

Year 3 Annual Report

Massachusetts Small MS4 General Permit

Reporting Period: July 1, 2020-June 30, 2021

****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, 2020 and June 30, 2021 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 3 Requirements

- ☒ Inspected and screened all outfalls/interconnections (excluding Problem and Excluded outfalls)
☒ Updated outfall/interconnection priority ranking based on the information collected during the dry weather inspections as necessary
☐ Post-construction bylaw, ordinance, or other regulatory mechanism was updated and adopted consistent with permit requirements

Optional: If you would like to describe progress made on any incomplete requirements listed above, provide any additional information, and/or if any of the above year 3 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:

We at the Paxton DPW are still in the process of finalizing the Post-construction bylaw. All of the outfalls and interconnections have been inspected, but the dry weather sampling has not yet been completed.

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:

- ☒ Properly stored and disposed of catch basin cleanings and street sweepings so they did not discharge to receiving waters
- ☒ Provided training to employees involved in IDDE program within the reporting period
- ☒ All curbed roadways were swept at least once within the reporting period
- ☒ Updated system map due in year 2 as necessary
- ☒ 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, provide any additional information, and/or if any of the above annual 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:

We have not yet completed the SWPPPs for all permittee owned facilities therefore we have not yet implemented those practices. In October of 2020 the previous DPW Superintendent retired, and the new Director is still in the process of bringing Paxton up to date on all necessary requirements. The SWPPPs will be a priority to get completed, and put into practice by the new Director.

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)

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 structural BMPs have been installed to date, but any such BMPs will be tracked as they are installed.

Lake and Pond Phosphorus TMDL

- ☐ Completed the funding source assessment

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:

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

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 2021

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:

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

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: DPW Operations/BOH

Measurable Goal(s):

Visits 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:

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

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

Message Description and Distribution Method:

Providing information regarding construction site run off

Targeted Audience: Construction companies

Responsible Department/Parties: DPW Operations/Building Inspector

Measurable Goal(s):

Visits to web page. 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 event 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:

There are a total of 120 outfalls/interconnections throughout the entire town's storm water system. 87.5% of all outfalls/interconnections have been inspected. There are 15 outfalls/interconnections throughout town that haven't been inspected to date. Any outfalls throughout town that had flow during the dry weather inspection have yet to be sampled.

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:

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:**

An annual training was done in November of 2020 which took place in the field. Fuss and O'Neill trained all employees on outfall inspections and proper sampling techniques.

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:

Number of enforcement actions taken:

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

There was one large home built at #73 Davis Hill Road. Due to the size of the home, a Cultec Recharger Chamber system was required. The initial plans were approved, and inspections were done once the system was in place. Upon final inspection it was signed off by the Engineer of Record, and As-built plans of the system were turned in.

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

As-built Drawings

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

Number of as-built drawings received:

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

As-built plans are on file at the DPW facility for #73 Davis Hill Road Cultec recharge system that was installed.

Street Design and Parking Lots Report

Describe the status of the street design and parking lots assessment due in year 4 of the permit term, including any planned or completed changes to local regulations and guidelines:

The street design and parking lot assessments that are due in year 4 of the permit term have yet to be finalized. No other changes have been made at this time to Paxton's regulations or guidelines.

Green Infrastructure Report

Describe the status of the green infrastructure report due in year 4 of the permit term, including the findings and progress towards making the practice allowable:

Paxton has been working with Fuss & O'Neil on all things related to the MS4 permit, and all regulated storm water requirements. As part of the retrofit suggestions that Fuss a& O'Neill has made, there are several ideas of Green Infrastructure improvements.

Retrofit Properties Inventory

Describe the status of the inventory, due in year 4 of the permit term, of permittee-owned properties that could be modified or retrofitted with BMPs to mitigate impervious areas and report on any properties that have been modified or retrofitted:

All inventory has been reviewed and documented.

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:

In this reporting period we did not have any basins that were more than 50% full during two consecutive routine cleanings. The basins that we did find that were more than 50% full had not been cleaned in several years. We plan to do a 2nd round of cleaning of all basins within the MS4 permitted area this fall in order to determine the frequency at which each structure will need to be cleaned.

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:

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 3 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:

We have not yet completed the SWPPPs for all permittee owned facilities therefore we have not yet implemented those practices. In October of 2020 the previous DPW superintendent retired, and the new Director is still in the process of bring Paxton up to date on all necessary requirements.

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 4 requirements summarized below. (Note: impaired waters and TMDL requirements are not listed below)

Yes, I agree ☒

- Develop a report assessing current street design and parking lot guidelines and other local requirements within the municipality that affect the creation of impervious cover
- Develop a report assessing existing local regulations to determine the feasibility of making green infrastructure practices allowable when appropriate site conditions exist
- Identify a minimum of 5 permittee-owned properties that could potentially be modified or retrofitted with BMPs to reduce impervious areas

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)

Provide any additional details on activities planned for permit year 4 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.govMassDEP: laura.schifman@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](#)