

Year 1 Annual Report
Massachusetts Small MS4 General Permit
Reporting Period: May 1, 2018-June 30, 2019

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.

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:

Fax 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 and an explanation of why it is not posted on the web:

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 1 Requirements

- Develop and begin public education and outreach program
- Identify and develop inventory of all known locations where SSOs have discharged to the MS4 in the last 5 years
 - The SSO inventory is attached to the email submission
 - The SSO inventory can be found at the following website:

www.westfordma.gov/stormwater
- Develop written IDDE plan including a procedure for screening and sampling outfalls
- IDDE ordinance complete
- Identify each outfall and interconnection discharging from MS4, classify into the relevant category, and priority rank each catchment for investigation
 - The priority ranking of outfalls/interconnections is attached to the email submission
 - The priority ranking of outfalls/interconnections can be found at the following website:

www.westfordma.gov/stormwater
- Construction/ Erosion and Sediment Control (ESC) ordinance complete
- Develop written procedures for site inspections and enforcement of sediment and erosion control measures
- Develop written procedures for site plan review
- Keep a log of catch basins cleaned or inspected
- Complete inspection of all stormwater treatment structures

Annual Requirements

- Annual opportunity for public participation in review and implementation of SWMP
- Comply with State Public Notice requirements
- 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
- All curbed roadways have been swept a minimum of one time per year

Bacteria/ Pathogens (Combination of Impaired Waters Requirements and TMDL Requirements as Applicable)

Annual Requirements

*Public Education and Outreach**

- Annual message encouraging the proper management of pet waste, including noting any existing ordinances where appropriate
- Permittee or its agents disseminate educational material to dog owners at the time of issuance or renewal of dog license, or other appropriate time
- Provide information to owners of septic systems about proper maintenance in any catchment that discharges to a water body impaired for bacteria

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

Phosphorus (Combination of Impaired Waters Requirements and TMDL Requirements as Applicable)

Annual Requirements

*Public Education and Outreach**

- Distribute 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
- Distribute an annual message in the summer (June/July) encouraging the proper management of pet waste, including noting any existing ordinances where appropriate
- Distribute 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

- Increase 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)

Solids, Oil and Grease (Hydrocarbons), or Metals

Annual Requirements

Good Housekeeping and Pollution Prevention for Permittee Owned Operations

- Increase street sweeping frequency of all municipal owned streets and parking lots to a schedule to target areas with potential for high pollutant loads
- Prioritize inspection and maintenance for catch basins to ensure that no sump shall be more than 50 percent full; Clean catch basins more frequently if inspection and maintenance activities indicate excessive sediment or debris loadings

Use the box below to input additional details on any unchecked boxes above or any additional information you would like to share as part of your self assessment:

This Permit Year the town began using a tablet application to more efficiently track catch basin cleaning and inspections. The tablet is used to electronically record the cleaning date, percent full, presence of any potential illicit connections, and identify any required maintenance work. The data collected is automatically uploaded into the town's GIS once a catch basin is cleaned. Over time the tablet application and data collection will better inform the town on which catch basins require more frequent cleaning, help to prioritize cleaning activities, and to identify and address areas in town that experience excessive sediment loading.

Year 1 Requirements, Inspect all stormwater treatment structures: Mapping of structural BMPs and stormwater treatment structures is not due until Permit Year 2. Therefore, BMPs were not inspected during Permit Year 1. This will begin in Permit Year 3, after town-owned structural BMPs and treatment structures have been identified and mapped as part of Phase I mapping efforts.

Phosphorus Good Housekeeping: All streets are swept at least once annually, and priority areas (e.g., town center) are swept more often. The town anticipates increasing the street sweeping frequency in target watersheds in future Permit Years to meet impairment and TMDL requirements, dependent on funding available from the stormwater fee that is currently in the process of being established (see the "Additional Information" section at the end of this report for more about the stormwater fee).

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:

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 the reporting period:

Below, report on the educational messages completed during the first year. For the measurable goal(s) please describe the method/measures used to assess the overall effectiveness of the educational program.

BMP: Education and Outreach to Residents and Businesses: Stormwater Pollution

Message Description and Distribution Method:

Westford Water Department Resource Newsletter. A stormwater article was included in the newsletter defining what is considered stormwater. The article also discussed how common pollutants such as oil, fertilizer, pesticides, road salts, trash, and pet waste are picked up by stormwater runoff which ultimately discharges into Westford's natural resources. The publication was mailed to every property address in the town of Westford. It helps address the public education requirements of Appendix F for the Assabet River phosphorus TMDL and Appendix H for waters impaired by bacteria/pathogens.

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:

BMP: Education and Outreach to Residents and Businesses: Various Messages

Message Description and Distribution Method:

Westford Water Department Resource Newsletter. A stormwater article was included in the newsletter outlining responsible lawn care, septic system maintenance, pet waste management, and household chemical disposal. The publication was mailed to every property address in the town of Westford. It helps address the public education requirements of Appendix F for the Assabet River phosphorus TMDL and Appendix H for waters impaired by bacteria/pathogens.

Targeted Audience:

Responsible Department/Parties: Engineering

Measurable Goal(s):

The Water Department newsletter is mailed to 8,717 residential properties and 889 businesses.

Message Date(s): Spring 2019

Message Completed for: Appendix F Requirements Appendix H Requirements Was this message different than what was proposed in your NOI? Yes No

If yes, describe why the change was made:

BMP:Education and Outreach to Residents: Pet Waste Management

Message Description and Distribution Method:

A Dog Waste and Surface Water Quality brochure was created in March 2019. The brochure was mailed to dog owners that applied for new licenses after March 2019. The brochure will also be provided to all dog owners during the annual license renewals in January (approximately 2,700 renewals). The brochure includes information on why pet waste is harmful to the environment and provided guidance on how to properly collect and dispose of the waste. Hard copies of the brochure were also made available to the general public at the Town Clerk office in Town Hall. The brochure helps address the public education requirements of Appendix H for waters impaired by bacteria/pathogens.

Targeted Audience: Residents

Responsible Department/Parties: Engineering

Measurable Goal(s):

The brochure was mailed to 82 dog owners that applied for new dog licenses in Permit Year 1. Additional brochures are also on display at Town Hall and available to all visitors.

Message Date(s): Ongoing

Message Completed for: Appendix F Requirements Appendix H Requirements Was this message different than what was proposed in your NOI? Yes No

If yes, describe why the change was made:

BMP:Education and Outreach to Developers: Erosion and Sediment Control

Message Description and Distribution Method:

A Stormwater Pollution Prevention Tips for Small Residential Construction Sites brochure was created and made available to contractors applying for building permits that involved land disturbance and to contractors

applying for street opening permits associated with site development projects. The brochure included information outlining how sediment that leaves a construction site is considered a pollutant that will eventually enter a storm drain or waterway which is against local, state, and federal laws. An EPA graphic representing a typical small construction site was included which highlights various activities and measures that can be put into place to prevent the discharge of erosion. The brochure also included web links for additional stormwater related information and town contacts.

Targeted Audience: Developers (construction)

Responsible Department/Parties: Engineering

Measurable Goal(s):

The brochures are available to all visitors of the Permitting office and were posted on the town's stormwater webpage. Starting in Permit Year 2, permits distributed by the Permitting office will include the educational brochures.

Message Date(s): Ongoing

Message Completed for: Appendix F Requirements Appendix H Requirements

Was this message different than what was proposed in your NOI? Yes No

If yes, describe why the change was made:

BMP: Education and Outreach to Residents: Lawn and Garden Tips

Message Description and Distribution Method:

The Think Blue Massachusetts Lawn and Garden Tips to Help Curb Stormwater Pollution flyer was included in the Town Manager's June 2019 Newsletter. The flyer included recommended practices for maintaining a healthy lawn while reducing stormwater pollution. Instructions include guidance on the use of fertilizers, disposal of grass clippings and leaves, and mowing techniques. The flyer helps address the public education requirements of Appendix F for the Assabet River phosphorus TMDL.

Targeted Audience: Residents

Responsible Department/Parties: Engineering

Measurable Goal(s):

This message was delivered to 758 subscribers of the Town Manager's monthly newsletter. In addition, the June 2019 newsletter received 243 webpage views.

Message Date(s): June 2019

Message Completed for: Appendix F Requirements Appendix H Requirements

Was this message different than what was proposed in your NOI? Yes No

If yes, describe why the change was made:

BMP:Education and Outreach to Residents: Septic System Care

Message Description and Distribution Method:

The Westford Health Department sponsored a "Get to Know Your Septic System" presentation at the Westford Town Hall. The presentation included an overview of how septic systems function and how to properly maintain them. The presentation also included a discussion on private water supply wells. A Q&A session followed the presentation. The presentation helps address the public education requirements of Appendix H for waters impaired by bacteria/pathogens.

Targeted Audience: Residents

Responsible Department/Parties: Health Department

Measurable Goal(s):

Multiple residents attended the presentation.

Message Date(s): December 5, 2018

Message Completed for: Appendix F Requirements Appendix H Requirements Was this message different than what was proposed in your NOI? Yes No

If yes, describe why the change was made:

BMP:Education and Outreach to Residents: Stormwater Management

Message Description and Distribution Method:

A stormwater management message was included in Westford's 2019 Census newsletter. The message provided an overview of funding alternatives to address future stormwater budgetary demands as well as the need to invest in the town's aging drainage infrastructure. The message also provided a link that gave residents the opportunity to be added to a contact list to receive email notices about upcoming stormwater related public meetings.

Targeted Audience: Residents

Responsible Department/Parties: Engineering

Measurable Goal(s):

This message reached all Westford residential properties.

Message Date(s): January 2019

Message Completed for: Appendix F Requirements Appendix H Requirements Was this message different than what was proposed in your NOI? Yes No

If yes, describe why the change was made:

BMP: Education and Outreach to Developers: Construction Site Erosion

Message Description and Distribution Method:

The Think Blue Massachusetts Stop Erosion in its Tracks to Keep Our Waters Clean flyer was included in the Westford Town Manager's June 2019 Newsletter. The flyer included what developers can and can't do when disturbing land. The flyer provided direction on the various types of permits that could potentially be required along with recommended erosion control practices that could be implemented. The flyer also include reasons why controlling erosion within a construction project is important.

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

This message was delivered to 758 subscribers of the Town Manager's monthly newsletter. In addition, the June 2019 newsletter received 243 webpage views.

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:

BMP: Education and Outreach to Residents: Septic System Operation

Message Description and Distribution Method:

A septic system article was included in the Town Manager's May 2019 Newsletter. The article describes how septic systems are a vital part of our local ecosystem and stressed the importance of regularly maintaining the system. Included was a list of tips on things that should never be put into a septic system. A link to a list of licensed system inspectors was provided along with a Health Department contact. The article helps address the public education requirements of Appendix H for waters impaired by bacteria/pathogens.

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

This message was delivered to 758 subscribers of the Town Manager's monthly newsletter. In addition, the May 2019 newsletter received 242 webpage views.

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:

BMP: Education and Outreach to Residents: Watershed Protection Tips for Residents

Message Description and Distribution Method:

Copies of the Northern Middlesex Stormwater Collaborative's Watershed Protection Tips for Residents was made available to the public at various events including Special Town Meeting, Westford Business Association Meeting, Annual Town Meeting and the Annual Strategic Planning Retreat. The brochure includes topics relevant to the public education requirements in Appendix F for the Assabet River phosphorus TMDL and Appendix H for waters impaired by bacteria/pathogens.

Targeted Audience: Residents

Responsible Department/Parties: Engineering

Measurable Goal(s):

This messaging was available to all residents that attended these meetings.

Message Date(s): 10/15/18, 3/7/19, 3/23/19, 6/13/19

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: Public Education and Outreach to All Audiences: Various PSAs

Message Description and Distribution Method:

Stormwater related public Service Announcements (PSAs) were broadcast on local community access television (WestfordCAT) during Permit Year 1. The PSAs were prepared by the Northern Middlesex Stormwater Collaborative (NMSC). A link to these PSAs was also added to the town's Stormwater website.

Targeted Audience: Various

Responsible Department/Parties: Engineering

Measurable Goal(s):

The PSAs are broadcast on WestfordCAT. Additionally, there are approximately 300 views of the PSAs on YouTube.

Message Date(s): Ongoing

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: Public Education and Outreach to Residents: Think Blue "Water Fowl" Campaign

Message Description and Distribution Method:

The Town is a member of the Northern Middlesex Stormwater Collaborative (NMSC), which participated in the Think Blue Massachusetts educational advertisement campaign. Think Blue Massachusetts created a baseline survey to gauge community knowledge on stormwater, released an advertising campaign that targeted member communities, and carried out a follow-up survey to measure the impact of the advertising campaign. A "Fowl Water" video was shared across Facebook, Instagram, and YouTube to educate the public on stormwater runoff, and highlighted proper pet waste management as an example.

Targeted Audience: Residents

Responsible Department/Parties: Engineering

Measurable Goal(s):

In 2018, the campaign reached more than 370,000 people in Northern Middlesex towns, and the campaign received more than 1,000,000 impressions across Facebook and Google. In 2019, the follow-up survey indicated that 15.25% of respondents recalled seeing the "Fowl Water" video and those that saw the video were more likely to correctly answer that stormwater pollution ends up in local waterways. The 2019 ad campaign received 30,221 impressions across Facebook, Instagram, and YouTube for Westford.

Message Date(s): May 31 - June 25, 2018 and June 23 - July 12, 2019

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 the reporting period:

Westford's Stormwater Program was discussed at the following Board of Selectmen meetings: 11/27/18,

2/26/19, 4/9/19, 4/23/19, 5/28/19 & 6/11/19. All BoS meetings were advertised in accordance with public meeting laws. The meetings were also televised live on local community access television (WestfordCAT) and the recorded broadcasts were made available for on demand viewing through WestfordCAT's website.

Westford's Stormwater Advisory Group met on 11/27/18 to discuss the development of a stormwater fee and to review a schedule of public outreach.

A hard copy of the town's NPDES Stormwater Program Compliance Plan was made available at the library for review and comment by the general public beginning on 2/13/19. The Plan is also posted on the town's website complete with instructions on how the public could provide comments or input on the plan.

The town's Stormwater Management Master Plan was made available for review on the town's website and at Annual Town in March 2019.

Stormwater Management was one of two featured topics at the town's June 13, 2019 Strategic Planning Retreat which is an annual event held at Kimball Farm in Westford. The main objective of the retreat is to give the public the opportunity to interact with elected officials and town staff in an environment that is more social and a less formal setting than typical Board, Committee, and Town meetings. The retreat included a 45 minute long facilitated discussion that was focused on new MS4 permit requirements, responsible stormwater management practices, stormwater budgeting, municipal funding options, and potential stormwater related impacts on town residents and businesses. An online survey focused on stormwater financing was completed by 46 of the attendees. A stormwater exhibit was also setup at the retreat which included information on water resources management, educational brochures, stormwater FAQs, and infrastructure facts. The Engineering Department staffed the exhibit and was available to answer questions. The retreat was open to all town residents and business owners and was attended by more than 450 people.

Was this opportunity different than what was proposed in your NOI? Yes No

Describe any other public involvement or participation opportunities conducted during the reporting period:

The Westford Engineering Department continued participating in the Living Lab Program which teaches every 5th grader in the Westford school system about natural resources, pollution and stormwater management. The program provides both classroom discussions and hands-on field demonstrations designed to educate the students on the importance of responsible stormwater management.

The town hosts regular clean up and recycling events throughout the Permit Year. An e-waste collection event was held in May 2019 that produced 83,258 lbs of recyclables. Disposal of yard waste debris (brush and leaves) was available to all Westford residents during March and April, 2018. Leaf litter collection was available to residents for a small fee in October 2018. A bi-annual Household Hazardous Waste collection day was held for residents on May 18, 2019.

Westford has an established Stream Team that has monitored the water quality of Westford's brooks since 2005.

Volunteers throughout Westford are part of the Litter League Green Team, which aims to pick up trash along Westford's roadways. The Highway Department provided the Green Team with kits and supplies needed for the cleanups, and collects the full bags and flagged items left at the roadside by the Litter League Teams.

Westford's Stormwater Program was also discussed at the following meetings:

Annual Town Meeting (3/23/19), Planning Board (1/28/19), Water Commissioners (2/7/19) Finance Committee (2/14/19), Capital Committee (2/15/19), Stormwater Advisory Group (11/27/18), Stormwater

Stakeholders (2/19/19) & Rotary Club (1/10/19)

MCM3: Illicit Discharge Detection and Elimination (IDDE)

Sanitary Sewer Overflows (SSOs)

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 2013.

Total number of SSOs identified:

Total number of SSOs removed:

MS4 System Mapping

Describe the status of your MS4 map, including any progress made during the reporting period:

The town's GIS mapping includes all town owned outfalls, receiving waters and impairments, initial catchment delineations, structures, and most drainage pipes. The town's mapping currently includes some private drainage, and the ownership is being assigned as mapping is refined. The town recently purchased a GPS unit as part of the Northern Middlesex Stormwater Collaborative to assist in improving and advancing the MS4 mapping. The GPS is currently being used to locate new drainage infrastructure that was recently installed as part of capital improvement projects. The town is also in the process of inserting available as-built plans into our GIS to verify drainage system connectivity. Summer interns have assisted with improving the system mapping by verifying connectivity in the field.

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:

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

Percent of total 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:

N/A

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

Number of catchment investigations completed this reporting period: 0

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:

The town has not identified any problem catchments. Additionally, catchment investigations for high and low priority catchments do not need to begin until dry weather screening is complete, so the town did not begin catchment investigations in Permit Year 1.

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:

N/A

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: N/A

Estimated volume of sewage removed: N/A

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.

Total number of illicit discharges identified: 0

Total number of illicit discharges removed: N/A

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 the reporting period:

An Illicit Discharge Detection & Elimination Training (IDDE) session was held on June 25, 2019 at the Westford Highway Department. The training was conducted by the Westford Engineering Department and included an overview of the MS4 permit, types of illicit discharges, common pollutants, and how to recognize and report illicit discharges. The training was attended by the Westford Highway Department staff.

The Northern Middlesex Stormwater Collaborative (NMSC) sponsored a stormwater management training session at the Westford Highway Department on March 26, 2019. Among the presenters was Fred Civian, MassDEP Stormwater Coordinator. The training topics focused on preparing a Stormwater Management Plan and IDDE Plan.

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:

Number of inspections completed:

Number of enforcement actions taken:

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

Ordinance Development

Describe the status of the post-construction ordinance required to be complete in year 2 of the permit term:

The town will review our existing Rules & Regulations for Stormwater Management by July 1, 2020 and update if necessary to address the new development and redevelopment requirements of the new permit.

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 required to be complete in year 2 of the permit term:

The town's current Stormwater Management regulations which were promulgated under the Stormwater Management Bylaw requires that as-built record drawings be submitted upon project completion. The regulations also require a Maintenance Agreement identifying the parties responsible for the operation and maintenance and perpetual inspections of all permitted stormwater systems. The Maintenance Agreement is

required to be recorded at the Registry of Deeds prior to the issuance of the town's final approval. The current bylaw and regulations adequately address as-built and operation and maintenance requirements required by year 2 of the permit term.

Street Design and Parking Lots Report

Describe the status of the street design and parking lots assessment due in year 4 of the permit term, including any planned or completed changes to local regulations and guidelines:

The street design and parking lot assessment will be completed by year 4 of the permit term.

Green Infrastructure Report

Describe the status of the green infrastructure report due in year 4 of the permit term, including the findings and progress towards making the practice allowable:

The green infrastructure report will be completed by year 4 of the permit term.

Retrofit Properties Inventory

Describe the status of the inventory, due in year 4 of the permit term, 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 will be completed by year 4 of the permit term.

MCM6: Good Housekeeping

Catch Basin Cleaning

Describe the status of the catch basin cleaning optimization plan:

SOPs for cleaning, inspection, and maintenance are included in Volume 3 of the town's Master Plan.

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:

Current SOPs for catch basin cleaning, inspection, and maintenance are available in Volume

3: Town-Wide Operation & Maintenance Plan of the town's Stormwater Management Master Plan, dated October 2016, at: www.westfordma.gov/stormwater. The town has started using a GIS-based tablet application to track catch basin cleaning and inspections, as described in the "Additional Information" section of Part II of this report. As the town collects more information about the status of catch basins in town, the SOPs in Volume 3 will be updated to reflect how the town plans to respond to basins that are more than 50% full.

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:

Since this was the first year of the permit, there has only been one routine inspection/cleaning cycle. In the future if a catch basin is more than 50% full during two consecutive inspections/cleanings then the town will investigate the associated catchment area and determine the best course of action to reduce and/or eliminate the source of sediment entering the catch basin.

Street Sweeping

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

Complete. Standard Operating Procedures (SOPs) for sweeping streets and town-owned parking lots was completed as part of the town's Stormwater Management Master Plan. The SOPs are included in Volume 3: Town-Wide Operation & Maintenance Plan dated October 2016.

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

Number of miles cleaned:

Volume of material removed: [UNITS]

Weight of material removed: [UNITS]

If applicable:

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

It is the town's intention to continue sweeping all uncurbed roadways.

Winter Road Maintenance

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

Complete. Standard Operating Procedures (SOPs) for winter road maintenance including the storage of salt and sand was completed as part of the town's Stormwater Management Master Plan. The SOPs are included in Volume 3: Town-Wide Operation & Maintenance Plan dated October 2016.

Inventory of Permittee-Owned Properties

Describe the status of the inventory, due in year 2 of the permit term, of permittee-owned properties, including parks and open spaces, buildings and facilities, and vehicles and equipment, and include any updates:

Complete. An inventory of permittee-owned properties, including parks and open spaces, buildings and facilities, and vehicles and equipment was completed as part of the town's Stormwater Management Master Plan. The inventory is included in Volume 3: Town-Wide Operation & Maintenance Plan dated October 2016.

O&M Procedures for Parks and Open Spaces, Buildings and Facilities, and Vehicles and Equipment

Describe the status of the operation and maintenance procedures, due in year 2 of the permit term, of permittee-owned properties (parks and open spaces, buildings and facilities, vehicles and equipment) and include maintenance activities associated with each:

Complete. O&M procedures for parks and open spaces, building and facilities, and vehicle and equipment was completed as part of the town's Stormwater Management Master Plan. The O&M procedures are included in Volume 3: Town-Wide Operation & Maintenance Plan dated October 2016.

Stormwater Pollution Prevention Plan (SWPPP)

Describe the status of any SWPPP, due in year 2 of the permit term, 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 will complete the required Stormwater Pollution Prevention Plans (SWPPPs) by the end of Permit Year 2. SWPPPs are required for Highway Facility and the School Department's Maintenance Garage. This work has been contracted out to the town's stormwater consultant. Though the town did complete some inspections of the Highway Facility and School Department's Maintenance Garages in Permit Year 1, the inspection frequency will be increased to meet General Permit requirements once the SWPPPs have been completed.

Below, report on the number of site inspections for facilities that require a SWPPP completed during this reporting period.

Number of site inspections completed:

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

N/A

O&M Procedures for Stormwater Treatment Structures

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

The town is in the process of compiling an inventory of municipally-owned stormwater BMPs which is scheduled to be complete by the end of Permit Year 2. The town's stormwater consultant is under contract with the town to prepare O&M procedures for all municipally-owned stormwater BMPs once all the different types of BMPs and their locations are identified in the inventory.

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:

The town is in the process of establishing a stormwater fee that will be assessed to all properties within the town that contain impervious surfaces. The purpose of the fee is to support the town's stormwater program, continue to remain in compliance with the MS4 permit requirements, to provide for a sustainable funding source for capital improvements to stormwater related infrastructure, and to improve town-wide O&M activities.

Westford completed a portion of the dry weather screening field effort prior to Permit Year 1. Included in this annual report is the data for all of the field work completed to date. The town continues to implement its IDDE

Program and complete dry weather outfall screening in accordance with the General Permit schedule.

The number of site plan reviews and site inspections listed in MCM 4 incorporates all construction sites in town, including those less than an acre in size, because the town's Stormwater Management Bylaw and Rules & Regulations for Stormwater Management are enforced throughout Westford.

The total number of catch basins in the town's GIS mapping is 3,652, which includes some private catch basins. Ownership is being assigned in the stormwater GIS as mapping is refined. The total number of town-owned catch basins will be refined in future Permit Years.

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

Yes, I agree

- Complete system mapping Phase I
- Begin investigations of catchments associated with Problem Outfalls
- Develop or modify an ordinance or other regulatory mechanism for post-construction stormwater runoff from new development and redevelopment
- Establish and implement written procedures to require the submission of as-built drawings no later than two years after the completion of construction projects
- Develop, if not already developed, written operations and maintenance procedures
- Develop an inventory of all permittee owned facilities in the categories of parks and open space, buildings and facilities, and vehicles and equipment; review annually and update as necessary
- Establish a written program detailing the activities and procedures the permittee will implement so that the MS4 infrastructure is maintained in a timely manner
- Develop and implement a written SWPPP for 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
- Develop, if not already developed, written procedures for sweeping streets and municipal-owned lots
- Develop, if not already developed, written procedures for winter road maintenance including storage of salt and sand
- Develop, if not already developed, a schedule for catch basin cleaning
- Develop, if not already developed, a written procedure for stormwater treatment structure maintenance
- Develop a written catchment investigation procedure (*18 months*)

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 in the last 5 years
- 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 uncurbed streets at least annually

Provide any additional details on activities planned for permit year 2 below:

The town acknowledges the General Permit Year 2 requirements and will complete as many activities as possible based on funding and staff availability. The town is also under contract with our stormwater consultant to provide professional engineering services for work related to Permit Year 2 compliance.

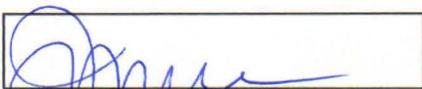
Part V: Certification of Small MS4 Annual Report 2019

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:

Title:

Signature: 

Date:

[Signatory may be a duly authorized representative]