

**Municipality/Organization:** Town of Sudbury MA  
**EPA NPDES Permit Number:** MAR04-1224  
**MassDEP Transmittal Number:** W-  
**Annual Report Number  
& Reporting Period:** April 1, 2012 – March 31, 2013

**NPDES PII Small MS4 General Permit  
Annual Report  
(Due: May 1, 2013)**

**Part I. General Information**

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Certification:

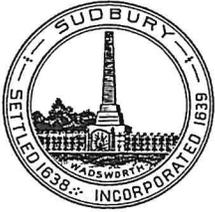
I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, 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.

Signature: 

Printed Name: Maureen G. Valente

Title: Town Manager

Date: April 30, 2013



Maureen G. Valente  
Town Manager

## TOWN OF SUBBURY

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April 30, 2013

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Re: NPDES DEP & EPA Permit #MAR041224  
Year 10 Report

Dear DEP and EPA:

In accordance with our 2003 NPDES permit, please accept this document as our tenth annual report required under our MS4 Phase II Storm water Permit covering April 1, 2012 to March 31, 2013. The purpose of the annual report is to document the status of Storm Water Management Program (SWMP) implementation through a self-assessment review of compliance with the permit conditions; an assessment of the appropriateness of the selected BMPs; an assessment of the progress towards achieving the measurable goals; a summary of results of any information that has been collected and analyzed; a discussion of activities for the next reporting cycle; a discussion of any changes in identified BMPs or measurable goals; and reference to any reliance on another entity for achieving any measurable goal.

The Town of Sudbury continues our comprehensive efforts to protect our water quality through appropriate use of storm water best management practices, controlling erosion, public education, illicit discharge detection and elimination, water quality monitoring of stormwater discharges, encouragement of low impact development; and green infrastructure techniques.

We continue to plan for the new permit requirements and are investigating the possibility of combining several town positions into a Stormwater Coordinator position. We recognize that public education will play a large role in the ability obtain funding for both the current and future permit requirements.

### **Assessment of Compliance with Permit**

A total of sixteen permits were issued and monitored under the Stormwater Management Bylaw for the Year 10 reporting period.

To assist in the review and permitting of a SWMP, Sudbury has contracted with Eggleston Environmental of Sudbury MA for review of the individual stormwater permit applications. This third-party review is funded by the applicant in accordance with the SWMP bylaw and regulations.

The DPW continues to maintain and update the stormwater database of structures and locations. As a result of this tracking and monitoring, the stormwater management system is compliant with our EPA MS4 Phase II permit.

### **Appropriateness of Selected BMPs**

Sudbury continues to find that our chosen BMPs for newer construction are appropriate and effective for improving the quality of our stormwater runoff. We continue to review our drainage inventory to determine the priority areas where upgrades to BMPs will result in improvement of runoff quality.

The Conservation Commission continues to participate with OARS3 River, Mass Fish & Wildlife, and Trout Unlimited as part of a comprehensive program to identify all the Cold Water Fisheries streams in Town. During Year 10, nine new cold water fisheries resources were identified and confirmed by Mass Fish & Wildlife. When prioritizing drainage structures for repair, redesign, or new construction, those structures discharging into a cold water fisheries resource are part of the criteria used to identify the drainage most in need of improvement.

In Year 10, the Conservation Commission staff worked with Trout Unlimited to educate other towns in the area on the existence of cold water fisheries and the need to protect this important resource.

### **PROGRESS TOWARDS ACHIEVING MEASURABLE GOALS**

Year 10 Measurable Goals:

During Year 10, Sudbury met and exceeded its requirement for maintenance of its roadway drainage system. New or redeveloped walkways were designed to improve drainage. Where applicable, berms were installed to channel runoff to the BMPs; drainage structures were raised or lowered to provide the correct gradient for flow into the BMP; and grading of the walkway surface was pitched for proper drainage and scoured and eroded areas were stabilized. Specifically,

- 288 lane-miles of public roadways were swept. This represents the entire Town and is accomplished one time each year.
- Over 1,500 tons of sand/debris was collected and stockpiled for beneficial use.
- Over 30% of the catch basins were cleaned.
- The culverts and associated drainage structures at the Town's DPW facility were inspected and cleaned on a quarterly basis.
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- Floor drains in the DPW garage were inspected.
- The degreaser in the DPW wash bay was maintained.
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- The "country" drainage structures (ditches) along three major roads were excavated to their original capacity.

- A brush disposal area was set up for public use at the Town gravel pit help prevent roadside dumping of brush after several major storms during Year 10.
- Six new leach pits were installed.
- New berms were installed in 14 locations.
- The Sudbury Engineering Dept. designed new drainage systems in three locations.
- Eight walkways were engineered, constructed, or repaired.
- Ten new or repaired/redesigned drainage systems were completed.
- Forty-four total catch basins, outfalls, or manholes were repaired.

The Town continues to systematically replace old corrugated metal drainage pipes with reinforced concrete pipes. Low impact development techniques continue to be encouraged.

The Town continues to identify and mark the actual outfall locations of some of the most historic drainage systems in Town (pre 1950). Year 10 included completing the identification and documentation of the drainage in the historic section of Concord Road. Plans are underway to improve the outfall of this system on the south side of Route 20.

#### **Public Education and Outreach:**

Sudbury contracted for the public education and outreach component for Year 10 with SuAsCo Watershed Council.

We continue to expose citizens to the need to improve runoff quality and to educate them as to how they can change their habits to work toward this goal. This is accomplished through newspaper articles, articles posted on the website, and with the SuAsCo materials.

Through our Stormwater Management Bylaw, we are able to review small projects and use this permitting requirement as an opportunity to inform and educate the property owner on the need to manage and treat runoff. The larger projects are now reviewed by our Stormwater consultant.

#### **Public Participation and Involvement**

Sudbury contracted for the public education and outreach component for Year 10 with SuAsCo Watershed Council.

The Ponds & Waterways Committee (PWC) continues their awareness campaign through the installation of lawn signs indicating lawns that were eco-friendly to protect the Town waterways. The PWC and the Hop Brook Protection Association (HBPA, a private citizen organization) continues to monitor the Marlborough Easterly Wastewater Treatment Plan to ensure they abide by their permit limitations for the discharge of nitrogen and phosphorous to the downstream ponds and waterways in Sudbury. The HBPA has contracted with Beals & Thomas, Inc. to begin the design and permitting of the dredging of Carding Mill Pond. The HBPA is working closely with the Conservation Commission as this project design evolves and the permitting parameters are better understood.

The Sudbury Board of Health provides household hazardous waste collection through the Hartwell Avenue Compost Facility in Lexington MA. Residents have the opportunity to participate in seven Household Hazardous Waste Days in Lexington by pre-registering with the Sudbury Board of Health. This opportunity is advertised on the Town website, in the local newspaper, and in flyers throughout Town.

The Town of Sudbury continues to participate in the East Middlesex Mosquito Control Project. The Project services include mosquito and wetland surveillance, larval and adult mosquito control, ditch maintenance, and public education

### **Illicit Discharge Detection and Elimination**

Illicit Discharge and Detection procedures have been established and will be reviewed and revised as necessary to comply with pending requirements of the new EPA MS4 permit. Funding for the purchase of 2 portable Chem-Metrics field test kits was approved in early 2011. This funding remained available in Year 10. Preliminary prioritization and identification of outfalls for testing was completed in Year 9. Testing priorities continued to be refined in Year 10 as DPW crews become more aware of the need to look beyond the catch basin and report any unusual odors, sheen, turbidity, etc. During Year 10, the DPW cleaned 323 catch basins, representing over 30% percent of total basins in Town.

The continuation of the comprehensive program for outfall testing is pending EPA's release of the new permit to be sure the appropriate parameters are being tested.

The Reporting and Complaint phone line in the DPW did not receive any reports of suspicious odors or substances in catch basins or waterways during the past year.

### **Pollution Prevention/Good Housekeeping**

The planning for the redesign of the roadway system and major drainage upgrades in the Town Center has been completed. At the 2013 Annual Town meeting, residents will vote on funding the final engineering design, contract document preparation, and the construction of the improvements. The purchase by the Town of the property at 15 Hudson Road was completed in Year 10, and the parcel will be used to create a stormwater detention pond to capture and treat runoff from the majority of the new Town Center roadway system. The detention basin has been identified as the appropriate BMPs for use in this area due to grading, contours, and soil types.

(See Progress toward Measurable Goals for additional activities.)

### **Construction Site and Post-Construction Runoff Control**

Sudbury's Stormwater Management Bylaw and regulations have been in effect since 2009 and staff has had an opportunity to see what works and what might need modification. During Year 10, some minor adjustments to the Stormwater Management Bylaw was approved at Town Meeting to make it easier to administer while not compromising the purpose of the Bylaw. The changes involve slightly increasing thresholds without compromising environmental quality to allow for focus and follow-up and larger projects.

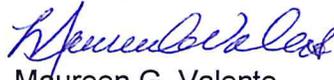
During Year 10, the Conservation Commission staff has developed a database of projects under construction and has created a routine follow-up inspection schedule to monitor the erosion control effectiveness on larger or more vulnerable sites. Sites with steep slopes and/or resource areas that could be at risk if erosion control measures fail are required to hire an Environmental Monitor who reports weekly and after large storm events, to the Conservation Commission.

### Activities for Next Reporting Cycle

- Prepare for implementation of the new EPA Phase II MS4 permit requirements
- Continued sampling of catch basins as prioritized by the DPW, Conservation Commission and Board of Health
- Continued operation and maintenance of drainage structures in accordance with the increasing database schedule
- Continue investigating the formation of a storm water utility
- Earth Removal Bylaw to be drafted by Planning Board for presentation to Town Meeting
- Work closely with the Ponds & Waterways Committee to identify areas where joint water quality goals can be achieved
- The Planning Board continues to work on new regulations for Water Resource Protection District Bylaw during 2013
- Consider annual permit and fee for discharge to MS4
- As funding permits, contract with SuAsCo to provide the Public Participation/Public Involvement and the Public Education/Outreach components for Year 11 reporting cycle.
- Maintain or increase the visibility of the "Stormwater Matters" message and continue to encourage public education and involvement concerning the need to report any illegal discharges or release of illegal substances into the Town's stormwater system

We once again appreciate this opportunity to provide a status report on Sudbury's progress toward our Storm water Management Goals.

Sincerely,



Maureen G. Valente  
Town Manager