

# Year 4 Annual Report

## Massachusetts Small MS4 General Permit

### Reporting Period: July 1, 2021-June 30, 2022

**\*\*Please DO NOT attach any documents to this form. Instead, attach all requested documents to an email when submitting the form\*\***

*Unless otherwise noted, all fields are required to be filled out. If a field is left blank, it will be assumed the requirement or task has not been completed. Please ONLY report on activities between July 1, 2021 and June 30, 2022 unless otherwise requested.*

### Part I: Contact Information

Name of Municipality or Organization:

EPA NPDES Permit Number:

#### Primary MS4 Program Manager Contact Information

Name:

Title:

Street Address Line 1:

Street Address Line 2:

City:

State:

Zip Code:

Email:

Phone Number:

#### Stormwater Management Program (SWMP) Information

SWMP Location (web address):

Date SWMP was Last Updated:

If the SWMP is not available on the web please provide the physical address:

## Part II: Self-Assessment

First, in the box below, select the impairment(s) and/or TMDL(s) that are applicable to your MS4. Make sure you are referring to the most recent EPA approved Section 303(d) Impaired Waters List which can be found here: <https://www.epa.gov/tmdl/region-1-impaired-waters-and-303d-lists-state>

### Impairment(s)

- ☐ Bacteria/Pathogens      ☐ Chloride      ☐ Nitrogen      ☐ Phosphorus  
☐ Solids/ Oil/ Grease (Hydrocarbons)/ Metals

### TMDL(s)

- In State:**      ☐ Assabet River Phosphorus      ☐ Bacteria and Pathogen      ☐ Cape Cod Nitrogen  
☐ Charles River Watershed Phosphorus      ☒ Lake and Pond Phosphorus
- Out of State:**      ☐ Bacteria/Pathogens      ☐ Metals      ☒ Nitrogen      ☐ Phosphorus

Clear Impairments and TMDLs

Next, check off all requirements below that have been completed. **By checking each box you are certifying that you have completed that permit requirement fully.** If you have not completed a requirement leave the box unchecked. Additional information will be requested in later sections.

### Year 4 Requirements

- ☐ Developed a report assessing current street design and parking lot guidelines and other local requirements within the municipality that affect the creation of impervious cover, made it available as part of the SWMP, and:

☐ No updates were recommended

☒ Updates were recommended. The anticipated date or date of completion for updates is/was:

We're currently working with a consulting firm (Fuss & O'Neill) on this, and are expected to ha

- ☐ Developed a report assessing local regulations to determine the feasibility of making green infrastructure practices allowable when appropriate site conditions exist, made it available as part of the SWMP, and:

☐ No updates were recommended

☒ Updates were recommended. The anticipated date or date of completion for updates is/was:

We're currently working with a consulting firm (Fuss & O'Neill) on this, and are expected to ha

- ☒ Identified a minimum of 5 permittee-owned properties that could potentially be modified or retrofitted with BMPs to reduce impervious cover

*Optional:* If you would like to describe progress made on any incomplete requirements listed above, provide an update on previous incomplete milestones, or provide any additional details, please use the box below:

We're currently working with a consulting firm (Fuss & O'Neill) on this, and are expected to have it completed in the Fall/Winter 2022/23. Through the first phase of the Retrofit Plan recommendations were made, and at least 5 permittee-owned properties noted for potential modifications to be made. The report will

be added to the SWMP as soon as it is finalized.

### Annual Requirements

- ☒ Provided an opportunity for public participation in review and implementation of SWMP and complied with State Public Notice requirements
- ☒ Kept records relating to the permit available for 5 years and made available to the public
- ☒ The SSO inventory has been updated, including the status of mitigation and corrective measures implemented
  - ☒ This is not applicable because we do not have sanitary sewer
  - ☐ This is not applicable because we did not find any new SSOs
  - ☐ The updated SSO inventory is attached to the email submission
  - ☐ The updated SSO inventory can be found at the following website:
- ☒ Updated system map due in year 2 as necessary
- ☒ Provided training to employees involved in IDDE program within the reporting period
- ☒ Properly stored and disposed of catch basin cleanings and street sweepings so they did not discharge to receiving waters
- ☒ All curbed roadways were swept at least once within the reporting period
- ☒ Enclosed all road salt storage piles or facilities and implemented winter road maintenance procedures to minimize the use of road salt
- ☒ Implemented SWPPPs for all permittee owned or operated maintenance garages, public works yards, transfer stations, and other waste handling facilities
- ☒ Updated inventory of all permittee owned facilities as necessary
- ☒ O&M programs for all permittee owned facilities have been completed and updated as necessary
- ☒ Implemented all maintenance procedures for permittee owned facilities in accordance with O&M programs
- ☒ Implemented program for MS4 infrastructure maintenance to reduce the discharge of pollutants
- ☒ Inspected all permittee owned treatment structures (excluding catch basins)

*Optional:* If you would like to describe progress made on any incomplete requirements listed above or provide any additional details, please use the box below:

### **Nitrogen** (Combination of Impaired Waters Requirements and TMDL Requirements as Applicable)

#### Annual Requirements

##### *Public Education and Outreach\**

- ☒ Distributed an annual message in the spring (April/May) that encourages the proper use and disposal of grass clippings and encourages the proper use of slow-release fertilizers

- ☒ Distributed an annual message in the summer (June/July) encouraging the proper management of pet waste, including noting any existing ordinances where appropriate
  - ☒ Distributed an annual message in the fall (August/September/October) encouraging the proper disposal of leaf litter
- \* Public education messages can be combined with other public education requirements as applicable (see Appendix H and F for more information)*

#### *Good Housekeeping and Pollution Prevention for Permittee Owned Operations*

- ☒ Increased street sweeping frequency of all municipal owned streets and parking lots subject to Permit part 2.3.7.a.iii.(c) to a minimum of two times per year (spring and fall)

#### *Nitrogen Source Identification Report*

- ☐ Completed the Nitrogen Source Identification Report
  - ☐ The Nitrogen Source Identification Report is attached to the email submission
  - ☐ The Nitrogen Source Identification Report can be found at the following website:

We're currently working with Fuss and O'Neill to finalize the Nitrogen Source Identification Report.

#### *Potential structural BMPs*

- Any structural BMPs listed in Table 3 of Attachment 1 to Appendix H already existing or installed in the regulated area by the permittee or its agents was tracked and the nitrogen removal by the BMP was
- ☒ estimated consistent with Attachment 1 to Appendix H. The BMP type, total area treated by the BMP, the design storage volume of the BMP and the estimated nitrogen removed in mass per year by the BMP were documented.
    - ☐ The BMP information is attached to the email submission
    - ☐ The BMP information can be found at the following website:

*Optional:* If you would like to describe progress made on any incomplete requirements listed above or provide any additional details, please use the box below:

The permit does not require tracking of existing BMPs for municipalities subject to nitrogen TMDL requirements ( Appendix F, part B.I.1.c.iii). No new BMPs have been installed to date, but any such BMPs will be tracked as they are installed.

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#### **Lake and Pond Phosphorus TMDL**

- ☐ Defined the scope of the Lake Phosphorus Control Plan (LPCP). *Please select one of the following:*
  - ☐ The PCP scope is the entire area within our jurisdiction discharging to the impaired waterbody
  - ☐ The PCP scope is the urbanized area portion of our jurisdiction discharging to the impaired waterbody
- ☐ Calculated baseline phosphorus, allowable phosphorus load, and phosphorus reduction requirement

*Optional:* If you would like to describe progress made on any incomplete requirements listed above or provide any additional details, please use the box below:

We're currently in the process of finalizing the Lake and Phosphorus Control Plan. We're working with Fuss and O'Neill to get this completed.

*Optional:* Use the box below to provide any additional information you would like to share as part of your self-assessment:

### **Part III: Receiving Waters/Impaired Waters/TMDL**

Have you made any changes to your lists of receiving waters, outfalls, or impairments since the NOI was submitted?

☐ Yes

☒ No

If yes, describe below, including any relevant impairments or TMDLs:

## Part IV: Minimum Control Measures

Please fill out all of the metrics below. If applicable, include in the description who completed the task if completed by a third party.

### MCM1: Public Education

Number of educational messages completed **during this reporting period:**

Below, report on the educational messages completed **during this reporting period**. For the measurable goal(s) please describe the method/measures used to assess the overall effectiveness of the educational program.

#### **BMP: Clean Water Begins with You Let's Think Blue**

Message Description and Distribution Method:

Annual Census: Pollution threats due to dog waste, close trash barrels, construction prevent dirt runoff, businesses can stop oil, gas & grease runoff by using drip pan, etc.

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

2,000 flyers were mailed

Message Date(s):

Message Completed for: Appendix F Requirements ☒ Appendix H Requirements ☐

Was this message different than what was proposed in your NOI? Yes ☒ No ☐

If yes, describe why the change was made:

Town felt it was a good way to get the message out to the public

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#### **BMP: Be a Leaf Hero**

Message Description and Distribution Method:

Annual Census: Don't sweep into the streets, runoff causes pollution

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

2,000 flyers were mailed

Message Date(s): January 2022

Message Completed for: Appendix F Requirements ☒ Appendix H Requirements ☐

Was this message different than what was proposed in your NOI? Yes ☐ No ☐

If yes, describe why the change was made:

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**BMP:Think Blue Developers Sediment Control Press Release**

Message Description and Distribution Method:

Flyer is present on the town's website providing information on the importance of erosion control for construction sites.

Targeted Audience: Developers

Responsible Department/Parties: Conservation Commission

Measurable Goal(s):

visitors to the website

Message Date(s): rolling

Message Completed for: Appendix F Requirements ☐ Appendix H Requirements ☐

Was this message different than what was proposed in your NOI? Yes ☒ No ☐

If yes, describe why the change was made:

good way to introduce developers to stormwater

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**BMP:Gas, Oil and Grease...Oh My!**

Message Description and Distribution Method:

Town of Paxton web post outlining the correct handling of gas, oil and grease for spill prevention

Targeted Audience: Residents/Businesses

Responsible Department/Parties: Department of Public Works/Board of Health

Measurable Goal(s):

visitors to website

Message Date(s): rolling



Message Completed for: Appendix F Requirements ☐ Appendix H Requirements ☐

Was this message different than what was proposed in your NOI? Yes ☐ No ☐

If yes, describe why the change was made:

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**BMP: Think Blue Put Waste in its Place for Clean Water**

Message Description and Distribution Method:

Put waste in its place

Targeted Audience: Businesses

Responsible Department/Parties: BOH

Measurable Goal(s):

clean businesses

Message Date(s): rolling

Message Completed for: Appendix F Requirements ☒ Appendix H Requirements ☐

Was this message different than what was proposed in your NOI? Yes ☒ No ☐

If yes, describe why the change was made:

message to reach businesses

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**BMP: Think Blue Stop Erosion in its Tracks to Keep Our Water Clean**

Message Description and Distribution Method:

providing information regarding construction site runoff

Targeted Audience: Construction companies

Responsible Department/Parties: Department of Public Works/Building Inspector

Measurable Goal(s):

Visitors to website. Reduction in issues on construction sites.

Message Date(s): rolling

Message Completed for: Appendix F Requirements ☐ Appendix H Requirements ☐

Was this message different than what was proposed in your NOI? Yes ☐ No ☐

If yes, describe why the change was made:

Add an Educational Message

## MCM2: Public Participation

Describe the opportunity provided for public involvement in the development of the Stormwater Management Program (SWMP) **during this reporting period:**

The SWMP was posted on the town's website for public comment during this reporting period.

Was this opportunity different than what was proposed in your NOI? Yes ☐ No ☒

Describe any other public involvement or participation opportunities conducted **during this reporting period:**

The Town is a member of Wachusett Earthday, Inc., where hazardous collections were held this year.

The Town hosted a recycling day for appliances and other electronics at the DPW facility this year.

The Town's residents coordinated an Earth Day even where residents collected trash along road ways.

## MCM3: Illicit Discharge Detection and Elimination (IDDE)

### Sanitary Sewer Overflows (SSOs)

*Check off the box below if the statement is true.*

☒ This SSO section is NOT applicable because we DO NOT have sanitary sewer

*Below, report on the number of SSOs identified in the MS4 system and removed **during this reporting period.***

Number of SSOs identified:

Number of SSOs removed:

### MS4 System Mapping

*Optional:* Provide additional status information regarding your map:

### **Screening of Outfalls/Interconnections**

*If conducted, please submit any outfall monitoring results from this reporting period. Outfall monitoring results should include the date, outfall/interconnection identifier, location, weather conditions at time of sampling, precipitation in previous 48 hours, field screening parameter results, and results from all analyses. Please also include the updated inventory and ranking of outfalls/interconnections based on monitoring results.*

- ☒ No outfalls were inspected
- ☐ The outfall screening data is attached to the email submission
- ☐ The outfall screening data can be found at the following website:

*Below, report on the number of outfalls/interconnections screened **during this reporting period**.*

Number of outfalls screened:

*Below, report on the percent of outfalls/interconnections screened **to date**.*

Percent of outfalls screened:

*Optional:* Provide additional information regarding your outfall/interconnection screening:

### **Catchment Investigations**

*If conducted, please submit all data collected during this reporting period as part of the dry and wet weather investigations. Also include the presence or absence of System Vulnerability Factors for each catchment.*

- ☐ No catchment investigations were conducted
- ☒ The catchment investigation data is attached to the email submission
- ☐ The catchment investigation data can be found at the following website:

*Below, report on the number of catchment investigations completed **during this reporting period**.*

Number of catchment investigations completed this reporting period:

*Below, report on the percent of catchments investigated **to date**.*

Percent of total catchments investigated:

*Optional:* Provide any additional information for clarity regarding the catchment investigations below:

34 Catchments are considered fully completed (11 of these had key junction manholes that were also investigated, and determined did not require follow up. 23 of these are straight alignment (un-branching)

systems that have been verified, and confirmed to need no further investigation under the rules of the permit.

### **IDDE Progress**

*If illicit discharges were found, please submit a document describing work conducted over this reporting period, and cumulative to date, including location source; description of the discharge; method of discovery; date of discovery; and date of elimination, mitigation, or enforcement OR planned corrective measures and schedule of removal.*

- ☒ No illicit discharges were found
- ☐ The illicit discharge removal report is attached to the email submission
- ☐ The illicit discharge removal report can be found at the following website:

*Below, report on the number of illicit discharges identified and removed, along with the volume of sewage removed **during this reporting period.***

Number of illicit discharges identified:

Number of illicit discharges removed:

Estimated volume of sewage removed:  gallons/day

*Below, report on the total number of illicit discharges identified and removed to date. At a minimum, report on the number of illicit discharges identified and removed **since the effective date of the permit (July 1, 2018).***

Total number of illicit discharges identified:

Total number of illicit discharges removed:

*Optional:* Provide any additional information for clarity regarding illicit discharges identified, removed, or planned to be removed below:

### **Employee Training**

Describe the frequency and type of employee training conducted **during this reporting period:**

All staff participated in the Central Mass Storm Water Illicit Discharge Detection and Elimination training workshop on 3/24/22.

We also had several toolbox talks pertaining to storm water where we discussed the importance of catch basin cleanings and inspections, outfall inspections, and manhole inspections.

### **MCM4: Construction Site Stormwater Runoff Control**

*Below, report on the construction site plan reviews, inspections, and enforcement actions completed **during this reporting period.***

Number of site plan reviews completed:

Number of inspections completed: 1

Number of enforcement actions taken: 0

*Optional:* Enter any additional information relevant to construction site plan reviews, inspections, and enforcement actions:

We had one residential storm system that was installed and inspected on Davis Hill Road, and one plan review for a residential storm system that will be installed on South St.

## **MCM5: Post-Construction Stormwater Management in New Development and Redevelopment**

### **Ordinance or Regulatory Mechanism**

Date update was completed (due in year 3):

### **As-built Drawings**

*Below, report on the number of as-built drawings received **during this reporting period**.*

Number of as-built drawings received: 1

*Optional:* Enter any additional information relevant to the submission of as-built drawings:

Received the as-built drawings for 73 Davis Hill Road which are on file at the DPW facility located at 107 Holden Rd.

### **Retrofit Properties Inventory**

Below, list the permittee-owned properties that could be modified or retrofitted with BMPs to mitigate impervious areas (at least 5):

1. Paxton Center School
2. Senior Services Complex ( Paxton Senior Center, and Council on Aging)
3. Town offices/Town Hall
4. Ten West Market Parcel
5. Richards Memorial Library
6. Klingele Fields
7. Richards Ave. Right of Way

## MCM6: Good Housekeeping

### Catch Basin Cleaning

*Below, report on the number of catch basins inspected and cleaned, along with the total volume of material removed from the catch basins **during this reporting period**.*

Number of catch basins inspected:

Number of catch basins cleaned:

Total volume or mass of material removed from all catch basins:

*Below, report on the total number of catch basins in the MS4 system.*

Total number of catch basins:

*If applicable:*

Report on the actions taken if a catch basin sump is more than 50% full during two consecutive routine inspections/cleaning events:

### Street Sweeping

*Report on street sweeping completed **during this reporting period** using one of the three metrics below.*

☐ Number of miles cleaned:

☒ Volume of material removed:

☐ Weight of material removed:

### Stormwater Pollution Prevention Plan (SWPPP)

*Below, report on the number of site inspections for facilities that require a SWPPP completed **during this reporting period**.*

Number of site inspections completed:

Describe any corrective actions taken at a facility with a SWPPP:

We have not yet completed all of the SWPPPs, but are currently working towards getting them finalized.

## **Additional Information**

### **Monitoring or Study Results**

*Results from any other stormwater or receiving water quality monitoring or studies conducted during the reporting period not otherwise mentioned above, where the data is being used to inform permit compliance or permit effectiveness must be attached.*

- ☒ Not applicable
- ☐ The results from additional reports or studies are attached to the email submission
- ☐ The results from additional reports or studies can be found at the following website(s):

If such monitoring or studies were conducted on your behalf or if monitoring or studies conducted by other entities were reported to you, a brief description of the type of information gathered or received shall be described below:

### **Additional Information**

*Optional:* Enter any additional information relevant to your stormwater management program implementation during the reporting period. Include any BMP modifications made by the MS4 if not already discussed above:

### **COVID-19 Impacts**

*Optional:* If any of the above year 4 requirements could not be completed due to the impacts of COVID-19, please identify the requirement that could not be completed, any actions taken to attempt to complete the requirement, and reason the requirement could not be completed below:

### **Activities Planned for Next Reporting Period**

Please confirm that your SWMP has been, or will be, updated to comply with all applicable permit requirements including but not limited to the year 5 requirements summarized below. (Note: impaired waters and TMDL requirements are not listed below)

Yes, I agree ☒

Annual Requirements

- Annual report submitted and available to the public
- Annual opportunity for public participation in review and implementation of SWMP
- Keep records relating to the permit available for 5 years and make available to the public
- Properly store and dispose of catch basin cleanings and street sweepings so they do not discharge to receiving waters
- Annual training to employees involved in IDDE program
- Update inventory of all known locations where SSOs have discharged to the MS4
- Continue public education and outreach program
- Update outfall and interconnection inventory and priority ranking and include data collected in connection with the dry weather screening and other relevant inspections conducted
- Implement IDDE program
- Review site plans of construction sites as part of the construction stormwater runoff control program
- Conduct site inspection of construction sites as necessary
- Inspect and maintain stormwater treatment structures
- Log catch basins cleaned or inspected
- Sweep all curbed streets at least annually
- Continue investigations of catchments associated with Problem Outfalls
- Implemented SWPPPs for all permittee owned or operated maintenance garages, public works yards, transfer stations, and other waste handling facilities
- Review inventory of all permittee owned facilities in the categories of parks and open space, buildings and facilities, and vehicles and equipment; update if necessary
- Review O&M programs for all permittee owned facilities; update if necessary
- Implement all maintenance procedures for permittee owned facilities in accordance with O&M programs
- Implement program for MS4 infrastructure maintenance to reduce the discharge of pollutants
- Enclose all road salt storage piles or facilities and implemented winter road maintenance procedures to minimize the use of road salt
- Review as-built drawings for new and redevelopment to ensure compliance with post construction bylaws, regulations, or regulatory mechanism consistent with permit requirements
- Inspect all permittee owned treatment structures (excluding catch basins)
- Identify additional permittee-owned properties that could potentially be modified or retrofitted with BMPs to reduce impervious areas so that the permittee maintains a minimum of 5 sites in their inventory, until such a time when the permittee has less than 5 sites remaining

Provide any additional details on activities planned for permit year 5 below:



## Part V: Certification of Small MS4 Annual Report 2021

### 40 CFR 144.32(d) 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 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.

Name:

Travis Thibault

Title:

Director of Public Works

Signature:

Date:

*[Signatory may be a duly authorized  
representative]*

*Note: When prompted during signing, save the document under a new file name.*

### Annual Report Submission

*Please submit the form electronically via email to both EPA and MassDEP by clicking on one of the links below or using the email addresses listed below. Please ensure that all required attachments are included in the email and not attached to this PDF.*

EPA: [stormwater.reports@epa.gov](mailto:stormwater.reports@epa.gov)MassDEP: [Stormwater.DEP@mass.gov](mailto:Stormwater.DEP@mass.gov)

### Paper Signature:

*If you did not sign electronically above, you can print the signature page by clicking the button below.*

[Print Signature Page](#)

*Optional: If you did not sign electronically above, you may lock the form by clicking the "Lock Form" button below which will prompt you to save the locked version of the form. Save this locked version under a new file name.*

[Lock Form](#)