

# 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 Wilmington

EPA NPDES Permit Number: MAR041234

### Primary MS4 Program Manager Contact Information

Name: Paul M. Alunni

Title: Town Engineer

Street Address Line 1: 121 Glen Road, Room 7

Street Address Line 2:

City: Wilmington

State: MA

Zip Code: 01887

Email: palunni@wilmingtonma.gov

Phone Number: (978) 658-4499

### Stormwater Management Program (SWMP) Information

SWMP Location (web address): [www.wilmingtonma.gov/public-works/stormwater-management/pages/ms4-permit](http://www.wilmingtonma.gov/public-works/stormwater-management/pages/ms4-permit)

Date SWMP was Last Updated: Sep 23, 2021

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

na

## 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:

### 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:

[www.wilmingtonma.gov/public-works/stormwater-management/pages/ms4-permit](http://www.wilmingtonma.gov/public-works/stormwater-management/pages/ms4-permit)

- ☒ 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:

The Town Operations Manager of the DPW conducts an annual IDDE training course covering topics such as, "what to look for" and "who to contact", we also review exceptions not considered illicit discharges, permits required for legal sump pump connections, and enforcement/fines. The last training occurred on December 5, 2019 (Reporting Year 2) and included 27 DPW labor and operations personnel. Due to Covid, the Operation's Division of Public Works did not convene for a group training this current reporting year (Year 3). However, with vaccines, and PPEs in place, we plan to continue training this November for Reporting Year 4.

**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) encouraging the proper use and disposal of grass clippings and encouraging the proper use of slow-release and phosphorus-free fertilizers
- ☒ Distributed an annual message in the summer (June/July) encouraging the proper management of pet waste, including noting any existing ordinances where appropriate
- ☒ Distributed an annual message in the fall (August/September/October) encouraging the proper disposal of leaf litter

*\* Public education messages can be combined with other public education requirements as applicable (see Appendix H and F for more information)*

#### *Good Housekeeping and Pollution Prevention for Permittee Owned Operations*

- ☒ Increased street sweeping frequency of all municipal owned streets and parking lots subject to Permit part 2.3.7.a.iii.(c) to a minimum of two times per year (spring and fall)

#### *Potential structural BMPs*

Any structural BMPs already existing or installed in the regulated area by the permittee or its agents was tracked and the phosphorus removal by the BMP was estimated consistent with Attachment 3 to Appendix F. The BMP type, total area treated by the BMP, the design storage volume of the BMP and the estimated phosphorus removed in mass per year by the BMP were documented.

- ☐ The BMP information is attached to the email submission
- ☐ The BMP information can be found at the following website:

*Optional:* If you would like to describe progress made on any incomplete requirements listed above or provide any additional details, please use the box below:

Potential Structural BMPs Note: Currently N/A to the Town of Wilmington. The Aberjona River Watershed is very small and encompasses Industrial Way, Eames Street, and Jewell Drive. The Town is unaware of any municipally owned structural BMPs within this watershed.

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

Potential Structural BMPs Note: Currently N/A to the Town of Wilmington. The Aberjona River Watershed is very small and encompasses Industrial Way, Eames Street, and Jewell Drive. The Town is unaware of any municipally owned parcels or structural BMPs within this watershed. However, the Town has been very active in educating owners with LUHPPL in the Aberjona River. Any new or redevelopment must meet the

recently promulgated phosphorus removal regulations, and emphasis is placed on infiltration and filtration practices. Recently, Analog Devices (Town's largest taxpayer that owns a compound in the Aberjona River Watershed) installed a green roof, constructed gravel wetland, bioretention systems, and infiltration systems throughout their campus as part of a new and redevelopment project.

### **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:Leaf Litter Brochure**

Message Description and Distribution Method:

Mailed a brochure to property owners in the Aberjona River watershed related to the benefits of proper leaf cleanup and disposal.

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

Provide information for curbside pickup dates, benefits of composting, and keeping leaf litter out of storm drains and wetland resource areas.

Message Date(s):

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

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

If yes, describe why the change was made:

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#### **BMP:Fertilizer Brochure**

Message Description and Distribution Method:

Mailed Brochure regarding use of fertilizer and dangers of excessive phosphorus/nitrogen in lawn care/maintenance.

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

Educate property owners in the Aberjona River Watershed about the dangers of excess nutrients in stormwater runoff resulting from improper lawn care techniques.

Message Date(s): April 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:

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### **BMP: Pet Waste Brochure**

Message Description and Distribution Method:

Mailed brochure regarding proper pet waste disposal and effects of improper disposal.

Targeted Audience: Residents

Responsible Department/Parties: Engineering

Measurable Goal(s):

Reduce pet waste in catch basins, and reduce pollutant discharges to receiving waters. The Town had reports of previous issues regarding pet waste bags being disposed of in catch basins. Since the messages have been sent, our catch basin cleaning crew has not reported any pet waste bags being collected from catch basins.

Message Date(s): May 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:

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### **BMP:Septic System Maintenance**

Message Description and Distribution Method:

Door Hanger regarding proper operation and maintenance of on-site sewage disposal systems (septic systems).

Targeted Audience: Residents

Responsible Department/Parties: Engineering

Measurable Goal(s):

Issue door hanger to residents with septic systems in the Shawsheen River Watershed regarding proper care and maintenance of septic systems.

Message Date(s): June 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:

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### **BMP:Pet Waste - at Town Clerk's Office**

Message Description and Distribution Method:

Pet Waste Brochure distributed with Dog Licenses. Brochure that details the benefits of proper pet waste disposal.

Targeted Audience: Residents

Responsible Department/Parties: Town Clerk's Office

Measurable Goal(s):

Issue pet waste brochure to residents with dog license's to educate on the benefits of cleaning up after your pet.

Message Date(s): On-going

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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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 entire Stormwater Management Program has been posted to the Town's public website at <https://www.wilmingtonma.gov/public-works/stormwater-management/pages/ms4-permit>

A link has also been provided to a public email address to send comments accordingly.

At the April 2021 Annual Town Meeting, the public was given an opportunity to weigh in on the MS4 stormwater program as two (2) related articles were on the warrant. The first warrant article relating to the

MS4 permit was to see if the Town would vote to change the Town's Local Comprehensive Stormwater Bylaw to comply with Section 2.3.6 of the MA MS4 General Permit. The second warrant article relating to the MS4 permit was to see if the Town would vote to a budget increase of 50,000 to fund implementation of Section 2.3.7 of the MA MS4 General Permit and the various elements of the Town's SWM Program (IDDE program, and Education messages).

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 Engineering Division also coordinated with a local Brownie Scout Troop Leader (Resident). The meetings/activities Troop #82787 reported that were related to stormwater topics included (the following is cut/pasted directly from an email from the Troop Leader):

12/13/20: Service Project

- Trash Pickup at Yentile Park
- Troop provided the gloves, masks, and garbage bags and the girls volunteered their time to collect trash around the park!

1/20/21: Wonders of Water Journey Badge (Part 1)

- Talked about how we use water, why we love water, and water landmarks in the community (Silver Lake, etc.)
- Watched a video on the water cycle and made “rain in a bag” – water in ziplock bag, tape/hang it in a sunny window, and watch the water cycle at work at home!
- Talked about water use, water conservation, and the girls logged water use over the next two weeks in their homes.
- Did a virtual watershed demonstration – Cans/cups covered in a sheet of tin foil within a long shallow tupperware container to form topography. We poured water over the tin foil and observed where it went. Then sprinkled some cocoa powder (pollution) on the landscape and made it rain again. Made some observations on where the pollution goes.
- Read Dwayne the Storm Drain (MWRA coloring book).
- Mason jar experiment with tissues, paper towels, wipes, and lastly toilet paper to understand what to flush and what not to flush!
- Homework: Track water usage and share knowledge with your families!

2/3/21: Wonders of Water Journey Badge (Part 2)

- Came back to the meeting to talk about water uses and the ways they implemented water conservation techniques in their daily lives.
- Planned their TAKE ACTION project – the girls decided on a poster campaign to let the community know about keeping our waterways clean!

The Town of Wilmington Engineering Division has been using winning posters of the Brownie Troop project in our educational brochures citing the first name of the artist and troop number (per the request of their parents).

### **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:*

All MS4 outfalls within the Town of Wilmington have been field survey located and mapped accordingly on the Town's GIS mapping platform. A GIS mapping site was created (in Reporting Year 1) for public viewing at [www.mapsonline.net/wilmingtonma/ms4](http://www.mapsonline.net/wilmingtonma/ms4). This map is dynamic - and continuously updated with data collected related to new outfalls, revisions, street sweeping tracking, catch basin inspection and cleaning data/tracking, and BMP locations. Included on the map are the receiving waters and their corresponding sub-watershed boundary (subwatershed boundary ID numbers correlate to the MassGIS data layer numbering system). The Town of Wilmington has developed a complete Drainage System Master Plan, which includes GIS mapping of the Town's entire drainage system. All infrastructure was GPS located.

Mapping includes topography, stormwater BMPs (i.e. existing retention basins, and infiltration basins), catch basins, drain manholes, and pipe network system. The Town has also mapped the entire sanitary sewer system, complete with rim and invert data based on record as-built drawings. Given the relatively young age of the Town's Sewer System (c.1970s to present), record information was found to be very accurate.

Waterbodies identified by name and indication of all use impairments, and initial IDDE catchment delineations were mapped and posted on the publicly viewable GIS 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:

*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:

[www.wilmingtonma.gov/public-works/stormwater-management/pages/ms4-permit](http://www.wilmingtonma.gov/public-works/stormwater-management/pages/ms4-permit)

*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:*

Town detected dry weather flow at 8 of the 463 MS4 system outfalls. Each of the 8 catchments were reviewed for potential for Illicit Discharge connections and/or flow. Laboratory testing revealed only 1 of the 8 catchments contained a pollutant level (bacteria and ammonia) that exceeded MA MS4 GP thresholds. This outfall is located on Coolidge Road which is ID 17019-26 (location provided on the publicly available Town's MS4 GIS map). This area is NOT served by sewer so, Engineering Division has been actively trying to find the source of this discharge. A neighboring home was recently razed and reconstructed with a new septic system. As such, the issue may have been with the previous home's failing septic system, which would explain the current lack of evidence. We plan to retest the outfall in October 2021 to see if levels are acceptable (now that the new septic is installed).

### **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:

Illicit Discharge No. 1: Found February 7, 2020: Fire Dept called MassDEP to report a caller complaining about Superior Sealcoating at 234 Andover Street parking lot runoff entering a nearby catch basin. MassDEP identified a minor sheen entering catch basin. DPW helped find the outfall and a minor sheen was observed. MassDEP providing containment measures and absorbant materials, dealing directly with property owner for fining and reimbursement. Contacts: Christopher Bresnahan, Environmental Engineer MassDEP 978-694-3377 and Joshua Lowman Environmental Analyst MassDEP 978-694-3318 / cell 857-354-0153

Illicit Discharge No. 2: Found April 14, 2020. Police called DPW after hours to report a motorist is reporting a sewer backup at 5 Cornell in the parking lot. Building is not on town sewer. DPW dispatched to investigate and it appears building is on a pump tank septic system which is cycling improperly and causing sewage to overflow out of manhole cover, into parking lot, and into Cornell Place. Gray water is heavily dilluted, perhaps do to a broken pipe or running water in building. Health Director responded and was able to track down owner of building by tapping on window. Owner called contractor to repair issue. Health Director not concerned with gray water flow into the street due to dilution rate. No fine issued.

### **Employee Training**

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

The Town Operations Manager of the DPW conducts an annual IDDE training course covering topics such as, "what to look for" and "who to contact", we also review exceptions not considered illicit discharges, permits required for legal sump pump connections, and enforcement/fines. The last training occurred on December 5, 2019 (Reporting Year 2) and included 27 DPW labor and operations personnel. Due to Covid, the Operation's Division of Public Works did not convene for a group training this current reporting year (Year 3). However, with vaccines, and PPEs in place, we plan to continue training this November for Reporting Year 4.

The Town is also a member of the NMCOG Stormwater Collaborative and attends periodic training offered through the collaborative.

### **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: 70

Number of enforcement actions taken: 3

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

Inspections number based on Erosion and Sedimentation Control Inspections by Planning and Conservation (70) which includes stormwater BMP inspections by the Engineering Division. The Engineering Division inspects every stormwater BMP that is installed in Town.

Builders/Developers for 9 Royal Street, 15 Parker Street, and 286 Shawsheen Ave, all received enforcement actions from the municipality for violations of their stormwater permit.

## **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: 46

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

As-built plans are required prior to Certificate of Occupancy signoff by the Engineering Division for any project that includes a Stormwater Permit, Site Plan Review, or Conservation Permit.

### **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:

Review of the Town's Zoning Bylaw Section 6.4 (Parking and Site Design) has commenced. Subdivision Regulation amendments that reduce the overall pavement width required for roadways were approved by Planning Board on October 1, 2019 (prior Reporting Year 2). A copy of these regulations are available at:

<https://www.wilmingtonma.gov/planning-conservation/pages/bylaws-regulations-policies>

### **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:

A meeting is scheduled for Tuesday, September 28, 2021 at 9:30 AM with the Director of Planning and Conservation and the Engineering Director to review the Town's Local Comprehensive Stormwater Management Bylaw and Regulations. The current regulations promote LID techniques, infiltration practices, and sustainable stormwater management design.

### **Retrofit Properties Inventory**

Describe the status of the inventory, due in year 4 of the permit term, of permittee-owned properties that could be modified or retrofitted with BMPs to mitigate impervious areas and report on any properties that have been modified or retrofitted:

An initial inventory has been based, in part, on review of the 5-year capital plan for scheduled parking lot repaving projects. Work in Year 4 will include review of the 5 Year capital plan for potential projects at permittee-owned properties for potential reduction of impervious area and implementation of structural BMPs for treating runoff prior to discharge.

## **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:

Catch basins were prioritized for cleaning in FY22 (current reporting year 4). Also, the Town's Engineering Division has been performing routine inspections at the seven (7) large active development projects currently occurring in Town (Sites that disturb more than acre).

### **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: 6

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

Inspection findings were minor, requiring limited action. Engineering Director, and Director of Planning and Conservation met at the Yard Waste Facility in June 2021 to review existing site conditions and potential permitting schedule for proposed BMP at the site.

## 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):

na

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:

na

### 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:

In reporting Year 3, the Town made the following improvements related to the MS4:

1. The Engineering Division performed design, permitting, and DPW constructed stormwater BMPs at Brentwood Avenue. Runoff from approximately 1 acre of impervious area previously discharged untreated runoff directly to BVW. The Engineering Division contracted with a wetland scientist, performed a complete topographic survey, and designed a stormwater system (treatment train) that removes approximately 44% TSS prior to discharge.
2. The Woburn Street school was repaved in late July 2020. After review of the site by the Engineering Division, the Town was able to reduce impervious area by approximately 3,000 SF, and implement a water quality swale to collect runoff from the parking lot.



3. The Town purchased a vacuum street sweeper for \$280,000. The Town was able to sweep all streets twice, and the streets within the Aberjona River Watershed three times.
4. The DPW Parks and Grounds Division purchased a new effecient fertilizer spreader to limit the amount of excess nutrients spread at Town fields and event lawns.

### **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:

The only item impacted by COVID was the annual IDDE Training for DPW employees. Town Operations Manager of the DPW conducts an annual IDDE training course covering topics such as, “what to look for” and “who to contact”, we also review exceptions not considered illicit discharges, permits required for legal sump pump connections, and enforcement/fines. The last training occurred on December 5, 2019 (Reporting Year 2) and included 27 DPW labor and operations personnel. Due to Covid, the Operation's Division of Public Works did not convene for a group training this current reporting year (Year 3). However, with vaccines, and PPEs in place, we plan to continue training this November for Reporting Year 4.

### **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:

The Town will comply with the requirements of 2.3.6; specifically the reports/assessments of existing parking lot and street design regulations, green infrastructure and identify five (5) permittee-owned properties for potential reduction in impervious area and BMPs.

The is also planning on design and permit of tree box filters to collect runoff along Route 62 as part of a culvert replacement project. The Town's Engineering Division plans to collect discharge samples from the existing system in fall of 2021, and test for hydrocarbons, heavy metals, nutrients, and other pollutants. Once these BMPs are installed, we will retest the outfalls and compare to the "existing" baseline condition.

Town has contracted with a local landscaping contractor to continue BMP maintenance and rehabilitation. We anticipate ten (10) BMPs to be rehabilitated in Year 4.

The Town's Stormwater team will continue distribution of educational messages per the SWMP and developing ideas for metering the effectiveness of said messages.

Town will continue catchment investigations as required by the IDDE Program.

## 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:

Paul M. Alunni, PE

Title:

Town Engineer

Signature:

Paul M. Alunni,  
PEDigitally signed by Paul M.  
Alunni, PE  
Date: 2021.09.27 15:39:07 -04'00'

Date:

09/27/21

*[Signatory may be a duly authorized  
representative]*