

Town of Stow, MA



Highway Department / Cemetery Division

16 Crescent Street

Stow, MA

01775

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Cemeteries Located At:

Hillside Cemetery – 45 Crescent Street

Lower Village Cemetery – 95 Great Road

Brookside Cemetery – 136 Gleasondale Road

STORMWATER POLLUTION PREVENTION PLAN

Last Updated: June 21st, 2022

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This project has been financed with Funds from the Massachusetts Department of Environmental Protection (the Department). The contents do not necessarily reflect the views and policies of the Department, nor does the mention of trade names or commercial products constitute endorsement or recommendation for use.

SECTION 1 – Introduction

This Stormwater Pollution Prevention Plan (SWPPP) has been developed by Stow, MA to address the requirements of the United States Environmental Protection Agency's (USEPA'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.

SECTION 2 – Detailed Facility Assessment

2.1 Facility Summary

The Stow, MA Cemetery Division is located at 16 Crescent Street Stow, MA 01775 and is owned and operated by Stow, MA. The Locus Map in **Figure 2-1** shows the location of the facility within the Stow, MA.

The Highway Department / Cemetery Division 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 ##DATE. The inspection was conducted by ##NAME.

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 Stow, MA Cemetery Division 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: Steve Nadeau
Title: Superintendent of Streets

Office Phone: (978)-897-8071
Cell Phone: N/A

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.

Figure 2-1. Locus Map



Member: Robert Gledhill
Title: Cemetery Crew Chief

Office Phone: (978)-461-1403
Cell Phone: N/A

Responsibilities: Implements the preventative maintenance program; oversees good housekeeping activities; serves as spill response coordinator; conducts inspections; assists with employee training programs; conducts visual monitoring. Assists in all components of the stormwater program, as needed. Maintains spill kits at Stow, MA Cemetery Division.

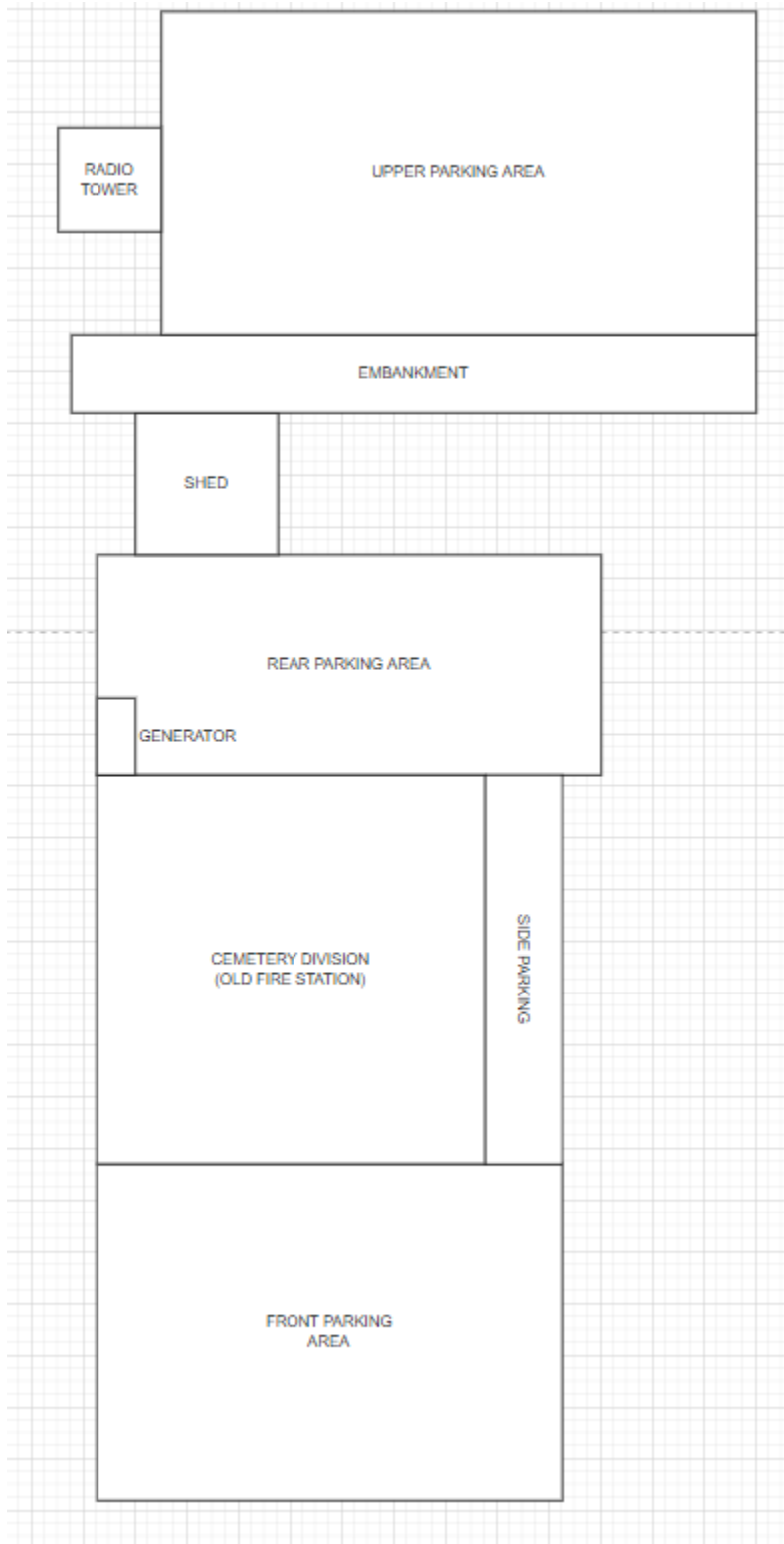
2.4 Facility Description

The primary purpose of the Cemetery Division (Old Fire Station) is to serve the taxpayers of Stow, MA by maintaining the three cemeteries in town as well as providing burial services. Activities at the site are described in **SECTION 2.7**

The facility covers approximately 1 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. Components shown on the site map include:

- Location of floor drains
- Chemical storage areas
- Fertilizer storage areas
- Materials stockpiles
- Waste disposal areas.

Figure 2-2. Site Map



2.5 Facility Structures

Vehicle Storage and Maintenance

Buildings at Cemetery Division (Old Fire Station) are used to provide Stow, MA personnel with heated, covered areas in which to complete minor maintenance, oil changes and preparation of vehicles, equipment, and tools for use at locations around Stow, MA.

The main building is located at the central-west portion of the property. Activities in this structure include minor equipment maintenance, . This building contains ##VALUE floor drains, which discharge to ##OIL/WATER SEPARATOR or ##TIGHT TANK.

Maintenance and Storage Buildings

Carpentry, electrical, and minor maintenance activities are completed in the Old Fire Station. This building contains several floor drains and is fully enclosed. Small equipment, signage, and tools are also stored here along with latex paint, spray paint, and similar products. These products are properly stored in flammable materials storage cabinets.

Administrative Buildings

The Cemetery Division (Old Fire Station) Administrative offices are located at the eastern portion of the main building. This building includes administrative space, office space, a break room and toilet facilities.

Emergency Generators

An emergency generator located at the center portion of the facility provides backup power to the facility during outages. The generator, Kohler Power Series 60, is exposed but has 110% containment of its 1000-gallon natural gas tank. The generator is not located on a pervious surface.

Parking Areas

There are several designated parking areas at the Cemetery Division (Old Fire Station), each of which is an impervious surface. These parking lots are used primarily for visitors to the Cemetery Division (Old Fire Station), Stow, MA-owned cars for daily use by Cemetery Division (Old Fire Station) employees, and employees' personal vehicles; Cemetery Division (Old Fire Station) trucks and/or heavy equipment are not kept in this parking lot.

The Old Fire Station contains parking for 6+ vehicles. The Shed contains parking for 1-2 vehicles. The parking lots contains parking for 11 vehicles. The total number of parking spaces at the Cemetery Division (Old Fire Station) is approximately 15.

2.6 Site Drainage

No stormwater from adjacent properties impacts the Cemetery Division (Old Fire Station) property.

Sheet Flow

Drainage from the impervious surfaces at the Cemetery Division (Old Fire Station) is directed partially to the southernmost portion of the property where it joins regular runoff on Crescent Street and is collected by catch basins on the road.

Engineered Drainage

Engineered drainage at the Cemetery Division (Old Fire Station) includes approximately 1 catch basin. Maintenance of the catch basin structures, including sediment removal, is completed by the Highway Department / Cemetery Division.

2.6.1 Receiving Waters

The final point of discharge for stormwater from this site is the surface water, which has not been identified as impaired. The good housekeeping practices, preventative maintenance and Best Management Practices implemented at the facility are appropriate and adequate controls.

Impairments of this water body are shown in **Table 2-1**, below.

**Table 2-1. Impaired Waters Receiving Drainage from the Facility
 Cemetery Division (Old Fire Station)**

Water Body Name	ID	Category	Impairment(s)

There are no types of impairments documented for this surface water. The activities and stored materials at the Cemetery Division (Old Fire Station) do not have the potential to affect these impairments.

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.

2.7 Site Activities

The following activities occur at the facility:

- Facility or Building Maintenance
- Chemical unloading, handling, and storage (including paint, flammables, fertilizers, and pesticides)
- Painting
- Tool storage
- Vehicle and equipment storage
- Vehicle and equipment maintenance/repair (including oil changes)
- Vehicle and equipment washing
- Waste Handling and Disposal
- Waste oil storage.

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

The Cemetery Division (Old Fire Station) 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 Division (Old Fire Station).

No solvent-based parts washers were observed in any structure at the Cemetery Division (Old Fire Station). Any hazardous materials are either collected by a third party vendor contracted by the Stow, MA on an annual basis, or collected at the annual Household Hazardous Waste Day (HHHD) that is hosted for the benefit of Stow, MA residents. Waste materials from Cemetery Division (Old Fire Station) operations that may be collected at the annual HHHW Day include used motor vehicle fluids that cannot be utilized for the waste oil burner, such as used antifreeze and brake fluid. Any oil that may be contaminated with antifreeze, brake fluid, paint, or other additive that makes it

unburnable in the waste oil furnace is also collected on the HHHW Day instead of being used in the waste oil furnace. These materials are properly labeled and stored using appropriate Best Management Practices between the time of generation and disposal.

The Highway Department / Cemetery Division does not apply or utilize fertilizers, herbicides, or pesticides at any facility owned or managed by the Stow, MA. As such, no fertilizers, herbicides, or pesticides are stored at the Cemetery Division (Old Fire Station).

2.7.5 Snow Dump

Potential Sources of Stormwater Pollution

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

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

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

Pollution Prevention

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

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

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

be maintained during the growth season to filter pollutants out of meltwater. Prior to using the site for snow disposal, all debris should be cleared.

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

Except under the most extraordinary of circumstances, when all land-based snow disposal options have been exhausted, snow should not be dumped into any body of water. When this option is necessary, requirements of “Snow Disposal Guidance” (BRPG01-01) issued by MassDEP on March 8, 2001, shall be followed.

2.7.6 Use or Storage of Pesticides or Fertilizers

Potential Sources of Stormwater Pollution

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

Pollution Prevention

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

Fertilizers and pesticides should always be stored indoors in well-ventilated, dry locations. Floors of storage areas should be 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. For more information, please refer to SOP 4 “Spill Response and Cleanup Procedures,” and SOP 12 “Storage and Use of Pesticides and Fertilizer,” both included in **Appendix A**.

2.7.7 Vehicle and Equipment Storage

Potential Sources of Stormwater Pollution

Vehicle and equipment storage activities are a potential source of pollution due to the diesel fuel, gasoline, oil, hydraulic fluid, antifreeze and similar hazardous material or fuel the machinery may contain. In addition, vehicles or machinery may pick up pollutants during 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 or within a building with a common drain. Discharge to this drain shall be managed by an oil/ water separator (refer to SOP 11, “Oil/Water Separator Maintenance”, included in **Appendix A**) to remove oils and gasoline. Vehicle washing activities shall not be completed in areas served by an oil/water separator.

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

2.7.8 Vehicle and Equipment Maintenance/Repair

Potential Sources of Stormwater Pollution

Vehicle and equipment maintenance and repair often 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 or within a building with a common drain. Discharge to this drain shall be managed by an oil/ water separator (refer to SOP 11, “Oil/Water Separator Maintenance”, included in **Appendix A**) to remove oils and gasoline.

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

2.8 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

Vehicle Type	Number on Site
Chevrolet 2500	1
Kubota Tractor	2

2.9 Location of Leak and Spill Cleanup Materials

Leak and spill cleanup materials are stored at Cemetery Division (Old Fire Station) 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
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Old Fire Station	Vehicle Bay	Speedi-Dri

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:

It has been determined that the above non-stormwater discharges at #FACILITY 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 Division (Old Fire Station) 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 Division (Old Fire Station)**

Material	Storage Location	Quantity	Potential Pollutant	Covered (C) or Enclosed (E)	Likelihood of Contact with Stormwater
Petroleum-Based Compounds					
Diesel fuel		20gal	Petroleum hydrocarbons	E	0%
Gasoline		20gal	Petroleum hydrocarbons	E	0%
Hydraulic Fluid		1 gal	Petroleum hydrocarbons	E	0%
Motor Oil		5 gal	Petroleum hydrocarbons	E	0%

Material	Storage Location	Quantity	Potential Pollutant	Covered (C) or Enclosed (E)	Likelihood of Contact with Stormwater
Lubricants		2gal	Petroleum hydrocarbons	E	0%
Transmission Fluid		2gal	Petroleum hydrocarbons	E	0%
Total Volume of Oil At Facility =					40 gal
Non-Petroleum Significant Materials					
Antifreeze			Ethylene glycol; potential source of BOD		0%
Spray Lubricant			Petroleum hydrocarbons		0%
Batteries, Used Lead Acid			Lead, sulfuric acid; possible particulate matter and residual oil		0%
Brake Fluid			Volatile organic compounds; non-petroleum based oil		0%
Coolant (new or used)			Volatile organic compounds		0%
Fertilizers			Nutrients		0%
Paint, Latex			Petroleum constituents, including volatile and semivolatile organic compounds		0%
Paint, Oil-Based			Petroleum constituents, including volatile and semivolatile organic compounds		0%
Paint, Spray			Petroleum constituents, including volatile and semivolatile organic compounds		0%
Herbicides			Volatile and semivolatile organic compounds		0%

Material	Storage Location	Quantity	Potential Pollutant	Covered (C) or Enclosed (E)	Likelihood of Contact with Stormwater
Spill response material (Speedi Dri or similar)			Particulate matter, solids, residual oil.		0%

2.13 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 Division (Old Fire Station) ##DOES/##DOES NOT have aboveground oil storage capacity that exceeds 1,320 gallons.

2.14 List of Significant Leaks or Spills

Significant leaks or spills that occurred at the Cemetery Division (Old Fire Station) in the last three years are shown in **Table 2-6**.

**Table 2-6. Significant Leaks or Spills
 Cemetery Division (Old Fire Station)**

Building or Area	Material	Volume

Forms included in **Appendix B** will be used to document any spill or leak that occurs at the facility in the future.

2.15 Structural BMPs

Structural BMPs include onsite constructed systems that provide pretreatment or treatment of stormwater flows. The following structural BMPs are presently used at the Cemetery Division (Old Fire Station) to maintain water quality.

2.16.1 Pretreatment Structural BMPs

- Oil/Grit Separators

2.16.2 Treatment Structural BMPs

- Vegetated swale
- Infiltration berm & retentive grading

2.17 Sediment and Erosion Control

Site topography at the Cemetery Division (Old Fire Station) prevents drainage of stormwater and any associated sedimentation from entering the Stow, MA storm drain system or discharging directly to a water body.

2.18 Individual Cemeteries

2.18.1 Hillside Cemetery: No onsite storage of materials or equipment. The only activities that occur at this location are mowing and weed-whacking; with mowers stored off-site.

2.18.2 Lower Village Cemetery: No onsite storage of materials or equipment. The only activities that occur at this location are mowing and weed-whacking; with mowers stored off-site. This Cemetery is still accepting burials, albeit only cremations.

2.18.3 Brookside Cemetery: Onsite storage of equipment is limited to hand-tools and small power equipment (weed-whackers, pruners, etc.). The only activities that occur at this location are mowing and weed-whacking; with mowers stored off-site. This Cemetery is still accepting burials.

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 washing of vehicles is performed within the designated vehicle wash bay.
- All fluid products and wastes are kept indoors.
- Fueling of small equipment is completed indoors.
- All floor drains present within garage bays drain to an oil/water separator.
- Spill materials and cleanup kits are maintained at all locations where oil materials are used, stored, or may be present, including at Fuel Islands.
- Used spill cleanup materials are disposed of properly.
- Materials are stored indoors or in covered areas to minimize exposure to stormwater.
- No fertilizers, herbicides, or pesticides are stored or used at the facility.
- 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 Division (Old Fire Station) was shown in **Table 2-3**.

3.2 Preventative Maintenance

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

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

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

3.3 Best Management Practices

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

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

1. Follow Standard Operating Procedures (s) during delivery of waste oil to the equipment/waste oil storage bay. These SOPs are included in **Appendix A**.
2. Follow Standard Operating Procedures during delivery of bulk oil to the emergency generator and bulk fuel to the Fuel Island. These SOPs are included in **Appendix A**.

3. Minimize the volume of gasoline stored within the buildings and on the site.
4. Clean up any oil spills observed in the parking lot, garages, or other surfaces in a timely manner.
5. Monitor all material deliveries.
6. Inspect all storage tanks prior to filling activities for spills, leaks and corrosion.

3.4 Spill Prevention and Response

The following procedures apply to the facility:

- All personnel are instructed in location, use, and disposal of spill response equipment and supplies maintained at the site such as oil absorbent materials.
- The Pollution Prevention Team leader will be advised immediately of all spills of hazardous materials or regulated materials, regardless of quantity.
- Spills will be evaluated to determine the necessary response. If there is a health hazard, fire or explosion potential, 911 will be called. If a spill exceeds five gallons or threatens surface waters, including the storm drain system, state or federal emergency response agencies will be called.
- Spills will be contained as close to the source as possible with oil-absorbent materials. Additional materials or oil-absorbent socks will be utilized to protect adjacent catch basins.

SECTION 4 – Plan Implementation

4.1 Employee Training

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

Highway Department / Cemetery Division is responsible for stormwater management training for Cemetery Division (Old Fire Station) employees. This position coordinates training related to stormwater management on at least an annual basis to review specific responsibilities for implementing this SWPPP, what and how to accomplish those responsibilities, including BMP implementation.

Additionally, general awareness training is provided regularly (preferably annually) to all employees whose activities 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. **Appendix C** contains copies of training documentation from these training activities including attendance sheets, instructor name and affiliation, date, time, and location of the training.

4.2 Site Inspection Requirements

It is required that the entire Cemetery Division (Old Fire Station) 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). ##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 in **Appendix D**.

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 Division (Old Fire Station) ADMINISTRATIVE OFFICE, Highway Department / Cemetery Division OFFICE and shall be updated if any of the conditions in **SECTION 2.21** occur. The SWPPP and records shall be made available to state or federal inspectors and the general public upon request.

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

Inspections of the Cemetery Division (Old Fire Station) 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 Division (Old Fire Station) is in compliance with the 2016 Massachusetts MS4 Permit.

4.4 Triggers for SWPPP Revisions

Stow, MA 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.



Authorized Official

Superintendent of Streets

Title

6/30/2022

Date

Instructions: The SWPPP must be signed by a ranking elected official or by a duly authorized representative of that person. A person is a duly authorized representative only if:

- 1. The authorization is made in writing;*
- 2. The authorization specifies either an individual or a position having responsibility for the overall operation of the regulated facility or activity such as the position of plant manager, operator of a well or a well field, superintendent, position of equivalent responsibility, or an individual or position having overall responsibility for environmental matters for the company. (A duly authorized representative may thus be either a named individual or any individual occupying a named position); and*
- 3. The signed and dated written authorization is included in the SWPPP. A copy must be submitted to EPA, if requested.*