

Year 6 Annual Report

Massachusetts Small MS4 General Permit

Reporting Period: July 1, 2023-June 30, 2024

Please DO NOT attach any documents to this form. Instead, attach all requested documents to an email when submitting the form. Also ensure any websites included on this form are to publicly accessible sites

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, 2023 and June 30, 2024 unless otherwise requested.

Part I: Contact Information

Name of Municipality or Organization: City of Attleboro

EPA NPDES Permit Number: MAR041087

Primary MS4 Program Manager Contact Information

Name: Nicholas Wyllie

Title: Environmental Planner / Conservation Agent

Street Address Line 1: Attleboro Department of Planning & Development

Street Address Line 2: 77 Park Street

City: Attleboro

State: MA

Zip Code: 02703

Email: conservation@cityofattleboro.us

Phone Number: (508) 223-2222

Stormwater Management Program (SWMP) Information

SWMP Location (publicly available web address): <https://www.cityofattleboro.us/1593/stormwater-management>

Date SWMP was Last Updated: September 2023

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)			
<input checked="" type="checkbox"/> Bacteria/Pathogens	<input type="checkbox"/> Chloride	<input type="checkbox"/> Nitrogen	<input checked="" type="checkbox"/> Phosphorus
<input checked="" type="checkbox"/> Solids/ Oil/ Grease (Hydrocarbons)/ Metals			
TMDL(s)			
In State:	<input type="checkbox"/> Assabet River Phosphorus	<input type="checkbox"/> Bacteria and Pathogen	<input type="checkbox"/> Cape Cod Nitrogen
	<input type="checkbox"/> Charles River Watershed Phosphorus	<input type="checkbox"/> Lake and Pond Phosphorus	
Out of State:	<input checked="" type="checkbox"/> Bacteria/Pathogens	<input checked="" type="checkbox"/> Metals	<input type="checkbox"/> Nitrogen <input checked="" type="checkbox"/> Phosphorus
<input type="button" value="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.

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 publicly available website:

<https://www.cityofattleboro.us/1593/Stormwater-Management>
- ☐ Updated system map due in year 10 with information from completed catchment investigations
- ☒ Provided training to employees involved in IDDE program within the reporting period
- ☒ Properly stored and disposed of catch basin cleanings and street sweepings so they did not discharge to receiving waters
- ☒ All curbed roadways were swept at least once within the reporting period
- ☒ 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 or provide any additional details, please use the box below:

The City is working with a consultant on developing SWPPPs / O&M plans for remaining properties that do not have them.

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
- ☐ This is not applicable because there are no septic systems present

** 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)

Structural BMPs

- ☐ Installed a structural BMP as a demonstration project within the drainage area of the water quality limited water or its tributaries. The type of BMP installed is (e.g. *biofiltration*):

- ☐ 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.

- ☐ No BMPs were installed
- ☐ The above referenced BMP information is attached to the email submission
- ☐ The above referenced BMP information can be found at the following publicly available website:

Total estimated phosphorus removed in **lbs/year** from the installed BMPs:

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:

Structural BMPs have been installed adjacent to the Ten Mile River that include biofiltration and infiltration basins prior to this reporting year. The phosphorus removal for these BMPs has not been tracked yet. The City will work with its stormwater consultant to track the phosphorus removal in upcoming years.

Solids, Oil and Grease (Hydrocarbons), or MetalsAnnual 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

- ☐ The street sweeping schedule is attached to the email submission
- ☐ The street sweeping schedule can be found at the following publicly available website:

- ☐ 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 City's Department of Public Works (DPW) primary method for cleaning catch basins is using a H-16 Catch Basin Cleaner "clam shell" truck. This truck was experiencing excessive free flow movement in the mast arm which created an unsafe situation for the operator. The truck was dropped off at a repair facility in

August 2023. After numerous delays with the repairs, the DPW picked up the truck on September 13, 2024. See attached memo from the Department of Public Works regarding the repair timeline. The loss of this truck during this time frame severely impacted the City's ability to maintain it's catch basins during this reporting period.

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

High traffic streets / high pollutant areas are swept after large storm events. The remaining City streets and parking lots are swept at least once a year.

The City is currently working on a grant funded Green Stormwater Infrastructure (GSI) Feasibility Study project for major roadways leading into the downtown where the drainage system discharges into the Ten Mile River. The goal of this project is to retrofit the existing stormwater management system for these roadways with more GSI.

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:

10 Mile River segment MA52-03 now has an impairment for water chestnut and Sevenmile River segment MA52-08 now includes an impairment for benthic macroinvertebrates.

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: 9

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:[Pet Waste Flier]

Message Description and Distribution Method:

Distributed to pet owners upon renewal or issuance of a dog license a flier describing the dangers of improper disposal of pet waste. Flier also described how to properly dispose of pet waste.

Targeted Audience: Residents

Responsible Department/Parties: Planning Department / City Clerk

Measurable Goal(s):

Distribute fliers with every dog license issued / renewed.

Message Date(s): Distributed with each dog license issued by City Clerk (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:

BMP:[Septic System Flier]

Message Description and Distribution Method:

Flier that explains proper septic system care for residents.

Targeted Audience: Residents

Responsible Department/Parties: Planning Department / Health Department

Measurable Goal(s):

Distribute with each septic system permit / inspection.

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:

Flier is distributed with septic system permits and posted to City website rather than mass mailing to save money.

BMP:[Construction Erosion Control Flier]

Message Description and Distribution Method:

Flier that describes proper erosion control during construction.

Targeted Audience: Developers (construction)

Responsible Department/Parties: Planning Department / Building Department

Measurable Goal(s):

Distribute with building permits when issued.

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:

BMP:[Social Media Posts - Proper Disposal of Yard Waste]

Message Description and Distribution Method:

Posted an informational graphic to social media that informed residents about the proper disposal of yard waste (leaf litter and grass clipping) and provided a link to additional resources where they can learn more.

Targeted Audience: Residents

Responsible Department/Parties: Planning Department

Measurable Goal(s):

Post messages seasonally to educate the public.

Message Date(s): October 30, 2023, April 29, 2024 and May 30, 2024

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:

Social media posts are cheaper and allow for more community engagement compared to newspaper articles.

BMP:[Proper Disposal of Trash Flier]

Message Description and Distribution Method:

Flier that educates business owners about the proper disposal of trash on their properties.

Targeted Audience: Businesses, institutions and commercial facilities

Responsible Department/Parties: Planning Department

Measurable Goal(s):

Mail flier to each business in industrial zones and dense commercial areas.

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:

BMP:[Education about use of fertilizer]

Message Description and Distribution Method:

Social media post regarding the harm fertilizers can have on water resources.

Targeted Audience: Residents

Responsible Department/Parties: Planning Department

Measurable Goal(s):

Message Date(s): May 30, 2024

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:

This message was not listed in the NOI. Algae blooms are common during the summer within ponds on the Ten Mile River. This message was included to educate residents about sources of algae blooms.

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 SWMP is posted on the City's website with a web page dedicated to it. The public is encouraged to comment on the SWMP and contact information for the City's MS4 program manager is provided.

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 City hosts an annual clean-up of the Ten Mile River in September. Residents pull out trash and debris that may pollute the river.

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: 2

Number of SSOs removed: 2

MS4 System Mapping

Percent of Phase II map complete: 25

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 above referenced outfall screening data is attached to the email submission
- ☐ The above referenced outfall screening data can be found at the following publicly available website:

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

Number of outfalls screened: 0

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

Percent of outfalls screened: 100

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

Dry-weather outfall screening has been completed.

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 publicly available website:

<https://www.cityofattleboro.us/1593/Stormwater-Management>

Below, report on the number of catchment investigations completed during this reporting period.

Number of catchment investigations completed this reporting period: 32

Below, report on the percent of catchments investigated to date.

Percent of total catchments investigated: 11.65

Optional: Provide any additional information for clarity regarding the catchment investigations below:

The City is under contract with a consultant to perform additional catchment investigations during this fiscal year. 3 catchments were determined to not be SW catchments. New catchment total is 395. 100% of problem catchment investigations were completed by June 30th, 2024.

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 publicly available website:

<https://www.cityofattleboro.us/1593/Stormwater-Management>

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: 2

Number of illicit discharges removed: 2

Estimated volume of sewage removed: 350 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: 7

Total number of illicit discharges removed: 6

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

Employee Training

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

Consultants from Horsley Witten Group provided IDDE training to DPW and Planning Department staff on March 27, 2024.

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: 11

Number of inspections completed: 19

Number of enforcement actions taken: 3

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

MCM5: Post-Construction Stormwater Management in New Development and Redevelopment**Ordinance or Regulatory Mechanism**

Date update was completed (due in year 3): Stormwater Ordinance updated 4/18/23.
Stormwater regulations are currently being updated.

Website of ordinance or regulatory mechanism: <https://www.cityofattleboro.us/377/Conservation-Commission>

As-built Drawings

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

Number of as-built drawings received: 6

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

Street Design and Parking Lots Report

Below, describe any changes made or planned to be made to local regulations and guidelines based on the report completed in Year 4:

Stormwater Management Ordinance Rules and Regulations currently have an open public hearing before the Conservation Commission. Once the comment period has passed, the Commission is expected to approve the proposed amendments.

Planning Department staff will be proposing amendments to the subdivision rules and regulations to the Planning Board after the proposed amendments to the Stormwater Ordinance Regulations are approved by the Conservation Commission.

Green Infrastructure Report

Below, describe progress towards making green infrastructure practices allowable based on the report completed in Year 4:

Stormwater Management Ordinance Rules and Regulations currently have an open public hearing before the Conservation Commission. Once the comment period has passed, the Commission is expected to approve the proposed amendments.

Planning Department staff will be proposing amendments to the subdivision rules and regulations to the Planning Board after the proposed amendments to the Stormwater Ordinance Regulations are approved by the Conservation Commission.

Retrofit Properties Inventory

Below, list remaining permittee-owned properties that could be modified or retrofitted with BMPs to mitigate impervious areas (must maintain a minimum of 5 sites in inventory until less than 5 sites remain):

1. Government Center (77 Park Street):
2. Briggs Playground (36 East Street)
3. James St Parking (0 James Street)
4. Attleboro Fire Department HQ (100 Union Street)
5. Bartek Recreation Center (81 Pine Street)

Additional retrofit opportunities are listed in the Phosphorus Source Identification Report.

Below, list all properties that have been modified or retrofitted with BMPs to mitigate impervious area that were inventoried as part of 2.3.6.d of the permit and the type of BMP(s) implemented. Non-MS4 owned properties that have been modified or retrofitted with BMPs to mitigate impervious area may also be listed, but must be indicated as non-MS4.

The City is continuing its work with an engineering consultant to redesign the Government Center parking lot. Three preliminary designs have been presented to municipal staff during the reporting period. Planning Department staff are gathering feedback from various City departments to narrow down the designs.

The Attleboro Water Department facility at 1296 West Street and the new Attleboro High School at 100 Rathbun Willard Drive have both received BMP retrofits/upgrades. BMPs included vegetated infiltration basins.

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: 24

Number of catch basins cleaned: 24

Total volume or mass of material removed from all catch basins: 39 cubic yards

Below, report on the total number of catch basins in the MS4 system.

Total number of catch basins: 5,000

If applicable:

Report on the actions taken if a catch basin sump is more than 50% full during two consecutive routine inspections/cleaning events:

Street Sweeping

*Report on street sweeping completed **during this reporting period** using one of the three metrics below.*

☒ Number of miles cleaned: 425

☐ Volume of material removed: [Select Units]

☐ Weight of material removed: [Select Units]

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: 2

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

Additional Information

Monitoring or Study Results

Results from any other stormwater or receiving water quality monitoring or studies conducted during the reporting period not otherwise mentioned above, where the data is being used to inform permit compliance or permit effectiveness must be attached.

- ☒ Not applicable
- ☐ The results from additional reports or studies are attached to the email submission
- ☐ The results from additional reports or studies can be found at the following publicly available 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

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 City is currently working with a consultant on a Green Stormwater Infrastructure (GSI) Feasibility Study for major roadways leading into the downtown. Many of these roadways have "grey" stormwater infrastructure that discharge into the Ten Mile River or its tributaries. The goal of this project is to find locations along these roadways where GSI can be implemented to improve water quality and reduce flooding. This study will be completed by Spring 2025. The City will then apply for construction grants to install the GSI in feasible locations.

Year 7

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 7 requirements summarized below. (Note: impaired waters and TMDL requirements are not listed below)

Yes, I agree ☒

Part V: Certification of Small MS4 Annual Report 2024

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:

Cathleen DeSimone

Title: Mayor

Signature:



Date: 09/30/24

[Signatory may be a duly authorized representative]