

**Year 3 Annual Report**  
**Massachusetts Small MS4 General Permit**  
**Reporting Period: July 1, 2020-June 30, 2021**

*\*\*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, 2020 and June 30, 2021 unless otherwise requested.*

**Part I: Contact Information**

Name of Municipality or Organization: City of Brockton

EPA NPDES Permit Number: MAR041098

**Primary MS4 Program Manager Contact Information**

Name: Chike C Odunukwe, P.E.

Title: City Engineer

Street Address Line 1: 45 School Street

Street Address Line 2: Third floor, DPW

City: Brockton

State: MA

Zip Code: 02301

Email: codunukwe@cobma.us

Phone Number: 508-897-6437

**Stormwater Management Program (SWMP) Information**

SWMP Location (web address): <https://brockton.ma.us/wp-content/uploads/2020/03/ord-stormwater-attachment-3.pdf>

Date SWMP was Last Updated: Oct 28, 2019

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>

### Impairment(s)

- ☒ Bacteria/Pathogens
 ☐ Chloride
 ☒ Nitrogen
 ☒ Phosphorus  
☒ Solids/ Oil/ Grease (Hydrocarbons)/ Metals

### TMDL(s)

- In State:**
☐ Assabet River Phosphorus
 ☒ Bacteria and Pathogen
 ☒ Cape Cod Nitrogen  
☐ Charles River Watershed Phosphorus
 ☐ Lake and Pond Phosphorus  
**Out of State:**
☐ Bacteria/Pathogens
 ☐ Metals
 ☐ Nitrogen
 ☐ Phosphorus

Clear Impairments and TMDLs

Next, check off all requirements below that have been completed. **By checking each box you are certifying that you have completed that permit requirement fully.** If you have not completed a requirement leave the box unchecked. Additional information will be requested in later sections.

### Year 3 Requirements

- ☒ Inspected and screened all outfalls/interconnections (excluding Problem and Excluded outfalls)  
☒ Updated outfall/interconnection priority ranking based on the information collected during the dry weather inspections as necessary  
☐ Post-construction bylaw, ordinance, or other regulatory mechanism was updated and adopted consistent with permit requirements

**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 3 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:

We have not updated the Stormwater Ordinance nor the Stormwater Management Program, as inauguration of the Stormwater Authority was delayed due to the impact COVID 19 complications.

### 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:

This is not applicable, as we did not find any new SSO

- ☒ 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 system map due in year 2 as necessary
- ☒ Enclosed all road salt storage piles or facilities and implemented winter road maintenance procedures to minimize the use of road salt
- ☒ Implemented SWPPPs for all permittee owned or operated maintenance garages, public works yards, transfer stations, and other waste handling facilities
- ☒ Updated inventory of all permittee owned facilities as necessary
- ☒ O&M programs for all permittee owned facilities have been completed and updated as necessary
- ☒ Implemented all maintenance procedures for permittee owned facilities in accordance with O&M programs
- ☒ Implemented program for MS4 infrastructure maintenance to reduce the discharge of pollutants
- ☐ Inspected all permittee owned treatment structures (excluding catch basins)

*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:

Training for employees involved in IDDE program has not been implemented as a result of the impact of COVID-19 on our operations and staffing. We have not inspected all Permittee owned treatment structure due to impact of COVID-19 in staff recruitment. We intend to be more aggressive in staff recruitment this year, to have enough staff to run the program.

## **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:

**Nitrogen** (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) that encourages the proper use and disposal of grass clippings and encourages the proper use of slow-release 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 listed in Table 3 of Attachment 1 to Appendix H already existing or installed in the regulated area by the permittee or its agents was tracked and the nitrogen removal by the BMP was

- ☐ estimated consistent with Attachment 1 to Appendix H. The BMP type, total area treated by the BMP, the design storage volume of the BMP and the estimated nitrogen 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:

**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:

In lieu of June/July distribution educational material encouraging proper pet waste management, the Animal The City's Licensing Authority handout the materials, during licensing/license renewal and other contacts with Licensing Authority. Due to COVID-19 impact staff hiring for Stormwater Management operation is still lagging behind, there is not enough manpower to address the lagging tasks above

**Solids, Oil and Grease (Hydrocarbons), or Metals**

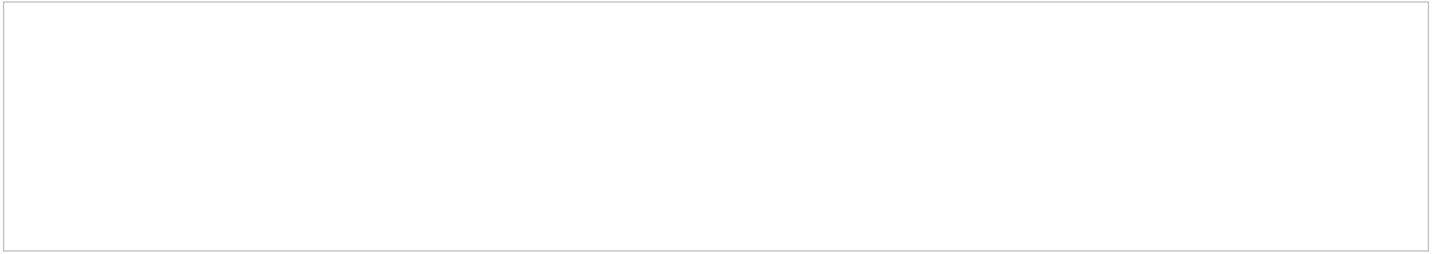
Annual Requirements

*Good Housekeeping and Pollution Prevention for Permittee Owned Operations*

- ☒ Increased street sweeping frequency of all municipal owned streets and parking lots to a schedule that targets areas with potential for high pollutant loads
- Prioritized inspection and maintenance for catch basins to ensure that no sump shall be more than 50
- ☒ percent full; Cleaned catch basins more frequently if inspection and maintenance activities indicated excessive sediment or debris loadings

*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:

*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:

A few new outfalls were located, but now within this last year.

## 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:[Message name here]**

Message Description and Distribution Method:

Other than the educational pamphlets that were mailed to individual homes and businesses, and given to pet owners during licensing and other engagements, we have not currently have the staff to conduct and monitor effectiveness educational messages.

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:

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### MCM2: Public Participation

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

We are yet to start this process as a result of COVID-19 impact on staffing for Stormwater Management operations for the City.



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**:

We have not started this process because the staffing problem, previously identified.

### **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**

*Optional: Provide additional status information regarding your map:*

We have not made addition progress in our mapping effort this year as a result of staffing problem that is made worse by the CPVID-19 impact.

#### **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. Please also include the updated inventory and ranking of outfalls/interconnections based on monitoring results.*

- ☒ No outfalls were inspected
- ☐ The outfall screening data is attached to the email submission
- ☐ The outfall screening data can be found at the following website:

We have not located additional outfalls/interconnections nor conducted outfall monitoring this period.

*Below, report on the number of outfalls/interconnections screened **during this reporting period**.*

Number of outfalls screened:

*Below, report on the percent of outfalls/interconnections screened **to date**.*

Percent of outfalls screened:

*Optional: Provide additional information regarding your outfall/interconnection screening:*

### **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.*

- ☒ No catchment investigations were conducted
- ☐ 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:*

Most of the public catchments have been investigated, but most private ones have not been investigated. These will be done as soon as enough staff is available to the Stormwater Authority, through the City Engineer.

### **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.*

- ☐ No illicit discharges were found
- ☐ The illicit discharge removal report is attached to the email submission
- ☐ The illicit discharge removal report can be found at the following website:

This has not started because of staff problem that is made worse by COVID-19 impact.

*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:

Illicit connection, removal and staff training will commence after staff is recruited and trained. We hope to overcome the impact of COVID-19 during the coming reporting period and recruit the necessary staff.

### **Employee Training**

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

Employee training has not started as there are no employee to train at this period, due to COVID-19 impact on the program.

### **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:

More than seventy construction site plans that fall under the City Stormwater Ordinance were reviewed this period, only five full under the EPA guidelines. All plans were reviewed to ensure that the design is in conformance with the City Ordinance standards, which is more stringent than the EPA guidelines. We do not have the staff for field inspection, but all that meet the EPA guidelines, also require Wetlands permit. The Wetland's Director conducts construction inspection on these sites.

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

#### **As-built Drawings**

*Below, report on the number of as-built drawings received **during this reporting period**.*

Number of as-built drawings received:

*Optional:* Enter any additional information relevant to the submission of as-built drawings:

Because of staff limitations, we have not started collecting as-built drawings. As-built drawings is part of the ordinance requirement, we would be staffed to start collecting the as-built drawing within the reporting period.

### **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:

Discussion with the Planning Department on has started on inspection requirements for approved sites during construction. Brockton's Stormwater Ordinance covers all aspects of land development; the more stringent requirement of any permitting authority, will take precedence at both design and construction phase of every project.

### **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:

The practice is currently being incorporated in some projects in their design. With adequate, we will push for more projects to embrace green infrastructure design.

### **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:

This will start as soon as we are properly staffed, during the next reporting period.

## **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:

Currently more than 50% of catch basins are cleaned each year, the uncleaned ones are cleaned ones are cleaned the following year. The catch basins that are found to be more than 50% full, are cleaned at frequencies that are required to keep them less than 50% full.

### **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:

### **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:

## **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 3 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:

Even after the lift on hiring was lifted, we still have problem hiring, we advertised and there was no response the any of the advertised Engineering positions. We have conducted some research and will be advertising again this fiscal year.

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

Yes, I agree ☒

- Develop a report assessing current street design and parking lot guidelines and other local requirements within the municipality that affect the creation of impervious cover
- Develop a report assessing existing local regulations to determine the feasibility of making green infrastructure practices allowable when appropriate site conditions exist
- Identify a minimum of 5 permittee-owned properties that could potentially be modified or retrofitted with BMPs to reduce impervious areas

### **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 curbed streets at least annually
- Continue investigations of catchments associated with Problem Outfalls
- Implemented SWPPPs for all permittee owned or operated maintenance garages, public works yards, transfer stations, and other waste handling facilities
- 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
- Review O&M programs for all permittee owned facilities; update if necessary
- Implement all maintenance procedures for permittee owned facilities in accordance with O&M programs
- Implement program for MS4 infrastructure maintenance to reduce the discharge of pollutants
- Enclose all road salt storage piles or facilities and implemented winter road maintenance procedures to minimize the use of road salt
- Review as-built drawings for new and redevelopment to ensure compliance with post construction bylaws, regulations, or regulatory mechanism consistent with permit requirements
- Inspect all permittee owned treatment structures (excluding catch basins)

Provide any additional details on activities planned for permit year 4 below:

Hire required staff to make City of Brockton completely operational.

## Part V: Certification of Small MS4 Annual Report 2021

### **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:

Chike C Odunukwe, P. E.

Title:

City Engineer

Signature:

Chike Odunukwe

Digitally signed by Chike  
Odunukwe  
Date: 2021.09.30 11:50:53 -04'00'

Date:

*[Signatory may be a duly authorized  
representative]*