

# Town of Stow, MA



**Police Department  
305 Great Road  
Stow, MA  
01775**

## **STORMWATER POLLUTION PREVENTION PLAN**

**Last Updated: July 21<sup>st</sup>, 2022**

## Stormwater Pollution Prevention Plan – Table of Contents

Section	Page
SECTION 1 – Introduction.....	1
SECTION 2 – Detailed Facility Assessment.....	3
SECTION 3 – Non-Structural Controls.....	12
SECTION 4 – Plan Implementation .....	15
SECTION 5 – SWPPP Certification.....	18

Figure	Page
Figure 2-1. Locus Map .....	4
Figure 2-2. Site Map.....	5

Table	Page
Table 2-1. Impaired Waters Receiving Drainage from the Facility.....	7
Table 2-2. Vehicle Inventory .....	9
Table 2-3. Leak and Spill Cleanup Materials.....	9
Table 2-4. Significant Leaks or Spills.....	11

*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 Town of Stow 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 Town of Stow, MA Police Department is located at 305 Great Road Stow, MA 01775 and is owned and operated by Town of Stow, MA. The Locus Map in **Figure 2-1** shows the location of the facility within the Town of Stow, MA.

The Stow Police 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 7/12/2022. The inspection was conducted by Steve Nadeau.

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 Town of Stow, MA Police Department 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:** Michael Sallese

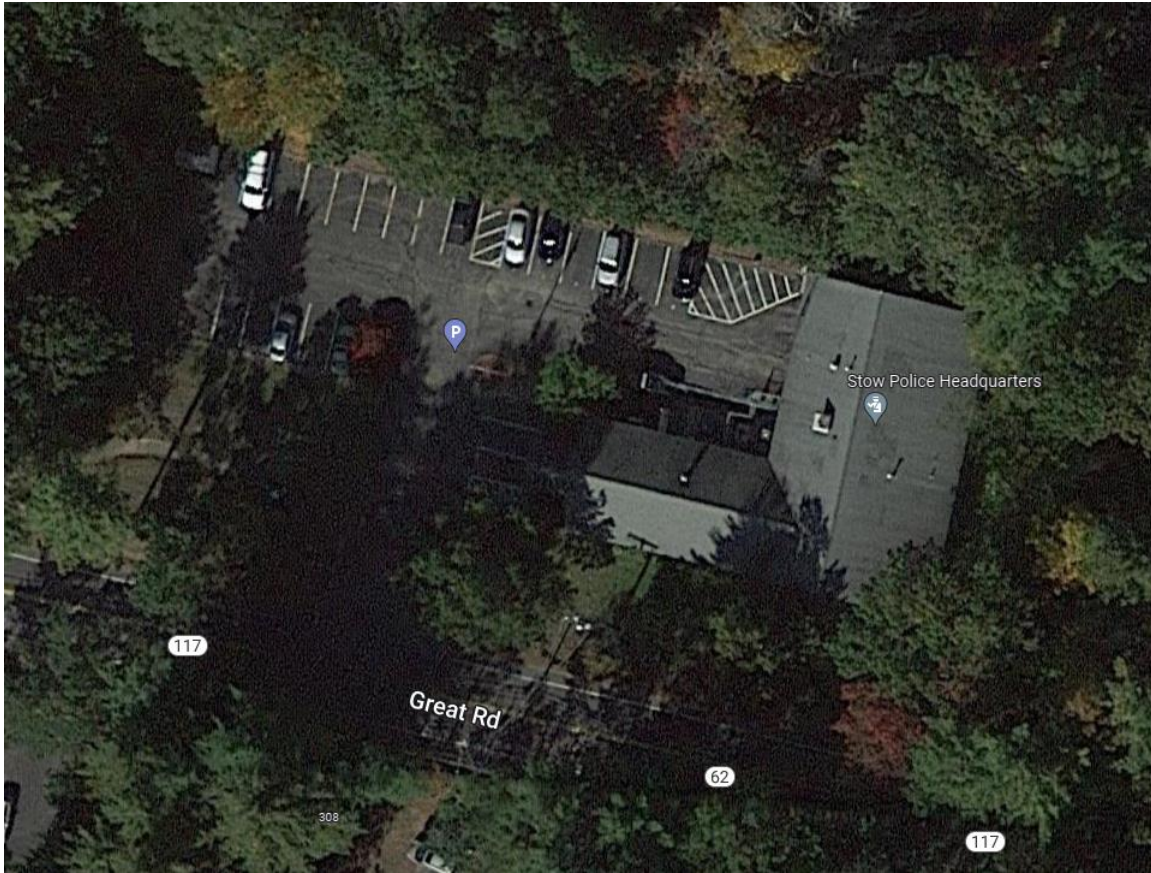
**Title:** Chief of Police

**Office Phone:** 978-897-4545

**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:** Steve Nadeau  
**Title:** Highway Superintendent

**Office Phone:** 978-897-8071  
**Cell Phone:**

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

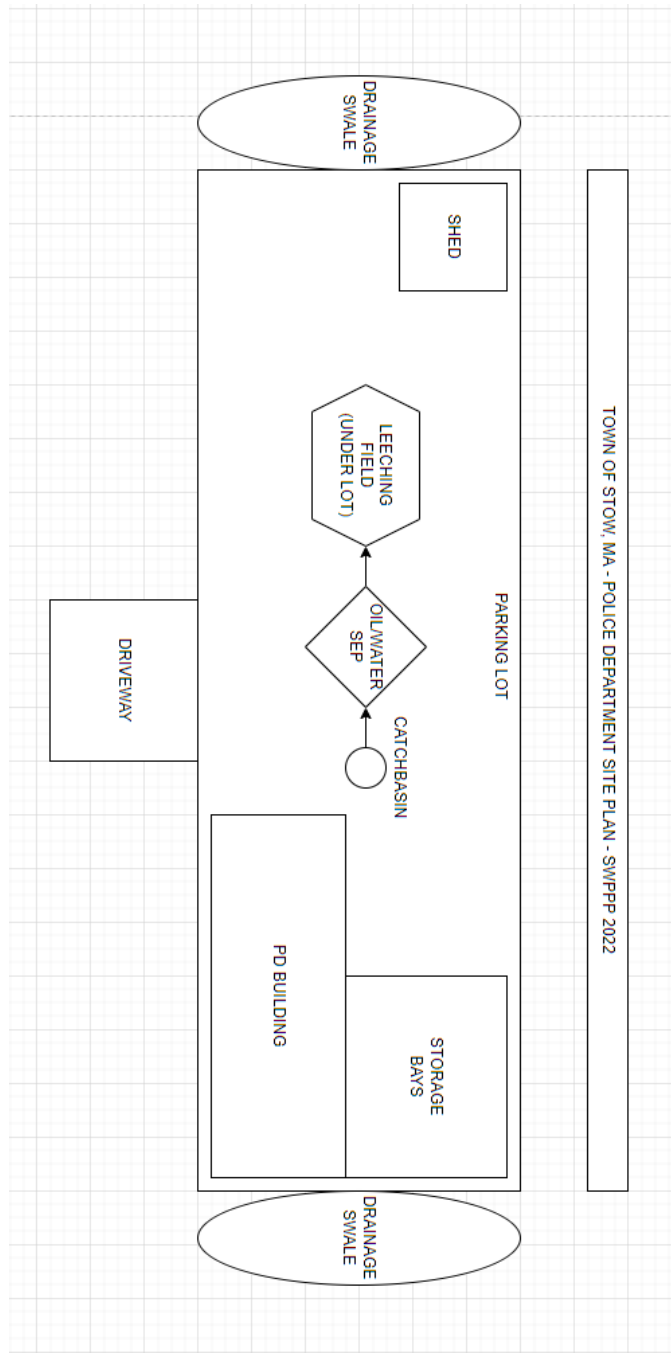
## 2.4 Facility Description

The primary purpose of the Stow, MA Police Department is to provide for the public safety of the residents of Stow, MA and all those passing through the area. Activities at the site are described in **SECTION 2.7**

The facility covers approximately 1.56 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 the engineered drainage system, including catch basins, ditches, drain manholes, and treatment BMPs
- Structural stormwater pollution control measures

Figure 2-2. Site Map



## 2.5 Facility Structures

### Storage Buildings

Small equipment, signage, and tools are stored in the Storage Bays. This building contains no floor drains and is fully enclosed.

### Administrative Buildings

The Police Department Administrative offices are located at the southeastern portion of the property. This building includes administrative space, dispatch office, file storage, lockers & break rooms.

### Emergency Generators

An emergency generator located at the eastern portion of the facility provides backup power to the facility during outages. The generator, Kohler 60kW 60RZ82, is fully contained and is fed by a natural gas hookup to the street. The generator is located on pervious surface.

### Oil/Water Separators

The Town of Stow, MA maintains 1 oil/water/sand/trash separators at Stow Police Department.

Oil/water separator #1 is located at the center portion of the property. This pretreatment structure has a cleanout manhole and is pumped on an annual basis. The Stow Highway Department is responsible for this work or contracting this work and maintains records on the pump-out activities. This oil/water/trash separator provides treatment of flow from all buildings on the lot. Parking lot areas where oil materials are added and/or where vehicles are stored receive pretreatment via this oil/water separator.

### Parking Areas

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

The Police Station parking lot contains parking for approximately 20 vehicles, including police cruisers and motorcycle parking.

## 2.6 Site Drainage

No stormwater from adjacent properties impacts the Stow Police Department property.



Sheet Flow

Drainage from the impervious surfaces at the Police Department is directed partially to the catch basin in the center of the parking lot.

Engineered Drainage

Engineered drainage at the Police Station includes approximately 1 catch basin and 1 oil-water separator. Maintenance of the catch basin structures, including sediment removal, is completed by the Stow Highway Department or its contractor.

**2.6.1 Receiving Waters**

The final point of discharge for stormwater from this site is the infiltration system and secondary overflow to drainage swale, tertiary overflow will flow to Minister’s Pond, 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.

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

Water Body Name	ID	Category	Impairment(s)

The types of impairments documented for this surface water body are related to any impaired waters – there are none for this facility. The activities and stored materials at the Police Department 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.

**2.6.2 Applicable TMDLS**

There are no applicable TMDLS reports.

**2.7 Site Activities**

The following activities occur at the facility:

- Vehicle and equipment 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 Police Department 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 Police Department.

No solvent-based parts washers were observed in any structure at the Stow Police Department. Any hazardous materials are either collected by a third-party vendor contracted by the Town of Stow, MA on an annual basis, or collected at the annual Household Hazardous Waste Day (HHHD) that is hosted for the benefit of Town of Stow, MA residents. Waste materials from Police Department 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 Stow Police Department does not apply or utilize fertilizers, herbicides, or pesticides at any facility owned or managed by the Town of Stow, MA. As such, no fertilizers, herbicides, or pesticides are stored at the Police Department.

### **2.7.1 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.

## 2.8 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
Ford Explorer (Police Model)	6

## 2.9 Location of Leak and Spill Cleanup Materials

Leak and spill cleanup materials are stored at Stow Police Department 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
Garage	Wall	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:

- Lawn watering

It has been determined that the above non-stormwater discharges at Stow Police Department 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

There are no significant materials on-hand at the Police Department. Vehicle maintenance is contracted out.

### 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 Police Department does not have aboveground oil storage capacity that exceeds 1,320 gallons.

### 2.13 Description of Significant Material Storage Areas

The Stow Police Department emergency generator is fueled with FUEL approximately FREQUENCY. The FUEL is delivered to the storage tank which is located within the BUILDING. All bulk delivery of fuel to the emergency generator is monitored by a MUNICIPALITY employee.

### 2.14 List of Significant Leaks or Spills

Significant leaks or spills that occurred at the Stow Police Department in the last three years are shown in **Table 2-4**.

**Table 2-4. Significant Leaks or Spills  
Stow Police Department**

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 Stow Police Department to maintain water quality.

### 2.15.1 Pretreatment Structural BMPs

- Deep sump catch basins
- Oil/Grit Separators

### 2.15.2 Treatment Structural BMPs

- Vegetated swale
- Infiltration berm & retentive grading

### 2.15.3 Other Structural BMPs

- Landscape restoration

## 2.16 Sediment and Erosion Control

Site topography at the Stow Police Department prevents drainage of stormwater and any associated sedimentation from entering the Town of Stow, MA storm drain system or discharging directly to a infiltration system after going through a stormwater separator.

## 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.
- 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 Stow Police Department 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.
- Vehicle storage areas are inspected frequently for evidence of leaking oil.

### 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.

Stow Police Department is responsible for stormwater management training for Stow Police Department 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 Stow Police Department 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). Steve Nadeau (Highway Superintendent) 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 Stow Police Department ADMINISTRATIVE OFFICE, Stow Police Department 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 Stow Police Department 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 Stow Police Department is in compliance with the 2016 Massachusetts MS4 Permit.

#### 4.4 Triggers for SWPPP Revisions

Town of 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

\_\_\_\_\_  
5/3/2022

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.*