

**Year 2 Annual Report**  
**Massachusetts Small MS4 General Permit**  
**New Permittees**  
**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: US Army Garrison Fort Devens

EPA NPDES Permit Number: MAR042053

**Primary MS4 Program Manager Contact Information**

Name: Suzanne Richardson

Title: Natural Resources Specialist

Street Address Line 1: 30 Quebec St

Street Address Line 2: Box 10

City: Devens

State: MA

Zip Code: 01434

Email: suzanne.f.richardson2.civ@mail.mil

Phone Number: (978) 615-6086

**Stormwater Management Program (SWMP) Information**

SWMP Location (web address): Fort Devens DPW Server

Date SWMP was Last Updated: Apr 15, 2020

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

30 Quebec Street, Devens, MA, 01434 - 3rd Floor Conference Room

## Part II: Self-Assessment

*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.*

### 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
- Properly stored and disposed of catch basin cleanings and street sweepings so they did not discharge to receiving waters

*Optional:* If you would like to describe progress made on any incomplete requirements listed above, provide any additional information for your self-assessment, 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:

As a non-traditional MS4, Fort Devens did not complete a public notice in accordance with the State Public Notice requirements. Fort Devens did notify the public of Fort Devens through other means: EQCC meetings and Command-Staff meetings. A notice that the SWMP was available for review was included in the Fort Devens EQCC meeting 4 February 2020 and was presented during Command and Staff meeting by the ENVR Chief. Information on how to review the SWMP was also put on the Fort Devens website.

### 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? 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>

- Yes  
 No

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

## Part IV: Minimum Control Measures

*Part IV includes some of the metrics that will be required in upcoming annual reports. For this annual report, these metrics are optional for new permittees; please fill out any of the metrics below that you have started within this reporting period. Then, proceed to Part V.*

### 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:[Message name here]**

Message Description and Distribution Method:

Pamphlet  
 • How you can reduce your impact on Stormwater Pollution  
 • Pollution Prevention and you  
 • What we're doing at Fort Devens RFTA  
 • What is Stormwater?  
 • What should I do if there is a spill?  
 • What is illicit discharge?

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(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:

Pamphlet  
 • How you can help!  
 • Take Action at Home – Build a Rain Garden  
 • What is Stormwater Runoff?

- Why is Stormwater Runoff a Problem?
- Local Resources

Targeted Audience: Fort Devens Public

Responsible Department/Parties: Environment Department

Measurable Goal(s):  
50 Brochures printed and distributed to high use buildings and placed on the Fort Devens Website.

Message Date(s): 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:[Message name here]**

Message Description and Distribution Method:  
Website:  

- Proper use and disposal of grass clippings and encourages the proper use of slow-release and phosphorus free fertilizers.
- Encouraging the proper management of pet waste.
- Encouraging the proper disposal of leaf litter.
- Proper septic system maintenance.

Targeted Audience: Fort Devens Public

Responsible Department/Parties: Environmental Division, Directorate of Public Works

Measurable Goal(s):  
Information placed on the website for viewing.

Message Date(s): March 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:

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:**

Progress on SWMP, Stormwater Management Program, and future planning was conducted during the Environmental Quality Control Committee (EQCC) quarterly meetings of the reporting period. Due to COVID-19, only 3 of the 4 planned meetings occurred.

Public participation through the EQCC was listed under MCM1 in the NOI. The EQCC will likely be utilized for multiple MCMs under this permit in future reporting years.

Public participation in the development of the Stormwater Management Program (SWMP) accomplished, as proposed in the NOI included:

- Present quarterly at EQCC meetings and keep copies of slides or notes on Drawing Repository.
- Provided opportunity for public participation in stormwater management program at quarterly EQCC meetings.
- Maintained meeting minutes for qualifying construction projects.
- Posted information for stormwater program on website. Provided updates on plans, regulations and procedures.
- Provided opportunity for public to review SWMP and Annual Report.
- Created hotline/web line for reporting problems or violations.

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: 

*Below, report on the total number of SSOs identified in the MS4 system and removed to date. At a minimum, report SSOs identified **since the effective date of the permit (July 1, 2018)**.*

Total number of SSOs identified: Total 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

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

MS4 system mapping is a continuous process that is on-going. Elements will be updates as needed based on system updates and new information becoming available.

### **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:*

Screening of outfalls and catchment investigations were not conducted. Screening of outfalls is planned in upcoming reporting years in accordance with the revised timeline listed in section 1.10.3 of the permit. Catchment investigations are planned in upcoming reporting years in accordance with the revised timeline listed in section 1.10.3 of the permit.

**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:*

IDDE investigations were not conducted during the reporting period. No discharges were reported. IDDE investigations are planned in upcoming reporting years in accordance with the revised timeline listed in section 1.10.3 of the permit.

**Employee Training**



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

Employee training related to stormwater was not conducted during the reporting period. Training had been planned for May 2020 of the reporting year, but training had had to be postponed due to COVID-19, as in-person events were not allowed. Assessment of alternative training methods virtually is underway. Training is planned in upcoming reporting years in accordance with the revised timeline listed in section 1.10.3 of the permit.

### **MCM4: Construction Site Stormwater Runoff Control**

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

Number of site plan reviews completed:

Number of inspections completed:

Number of enforcement actions taken:

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

#### **Ordinance Development**

Describe the status of the post-construction ordinance required to be complete by year 3 of the permit term:

Post construction ordinance has not been developed. Fort Devens will assess if an ordinance is a viable course of action. As stated in section 5.1 of the permit, an ordinance may not be required for a non-traditional MS4.

#### **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:

As-built drawings are required on all construction projects occurring on Fort Devens, as part of contract agreements. The information is added to GIS and AutoCADD databases. Databases are continually updated as new information is provided.

#### **Street Design and Parking Lots Report**

Describe the status of the street design and parking lots assessment including any planned or completed changes to local regulations and guidelines:

The Street Design and Parking Lots report has not been completed. The report will be completed by year four of the permit term, in accordance with the revised timeline listed in section 1.10.3 of the permit.

### **Green Infrastructure Report**

Describe the status of the green infrastructure report, including the findings and progress towards making the practice allowable:

The Green Infrastructure Report has not been completed. The report will be completed by year four of the permit term, in accordance with the revised timeline listed in section 1.10.3 of the permit.

### **Retrofit Properties Inventory**

Describe the status of the inventory 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 Retrofit Properties Inventory has not been completed. The inventory will be completed by year four of the permit term, in accordance with the revised timeline listed in section 1.10.3 of the permit.

## **MCM6: Good Housekeeping**

### **Catch Basin Cleaning**

Describe the status of the catch basin cleaning optimization plan:

Catch basin cleaning occurred twice during the reporting year. Catch basin cleaning was completed on 8 Novem

*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:

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

Number of catch basins inspected:

Number of catch basins cleaned:

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

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

Total number of catch basins:

*If applicable:*

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

**Street Sweeping**

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

Street sweeping was conducted on 14 May 2020. Approximately 4.45 miles of road and 170 acres of parking lots were completed in the reporting year.

Current written procedures, for roadways with and without catch basins, are documented in the Performance Work Statement (PWS) in the Street Sweeping contract.

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

Number of miles cleaned:

Volume of material removed:  [Select Units]

Weight of material removed:  [Select Units]

*If applicable:*

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

Uncurbed roadways are also swept twice per year. DPW will perform visual inspections to determine if sweeping more often is necessary in future years.

**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

### **Winter Road Maintenance**

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

Winter road maintenance is conducted by the DPW including plowing, salting/sanding, and shoveling. Salt and sand is delivered to the site in 30-ton loads by truck. Salt and sand mix is stored in two locations at Fort Devens. Both storage areas are covered structures.

### **Stormwater Pollution Prevention Plan (SWPPP)**

Describe the status of any SWPPP 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:

The SWPPP will be updated during the next four years, according to the revised schedule listed in section 1.10.3 of the permit.

*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:

Installation wide procedures for stormwater treatment structure maintenance are not currently available. Written procedures for stormwater treatment structure maintenance will be created during the next four years, according to the revised schedule listed in section 1.10.3 of the permit.

## Part V: 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:

### **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:

Several impacts were noted from COVID-19 and potentially will continue into the next reporting year.

- Impacts to training schedules;
- Impacts to public participation;
- Impacts to public outreach and education; and
- Impacts to SWPPP due to travel restrictions for DoD.

### **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

- Complete IDDE ordinance
- Complete Construction/ Erosion and Sediment Control (ESC) ordinance
- Develop written procedures for site inspections and enforcement of sediment and erosion control measures
- Develop written procedures for site plan review

#### 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
- Continue public education and outreach program

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

The following list summarizes the stormwater activities planned by the Fort Devens during the 1 July 2020 to 30 June 2021 MS4 permit reporting cycle (Permit Year Three for the MS4 permit).

#### MCM 1 – Public Education

- Update and provide additional brochures in paper and digital format for distribution to the public.
- Update and provide newsletter or notification to provide seasonal reminders for water quality BMPs: lawn care, pet waste, use of salt/de-icing materials, Appendix H of the permit requirements, etc.
- Begin to mark storm drains.
- Participate in planning meetings for future projects.
- Update information on location of stormwater plan on website and provide updates on stormwater program, regulations, and procedures, as needed.
- Create and provide brochures to prospective contractors with general information on stormwater program and rules/regulations.
- Meet and participate with the Nashua River Watershed association
- Provide information on sustainability and ways to reduce water use and reduce waste generated. Provide updates to website providing information for the topics.

#### MCM 2 - Public Involvement and Participation

- Update SWMP.
- Have a public meeting for public involvement and participation with Stormwater Management Program.
- Provide Annual training and updates to employees and public.
- Perform cleanups through contracts and volunteer activities.
- Make SWMP and Annual Reports available for review by public.
- Participate in Nashua River Watershed Association meeting or event.

#### MCM 3 - Illicit Discharge Detection and Elimination

- Annually track SSO and update tracking spreadsheet.
- Continue to update Storm Sewer Map Phase 1 and 2.
- Create written IDDE program document.

- Conduct annual training related to IDDE.
- Conduct dry weather and wet weather screening (as necessary).
- Continue to update outfalls and interconnections in GIS database.

#### MCM 4 - Construction Site Stormwater Runoff Control

- Create and begin enforcement of Sediment and Erosion Control Ordinance.
- Create and begin enforcement of Site Plan Review written procedures and Erosion Control Measures procedures.
- Fort Devens will continue construction project inspections in support of this program.
- Reviews of project plans and SWPPPs for new construction projects will be performed, as applicable.
- Continue to promote green infrastructure and LID.
- Update waste control ordinances and procedures.

#### MCM 5 - Post-Construction Stormwater Management in New Development and Redevelopment

- Provide training on stormwater related topics.
- Continue to require as-builts for new construction projects.

#### MCM 6 - Good Housekeeping

- Cleaning of catch basins twice annually.
- Street sweeping twice annually.

#### Requirements Related to Water Quality Limited Waterbodies:

##### Phosphorus

- Distribute an annual message in the summer (June/July) timeframe encouraging the proper management of pet waste, including noting any existing ordinances where appropriate.
- Distribute an annual message in the fall (August/September/October) timeframe encouraging the proper disposal of leaf litter.
- Amend ordinance and other regulations to include a requirement that new development and redevelopment stormwater management BMPs be optimized for phosphorus removal.

##### E-Coli

- Distribute annual message encouraging the proper management of pet waste, including noting any existing ordinances where appropriate.
- Distribute annual message providing information about proper septic system maintenance.

## Part VI: 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 HALTER.LINDSEY.ELIZABETH.1137033298  
Date: 2020.09.23 10:56:53 -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](mailto:stormwater.reports@epa.gov)

MassDEP: [laura.schifman@mass.gov](mailto: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.*