exposure.....	5
4.2 Good Housekeeping	7
4.3 Preventative Maintenance.....	8
4.4 Spill Prevention and Response	9
4.5 Erosion and Sediment Control	10
4.6 Management of Runoff	11
4.7 Salt Storage Piles or Piles Containing Salt.....	11
4.8 Employee Training.....	12
4.9 Maintenance of Control Measures.....	12
5.0 Site Inspections.....	13
6.0 Recommendations.....	14
6.1 Structural Components.....	14
6.2 Non-Structural Components	14

LIST OF TABLES

Table 2-1	Inventory of Buildings
Table 2-2	Impaired Waters Receiving Drainage from the Facility

LIST OF APPENDICES

Appendix A	Site Map
Appendix B	Vehicle Inventory
Appendix C	Summary of Site Activities and Potential Stormwater Pollutants
Appendix D	Inventory and Inspection Checklist

INTRODUCTION

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

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

1.0 POLLUTION PREVENTION TEAM

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

Name:	Keith Nastasia	Title:	Director	Department	Department of Public Works
Phone:	781-961-0940	Email:	knastasia@randolph-ma.gov		
Responsibilities: MS4 Coordinator, IDDE Program, Good Housekeeping, Reporting & Record Keeping					

Name:	Jean Pierre-Louis	Title:	Town Engineer	Department:	DPW-Engineering
Phone:	781-961-0950	Email:	jpierrelousi@randolph-ma.gov		
Responsibilities: MS4 Co-Coordinator IDDE Program, Good Housekeeping, SWPPP Training, Reporting & Record Keeping					

Name:	Arthur O'Leary	Title:	Foreman	Department:	DPW-Highway
Phone:	781-961-0943	Email:	N/A		
Responsibilities: Good housekeeping, O&M of facilities, SWPPP					

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

2.0 DESCRIPTION OF FACILITY

2.1 FACILITY SUMMARY

The Town of Randolph DPW facility is located at 4 Carlino Way in Randolph, Massachusetts (the site) and is owned and operated by the Town. Information provided in this, and the following sections is based on observations made during a site visit on March 18, 2020. During the site visit, BETA personnel were escorted by Mr. Arthur O’Leary of the Town of Randolph. Mr. O’Leary provided a general overview and layout of facility operations, activities performed and material storage information.

The site is primarily covered by buildings and paved parking areas. This site is surrounded by other Town owned facilities including baseball and soccer fields and a senior center. The site’s location is depicted on the Site Map included in Appendix A. Pertinent site details, including layout, location of any stormwater outfalls, receiving waters and structural controls, are depicted on the Site Map.

2.2 SITE MAP

The facility consists of approximately 6.5 acres and contains the structures and other features identified above, shown on the Site Map and described in detail in the following sections. Components shown on the site map include:

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

2.2.1 INVENTORY OF BUILDING

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

Table 2.1 - Inventory of Buildings

No.	Use	Floor Drain
1	Salt Storage	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N
2	Highway Division Administration/Storage	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N
3	Mechanics Garage/Vehicle Storage	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N
4	Water Department Administration/Storage	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N
5	Vehicle Storage and Washing	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N
6	Sewer Department Administration/Storage	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N

2.2.2 PARKING AREAS

Employee parking is provided at the following locations: the area north of Building 5 provides parking for approximately 15± vehicles and the area adjacent to the west of Building 2 provides an additional 5± parking space. Town-owned heavy equipment and larger vehicles are stored in the various garages at the facility.

2.2.3 INVENTORY OF VEHICLES & EQUIPMENT

The Town maintains an inventory of vehicles and heavy equipment. A copy of the inventory is included in Appendix B.

2.3 SITE DRAINAGE & RECEIVING WATERS

Drainage from the on-site impervious surfaces is directed to an engineered drainage system including catchbasins and manholes. Floor drains located in the vehicle maintenance and washing areas (Buildings 3 and 5 – Site Map) are connected to the drainage system. There is an Oil/Water Separator on the drain line from Building 5. Maintenance of the drainage system is completed by the Department of Public Works.

2.3.1 RECEIVING WATERS

The final point of discharge for stormwater from this site is Glovers Brook. Based on field reconnaissance and outfall mapping provided by the Town, the outfall location is where Glovers Brook flows beneath North Street, south of Regina Road. Glovers Brook flows east to its confluence with the Cochato River near the eastern border of Town. The Cochato River has been categorized as a 303(d) List (Impaired) surface water. Impaired water or "impaired condition" means a water body that does not meet applicable water quality standards or fully support applicable beneficial uses, due in whole or in part to water pollution from point or nonpoint sources. This receiving water is assigned the unique identifier MA72-21 and is considered a Category 5, meaning that one or more designated use is impaired for a particular pollutant. Impairments of this water body are shown in Table 2-1, below.

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

Water Body Name	ID	Category	Impairment(s)
Cochato River	MA74-06	5	Chlordane and DDT in fish tissue Fecal coliform Escherichia coli Dissolved oxygen

The types of impairments documented for this surface water body are related to pesticides and human and animal waste and bacteria levels (dissolved oxygen impairment). These impairments are not likely related to stormwater operations at the site.

2.4 POTENTIAL POLLUTANT SOURCES

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

3.0 STORMWATER CONTROLS

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

4.0 MANAGEMENT PRACTICES

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

4.1 MINIMIZE OR PREVENT EXPOSURE

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

Fueling Areas

Vehicle fueling activities can result in gasoline and diesel fuel entering the storm drain system. Spills can occur by topping off fuel tanks and during deliveries. If possible, fueling areas should be placed under cover in order to minimize exposure. Best management practices for fueling areas include the following:

- Deliveries to fuel tanks and fueling of vehicles and equipment should occur on impervious surfaces with proper containment. Spill response kits should be readily accessible at fueling and maintenance areas.
- Fuel dispenser containment features (grooves in concrete pad perimeter) should be kept free of debris.
- Fueling areas owned or operated by the municipality should be covered.

Vehicle Storage

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

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

Vehicle and Equipment Maintenance

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

- Conduct routine inspections of heavy equipment and vehicles to proactively identify maintenance needs or potential leaks.
- Use drip pans as needed until repairs can be performed and when drip pans are used, avoid overtopping.

- Drain fluids from leaking or wrecked vehicles and parts as soon as possible. Dispose of fluids properly.
- Perform routine preventive maintenance to ensure heavy equipment and vehicles are operating optimally.
- Recycle or dispose of waste properly and promptly.
- Conduct all body repair and painting work indoors.
- Minimize waste from paints and thinners. Calculate paint needs based on surface area.
- Do not wash or hose down storage areas unless there is prior approval to collect and discharge the water into the sanitary sewer. Use dry cleanup methods (vacuum, sweep) to clean up metal filings and dust and paint chips from grinding, shaving and sanding. Sweep debris from wet sanding after allowing it to dry overnight on the shop floor. Dispose of waste properly; never dump waste into storm or sanitary sewers.
- Do not dump any liquids or other materials outside, especially near or in storm drains or ditches.
- Store materials and waste in labeled containers under cover and in secondary containment.
- Chemicals should not be combined in containers.
- Carefully transfer collected fluids from containers into designated storage areas as soon as possible.
- Waste liquids (oil, antifreeze, etc.) should be properly stored on-site and routinely disposed by licensed waste haulers at licensed disposal facilities.
- Store new and used batteries securely to avoid breakage. Store indoors or in secondary containment to contain potential acid leaks. Recycle used batteries.

Parts Cleaning

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

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

Vehicle and Equipment Wash Waters

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

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

Earth Material Stockpile Areas

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

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

4.2 GOOD HOUSEKEEPING

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

Sweeping and Cleaning of Parking Lots

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

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

Waste Management

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

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

4.3 PREVENTATIVE MAINTENANCE

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

Use Storage and Disposal of Potential Pollutants

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

- Storage and handling areas should be covered or enclosed to reduce potential contact with stormwater and wind.

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

4.4 SPILL PREVENTION AND RESPONSE

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

- Preventive measures such as barriers between material storage and traffic areas, secondary containment provisions, and procedures for material storage and handling.
- Response procedures that include notification of appropriate facility personnel, emergency agencies, and regulatory agencies, and procedures for stopping, containing, and cleaning up leaks, spills and other releases. Measures for cleaning up hazardous material spills or leaks shall be consistent with applicable Resource Conservation and Recovery Act (RCRA) regulations at 40 CFR section 264 and 40 CFR section 265. Employees who may cause, detect, or respond to a spill or leak shall be trained in these procedures and have necessary spill response equipment available. If possible, one of these individuals should be a member of the Pollution Prevention Team; and

- Contact information for individuals and agencies that shall be notified in the event of a leak, spill, or other release. Where a leak, spill, or other release containing a hazardous substance or oil in an amount equal to or in excess of a reportable quantity established under 40 CFR section 110, 40 CFR section 117, or 40 CFR section 302, occurs during a 24-hour period, the permittee shall notify the National Response Center (NRC) at (800) 424-8802 in accordance with the requirements of 40 CFR section 110, 40 CFR section 117, and 40 CFR section 302 as soon as the permittee has knowledge of the discharge. State or local requirements may necessitate reporting spills or discharges to local emergency, public health or drinking water supply agencies, and owners of public drinking water supplies. Contact information shall be in locations that are readily accessible and available.

Spill Prevention Plans

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

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

4.5 EROSION AND SEDIMENT CONTROL

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

Erosion Control

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

- Prevention of erosion and sedimentation is preferable to installing treatments devices.
- Protect vegetated and wooded buffers and leave vegetated areas undisturbed to the extent possible.
- Inspect sites regularly for locations of poor vegetation cover, erosion and sedimentation and channelization. If stabilization is required, corrective actions should be identified and implemented as soon as possible.
- If exposed, soils should be stabilized by mulching, seeding with fast-growing native grass and/or planted with native tree and shrubs. Use erosion control blankets when seeding slopes.
- If necessary, slow stormwater runoff velocities with conveyance measures such as riprap channels or vegetated swales, check dams, level spreaders and outlet protection, etc.
- A buffer/filter strip should be left around surface waters. No fertilizers or pesticides should be applied in the buffer/filter strip except where necessary.

4.6 MANAGEMENT OF RUNOFF

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

Catchbasin Cleaning Program

All catchbasins on the site are to be included in the catchbasin inspection and cleaning optimization program.

Stormwater Management Structural BMP Maintenance

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

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

Structural Pretreatment BMPs

WATER QUALITY UNIT (OIL/GRIT SEPARATOR)

Water quality units, also referred to as oil/grit separators, are underground storage tanks with chambers designed to remove heavy particles, floating debris and hydrocarbons from stormwater. These units are typically considered a pretreatment BMP for land uses with higher potential pollutant loads and risk of petroleum spills. Cleaning these units is important to prevent sediment from re-suspending and discharging during future storm events. Inspection and maintenance should include the following:

- Inspect and clean unit – cleaning includes removal of accumulated oils and grease and sediment using a vacuum truck or other ordinary catch basin cleaning device
- Polluted water or sediments removed from an oil grit separator unit should be disposed of in accordance with all applicable local, state and federal laws and regulations including M.G.L.c. 21C and 310 CMR 30.00.

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

4.7 SALT STORAGE PILES OR PILES CONTAINING SALT

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

4.8 EMPLOYEE TRAINING

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

The permittee shall document the following information for each training:

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

4.9 MAINTENANCE OF CONTROL MEASURES

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

5.0 SITE INSPECTIONS

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

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

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

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

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

6.0 RECOMMENDATIONS

Based on BETA's March 18, 2020 site visit, we are providing the following recommendations to attain or maintain compliance with the MS4 permit requirements.

6.1 STRUCTURAL COMPONENTS

Structural components of stormwater management include those that are physically constructed and/or implemented such as catchbasins, material enclosures, drainage swales or berms. The following structural components are recommended for the site.

1. The current fueling area is uncovered and exposed to rain. If a petroleum release were to occur during a storm event, this could result in a discharge of petroleum to the stormwater system. We recommend that a cover be installed over the vehicle fueling area.
2. Current vehicle washing at the site results in washwater discharge directly to the stormwater drainage system at the site. Such discharges are not authorized under the MS4 permit. We recommend one or more of the following be performed to eliminate this discharge:
 - a. Construct a wash rack to collect and discharge washwaters to the sanitary sewer system (with authorization from the local sewer authority) via a water quality system such as an oil/water or grit separator.
 - b. Procure 3rd party vehicle washing services. These operations are equipped to handle fleet vehicle washing and resulting washwater. This would eliminate the discharge of washwater to the storm drain system at the site.
3. Road sand is currently stored in an uncovered area at the site. We recommend that road sand be stored under a covered structure (existing or new) to prevent potential impacts to the storm drainage system.
4. In order to address the concerns of items 1-3 noted above, the Town may consider installing a stormwater treatment device prior to the outfall to Glovers Brook to treat all of the stormwater on the site.

6.2 NON-STRUCTURAL COMPONENTS

Non-structural components of stormwater management include administrative controls, planning, routine maintenance and cleaning operations. Based on BETA's site visit we recommend the following:

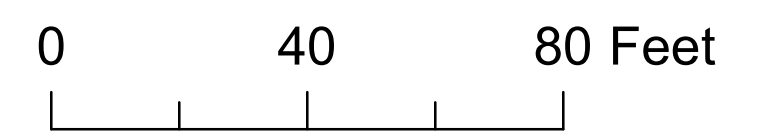
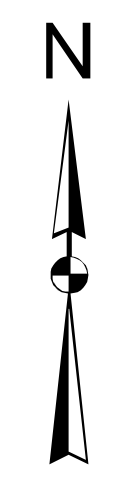
1. Scrap metal, leaf litter and debris and other miscellaneous debris stored in uncovered areas are potential stormwater pollutants. We recommend that these materials be routinely removed from the site to reduce potential stormwater impacts.

APPENDIX A – Site Map

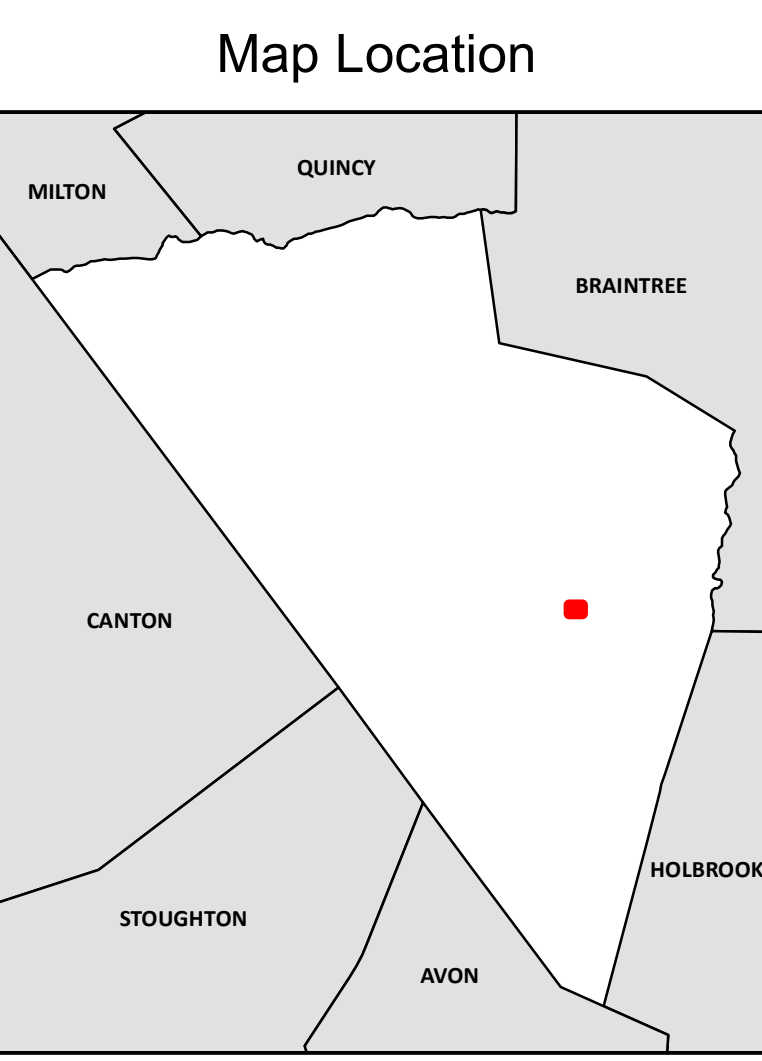


Map 1 of 1
DPW Yard
 4 Carlino Way
Town of Randolph, MA
SWPPP Map

- Stormwater Legend**
- Private DMH
 - Town-Owned DMH
 - Town-Owned CB
 - Private CB
 - ◆ Inlet
 - ▲ Outfall
 - ⊕ BMP
 - Pipe
 - ➔ Surface Water Flow Direction



Plot Date: 6/26/2020



APPENDIX B – Vehicle Inventory

APPENDIX B
VEHICLE INVENTORY
DEPARTMENT OF PUBLIC WORKS
4 CARLINO WAY
RANDOLPH, MASSACHUSETTS

DPW HIGHWAY VEHICLES AND EQUIPMENT							
DPW #	DESCRIPTION	REGISTR	FUEL	CONDITION	RADIO	MILES/HOURS	VIN #
1	2018 Ford Explorer	M99055	G	NEW	N	7700	1FM5K8D84JGA57997
2	2003 Chevy Blazer	M54992	G	POOR	Y	65896	1GNCT18X83K147114
2a	2003 Chevy PU	M65858	G	POOR	Y	116611	1GCEK19VX3E249143
3	2006 INT Dump	M72389	D	FAIR	Y	15257	1HTWDAAR46J326584
4	2015 INT Dump	M15730	D	GOOD	Y	850	1HTWDAAR1FH736038
4a	2016 INT Dump	--	D	GOOD	Y	800	1HTWDSTR3GH259780
5	1999 INT Dump	M60161	D	FAIR	Y	37610	1HTSDAAR2XH659762
6	1999 INT Dump	M60151	D	FAIR	Y	42989	1HTSDAAR0XH659761
7	2011 Chevy Utility	M7668	D	GOOD	Y	15791	1GB3KZCLOBF241532
8	2012 Chevy Utility	M39553	D	GOOD	Y	16586	1GC3KZC87CF221674
9	1992 Chevy Dump	M7635	D	POOR	Y	30930	1GBM7H1J1N1J100925
10	2006 INT CB cleaner	M72388	D	GOOD	Y	10086	1HTWDAAR26J326583
11	1994 INT Sander	M63262	D	POOR	Y	319062	1HTSDN2NXRH567160
12	1988 INT Sander	M63269	D	POOR	Y	140643	1HTLCZWN3JH623307
13	1978 Mack Dump	M26217	D	POOR	Y	54750	R487P-2337
14	1988 INT Sander	M64875	D	POOR	Y	175284	1HTLCZWN1JH579193
15	1986 INT Sander	M34720	D	POOR	Y	49868	1HTLAHGP4GHA16926
16	2009 Ford 1 ton dump	M41693	D	GOOD	Y	17379	1LFD AF57R59EA61246
17	2003 Chevy 1 ton dump	M39552	D	FAIR	Y	73898	1GBJK34183E252285
18	2015 Ford 1 ton dump	M54991	D	GOOD	Y	127	1LFDUF4HT4FEC42058
19	1996 Utility truck	M64332	G	FAIR	Y	158670	1HTSCAAM8VH432998
20	2007 Volvo loader	M7643	D	FAIR	Y	44940 hrs	DW624GB539595
21	1995 JD loader	M55620	D	POOR	Y	3517 hrs	DW544GB550335
22	2002 JD loader	M7649	D	FAIR	Y	2635 hrs	T0410GX903147
23	2013 ELGIN Sweeper	M64349	D	GOOD	Y	385 hrs	1J9VM3H48TC172058
24	1987 DE-ICER	M87042	D	POOR	Y	124056	1FDNF70KXKVA16741
0	1988 INT Sander	M82987	D	POOR	Y	309297	1HSHBAHNXTH341034
25	2004 Sweeper	M45226	D	FAIR	Y	4626 hrs	1FVAB6BV34M31607
27	2003 Bobcat	M26388	D	FAIR	Y	3782 HRS	519033166
28	2014 CAT Skid Steer	M49844	D	GOOD	N	138HRS	511526040
29	1986 Compressor	M7652	D	POOR	N	1443 HRS	004-92097
BM1	1990 Bombardier	M41666	D	POOR	Y	2573 HRS	901900033
BM2	1994 Bombardier	M64326	D	FAIR	Y	2697 HRS	LD33618U615238Y
TRAC-1	1997 Snowblower	M38010	D	FAIR	Y	888 HRS	MT5T1007
TRAC-2	1997 Snowblower	M61850	D	FAIR	Y	902 HRS	MT51008
TRAC-3	2003 Snowblower	M74204	D	GOOD	Y	1509 HRS	MT5T2202
TRAC-4	2011 Snowblower	M83979	D	GOOD	Y	267 HRS	MT61444
BUTR1	1996 Bucket truck	M80280	D	FAIR	Y	10205 HRS	1HTSDAAN0TH294652
M1	1999 Chevy PU	M54949	D	POOR	Y	113555	1GCHK34F3XF067292
TR1	2002 Trailer	M41665	N/A	FAIR	N	NA	4K8NX162921D84869
TR2	1985 Trailer	M41664	N/A	FAIR	N	NA	10HHSE148F100316
TR3	1988 Trailer	M46407	N/A	FAIR	N	NA	1S9TS2126J1132133
CH-1	1998 Brush Chipper	M38883	G	FAIR	N	604 HRS	1VRN15175W1002096
MT-1	1986 Mower/Trimmer	M63273	D	POOR	N	2752 HRS	U 28148
--	1999 JET TRUCK	OFF LINE	D	--	--	--	--
31	1999 CHEVY PU	M91272	D	POOR	Y	124914	1GBHK34F8XF067700
32	2011 CHEVY UTIL	M49868	D	GOOD	Y	22613	1GB3KZCLOBF241532
33	2015 FORD PU	M92218	D	GOOD	Y	4816	1FDRF3BT3FEA00595
34	1992 UTIL VAN	M45207	G	POOR	Y	253741	1GBKP32K2N3314926
35	2015 FORD PU	MM92219	D	GOOD	Y	5128	1FDR3BT5FEA00596
36	1987 INT DUMP	M36509	D	POOR	Y	41350	1HTLAHGPXHHA14373
38	2008 COMPRESS	M7671	D	GOOD	N	682 HRS	B4-6B-2087
39	TRACK EXCAVATOR	NA	D	GOOD	Y	839 HRS	--
42	2003 FORD PU	M65857	D	FAIR	Y	79787	1FDSF31P73EC09937
43	2009 UTIL CRANE	M53197	D	GOOD	Y	45513	1FDAF47R09EA61245
44	2015 VACTOR	M90654	D	FAIR	Y	88 HRS	1HTWKAZR2FH523206

APPENDIX C –Summary of Site Activities and Potential Stormwater Pollutants

APPENDIX C: Summary of Site Activities and Potential Stormwater Pollutants

Activity	Description	Building Reference	Material Inventory	Potential Stormwater Pollutants	Quantity	Potential Exposure to Stormwater	Management Practices	
							Structural	Non-structural
Vehicle Fueling	Fueling of Town-owned and operated vehicles	2	Gasoline Diesel Fuel	Petroleum Hydrocarbons	3,000-gal UST 3,000-gal UST	Low - underground storage and piping High - spill during fueling	Dispenser pad containment	Spill Kit in Close Proximity
Vehicle Maintenance	Maintenance of Town-owned and operated vehicles	8	Motor Oil Hydraulic Fluid Lubricants Transmission Fluid Waste Oil Antifreeze Coolant Brake Fluid Used Batteries Used Tires	Petroleum Hydrocarbons Petroleum Hydrocarbons Petroleum Hydrocarbons Petroleum Hydrocarbons Petroleum Hydrocarbons Ethylene glycol Ethylene glycol Acid Solids, polycyclic aromatic hydrocarbons	Varies	Low - in covered bldg	Floor Drains to storm drain system	Maintenance conducted inside building, good housekeeping, catchbasin and oil/water separator cleaning
Vehicle Washing	Washing of Town-owned and operated vehicles	5	Detergents	Surfactants Wastewater	Varies	High - direct discharge of uncontained washwater to stormwater system	Storm drain	Good housekeeping practices
Construction Materials	Storage and handling of construction materials and miscellaneous maintenance products (gravel, loam, aggregates, etc.)	1	Asphalt	Petroleum Hydrocarbons	Varies	Low - covered storage	Covered storage	Catchbasin cleaning and good housekeeping
		2	Recycled material	Sediment		High - not covered, not stored in paved areas	N/A	Routine sweeping and good housekeeping
		2	Road fill	Sediment		High - not covered, not stored in paved areas		Routine sweeping and good housekeeping
		2	Street sweepings	Sediment, debris		High - not covered, not stored in paved areas		Routine sweeping and good housekeeping
		3/4	Brush/Compost	Nutrients, debris		High - not covered, not stored in paved areas		Routine removal from site
		2	Castings, blocks	Metals		High - not covered, not stored in paved areas		Routine sweeping and good housekeeping
		3	Scrap Metal	Metals		High - not covered, not stored in paved areas		Removed from site when full
Sand/Salt Storage and Handling	Storage and handling of sand/salt for winter roadway applications	1	Sand	Sediment	100 cy (approx.)	High - not covered	Covered storage for salt	Routing sweeping
			Salt	Chlorides	5,000 cy (approx.)	Low - covered storage		Good housekeeping practices
Above Ground Storage Tanks	Building 5 Heating	5	Fuel oil	Petroleum Hydrocarbons	500-gal	Low - stored in covered area	N/A	Spill Kit in Close Proximity
	Waste oil	5	Waste Oil	Petroleum Hydrocarbons	300-gal	Low - stored in covered area with secondary containment	Secondary containment	Good housekeeping practices
Emergency Generators	Facility back-up generator	3	Diesel Fuel	Petroleum	10-gal (approx.)	Low - petroleum products are stored in generator in a covered building	Covered storage	Spill Kit on-site
Solid Waste Management	Two dumpsters	1	Solid waste	Debris, metals	Varies	Low - potential pollutants are covered	Covered storage	Solid waste removal Good housekeeping practices
Parking Areas	Parking for Town employees at the Administration Building and DPW Yard	2/5	N/A	Sediment, oil from vehicles	Varies	High - uncovered parking area, direct discharge to catchbasins during storm event	Catchbasin maintenance	Routine sweeping Good housekeeping practices
Adminstration	Town administrative offices, and public meeting space	2	Miscellaneous equipment and supplies	Paints, cleaning supplies, etc.	Varies	Low - stored in covered areas	Covered storage	Good housekeeping practices

APPENDIX D – SWPPP Inspection Form

Report No. _____

STORMWATER POLLUTION PREVENTION PLAN (SWPPP) INSPECTION FORM

Location:	Department of Public Works: 4 Carlino Way	Date:		Last Insp:	
		Arrive:		Leave:	
Inspector:					
Recent Rainfall:		Current Weather:			
Unidentified Discharges? Spills?					
Add. Info:					

CONTROL MEASURES/ACTION REQUIRED: YES NO
(INSPECT FOR ALL APPLICABLE CONTROLS LISTED)

Control	Condition	Required Action	Completed (by)	Date
<input type="checkbox"/> Fuel Dispensing Area BMPs			<input type="checkbox"/>	
<input type="checkbox"/> Vehicle Washing Area BMPs			<input type="checkbox"/>	
<input type="checkbox"/> Vehicle Repair Indoors			<input type="checkbox"/>	
<input type="checkbox"/> Pavement Sweeping			<input type="checkbox"/>	
<input type="checkbox"/> Trash Management			<input type="checkbox"/>	
<input type="checkbox"/> Spill Prevention & Response			<input type="checkbox"/>	
<input type="checkbox"/> Erosion & Sediment Controls			<input type="checkbox"/>	
<input type="checkbox"/> Manage Runoff			<input type="checkbox"/>	
<input type="checkbox"/> Salt Storage Area			<input type="checkbox"/>	
<input type="checkbox"/> Drainage Swale			<input type="checkbox"/>	
<input type="checkbox"/> Oil/Water Separator			<input type="checkbox"/>	
<input type="checkbox"/> Other			<input type="checkbox"/>	

FAILED CONTROL MEASURES REQUIRE REPLACEMENT: YES NO

Control	Condition	Required Action	Completed (by)	Date
<input type="checkbox"/>			<input type="checkbox"/>	

SWPPP CHANGES: YES NO

Control	Change	Completed (by)	Date
<input type="checkbox"/>		<input type="checkbox"/>	

MANAGEMENT PRACTICES

1. Minimize or Prevent Exposure: To the extent practicable either locate materials and activities inside, or protect them with storm-resistant coverings in order to prevent exposure to rain, snow, snowmelt and runoff (although significant enlargement of impervious surface area is not recommended). Materials do not need to be enclosed or covered if stormwater runoff from affected areas will not be discharged directly or indirectly to surface waters or to the MS4 or if discharges are authorized under another NPDES permit.
2. Good Housekeeping: Keep clean all exposed areas that are potential sources of pollutants, using such measures as sweeping at regular intervals. Ensure that trash containers are closed when not in use, keep storage areas well swept and free from leaking or damaged containers; and store leaking vehicles needing repair indoors.
3. Preventative Maintenance: Regularly inspect, test, maintain, and repair all equipment and systems to avoid situations that may result in leaks, spills, and other releases of pollutants in stormwater to receiving waters. Inspections shall occur at a minimum once per quarter.
4. Spill Prevention and Response: Minimize the potential for leaks, spills, and other releases that may be exposed to stormwater and develop plans for effective response to such spills if or when they occur. At a minimum, the permittee shall have procedures that include:
 - a. Preventive measures such as barriers between material storage and traffic areas, secondary containment provisions, and procedures for material storage and handling.
 - b. Response procedures that include notification of appropriate facility personnel, emergency agencies, and regulatory agencies, and procedures for stopping, containing, and cleaning up leaks, spills and other releases. Measures for cleaning up hazardous material spills or leaks shall be consistent with applicable Resource Conservation and Recovery Act (RCRA) regulations at 40 CFR section 264 and 40 CFR section 265. Employees who may cause, detect, or respond to a spill or leak shall be trained in these procedures and have necessary spill response equipment available. If possible, one of these individuals should be a member of the Pollution Prevention Team; and
 - c. Contact information for individuals and agencies that shall be notified in the event of a leak, spill, or other release. Where a leak, spill, or other release containing a hazardous substance or oil in an amount equal to or in excess of a reportable quantity established under 40 CFR section 110, 40 CFR section 117, or 40 CFR section 302, occurs during a 24-hour period, the permittee shall notify the National Response Center (NRC) at (800) 424-8802 in accordance with the requirements of 40 CFR section 110, 40 CFR section 117, and 40 CFR section 302 as soon as the permittee has knowledge of the discharge. State or local requirements may necessitate reporting spills or discharges to local emergency, public health or drinking water supply agencies, and owners of public drinking water supplies. Contact information shall be in locations that are readily accessible and available.
5. Erosion and Sediment Control: Use structural and non-structural control measures at the facility to stabilize and contain runoff from exposed areas and to minimize or eliminate onsite erosion and sedimentation.
6. Management of Runoff: Manage stormwater runoff from the facility to prevent or reduce the discharge of pollutants. This may include management practices which divert runoff from areas that are potential sources of pollutants, contain runoff in such areas, or reuse, infiltrate or treat stormwater to reduce the discharge of pollutants.
7. Salt Storage Piles or Piles Containing Salt: Prevent exposure of the storage pile to precipitation by enclosing or covering the storage piles. Such piles shall be enclosed or covered within two (2) years of the permit effective date. Implement appropriate measures (e.g., good housekeeping, diversions, containment) to minimize exposure resulting from adding to or removing materials from the pile. Store piles in such a manner as not to impact surface water resources, ground water resources, recharge areas, and wells.