

**Year 2 Annual Report**  
**Massachusetts Small MS4 General Permit**  
**Reporting Period: July 1, 2019-June 30, 2020**

*\*\*Please DO NOT attach any documents to this form. Instead, attach all requested documents to an email when submitting the form\*\**

*Unless otherwise noted, all fields are required to be filled out. If a field is left blank, it will be assumed the requirement or task has not been completed. Please ONLY report on activities between July 1, 2019 and June 30, 2020 unless otherwise requested.*

**Part I: Contact Information**

Name of Municipality or Organization:

EPA NPDES Permit Number:

**Primary MS4 Program Manager Contact Information**

Name:  Title:

Street Address Line 1:

Street Address Line 2:

City:  State:  Zip Code:

Email:  Phone Number:

**Stormwater Management Program (SWMP) Information**

SWMP Location (web address):

Date SWMP was Last Updated:

If the SWMP is not available on the web please provide the physical address:

## Part II: Self-Assessment

First, in the box below, select the impairment(s) and/or TMDL(s) that are applicable to your MS4. Make sure you are referring to the most recent EPA approved Section 303(d) Impaired Waters List which can be found here: <https://www.epa.gov/tmdl/region-1-impaired-waters-and-303d-lists-state>

<b>Impairment(s)</b>				
	<input checked="" type="checkbox"/> Bacteria/Pathogens	Chloride	Nitrogen	<input checked="" type="checkbox"/> Phosphorus
	Solids/ Oil/ Grease (Hydrocarbons)/ Metals			
<b>TMDL(s)</b>				
<i>In State:</i>	<input checked="" type="checkbox"/> Assabet River Phosphorus	Bacteria and Pathogen	Cape Cod Nitrogen	
	Charles River Watershed Phosphorus	Lake and Pond Phosphorus		
<i>Out of State:</i>	Bacteria/Pathogens	Metals	Nitrogen	Phosphorus
				<b>Clear Impairments and TMDLs</b>

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 2 Requirements

- Completed Phase I of system mapping
- Developed a written catchment investigation procedure and added the procedure to the SWMP
- Developed written procedures to require the submission of as-built drawings and ensure the long term operation and maintenance of completed construction sites and added these procedures to the SWMP
- Enclosed or covered storage piles of salt or piles containing salt used for deicing or other purposes
- Developed written operations and maintenance procedures for parks and open space, buildings and facilities, and vehicles and equipment and added these procedures to the SWMP
- Developed an inventory of all permittee owned facilities in the categories of parks and open space, buildings and facilities, and vehicles and equipment and added this inventory to the SWMP
- Completed a written program for MS4 infrastructure maintenance to reduce the discharge of pollutants
- Developed written SWPPPs, included in the SWMP, for all of the following permittee owned or operated facilities: maintenance garages, public works yards, transfer stations, and other waste handling facilities where pollutants are exposed to stormwater

*Optional:* If you would like to describe progress made on any incomplete requirements listed above, provide any additional information, and/or if any of the above year 2 requirements could not be completed due to the impacts of COVID-19, please identify the requirement that could not be completed, any actions taken to attempt to complete the requirement, and reason the requirement could not be completed below:

Annual Requirements

- × Provided an opportunity for public participation in review and implementation of SWMP and complied with State Public Notice requirements
- × Kept records relating to the permit available for 5 years and made available to the public
- × The SSO inventory has been updated, including the status of mitigation and corrective measures implemented
  - This is not applicable because we do not have sanitary sewer
  - This is not applicable because we did not find any new SSOs
  - The updated SSO inventory is attached to the email submission
  - The updated SSO inventory can be found at the following website:

The current SSO inventory is attached to the email submission. There were no new SSOs this reporting period.

- × Properly stored and disposed of catch basin cleanings and street sweepings so they did not discharge to receiving waters
- × Provided training to employees involved in IDDE program within the reporting period
- × All curbed roadways were swept at least once within the reporting period
- × Updated outfall and interconnection inventory and priority ranking as needed

*Optional:* If you would like to describe progress made on any incomplete requirements listed above, provide any additional information, and/or if any of the above annual requirements could not be completed due to the impacts of COVID-19, please identify the requirement that could not be completed, any actions taken to attempt to complete the requirement, and reason the requirement could not be completed below:

The outfall and interconnection inventory is updated on an ongoing basis as dry weather screening is performed. The priority ranking will be updated after dry weather inspections are completed and before catchment investigations commence.

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

Annual Requirements

*Public Education and Outreach\**

- × Annual message was distributed encouraging the proper management of pet waste, including noting any existing ordinances where appropriate
- × Permittee or its agents disseminated educational material to dog owners at the time of issuance or renewal of dog license, or other appropriate time
- × Provided 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)*

*Optional:* If you would like to describe progress made on any incomplete requirements listed above or provide any additional details, please use the box below:

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

Annual Requirements

*Public Education and Outreach\**

- × Distributed an annual message in the spring (April/May) encouraging the proper use and disposal of grass clippings and encouraging the proper use of slow-release and phosphorus-free fertilizers
- × Distributed an annual message in the summer (June/July) encouraging the proper management of pet waste, including noting any existing ordinances where appropriate
- × Distributed an annual message in the fall (August/September/October) encouraging the proper disposal of leaf litter

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

*Good Housekeeping and Pollution Prevention for Permittee Owned Operations*

Increased street sweeping frequency of all municipal owned streets and parking lots subject to Permit part 2.3.7.a.iii.(c) to a minimum of two times per year (spring and fall)

*Potential structural BMPs*

Any structural BMPs already existing or installed in the regulated area by the permittee or its agents was tracked and the phosphorus removal by the BMP was estimated consistent with Attachment 3 to Appendix F. 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 were documented.

- The BMP information is attached to the email submission
- The BMP information can be found at the following website:

*Optional:* If you would like to describe progress made on any incomplete requirements listed above or provide any additional details, please use the box below:

Increased Street Sweeping - All roads were swept once and main roads were swept twice during the Year 2 period. The Town was unable to complete a second fall sweeping of all roads within a phosphorus impaired watershed before adverse weather conditions set in (e.g., snow, cold temperatures). Note that the entire Town and roadway network is within a phosphorus impaired watershed and the window for performing a second sweeping is extremely short. The Town is updating its sweeping program to identify those MS4 catchment areas that discharge directly to a phosphorus impaired water or its tributary vs. those that discharge into a wooded area, BMP, or other upgradient area. Roads within catchment areas with direct discharges will be prioritized for a second fall sweeping as these are more likely to contribute sediment and debris to a waterbody. Additionally, the Town cleans all of its catch basins annually, which removes debris that makes it into the drainage network before the outfall.

Potential Structural BMPs - Town-owned BMPs have been inventoried. Phosphorus loads and removals from existing BMPs have not yet been calculated. These estimates will be performed in Permit Year 3.

*Optional:* Use the box below to provide any additional information you would like to share as part of your self-assessment:

### Part III: Receiving Waters/Impaired Waters/TMDL

Have you made any changes to your lists of receiving waters, outfalls, or impairments since the NOI was submitted?

- Yes
- No

If yes, describe below, including any relevant impairments or TMDLs:

## Part IV: Minimum Control Measures

Please fill out all of the metrics below. If applicable, include in the description who completed the task if completed by a third party.

### MCM1: Public Education

Number of educational messages completed **during this reporting period:**

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

#### **BMP: 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 water customers along with dog bylaws.

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 bylaws outline the requirements for removing excrement left by dogs and fines for failure to do so. The bylaws are also posted on the Town's website with information on dog licenses.

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

Bylaws distributed to all dog owners during license renewal.

Message Date(s): May 2020

Message Completed for: Appendix F Requirements Appendix H Requirements X

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

If yes, describe why the change was made:

**BMP: Leaf Litter Mailing**

Message Description and Distribution Method:

The "Be a Leaf Hero" flyer was mailed to all Clinton water customers. It defines stormwater pollution and provides education on managing fallen leafs to keep the out of the drainage system.

Targeted Audience: Residents, Businesses, institutions and commercial facilities

Responsible Department/Parties: DPW

Measurable Goal(s):

Mailing sent to all residents and businesses.

Message Date(s): August 2019

Message Completed for: Appendix F Requirements X Appendix H Requirements X

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

If yes, describe why the change was made:

**BMP: Yard Care Mailing**

Message Description and Distribution Method:

The "Be A Yard Hero" flyer and "Green Grass & Clear Water" flyer was mailed to all Clinton water customers. They provide education on lawn care and fertilizer and pesticide use to keep chemicals out of stormwater runoff.

Targeted Audience: Residents, Businesses, institutions and commercial facilities

Responsible Department/Parties: DPW

Measurable Goal(s):

Mailing to all residents and businesses.

Message Date(s): Be a Yard Hero - February 2020; Green Grass/Clean Water - May 2020



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 (cancelled in 2020 due to COVID-19). The Middle school sixth grade class took a weeklong field day to Natures Classroom and learned about conservation, wildlife and stream and Pond ecosystems.

Targeted Audience: Residents

Responsible Department/Parties: Schools, DPW

Measurable Goal(s):

Continued education to various grade levels.

Message Date(s): October 2019 - Natures classroom trip for 6th 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 & Poster**

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 2020

Message Completed for: Appendix F Requirements Appendix H Requirements X

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

If yes, describe why the change was made:

Add an Educational Message

### MCM2: Public Participation

Describe the opportunity provided for public involvement in the development of the Stormwater Management Program (SWMP) **during this reporting period:**

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 performed periodic cleanups throughout the year.

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 this reporting period:**

### MCM3: Illicit Discharge Detection and Elimination (IDDE)

#### Sanitary Sewer Overflows (SSOs)

Check off the box below if the statement is true.

This SSO section is NOT applicable because we DO NOT have sanitary sewer

*Below, report on the number of SSOs identified in the MS4 system and removed **during this reporting period.***

Number of SSOs identified:

Number of SSOs removed:

### **MS4 System Mapping**

*Below, check all that apply.*

The following elements of the Phase I map have been completed:

- Outfalls and receiving waters
- Open channel conveyances
- Interconnections
- Municipally-owned stormwater treatment structures
- Waterbodies identified by name and indication of all use impairments
- Initial catchment delineations

*Optional:* Describe any additional progress you made on your map during this reporting period or provide additional status information regarding your map:

### **Screening of Outfalls/Interconnections**

*If conducted, please submit any outfall monitoring results from this reporting period. Outfall monitoring results should include the date, outfall/interconnection identifier, location, weather conditions at time of sampling, precipitation in previous 48 hours, field screening parameter results, and results from all analyses.*

- 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:

### **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:

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

No catchment investigations performed this period.

**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:

Number of illicit discharges removed:

Estimated volume of sewage removed:  gallons/day

*Below, report on the total number of illicit discharges identified and removed to date. At a minimum, report on the number of illicit discharges identified and removed **since the effective date of the permit (July 1, 2018).***

Total number of illicit discharges identified:

Total number of illicit discharges removed:

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

No illicit discharges found this period.

**Employee Training**

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

Employee training was performed on June 29, 2020 and included IDDE, SWPPP and SPCC training.

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

Number of site plan reviews completed: 4

Number of inspections completed: 6

Number of enforcement actions taken: 0

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

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

### **Ordinance or Regulatory Mechanism**

*Below, select the option that describes your ordinance or regulatory mechanism progress.*

- Bylaw, ordinance, or regulations are updated and adopted consistent with permit requirements
- Bylaw, ordinance, or regulations are updated consistent with permit requirements but are not yet adopted
- Bylaw, ordinance, or regulations have not been updated or adopted

### **As-built Drawings**

Describe 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:

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. As a result of the COVID-19 outbreak, regulations have not been adopted as planned during Permit Year 2. The Town now anticipates adopting stormwater regulatory updates as part of the Year 3 requirements under EPA's pending updated permit schedule.

### **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:

N/A, to be completed during 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:

N/A, to be completed during 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:

The Town completed an inventory of its permittee-owned properties. Facilities will be evaluated for potential BMP retrofit opportunities during future permit years.

**MCM6: Good Housekeeping****Catch Basin Cleaning**

*Below, report on the number of catch basins inspected and cleaned, along with the total volume of material removed from the catch basins **during this reporting period**.*

Number of catch basins inspected:

Number of catch basins cleaned:

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

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

Total number of catch basins:

*If applicable:*

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

Not yet applicable, pending collection of sediment data from catch basins over the next few years.

**Street Sweeping**

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

- Number of miles cleaned:
- Volume of material removed:  [Select Units]
- Weight of material removed:

**O&M Procedures and Inventory of Permittee-Owned Properties**

*Below, check all that apply.*

The following permittee-owned properties have been inventoried:

- Parks and open spaces
- Buildings and facilities
- Vehicles and equipment

The following O&M procedures for permittee-owned properties have been completed:

- Parks and open spaces
- Buildings and facilities
- Vehicles and equipment

**Stormwater Pollution Prevention Plan (SWPPP)**

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

Number of site inspections completed:

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

The SWPPP was developed at the end of Permit Year 2. SWPPP inspections will begin in Permit Year 3.

**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:

The Town has moved to a GIS-based platform for inspecting and cleaning catch basins that allows for real-time data collection. This information will be used to track cleaning and sediment accumulation in catch basins.

### **COVID-19 Impacts**

*Optional:* If any of the above year 2 requirements could not be completed due to the impacts of COVID-19, please identify the requirement that could not be completed, any actions taken to attempt to complete the requirement, and reason the requirement could not be completed below:

None of the organized/resident cleanups (Nashua River, South Meadow Pond) were completed this year because of COVID-19. These typically occur in April of each year.

As a result of the COVID-19 outbreak, regulations have not been adopted as planned during Permit Year 2. The Town now anticipates adopting stormwater regulatory updates as part of the Year 3 requirements under EPA's pending updated permit schedule.

DPW worked half-staff through the Spring and was unable to clean all of the catch basins in Town during the this period.

### **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 3 requirements summarized below. (Note: impaired waters and TMDL requirements are not listed below)

Yes, I agree

- Inspect all outfalls/ interconnections (excluding Problem and Excluded outfalls) for the presence of dry weather flow
- Complete follow-up ranking as dry weather screening becomes available

### **Annual Requirements**

- Annual report submitted and available to the public
- Annual opportunity for public participation in review and implementation of SWMP

- Keep records relating to the permit available for 5 years and make available to the public
- Properly store and dispose of catch basin cleanings and street sweepings so they do not discharge to receiving waters
- Annual training to employees involved in IDDE program
- Update inventory of all known locations where SSOs have discharged to the MS4
- Continue public education and outreach program
- Update outfall and interconnection inventory and priority ranking and include data collected in connection with the dry weather screening and other relevant inspections conducted
- Implement IDDE program
- Review site plans of construction sites as part of the construction stormwater runoff control program
- Conduct site inspection of construction sites as necessary
- Inspect and maintain stormwater treatment structures
- Log catch basins cleaned or inspected
- Sweep all uncurbed streets at least annually
- Continue investigations of catchments associated with Problem Outfalls
- Review inventory of all permittee owned facilities in the categories of parks and open space, buildings and facilities, and vehicles and equipment; update if necessary

Provide any additional details on activities planned for permit year 3 below:

## Part V: Certification of Small MS4 Annual Report 2020

### 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:  Title:

Signature:  Date:

*[Signatory may be a duly authorized representative]*