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 Organi	zation: Tow	n of Sudbu	ıry	
EPA N	NPDES Permit N	Number: M	AR041224			
Prima	ry MS4 Progra	m Manag	er Contac	t Informat	ion	
Name:	Dan Nason				Title:	Director of Public Works
Street	Address Line 1:	275 Old I	Lancaster R	Load		
Street	Address Line 2:	na				
City:	Sudbury		S	tate: MA	Zip Co	ode: 01776
Email:	nasond@sudbu	ıry.ma.us			Phon	ne Number: (978) 440-5421
Fax N	umber: na					
Storm	water Manager	ment Prog	ram (SWI	MP) Inforn	nation	
SWMI	P Location (web	address):	https://sud	bury.ma.us	/pcd/201	8-09-13_sudbury_swmp/
Date S	WMP was Last	Updated:	Sep 13, 20	18		
	SWMP is not av		the web pl	ease provid	le the ph	ysical address and an explanation of why it is

Part II: Self Assessment

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

Impairment(<u>(s)</u>			
	☒ Bacteria/Pathogens☒ Solids/ Oil/ Grease (Hy	☐ Chloride ydrocarbons)/ Meta	☐ Nitrogen	
TMDL(s)				
In State:	☐ Assabet River Phospho☐ Charles River Watersh		eria and Pathogen ☐ Lake and Pond	☐ Cape Cod Nitrogen Phosphorus
Out of State:	☐ Bacteria/Pathogens	☐ Metals	☐ Nitrogen	☐ Phosphorus
			Cl	ear Impairments and TMDLs
you have com	ipleted that permit require dditional information will b	nent fully. If you ho	ave not completed a re	ch box you are certifying that equirement leave the box
	op and begin public education	on and outreach pro	oram	
	ry and develop inventory of	•	0	scharged to the MS4 in the
	The SSO inventory is aThe SSO inventory can			
	Not applicable - See c	omments below.		
⊠ Develo	op written IDDE plan includ	ling a procedure for	screening and sample	ing outfalls
⊠ IDDE	ordinance complete			
	ry each outfall and intercons y rank each catchment for in		from MS4, classify in	nto the relevant category, and
	• The priority ranking o	f outfalls/interconne	ections is attached to t	he email submission
	C The priority ranking of	f outfalls/interconne	ections can be found a	t the following website:
	ruction/ Erosion and Sedime		_	
Develo measur	op written procedures for sit res	te inspections and e	nforcement of sedime	nt and erosion control
⊠ Develo	op written procedures for si	te plan review		
-	a log of catch basins cleaned	•		
☐ Compl	lete inspection of all stormy	vater treatment struc	etures	

Town of Sudbury Page 3
□ 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
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 (se 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 (se 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 each annual report

Town of Sudbury Page 4 Good Housekeeping and Pollution Prevention for Permittee Owned Operations Increase street sweeping frequency of all municipal owned streets and parking lots to a schedule to target areas with potential for high pollutant loads Prioritize inspection and maintenance for catch basins to ensure that no sump shall be more than 50 percent full; Clean catch basins more frequently if inspection and maintenance activities indicate excessive sediment or debris loadings 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 Sudbury does not have a sanitary sewer system, therefore SSOs are not applicable to this community. A notice to owners of septic systems is prepared, and will be distributed during the month of September, 2019. Notices to dog owners were not distributed during issuance of licenses, but separate outreach was conducted as outlined in MCM 1 BMP 1 below. Consistent with permit requirement 2.3.7.a.iii.2, the Town of Sudbury is working toward optimization and thorough documentation of its catch basin cleaning program through the use of tablet-based GIS inputs during catch basin cleaning. It is anticipated that documentation and program development will be completed in Permit Year 2 for targeted catchbasin cleaning and street sweeping. Consistent with permit requirement 2.3.4.5, Town of Sudbury is currently undertaking updates to its MS4 map to comprehensively 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. Once

all municipally owned and operated treatment structures have been identified and mapped, the City can move forward calculating the phosphorus removed with each BMP. 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

submitted?	was
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.

completed by a third party.
MCM1: Public Education
Number of educational messages completed during the reporting period: 5
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:Seasonal posting for fertilizer, pet waste, septic maintenance and fall leaf litter Message Description and Distribution Method:
Think Blue Massachusetts, on behalf of the Minuteman Advisory Group on Interlocal Coordination, ran a regional education advertising campaign targeting communities in the coalition, including Sudbury. The campaign consisted of an educational video advertisement helping viewers visualize how pollution from pet waste, motor oil and trash become stormwater pollution. This advertisement was run from June 23 to July 12, 2019 on Facebook, Instagram and YouTube, and was targeted to coalition residents through account information and IP addresses.
Think Blue Massachusetts "Fowl Water" video (https://www.thinkbluemassachusetts.org/)
Targeted Audience: Residents
Responsible Department/Parties: Public Works
Measurable Goal(s):
Per the Notice of Intent, the measurable goal for this BMP was to deliver these messages seasonally and annually by posting to the Web. Because this advertisement campaign was run online, this measurable goal has been met for the topic of pet waste. Message effectiveness was assessed with a survey conducted at the close of the advertising campaign of Massachusetts residents in the areas where the campaign ran: 15.25% of survey respondents recalled seeing the video (up from 8% in FY2018) Those who recalled seeing the video were more likely to correctly answer that stormwater pollution ends up in local waterways (comparable to FY2018) Those who recalled seeing the video rated polluted runoff as a more serious threat to waterways than
those who didn't recall seeing the video (Comparable to FY2018)
Message Date(s): June 23, 2019 - June 30, 2019
Message Completed for: Appendix F Requirements ☐ Appendix H Requirements ☒ Was this message different than what was proposed in your NOI? Yes ☒ No ☐

The Town of Sudbury partners with Think Blue Massachusetts and the Minuteman Advisory Group on Interlocal Coordination and developed this partnership after the initial NOI filing. This message was considered to meet the Town's goal to distribute information on the impacts of pet waste on water quality. The Town Warrant/Tax Bill inserts as described in the NOI will be considered for use in Permit Year 2.

If yes, describe why the change was made:

BMP:Seasonal posting for fertilizer, pet waste, septic maintenance and fall leaf litter
Message Description and Distribution Method:
On May 1, 2019, the Town of Sudbury posted an educational image to Town's Facebook page about the impacts of lawn fertilizers on waterways, with a link to the Town of Sudbury website and a Lawn Fertilizer Infosheet. The infosheet described the impacts of stormwater pollution, the potential of excessive lawn fertilizer use to cause algae blooms and fishkills, and what homeowners can do to prevent this.
Through the Town of Sudbury Health Department webpage there is the link for the DEP website Septic Maintenance. This information is available year round and will be supplemented by brochures developed and to be distributed in Permit Year 2.
On November 6, 2018, the Town of Sudbury posted an educational article on the Town website describing the impacts of leaves and yard waste on the Town drainage system, and what homeowners can do to prevent them. A link to the article was also posted to the Town's Facebook page.
Targeted Audience: Residents
Responsible Department/Parties: Public Works
Measurable Goal(s):
Per the Notice of Intent, the measurable goal for this BMP was to deliver these messages seasonally and annually by posting to the Web. This measurable goal has been met for messages targeted at residents on the topics of fertilizer use and leaf litter. The Town's Facebook page has 1,793 followers, Facebook users who actively choose to have the Town's posts appear in their newsfeed.
Message Date(s): The infosheets remain available on the Town website and Facebook page year round.
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:
Per the Town's SWMP, additional educational messages to each of the 4 target audiences will be distributed in PY 2 and PY 5.
BMP:Rain Barrel Sale Message Description and Distribution Method:
On May 4, 2019, the Town of Sudbury partnered with the Great American Rain Barrel Company to provide residents the opportunity to purchase rain barrels to capture rainwater for lawn and garden use, while providing educational information about how capturing roof runoff helps reduce stormwater runoff and conserve water.
Targeted Audience: Residents
Responsible Department/Parties: Planning/zoning Department
Measurable Goal(s):

This outreach activity was in addition to the BMPs described in the Notice of Intent, and had no established

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: This addition to the educational program was an opportunity that arose after the filing of the NOI. The Town of Sudbury will continue to employ opportunistic education and outreach opportunities. BMP:[Message name here] Message Description and Distribution Method: Targeted Audience: Message Date(s): 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:[Message name here] Message Description and Distribution Method:	Fown of Sudbury	Page 8
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: This addition to the educational program was an opportunity that arose after the filing of the NOI. The Town of Sudbury will continue to employ opportunistic education and outreach opportunities. **BMP: [Message name here]** Message Description and Distribution Method: Message Description and Distribution Method: Message Date(s): Message Date(s): Message Completed for: Appendix F Requirements Appendix H Requirements Appendix H Requirements If yes, describe why the change was made: Message Date(s): Message Dat	measurable goal. This event served to expand general educational opportunities regarding	ng stormwater.
Was this message different than what was proposed in your NOI? Yes ⋈ No ☐ If yes, describe why the change was made: This addition to the educational program was an opportunity that arose after the filing of the NOI. The Town of Sudbury will continue to employ opportunistic education and outreach opportunities. BMP:[Message name here] Message Description and Distribution Method: Targeted Audience: Responsible Department/Parties: 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:[Message name here] Message Description and Distribution Method: Targeted Audience: Responsible Department/Parties:	Message Date(s): May 4, 2019	
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of Sudbury will continue to employ opportunistic education and outreach opportunities. BMP: Message name here	If yes, describe why the change was made:	
Message Description and Distribution Method: Targeted Audience: Responsible Department/Parties: Measurable Goal(s): Message Date(s): Message Completed for: Appendix F Requirements		
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If yes, describe why the change was made: BMP: [Message name here] Message Description and Distribution Method: Targeted Audience: Responsible Department/Parties:	Message Completed for: Appendix F Requirements Appendix H Requirements	S 🗌
BMP:[Message name here] Message Description and Distribution Method: Targeted Audience: Responsible Department/Parties:	Was this message different than what was proposed in your NOI? Yes ⊠ No □	
Message Description and Distribution Method: Targeted Audience: Responsible Department/Parties:	If yes, describe why the change was made:	
Targeted Audience: Responsible Department/Parties:	BMP: [Message name here] Message Description and Distribution Method:	
Responsible Department/Parties:		
	Targeted Audience:	
Measurable Goal(s):	Responsible Department/Parties:	
	Measurable Goal(s):	

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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:	
Add an Educational Message	
MCM2: Public Participation	
Describe the opportunity provided for public involvement in the development of the Stormwater Managerogram (SWMP) during the reporting period:	gement
At the June 25, 2019 Board of Selectmen's Meeting, DPW Director Dan Nason and stormwater manage consultant Woodard & Curran presented an overview of the MS4 General Permit and the Town's 5-year SWMP.	
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 pe	
On May 4, 2019, the Town of Sudbury partnered with the Great American Rain Barrel Company to provide residents the opportunity to purchase rain barrels to capture rainwater for lawn and garden use, while providing educational information about how capturing roof runoff helps reduce stormwater runoff and conserve water.	
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: N/A

Number of SSOs removed: N/A

Page 10 Town of Sudbury 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: N/A Total number of SSOs removed: N/A **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): The Town of Sudbury MS4 Map is annually updated. During this reporting period, the Town received training on editing structures within GIS and are currently in the process of updating and refining the 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. O The outfall screening data is attached to the email submission O 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: 0 Below, report on the percent of total outfalls/interconnections screened to date. Percent of total outfalls screened: 0 **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. O The catchment investigation data is attached to the email submission O 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: 0 Below, report on the percent of catchments investigated to date.

Percent of total catchments investigated: 0

If illicit discharges were found, please submit a document despection, and cumulative to date, including location source; desidate of discovery; and date of elimination, mitigation, or enforcedule of removal. The illicit discharge removal report is attacted. The illicit discharge removal report can be selow, report on the number of illicit discharges identified and removed during this reporting period. Number of illicit discharges identified: 0 Number of illicit discharges removed: N/A Below, report on the total number of illicit discharges identified the number of illicit discharges identified and removed since to the number of illicit discharges identified: Total number of illicit discharges identified:	escription of the discharge; method of discovery; orcement OR planned corrective measures and ched to the email submission found at the following website:
The illicit discharge removal report is attact. The illicit discharge removal report can be selow, report on the number of illicit discharges identified and removed during this reporting period. Number of illicit discharges identified: Number of illicit discharges removed: Estimated volume of sewage removed: N/A Below, report on the total number of illicit discharges identified the number of illicit discharges identified and removed since in the number of illicit discharges identified and removed since in the number of illicit discharges identified and removed since in the number of illicit discharges identified and removed since in the number of illicit discharges identified and removed since in the number of illicit discharges identified and removed since in the number of illicit discharges identified and removed since in the number of illicit discharges identified and removed since in the number of illicit discharges identified and removed since in the number of illicit discharges identified and removed since in the number of illicit discharges identified and removed since in the number of illicit discharges identified and removed since in the number of illicit discharges identified and removed since in the number of illicit discharges identified and removed since in the number of illicit discharges identified and removed since in the number of illicit discharges identified and removed since in the number of illicit discharges identified and removed since in the number of illicit discharges identified and removed since in the number of illicit discharges identified and removed since in the number of illicit discharges identified and removed illicit discharges identified and removed illicit discharges ill	found at the following website:
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Estimated volume of sewage removed: N/A Below, report on the total number of illicit discharges identifithe number of illicit discharges identified and removed since	
Below, report on the total number of illicit discharges identifi the number of illicit discharges identified and removed since	
the number of illicit discharges identified and removed since	[UNITS]
Total number of illicit discharges identified.	<u>*</u>
1 5 that it shifted of infinite disconding to identified.	0
Total number of illicit discharges removed:	0
Optional: Provide any additional information for clarity regardanced to be removed below:	arding illicit discharges identified, removed, or
Employee Training	
Describe the frequency and type of employee training conduc	cted during the reporting period:

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MCM4: Construction Site Stormwater Runoff Control

well as detailed instruction on outfall and manhole inspection and catchment investigation procedures. The

Town of Sudbury anticipates initiation of its outfall inspection program in Permit Year 2.

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

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Number of site plan reviews comp	leted: 13
Number of inspections completed:	12
Number of enforcement actions tal	xen: 0

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:

Consistent with BMP 4.2 - Develop written construction site stormwater runoff control program procedures and BMP 5.1- Develop written post-construction stormwater runoff program procedures in the Town of Sudbury's SWMP, the Town has developed a Land Development Program Manual in Permit Year 1. The purpose is to describe the written procedures associated with managing stormwater runoff from new development and redevelopment construction sites in accordance with the MS4 Permit. The Manual provides general construction site inspection guidance for all projects required to obtain a federal Construction General Permit and the local Stormwater Management Permit, provides guidance to Town of Sudbury staff required to implement the Land Development Program, and can be used as a training tool for staff.

Review of the Town's Stormwater Control Ordinance/Bylaw, regulations and wetland protection and local permit application process to ensure that site development applicants meet Post-Construction General Permit Obligations, as well as evaluation of the effectiveness of the Town Stormwater Control Bylaw relating to permit section 2.3.6.iii requirements, is taking place concurrent with the development of the Land Development Program Manual.

Based on the outcome of the Land Development Program Manual development and review of Town stormwater control bylaws, ordinances and regulations, the Town will update local bylaw or regulations as necessary in Permit Year 2.

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 current	ly required	in Town o	f Sudbury's	Stormwater	Management 1	Bylaw a	nd Regulat	ions.

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:

Ί	o	be con	ducted	in	future	permit	years.
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Green Infrastructure Report			
Describe the status of the green infrastructure report due in year and progress towards making the practice allowable:	r 4 of the permit t	term, includii	ng the findings
To be conducted in future permit years.			
Retrofit Properties Inventory			
Describe the status of the inventory, due in year 4 of the permit be modified or retrofitted with BMPs to mitigate impervious ar modified or retrofitted:			*
To be conducted in future permit years.			
Catch Basin Cleaning Describe the status of the catch basin cleaning optimization pla Consistent with permit requirement 2.3.7.a.iii.2, the Town of States of the catch basin cleaning optimization pla		refine catch	basin cleaning op
If complete, attach the catch basin cleaning optimization plan of the optimization plan: The catch basin cleaning optimization plan of website:	r schedule is attac	ched to the er	nail submission
Below, report on the number of catch basins inspected and clearemoved from the catch basins during this reporting period.	ned, along with ti	he total volur	me of material
Number of catch basins inspected: 118			
Number of catch basins cleaned: 118			
Total volume or mass of material removed from	all catch basins:	591.28	tons

Town of Sudbury Page 14 Below, report on the total number of catch basins in the MS4 system, if known. Total number of catch basins: 3,000 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 refined 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 Sudbury intends to refine 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. O Number of miles cleaned: O Volume of material removed: [UNITS] • Weight of material removed: 1056.24 tons

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 Sudbury intends to refine 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:

In 2015, the Town of Sudbury developed a Clean Water Best Practices Manual for its municipal facilities, with a focus on those that have the potential to contribute to stormwater pollutants through common day-to-day activities. The manual outlines operations and maintenance procedures related to stormwater pollution avoidance, and includes Snow Disposal Recommended Procedures. The Town anticipates that this manual will be updated 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:

In 2015, the Town of Sudbury developed a Clean Water Best Practices Manual for its municipal facilities, with a focus on those that have the potential to contribute to stormwater pollutants through common day-to-day activities. The manual includes a list of municipal facilities with potential stormwater polluting activities that is updated on an ongoing basis. The Town anticipates that this manual will be updated 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:

In 2015, the Town of Sudbury developed a Clean Water Best Practices Manual for its municipal facilities, with a focus on those that have the potential to contribute to stormwater pollutants through common day-to-day activities. The manual outlines operations and maintenance procedures related to stormwater pollution avoidance. The Town anticipates that this manual will be updated 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 Sudbury will develop SWPPPs for the public works
yard and transfer station during Permit Year 2.

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

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

Potential corrective actions to be taken at the public works yard will be determined when, consistent with permit requirement 2.3.7.b, the Town of Sudbury develops a SWPPP for the public works yard and transfer station during Permit Year 2.

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 Sudbury 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
<i>Optional:</i> 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: Maryanne Bilodeau Title: Interim Town Mar

Signature: Maryanne Bilodeau Date: 9/30/19

[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