

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: Town of Hudson

EPA NPDES Permit Number: MAR041198

Primary MS4 Program Manager Contact Information

Name: Eric Ryder

Title: Director of Public Works

Street Address Line 1: 1 Municipal Drive

Street Address Line 2: na

City: Hudson

State: MA

Zip Code: 01749

Email: erylryder@townofhudson.org

Phone Number: (978) 562-9333

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Stormwater Management Program (SWMP) Information

SWMP Location (web address): https://www.townofhudson.org/sites/hudsonma/files/uploads/2018.09.10_swmp.pdf

Date SWMP was Last Updated: Sep 10, 2018

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:☒ 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

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

Lake and Pond Phosphorus TMDL

- ☐ Begin Phase 1 Lake Phosphorus Control Plan (LPCP)

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:

The Town of Hudson has developed a strategy for implementation of its basic and targeted education requirements and anticipates initiating the program in Permit Year 2.

Consistent with permit requirement 2.3.7.a, the Town of Hudson intends to refine procedures for catchbasin cleaning and sweeping streets and municipally-owned lots in Permit Year 2.

Consistent with permit requirement 2.3.4.5, the Town of Hudson will update its MS4 map to include municipally-owned and operated stormwater treatment structures. We anticipate all stormwater treatment structures will be mapped consistent with 2.3.4.5 by the end of Permit Year 2. Additionally, an inspection

program will be developed in Permit Year 2 consistent with permit requirement 2.3.7.a.

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: To be Delivered in Permit Year 2

Message Description and Distribution Method:

In Permit Year 2:

Education and outreach notices will be distributed to four target audiences: residents, commercial, construction, and industrial and will include discussion of phosphorus and bacterial/pathogens issues (Hudson's receiving water impairments). Outreach to the four target audiences will be distributed through the Consumer Confidence Report. Erosion and Sediment Control brochures will be provided on an ongoing basis to water, sewer, and drainage contractors that must be licensed with the Town. The Health Department will provide septic outreach via brochures and the Town Clerk's Office will provide brochures during dog licensing.

The phosphorus and bacterial/pathogens notices will be distributed seasonally as noted below:

Annual Notices:

By the end of Permit Year (PY) 2, a minimum of one educational message will be directed to each of the four target audiences (residents, commercial, construction, industrial) and a minimum of one additional educational message by the end of PY 5. These messages will be posted on the Town website, in the Consumer Confidence Report, and continued throughout the Permit term. In addition, the Town must provide annual educational materials to owners of septic systems for areas that discharge into bacteria/pathogen impaired water bodies about proper maintenance.

Seasonal Notices:

For areas that discharge to bacteria/pathogen or phosphorus impaired water bodies, the Town will provide educational outreach according to the timeline below and via internet postings:

- March & April: For areas that discharge to waterbodies with a Total Phosphorus impairment, distribute one educational message to proper disposal of grass clippings and fertilizer use.
- June & July: For areas that discharge to waterbodies with a Total Phosphorus and/or Bacteria impairment, distribute one educational message that pertains to proper pet waste management (also covered in continuous dog licensing outreach).
- August, September, & October: For areas that discharge to waterbodies with a Total Phosphorus impairment, distribute one educational message that pertains to proper disposal of leaf litter.

Targeted Audience:

Responsible Department/Parties: Multiple

Measurable Goal(s):

Message Date(s): To be delivered in Year 2

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:

The Town of Hudson had their SWMP available for review and comment at the Department of Public Works and posted on their website.

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:

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:

The Town of Hudson's MS4 map is updated annually. We anticipate the Town's MS4 map will be updated by the end of Permit Year 2 with all requirements consistent with permit section 2.3.4.5. This includes: outfalls, receiving waters, open channel conveyances, interconnections with other MS4s and other storm sewer systems, municipally-owned stormwater treatment structures, waterbodies, and initial catchment delineations.

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:

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: 0

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

To be conducted in future permit years.

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:

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: 0 [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:

To be conducted in future permit years.

Employee Training

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

To be conducted in future permit years.

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: 10

Number of inspections completed: 7

Number of enforcement actions taken: 2

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:

To be developed in future permit years.

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:

As-built drawings are currently required under the Town of Hudson's Regulations Regarding the Subdivision of Land.

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:

To be conducted in future permit years.

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:

To be developed in future permit 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:

To be developed in future permit years.

MCM6: Good Housekeeping

Catch Basin Cleaning

Describe the status of the catch basin cleaning optimization plan:

Consistent with permit requirement 2.3.7.a, the Town of Hudson intends to develop catch basin cleaning optim

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:

To be developed in Permit Year 2.

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: 2350

Number of catch basins cleaned: 2350

Total volume or mass of material removed from all catch basins: 443 CY

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

Total number of catch basins: ~3400

If applicable:

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

Catch basin is cleaned. Optimization plan to be developed in Permit Year 2.

Street Sweeping

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

Consistent with permit requirement 2.3.7.a, the Town of Hudson intends to develop written procedures for sweeping streets and municipally-owned lots in Permit Year 2.

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

☒ Number of miles cleaned: 93.8

☐ Volume of material removed: [] [UNITS]

☐ Weight of material removed: [] [UNITS]

If applicable:

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

Consistent with permit requirement 2.3.7.a, the Town of Hudson intends to develop written procedures for sweeping streets and municipally-owned lots in Permit Year 2.

Winter Road Maintenance

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

Consistent with permit requirement 2.3.7.a, the Town of Hudson intends to develop written procedures for winter road maintenance in Permit Year 2.

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:

Consistent with permit requirement 2.3.7.a, the Town of Hudson intends to develop an inventory of permittee-owned properties such as parks and open spaces, buildings and facilities, and vehicles and equipment in Permit 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:

Consistent with permit requirement 2.3.7.a, the Town of Hudson intends to develop an inventory of permittee-owned properties such as parks and open spaces, buildings and facilities, and vehicles and equipment in Permit 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:

Consistent with permit requirement 2.3.7.b, the Town of Hudson intends to develop SWPPPs for permittee-owned or operated facilities such as maintenance garages, public works yard, transfer stations, and other waste handling facilities.

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:

O&M Procedures for Stormwater Treatment Structures

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

Consistent with permit requirement 2.3.7.a, the Town of Hudson intends to develop written operation and maintenance procedures for stormwater treatment structures in Permit Year 2.

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:

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.

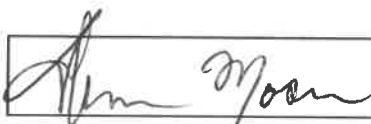
Name:

Thomas Moses

Title:

Executive Assistant

Signature:



Date:

9/25/2019

[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:

MassDEP:

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](#)