

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: United States Coast Guard - Base Cape Cod

EPA NPDES Permit Number: MAR042047

Primary MS4 Program Manager Contact Information

Name: Mr. Scott Amirault Title: Environmental Protection Specialist, EHS

Street Address Line 1: USCG BCC Environmental Health and Safety - 5215 East Hospital Road

Street Address Line 2: NA

City: Buzzards Bay State: MA Zip Code: 02542

Email: scott.f.amirault@uscg.mil Phone Number: (508) 968-6502

Stormwater Management Program (SWMP) Information

SWMP Location (web address): <https://cg.portal.uscg.mil/units/dol/dol-3/BCC/f/ehs/SitePages/Home.aspx?RootFolder=%2Funits%2Fdol%2Fdol-3%2FBCC%2Ff%2Fehs%2FShared%20Documents%2FStormwater%20Plans%20%28SWMP%20-%20SWPPP%29&FolderCTID=0x0120004BFC8A476FFE1247BEFABA4825FCA89D>

Date SWMP was Last Updated: Jun 4, 2021

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

The SWMP is posted to the U.S. Coast Guard Base Cape Cod (BCC or 'Base') internal/portal site where it is available to the public that use the Base. The SWMP could not be posted to the external site because of security concerns.

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:

All outfalls were inspected and screening during the dry weather inspection that was conducted on June 11, 2021; no changes were made to the priority ranking based on observations and the information collected. The SWMP was updated to reflect all changes that were applicable to this small, non-traditional MS4.

Annual Requirements

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

- ☐ The updated SSO inventory is attached to the email submission
- ☐ The updated SSO inventory can be found at the following website:

- ☒ Properly stored and disposed of catch basin cleanings and street sweepings so they did not discharge to receiving waters
- ☒ Provided training to employees involved in IDDE program within the reporting period
- ☒ All curbed roadways were swept at least once within the reporting period
- ☒ Updated 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:

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

Based on staffing shortages and turnover, the effort to implement a formal IDDE training for incoming members of the USCG BCC Roads is planned for year 4. Informal OJT has been provided to staff members on a rolling basis during year 3.

Inspection of existing stormwater infrastructure conditions are ongoing. Repairs and upgrades are evaluated for implementation on a case by case basis taking elements of funding, staffing and requirements for environmental compliance into account.

BCC's SWPPP was updated/endorsed on June 11th IAW the newly published MSGP.

Part III: Receiving Waters/Impaired Waters/TMDL

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

☐ Yes

☒ No

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

Part IV: Minimum Control Measures

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

MCM1: Public Education

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

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

BMP:[Message name here]

Message Description and Distribution Method:

BCC provides general information about the environment and stormwater pollution prevention, specific to the Base. This existing housing policy distributes information to new residents on the environmental and stormwater pollution prevention programs at the time that they move in. Additional best management practices are provided in the BCC Housing Manual and during new employee check-ins with the environmental office.

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

Continue distributing stormwater information to new residents when they move to the base. During the reporting period 24 new residents moved to the base and were provided this information during check-in.

Message Date(s):

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

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

If yes, describe why the change was made:

MCM2: Public Participation

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

The stormwater management plan is be available for review by the audiences of BCC or agencies during working hours at the EHS office or on BCC's internal website. The SWMP is available and open for comment from public audiences through email.

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:**

BMP 2.3 - The Base continues to advertise to residents specific dates & times for BCC residents to properly dispose of household hazardous waste at Barnstable County's Household Hazardous Waste collection events on an annual basis. The first notice is put out in January with reminder emails being sent out as specific collection dates approach. BCC's Local Area Housing Office (LAH) now also provides this information upon resident check-in and HHW event flyers are posted at the BCC Recycling Center and LAH.

BMP 2.4 - Although the impacts of COVID-19 discouraged group clean-up gatherings, BCC successfully coordinated April base clean-up day connected to the celebration of Earth Day. An additional clean-up was conducted as part of the Coast Guard Day celebration in August but will be accounted for in the year 4 report

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:

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:

On June 11th 2021, USCG Environmental Health and Safety staff completed screenings while

performing assessments of the condition of all of the stormwater outfalls and conveyances at the Base. In total, 13 regulated outfalls and 7 non-jurisdictional discharges (pipes that do not discharge stormwater to waters of the US) were inspected. Outfalls and discharges were inspected for flow and evidence of illicit discharges. There was also no evidence of illicit discharge. Overcast and humid conditions were present during the course of the inspections; temperatures were in the mid to upper 70's. The 13 outfalls are located around Osborn (8), Spit (2), and Edmund (3) Ponds.

Outfalls were also inspected for physical deficiencies, change of sediment, eutrophication, increase or change in surrounding land use, and other hazards. Street sweeping and catch basin monitoring practices continue to minimize introduction of new deposits. USCG will be implementing improvements to the outfalls in the future.

*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:

N/A. No catchments were investigated during this permit year. Catchments will be investigated before they are due in 2028.

*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:

USCG will complete 100% of all catchment investigations within 10 years of the permit's effective date (by June 30, 2028).

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:

N/A. No illicit discharges were found or reported.

*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: 0

Number of illicit discharges removed: 0

Estimated volume of sewage removed: 0 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: 1

Total number of illicit discharges removed: 1

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

N/A

Employee Training

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

Stormwater Pollution Prevention and SPCC virtual training sessions were provided to USCG personnel during the month of December 2020. New members that reported to the base received an overview of Stormwater Pollution Prevention and SPCC training during their mandated base check-in procedures. OJT is provided on a rolling basis to staff members at the gas station 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: 1

Number of inspections completed: 1

Number of enforcement actions taken:

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

An emergency sewer line replacement project was undertaken in the residential area in March. No SSO resulted from the event. The area of disturbance was less than one acre and the disturbed area was restored to a 'whole' condition once work was completed.

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:

As-built plans for stormwater control structures are kept on record at the base. Long-term operation and maintenance is required to be performed by FED staff in consultation with the Stormwater Program Manager.

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:

The USCG BCC stormwater team held initial discussions to understand the intent of this report. The Street Design and Parking Lots Report will be completed by June 30, 2022 as an attachment to the SWMP.

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:

This requirement is not applicable to BCC. The permit states an exemption in permit part 5.1.3: "Non-traditional MS4s do not need to meet the requirements (for a Green Infrastructure Report) in part 2.3.6.c."

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:

USCG held initial discussions to understand the intent of this inventory. The purpose and basic outline of the report are included in BMP 5.4 of the SWMP. The retrofit opportunities list will be completed by June 30, 2022 as an attachment to the SWMP and will be updated annually thereafter as needed. Beginning with the fifth-year annual report and in each subsequent annual report, BCC will identify additional sites and infrastructure that could be retrofitted. BCC shall maintain a minimum of 5 sites in their inventory, until such a time as when there are less than 5 sites remaining. In addition, BCC will report on all properties that have been modified or retrofitted with BMPs to mitigate impervious area that were inventoried in accordance with this part.

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:

Five catch basin sumps were identified as being as more than 50% full during the year 2 investigations. A staffing shortage and budget shortfall prevented the year 2 cleaning from taking place as planned. An additional 6th basin was identified during year 3 inspections. BCC is actively developing a plan to conduct the sump cleaning via contract services in Spring 2022.

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: 7

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

Corrective actions include repairs to leaking vehicle POL lines and restoring integrity of secondary containment structures.

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:

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:

See the attached MCM tasks and implementation schedule reflecting year 3 accomplishments and updates. BCC will make every effort to fulfill all year 4 minimum control measures and other assigned tasks in light of the ongoing COVID-19 pandemic, staffing shortages and potential budget constraints.

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:

Ms. Elizabeth L. Kirkpatrick

Title:

Environ. Protection Specialist CEU

Signature:

Elizabeth L.
KirkpatrickDigitally signed by Elizabeth L.
Kirkpatrick
Date: 2021.09.27 11:47:07 -04'00'

Date:

09/27/21

*[Signatory may be a duly authorized
representative]*