

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: Town of Westborough

EPA NPDES Permit Number: MAR041173

Primary MS4 Program Manager Contact Information

Name: Lisa Allain, PE

Title: Town Engineer

Street Address Line 1: 131 Oak Street

Street Address Line 2:

City: Westborough

State: MA

Zip Code: 01581

Email: lallain@town.westborough.ma.us

Phone Number: (508) 366-3076

Stormwater Management Program (SWMP) Information

SWMP Location (web address): https://www.town.westborough.ma.us/sites/g/files/vyhlf5176/f/uploads/swmp_rev._9-2020.pdf

Date SWMP was Last Updated: Sep 25, 2020

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:

Due to impacts of COVID-19 the Town had to prioritize areas of permit compliance given limitations in funding and staff time. While some of these challenges still remain, the Town has contracted with a consultant to develop a sampling plan and conduct IDDE training for staff involved with the IDDE program. The Town is committed to completing its screening and sampling requirements as expeditiously as possible. The Town has also contracted with its consultant to conduct a regulatory review and update bylaws to be consistent with permit requirements. It anticipates completing this requirement in 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

- ☒ 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:

https://www.town.westborough.ma.us/sites/g/files/vyhlf5176/f/uploads/sso_inventory_8-2021_update.pdf

- ☒ 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:

Due to limitations in funding and staffing, the Town is in the process of updating its inventory and O&M program for permittee owned facilities. The Town is also planning on getting some initial and targeted IDDE training under its current contract with its consultant, as well as taking advantage of recorded IDDE training through the Central Massachusetts Regional Stormwater Coalition.

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:

There is a link to the pet waste flyer on the stormwater page of the town website: https://www.town.westborough.ma.us/sites/g/files/vyhlif5176/f/uploads/westborough_dog_owners_-_help_westborough_keep_its_stormwater_clean.pdf

The Town intends on including proper pet waste management flyers with dog licenses moving forward.

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)

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 Year 2, the Town distributed public education materials related to landscaping best practices. These materials continue to be available on the Town's stormwater webpage. The Town intends to publicize these materials in future years, as well as taking advantage of Think Blue public information campaigns.

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:

The Town has previously shared landscaping educational materials to residents via the Town's Facebook page. These materials continue to be available via the Town's Stormwater Management website

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

The Town is in the process of reviewing and streamlining all education and outreach materials with the intent of meeting all permit requirements on an annual basis. Messaging is being adapted and adopted to meet these requirements.

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: Stormwater Management Website (SWMP 1.A)

Message Description and Distribution Method:

Town stormwater website is maintained and updated regularly with new information

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

Page views: 848 page views, 609 unique page views in Year 3

<https://www.town.westborough.ma.us/town-engineer/pages/stormwater-information>

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: Think Blue Massachusetts Advertising Campaign

Message Description and Distribution Method:

Town will maintain a link to the “Think Blue Massachusetts” organization website. Think Blue assists MS4 communities by maintaining their website and creating advertising campaigns targeting different audiences aimed to help viewers visualize stormwater pollution issues.

The current advertising campaign is a YouTube video called “Fowl Water: Think Blue Massachusetts” and can be found on the Think Blue Massachusetts homepage on the town stormwater page (<https://www.thinkbluemassachusetts.org/>)

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

Social media impression estimated for Westborough residents.

Facebook and Google provide aggregate information for the Central Massachusetts Region and impressions have been allocated among each city in the region on a proportional basis using US Census estimates of the population.

~30,954 total impressions from the FY2021 "Fowl Water" campaign via Facebook, Instagram, and YouTube sponsored video advertisements: <https://www.thinkbluemassachusetts.org/fowl-water-videos-results>.

Message Date(s): May 17 through June 4, 2021

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: Bacteria/ Pathogens Impairment Requirements (SWMP 1.H)

Message Description and Distribution Method:

There is a pet waste flyer on the Town stormwater page.

https://www.town.westborough.ma.us/sites/g/files/vyhlf5176/f/uploads/westborough_dog_owners_-_help_westborough_keep_its_stormwater_clean.pdf

Targeted Audience: Residents

Responsible Department/Parties: DPW Engineering/ IT Department/ Board of Health Department

Measurable Goal(s):

Pet waste flyer is on the stormwater page of the town website.

Page views: 848 page views, 609 unique page views in Year 3

Message Date(s): year-round

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:**

The Stormwater Management Plan (SWMP) is available on the stormwater page of the Town website for public review, comment, and involvement.

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:**

The Town coordinated the assistance of a local Girl Scout troop in June of 2021 to conduct storm drain stenciling in neighborhoods where improper pet waste disposal is a known issue. Approximately 75 storm drains were stenciled.

The Town also held a Town-Wide Earth Day Cleanup event during the week of April 10-17.

In an effort to continue advocating for smart water practices, the Town sold 17 discounted rain barrels this year from May 17-21st 7:30am-3:00pm and sold out!

The Town did not hold a hazardous waste collection day in Year 3, but the DPW facility still offers waste disposal on a daily basis, Monday through Friday 7am-3pm.

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:

The system map of outfalls, interconnections, catchment delineations, and detention basins was updated in September 2020. These maps are available on the Town's stormwater webpage at:

https://www.town.westborough.ma.us/sites/g/files/vyhlf5176/f/uploads/outfallwatershedmap_town.pdf

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:

Due to impacts of COVID-19 the Town had to prioritize areas of permit compliance given limitations in funding and staff time. While some of these challenges still remain, the Town has contracted with a consultant to develop a sampling plan and conduct IDDE training for staff involved with the IDDE program. The Town is committed to completing its screening and sampling requirements as expeditiously as possible.

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:

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:

The Town is currently working with its consultant to develop an IDDE sampling plan and anticipates conducting its screening and sampling in Year 4.

Employee Training

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

IDDE compliance is a primary focus for the Town in Year 4, part of which is getting relevant staff up to speed, including hosting trainings.

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:

Engineering has teamed up with the Conservation Director to be able to increase Town presence on jobs.

Site plans are not required with every permit application. The Town estimates 75% of project, or 117, required site plan review in Year 3.

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:

The submission of as-built drawings is a condition for site occupancy on many types of projects. The Town has also created a checklist that lists requirements so people are aware of the requirements during construction.

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 Town has not begun work on this requirement at this time.

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 Town has not begun work on this requirement at this time.

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:

The Town has identified three possible project at the DPW location that could be retrofitted with BMPs to mitigate impervious areas. The town intends to work further on this requirement in Year 4.

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:

The Town increases the frequency of inspections and cleaning. Based on its experience and due to its increased street sweeping frequency and the fact that the Town no longer uses sand to treat roads, the Town's catch basin sumps are usually below the 50% full benchmark.

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:

Removal of sodium hypochlorite tank – this was an unused tank that was kept under a shelter, but showed signs of corrosion with the potential for future leakage that could flow to areas outside the limits of protection and combine with stormwater runoff. The contents were removed, the tank was dismantled and all was disposed properly

Unused vehicles and equipment – staff noticed that hydraulic fluid and oil were dripping from our fleet of excess equipment. Dozens were auctioned off to reduce the threat of leakage combining with site runoff.

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:

The Town did not formally document SWPPP inspections during Year 3, however inspections do occur regularly and identified items for corrective actions. The Town plans to better document its SWPPP inspections in Year 4.

COVID-19 staff shortages and reduced work schedules caused the Town to prioritize certain areas of permit coverage. Good Housekeeping measures are completed routinely; however, the Town will be moving toward formalized documentation for the FY21 reporting period per the current SWMP.

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:

Due to COVID-19, the Town experienced staff shortages and reduced work schedules that complicated its efforts toward achieving its Year 3 goals. The Town has recently hired a consultant to aid in compliance. The Town is committed to refocusing staff time and resources with a goal of full permit compliance moving forward.

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:

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:

Christopher D. Payant

Title:

Director, DPW

Signature:

Christopher D.
Payant Digitally signed by Christopher D.
Payant
Date: 2021.09.29 13:42:53 -04'00'

Date:

09/29/21

*[Signatory may be a duly authorized
representative]*