

Year 4 Annual Report
Massachusetts Small MS4 General Permit
Reporting Period: July 1, 2021-June 30, 2022

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, 2021 and June 30, 2022 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 4 Requirements

Developed a report assessing current street design and parking lot guidelines and other local requirements within the municipality that affect the creation of impervious cover, made it available as part of the SWMP, and:

- No updates were recommended
- Updates were recommended. The anticipated date or date of completion for updates is/was:

Modifications to Subdivision Regulations by July 2025 and the Zoning Bylaw by July 2026.

Developed a report assessing local regulations to determine the feasibility of making green infrastructure practices allowable when appropriate site conditions exist, made it available as part of the SWMP, and:

- No updates were recommended
- Updates were recommended. The anticipated date or date of completion for updates is/was:

Modifications to Subdivision Regulations by July 2025 and the Zoning Bylaw by July 2026.

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

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

A report assessing current street design & parking lot guidelines and feasibility of allowing green infrastructure was completed in Permit Year 4.

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:
- Updated system map due in year 2 as necessary
- Provided training to employees involved in IDDE program within the reporting period
- Properly stored and disposed of catch basin cleanings and street sweepings so they did not discharge to receiving waters
- All curbed roadways were swept at least once within the reporting period
- 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 or provide any additional details, please use the box below:

The Town is constantly striving for full implementation of all maintenance procedures at Town facilities in accordance with the Operation & Maintenance Plan (SWMMP Volume 3). The DPW coordinates these activities through the efforts of multiple departments.

The Town was unable to inspect all of the Town owned treatment structures during Permit Year 4 due to staffing shortages. The Town will continue to inspect these treatment structures throughout Permit Year 5. Note that a significant effort to inspect most Town BMPs was conducted in Year 3 by an employee that is no longer working for the Town.

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:

All Town owned streets and parking lots were swept a minimum of two times in Permit Year 4. The Westford Highway Department swept in the fall of 2021 and sweeping in the spring of 2022 was performed by a hired contractor. Additional sweeping was also performed as necessary throughout the permit year.

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
 - The street sweeping schedule is attached to the email submission
 - The street sweeping schedule can be found at the following website:

- ☒ 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:

Several roads in the vicinity of a local quarry operation located on North Main Street are swept approximately every two weeks during the construction season. No other target areas have been identified with higher pollutant loads and the "sweeping schedule" is to sweep roadways within the Stony Brook and Deep Brook watersheds in the spring and fall.

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:

Westford's NOI listed water quality impairments and TMDLs for the Town's receiving waters based on the 2014 303(d) List. In Permit Year 2, the Town evaluated changes to the impairments and/or receiving waters based on the final 2016 303(d) List and the analysis was submitted with the Town's Permit Year 2 Annual Report and is available in the Town's SWMP.

In Permit Year 4, the Town evaluated any changes to the impairments and/or receiving waters based on the final 2018/2020 303(d) List and the analysis is posted on the Town website. The changes described do not add, remove, or change any receiving waters or applicable General Permit requirements.

During catchment investigations, no outfalls were added to or removed from the Town's drainage system mapping during Permit Year 4.

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 Industrial Properties: Industrial Best Management Practices

Message Description and Distribution Method:

A direct mailing was sent to all developed industrial properties in Westford. The mailing included a letter from the DPW identifying typical pollutants and their impacts on the environment as well as a flyer with best practices to prevent stormwater pollution at industrial properties. The flyer also included information about EPA's Multi-Section General Permit (MSGP).

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 & Outreach to Commercial Properties: Dumpsters & Stormwater Pollution

Message Description and Distribution Method:

An article was included in the Water Department's Fall 2021 newsletter providing information on the proper use of dumpsters.

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

residential properties and 880+ businesses). The newsletter is also available for viewing and download through the Water Department's website.

Message Date(s): Fall 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: NMSC Educational Advertisement Campaign

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 31st to June 17th, 2022. The "Fowl Water" (In both English and Spanish) video helps viewers visualize stormwater pollution.

Targeted Audience: Residents

Responsible Department/Parties: Engineering

Measurable Goal(s):

Approximately 24,213 total impressions (Facebook & YouTube) in Westford.

Message Date(s): May 31 to June 17, 2022

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 & Yard Waste

Message Description and Distribution Method:

Articles were included in the Water Department's fall and spring newsletters and Town Manager's October 2021 newsletter on how to properly manage leaves, lawn clippings, yard waste, and fertilizer. The Town Manager's May 2022 newsletter also included the Think Blue Massachusetts "Lawn and Garden Tips to Help Curb Stormwater Pollution" infographic. A Spring Yard Clean Up & Lawn Applications article was also posted on the Town website on April 29, 2022.

Targeted Audience: Residents

Responsible Department/Parties: Engineering

Measurable Goal(s):

The Water Department newsletter is mailed to all residential and commercial properties in Westford (8,700+ residential properties and 880+ businesses). Both newsletters are also available for viewing and download through the Town's website. The Main News feed on the Town website has approximately 872 subscribers that were notified when the newsletter and articles were posted.

Message Date(s): Fall 2022, Spring 2022, October 2021 & May 2022, April 29, 2022

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 Dog Owner's Guide to Waste Disposal and Water Quality was given to all dog owners, either in person or by mail, that applied for a license (approx. 2,000 dogs). The brochure included the potential harmful impacts to water quality if dog waste is not disposed of properly. Social media posts were also made regarding pet waste disposal on July 30, 2021 through the Town's website and Facebook account. A "Pet Waste and Bathing Beaches" article was included in the August 2021 Town Manager's Newsletter. The article outlined potential health risks associated with pet waste and tips to protect the shoreline.

Targeted Audience: Residents

Responsible Department/Parties: Engineering

Measurable Goal(s):

All licensed dog owners received the brochure in this Permit Year. Additional brochures were also made available at Town Hall for visitors. Approximately 872 Town website subscribers and 3,100 Facebook followers were notified when the messages were posted.

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: Annual Septic System Maintenance Message

Message Description and Distribution Method:

Septic System Care articles were posted on the Town website and on the Town's Facebook account. The articles included information on proper system maintenance and tips to help extend the life of septic systems. EPA's "Do Your Part. Be SepticSmart" infographic was included as part of each article.

Targeted Audience: Residents; Businesses, Institutions, and Commercial Facilities

Responsible Department/Parties: Health Department

Measurable Goal(s):

Approximately 872 subscribers to the Town's website and 3,100 followers for the Town Facebook account.

Message Date(s): July 30, 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 Catch Basin Cleaning

Message Description and Distribution Method:

A post was made to the Town's website and to the Town's Facebook account to notify the public of the DPW's on-going catch basin cleaning operations.

Targeted Audience: Residents

Responsible Department/Parties: Engineering

Measurable Goal(s):

The Town has 872 subscribers to the Main News feed on the Town's website and 3,100 Facebook followers.

Message Date(s): May 4, 2022

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:**

The Stormwater Management Program as related to the stormwater fee was discussed at the Select Board meeting on April 27, 2021. All Select Board meetings are advertised in accordance with public meeting laws. The Select Board meetings are also televised on WestfordCAT and the recorded broadcasts are 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:**

On Saturday May 14, 2022 from 9am-1pm, the Westford Recycling Commission held a Household Hazardous Waste (HHW) collection at the Westford Highway Department (28 North Street) for residents only.

Westford Climate Action sponsored Westford Earth Month in April 2022 (<https://westfordclimateaction.org/earth-month/>) with events for adults and children. "Westford Earth Month is a series of events occurring in Westford, Massachusetts throughout April. It expands on the tradition of Earth Day. Given the climate crisis, we need more attention and activism than ever." The festival and events included lessons on weather and climate, a presentation on climate resiliency, a forum on Westford's Climate Roadmap, an Earth Day poster contest, and nature walks. These events were publicized in a press release and on Westford CAT.

National Clean Up Day - Westford. 36 volunteers registered for an event through Keep Massachusetts Beautiful. On September 18, 2021 residents picked up litter from Westford streets and natural areas.

Healthy Westford Committee, as part of Earth Month, encouraged residents and workers in Westford to walk around their neighborhood or business grounds on Saturday April 16 to pick up litter. There was no central collection of trash. This was published in the Westford Patch online local events and news.

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:

The Town continues to refine the MS4 GIS mapping with data collected as part of the IDDE Program, catchment investigations, and catch basin inspection & cleaning program. The Town will continue to update our MS4 system mapping in Permit Year 5.

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:

All known outfall and interconnections were screened between Permit Year 1 and Permit Year 3.

Summary reports 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:

www.westfordma.gov/stormwater

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

Number of catchment investigations completed this reporting period:

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

Percent of total catchments investigated:

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

IDDE Progress

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

- 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 4. However, the Fire Department "Incident Analysis" report during Year 4 included 8 instances that required spill response. Fire Department maintains records of these events and did not note whether any material entered the MS4 or water ways.

*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:

Catch basins were inspected as part of the Town's annual catch basin cleaning program. There were no illicit connections or discharges observed during Permit Year 4 cleaning activities.

Employee Training

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

The Westford Department of Public Works employees attended a Good Housekeeping and Pollution Prevention training seminar on June 23, 2022.

The Town of Westford hosted an annual Northern Middlesex Stormwater Collaborative Good Housekeeping Training seminar held at the Department of Public Works on May 19, 2022.

*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:

The number of site plan reviews documented above includes site plans, subdivisions, and stormwater management permits issued during Permit Year 4. A permitted project was only accounted for once in the above total when multiple permits were issued for the same project. The total number of inspections is based on the number of permitted projects under construction during Permit Year 4 regardless of when the project was approved. 110 inspections were completed based on permitted projects only. The total inspections also includes inspections for the Oak Hill reconstruction project where a full-time inspector was on site for 139 days during Year 4.

The Engineering Department continues to regularly inspect and monitor construction sites to prevent the discharge of pollutants. Subdivision, Site Plan, and Stormwater Management Permit decisions regularly include conditions of approval that give the Town the authority to require the implementation of additional best management practices for improved site management if determined necessary. Site contractors typically address any deficiencies in a timely manner to avoid the need for formal enforcement action by the Town.

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

Ordinance or Regulatory Mechanism

Date update was completed (due in year 3):

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:

There were several approved site plans, subdivision, and stormwater projects under construction during Permit Year 4; however, there were no as-built plans submitted because those projects were not completed during the permit year. It is anticipated that several as-built plans will be submitted during Permit Year 5.

Retrofit Properties Inventory

Below, list the permittee-owned properties that could be modified or retrofitted with BMPs to mitigate impervious areas (at least 5):

- 0- Forge Pond Town Beach: 0 W Prescott Street (Tax Map Parcel ID 053 0012 0000) (Identified earlier in the permit term and constructed in 2020. IA reduction and new bioretention area at edge of parking lot. Additional signage and education will be completed.)
- 1- Water Department Treatment Plant: 60 Forge Village Road (Tax Map Parcel ID 020 0043 0000)
- 2- School Maintenance Garage: 30 Beacon Street (Tax Map Parcel ID 030 0045 0000)
- 3- Robinson and Crisafulli Elementary Schools: 33 Robinson Road (Tax Map ID 020 0102 0000)
- 4- Roudenbush Community Center: 73 Main Street (Tax Map ID 059 0042 0000)
- 5- Blanchard Middle School: 20 West Street (Tax Map ID 029 0002 0000)
- 6- Water Department Garage: 0 Forge Village Road (Tax Map ID 025 0010 0001)

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 continued to contract out the cleaning & inspection of all Town owned catch basins in Permit Year 4. Approximately 73 catch basins could not be cleaned due to access reasons. Approximately 38 catch basins were excluded from the inspection & cleaning program because they were located within an active road reconstruction project.

The material removed from catch basins is currently stockpiled in the DPW yard and has not yet been disposed. The 233 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 in Permit Year 5.

A total of 189 catch basins (<6% of the total) were estimated to be more than 50% full when cleaned during Permit Year 4. The Town needs to compare data collected in Year 3 and 4 to determine if any catch basins were more than 50% full during two consecutive cleaning events; these will be prioritized for inspection/cleaning in Year 5.

The estimated total number of catch basins noted above was calculated based on available GIS and field data collected by the Town during the permit year. Each year the Town reevaluates and updates the catch basin mapping layer in GIS as necessary.

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:

Clearing of excessive vegetation was required at one of the Highway Department's stormwater basins.

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:

Westford has continued to implement the Stormwater Management Utility Fee, which was established in September 2019. More information is here: <https://www.westfordma.gov/1351/Stormwater-Billing>

After the Annual Report is submitted, an updated SWMP with Year 4 records including this report will be published to the stormwater website (see page 1).

COVID-19 Impacts

Optional: If any of the above year 4 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 5 requirements summarized below. (Note: impaired waters and TMDL requirements are not listed below)

Yes, I agree

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)
 - Identify additional permittee-owned properties that could potentially be modified or retrofitted with BMPs to reduce impervious areas so that the permittee maintains a minimum of 5 sites in their inventory, until such a time when the permittee has less than 5 sites remaining

Provide any additional details on activities planned for permit year 5 below:

The Town acknowledges the General Permit requirements and will complete as many activities as possible based on funding and staff availability. As in past years, the Town will be entering into a contract with our stormwater consultant to provide professional engineering services and guidance for work related to Permit Year 5 compliance. Our Stormwater Management Utility Fee and Enterprise Fund will continue to be used as a resource to address stormwater related needs and Permit Year 5 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]