

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: U.S. Army Soldier Systems Center
EPA NPDES Permit Number: MAR042008

Primary MS4 Program Manager Contact Information

Name: Terence Garrahan Title: Stormwater Manager
Street Address Line 1: General Green Ave
Street Address Line 2: na
City: Natick State: MA Zip Code: 01760
Email: g.t.garrahan.civ@mail.mil Phone Number: (508) 206-4133

Stormwater Management Program (SWMP) Information

SWMP Location (web address): U.S. Army Soldier Systems Center, General Greene Ave, Natick, MA 01760
Date SWMP was Last Updated: Jan 6, 2020
If the SWMP is not available on the web please provide the physical address:
SWMP is available on DPW Environmental Share Drive Folder

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>

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

Leadership Observed Earth Day virtually in April, including a paragraph in newsletter that included a link to site that promoted protecting the environment. but will plan an in person Earth Day celebration April 2021, at which time a clean-up is also usually promoted. Posters for environmental protection should be available.

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:
- 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:

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

Catch basins inspected in fall and spring to assess sediment increase over winter. Most catch basins have an inch or less build-up. Sediment levels measured in all oil water separators to help establish service schedule. Most outfall location oil water separators have been measure for sediment build-up 75% of the outfalls have low levels of sediment build-up. For 2021, a contract is already in place to clean additional separators. The main outfall has the most sediment build-up, and contract is in place to remove 10 tons of sediment from this separator. Additional funding has been requested to remove an additional 10 tons for an option year. Data collected during the current contract will used for developing the next contract in 2023.

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:

Roundy pond drainage system is being reconstructed 2020/2021. Best Management Practices being implemented for erosion/sediment controls, and nearby catch basins covered.

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:[Drains to Water Way No Dumping]

Message Description and Distribution Method:

Note that this facility is a secure facility not open to the public.
For contractor awareness "Drains to water way No Dumping" type discs displayed near most catch basins.

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

Each spring inspect catch basins and re-install disc for awareness.
All catch basins have been inspected during the reporting year.
Brochures made available to planners and design engineers concerning Low Impact Design and complying with stormwater permits and regulations including MS4.

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:

MCM2: Public Participation

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

For construction projects on the installation, abutter notification letters were sent out to invite public to Conservation Commission Hearing concerning SWMP Best Management Practices (BMPs) being

implemented. For the Heritage Housing Project, positive feedback received at public meeting relative to tree planting BMP.

During reporting year slides concerning stormwater pollution prevention were presented to tenants. Also on-line environmental compliance training included stormwater requirements.

Training also was provided to CONVAULT fuel point operators that included stormwater pollution prevention such as having nearby spill kit available and no overfilling during fuel transfers.

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:**

A Virtual Public Hearing was held by the Town of Natick Conservation Commission for Building 38 Deck construction and fitness path re-routing. BMPs including sediment control was presented to the public. About notification letters were sent to neighbors proposed BMPs were approved during this public hearing. During COVID-19 Tele-working, stormwater coordinator continue to participate in Virtual Design meetings with contractors, planners and designers. Continue emphasis on good housekeeping, permit requirements discussed with contractors, importance of responding to oil/hazmat releases discussed. Planners included Low Impact Design in specifications and drawings.

Leadership Earth Day Message below April 22, 2020.

"today is Earth Day! One of the positives we have seen throughout this pandemic has been what appears to be a rapid recovery in our ecosystem. Check out <https://www.earthday.org/> for some ideas of ways you can personally contribute to improving and protecting our planet."

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:

Each catch basin was measure for sand levels. Overall most catch basins were identified as being clean. Catch basins along east side will require cleaning 2021.

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:

Employee Training

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

On line training is provided to employees who handle oil, hazardous chemicals or hazardous waste.

HAZMAT drill was conducted for employees that would respond to a release.

Training slides include oil spill prevention and storm water compliance including preventing spills from entering nearby catch basins. Boat and oil spill containment boom training was also conducted for spill contingency preparedness, and for containing spills should a release reach an outfall. HAZMAT employees are trained to be familiar with locations of outfalls as outfalls are inspected during training exercises.

MCM4: Construction Site Stormwater Runoff Control

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

Number of site plan reviews completed:

Number of inspections completed:

Number of enforcement actions taken:

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:

Oil water separator #4 replaced and contractor is required to provided as built for the new interceptor/ separator. Replacement tanks are of the same size so new as-built will be similar to prior set-up.

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:

Many catch basins during the past year have been serviced/upgraded by parking lot/street pavement company. Curbing along road/parking areas also repaired. Debris removed from around catch basin grates.

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:

For the S2PRINT projects, design includes permeable parking just the south of construction area. For the Building 42 addition project, two rain gardens were constructed.

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:

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:

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:

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:

Contractors reminded to sweep leaves/sandy debris near staging area.
Clean-housekeeping emphasized during construction review meetings.

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:

Approximately 18 tons sludge removed from Oil Water Separators during reporting period. Contractor in place to remove an additional 30 tons over the next three years.

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:

Spring Earth Celebration postponed.

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:

Information about stormwater compliance, Best Management Practices including Good Housekeeping, proper handling of fuel/oil, importance of spill response, and sediment/erosion controls.

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: Digitally signed by GARRAHAN.G.TER ENCE.1228554495 Date: 2020.09.25 14:48:09 -04'00'
 Date:

[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: stormwater.reports@epa.gov

MassDEP: laura.schifman@mass.gov

Paper Signature:

If you did not sign electronically above, you can print the signature page by clicking the button below.

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.