

Year 1 Annual Report
Massachusetts Small MS4 General Permit
Reporting Period: May 1, 2018-June 30, 2019

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.

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:

Fax 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 and an explanation of why it is not posted on the web:

Part II: Self Assessment

First, in the box below, select the impairment(s) and/or TMDL(s) that are applicable to your MS4.

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 1 Requirements

- Develop and begin public education and outreach program
- Identify and develop inventory of all known locations where SSOs have discharged to the MS4 in the last 5 years
 - The SSO inventory is attached to the email submission
 - The SSO inventory can be found at the following website:
- Develop written IDDE plan including a procedure for screening and sampling outfalls
- IDDE ordinance complete
- Identify each outfall and interconnection discharging from MS4, classify into the relevant category, and priority rank each catchment for investigation
 - The priority ranking of outfalls/interconnections is attached to the email submission
 - The priority ranking of outfalls/interconnections can be found at the following website:

<http://clintonma.gov/261/Road-Department - Appendix C of IDDE Plan>
- Construction/ Erosion and Sediment Control (ESC) ordinance complete
- Develop written procedures for site inspections and enforcement of sediment and erosion control measures
- Develop written procedures for site plan review
- Keep a log of catch basins cleaned or inspected
- Complete inspection of all stormwater treatment structures

Annual Requirements

- Annual opportunity for public participation in review and implementation of SWMP
- Comply with State Public Notice requirements
- 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
- All curbed roadways have been swept a minimum of one time per year

Bacteria/ Pathogens (Combination of Impaired Waters Requirements and TMDL Requirements as Applicable)

Annual Requirements

*Public Education and Outreach**

- Annual message encouraging the proper management of pet waste, including noting any existing ordinances where appropriate
- Permittee or its agents disseminate educational material to dog owners at the time of issuance or renewal of dog license, or other appropriate time
- Provide information to owners of septic systems about proper maintenance in any catchment that discharges to a water body impaired for bacteria

** Public education messages can be combined with other public education requirements as applicable (see Appendix H and F for more information)*

Phosphorus (Combination of Impaired Waters Requirements and TMDL Requirements as Applicable)

Annual Requirements

*Public Education and Outreach**

- Distribute 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 and phosphorus-free fertilizers
- Distribute an annual message in the summer (June/July) encouraging the proper management of pet waste, including noting any existing ordinances where appropriate
- Distribute 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

- Increase 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 Attachment 3 to Appendix F already existing or installed in the regulated area by the permittee or its agents shall be tracked and the permittee shall estimate the phosphorus removal by the BMP consistent with Attachment 1 to Appendix H. Document the BMP type, total area treated by the BMP, the design storage volume of the BMP and the estimated phosphorus removed in mass per year by the BMP in each annual report
-

Use the box below to input additional details on any unchecked boxes above or any additional information you would like to share as part of your self assessment:

Public Education - During Year 1, Clinton developed an education program and began implementing it. It will be fully implemented in Year 2, including messages pertaining to lawn and leaf care.

SSO Inventory - The Town cannot locate its SSO file and has contacted MassDEP to obtain copies of SSO notifications.

Catch Basin Cleaning Log - A catch basin cleaning tracking log was developed under the Plan for Optimizing Catch Basin Cleaning developed during Year 1 and will be used beginning in Year 2.

IDDE Training - An employee IDDE Training program will be developed during Year 2, with annual training to be performed starting in Year 2. Training will correspond with the start of outfall inspection activities.

Increased Street Sweeping - The Town routinely sweeps all streets in Town a minimum of once a year after snowmelt. Some streets are swept 3x per year and the central business district is swept monthly. The Town prepared a street sweeping plan as part of its SWMP based on the location of impaired waters within Town. Increased sweeping in impaired watersheds will begin in Year 2. A minimum of twice a year will occur in the Nashua River watershed due to a phosphorus impairment.

Potential Structural BMPs - Existing BMPs have been identified. These will be reviewed further for potential phosphorus removal amounts where applicable.

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 the reporting period:

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

BMP: Pet Waste Mailing

Message Description and Distribution Method:

The "Do Your "Doody" for Clean Water" fact sheet prepared by ThinkBlue Massachusetts was mailed to all Clinton residents and businesses.

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

Mailing sent to all residents in Town.

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:

BMP: Pet Waste Management with Dog Licenses

Message Description and Distribution Method:

The one page "By Laws for Dog Owners for the Town of Clinton" was distributed to dog owners when they renewed their dog's licenses. The by laws outline the requires for removing excrement left by dogs and fines for failure to do so. The by laws are also posted on the Town's website with information on dog licenses.

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

By laws distributed to all dog owners during license renewal.

Message Date(s): May 2019

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: School Curricula - Watershed Protection and Pollution Prevention

Message Description and Distribution Method:

Stormwater education is incorporated into the school curricula and covers topics including watershed protection and pollution prevention, stormwater management, stream protection, and impacts on water quality. Clinton Elementary School 3rd grade has a field trip to Wachusett Meadow that revolves around conservation and Env. Eng. introduction. The 5th grade takes a field trip to the Nashua River for an environmental lesson that includes a canoe trip and sediment sampling to learn about the ecosystem and the effects of pollution. The Middle school sixth grade class takes a weeklong field day to Natures Classroom and learns about conservation, wildlife and stream and Pond ecosystems. The High School is preparing to offer AP Environmental Science as a permanent elective starting next year. The Health Department also takes "Nature Walks" along the Wachusett Reservoir.

Targeted Audience: Residents

Responsible Department/Parties: Schools, DPW

Measurable Goal(s):

Continued education to various grade levels.

Message Date(s): October 2018 - Natures classroom and Nashua River canoe trip for middle schoolers; May 2018 and 2019 - Nashua River canoe trip for 3rd graders

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: Surface and Groundwater Pollution Prevention

Message Description and Distribution Method:

Clinton continuously displays fact sheets/brochures on surface and groundwater pollution at Town Hall.

Targeted Audience: Residents

Responsible Department/Parties: DPW

Measurable Goal(s):

Display materials at Town Hall

Message Date(s): Continuous display.

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: Construction Impacts Poster and Flyers

Message Description and Distribution Method:

Clinton continuously displays a poster outlining the impacts of construction on stormwater runoff at Town Hall. Flyers are also available outlining information on erosion control, LID and the CGP Permit.

Targeted Audience: Developers (construction)

Responsible Department/Parties: DPW

Measurable Goal(s):

Display poster and materials at Town Hall.

Message Date(s): Continuous display.

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: Septic System Maintenance Mailing

Message Description and Distribution Method:

A letter was mailed in March to all property owners informing them that they are required to maintain their septic systems. The Town also displays posters in the Town Hall regarding septic system maintenance.

Targeted Audience: Residents

Responsible Department/Parties: DPW

Measurable Goal(s):

Direct mailing to all property owners.

Message Date(s): March 2019

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 the reporting period:

SWMP Plan for Download - The Town has posted the SWMP Plan on Town website along with contact information to allow for public comment.

The Town continues to allow yard waste drop off at Town facility.

DPW employees doe clean ups periodically throughout the year. There is an organized Town-wide cleanup day each April. The Seventh Day Adventist (SDA) Church holds an annual cleanup day in April that includes the area around the Nashua River. A group of residents organize a cleanup around the South Meadow Pond area also in April.

Clinton is a member Town for the Devens Regional Household Hazardous Products Collection Center. The center is open to member Towns the first Wednesday and Saturday of the month from March to December.

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

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

An Eagle Scout candidate stenciled catch basins during the reporting period.

MCM3: Illicit Discharge Detection and Elimination (IDDE)

Sanitary Sewer Overflows (SSOs)

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:

Below, report on the total number of SSOs identified in the MS4 system and removed to date. At a minimum, report SSOs identified since 2013.

Total number of SSOs identified:

Total number of SSOs removed:

MS4 System Mapping

Describe the status of your MS4 map, including any progress made during the reporting period (phase I map due in year 2):

Phase I map is complete. The Town has mapped all known outfalls and receiving waters including impairments, open channel conveyances, interconnections with other MS4s, municipally owned structural BMPs, initial outfall catchment delineations, manholes and catch basins. Mapping of pipe connectivity has also been performed. All data is included in the Town's GIS database.

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.

- 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 total outfalls/ interconnections screened to date.

Percent of total outfalls screened:

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.

- The catchment investigation data is attached to the email submission

- The catchment investigation data can be found at the following website:

N/A - none completed to date

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

Number of catchment investigations completed this reporting period: 0

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

Percent of total catchments investigated: 0

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

N/A - not started yet

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.

- The illicit discharge removal report is attached to the email submission
- The illicit discharge removal report can be found at the following website:

N/A - no illicit discharges found

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: 0

Number of illicit discharges removed: 0

Estimated volume of sewage removed: N/A [UNITS]

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.

Total number of illicit discharges identified: 0

Total number of illicit discharges removed: 0

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

N/A

Employee Training

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

An employee IDDE Training program will be developed during Year 2, with annual training to be performed starting in Year 2 to correspond with the start of IDDE investigation work.

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:

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

Ordinance Development

Describe the status of the post-construction ordinance required to be complete in year 2 of the permit term:

Clinton has an existing Stormwater Bylaw that will be updated in Year 2 to comply with the requirements of the MS4 Permit.

As-built Drawings

Describe the status of the measures the MS4 has utilized to require the submission of as-built drawings and ensure long term operation and maintenance of completed construction sites required to be complete in year 2 of the permit term:

The Town's Stormwater Bylaw requires the submission of certified (by a registered PE) as-built record drawings of all structural stormwater controls and treatment best management practices required for the site at the completion of a construction project. The Town also requires submission of an O&M Plan with maintenance agreements to ensure long-term maintenance throughout the life of the stormwater system. These requirements will be reviewed and modified as needed with year 2 updates.

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:

No work completed in Year 1. To be completed in future years.

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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:

No work completed in Year 1. To be completed in future years.

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:

No work completed in Year 1. To be completed in future years, upon completion of an inventory of City-owned property.

MCM6: Good Housekeeping

Catch Basin Cleaning

Describe the status of the catch basin cleaning optimization plan:

A plan for optimizing catch basin cleaning was completed and included as Appendix H to the SWMP. The Plan

If complete, attach the catch basin cleaning optimization plan or the schedule to gather information to develop the optimization plan:

- The catch basin cleaning optimization plan or schedule is attached to the email submission
- The catch basin cleaning optimization plan or schedule can be found at the following website:

<http://clintonma.gov/261/Road-Department - Appendix H of SWMP Plan>

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, if known.

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:

Not yet applicable, pending collection of sediment data from catch basins in accordance with the Plan for Optimizing Catch Basin Cleaning.

Street Sweeping

Describe the status of the written procedures for sweeping streets and municipal-owned lots:

The Town developed a street sweeping map showing sweeping requirements throughout Town based on the location of impaired waters. A street sweeping SOP was also developed and will be included as part of a larger comprehensive Operation and Maintenance (O&M) Plan during Year 2 that covers other facilities and stormwater infrastructure.

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

Number of miles cleaned:

Volume of material removed: [UNITS]

Weight of material removed:

If applicable:

For rural uncurbed roadways with no catch basins, describe the progress of the inspection, documentation, and targeted sweeping plan:

DPW personnel observe all regulated town-owned roadways for maintenance needs, including street sweeping, during routine operations. Personnel also observe suspect trouble areas, such as large-scale construction projects or projects with substantial land disturbance, for evidence of runoff-laden sediment onto roadways that may require more frequent sweeping in addition to that outlined under the Street Sweeping SOP. Should areas in need of additional sweeping be observed, the Town will document these areas and schedule additional sweeping as needed. Inspections of rural uncurbed roadways conducted to date have not yet observed any needs for additional sweeping within regulated urbanized area roadways.

Winter Road Maintenance

Describe the status of the written procedures for winter road maintenance including the storage of salt and sand:

The Town developed an SOP for winter road maintenance during Year 1. The SOP will be included as part of a larger comprehensive Operation and Maintenance (O&M) Plan during Year 2 that covers other facilities and stormwater infrastructure.

Inventory of Permittee-Owned Properties

Describe the status of the inventory, due in year 2 of the permit term, of permittee-owned properties, including parks and open spaces, buildings and facilities, and vehicles and equipment, and include any updates:

No work completed in Year 1. The Town will develop an inventory by the end of Year 2.

O&M Procedures for Parks and Open Spaces, Buildings and Facilities, and Vehicles and Equipment

Describe the status of the operation and maintenance procedures, due in year 2 of the permit term, of permittee-owned properties (parks and open spaces, buildings and facilities, vehicles and equipment) and include maintenance activities associated with each:

No work completed in Year 1. To be completed in Year 2.

Stormwater Pollution Prevention Plan (SWPPP)

Describe the status of any SWPPP, due in year 2 of the permit term, for permittee-owned or operated facilities including maintenance garages, public works yards, transfer stations, and other waste handling facilities where pollutants are exposed to stormwater:

A draft SWPPP has been prepared for the Town of Clinton Department of Public Works Garage and Recycling Center. This will be updated in Year 2 to incorporate any changes at the facility since the plan was drafted.

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:

N/A

O&M Procedures for Stormwater Treatment Structures

Describe the status of the written procedure for stormwater treatment structure maintenance:

The Town has written procedures, including inspection forms and maintenance logs, for Town-owned stormwater treatment structures. Town-owned BMPs were inspected in June 2019.

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:

N/A

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:

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

Yes, I agree

- Complete system mapping Phase I
- Begin investigations of catchments associated with Problem Outfalls
- Develop or modify an ordinance or other regulatory mechanism for post-construction stormwater runoff from new development and redevelopment
- Establish and implement written procedures to require the submission of as-built drawings no later than two years after the completion of construction projects
- Develop, if not already developed, written operations and maintenance procedures
- Develop an inventory of all permittee owned facilities in the categories of parks and open space,

- buildings and facilities, and vehicles and equipment; review annually and update as necessary
- Establish a written program detailing the activities and procedures the permittee will implement so that the MS4 infrastructure is maintained in a timely manner
- Develop and implement a written SWPPP for maintenance garages, public works yards, transfer stations, and other waste handling facilities where pollutants are exposed to stormwater
- Enclose or cover storage piles of salt or piles containing salt used for deicing or other purposes
- Develop, if not already developed, written procedures for sweeping streets and municipal-owned lots
- Develop, if not already developed, written procedures for winter road maintenance including storage of salt and sand
- Develop, if not already developed, a schedule for catch basin cleaning
- Develop, if not already developed, a written procedure for stormwater treatment structure maintenance
- Develop a written catchment investigation procedure (*18 months*)

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 in the last 5 years
- 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 uncurbed streets at least annually

Provide any additional details on activities planned for permit year 2 below:

Part V: Certification of Small MS4 Annual Report 2019

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:

Michael J. Ward

Title:

Town Administrator

Signature:



Date:

9-30-19

[Signatory may be a duly authorized representative]