

Year 2 Annual Report
Massachusetts Small MS4 General Permit
New Permittees
Reporting Period: July 1, 2019-June 30, 2020

Please DO NOT attach any documents to this form. Instead, attach all requested documents to an email when submitting the form

Unless otherwise noted, all fields are required to be filled out. If a field is left blank, it will be assumed the requirement or task has not been completed. Please ONLY report on activities between July 1, 2019 and June 30, 2020 unless otherwise requested.

Part I: Contact Information

Name of Municipality or Organization: Town of Dunstable

EPA NPDES Permit Number: MAR041242

Primary MS4 Program Manager Contact Information

Name: Brian M. Palaia

Title: Town Administrator

Street Address Line 1: 511 Main Street

Street Address Line 2:

City: Dunstable

State: MA

Zip Code: 01827

Email: bpalaia@dunstable-ma.gov

Phone Number: (978) 649-4514

Stormwater Management Program (SWMP) Information

SWMP Location (web address): https://www.dunstable-ma.gov/sites/g/files/vyhlf4361/f/uploads/stormwater_management_plan_2019.pdf

Date SWMP was Last Updated: July 2019

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

Part II: Self-Assessment

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
- ☒ Properly stored and disposed of catch basin cleanings and street sweepings so they did not discharge to receiving waters

Optional: If you would like to describe progress made on any incomplete requirements listed above, provide any additional information for your self-assessment, and/or if any of the above year 2 requirements could not be completed due to the impacts of COVID-19, please identify the requirement that could not be completed, any actions taken to attempt to complete the requirement, and reason the requirement could not be completed below:

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? 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>

☐ Yes

☒ No

If yes, describe below, including any relevant impairments or TMDLs:

Part IV: Minimum Control Measures

Part IV includes some of the metrics that will be required in upcoming annual reports. For this annual report, these metrics are optional for new permittees; please fill out any of the metrics below that you have started within this reporting period. Then, proceed to Part V.

MCM1: Public Education

Number of educational messages completed **during this reporting period:** 3

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: Brochures/Pamphlets

Message Description and Distribution Method:

MCM 1-2 was an educational brochure conveying a message targeting the importance of proper parking lot management and other important property maintenance tips.

Targeted Audience: Businesses, institutions and commercial facilities

Responsible Department/Parties: Town Administrator's office

Measurable Goal(s):

Allow businesses to review materials and ask the Town questions if needed. The Town will report the number of businesses that received the educational materials for review.

Message Date(s): Spring 2020

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:

Due to COVID-19, the Town posted this information on their website for the public to review. This message is located in the following link, <https://www.dunstable-ma.gov/stormwater-ms4/pages/messages-businesses>

BMP: Brochure/Pamphlets

Message Description and Distribution Method:

Due to Appendix H requirements, the Town of Dunstable will supplement its program with annual timed messages on specific topics. These educational brochures/pamphlets will be distributed in the spring (March/April) on grass clippings and phosphorous-free fertilizers, in the summer (June/July) on pet waste management, and in the Fall (Sept/Oct) on proper disposal leaf litter. Distribution will be carried out through mailing and keeping brochures/pamphlets available in public building locations for viewing and distribution such as the Town Hall and Library.

Targeted Audience: Residents

Responsible Department/Parties: Town Administrator's office

Measurable Goal(s):

Allow residents to review materials and ask the Town questions if needed. A survey will be distributed at 2021 Annual Town Meeting. Based on the data provided from the surveys, the Town will know if this MCM 1-4 was effective.

Message Date(s): NOI states 2019 but the Town will conduct this task in 2020 to allow the full year cycle for educational purposes.

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:

Due to COVID-19, the Town posted this information on their website for the public to review. This message is located in the following link, <https://www.dunstable-ma.gov/stormwater-ms4/pages/messages-residents>

BMP:Newspaper Article/Press Releases

Message Description and Distribution Method:

Due to Appendix H requirements, the Town of Dunstable will supplement its program with annual timed messages on specific topics. These Newspaper articles/Press Releases will be distributed in the spring (March/April) on grass clippings and phosphorous-free fertilizers, in the summer (June/July) on pet waste management, and in the Fall (Sept/Oct) on proper disposal leaf litter.

Targeted Audience: Businesses, institutions and commercial facilities

Responsible Department/Parties: Town Administrator's office

Measurable Goal(s):

Allow Businesses to review materials and ask the Town questions if needed. The Town will report the number businesses it has delivered the educational materials.

Message Date(s): NOI states 2019 but the Town will conduct this task in 2020 to allow the full year cycle for educational purposes.

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:

Due to COVID-19, the Town posted this information on their website for the public to review. This message is located in the following link, <https://www.dunstable-ma.gov/stormwater-ms4/pages/notices-reminders>

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 public has access to the SWMP on the Town's Website, <https://www.dunstable-ma.gov/stormwater-ms4/pages/stormwater-management-plan>, and is allowed to comment on the stormwater management plan annually.

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:**

A link was created on the Town website allowing residents to report any problems or violations from the privacy and comfort of their phone or computer. <https://www.dunstable-ma.gov/stormwater-ms4>

Allow public to review the annual report. <https://www.dunstable-ma.gov/stormwater-ms4/pages/stormwater-ms4-annual-reports>

A Stormwater Committee/Task Force met on May 8, 2020 via zoom to discuss status of tasks required in the SWMP.

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:

Below, report on the total number of SSOs identified in the MS4 system and removed to date. At a minimum, report SSOs identified **since the effective date of the permit (July 1, 2018).**

Total number of SSOs identified:

Total number of SSOs removed:

MS4 System Mapping

Below, check all that apply.

The following elements of the Phase I map have been completed:

☒ Outfalls and receiving waters

- ☐ Open channel conveyances
- ☐ Interconnections
- ☒ Municipally-owned stormwater treatment structures
- ☒ Waterbodies identified by name and indication of all use impairments
- ☒ Initial catchment delineations

Describe any additional progress you made on your map during this reporting period or provide additional status information regarding your map:

Northern Middlesex Council of Government (NMCOG) has been provided data and created a Map using GIS. Interconnections and open channel conveyances do not apply for the Town of Dunstable.

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.*

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

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

Number of outfalls screened:

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.*

- ☐ The catchment investigation data is attached to the email submission
- ☐ The catchment investigation data can be found at the following website:

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

Number of catchment investigations completed this reporting period:

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

Percent of total catchments investigated:

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

IDDE Progress

If illicit discharges were found, please submit a document describing work conducted over this reporting period, and cumulative to date, including location source; description of the discharge; method of discovery; date of discovery; and date of elimination, mitigation, or enforcement OR planned corrective measures and schedule of removal.

- ☐ The illicit discharge removal report is attached to the email submission
☐ The illicit discharge removal report can be found at the following website:

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

Number of illicit discharges identified:

Number of illicit discharges removed:

Estimated volume of sewage removed: gallons/day

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

Total number of illicit discharges identified:

Total number of illicit discharges removed:

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

No illicit discharges found or reported during the time period.

Employee Training

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

Town Staff attended training via Northern Middlesex Stormwater Council on May 21, 2020 (NMSC MS4 Grant Workshop #1: Project Kick-off and Stormwater Code Self-Assessment), March 26, 2020 (NMSC Meeting with presentation by DEP and EPA on MS4 permit changes), December 13, 2019, and August 14, 2019 (NMSC Training Session on Annual Reporting (provided by EPA and DEP) and water quality test kits (Tighe and Bond)). An EPA training was attended on February 19, 2020.

Further, a Stormwater Consultant met with the Finance Advisory Board on August 14, 2019 and the Board of Health on July 16, 2019 and the staff from all departments involved with the SWMP on May 8, 2020 to discuss tasks, needs and training.

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: 12

Number of inspections completed: 3

Number of enforcement actions taken: 0

MCM5: Post-Construction Stormwater Management in New Development and Redevelopment

Ordinance Development

Describe the status of the post-construction ordinance required to be complete by year 3 of the permit term:

The Post-Construction Stormwater Management of New Developments and Redevelopments Bylaw requirements have been incorporated into the Town's existing Stormwater Bylaw. This draft is currently being reviewed with Town Counsel and planned to be presented for the future Annual Town Meeting for approval.

As-built Drawings

Describe the status of the measures the MS4 has utilized to require the submission of as-built drawings and ensure long term operation and maintenance of completed construction sites:

This has been completed and is incorporated into the Stormwater Management Regulations that were recently revised and approved by the Planning Board on June 15, 2020.

Street Design and Parking Lots Report

Describe the status of the street design and parking lots assessment including any planned or completed changes to local regulations and guidelines:

This task is to be completed during year 2022 according the the SWMP. At this time, no work has commenced on this task.

Green Infrastructure Report

Describe the status of the green infrastructure report, including the findings and progress towards making the practice allowable:

This task is to be completed during year 2022 according the the SWMP. At this time, no work has commenced on this task.

Retrofit Properties Inventory

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

This task is to be completed during year 2021 according the the SWMP. Permittee-owned properties have been inventoried and plans for modification will be completed by next permit year.

MCM6: Good Housekeeping**Catch Basin Cleaning**

Describe the status of the catch basin cleaning optimization plan:

This plan was given to the Highway Department for implementation.

If complete, attach the catch basin cleaning optimization plan or the schedule to gather information to develop the optimization plan:

- ☒ The catch basin cleaning optimization plan or schedule is attached to the email submission
- ☐ The catch basin cleaning optimization plan or schedule can be found at the following website:

*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: 153

Number of catch basins cleaned: 153

Total volume or mass of material removed from all catch basins: 6 cubic yards

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

Total number of catch basins: 153

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

Describe the status of the written procedures for sweeping streets and municipal-owned lots:

This plan has been created and given to the Highway Department to implement.

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

☐ Number of miles cleaned:

☐ Volume of material removed:

[Select Units]

☐ Weight of material removed:

[Select Units]

If applicable:

For rural uncurbed roadways with no catch basins, describe the progress of the inspection, documentation, and targeted sweeping plan:

O&M Procedures and Inventory of Permittee-Owned Properties

Below, check all that apply.

The following permittee-owned properties have been inventoried:

- ☒ Parks and open spaces
- ☒ Buildings and facilities
- ☐ Vehicles and equipment

The following O&M procedures for permittee-owned properties have been completed:

- ☒ Parks and open spaces
- ☒ Buildings and facilities
- ☐ Vehicles and equipment

Winter Road Maintenance

Describe the status of the written procedures for winter road maintenance including the storage of salt and sand:

This plan was completed and given to the Highway Department for implementation.

Stormwater Pollution Prevention Plan (SWPPP)

Describe the status of any SWPPP for permittee-owned or operated facilities including maintenance garages, public works yards, transfer stations, and other waste handling facilities where pollutants are exposed to stormwater:

The Town of Dunstable does not have the following permittee-owned or operated facilities with the UA: maintenance garages, public works yards, transfer stations, and other waste handling facilities where pollutants are exposed to stormwater as determined by the permittee. As a result, a SWPPP will not be needed at this time.

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:

O&M Procedures for Stormwater Treatment Structures

Describe the status of the written procedure for stormwater treatment structure maintenance:

This plan was created and given to the Highway Department for implementation.

Part V: Additional Information

Monitoring or Study Results

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

- ☒ Not applicable
- ☐ The results from additional reports or studies are attached to the email submission
- ☐ The results from additional reports or studies can be found at the following website(s):

If such monitoring or studies were conducted on your behalf or if monitoring or studies conducted by other entities were reported to you, a brief description of the type of information gathered or received shall be described below:

Additional Information

Optional: Enter any additional information relevant to your stormwater management program implementation during the reporting period. Include any BMP modifications made by the MS4 if not already discussed above:

COVID-19 Impacts

Optional: If any of the above year 2 requirements could not be completed due to the impacts of COVID-19, please identify the requirement that could not be completed, any actions taken to attempt to complete the requirement, and reason the requirement could not be completed below:

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

Yes, I agree ☒

- Complete IDDE ordinance
- Complete Construction/ Erosion and Sediment Control (ESC) ordinance
- Develop written procedures for site inspections and enforcement of sediment and erosion control measures
- Develop written procedures for site plan review

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
- Continue public education and outreach program

Provide any additional details on activities planned for permit year 3 below:

The Town of Dunstable plans to have MCM 3-6 Phosphorus Source Identification Report and MCM 5-4 List of Municipal Retrofit Opportunities completed for year 3.

Part VI: Certification of Small MS4 Annual Report 2020

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:

Brian M. Palaia

Title: Town Administrator

Signature:

Brian Palaia

Digitally signed by Brian Palaia
Date: 2020.09.15 10:57:29
-04'00'

Date:

*[Signatory may be a duly authorized
representative]*