

Year 3 Annual Report
Massachusetts Small MS4 General Permit
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. 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 3 Requirements

- Inspected and screened all outfalls/interconnections (excluding Problem and Excluded outfalls)
- Updated outfall/interconnection priority ranking based on the information collected during the dry weather inspections as necessary
- Post-construction bylaw, ordinance, or other regulatory mechanism was updated and adopted consistent with permit requirements

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
- 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 system map due in year 2 as necessary
- Enclosed all road salt storage piles or facilities and implemented winter road maintenance procedures to minimize the use of road salt
- Implemented SWPPPs for all permittee owned or operated maintenance garages, public works yards, transfer stations, and other waste handling facilities
- Updated inventory of all permittee owned facilities as necessary
- O&M programs for all permittee owned facilities have been completed and updated as necessary
- Implemented all maintenance procedures for permittee owned facilities in accordance with O&M programs
- Implemented program for MS4 infrastructure maintenance to reduce the discharge of pollutants
- Inspected all permittee owned treatment structures (excluding catch basins)

Optional: If you would like to describe progress made on any incomplete requirements listed above, 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:

The Town is still feeling some of the effects of the COVID-19 impacts from the previous year. The inspections of all Town owned BMPs began in Permit Year 3 however they were not completed due to limited staff availability. A significant amount of staff time was focused on completing other deferred DPW operations and maintenance work in Permit Year 3 that could not be completed in the prior year. The Town did begin the Year 3 inspections of Town owned treatment structures in June 2021 and was also able to clean some Town-owned water quality structures between June 30 and 31, 2021 using a contracted vector truck. All Town owned treatment structures were inspected during Permit Year 2 and the Town will continue to inspect all treatment structures before the end of Permit Year 4.

The Town is working toward implementation of all maintenance procedures for all permittee owned facilities in accordance with the Operation & Maintenance Plan (SWMMP Volume 3). The DPW coordinates these activities through the efforts of multiple departments. Implementation of SOPs has improved since the permit effective date.

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:

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:

All Town owned streets and parking lots were swept a minimum of two times in Permit Year 3. The Westford Highway Department swept in the fall of 2020 and sweeping in the spring of 2021 was performed by a hired contractor. Additional sweeping was also performed where necessary throughout the permit year.

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?

- 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 3, 97 outfalls and interconnections will be removed from the inventory after final review by the GIS Coordinator; these outfalls were recategorized (BMP, culvert, private, MassDOT) or did not exist in the field. Four (4) outfalls and five (5) interconnections were added. The updated outfall inventory (see Part IV MCM 3) now contains 517 outfalls and interconnections in the MS4; updated receiving waters are included in the inventory.

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 Residents: Household Chemicals

Message Description and Distribution Method:

An article was included in the Water Department's Spring 2021 Resource newsletter providing information on the use and disposal of household chemicals.

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

The Water Department newsletter is mailed to all residential and commercial properties in Westford (8,700+ residential properties and 880+ businesses). The newsletter is also available for viewing and download through the Water Department's website.

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: Fowl Water Video

Message Description and Distribution Method:

On behalf of the members of the Northern Middlesex Stormwater Collaborative, Think Blue Massachusetts ran an educational advertising campaign from May 17th to July 4th, 2021 through Facebook and Instagram. The "Fowl Water" advertisement video was used to help viewers visualize how motor oil, pet waste, and trash becomes stormwater pollution.

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

Approximately 38,781 total impressions in Westford

Message Date(s): May 17th to July 4th, 2021

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 & Annual Message: Pet Waste Management

Message Description and Distribution Method:

A pet waste flyer was given to all dog owners, either in person or by mail, that applied for a license (approx. 2,000 dogs). The flyer included the do's and don'ts of managing pet waste and the harmful impacts if not disposed of properly. Social media posts were also made regarding pet waste disposal on August 6, 2020 through the Town's website, Facebook, and Twitter accounts.

Targeted Audience: Residents

Responsible Department/Parties: Engineering

Measurable Goal(s):

All dog owners received the flyer in this Permit Year. Additional flyers were also made available at Town Hall for visitors. Approximately 867 Town website subscribers, 1,974 Twitter followers, and approximately 300-600 Facebook users were able to view the social media posts.

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 & Annual Message: Lawn Care and Yard Waste

Message Description and Distribution Method:

A healthy yard article was published in the May 2021 Town Manager's Newsletter comparing the benefits of taking an organic approach to lawn care including a comparison of the impacts of commercial fertilizers. An article on how to properly get rid of fallen leaves and yard waste was published in the October 2020 Town Manager's Newsletter. An article on leaves and yard waste was published in the Water Department's Fall 2020 newsletter. The article focused on the proper management of leaves and yard waste in the fall season. The Town organized two leaf collection days on November 7 & December 5, 2020 which was publicized through the Town's website. Leaf pickup was offered by Acme Waste Systems at per bag charge. Proper lawn care information was also posted to the Town's Facebook account on May 12, 2021. The post focused on ways to keep your grass green but not our lakes and streams.

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

The Water Department newsletter is mailed to all residential and commercial properties in Westford (8,700+ residential properties and 880+ businesses). There are 867 subscribers to the Town's main website news feed where the Town Manager's Newsletter can be accessed and the Town has 1,974 Twitter followers.

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: Septic System & Well Seminar for Realtors

Message Description and Distribution Method:

A Westford Realtor Webinar was hosted by the Westford Health Department that included a presentation on septic systems and private wells. The webinar also included a Q&A session with the Health, Water, and Fire Departments. Relevant handouts were also made available through the webinar. The webinar advertisement was emailed to all local Realtors and was also publicized on the Westford Health Department's Facebook account.

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

Approximately 26 Realtors attended the virtual event. By training Realtors, lessons learned about septic systems and private wells are applied to various properties sold and knowledge shared with buyers and sellers.

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: Annual Septic Maintenance Message

Message Description and Distribution Method:

EPA's Septic Smart Week was advertised on the Westford Health Department's Facebook account on September 14, 2020 which included a link to a septic system educational graphic. EPA's "Do Your Part Be

SepticSmart" graphic was published in the Town Manager's September 2020 Newsletter. EPA's SepticSmart "Top 10 Ways to Be a Good Septic Owner" was published in the Water Department's Spring 2021 Resource Newsletter.

Targeted Audience: Residents; Businesses, institutions and commercial facilities

Responsible Department/Parties: Health Department & Water Department

Measurable Goal(s):

The Westford Health Department had approximately 978 followers on September 14, 2020. There are 867 subscribers to the Town's main website news feed where the Town Manager's Newsletter can be accessed. The Water Department newsletter is mailed to all residential and commercial properties in Westford (8,700+ residential properties and 880+ businesses). The newsletter is also available for viewing and download through the Water Department's website.

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: Town-wide Catch Basin Cleaning

Message Description and Distribution Method:

A post was made to the Town's website and to Town's Facebook account to notify the public of the Town's on-going catch basin cleaning operations. The post included information on reasons why our catch basins need to be cleaned each year.

Targeted Audience: Residents

Responsible Department/Parties: Engineering

Measurable Goal(s):

The Town has 867 subscribers to the main news feed on the Town's website and it is estimated that between 300 - 600 people see the 'popular' posts on the Town's Facebook account.

Message Date(s): March 12, 2021

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: Town-wide Street Sweeping

Message Description and Distribution Method:

A post was made to the Town's website & Town's Facebook account and was also published in the Town Manager's May 2020 Newsletter. The posts notified the public of the Town's on-going street sweeping operations. The post included information on reasons why our streets need to be swept each year.

Targeted Audience: Residents

Responsible Department/Parties: Engineering

Measurable Goal(s):

The Town has 867 subscribers to the main news feed on the Town's website and it is estimated that between 300 - 600 people see the 'popular' posts on the Town's Facebook account.

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:

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:**

Stormwater Management was discussed at the Planning Board meetings on June 7 & 21, 2021 and at the September 22, 2020 Select Board meeting. All meetings were advertised in accordance with public meeting laws. The meetings were also televised on WestfordCAT and the recorded broadcasts were made available for on-demand viewing through the WestfordCAT website.

A hard copy of the Town's NPDES Stormwater Program Compliance Plan was made available at the Westford 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.

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:**

Annual Town meeting was held on June 12, 2021 and included votes on stormwater related capital projects and on the Stormwater Enterprise Fund annual operating budget. Town Meeting gave the opportunity to any resident to ask questions or initiate a discussion on the stormwater related projects and different stormwater related expenses. The Westford Finance Committee prepared a Report and Recommendations publication that was mailed to all residents which provided supporting information for Annual Town Meeting articles.

The Town hosted regular clean up and recycling events throughout Permit Year 3. Electronics drop-off days were held on September 19 and November 14, 2020 and brush chipping was held on October 7, 2020 and April 24, 2021. Disposal of yard waste and leaf litter pickup was available to residents for a small fee on November 7 and December 5, 2020. A Hazardous Waste Collection day was held at the Westford DPW on May 8, 2021.

The Town Manager made a presentation at the 7th Annual Town Managers Meeting on March 10, 2021. One of the topics of the presentation was stormwater. The presentation was made available for viewing on-line on YouTube.

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

Optional: Provide additional status information regarding your map:

Annual Town Meeting approved the hiring of an additional staff engineer in Permit Year 4. One of the focuses of the new staff position will be to advance and improve the mapping of the Town owned drainage and stormwater infrastructure.

The Town continues to refine the MS4 GIS mapping and data collection as the IDDE Program and catch basin inspection/cleaning program is implemented and field investigations are completed. The Town will continue to update our MS4 system mapping in Permit Year 4.

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:

In Permit Year 3, the Town and their stormwater consultant completed outfall and interconnection investigations for locations that had not been visited in previous permit years. All 517 known MS4 outfalls and interconnections have been successfully screened to date.

The summary report for outfall inventory and dry weather screening can be viewed at www.westfordma.gov/stormwater.

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:

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

The Town has not identified any problem catchments to date, therefore catchment investigations for high and low priority catchments were not completed in Year 3. The Town has contracted with our stormwater consultant to begin performing catchment investigations for high priority catchments in Year 4.

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:

No illicit discharges were found in Permit Year 3.

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

Number of illicit discharges identified: Number of illicit discharges removed: Estimated volume of sewage removed: gallons/day

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

Total number of illicit discharges identified: Total number of illicit discharges removed:

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

A tablet application was used to record the annual catch basin cleaning activities. One of the inspection fields was for the potential presence of any illicit connections or suspicious discharges. There were 41 catch basins that were flagged for potential illicit discharges that required a follow-up inspection. Follow-up inspections were performed by the Westford Engineering Department. The majority of catch basins flagged were because of the presence of small diameter pipes that were later determined to be associated with road under-drains, sump pumps, or foundation drains. Only one of the locations reviewed required a second follow-up inspection which was later determined not to be an illicit discharge. Overall there were no illicit discharges identified in Permit Year 3.

Employee Training

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

The Westford Engineering Department attended a Municipal Good Housekeeping and Pollution Prevention webinar on April 27, 2021 that was sponsored by the Northern Middlesex Stormwater Collaborative.

The Westford Highway Department and Water Department staff attended a Good Housekeeping and Pollution Prevention Overview Training and IDDE Program Refresher Training on June 29, 2021.

The Engineering, Water, and School Departments received Stormwater Pollution Prevention Plan (SWPPP) inspection training on March 30, 2021.

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 matter; therefore, no formal enforcement actions were taken.

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

As-built Drawings

Below, report on the number of as-built drawings received during this reporting period.

Number of as-built drawings received:

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

The timeline to submit As-Built Record Drawings, specified within the Town's Stormwater Management Permit regulations, was updated during Permit Year 3 to require the submission of as-built drawings following the completion of a project but no later than two (2) years after the completion of construction.

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 Town has contracted with our stormwater consultant to complete the Street Design and Parking Lots Report during Permit 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 Town has contracted with our stormwater consultant to complete the Green Infrastructure Report during Permit 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 Town has contracted with our stormwater consultant to complete the Retrofit Properties Inventory during Permit Year 4.

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 contracted out the cleaning & inspection of all Town owned catch basins in Permit Year 3. Approximately 60 catch basins could not be cleaned due to access reasons. The Westford Highway Department visited each of these individual locations to determine potential action needed to make the structures accessible for future cleaning.

The material removed from catch basins is currently stockpiled in the DPW yard and has not yet been disposed. The 277 cubic yards referenced above is an estimated quantity based on the approximate dimensions of the existing stockpile. It is the DPW's intent to remove and dispose of the stockpile this fall.

A total of 261 catch basins (<8% of the total) were estimated to be more than 50% full when cleaned during Permit Year 3. It is the Town's intention to clean all Town owned catch basins again in Permit Year 4 in order to establish more baseline data to better inform the Highway Department on the frequency required to keep all Town owned catch basins less than 50% full.

The total number of catch basins in the MS4 system was inaccurately reported as 2,813 in the annual report for Permit Year 2. The estimated total number of catch basins is 3,347 which was calculated based on available GIS data and data collected during the catch basin cleaning & inspection program.

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: [Select Units]
- Weight of material removed: [Select Units]

Stormwater Pollution Prevention Plan (SWPPP)

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

Number of site inspections completed:

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

A key recommendation in the SWPPP for the Highway Garage Facility was to develop a Spill Prevention, Control and Countermeasure Plan (SPCC). The Town with their consultants performed an additional site visit at that facility on June 14, 2021. The SPCC Plan was drafted for review in Permit Year 3. It was certified in August 2021.

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 continued membership and participation in the Northern Middlesex Stormwater Collaborative

(NMSC). The NMSC provided opportunities to share ideas and resources with other communities to address stormwater management issues and achieve MS4 compliance.

In June of 2021, the Engineering Department worked with the Planning Board to update the Town's stormwater management regulations. The updated requirements included: using Low Impact Development (LID) site planning and design strategies to the maximum extent feasible, stormwater management systems to be designed to be consistent with or more stringent than the Massachusetts Stormwater Handbook, and require new and redevelopment projects meet EPA's standards for retaining runoff and/or increased treatment standards for total suspended solids and total phosphorus.

A Town-wide culvert assessment was completed in Permit Year 3 which included individual field inspections of approximately 215 culverts. The purpose of the assessment was to assist the Town in prioritizing culvert maintenance and replacements as well as to establish a long-term asset management program to more efficiently manage Town owned culverts.

Permit Year 3 was the first year that properties in Westford were billed a stormwater fee through the Stormwater Enterprise Fund. The fees were based on the amount of impervious area within a parcel. Visit our website for detailed information (<https://www.westfordma.gov/1351/Stormwater-Billing>). The fees collected were used in Permit Year 3 for: contracting out catch basin cleaning and street sweeping, capital improvements, drainage maintenance & repairs, testing, personnel, and general MS4 compliance.

Permit Year 3 was also the first year under the newly established Department of Public Works (DPW). The DPW organizational structure allows for improved public works operations and efficiencies that allow more focus and resources directed toward stormwater management.

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:

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

- Develop a report assessing current street design and parking lot guidelines and other local requirements within the municipality that affect the creation of impervious cover
- Develop a report assessing existing local regulations to determine the feasibility of making green infrastructure practices allowable when appropriate site conditions exist

- Identify a minimum of 5 permittee-owned properties that could potentially be modified or retrofitted with BMPs to reduce impervious areas

Annual Requirements

- Annual report submitted and available to the public
- Annual opportunity for public participation in review and implementation of SWMP
- Keep records relating to the permit available for 5 years and make available to the public
- Properly store and dispose of catch basin cleanings and street sweepings so they do not discharge to receiving waters
- Annual training to employees involved in IDDE program
- Update inventory of all known locations where SSOs have discharged to the MS4
- Continue public education and outreach program
- Update outfall and interconnection inventory and priority ranking and include data collected in connection with the dry weather screening and other relevant inspections conducted
- Implement IDDE program
- Review site plans of construction sites as part of the construction stormwater runoff control program
- Conduct site inspection of construction sites as necessary
- Inspect and maintain stormwater treatment structures
- Log catch basins cleaned or inspected
- Sweep all curbed streets at least annually
- Continue investigations of catchments associated with Problem Outfalls
- Implemented SWPPPs for all permittee owned or operated maintenance garages, public works yards, transfer stations, and other waste handling facilities
- Review inventory of all permittee owned facilities in the categories of parks and open space, buildings and facilities, and vehicles and equipment; update if necessary
- Review O&M programs for all permittee owned facilities; update if necessary
- Implement all maintenance procedures for permittee owned facilities in accordance with O&M programs
- Implement program for MS4 infrastructure maintenance to reduce the discharge of pollutants
- Enclose all road salt storage piles or facilities and implemented winter road maintenance procedures to minimize the use of road salt
- Review as-built drawings for new and redevelopment to ensure compliance with post construction bylaws, regulations, or regulatory mechanism consistent with permit requirements
- Inspect all permittee owned treatment structures (excluding catch basins)

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

The Town acknowledges the General Permit Year 4 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 4 compliance. Our Stormwater Management Utility Fee and Enterprise Fund will be used as a resource to address general stormwater related needs and Permit Year 4 requirements.

Part V: 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: Title:

Signature: Date:

[Signatory may be a duly authorized representative]