

# 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:

EPA NPDES Permit Number:

#### Primary MS4 Program Manager Contact Information

Name:

Title:

Street Address Line 1:

Street Address Line 2:

City:

State:

Zip Code:

Email:

Phone Number:

#### Stormwater Management Program (SWMP) Information

SWMP Location (publicly available web address):

Date SWMP was Last Updated:

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

## Part II: Self-Assessment

First, in the box below, select the impairment(s) and/or TMDL(s) that are applicable to your MS4. 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.

### 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:

- ☒ 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:

Excess brush and woody material was cut and removed at two structural BMPs located at 19 Old Farm Road and 63 Old Farm Road during Permit Year 7.

### **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: 25.28

*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:

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

Included as an appendix in the SWMP Plan, available for download at: <https://douglas-ma.gov/512/MS4-Stormwater>

- ☒ 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:

Street Sweeping - All streets were swept twice a year within the MS4 area.

Increased Sweeping for High Pollutant Loads - this was determined not to be necessary for the Town as these areas are not observed to accumulate more sediment and debris than other areas within the Town. As noted above, all streets within the MS4 area are swept twice a year.

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

### 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:

The Town has determined it is subject to the following additional TMDL and Impaired Waters requirements:  
- Mumford River (MA51-14), metals water quality impairments requirements (Appendix H, Part V)

Under the Environmental Protection Agency's (EPA's) 2016 National Pollutant Discharge and Elimination System (NPDES) Municipal Separate Storm Sewer System (MS4) Permit for Massachusetts, communities located within the watershed of a nitrogen-impaired waterbody with an approved out of state Total Maximum Daily Load (TMDL) must meet the requirements outlined under Appendix F, Part B.I of the permit. Douglas is located within the Long Island Sound watershed, a waterbody with an approved TMDL for nitrogen and thus must meet these requirements. However, requirements only apply to areas of town that are both classified as an urbanized area with formalized drainage infrastructure and located within the watershed. Upon review, only a small portion of the town is located within the Long Island Sound watershed, the southwest corner of town that discharges to the Quinebaug River. Within this area only a very small portion is classified as a regulated urbanized area, the small area on the western side of High Street along the border with Webster, Massachusetts and Thompson, Connecticut. There is no drainage infrastructure along High Street; rather, all stormwater flows off of the roadway via country drainage onto the side of the road. As there is no regulated drainage infrastructure within the UA, the Town of Douglas does not have to meet Long Island Sound nitrogen TMDL requirements. However, the Town has voluntarily decided to implement select items, including the public education, stormwater management in new and redevelopment, and good housekeeping and pollution prevention requirements as outlined further in its Stormwater Management Program (SWMP) Plan. The Town will not complete a Nitrogen Source Identification Report or implement structural BMPs within the Long Island Sound watershed.

The above changes have been reflected in the Town's SWMP Plan.

## 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 Website**

Message Description and Distribution Method:

The following seasonal flyers are posted for download on the Town's stormwater website:

- Public education news articles – fertilizer
- Spring fertilizer and lawn care message
- MS4 leaf litter flyer
- Greenscapes lawn care

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

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: Information Flyers**

Message Description and Distribution Method:

The following seasonal flyers were printed and made available at the Board of Health, Douglas Public Library, the Douglas Highway Department, and Community Development Office:

- Public education news articles – fertilizer
- Spring fertilizer and lawn care message
- MS4 leaf litter flyer
- Greenscapes lawn care

Targeted Audience:

Responsible Department/Parties: Residents, Businesses, institutions and commercial

Measurable Goal(s):

Provide various seasonal information flyers available at several publicly accessible places.

Message Date(s): Spring, Summer, Fall

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:**

SWMP Plan for Download - The Town has posted the SWMP Plan and other relevant information on Town website along with contact information to allow for public comment.

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:**

As part of the Town's ongoing efforts to pass the required stormwater regulations that have been previously rejected by voters at Town Meeting, Douglas had several public meetings to discuss the latest draft Stormwater bylaw in an effort to solicit support from town boards and members of the public. Outreach during Year 6 included public meetings with the Board of Selectmen, Conservation Commission, Planning Board, and Finance Committee. Several citizens participated in the discussion.

## 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**

Percent of Phase II map complete:

*Optional: Provide additional status information regarding your map:*

All known outfalls, stormwater BMPs, and receiving waterbodies with impairments have been mapped to date. Initial catchment delineations have also been completed based on topographic mapping and available stormwater system information, and are being refined as additional field information is collected during catchment investigations. The Town has also substantially mapped catch basins and manholes, and is working to complete mapping of piping connectivity. Mapping of open channel conveyances and interconnections with other MS4s (e.g. DOT) is ongoing, and it is expected that this will continue as part of DOT's own mapping efforts to be completed under a future TS4 permit. The Town is also working to identify data gaps in its drainage mapping (e.g., catch basins without piping, disconnected drainage networks, etc.) and is actively mapping and investigating these. Any new infrastructure discovered through this process will be mapped and screened as necessary by the end of Year 10.

### **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:

*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 publicly available 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 publicly available website:

*Below, report on the number of illicit discharges identified and removed, along with the volume of sewage removed **during this reporting period.***

Number of illicit discharges identified:

Number of illicit discharges removed:

Estimated volume of sewage removed:  gallons/day

*Below, report on the total number of illicit discharges identified and removed to date. At a minimum, report on the number of illicit discharges identified and removed **since the effective date of the permit (July 1, 2018).***

Total number of illicit discharges identified:

Total number of illicit discharges removed:

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

### **Employee Training**

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

An on-site IDDE training session was held on March 20, 2024 with applicable DPW staff. This session also provided training on Stormwater Pollution Prevention Plan (SWPPP) implementation and inspections at the DPW Garage and Transfer Station.

### **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: 4

Number of inspections completed: 35

Number of enforcement actions taken: 1

*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):

Bylaws: Adopted January 1, 1974. Amended May

Regulations:

Website of ordinance or regulatory mechanism:

Bylaws: Article 11, <https://douglas-ma.gov/DocumentCenter/View/3642/GENERAL-BYLAWS->

Regulations:
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**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:

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**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:

No changes have been made to date. To be determined pending update of Regulations and Bylaws. It is estimated the Subdivision Regulations will be updated by June 2024, Zoning Bylaws by December 2026, and General Bylaws by December 2028.
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**Green Infrastructure Report**

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

No changes have been made to date. To be determined pending update of Regulations and Bylaws. It is estimated the Subdivision Regulations will be updated by June 2024, Zoning Bylaws by December 2026, and General Bylaws by December 2028.
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**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):

Douglas Elementary School - Recommend the installation of two small infiltration basins on either end of the site. The basin along School Court (potentially behind the building on parcel Map T2) would connect to new catch basins constructed along the roadway to capture the sheet flow that is currently leaving the site to the northwest without passing through any drainage infrastructure. The basin on the east of the site would interconnect with the existing catch basins and concrete conveyance that runs parallel to the driveway entrance off of Davis Street. Both basins would capture runoff from adjacent parking areas.
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Douglas High School - Recommend to rehabilitate and retrofit the existing infiltration/detention BMP observed near the entrance driveway off of Davis Street. Ensure that all outlet structures draining to the BMP are fully functional and operational. Add additional catch basins and outfalls into the BMP along the steep driveway, if capture capacity of existing catch basins is inadequate. Recommend retrofitting existing BMP with treatment forebay, if one does not exist/is not functional

Douglas VFW Field - Recommend the installation of catch basins and/or trench drain that discharges to a treatment swale that runs parallel to the paved parking area. Also recommend to assess the Centerville Brook Culvert for structural integrity, as construction may be necessary to repair damage/ensure connectivity between the parking lot and Main Street.

Douglas Water Department - Recommend the installation of a constructed wetland at a low point near the rear of the paved portion of the site. The observed drainage infrastructure could be retrofitted to outfall to the constructed wetland, as it appears both overland flow and stormwater infrastructure are draining roughly towards this point. Install an oil/water separator upstream of wetland inlet.

Douglas Town Hall - Limited space is available at the site, however there is an area near the rear of the parcel within the landscaped lawn for a small infiltration basin. Recommend re-routing existing outfalls to discharge to an infiltration basin that also accommodates runoff contained within the sheet flow bypass ponding spot (also in the rear). This ponding spot could be the site of a new catch basin that discharges to the basin, or could be regraded to overland drain to the basin.

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.

No properties have been modified or retrofitted with BMPs to date.

## 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:

### **Street Sweeping**

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

☒ Number of miles cleaned: 25.54

☐ Volume of material removed: 51.1875 cubic yards

☐ 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: 4

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

Not applicable, no corrective actions have been taken to date.

4 quarterly inspections were completed at the Highway Department and Transfer Station Facilities for 8 inspections total. Inspections were conducted on July 10 and October 10, 2023, and January 2 and April 9, 2024.

## **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**

*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.

**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 ☒

- Complete investigations of catchments associated with Problem Outfalls
- Complete investigations of catchments where any information gathered on the outfall/interconnection identifies sewer input

**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)
- Identify additional permittee-owned properties that could potentially be modified or retrofitted with BMPs to reduce impervious areas so that the permittee maintains a minimum of 5 sites in their inventory, until such a time when the permittee has less than 5 sites remaining

Provide any additional details on activities planned for permit year 7 below:

## Part V: Certification of Small MS4 Annual Report 2023

### 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.

Name:

MATTHEW J. WOJCIK

Title:

Town Administrator

Signature:

*Matthew Wojcik*  
[Signatory may be a duly authorized representative]

Date:

9/27/2024

*Note: When prompted during signing, save the document under a new file name.*

### Annual Report Submission

Please submit the form electronically via email to both EPA and MassDEP by clicking on one of the links below or using the email addresses listed below. Please ensure that all required attachments are included in the email and not attached to this PDF.

EPA: [stormwater.reports@epa.gov](mailto:stormwater.reports@epa.gov)

Mass[Stormwater.DEP@mass.gov](mailto:Stormwater.DEP@mass.gov)

### Paper Signature:

If you did not sign electronically above, you can print the signature page by clicking the button below.

Print Signature Page

Optional: If you did not sign electronically above, you may lock the form by clicking the "Lock Form" button below which will prompt you to save the locked version of the form. Save this locked version under a new file name.

Lock Form