

**Year 3 Annual Report**  
**Massachusetts Small MS4 General Permit**  
**New Permittees**  
**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:

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.*

<b><u>Impairment(s)</u></b>			
<input checked="" type="checkbox"/> Bacteria/Pathogens	<input type="checkbox"/> Chloride	<input type="checkbox"/> Nitrogen	<input checked="" type="checkbox"/> Phosphorus
<input type="checkbox"/> Solids/ Oil/ Grease (Hydrocarbons)/ Metals			
<b><u>TMDL(s)</u></b>			
<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
<a href="#">Clear Impairments and TMDLs</a>			

*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

- ☒ IDDE ordinance or other regulatory mechanism complete and adopted
- ☒ Construction/ Erosion and Sediment Control (ESC) ordinance or other regulatory mechanism complete and adopted
- ☒ Post-construction bylaw, ordinance, or other regulatory mechanism complete and adopted
- ☒ Developed written procedures for site inspections and enforcement of sediment and erosion control measures
- ☒ Developed written procedures for site plan review
- ☒ Kept a log of catch basins cleaned and inspected

*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:

The Devens Enterprise Commission (DEC) updated their regulations (974 CMR) to meet permit requirements for IDDE authority, erosion and sediment control, and post-construction stormwater management during Permit Year 3. Devens is also in the process of expanding IDDE authority to MassDevelopment, as MassDevelopment assists the DEC in meeting many requirements of the MS4 Permit. Updates to the MassDevelopment regulations (946 CMR) were drafted in Permit Year 3 to grant IDDE authority to MassDevelopment as well as the DEC. These updates will be adopted in Permit Year 4.

### 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
- ☒ All curbed roadways were swept at least once within the reporting period

*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:

### **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) that encourages the proper use and disposal of grass clippings and encourages 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:

Devens does not currently have any impaired water bodies with an approved TMDL for phosphorus. Devens does have direct discharges to water bodies that are impaired for phosphorus or that are tributary to water bodies that are impaired for phosphorus without an approved TMDL. Appendix H requires Devens to track and estimate the amount of phosphorus removed by structural BMPs installed as a result of the retrofit inventory conducted as part of the Phosphorus Source Identification Report, which is due in Permit Year 6. As dictated by the permit, at least one structural BMP must be installed by the end of Permit Year 8. Appendix H does not require permittees to estimate the amount of phosphorus removed by existing structural BMPs -- that is only a requirement for permittees discharging to a waterbody with an existing TMDL for phosphorus and therefore not applicable to Devens. However, once Devens begins installation of structural BMPs as identified as part of their Phosphorus Source Identification Report, they will track and estimate the phosphorus removed by the BMP consistent with Attachment 3 to Appendix F. Over the past year, Devens did finish a road reconstruction project where three existing separate drainage branches from Hospital Road, Elliot Road and Perimeter Road were replaced (deep sump catch basins were added) and were combined into one network, which conveys stormwater into a new infiltration basin and provides required recharge, attenuation of peak flows, and water quality treatment. Two outfalls discharging directly to Catacoonamug Brook, which flows into the Nashua River, which is impaired for phosphorus, were eliminated as part of this effort. Phosphorus reduction associated with the new infiltration basin has been calculated and pertinent information is attached separately to this report.

Under their updated post-construction stormwater management regulations (974 CMR), Devens will be tracking phosphorus removal attributable to structural BMPs on private developments. This effort will ensure that phosphorus reduction requirements are being met for new development and redevelopment, and will be useful should a TMDL be approved for the phosphorus-impaired waterbodies in Devens.

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

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### 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:

Devens is continuously updating its list of outfalls, interconnections, and receiving waters as new infrastructure is built and existing infrastructure changes ownership. The most recent list of outfalls, interconnections, and receiving waters is included in the SWMP. Devens has not had any impairments added or removed from any of its receiving waters since the effective date of the permit.

## Part IV: Minimum Control Measures

*Part IV includes some of the metrics that will be required in upcoming annual reports. For this annual report, please report on MCM1 and MCM2 and any other metrics below that have an asterisk (\*), along with any other metrics that you have started within this reporting period. Other than the metrics with an asterisk, the rest of the metrics are optional for new permittees. 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: Mailer/Virtual Course**

Message Description and Distribution Method:

Devens has developed comprehensive Green Infrastructure Guidelines for businesses and developers. During the reporting period, these guidelines were featured in the Devens Forward Climate Action Plan and in the Business Toolkit that was developed and distributed to all businesses in Devens: <https://kladashboard-clientsourcefiles.s3.amazonaws.com/Devens/Devens+Climate+Action+Toolkit+FINAL.pdf>

The guidelines were also featured in the Apple Country Natural Climate Solutions Project Report, which was developed in conjunction with Harvard and Bolton, MA under an initiative funded by the Municipal Vulnerability Preparedness (MVP) program: <https://climateresilient.wixsite.com/applecountry>

The DEC also produced an on-line course on Green Infrastructure for Green Roofs for the Healthy Cities Living Architecture Academy: <https://livingarchitectureacademy.com/p/street-trees-and-community-wellbeing>  
This course features the Devens Green Infrastructure Guidelines and was viewed by people throughout North America

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

The Green Infrastructure Guidelines and Climate Action Toolkit were distributed to every business owner in Devens. By collaborating with the towns of Harvard and Bolton and with the Healthy Cities Living Architecture Academy, Devens expanded their public education efforts to a regional and national scale.

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: Web Page**

## Message Description and Distribution Method:

The Devens Enterprise Commission continued to maintain stormwater information on its website. The information is on the "Devens Residents" page under the "Living Green: Resources for Devens Residents and Businesses" subheading: <http://www.devensec.com/residents.html>. Information is also posted on the DEC's "News and Events" page under the subheading "Devens Stormwater Management Education and Awareness Initiative": <https://www.devensec.com/news.html>. Flyers are posted on the News and Events page specifically targeting Devens residents and business owners in the Nashua River watershed.

Targeted Audience: Residents, Businesses, Institutions, and Commercial facilities

Responsible Department/Parties: MassDevelopment (Operations/Engineering)/Devens Enterprise Commission

## Measurable Goal(s):

The DEC website was maintained during Permit Year 3. The "Devens Residents" page had 624 visitors during the reporting period with 494 visitors clicking on a linked document; the "News and Events" page had 1,258 visitors during the reporting period, with 843 clicking on a linked document.

Message Date(s): FY2021

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: Web Page/Handout**

## Message Description and Distribution Method:

The Devens Enterprise Commission continued to maintain stormwater-related materials, documentation, regulations, and procedures on their website during the reporting period. All regulations specific to developers and industrial facilities are easily accessible on the "Development Services" page of the DEC website: <http://www.devensec.com/devserv.html>. Additional information continued to be provided on the "Sustainable Devens" page: <http://www.devensec.com/sustain.html>, and the DEC's Green Infrastructure Guidelines were posted to the website as well distributed to some prospective developers in person: [http://www.devensec.com/development/Green\\_Infrastructure\\_Guidelines\\_Final\\_8-12-14.pdf](http://www.devensec.com/development/Green_Infrastructure_Guidelines_Final_8-12-14.pdf)

Targeted Audience: Developers (construction). Industrial facilities

Responsible Department/Parties: MassDevelopment (Operations/Engineering)/Devens Enterprise Commission

## Measurable Goal(s):

By continuing to make this information available on its website, Devens informs potential developers of the environmental requirements associated with construction in the Devens Enterprise Zone, raising awareness of Low-Impact Development and Green Infrastructure practices. Hard copies of the Green Infrastructure Guidelines were also distributed to 6 prospective developers during the reporting period.

Message Date(s): FY2021



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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### **BMP:Flyer**

Message Description and Distribution Method:

A flyer regarding proper pet waste management was distributed with dog license issuances and renewals during the reporting period. Two new pet waste bag dispensaries were also installed in high traffic dog walking areas.

Targeted Audience: Residents

Responsible Department/Parties: MassDevelopment (Operations/Engineering)

Measurable Goal(s):

A flyer was distributed to 51 residents who applied for or renewed a dog license during the reporting period.

Message Date(s): FY2021

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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### **BMP: Flyer/Web Page**

Message Description and Distribution Method:

Devens developed flyers specifically targeting businesses and residents within the Nashua River watershed during Permit Year 3. The business flyer discusses the Nashua River's phosphorus and bacteria impairments as well as actions like proper parking lot sweeping, material storage, fertilizing, and snow and ice removal that business owners can take to reduce their impact on stormwater pollution. This flyer was posted to the Devens website: <https://www.devenscommunity.com/assets/work/pdfs/DevensStormwaterBusinesses05202021.pdf?cachebuster:34>

The residential flyer discusses actions like pet waste and yard waste management, proper fertilizer use, proper leaf litter disposal, and car maintenance that residents can take to reduce their impact on stormwater pollution.

Both flyers were distributed with the May 2021 newsletter, which reaches all residents and business owners in Devens: <https://cm.massdevelopment.com/t/ViewEmail/d/6B0C08622E665D892540EF23F30FEDED>

Targeted Audience: Businesses, institutions and commercial facilities

Responsible Department/Parties: MassDevelopment

Measurable Goal(s):

This flyer was posted during the reporting period and will be maintained throughout the permit term. The exact number of views the flyer had is unknown. While these flyers meet the additional public education requirements for phosphorus impairments, they were all distributed in the spring instead of in the timeframes specified in the permit.

Message Date(s): FY2021

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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### **BMP:Web Page**

Message Description and Distribution Method:

Devens maintained the Devens Community website during the permit term, which provides educational information to residents, business owners, and prospective developers. The website includes direct links to Devens' Stormwater Management Rules & Regulations, flyers discussing proper pet waste, yard waste, and leaf litter disposal, and a stormwater pollution prevention guide for homeowners. The stormwater webpage is located under the "Engineering" heading at this link: <https://www.devenscommunity.com/work/>

Targeted Audience: Residents, Businesses, institutions and commercial facilities, Developers

Responsible Department/Parties: MassDevelopment

Measurable Goal(s):

The website was maintained and available to the public throughout the permit year. The exact number of website views is not known.

Message Date(s): FY2021

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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### **BMP:Social Media**

Message Description and Distribution Method:

The Devens Enterprise Commission has active Facebook and Twitter pages, which were used to spread

educational information about stormwater management, climate change, and nature-based solutions during the reporting period. These posts are intended for multiple target audiences, as they range in topic from sustainable housing to the Devens' Complete Streets policy to the Devens Climate Action Toolkit for Businesses. The DEC made 8 posts relating to stormwater management, 19 relating to climate change, and 9 about nature-based solutions on Facebook and 7 posts about stormwater management on Twitter during the reporting period.

Targeted Audience: Residents, Businesses, institutions, and commercial facilities, Developers (construction)

Responsible Department/Parties: DEC

Measurable Goal(s):

The Facebook posts relating to stormwater management had 899 views. The Facebook posts about climate change and nature-based solutions had over 2,000 total views. The Twitter posts about stormwater management had 924 views.

Message Date(s): FY2021

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:**

Devens keeps their SWMP posted on their website for public review year-round. Hard copies of the SWMP are also kept at the MassDevelopment offices, the DEC office, and at the Department of Public Works.

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:**

Devens continued to provide public access to the recycling drop-off at the DPW facility and to provide access to the Regional Household Hazardous Products Collection Center during the reporting period, encouraging residents and business owners to properly handle all hazardous waste leaving their property. Yard waste was again collected on a weekly basis between April 1st and November 30th during the reporting period. Devens also continued to participate in the Eco-Efficiency Center, providing programs to assist local businesses in reducing the amount of waste they generate and the associated disposal costs. Devens is in the planning stages

of developing a stormwater-based curriculum for students in conjunction with the Nashua River Watershed Association. While delayed due to COVID-19, this curriculum will be developed and implemented in future permit years.

A public hearing was held on May 25, 2021 discussing MS4 permit requirements and providing the public with an opportunity to comment on the proposed updates to the DEC regulations. The updated regulations were also posted for public comment as part of the state's approval process.

Due to the impacts of COVID-19, the annual Earth Day clean-up event was once again postponed. This event will resume in Permit Year 4 assuming it is safe to do so. Devens also participated in the Nashua River Watershed Association, attending multiple meetings and participating as a voting member to the Wild and Scenic River Stewardship Council.

### **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:

As mentioned in Part III above, Devens is continuously updating its MS4 mapping, specifically the ownership status of its infrastructure. All changes to the MS4 map have been reflected in the SWMP.

**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:

*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:*

Devens will complete dry weather outfall and interconnection screening by June 30, 2024, as required for new permittees under the MS4 Permit.

**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:*

Devens finalized its IDDE Plan, along with its catchment prioritization and ranking and catchment investigation procedures during Permit Year 3. System Vulnerability Factors for each catchment were also finalized during Year 3. After dry-weather screening and sampling has been completed, the catchments will be reprioritized, and catchment investigations will proceed according to permit requirements.

**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:

*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 if conducted **during this reporting period**:

Devens will begin to conduct training on the IDDE program and Good Housekeeping/Pollution Prevention in Permit Year 4. Training is also planned to instruct Devens staff on outfall screening and sampling, and at least one training will be held on the Stormwater Pollution Prevention Plan (SWPPP) that was developed for the DPW facility.

### **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:

The Devens Enterprise Commission conducted 131 construction site inspections during the reporting period, which included erosion and sediment control inspections and inspections for overall project progress. While multiple inspections resulted in requested repairs, replacement and/or installation of erosion and sedimentation controls, enforcement actions were not necessary due to full compliance with requested corrective actions.

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

### **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:

Devens' existing regulations, prior to the updates in Year 3, required the submission of as-built drawings at the completion of construction and required long term operation and maintenance plans for on-site stormwater management systems to be submitted prior to project approval. No changes were made to these measures during Permit Year 3. Devens received 17 as-built plans from completed developments during the reporting period.

### **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:

Devens requires and incorporates LID practices for all public and private stormwater management projects where feasible. The Devens Enterprise Commission has parking maximums in place, as opposed to the minimums that other communities impose, as well as a Transportation Demand Management Program to reduce parking. 974 CMR 2.07, Street Design Standards, includes additional street types to reduce pavement and support LID. Sustainable indicators, such as impervious surface reductions from the incorporation of LID on private development projects, are monitored and tracked. The required street design and parking lots assessment report will be developed in Permit Year 6.

### **Green Infrastructure Report**

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

Devens continues to use and improve on green infrastructure guidelines to guide, regulate, and incentivize green infrastructure on all development and redevelopment projects: [https://devensec.com/development/Green\\_Infrastructure\\_Guidelines\\_Final\\_8-12-14.pdf](https://devensec.com/development/Green_Infrastructure_Guidelines_Final_8-12-14.pdf)

Impervious surface reductions in Devens are monitored in Sustainable Indicators Reports, and LID practices



are required for stormwater management projects where feasible. Devens will develop the required green infrastructure report in Permit Year 6.

### **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:

Devens will begin to assemble the retrofit properties inventory in Permit Year 6, as outlined in the SWMP, and as required in the permit for new permittees. Many retrofit projects implemented to date, including road diets on Pine Road, Grant Road, Hospital Road, Lovell Street, the Bristol-Meyers Squibb (BMS) parking structure, and at the military redevelopment on Barnum Road; porous pavement at CMTC and Tara Vista; and other LID projects have mitigated impervious area within the Devens Enterprise Zone.

As part of the Hospital Road road reconstruction project, three existing separate drainage branches from Hospital Road, Elliot Road and Perimeter Road were replaced (deep sump catch basins were added) and were combined into one network, which conveys stormwater into a new infiltration basin and provides required recharge, attenuation of peak flows, and water quality treatment. Two outfalls discharging directly to Catacoonamug Brook, which flows into the Nashua River, which is impaired for phosphorus, were eliminated as part of this effort.

## **MCM6: Good Housekeeping**

### **\*Catch Basin Cleaning**

Describe the status of the catch basin cleaning optimization plan:

See "Additional Information" field below.

*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:

During Permit Year 3, all 74 catch basins inspected were cleaned, regardless of the amount of material in each basin. As mentioned in the "Additional Information" section below, Devens is still in the process of collecting the data necessary to complete its catch basin optimization plan. Once complete, this plan will include procedures for actions to be taken if a catch basin sump is more than 50% full during two consecutive routine inspections or cleanings.

### **\*Street Sweeping**

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

Devens currently sweeps all public streets and municipal parking lots in the early spring, and then an average of once every 4 weeks, as needed. In Permit Year 3, all streets were swept four times. Devens will continue compiling its written Operation and Maintenance (O&M) Plan for municipal properties in Permit Year 4. The O&M Plan will include written procedures for sweeping streets and municipally-owned lots, and will be complete by June 30, 2022.

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:

*If applicable:*

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

Devens also sweeps rural, uncurbed roadways with no catch basins. Sweeping of these streets will be documented in the standard operation and maintenance procedures developed for municipal facilities and activities in Permit Year 4.

### **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:

Devens developed written winter road maintenance procedures during Permit Year 3. These procedures are included in the SWMP.

### **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:

Devens developed a draft SWPPP for its DPW Facility and the Devens Regional Household Hazardous Products Collection Center, which are on the same parcel. A preliminary site inspection was conducted on October 13, 2020. SWPPP implementation, including quarterly SWPPP inspections, will be conducted after the document is finalized in Permit Year 4.

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

Number of site inspections completed: 1

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

N/A

### **O&M Procedures for Stormwater Treatment Structures**

Describe the status of the written procedure for stormwater treatment structure maintenance:

Devens has existing procedures for stormwater treatment structure maintenance, which will be reviewed and optimized to ensure compliance with the 2016 MS4 Permit as part of the development of the overall written Operation and Maintenance Plan.

## 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:

Devens continued to collect data during the 2021 cleaning season as part of their optimization plan to ensure that no catch basin is more than 50% full. Data collected includes depth from the catch basin rim to the top of sediment, to the bottom of the basin, and to the invert of the outlet pipe. Devens will continue to collect data as needed until data is available for all catch basins. This data will be integrated into the Devens Drainage GIS and utilized to identify which catch basins are filling up more frequently and will therefore need to be cleaned more than once annually to ensure that the catch basin sump is never more than 50%.

### **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:

### **\*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 ☒

- Identify and develop inventory of all known locations where SSOs have discharged to the MS4 in the last 5 years
- Identify each outfall and interconnection discharging from MS4, classify into the relevant category, and priority rank each catchment for investigation
- Develop written IDDE plan including a procedure for screening and sampling outfalls
- Develop written procedures to require the submission of as-built drawings and ensure the long term operation and maintenance of completed construction sites and add these procedures to the SWMP
- Develop written operations and maintenance procedures for parks and open space, buildings and facilities, and vehicles and equipment and added these procedures to the SWMP
- Develop 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
- Complete a written program for MS4 infrastructure maintenance to reduce the discharge of pollutants
- Develop 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
- Enclose or cover storage piles of salt or piles containing salt used for deicing or other purposes

#### 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
- Sweep all curbed roadways at least once within the reporting period
- Provide training within the reporting period to employees involved in IDDE program
- Clean catch basins in accordance with catch basin cleaning procedures to ensure that no catch basin is greater than 50% full

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

**\*Part VI: 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.

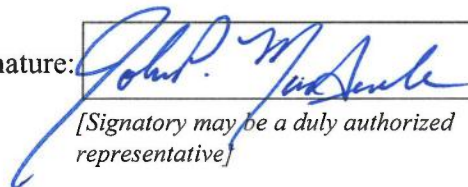
Name:

John P. Marc-Aurele, PE

Title:

Director of Engineering

Signature:

  
[Signatory may be a duly authorized representative]

Date:

9/28/21