

Year 2 Annual Report
Massachusetts Small MS4 General Permit
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:

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. Make sure you are referring to the most recent EPA approved Section 303(d) Impaired Waters List which can be found here: <https://www.epa.gov/tmdl/region-1-impaired-waters-and-303d-lists-state>

Impairment(s)

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

TMDL(s)

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

Out of State: Bacteria/Pathogens Metals Nitrogen Phosphorus

Clear Impairments and TMDLs

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

Year 2 Requirements

- Completed Phase I of system mapping
- Developed a written catchment investigation procedure and added the procedure to the SWMP
- Developed written procedures to require the submission of as-built drawings and ensure the long term operation and maintenance of completed construction sites and added these procedures to the SWMP
- Enclosed or covered storage piles of salt or piles containing salt used for deicing or other purposes
- Developed written operations and maintenance procedures for parks and open space, buildings and facilities, and vehicles and equipment and added these procedures to the SWMP
- Developed 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
- Completed a written program for MS4 infrastructure maintenance to reduce the discharge of pollutants
 - Developed 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

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 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:

While preparing SWPPPs for the Highway Garage and School Maintenance Garage, we performed a site inspection at the Water Department Garage to rule out the need for a SWPPP. During the site inspection on March 17, 2020, our consultant determined that activities on site will require a SWPPP. This SWPPP has

been drafted and all three SWPPPs will be finalized and rolled out to DPW staff in October 2020.

Annual Requirements

- Provided an opportunity for public participation in review and implementation of SWMP and complied with State Public Notice requirements
- Kept records relating to the permit available for 5 years and made available to the public
- The SSO inventory has been updated, including the status of mitigation and corrective measures implemented
 - This is not applicable because we do not have sanitary sewer
 - This is not applicable because we did not find any new SSOs
 - The updated SSO inventory is attached to the email submission
 - The updated SSO inventory can be found at the following website:
- Properly stored and disposed of catch basin cleanings and street sweepings so they did not discharge to receiving waters
- Provided training to employees involved in IDDE program within the reporting period
- All curbed roadways were swept at least once within the reporting period
- Updated outfall and interconnection inventory and priority ranking as needed

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:

See "COVID-19 Impacts" section at the end of this report.

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

Annual Requirements

*Public Education and Outreach**

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

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

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

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

Annual Requirements

*Public Education and Outreach**

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

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

Good Housekeeping and Pollution Prevention for Permittee Owned Operations

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

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:

See "COVID-19 Impacts" section at the end of this report.

Solids, Oil and Grease (Hydrocarbons), or Metals

Annual Requirements

Good Housekeeping and Pollution Prevention for Permittee Owned Operations

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

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

See "COVID-19 Impacts" section at the end of this report.

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

This Permit Year the Town implemented a new Stormwater Management Utility Fee that will provide a sustainable long-term funding source to be used for infrastructure operation and maintenance, capital improvements, MS4 permit compliance, and professional support to meet increasing stormwater demands. Town Meeting also voted to establish a Stormwater Utility Enterprise Fund to manage the new stormwater revenue. The new fee will raise an additional \$1 Million dollars to be used for the Town's stormwater management program.

Part III: Receiving Waters/Impaired Waters/TMDL

Have you made any changes to your lists of receiving waters, outfalls, or impairments since the NOI was submitted?

- Yes
 No

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

The impairments included in the Town's original NOI submission were based on the Massachusetts Year 2014 Integrated List of Waters approved on February 23, 2016. On January 2, 2020 the 2014 list was replaced with the approval of the Massachusetts Year 2016 Integrated List of Waters. The 2016 list include the following changes to Westford waterbodies:

Harmful Algal Blooms was added as an impairment to Nabnasset Pond (MA84044). Nabnasset Pond was also changed from a Category 4A waterbody to a Category 5 waterbody.

Escherichia Coli (E. Coli) was added as an impairment to Nashoba Brook (MA82B-14).

As a result of outfall investigations in Permit Year 2, there are 40 outfalls that will be removed from the inventory after final review by the GIS Coordinator; these outfalls were recategorized (BMP, culvert, private) or did not exist in the field. No outfalls were added. Forge Pond (MA84015) Tributary/Wetland will be removed from the list of Receiving Waters.

Part IV: Minimum Control Measures

Please fill out all of the metrics below. If applicable, include in the description who completed the task if completed by a third party.

MCM1: Public Education

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

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

BMP: Education and Outreach to Businesses & Commercial Facilities: Stormwater Management

Message Description and Distribution Method:

A stormwater management article was included in the Water Department's Fall 2019 Resource newsletter providing information on best management practices for commercial properties including: parking lots, fleet care, snow & ice removal, outdoor cleaning, landscaping & lawn care, and waste and material storage. The publication was mailed to every property address in the Town of Westford and was also used to meet public education requirements of Appendix F for the Assabet River phosphorus TMDL and Appendix H for waters impaired by bacteria/pathogens. This same article was also placed in the October 2019 Town Manager's Newsletter.

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

The Water Department newsletter is mailed to 8,700+ residential properties and 880+ businesses. 810 people subscribe to the Town Manager's Newsletter.

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 Industrial Facilities: Stormwater Management

Message Description and Distribution Method:

A stormwater management article was included in the Water Department's Spring 2020 Resource newsletter providing information on best management practices for industrial facilities including: chemical storage, waste and material storage, spill prevention & response, equipment maintenance, site landscaping, and permitting requirements. The publication was mailed to every property address in the Town of Westford and was also used to meet 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: Stormwater Matters Video

Message Description and Distribution Method:

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:Stormwater Management Information for Businesses

Message Description and Distribution Method:

A Think Blue Massachusetts stormwater management article was published in the May 2020 Town Manager's Newsletter about waste management for business and commercial properties in Westford. The article included the dos and don'ts for proper waste handling necessary to prevent pollutants from entering stormwater runoff and the natural resources.

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: Pet Waste Management

Message Description and Distribution Method:

A Dog Waste and Surface Water Quality brochure was given to all dog owners, either in person or by mail, that applied for a license (approx. 2,500 dogs). The brochure included information on why pet waste is harmful to the environment and provided guidance on how to properly collect and dispose of pet waste. Hard copies of the brochure were also made available to the general public at the Town Clerk's office in Town Hall. This brochure helps address the public education requirements of 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: Stormwater Exhibit at Farmers Market

Message Description and Distribution Method:

The Westford Engineering Department staffed an exhibit tent at the Farmers Market held at the Town Common. The exhibit included stormwater related educational materials, working storm drain model, and local infrastructure photos. Engineering Department staff were available to answer questions and discussed any stormwater related topics with the public.

Targeted Audience: Residents

Responsible Department/Parties: Engineering

Measurable Goal(s):

Approximately 250 residents attended the Farmers Market between 2:30 PM and 6:30 PM.

Message Date(s): August 20, 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:Educational and Outreach to Residents: Yard Waste

Message Description and Distribution Method:

An article on the proper disposal of fallen leaves and yard waste was included in the Water Department's Fall 2019 newsletter, October 2019 Town Manager's Newsletter, and posted on Facebook on October 22, 2019.

Targeted Audience: Residents

Responsible Department/Parties: Engineering

Measurable Goal(s):

The Water Department newsletter is mailed to 8,700+ residential properties and 880+ businesses, 810 people subscribe to the Town Manager's Newsletter, and the Town Facebook page has approx. 2,600 followers.

Message Date(s): various

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 Information Session

Message Description and Distribution Method:

The Westford Board of Health sponsored an information session for residents and realtors for on-site septic system care and maintenance. The session was advertised in the Health Department's annual newsletter that was mailed to all mailing addresses in Westford.

Targeted Audience: Residents

Responsible Department/Parties: Health Department

Measurable Goal(s):

Every mailing address in Town received the newsletter advertisement. Approximately 22 people attended the information session.

Message Date(s): November 14, 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:Resident Message - Stormwater pollution is trash, oil, cigarette butts, & dog waste.

Message Description and Distribution Method:

Think Blue Massachusetts "Fowl Water" video (<https://www.thinkbluemassachusetts.org/>)
Advertisement on Facebook & YouTube.

Targeted Audience: Residents

Responsible Department/Parties: Massachusetts Statewide Municipal Stormwater Coalition

Measurable Goal(s):

70,780 social media impressions from residents of Westford, over 1.2 Million within Northern Middlesex Stormwater Collaborative region, and over 7 Million impressions across Massachusetts

Message Date(s): July 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:Resident Message - Stormwater pollution is trash, oil, cigarette butts, & dog waste.

Message Description and Distribution Method:

Think Blue Massachusetts "Fowl Water" video (<https://www.thinkbluemassachusetts.org/>)
Advertisement on Facebook & YouTube.

Targeted Audience: Residents

Responsible Department/Parties: Massachusetts Statewide Municipal Stormwater Coalition

Measurable Goal(s):

70,516 social media impressions from residents of Westford, over 1.2 Million within Northern Middlesex Stormwater Collaborative region, and over 13 Million impressions across Massachusetts

Message Date(s): June 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:

BMP:Annual message - Proper lawn maintenance

Message Description and Distribution Method:

Think Blue Massachusetts shared posts on Facebook in the spring encouraging the proper use and disposal of grass clippings and encouraged the proper use of slow-release fertilizers.

Targeted Audience: Businesses, institutions and commercial facilities; Residents

Responsible Department/Parties: Engineering / NMSC

Measurable Goal(s):

The Think Blue Massachusetts Facebook account has approximately 300 followers and averages approximately 3,000 reaches per month.

Message Date(s): November 1, 2019; April 28 & 30, 2020; May 14 & 22, 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:

BMP:Annual leaf litter message - Leaf litter & brush collection

Message Description and Distribution Method:

Think Blue Massachusetts shared posts on Facebook in fall to encourage proper disposal of leaf litter.

Targeted Audience: Residents

Responsible Department/Parties: Engineering / NMSC

Measurable Goal(s):

The Think Blue Massachusetts Facebook account has approximately 300 followers and averages approximately 3,000 reaches per month.

Message Date(s): September 26 & 27, 2020; October 1, 8, & 11, 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:

BMP:Annual pet waste message - Scoop the Poop

Message Description and Distribution Method:

Think Blue Massachusetts shared posts on Facebook in summer to encourage the proper management of pet waste.

Targeted Audience: Residents

Responsible Department/Parties: Engineering / NMSC

Measurable Goal(s):

The Think Blue Massachusetts Facebook account has approximately 300 followers and averages approximately 3,000 reaches per month.

Message Date(s): July 17, 2019; August 14, 2019; April 9, 14, & 16, 2020; May 13, 18, 28 & 29, 2020; June 2, 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:

BMP:Annual septic maintenance message

Message Description and Distribution Method:

Think Blue Massachusetts shared posts on Facebook regarding Septic Smart week to provide information to owners of septic systems about proper maintenance.

Targeted Audience: Residents

Responsible Department/Parties: Engineering / NMSC

Measurable Goal(s):

The Think Blue Massachusetts Facebook account has approximately 300 followers and averages approximately 3,000 reaches per month.

Message Date(s): September 16, 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:Annual winter deicing/salt message

Message Description and Distribution Method:

Think Blue Massachusetts shared posts on Facebook regarding road salt application for residential, commercial, & industrial site owners on the proper storage and application rates of winter deicing material

Targeted Audience: Businesses, institutions and commercial facilities; Industrial; Residential

Responsible Department/Parties: Engineering / NMSC

Measurable Goal(s):

The Think Blue Massachusetts Facebook account has approximately 300 followers and averages approximately 3,000 reaches per month.

Message Date(s): November 14, 2019; December 5, 9, 13, 17, 18, 16, & 24, 2019; January 7, 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:

BMP:Stormwater Management Utility Fee Education

Message Description and Distribution Method:

The Select Board recorded a 15-minute long video presentation for public education on two Stormwater Management Utility Fee related articles included on the October 28, 2019 Special Town Meeting (STM) warrant. The presentation provided the audience with an overview on the importance of effective stormwater management and the need for a long term, sustainable funding source to operate and maintain Westford’s stormwater program. The video was played at Special Town Meeting and was also made available for on-demand viewing through WestfordCAT and YouTube.

A FAQ bill stuffer entitled “New Stormwater Management Utility Fee and Credit Policy” was included with all real estate and personal property tax bills mailed in December 2019 and June 2020. The FAQ included information on stormwater impacts, revenue requirements to support stormwater needs in Westford, as well as other information related to the new Stormwater Management Utility Fee.

Targeted Audience: All Property Owners

Responsible Department/Parties: Select Board & Tax Collector

Measurable Goal(s):

Approx. 343 voters watched the Select Board video presentation at STM. The video was also viewed online more than 360 times. The FAQ bill stuffer was mailed with approximately 8,800 real estate tax and personal property tax bills on two different occasions during the permit year.

Message Date(s): October 2019, December 2019, and June 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:

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:**

Westford's Stormwater Program was discussed at Select Board meetings on 7/23/19, 8/27/19, 9/10/19, 9/24/19, 10/15/19, 2/11/20 and at the 6/1/20 Planning Board meeting. All Select Board and Planning Board

meetings were advertised in accordance with public meeting laws. The meetings were also televised live on WestfordCAT and the recorded broadcasts were made available for on-demand viewing through WestfordCAT's website.

On 8/16/19 the Town held a stormwater roundtable discussion led by the Town Manager that included local, state, and federal government officials. The discussion was held at Westford Town Hall and was open to the public. The stormwater related topics discussed included: preserving and improving water quality, infrastructure maintenance & improvements, MS4 permit compliance, and identifying sustainable funding strategies. The roundtable discussion was broadcast on WestfordCAT and was made available for on-demand viewing.

A stormwater lunch and learn was held at the Westford Council on Aging (COA) on 9/27/19. The event included general discussions on stormwater, stormwater related infrastructure, and the costs associated with the Town's stormwater program. The event was advertised at the Westford Senior Center and in the COA's September 2019 newsletter.

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. The plan is also posted on the Town's website complete with instructions on how the public can provide comments or input on the plan.

The Town's Stormwater Management Plan and Stormwater Master Plan were made available for review on the Town's website.

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:**

Various stormwater related articles were discussed and approved at Special Town Meeting on 10/28/19. A \$1,250,000 Stormwater Enterprise Fund operating budget was discussed and approved at Annual Town Meeting on 6/20/20.

The Town hosts regular clean up and recycling events throughout the Permit Year. Electronics drop-off days were held on 9/7/19 and 5/2/20 and brush chipping was held on 10/19/19 and 4/25/20. Disposal of yard waste and leaf litter pickup was available to residents for a small fee on 11/8/19 and 12/7/19. Other options for proper yard waste disposal were advertised on the Town's website.

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 Town Manager presented at the 6th Annual Town Managers Meeting sponsored by the Westford Business Association on 3/4/20. Stormwater was one of the topics included in the presentation.

MCM3: Illicit Discharge Detection and Elimination (IDDE)

Sanitary Sewer Overflows (SSOs)

Check off the box below if the statement is true.

- This SSO section is NOT applicable because we DO NOT have sanitary sewer

Below, report on the number of SSOs identified in the MS4 system and removed **during this reporting period**.

Number of SSOs identified:

Number of SSOs removed:

MS4 System Mapping

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

Optional: 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.

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

www.westfordma.gov/stormwater

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:

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, and therefore catchment investigations for high and low priority catchments will begin after dry weather screening is complete.

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:

No illicit discharges were found during Permit Year 2

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:

No illicit discharges were found during Permit Year 2

Employee Training

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

The Westford Highway Department hosted a Water Quality Test Kit training session sponsored by the Northern Middlesex Stormwater Collaborative on 8/14/19. Engineering Department staff participated in the Central Massachusetts Regional Stormwater Coalition IDDE Training Workshop on May 5, 2020. Highway Department staff received a hard copy of an IDDE training handout in June 2020. Highway and Water Department staff attended an IDDE Program Refresher event on 6/30/20 that included a video presentation prepared by the Town's stormwater consultant followed by a Q&A session with the Westford Engineering Department.

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:

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

There were a few occasions during the permit year where the Engineering Department directed increased maintenance on erosion control devices and the implementation of additional erosion control measures to prevent the discharge of pollutants from active construction sites. All sites were able to address any noted deficiencies in a timely manner; therefore, no formal enforcement actions were necessary.

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

Ordinance or Regulatory Mechanism

Below, select the option that describes your ordinance or regulatory mechanism progress.

- Bylaw, ordinance, or regulations are updated and adopted consistent with permit requirements
- Bylaw, ordinance, or regulations are updated consistent with permit requirements but are not yet adopted
- Bylaw, ordinance, or regulations have not been updated or adopted

As-built Drawings

Describe 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:

Westford Planning Board Rules & Regulations for Stormwater Management Permits require submission of as-built drawings as part of the permitting process. The regulations also require a Maintenance Agreement to be recorded at the Registry of Deeds that requires long term operation and maintenance be conducted in perpetuity by the property owner.

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 Lots assessment will be completed in year 4.

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 prepared in year 4.

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 complete retrofit properties inventory will be completed in year 4. The Town did however complete a retrofit construction project at Forge Pond Beach. The project included reconstructing the existing parking lot which was located directly adjacent to both Forge Pond and the banks of Stony Brook. The impervious parking area was reduced in size and reconfigured to provide greater setbacks to the adjacent pond and brook and to reduce stormwater runoff. The project also included the construction of a bioretention area designed to treat and recharge stormwater runoff collected from the parking lot prior to discharging into Stony Brook.

MCM6: Good Housekeeping**Catch Basin Cleaning**

*Below, report on the number of catch basins inspected and cleaned, along with the total volume of material removed from the catch basins **during this reporting period.***

Number of catch basins inspected:

Number of catch basins cleaned:

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

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

Total number of catch basins:

If applicable:

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

The town will continue to track the sediment depth within catch basins using our electronic tablet application and GIS. Any catch basin more than 50% full during two consecutive route inspections or cleaning events will be further investigated.

Street Sweeping

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

- Number of miles cleaned:
- Volume of material removed:
- Weight of material removed:

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

Stormwater Pollution Prevention Plan (SWPPP)

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

Number of site inspections completed:

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

A covered dumpster was added at the Westford Department of Public Works facility.

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):

www.westfordma.gov/stormwater

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:

An annual report on the 2019 Post-Treatment Management Program for several of Westford's ponds was prepared. The report included water quality sampling results at seven different ponds.

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 participated in the Northern Middlesex Stormwater Collaborative (NMSC) "Capacity Building for Local Oversight of Development and Redevelopment Projects" project funded through a 2019-2020 MS4 Municipal Assistance Grant. Through this project, the Town plans to use the model Regulations to update the Planning Board Stormwater Management Regulations in Permit Year 3 to meet the revised post-construction requirements as well as the online Guidance and Mapping Tool for Watershed-Based Requirements.

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:

A combination of COVID-19 related staffing impacts and unanticipated mechanical/equipment issues prevented the town from completing the required catch basin cleaning and street sweeping programs in Permit Year 2.

Repairs and maintenance of the Town's Catch Basin cleaning equipment could not be completed due to a parts shortage caused by the pandemic. The Town's street sweeper suffered unexpected mechanical failures which required an unplanned purchase of a new replacement sweeper. The new sweeper was purchased in May 2020 and sweeping activities resumed in early June 2020. All Town owned streets will be swept before the end of 2020. Overall DPW operations were also significantly disrupted by the pandemic.

Funding has been allocated in the Town's FY21 Stormwater Enterprise Fund budget to hire outside contractors to clean and inspect all Town owned catch basins and to supplement the Town's street sweeping program to meet Permit Year 3 requirements. Public bids for catch basin cleaning services were received on September 16, 2020 and the Town anticipates receiving public bids for street sweeping services in December 2020.

In 2020 the Town formally established a Department of Public Works (DPW). The purpose of creating a DPW was to maximize the use of available Town resources, reduce redundancies, identify opportunities for cost savings, and overall to create an organizational structure that is better suited to meeting public works needs including increasing demands related to stormwater management.

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

- Inspect all outfalls/ interconnections (excluding Problem and Excluded outfalls) for the presence of dry weather flow
- Complete follow-up ranking as dry weather screening becomes available

Annual Requirements

- Annual report submitted and available to the public
- Annual opportunity for public participation in review and implementation of SWMP
- Keep records relating to the permit available for 5 years and make available to the public
- Properly store and dispose of catch basin cleanings and street sweepings so they do not discharge to receiving waters
- Annual training to employees involved in IDDE program
- Update inventory of all known locations where SSOs have discharged to the MS4
- Continue public education and outreach program
- Update outfall and interconnection inventory and priority ranking and include data collected in connection with the dry weather screening and other relevant inspections conducted
- Implement IDDE program
- Review site plans of construction sites as part of the construction stormwater runoff control program
- Conduct site inspection of construction sites as necessary
- Inspect and maintain stormwater treatment structures
- Log catch basins cleaned or inspected
- Sweep all uncurbed streets at least annually
- Continue investigations of catchments associated with Problem Outfalls
- Review inventory of all permittee owned facilities in the categories of parks and open space, buildings and facilities, and vehicles and equipment; update if necessary

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

The Town acknowledges the General Permit Year 3 requirements and will complete as many activities as possible based on funding and staff availability. The Town will be entering into a contract with our stormwater consultant to provide professional engineering services for work related to Permit Year 3 compliance. The recently established Stormwater Management Utility Fee and Enterprise Fund will be used as a resource to address general stormwater related needs and Permit Year 3 requirements.

Part V: 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:

Title:

Signature:

Date:

[Signatory may be a duly authorized representative]