

Year 7 Annual Report

Massachusetts Small MS4 General Permit

Reporting Period: July 1, 2024-June 30, 2025

****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, 2024 and June 30, 2025 unless otherwise requested.

Part I: Contact Information

Name of Municipality or Organization: Town of Hudson

EPA NPDES Permit Number: MAR041198

Primary MS4 Program Manager Contact Information

Name: Eric Ryder

Title: Director - Department of Public works.

Street Address Line 1: 1 Municipal Drive

Street Address Line 2:

City: Hudson

State: MA

Zip Code: 01749

Email: eryder@townofhudson.org

Phone Number: 978-568-9612

Stormwater Management Program (SWMP) Information

SWMP Location (publicly available web address): <https://www.townofhudson.org/363/Stormwater-Management-Program-SWMP>

Date SWMP was Last Updated: 9/28/2023

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

The SWMP is also physically available at 1 Municipal Drive, Hudson, MA. 01749.

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

Year 7 Requirements

- ☒ Completed catchment investigations associated with Problem Outfalls
- ☐ Completed catchment investigations where information gathered on the outfall/interconnection indicated sewer input

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:

In PY7, The Town of Hudson is contracted with Woodard & Curran (W&C) for a BMP inventory, mapping and inspections. We developed an inventory of known SCMs and Open Channel Conveyances in Town along with identifying ownership of these structures. This work is 70% completed in PY7. The O&M Program will be revised based on W&C's findings. We anticipate new GIS shapefiles for the new SCMs, and updated shapefiles for catch basins, outfalls and culverts.

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 F and H 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:

The Board of Health has an informational flyer on septic systems. They present the information to residents upon request, their flyer is also posted on their webpage at: <https://www.townofhudson.org/DocumentCenter/View/465/Septic-System-Maintenance-PDF>

Our IDDE program plan, which includes septic tank maintenance and pollution prevention was sent to the Health department for review.

The Town of Hudson developed a system within our online permitting portal. Any dog owner obtaining a license (new or renewal) is required to acknowledge reading an educational flyer re: dog waste collection, when they receive dog licensing.

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*):

Bioretention Basin

- ☐ 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: 5.11

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

In PY7, a bioretention basin was constructed near the Assabet River at 1 Municipal Drive. The site work was completed prior to June 2025 for a new Department of Public Works (DPW) facility. This is an improvement of the site. Prior site conditions of this location had school buses parked on a gravel area without any stormwater treatment structures. Attached is the calculation and report for the TMDL Phosphorus - file named "DetBasin- TMDL Phosphorus Calcs".

Lake and Pond Phosphorus TMDL

Below, calculate your current phosphorus export rate by first filling out the individual phosphorus loading components (labeled [A], [B], [C], and [D]) and then computing your current phosphorus export rate using the equation provided.

Baseline phosphorus export rate from LPCP Area (lbs/year) [A]:

Total phosphorus reduction from all nonstructural controls this reporting period (lbs/year) [B]:

Total phosphorus reduction from all structural controls installed this reporting period and all previous years (lbs/year) [C]:

Phosphorus load increase due to development incurred since baseline loading was calculated in lbs/year [D]:

Current phosphorus export rate from the LPCP Area in lbs/year [=A-(B+C)+D from above]:

I certify under penalty of law that all source control and treatment Best Management Practices being claimed for phosphorus reduction credit have been inspected, maintained and repaired in accordance
☐ with manufacturer or design specification. I certify that, to the best of my knowledge, all Best Management Practices being claimed for a phosphorus reduction credit are performing as originally designed.

☐ All municipally owned and maintained turf grass areas are being managed in accordance with Massachusetts Regulation 331 CMR 31.00 pertaining to proper use of fertilizers on turf grasses

☐ Implemented all nonstructural control measures **during this reporting period** and documented the measures and their phosphorus reduction. The nonstructural control measure information:

☐ is attached to the email submission

☐ can be found at the following publicly available website:

☐ Documented the structural control measures implemented during **this reporting period and all previous years**, including location, phosphorus reduction in weight/year, and date of last completed maintenance and inspection for each control. The structural control measure information:

☐ is not applicable; no structural control measures were implemented

☐ is attached to the email submission

☐ can be found at the following publicly available website:

The LPCP: (select one of the following options. If you submitted your LPCP in a prior year and have an updated website, please include the website below)

☐ was submitted with a prior annual report

☐ is attached to the email submission

☐ can be found at the following publicly available 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:

Town of Hudson contracted with Woodard and Curran to begin an inventory and mapping update of existing structural BMPs. The field work for this contract finished in Summer of 2025. We are expecting the GIS shapefiles and a final SCM / BMP report in PY8. This report would include preliminary cost analysis for the top 5 SCM's that are in need of maintenance. The 2025 / 2026 report and the BMP inventory and mapping will aid in preparation of contracts for maintenance / repair work on the SCMs.

Note that the Fort Meadow Reservoir is located within Hudson and Marlborough. The reservoir mostly abuts and is located within Marlborough City limits.

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

Fort Meadow Reservoir is a Category 5 waterbody according to the 2022 Integrated List of Waters. One of the impairments to Fort Meadow Reservoir is total phosphorous, triggering the requirement of a LPCP. Fort Meadow Reservoir is located within Marlborough and Hudson. Most of the reservoir is located in Marlborough. An intermunicipal agreement may need to be drafted and agreed upon to address current stormwater infrastructure treatment practices. Both communities committing to proportional areas of the lake within their city / town limits will make the program more equitable for cost sharing and scheduling treatments.

To date, the Town of Hudson has approved a stormwater utility fee, and passed the local Stormwater Rules and Regulations. Public education via social media, brochures and Utility bill mailers are sent to all residents informing about prevention of stormwater pollution and the local regulations.

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:

Impairments were changed from the revised 303(d) list. In accordance with the MS4 Permit, the SWMP was updated in September 2023, to include these impairments.

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: 7

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:General Education and Outreach

Message Description and Distribution Method:

The Stormwater Division created flyers and posted them on the website for Commercial properties, industrial sites and residential audiences along with a specific flyer for pet waste. Flyers / Brochures are also displayed to the public at our office reception counter.

Targeted Audience: General

Responsible Department/Parties: DPW

Measurable Goal(s):

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:

BMP:Phone calls and emails

Message Description and Distribution Method:

As part of the issuance of the Stormwater Utility Fee in the November 2023, there are 5-10 phone calls / quarter, and multiple emails about the fee. There were also people coming into the DPW office to discuss their bill. All inquiries were answered with educational messaging about water quality, stormwater infrastructure, and the MS4 Permit.

Targeted Audience: General

Responsible Department/Parties: DPW

Measurable Goal(s):

Direct conversations with various types of property owners. Where necessary, conduct site visits to properties

- to explain stormwater and how the quantity and quality impacts the town and the drain infrastructure.

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:

This was an additional effort by the Town to further explain why a stormwater utility was necessary.

BMP:Consumer Confidence Report

Message Description and Distribution Method:

The 2024 Consumer Confidence Report contained a graphic explaining the difference between stormwater and sewer utilities. It also explained how to help improve water quality by taking simple actions at home, or picking up after your pet. The graphic was posted to the stormwater page (townofhudson.org/stormwater) in PY7.

Targeted Audience: All

Responsible Department/Parties: DPW

Measurable Goal(s):

A postcard with a link to the Consumer Confidence Report was mailed to commercial and residential property owners. The report is also posted on the Town's website:

<https://www.townofhudson.org/ArchiveCenter/ViewFile/Item/241>

Note, this link will likely expire with next year's Consumer Confidence Report.

Message Date(s): June 2025

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 was an additional effort made by the Stormwater Division to reach as many people as possible.

BMP:Back of Utility Bill

Message Description and Distribution Method:

Utility bills are sent out in February, May, August and November every year. Stormwater messaging relevant to the season is included on the back of the bill. It also included a call to action to visit our stormwater website.

Targeted Audience: All

Responsible Department/Parties: DPW

Measurable Goal(s):

Roughly 6,000 stormwater bills were distributed to landowners that have more than 500 square feet of impervious areas on their properties.

Message Date(s): August 2024, November 2024, February 2025 and May 2025

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**Message Description and Distribution Method:**

Monthly stormwater pollution prevention messages are posted on the town's facebook account. Messages and images are relevant to the season and various targeted audiences.

Targeted Audience: All

Responsible Department/Parties: DPW

Measurable Goal(s):

There are about 2500 followers for the Hudson DPW postings and this number increases every year.

Message Date(s): Every month- mid month.

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 is an additional effort to reach Hudson's residential, commercial and industrial audiences through social media.

BMP:Permits and applications**Message Description and Distribution Method:**

All contractors that apply for Site plan review and Open space residential developments are presented the Construction flyer describing Low impact development measures and erosion control techniques- Flyer: <https://www.townofhudson.org/DocumentCenter/View/593/Developers-Brochure-PDF>

All Dog license (new and renewals) are presented a pet waste brochure that the applicant acknowledges as read and reviewed. Brochure link: <https://www.townofhudson.org/DocumentCenter/View/606/How-to->

Properly-Dispose-off-Pet-Waste-and-Important-Facts-on-Pollutants-PDF

Targeted Audience: All

Responsible Department/Parties: Planning Dept and Town Clerk

Measurable Goal(s):

In the PY 7 we had 6 Site plan reviews, 1 Open Space Residential development and 1972 dog license applications.

Message Date(s): Date of permit application submittal

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 is an additional effort to reach targeted audience re: stormwater pollution prevention.

BMP: Website Improvements

Message Description and Distribution Method:

The Town of Hudson website was migrated to a new platform in Spring of 2025. The Stormwater Division updated the stormwater website and the education and outreach subpage in PY7.

Education and Outreach information, is clearly categorized for every targeted audience with links to flyers developed and edited by the Stormwater Division. In addition, there are several attachments within the subpage. Other subpages on the Stormwater website consist of:

- Annual Reports
- Massachusetts Stormwater Handbook
- Report a Stormwater or Flooding Issue
- SWMP
- Stormwater Rules and Regulations
- Stormwater Utility
- Stormwater Utility Fees

Targeted Audience: All

Responsible Department/Parties: DPW Stormwater

Measurable Goal(s):

All enquiries re: the stormwater utility fee and / or stormwater infrastructure maintenance are directed to the town website. All social media postings also direct audiences to visit the stormwater webpage/(s). The number of visitors for the old webpage and new webpages are harder to compute this year, but we expect to provide a quantifiable number of visitors in PY8.

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:

Enhanced public messaging as part of desired education and outreach efforts from the Town.

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 draft IDDE program and plan was updated and posted on the town's stormwater webpage. Town of Hudson contracted Woodard and Curran to conduct investigations on problem outfalls and notifications and communications to specific properties were sent out as part of the field work in that project. These notices reiterated the importance of stormwater pollution prevention. Letters and Door hanger templates are attached. File names: "Notification-Dye Test Letter (initial)" and "Notification-Hudson Door Hanger (secondary)".

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 full time -Stormwater Manager left the position in October 2024 and the town is still in the process of filling the position. Currently we have an interim part time employee in this position. We anticipate reporting progress in this MCM in PY 8 / 9.

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:

Outfalls, Drain Manholes, Drain pipes, Culverts, catch basins and initial catchment delineations have been mapped. Outfalls contain a unique identifier, a global ID, and some other relevant data.

The town has contracted with Woodard and Curran to update the Culverts, Outfalls, Catch basins as well as create an SCMs / BMPs layer and an open channel conveyance layer as they conduct the field survey. The field work was completed prior to July 2025, however the mapping updates are pending.

Note: the Town does not have any combined sewer systems or interconnections. Therefore, these are not applicable to Hudson's Stormwater Management Program. We anticipate that 80% of our stormwater infrastructure is mapped, and the remaining piece of Phase II Mapping is to refine catchments.

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:

There were some high priority and problem outfalls field investigated, sampled and reports reviewed by the Town's consultant (Woodard and Curran) and sub consultant (SDE). However as of date, the consultant has not submitted the findings to the Town.

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: 0

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

Field work for catchment investigations from the problem and high priority and problem outfalls were conducted. However, as of date, the Town is yet to receive the final report with the analysis, mapping, and recommended next steps.

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: 1

Number of illicit discharges removed: 1

Estimated volume of sewage removed: 100 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: 7

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

During the time period July 2024 to June 2025- Hudson had an SSO South of Lee Circle within a sewer easement and there were no waste water discharges into any natural water bodies. This was notified to DEP immediately. The sewer main break within the easement was fixed within a matter of hours. Attached filename: "2025-09-16_SSO Inventory PY7". Besides the SSO mentioned above, there have been 2 complaints received by this office re: illicit discharges. One was an outfall at the entrance to Juniper Road re: suds. Upstream DPW staff investigations of the Drain network was conducted and we noted suds in one of the manholes- however, sampling reports indicated no illicit substances. Second was an olfactory complaint at Princeton road. A detailed report is attached to this submission- file titled "IDDE report - Princeton rd - Aug 2024". Both of these investigations, resulted in a determination that there was no illicit discharge.

Employee Training

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

Due to limited resources in the stormwater division, no employee training was conducted in this reporting period. However, a detailed SWPPP, and good house keeping training was conducted in April of 2024. Most of the employees that attended the training still work for Hudson DPW.

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: 7

Number of inspections completed: 106

Number of enforcement actions taken: 0

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

In Permit Year 7, the Stormwater Manager and/or an engineering inspector- inspected active construction sites. Planning department and Building department permit applicants who have any excavation for their projects are required to fill out a land disturbance form. This form lists all seven triggers below:

- i. Total land disturbance of one acre or more.
- ii. Total land disturbance less than one acre if the disturbance is part of larger common plan of development or sale that would disturb one or more acres.
- iii. Any project that discharges to the Town's separate storm and sewer system.
- iv. Any project meeting the applicability section of the latest version of the Massachusetts Stormwater Management Handbook.
- v. Any land disturbance greater 10,000 square feet or greater than 50% of the parcel or lot, whichever is less.
- vi. Any activity that will increase impervious surface area by more than 50%.
- vii. Land disturbance on a 10% slope or greater.

The review can fall under a major or minor review category, depending on the responses in the land disturbance form.

For inspections, a total of 53 applications required inspections. On average 2 inspections are conducted per application depending on the progress of work. The inspection step within the permit application workflow is only closed at the end of the project.

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: 11

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

There are 11 as-builts provided since Feb 2025 - to-date. There may be more recorded by the previous employee. For a full building construction, DPW stormwater does not sign off until an as-built pdf is provided to scale. This is a requirement per the Hudson's stormwater rules and regulations.

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:

The stormwater rules and regulations were finalized and adopted in October 2023. No edits to this document were made in PY 7. However, in October 2023 Stormwater manager met with the planning department director and conservation agent, to review and local policies that effect street and parking lot designs. We agreed to use the resources developed by the nonprofit 'Center for watershed protection' (CWP). CWP created and Code and Ordinance worksheet which allows to score our codes based on various categories. In September 2024, this worksheet was customized for Hudson with the help of the multiple divisions involved in plan reviews. Attached File: "Appendix A- COW Scoring spreadsheet"

Green Infrastructure Report

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

In September 2024, A Low impact development and Green infrastructure report- Policy review was drafted by the stormwater manager. Attached is the Code and Policy review file "2024-09-30_Code and Policy Review" - This file refers to the Appendix for street design and parking lots mentioned above. Staff changes occurred during late fall of 2024. Green infrastructure is encouraged in the town's subdivision rules and regulations, and plan reviews by multiple departments and review comments encourage green infrastructure in design stages.

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):

Due to reduced staff and resources- Town of Hudson contracted with Woodard and Curran to review and prepare an inventory and GIS layer file of all Town owned SCM's and identify the top 5 SCM's to be retrofitted. A draft report was prepared including preliminary cost analysis of the top 5 SCM retrofits / rehabilitation and or repairs. The report is expected to be finalized in PY8.

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.

A new DPW facility was constructed at 1 Municipal Drive. The new construction contains a bioretention basin, and a subsurface infiltration system. It is worth noting that area of construction was gravel and was a staging area for public school buses prior to construction. The area before had no stormwater infrastructure.

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: 2,847

Number of catch basins cleaned: 2,600

Total volume or mass of material removed from all catch basins: 520 tons

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

Total number of catch basins: 2,823

If applicable:

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

Note: There are over 3,000 catch basins in the Town. The above count excluded Catch basins (CBs) that are private (non-MS4 basins), and basins in non urbanized areas.

In Fall of 2024 about 50% of the town's CB's (North of Main street and some low lying areas in the Southern part of Hudson) were cleaned and inspected. The data export needs to be reviewed. This work is pending due to staff and resource shortages.

In spring of 2025 the remaining 50% of the town's CBs were contracted out for inspections and cleaning (South of Main street and some low lying areas in the northern part of Hudson), a small percentage of CBs could not be cleaned either due to repairs or insufficient space for the clam shell. Town of Hudson intends to track all CBs within the GIS layer and either conduct repairs in-house or contract out repairs on catch basins.

Note: To-date about 320 Tons of catch basin material have been disposed- the remainder are stockpiled in a protected manner and intended to be disposed late fall of 2025.

Street Sweeping

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

- ☒ Number of miles cleaned: 182
- ☐ 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: 0

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

Due to the shortage of staff and resources in the stormwater division, No SWPPP inspections were conducted in PY7. We expect training and swppp for town owned facilities in PY8.

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.

Year 8

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

Yes, I agree ☒

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 8 below:

We anticipate that the town's contractor Woodard and Curran will provide the deliverables which include new SCM and OCC (Open channel conveyances) mapping, and updated Drain layers.

Once delivered, Catch basin layer needs to be updated with records from both the cleaning contracts.

SCM retrofits for the top 5 basins will be reviewed internally for capital improvement projects / town funded projects.

We hope to employ a full time stormwater manager to be able to ensure gaps identified in this report. It may take a few years- but with the system in-place and the progress done so far with online permitting and stormwater utility, we expect that Town of Hudson will be on-track.

Part V: Certification of Small MS4 Annual Report 2025

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:

Eric Ryder

Title:

DPW Director

Signature:



Date:

9/16/25

[Signatory may be a duly authorized representative]

