



RHODE ISLAND DEPARTMENT OF
ENVIRONMENTAL MANAGEMENT
Office of Water Resources

DEM USE ONLY

Date Received _____

FINAL RIPDES SMALL MS4 ANNUAL REPORT
GENERAL INFORMATION PAGE

RIPDES PERMIT #RIR040 _-029_____

REPORTING PERIOD:

☐ YEAR 7
Jan 2010-Dec 2010

OPERATOR OF MS4

Name: Town of West Greenwich			
Mailing Address: 280 Victory Highway			
City: West Greenwich	State: RI	Zip: 02817	Phone: (401) 392-3800 x121
Contact Person: Jennifer Paquet	Title: Town Planner		
Legal status (circle one): PRI - Private <u>PUB - Public</u> BPP - Public/Private STA - State FED - Federal			
Other (please specify):			

OWNER OF MS4 (if different from OPERATOR)

Name:			
Mailing Address:			
City:	State:	Zip:	Phone: ()
Contact Person:	Title:		

CERTIFICATION

I certify under penalty of law that this document and all attachments were prepared under the direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate 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, I certify that the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.	
Print Name	<u>KEVIN A. BREENE</u>
Print Title	<u>TOWN ADMINIST.</u>
Signature	<u>Kevin A. Breene</u>
Date	<u>3/9/11</u>



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Print Name _____

Print Title _____

Signature _____

Date _____



MINIMUM CONTROL MEASURE #1: PUBLIC EDUCATION AND OUTREACH (Part IV.B.1 General Permit)

SECTION I. OVERALL EVALUATION:

GENERAL SUMMARY, STATUS, APPROPRIATENESS AND EFFECTIVENESS OF MEASURABLE GOALS:

Include information relevant to the implementation of each measurable goal, such as activities, topics addressed, audiences and pollutants targeted. Discuss activities to be carried out during the next reporting cycle. If addressing TMDL requirements, please indicate rationale for choosing the education activity to address the pollutant of concern.

(Note: Identify parties responsible for achieving the measurable goals and reference any reliance on another entity for achieving measurable goals.)

NOTE: In West Greenwich, the Town Planner is responsible, unless otherwise noted.

IV.B.1.b.1	Provide a General Summary of activities implemented to educate your community on how to reduce storm water pollution. For TMDL affected areas, with storm water associated pollutants of concern, indicate rationale for choosing the education activity. List materials used for public education and topics addressed. Summarize implementation status and discuss if the activity is appropriate and effective.
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General activities for educating the community include the on-going distribution of the '10 Simple Things' pamphlet to new residents, updates to the stormwater webpage, and an information booth on stormwater pollution at the annual Land Trust's Earth Day Event. Topics addressed by the pamphlet include, feeding of waterfowl, picking up after pets, limiting fertilizer, proper disposal of household hazardous wastes, septic system maintenance, vehicle fluids, conserving water, how to get involved, and how to file a complaint. The materials used at the 2010 Earth Day Event included a colorful poster display board which addresses dumping in storm drains, car washing, pet waste, composting and recycling, limiting pesticides and fertilizers, septic system care, proper disposal of household hazardous waste, rain gardens, the hydrologic cycle, and how surface water runoff carries pollution. Additional materials included various handouts on rain gardens and rain barrels, EPA's Guide to Understanding Stormwater ('After the Storm'), lawn care, URI and RI Health's Water Quality Protection Factsheets (pet waste, household hazardous products, what you can do about nonpoint source pollution, and water conservation in and around the home), and materials for the Girl Scouts Water Drop Patch Project (which was given to a Girl Scout leader at the 2010 event this year). Also, the Town's Stormwater Webpage has links to or information on lots of topics and explains the importance of being aware of stormwater pollution sources in an interesting way so that everyone can understand it. Implementation is on-going and will continue. These activities are all appropriate and will become more and more effective as the message continues to be repeated.

There are no TMDL's established for West Greenwich.

IV.B.1.b.2	Provide a general summary of how the public education program was used to educate the community on how to become involved in the municipal or statewide storm water program. Describe partnerships with governmental and non-governmental agencies used to involve your community.
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The WG Stormwater Pamphlet, which is also posted on the Town's Stormwater webpage, includes information on how to get involved, including contact information for the following: Pawtuxet River Watershed Council, Wood-Pawcatuck Watershed Association, URI's Watershed Watch, Save the Bay, and the Lake Mishnock Preservation Association. The Lake Mishnock Preservation Association is a local non-governmental organization that is actively involved in water quality issues for the Lake, and attracts others to be involved.

PUBLIC EDUCATION AND OUTREACH cont'd

Additional Measurable Goals and Activities: Please indicate if the following training sessions were attended and list the name(s) and municipal position of all staff who attended the training. (Please note that participation in these trainings was not required.)

Attendance at the following trainings if applicable:

☐ Preview of the Draft MS4 General Permit – Public Education and Involvement Measures (03/12/2010)

Attending name of staff and title: _____ Jennifer Paquet, Town Planner _____

Attending name of staff and title: _____

☐ Preview of the Draft MS4 General Permit – IDDE and Pollution Prevention and Good Housekeeping Measures (04/09/2010)

Attending name of staff and title: _____ Jennifer Paquet, Town Planner _____

Attending name of staff and title: _____

☐ Preview of the Draft MS4 General Permit – Construction and Post-Construction Measures (07/08/2010)

Attending name of staff and title: _____

Attending name of staff and title: _____

☐ RI Stormwater Design and Installation Manual – Final Draft Informational Session (05/26/2010, 06/02/2010)

Attending name of staff and title: _____ (*June 3, 2010 Town Planner and Dir. of Public Works-double check with RIDEM)

Attending name of staff and title: _____

☐ Institutionalizing Stormwater Education in Rhode Island (06/03/2010)

Attending name of staff and title: _____

Attending name of staff and title: _____

☐ Demonstration of the new ASIST Program Management Software (08/10/2010)

Attending name of staff and title: _____

Attending name of staff and title: _____

☐ Stormwater Education Training: Using the Enviroscape Model (11/03/2010)

Attending name of staff and title: _____ (Jennifer Paquet , Town Planner attended this in a previous year, on August 13, 2009) _____

Attending name of staff and title: _____

☐ Rhode Island Regulatory Setbacks and Buffers (12/02/2010)

Attending name of staff and title: _____ (Jennifer Paquet , Town Planner attended this in a previous year, on December 3, 2009) _____

Attending name of staff and title: _____

Other Trainings: (Jennifer Paquet, Town Planner also attended: Stakeholder Meeting on the Draft Construction Site Runoff Control Environmental Results Program (ERP) on March 18, 2010)



MINIMUM CONTROL MEASURE #2: PUBLIC INVOLVEMENT/PARTICIPATION (Part IV.B.2 General Permit)

SECTION I. OVERALL EVALUATION:

GENERAL SUMMARY, STATUS, APPROPRIATENESS AND EFFECTIVENESS OF MEASURABLE GOALS:

Include information relevant to the implementation of each measurable goal, such as types of activities and audiences/groups engaged. Discuss activities to be carried out during the next reporting cycle. If addressing TMDL requirements, please indicate rationale for the activities chosen to address the pollutant of concern.

(Note: Identify parties responsible for achieving the measurable goals and reference any reliance on another entity for achieving measurable goals.)

IV.B.2.b.2.ii Describe audiences targeted for the public involvement minimum measure, include a description of the groups engaged, and activities implemented and if a particular pollutant(s) was targeted. If addressing TMDL requirements indicate how the audience(s) and/or activity address the pollutant(s) of concern. Name of person(s) and/or parties responsible for implementation of activities identified. Assess the effectiveness of BMP and measurable goal.

Each year for Earth Day, the Conservation Commission sponsors a Clean-up event for litter. In 2010, this event was sponsored by the West Greenwich Conservation Commission, Lake Mishnock Preservation Association, the New England Mountain Bikers Association, Amgen, the Rhode Island Water Resources Board, and other local businesses. The WG SWMPP lists the Conservation Commission as the responsible party for implementation of this activity. This is a popular activity for participation which has been growing over the years. There are between 100 and 150 volunteer participants. See Attachment 1, photos for types of litter (lots of tires, mattresses, litter) and number of volunteers. The measurable goal listed in the SWMPP is increase in residents participating in cleanups, which is informally tracked with sign-in sheets. Local businesses contribute donations, and employees from local businesses also volunteer.

Also, the general local public is targeted for public participation when the Town advertises public notice of hearings for ordinances pertaining to stormwater management. For instance, in 2010, the Town Council held a properly advertised Public Hearing to adopt amendments to the West Greenwich Stormwater Management Plan. The effectiveness of this is limited to the public participation process of open government, and not really successful in getting people interested in volunteering to help out with water quality. The Town Planner is responsible for posting public notification of hearings related to Stormwater Management.

Additional Measurable Goals and Activities

SECTION II. Public Notice Information (IV.G.2.h and IV.G.2.i) ***Note: attach copy of public notice**

Date of Public Notice: February 23, 2011

How public was notified: Display Advertisement notice in the Kent County Daily Times, color posted notice at Town Hall and in the Louttit Library, and on the Town's website. E-mail notice with link to draft report and Town's Stormwater Webpage sent to Wood Pawcatuck Watershed Association, Pawtucket River Water Authority, Lake Mishnock Preservation Association, Kent County Water Authority, and the RI Water Resources Board. A public view copy of the draft report was posted on Town Planner's door, in the Library, and on the website.

Was public meeting held? YES NO

Date: Held on March 3, 2011 **at 4:30 p.m.** **Where:** at Town Hall

Summary of public comments received: no one attended the hearing.

Planned responses or changes to the program: no comments received during public comment period, no changes planned



MINIMUM CONTROL MEASURE #3: ILLCIT DISCHARGE DETECTION AND ELIMINATION (Part IV.B.3 General Permit)

SECTION I. OVERALL EVALUATION:

GENERAL SUMMARY, STATUS, APPROPRIATENESS AND EFFECTIVENESS OF MEASURABLE GOALS

Include information relevant to the implementation of each measurable goal, such as activities implemented (when reporting tracked and eliminated illicit discharges, please explain the rationale for targeting the illicit discharge) to comply with on-going requirements, and illicit discharge public education activities, audiences and pollutants targeted. Discuss activities to be carried out during the next reporting cycle. If addressing TMDL requirements, please indicate rationale for the activities chosen to address the pollutant of concern.

(Note: Identify parties responsible for achieving the measurable goals and reference any reliance on another entity for achieving measurable goals.)

IV.B.3.b.1:	Indicate if the outfall map was not completed, reasons why, proposed schedule for completion of requirement and person(s)/ Department responsible for completion. (The Department recommends electronic submission of updated EXCEL Tables if this information has been amended.) Date of Completion:
Completed May 4, 2009	
IV.B.3.b.2	Indicate if your municipality chose to implement the tagging of outfalls activity under the IDDE minimum measure, activities and actions undertaken under the 2010 calendar year.
Outfalls were cataloged with GPS latitude and longitude, and photographs. This was completed in a previous reporting year.	
IV.B.3.b.3	Provide a summary of the implementation of recording of system additional elements (catch basins, manholes, and/or pipes). Indicate if the activity was implemented as a result of the tracing of illicit discharges, new MS4 construction projects, and inspection of catch basins required under the IDDE and Pollution Prevention and Good Housekeeping Minimum Measures, and/or as a result of TMDL related requirements and/or investigations. Assess effectiveness of the program minimizing water quality impacts.
GPS coordinates of additional elements (catch basins and outfalls) were taken in 2009 and were submitted with the 2008 report. The cataloging was performed during the January – April Dry Weather Survey. A map of the GPS coordinates was made using the software program that came with the GPS device. Together with the DPW's list of catch basin cleaning, this map can be used to help pinpoint pollution problem areas and vicinity sources; however none have been identified yet as a problem.	
IV.B.3.b.4	Indicate if the IDDE ordinance was <u>not</u> developed, adopted and submitted to RIDEM, explain reasons why, submit proposed schedule for completion and identify person(s) / Department and/or parties responsible for the completion of this requirement. Date of Adoption: If the Ordinance was amended in 2010, please indicate why changes were necessary.
IDDE Ordinance was adopted on June 10, 2009	
IV.B.3.b.5.ii, iii, iv, & v	Provide a summary of the implementation of procedures for receipt and consideration of complaints, tracing the source of an illicit discharge, removing the source of the illicit discharge and program evaluation and assessment as a result of removing sources of illicit discharges. Identify person(s) / Department and/or parties responsible for the implementation of this requirement.

ILLICIT DISCHARGE DETECTION AND ELIMINATION cont'd

The Town's Stormwater Pollution program includes a process for handling complaints. Contact / Hotline number is provided on the Town's Stormwater Web Page and in the '10 Simple Things' pamphlet. The Town Planner has been identified as the contact person to receive and respond on complaints for illegal dumping, which includes coordination with the Director of Public Works and/or Building Official to investigate the complaint. The procedures are explained in the recently amended SWMPP. The Director of Public Works is the person / department responsible for following through under the authority of the IDDE ordinance.

IV.B.3.b.5.vi	Provide summary of implementation of catch basin and manhole inspections for illicit connections and non-storm water discharges. If the required measurable goal of inspecting all catch basins and manholes for this purpose was not accomplished, please indicate reasons why, the proposed schedule of completion and identify person(s) / Department and/or parties responsible for the implementation of this requirement. Evaluate effectiveness of the implementation of this requirement. The operator must keep records of all inspections and corrective actions required and completed.
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The Dir. Public Works is responsible for implementing and documenting this task. During annual catch basin cleaning, all catch basins are inspected for damage, illegal connections, and suspicious fluids. This is an effective action for benefiting water quality, as evidence of any local contamination sources or nearby erosion/litter sources is likely to appear in the catch basins. So far, however, no evidence of contamination has been found.
See attached letter from Dir. DPW about catch basin cleaning and other activities performed by the DPW during 2010.

IV.B.3.b.5.vi i	If dry weather surveys including field screening for non-storm water flows and field tests of selected parameters and bacteria were not completed, indicate reasons why, proposed schedule for the completion of this measurable goal and person(s) / Department and/or parties for the completion of this requirement. Evaluate effectiveness of the implementation of this requirement. The results of the dry weather survey investigations must be submitted to RIDEM electronically, if not already submitted or if revised since 2009, in the RIDEM provided EXCEL Tables and should include visual observations for all outfalls during both the high and low water table timeframes, as well as sample results for those outfalls with flow. Date of Completion:
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Both dry weather surveys were completed 2009 and were sent to RIDEM on May 4, 2009 and September 18, 2009. No flows were observed.

IV.B.3.b.7	Provide a description of efforts and actions taken as a result of for coordinating with other physically interconnected MS4s, including State and federal owned or operated MS4s, when illicit discharges were detected or reported. Identify person(s) / Department and/or parties responsible for the implementation of this requirement. Evaluate effectiveness of the implementation of this requirement.
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No illicit discharges have yet been detected, therefore there has been no need for the Town to initiate coordination with another entity. No abutting physically interconnected MS4 operators have contacted the Town regarding cooperation regarding any illegal discharges. The DPW would be responsible for such coordination.

IV.B.3.b.8	Provide a description of efforts and actions taken for the referral to RIDEM of non-storm water discharges not authorized in accordance to Part I.B.3 of this permit or another appropriate RIPDES permit, which the operator has deemed appropriate to continue discharging to the MS4, for consideration of an appropriate permit. Identify person(s) / Department and/or parties responsible for the implementation of this requirement. Evaluate effectiveness of the implementation of this requirement.
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ILLCIT DISCHARGE DETECTION AND ELIMINATION cont'd

No non-stormwater discharges, that are not otherwise authorized, have been detected. The DPW is responsible for implementing this measure and for coordinating with the Town Planner.

IV.B.3.b.9	Provide a description of efforts and actions taken to inform public employees, businesses, and the general public of hazards associated with illegal discharges and improper disposal of waste, as well as allowable non-storm water discharges identified as significant contributors of pollutants. Include a description on how this activity was coordinated with the public education minimum measure and the pollution prevention/good housekeeping minimum measure programs. Identify person(s) / Department and/or parties responsible for the implementation of this requirement. Evaluate effectiveness of the implementation of this requirement.
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ILLICIT DISCHARGE DETECTION AND ELIMINATION cont'd

The DPW Employees did not have any specific training in 2010 related to illegal discharges or waste disposal. They have MSD sheets at the garage.

The Town Planner (who is also the Town's recycling coordinator) also informs employees on a case by case basis about proper recycling and disposal of hazardous materials, which includes informing employees of what is hazardous and what can be thrown in the trash, including awareness in 2010 on computers, rechargeable batteries, and fluorescent light bulbs. These were generally brief verbal encounters with individuals and during Department Head meetings. She also requested through the Town Administrator's office to have the Town Hall maintenance worker switch to non-toxic cleaners.

One business was targeted for stormwater education awareness. It was a plant/landscaping nursery redeveloping an existing site with previously disturbed wetlands on the property, which came to the Town for Development Plan Review. During the review process, the Town Planner sent the owner of the business information pertaining to Best Management Practices from EPA's website www.epa.gov/agriculture/nurgreen.html and from the Center for Watershed Protection Manual 8 excerpts from chapter 2, Basics of Storm Water Hotspots which included Nurseries and garden centers, and Profile Sheets from Chapter 5 for Reduced Fertilizer Use and Reduced Pesticide Use. The Town Planner also encouraged this business at that time to get involved in the Low Impact Development market (and again in 2011).

The efforts taken to inform the general public about the hazards with illegal discharges and improper disposal of waste include the efforts previously mentioned under sections IV.B.1.b.1 and IV.B.2.b.2.ii. Specifically, the '10 Simple Things' pamphlet includes a section on minimizing the use of hazardous products and information about how to find out how to properly dispose of hazardous products. One of the ways that this pamphlet gets distributed is in a 'Welcome Packet' that is sent to all new residents. The information posted on the Town's Stormwater webpage includes a copy of the Town's Illicit Discharge Ordinance, and an electronic version of the '[10 Simple Things](#)' Pamphlet with live links to all the resources mentioned in the pamphlet. The information booth at the Land Trust Earth Day Event includes: a poster board cluing the visual observer to learn that proper disposal of hazardous household waste helps keep waterbodies clean, and handouts on proper disposal of, and how to determine what is, hazardous waste ([EPA's Be Smart Poster](#), [EPA's Sure Your Home is Clean flyer](#), URI's Water Quality Protection factsheets: [Household Hazardous Products](#), and [What You Can Do About Nonpoint Source Pollution](#)). This booth also has another poster board about Composting and Recycling, which helps people understand how to properly dispose of wastes.

The Town Planner also maintains a separate webpage on '[Recycling and Composting](#)' which includes information about how to properly dispose of hazardous materials and e-waste, and gives links to the RI Resource Recovery Corporation's Eco-Depot, and Green Cleaning Recipes. The Stormwater Web Page and the Recycling Web page do not currently contain links to each other, but it would be a good idea to add some content to the Stormwater Webpage about the hazards of illegal discharges and improper disposal of wastes and link it to the recycling page.

I think a big help to this requirement would be to find ways to make it easier for people to actually dispose of household hazardous waste. In 2009, the Town hosted a satellite Eco-Depot at the Town Hall. Considering how popular it was, we should host another one sometime soon, and consider making it a yearly event. In September of 2010, we received PODS at our Transfer Station for collection of computers and tv's for recycling.

There were some other good suggestions in the 2009 report that we did not get to in 2010. The Flood really side-tracked us this year, but it presented some other opportunities. For instance, RIRRC did a great job at keeping the communities up-to-date, so that we could keep the residents and businesses up-to-date about how to dispose of their various flood damaged wastes. We posted this type of information on the website along with the other Flood resources we posted.

Additional Measurable Goals and Activities

SECTION II.A Other Reporting Requirements - Illicit Discharge Investigation and System Mapping (Part IV.G.2.m)

# of Illicit Discharges Identified in 2010: 0	# of Illicit Discharges Tracked in 2010: 0
# of Illicit Discharges Eliminated in 2010: n/a	# of Complaints Received: 0
# of Complaints Investigated: n/a	# of Violations Issued: n/a
# of Violations Resolved: n/a	# of Unresolved Violations Referred to RIDEM: n/a
Total # of Illicit Discharges Identified to Date: 0	Total # of Illicit Discharges remaining unresolved at the end of 2010: 0
Summary of Enforcement Actions:	
Extent to which the MS4 system has been mapped: mapped in Mishnock only	
Total # of Outfalls Identified and Mapped to Date: 5 (numbered 1, 3, 4, 5, and 6)	

SECTION II.B Interconnections (Part IV.G.2.k and IV.G.2.l)

Interconnection:	Date Found:	Location:	Name of Connectee:	Originating Source:	Planned and Coordinated Efforts and Activities with Connectee:
RIDOT discharges into West Greenwich, but their pipes do not connect to our pipes. In 2011, a DOT pipe will be connected to drainage in the private Centre of New England development, which was previously permitted through RIDEM.					



**MINIMUM CONTROL MEASURE #4:
CONSTRUCTION SITE STORM WATER RUNOFF CONTROL (Part IV.B.4 General Permit)**

SECTION I. OVERALL EVALUATION:

GENERAL SUMMARY, STATUS, APPROPRIATENESS AND EFFECTIVENESS OF MEASURABLE GOALS:

Include information relevant to the implementation of each measurable goal, such as activities implemented to support the review, issuance and tracking of permits, inspections and receipt of complaints. Discuss activities to be carried out during the next reporting cycle. If addressing TMDL requirements, please indicate rationale for the activities chosen to address the pollutant of concern.

(Note: Identify parties responsible for achieving the measurable goals and reference any reliance on another entity for achieving measurable goals.)

IV.B.4.b.1	Indicate if the Sediment and Erosion Control and Control of Other Wastes at Construction Sites ordinance was <u>not</u> developed, adopted and submitted to RIDEM, explain reasons why, submit proposed schedule for completion and identify person(s) / Department and/or parties responsible for the completion of this requirement.
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Date of Adoption:

If the Ordinance was amended in 2010 please indicate why changes were necessary.

Ordinance 79 Soil Erosion and Sediment Control was adopted on October 16, 2002. All construction sites (except for a single family house site) have to be reviewed by the Planning Board, in which case the [Land Development and Subdivision Regulations](#) must be followed. These regulations cover erosion and sediment control requirements (Article XIII Section H 4, page 82 and Article XIV Section B.page 103, and other wastes at construction sites Article XIV C 5. pg.104).

IV.B.4.b.6	Describe actions taken as a result of receipt and consideration of information submitted by the public.
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There was no information submitted by the public in 2010 regarding construction site runoff controls.

IV.B.4.b.8	Describe activities and actions taken as a result of referring to the State non-compliant construction site operators. The operator may rely on the Department for assistance in enforcing the provisions of the RIPDES General Permit for Storm Water Discharges Associated with Construction Activity to the MS4 if the operator of the construction site fails to comply with the local and State requirements of the permit and the non-compliance results or has the potential to result in significant adverse environmental impacts.
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There were no non-compliant sites referred to the State in 2010.

Additional Measurable Goals and Activities

CONSTRUCTION SITE STORM WATER RUNOFF CONTROL *cont'd*

SECTION II. A - Plan and SWPPP Reviews during Year 7 (2010) Part IV.B.4.b.2: Issuance of permits and/or implementation of policies and procedures for all construction projects resulting in land disturbance of greater than 1 acre.

IV.B.4.b.4: Review 100% of plans and SWPPPs for construction projects resulting in land disturbance of 1-5 acres must be conducted by adequately trained personnel and incorporate consideration of potential water quality impacts.

of Construction Reviews completed: 2

Summary of Reviews and Findings, include an evaluation of the effectiveness of the program. Identify person(s) /Department and/or parties responsible for the implementation of this requirement.

2 new Projects were reviewed in 2010: Big River Veterinary Service addition, and Hopkins Hill Nursery (a redevelopment of an existing house site). Both plans contained adequately proposed erosion controls. Plans were prepared by either a PE or a PLS, and both plans were reviewed by a consulting PE for the Town. The Town Planner is responsible for coordinating plan review.

SECTION II.B - Erosion and Sediment Control Inspections during Year 7 (2010) (Part IV.G.2.n) Part IV.B.4.b.7: Inspection of 100% of all construction projects within the regulated area that discharge or have the potential to discharge to the MS4 (the program must include two inspections of all construction sites, first inspection to be conducted during construction for compliance of the Erosion and Sediment controls at the site, the second to be conducted after the final stabilization of the site).

of Site Inspections: 1

of Complaints Received: 1

of Violations Issued: 0

of Unresolved Violations Referred to RIDEM: 0

Summary of Enforcement Actions, include an evaluation of the effectiveness of the program. Identify person(s) /Department and/or parties responsible for the implementation of this requirement.

The above mentioned nursery project included an area of previously disturbed wetland. RIDEM went out to the site and advised the applicant on what to do. Town Planner and Building Official went out and saw the installed erosion controls and the area was properly protected. There really wasn't a lot of construction at the site, just a hoop greenhouse (18 x 60) was put up and pea stone and dust control landscape fabric laid down to display the shrubs and trees on. The site slopes gently to the wetland and there is no connection to the MS4.

The vet expansion has not been constructed yet. (drainage will be contained on site and not connect to the MS4)

The one complaint about erosion and sedimentation that the Town received occurred while we were getting all the rain in March right before the Flood was declared a disaster. The property owner complained that the neighbor cleared an area of land and that it was resulting in excessive water and mud coming onto his property. The Town Planner, Building Official, and Town Administrator all went out to the site to investigate. It was discovered that the area that was cleared was for a new garden (previously a wooded area), and that silt fence was properly installed along the edge and that it was in good condition and working. When we investigated the complainant's property, we saw that there was no sediment, and no evidence of there having been any sediment entering his property, and no evidence of erosion occurring on his property due to runoff from the abutting site.



**MINIMUM CONTROL MEASURE #5:
POST CONSTRUCTION STORM WATER MANAGEMENT IN NEW DEVELOPMENT AND
REVELOPMENT
(Part IV.B.5 General Permit)**

SECTION I. OVERALL EVALUATION:

GENERAL SUMMARY, STATUS, APPROPRIATENESS AND EFFECTIVENESS OF MEASURABLE GOALS:

Include information relevant to the implementation of each measurable goal, such as activities implemented to support the review, issuance and tracking of permits, inspections and receipt of complaints, etc. Please indicate if any projects have incorporated the use of Low Impact Development techniques. Discuss activities to be carried out during the next reporting cycle. If addressing TMDL requirements, please indicate rationale for the activities chosen to address the pollutant of concern.

(Note: Identify parties responsible for achieving the measurable goals and reference any reliance on another entity for achieving measurable goals.)

IV.B.5.b.5	Describe activities and actions taken to coordinate with existing State programs requiring post-construction storm water management.
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There were no projects in 2010 that required coordinating with the State for post-construction stormwater management. The veterinarian addition project had on-site stormwater control, too far away from any wetlands for jurisdiction, and the limits of disturbance totaled less than one acre.

IV.B.5.b.6	Describe actions taken for the referral to RIDEM of new discharges of storm water associated with industrial activity as defined in RIPDES Rule 31(b)(15) (the operator must implement procedures to identify new activities that require permitting, notify RIDEM, and refer facilities with new storm water discharges associated with industrial activity to ensure that facilities will obtain the proper permits).
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There were no applications in 2010. N/A

IV.B.5.b.9	Indicate if the Post-Construction Runoff from New Development and Redevelopment Ordinance was <u>not</u> developed, adopted and submitted to RIDEM, explain reasons why, submit proposed schedule for completion and identify person(s) / Department and/or parties responsible for the completion of this requirement. Date of Adoption:
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The Town regulations on Post-Construction Runoff have been in place since at least 1993, and were amended in May 2008 to meet all of the remaining IV.B.5.b.9. requirements; however, they were finally submitted to RIDEM, along with the required letter from the Town Solicitor, in November of 2010.

IV.B.5.b.12	Describe activities and actions taken to identify existing storm water structural BMPs discharging to the MS4 with a goal of ensuring long term O&M of the BMPs.
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In 2009, all Town catch basins within the urban area (Mishnock) were catalogued. Associated swales and paved waterways were also mapped previously as shown on the Outfall Maps submitted with the 2008 Annual Report.

Additional Measurable Goals and Activities

SECTION II.A. - Plan and SWPPP Reviews during Year 7 (2010) Part IV.B.5.b.4: Review 100% of post-construction BMPs for the control of storm water runoff from new development and redevelopment projects that result in discharges to the MS4 which incorporates consideration of potential water quality impacts (the program requires reviewing 100% of plans for development projects greater than 1 acre, not reviewed by other State programs).

of Post-Construction Reviews completed: 2
<p>Summary of Reviews and Finding, include an evaluation of the effectiveness of the program. Identify person(s) /Department and/or parties responsible for the implementation of this requirement.</p> <p>Two projects were submitted and reviewed in 2010, but only one (the addition to the veterinarian service) needed post construction controls. These same projects are discussed under IV.B.4.b.4.</p>

SECTION II.B. - Post Construction Inspections during Year 7 (2010): Parts IV.G.2.o and IV.B.5.b.10 Proper Installation of Structural BMPs: Inspection of BMPs, to ensure these are constructed in accordance with the approved plans (the program must include inspection of 100% of all development greater than one acre within the regulated areas that result in discharges to the MS4 regardless of whom performs the review).

# of Site Inspections: 0	# of Complaints Received: 0
# of Violations Issued: 0	# of Unresolved Violations Referred to RIDEM: 0
<p>Summary of Enforcement Actions:</p> <p>There were no projects constructed in 2010 that had post-construction stormwater bmp infrastructure. (For historical purposes, it should be noted that the economy has been very slow these past few years.)</p>	

SECTION II.C. - Post Construction Inspections during Year 7 (2010): Parts IV.G.2.p and IV.B.5.b.11 Proper Operation and Maintenance of Structural BMPs (Part) Describe activities and actions taken to track required Operations and Maintenance (O&M) actions for site inspections and enforcement of the O&M of structural BMPs. Tracking of required O&M actions for site inspections and enforcement of the O&M of structural BMPs.

# of Site Inspections: 0	# of Complaints Received: 0
# of Violations Issued: 0	# of Unresolved Violations Referred to RIDEM: 0
<p>Summary of Activities and Enforcement Actions. Evaluate the effectiveness of the Program in minimizing water quality impacts. Identify person(s) /Department and/or parties responsible for the implementation of this requirement.</p> <p>To date, the Town has not been inspecting privately owned BMPs. For Town-owned infrastructure, the DPW inspects drainage infrastructure and cleans out sediment and/or makes repairs as needed. There is still no tracking system for this however.</p> <p>It will be a huge undertaking for municipalities to be responsible for inspecting private properties for compliance with O&M. There are no privately-owned stormwater facilities that are interconnected with the Town's facilities. With the new LID requirements, maintenance of privately owned stormwater infrastructure will be even more critical for water quality protection. Figuring out how to best run this type of program needs to be worked out with everyone's help- maybe something like the Environmental Results program would be appropriate. Self-evaluations and/or evidence of maintenance could be part of a required submittal for annual business license renewal (similar to proof of State taxes being paid for a liquor license renewal). Such an undertaking is akin to the required septic system inspections and pumping requirements (with evidence submitted to and tracked by the towns), as part of a Wastewater Management Plan/Ordinance. It should be noted that a Wastewater Management Program had been deemed too much of a burden to the Town of West Greenwich (we saw that other towns were needing to hire a new person just to run their program). It seems that keeping track of proof of O&M on private properties would be a similar burden. We would like to know how the other towns are handling this requirement and if there is any help and/or guidance that RIDEM can offer to help us meet this requirement.</p>	



**MINIMUM CONTROL MEASURE #6:
POLLUTION PREVENTION AND GOOD HOUSEKEEPING IN MUNICIPAL OPERATIONS
(Part IV.B.6 General Permit)**

SECTION I. OVERALL EVALUATION:

GENERAL SUMMARY, STATUS, APPROPRIATENESS AND EFFECTIVENESS OF MEASURABLE GOALS:

Include information relevant to the implementation of each measurable goal, such as activities and practices used to address on-going requirements, and personnel responsible. Discuss activities to be carried out during the next reporting cycle. If addressing TMDL requirements, please indicate rationale for the activities chosen to address the pollutant of concern.

(Note: Identify parties responsible for achieving the measurable goals and reference any reliance on another entity for achieving measurable goals.)

IV.B.6.b.1.i Describe activities and actions taken to identify structural BMPs owned or operated by the small MS4 operator (the program must include identification and listing of the specific location and a description of all structural BMPs in the SWMPP and update the information in the Annual Report). Evaluate appropriateness and effectiveness of this requirement.

In 2010, the Town Planner started making a list of the structural BMP's located within the urban area, based on the information from the tagging of the outfalls and catch basin map, and using the DPW's list of catch basins that they use for documenting catch basin cleaning. This has not been completed yet, and the RIDEM has sent the Town a Notice of Intent to Enforce non-compliance with the RIPDES permit for failure to submit this list. The Town Planner is responsible for this, with help from the Director of Public Works. We will try to complete this requirement in 2011.

IV.B.6.b.1.ii Describe activities and actions taken for inspections, cleaning and repair of detention/retention basins, storm sewers and catch basins with appropriate scheduling given intensity and type of use in the catchment area. Evaluate appropriateness and effectiveness of this requirement.

In 2010, the Dept. of Public Works hired a contractor to go out with one of the DPW guys to clean all the catch basins. The Director of Public Works has reported that all the catch basins in the entire Town were cleaned twice, and the ones in Mishnock were cleaned three times. Please see attached memo dated February 18, 2011 from the Director of Public Works to the Town Planner about this. Cleaning of detention/retention basins gets done as needed while the workers are out in the field. The response from our 2009 report is still applicable for 2010: During daily activities, cleaning and repairing of detention basins, catch basins, pipes, and swales occurs as needed by the Department of Public Works. On average each year, about 6 detention ponds need cleaning, refreshment of rip rap, repair of washouts, sediment removal, and/or loam and seeding. Inspections occur during daily activity to keep an eye on things while in the area, and as needed when a residents calls in with an issue. Visual inspections of catch basins also occur during street sweeping, not just during catch basin cleaning. Drainage infrastructure is monitored especially during rain events to ensure flow and is the best time, according to the Director of Public Works, to check if repairs or other maintenance are needed. The DPW just knows what areas need more frequent attention based on experience with the field activities above.

IV.B.6.b.1.iii Describe activities and actions taken to support the requirement of yearly inspection and cleaning of all catch basins (a lesser frequency of inspection based on at least two consecutive years of operational data indicating the system does not require annual cleaning might be acceptable). Evaluate appropriateness and effectiveness of this requirement.

The Town does this anyway. In 2010, the Dept. of Public Works hired a contractor to go out with one of the DPW guys to clean all the catch basins. The Director of Public Works has reported that all the catch basins in the entire Town were cleaned twice, and the ones in Mishnock were cleaned three times. They go down the road and check each catch basin as they go along, whether it needs cleaning or not. Please see attached memo dated February 18, 2011 from the Director of Public Works to the Town Planner about this.

IV.B.6.b.1.iv Describe activities and actions taken to minimize erosion of road shoulders and roadside ditches by requiring stabilization of those areas. Evaluate appropriateness and effectiveness of this requirement.

No new information for 2010. In order to minimize erosion of roadsides, the DPW makes sure that waterways are working properly. If needed, they add new waterways to lessen flow in problem areas, or install rip rap and/or loaming and seeding of area.

POLLUTION PREVENTION AND GOOD HOUSEKEEPING IN MUNICIPAL OPERATIONS cont'd

IV.B.6.b.1.v	Describe activities and actions taken to identify and report known discharges causing scouring at outfall pipes or outfalls with excessive sedimentation, for the Department to determine on a case-by-case basis if the scouring or sedimentation is a significant and continuous source of sediments. Evaluate appropriateness and effectiveness of this requirement.
During initial outfall mapping, and during the two 2009 dry-weather surveys, no scouring or excessive sedimentation were noticed at the outfalls in the urban area (Mishnock).	
IV.B.6.b.1.vi	Indicate if all streets and roads within the urbanized area were swept annually and if not indicate reason(s). Evaluate appropriateness and effectiveness of this requirement.
Please see attached memo dated February 18, 2011 from Dir. Public Works to Town Planner. In 2010, the roads in the urbanized area (Mishnock) were swept twice, and the main roads and all the plat roads were swept once. (The did not get to some of the other secondary roads in 2010).	
IV.B.6.b.1.vii	Describe activities and actions taken for controls to reduce floatables and other pollutants from the MS4. Evaluate appropriateness and effectiveness of this requirement.
No new information for 2010. Please see annual reports from previous years. In the past, the DPW added grates to certain catch basins that had open curb inlets. The biggest problem is with pine needles and leaves. The Earth Day clean-up event also helps prevent litter from entering the MS4 systems.	
IV.B.6.b.1.viii	Describe the method for disposal of waste removed from MS4s and waste from other municipal operations, including accumulated sediments, floatables and other debris and methods for record-keeping and tracking of this information.
No new information for 2010. Trash and recyclable materials are brought to the Town's transfer station. Waste oil from the garage is stored in an Igloo and a vendor comes to dispose of it. There is no formal record keeping yet.	
IV.B.6.b.4 and IV.B.6.b.5	Describe and indicate activities and corrective actions for the evaluation of compliance. This evaluation must include visual quarterly monitoring; routine visual inspections of designated equipment, processes, and material handling areas for evidence of, or the potential for, pollutants entering the drainage system or point source discharges to a waters of the State; and inspection of the entire facility at least once a year for evidence of pollution, evaluation of BMPs that have been implemented, and inspection of equipment. A Compliance Evaluation report summarizing the scope of the inspection, personnel making the inspection, major observations related to the implementation of the Storm Water Pollution Prevention Plan, and any actions taken to amend the Plan must be kept for record-keeping
Visual inspections of the DPW facilities occur almost daily, inside and out, but this is not recorded- it is just part of normal procedure. Once a week the Director of Public Works tours the facility giving full inspection, but no reports are made. The Town Planner has not yet made a spreadsheet for them to hang on the wall to make record keeping of this easier for the DPW. Insurance inspections of the facilities occur twice a year.	
IV.B.6.b.6	Describe all employee training programs used to prevent and reduce storm water pollution from activities such as park and open space maintenance, fleet and building maintenance, new construction and land disturbances, and storm water system maintenance for the past calendar year, including staff municipal participation in the URI NEMO storm water public education and outreach program and all in-house training conducted by municipality or other parties. Evaluate appropriateness and effectiveness of this requirement.
There were no formal employee training programs in 2010. The Town Planner was supposed to lead the DPW through the "Preventing Storm Water Pollution at Your Public Works Facility" module, but did not get to it. It would be a big help if URI or RIDEM (or SRICD) could come out and run these modules, especially if a few towns could get together at a time. The difficulty with scheduling trainings for DPW workers is if something happens like a snow storm or excessive rain. The Town Planner will try again to run this module for the DPW in 2011.	

POLLUTION PREVENTION AND GOOD HOUSEKEEPING IN MUNICIPAL OPERATIONS cont'd

IV.B.6.b.7	<p>Describe actions taken to ensure that new flow management projects undertaken by the operator are assessed for potential water quality impacts and existing projects are assessed for incorporation of additional water quality protection devices or practices. Evaluate appropriateness and effectiveness of this requirement.</p>
<p>No new information for 2010. Flow management projects are evaluated on a case by case basis to see if there is an opportunity to direct the flow, which may or may not provide for water quality. The priority is to reduce erosion while getting water off the road for safety purposes. Most flow projects in WG are diversion of existing flow, and not accommodation for new flow. In 2010, an addition was constructed on the library. The addition did not add any new parking spaces and did not increase runoff from the existing site that would be a detriment to water quality. The disturbance was less than one acre and the building is 1,700 square feet. It is surrounded by a wooded area.</p>	
<p>Additional Measurable Goals and Activities</p>	

SECTION III.A - Structural BMPs (Part IV.B.6.b.1.i)

BMP ID:	Location:	Name of BMP Owner/Operator:	Description of BMP:
Not listed yet			

SECTION II.B - Discharges Causing Scouring or Excessive Sedimentation (Part IV.B.6.b.1.v)

Outfall ID:	Location:	Description of Problem:	Description of Remediation Taken, include dates:	Receiving Water Body Name/Description:
none				

SECTION II.C - Note any planned municipal construction projects/opportunities to incorporate water quality BMPs, low impact development, or activities to promote infiltration and recharge (Part IV.G.2.j).

There are no new planned municipal construction projects .

SECTION II.D - Please include a summary of results of any other information that has been collected and analyzed. This includes any type of data (Part IV.G.2.e).

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TOTAL MAXIMUM DAILY LOAD (TMDL) or other Water Quality Determination REQUIREMENTS

SECTION I. If you have been notified that discharges from your MS4 require non-structural or structural storm water controls based on an approved TMDL or other water quality determination, please provide an assessment of the progress towards meeting the requirements for the control of storm water identified in the approved TMDL (Part IV.G.2.d). Please indicate rationale for the activities chosen to address the pollutant of concern.

There are no TMDL's established for West Greenwich water bodies.



SPECIAL RESOURCE PROTECTION WATERS (SRPWs)

SECTION I. In accordance with Rule 31(a)(5)(i)G of the *Regulations for the Rhode Island Pollutant Discharge Elimination System (RIPDES Regs)*, on or after March 10, 2008, any discharge from a small municipal separate storm sewer system to any Special Resource Protection Waters (SRPWs) or impaired water bodies within its jurisdiction must obtain permits if a waiver has not been granted in accordance to Rule 31(g)(5)(iii). A list of SRPWs can be found in Appendix D of the *RIDEM Water Quality Regulations* at this link:

<http://www.dem.ri.gov/pubs/regs/regs/water/h20q09a.pdf>

The 2008 303(d) Impaired Waters list can be found in Appendix G of the *2008 Integrated Water Quality Monitoring and Assessment Report* at this link: <http://www.dem.ri.gov/programs/benviron/water/quality/pdf/iwqmon08.pdf>

If you have discharges from your MS4 (regardless of its location) to any of the listed SRPWs or impaired waters (including impaired waters when a TMDL has not been approved), please provide an assessment of the progress towards expanding the MS4 Phase II Storm Water Program to include the discharges to the aforementioned waters and adapting the Six Minimum Control Measures to include the control of storm water in these areas. Please indicate a rationale for the activities chosen to protect these waters. Please note that all of the measurable goals and BMPs required by the 2003 MS4 General Permit may not be applicable to these discharges.

Waterbodies in West Greenwich on the SRPW list:

- Fisherville Brook headwaters starting from north of Henry Brown Road
- Tippencansett Pond
- Wickaboxet Pond

There are no known Town stormwater pipes discharging into these waterbodies.

Impaired waterbodies in West Greenwich listed in the 2008 303(d) report are the following:

- Eisenhower Lake- TMDL was approved in 2007 to address mercury (regional TMDL)
- Frenchtown Brook and tributaries- a TMDL is scheduled for 2016 to address fecal coliform
- Coney Brook and Tributaries- a TMDL is scheduled for 2016 to address copper

There are no known Town stormwater pipes discharging into these waterbodies. Cross-culverts are present where the road crosses the stream for continued flow.

Fisherville Brook (Henry Brown Road), Frenchtown Brook (Bates Trail), and Coney Brook (Muddy Brook Road) will be evaluated at the areas where the local roads cross these streams and could possibly contribute direct discharge to these waterbodies. The Town Planner was going to check on this along with the Director of Public Works in 2010 but did not get to it. We will try again in 2011. The Town will consult with RIDEM to determine if a permit is required or if a waiver is warranted. A discussion and findings to this effect will be incorporated into the revised SWMPP for the next General Permit cycle.

When I put the bread, hot the pan. The sandwich will soak it up random spread evenly over the bread.

- Use nonstick pans if possible, a s
- Cover the pan to ensure proper
- Flatten the sandwich slightly du
- properly and melt the cheese.
- Low, slow cooking is the way to
- Let it cool for five minutes. The

Marialisa Calta is the author of "Barba (Perigee, 2005). For more information,

CAMEMBERT A

4 tablespoons salted butter, at room temperature
1 small shallot, peeled and finely chopped
1 large clove garlic, peeled and minced
8 ounces white or brown mushrooms, sliced
2 teaspoons sherry vinegar or red wine vinegar
2 teaspoons finely chopped fresh herbs, such as dill, chives, or parsley
salt and freshly ground black pepper
1 baguette, cut crosswise into 4 (1/2-inch) thick slices
6 ounces Camembert, sliced 1/4-inch thick
8 ounces Comte, coarsely grated

Melt 2 tablespoons butter in a large skillet over medium heat. Add shallot and cook just until soft, about five minutes. Add mushrooms and cook until soft, about 10 minutes. Add garlic and cook until almost all of the butter has melted. Stir once or twice, and remove from heat. Wipe out the skillet with a paper towel.

Melt the remaining 2 tablespoons butter in a small saucepan over medium heat. Add the piece in half lengthwise. Pinch of salt. Cook until almost all of the butter has melted. Create a well. Place the baguette in the well. Turn the bottom of the baguette in the melted butter. Turn the bottom of the baguette on the bread, followed by the top, crust side up.

Reheat the skillet over medium heat. Add the bread and cook for five to six minutes. Turn the bread over and cook for five to six minutes. Press firmly with a spatula to compress the bread. Cook until the undersides are golden brown. Press firmly with the spatula to compress the bread. Cook until the undersides are completely melted. Remove from the heat.

Yield: 4 servings

Recipe from "Grilled Cheese, Pl

TOWN OF WEST GREENWICH PUBLIC NOTICE for DRAFT 2010 STORMWATER PROGRAM ANNUAL REPORT

PUBLIC COMMENT PERIOD: February 23, 2011 until 4 p.m. March 8, 2011

PUBLIC HEARING: Thursday, March 3, 2011 at 4:30 p.m. at Town Hall

The draft 2010 Phase II Stormwater Annual Report has been prepared in accordance with the Rhode Island Pollutant Discharge Elimination System (RIPDES) Program General Permit for Storm Water Discharges from Small Municipal Separate Storm Sewer Systems (MS4s) and from Industrial Activity at Eligible Facilities Operated by Regulated Small MS4s.

DATE OF THIS NOTICE: February 23, 2011

RIPDES PERMIT NUMBER: RIR040029

Name and Mailing Address of Small MS4 Operator: Town of West Greenwich
280 Victory Highway
WEST GREENWICH, RI 02817

Copies of the DRAFT Phase II Storm Water Annual Report may be obtained at no cost by visiting the Town's Stormwater webpage at:

http://www.wgtownri.org/departments/planning/storm_water.php

or by calling Jennifer Paquet, Town Planner at (401) 392-3800 x 121, or by visiting the Town Hall.

All records relating to this permit are available for review by the public. The administrative record containing all documents is on file and may be inspected, by appointment, at the Town Planner's office between 9:00 a.m. and 4:00 p.m., Monday through Friday, except holidays. Please visit the Town's Stormwater webpage for more information about the Stormwater Management Program.

A public hearing has been scheduled for Thursday, March 3, 2011, at 4:30 p.m. in the Town Council Chambers, Town of West Greenwich Town Hall, 280 Victory Highway, West Greenwich, RI 02817, to consider the Town of West Greenwich Phase II Storm Water Annual Report.

The Town of West Greenwich will provide interpreter services for the hearing impaired provided a request is received by the Town Clerk's office at 392-3800 three (3) business days prior to said hearing date.

Interested parties may submit written comments on the DRAFT Annual Report, amendments to the SWMPP, and the administrative record to the Town Planner by the close of the public comment period which ends 4:00 p.m., Tuesday, March 8, 2011. If, during the public comment period, significant comments are received concerning the DRAFT Annual Report or amendments to the SWMPP, the Town of West Greenwich will post a written response to comments on the Town's Stormwater webpage. The response will include the final 2010 Annual Report and identify what changes to the SWMPP have been made, if any.

Jennifer Paquet, Town Planner
Town of West Greenwich



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Jennifer Paquet, Town Planner
Town of West Greenwich

*Hard copy is on Town Planner's
door. Please see Town Clerk's
office if you need a copy*

West Greenwich Conservation Commission Earth Day Clean Up 2010





TEL: 401-392-3800
FAX: 401-392-3805



MAILING ADDRESS
280 VICTORY HIGHWAY
WEST GREENWICH
RHODE ISLAND 02817-2113

February 18, 2011

To: Jenny Paquet
Town Planner

From: Claude Wright
Director of Public Works

Re: Stormwater Annual Reporting for 2010

Due to the Flood last year, we had a lot of unexpected work to do with all the road damage, and our schedule was pushed back and cut short on time. As a result, we just didn't take the time to enter what we did into the computer excel sheets. Here is what we did accomplish, which I can attest to:

- Catch basin cleaning- we cleaned the catch basins in the whole Town two times, and in Mishnock three times. We hired Bruce Briggs, and Kenny from our department accompanied him. We started right after the floods because the cath basins were so full from so much washout. No unusual activity was observed in the catch basins other than how full they were.
- Street Sweeping- we cleaned all the roads in Mishnock 2 times and all the plats got done once. Bill did all the sweeping. All of the main roads were also done, but we didn't get to some of the secondary roads.
- We did not attend any trainings in 2010, but Beacon Insurance came out a few times to talk to us about safety and to inspect the DPW facility. We have MSD sheets for any chemicals and materials that we use.

A handwritten signature in blue ink, reading 'Claude Wright', is located at the bottom left of the page. The signature is stylized with a large 'C' and 'W'.