

**Year 3 Annual Report**  
**Massachusetts Small MS4 General Permit**  
**New Permittees**  
**Reporting Period: July 1, 2020-June 30, 2021**

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

*Unless otherwise noted, all fields are required to be filled out. If a field is left blank, it will be assumed the requirement or task has not been completed. Please ONLY report on activities between July 1, 2020 and June 30, 2021 unless otherwise requested.*

**Part I: Contact Information**

Name of Municipality or Organization:

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 (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.

### Impairment(s)

- ☐ Bacteria/Pathogens      ☐ Chloride      ☐ Nitrogen      ☒ Phosphorus  
☐ Solids/ Oil/ Grease (Hydrocarbons)/ Metals

### TMDL(s)

- In State:*      ☐ Assabet River Phosphorus      ☐ Bacteria and Pathogen      ☐ Cape Cod Nitrogen  
☐ Charles River Watershed Phosphorus      ☐ Lake and Pond Phosphorus

- Out of State:*      ☐ Bacteria/Pathogens      ☐ Metals      ☐ Nitrogen      ☐ Phosphorus

**Clear Impairments and TMDLs**

Next, check off all requirements below that have been completed. **By checking each box you are certifying that you have completed that permit requirement fully.** If you have not completed a requirement leave the box unchecked. Additional information will be requested in later sections.

### Year 3 Requirements

- ☒ IDDE ordinance or other regulatory mechanism complete and adopted
- ☒ Construction/ Erosion and Sediment Control (ESC) ordinance or other regulatory mechanism complete and adopted
- ☒ Post-construction bylaw, ordinance, or other regulatory mechanism complete and adopted
- ☒ Developed written procedures for site inspections and enforcement of sediment and erosion control measures
- ☒ Developed written procedures for site plan review
- ☒ Kept a log of catch basins cleaned and inspected

*Optional:* If you would like to describe progress made on any incomplete requirements listed above, provide any additional information, and/or if any of the above year 3 requirements could not be completed due to the impacts of COVID-19, please identify the requirement that could not be completed, any actions taken to attempt to complete the requirement, and reason the requirement could not be completed below:

### Annual Requirements

- ☒ Provided an opportunity for public participation in review and implementation of SWMP and complied with State Public Notice Requirements
- ☒ Kept records relating to the permit available for 5 years and made available to the public
- ☒ 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

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

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

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

*Good Housekeeping and Pollution Prevention for Permittee Owned Operations*

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

*Potential structural BMPs*

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

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

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

A list for retrofitted municipal opportunities were created as required for the permit.

*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? 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, please report on MCM1 and MCM2 and any other metrics below that have an asterisk (\*), along with any other metrics that you have started within this reporting period. Other than the metrics with an asterisk, the rest of the metrics are optional for new permittees. Then, proceed to Part V.*

### \*MCM1: Public Education

Number of educational messages completed during this reporting period: 2

*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:MCM 1-4 and 1-5**

Message Description and Distribution Method:

The educational messages were focused to small businesses and resident audience. All messages are posted on the Dunstable Town website, <https://www.dunstable-ma.gov/stormwater-ms4/pages/messages-residents>. The focus for small businesses was specific to property maintenance tips, dispose of hazardous waste, grease traps, and preventing stormwater pollution. The message targeted to residents was on protecting your lake or pond from stormwater pollution with an emphasis on over fertilizing and researching phosphorus content.

Targeted Audience: businesses and residents

Responsible Department/Parties: Town Administrator's office

Measurable Goal(s):

Allow targeted audience to review materials and ask Town questions if needed.

Message Date(s): All year long

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 the pandemic, meetings and distribution of pamphlets was refrained. Educational messages were kept to the website for audience to review from safety of their own location.

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:**

An entire page has been dedicated to Stormwater on the Town's Website, <https://www.dunstable-ma.gov/stormwater-ms4>.

Public have access to review the annual report, <https://www.dunstable-ma.gov/stormwater-ms4/pages/stormwater-ms4-annual-reports>

**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:

### **Screening of Outfalls/Interconnections**

*If conducted, please submit any outfall monitoring results from this reporting period. Outfall monitoring results should include the date, outfall/interconnection identifier, location, weather conditions at time of sampling, precipitation in previous 48 hours, field screening parameter results, and results from all analyses. Please also include the updated inventory and ranking of outfalls/interconnections based on monitoring results.*

- ☒ No outfalls were inspected
- ☒ The outfall screening data is attached to the email submission
- ☐ The outfall screening data can be found at the following website:

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

Number of outfalls screened:

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

Percent of outfalls screened:

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

### **Catchment Investigations**

*If conducted, please submit all data collected **during this reporting period** as part of the dry and wet weather investigations. Also include the presence or absence of System Vulnerability Factors for each catchment.*

- ☒ No catchment investigations were conducted
- ☐ The catchment investigation data is attached to the email submission
- ☐ The catchment investigation data can be found at the following website:

*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: 100

*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 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: 0

Number of illicit discharges removed: 0

Estimated volume of sewage removed: 0 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: 0

Total number of illicit discharges removed: 0

*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 if conducted during this reporting period:

Town staff attended trainings held by the Northern Middlesex Council of Governments via zoom.

**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: 0

Number of inspections completed: 0

Number of enforcement actions taken: 0

*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****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 was completed last reporting period.

**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 the year 2022 according to the SWMP. At this time, no work has been 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 the year 2022 according to the SWMP. At this time, no work has been 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:

The inventory of permittee-owned properties that could be modified or retrofitted with BMPs to mitigate impervious areas has been completed. Planning for future modifications is in progress.

## **MCM6: Good Housekeeping**

### **\*Catch Basin Cleaning**

Describe the status of the catch basin cleaning optimization plan:

This plan has been 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:

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, if known.*

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**

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

This plan has been created and was given to the Highway Department to implement. Street sweeping was completed twice in this reporting period (Fall/Spring). Material removed was included with the CB disposal as referenced above (100 CY). Mileage unknown as only a portion of the Town is under permit requirements.

Report on street sweeping completed **during this 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 within 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:

MCM 3-6 Phosphorus Source Identification Report was completed as part of the requirements of Appendix H.

### **COVID-19 Impacts**

*Optional:* If any of the above year 3 requirements could not be completed due to the impacts of COVID-19, please identify the requirement that could not be completed, any actions taken to attempt to complete the requirement, and reason the requirement could not be completed below:

BMP MCM 2-6 Public Participation - Public Meeting was not held due to COVID-19. This has been moved to year 2022.

### **\*Activities Planned for Next Reporting Period**

Please confirm that your SWMP has been, or will be, updated to comply with all applicable permit requirements including but not limited to the year 4 requirements summarized below. (Note: impaired waters and TMDL requirements are not listed below)

Yes, I agree ☒

- Identify and develop inventory of all known locations where SSOs have discharged to the MS4 in the last 5 years
- Identify each outfall and interconnection discharging from MS4, classify into the relevant category, and priority rank each catchment for investigation
- Develop written IDDE plan including a procedure for screening and sampling outfalls
- Develop written procedures to require the submission of as-built drawings and ensure the long term operation and maintenance of completed construction sites and add these procedures to the SWMP
- Develop written operations and maintenance procedures for parks and open space, buildings and facilities, and vehicles and equipment and added these procedures to the SWMP
- Develop an inventory of all permittee owned facilities in the categories of parks and open space, buildings and facilities, and vehicles and equipment and added this inventory to the SWMP
- Complete a written program for MS4 infrastructure maintenance to reduce the discharge of pollutants
- Develop written SWPPPs, included in the SWMP, for all of the following permittee owned or operated facilities: maintenance garages, public works yards, transfer stations, and other waste handling facilities where pollutants are exposed to stormwater
- Enclose or cover storage piles of salt or piles containing salt used for deicing or other purposes

#### 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
- Sweep all curbed roadways at least once within the reporting period
- Provide training within the reporting period to employees involved in IDDE program
- Clean catch basins in accordance with catch basin cleaning procedures to ensure that no catch basin is greater than 50% full

Provide any additional details on activities planned for permit year 4 below:

The following BMP's are planned for permit year 4:

MCM 1-3 Meeting with Developers

MCM 2-2 Public Participation in Stormwater Management Program Development (Annually)

MCM 2-3 Public Participation for reporting problems/violations (Annually)

MCM 2-4 Public Review of Annual Report (Annually)

MCM 2-6 Public Participation - Public Meeting

MCM 2-7 Public Participation - Clean-ups - Roadside/General

MCM 3-4 Employee Training (Annually)

MCM 5-2 Street Design and Parking Lot Guidelines Report

MCM 5-3 Green Infrastructure Report

**\*Part VI: Certification of Small MS4 Annual Report 2021****40 CFR 144.32(d) Certification**

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, I certify that the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

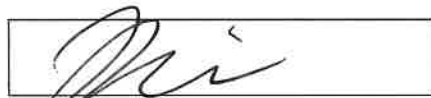
Name:

Brian M. Palaia

Title:

Town Administrator

Signature:



Date:

8-16-21

*[Signatory may be a duly authorized  
representative]*