

Year 6 Annual Report
Massachusetts Small MS4 General Permit
Reporting Period: July 1, 2023-June 30, 2024

Please DO NOT attach any documents to this form. Instead, attach all requested documents to an email when submitting the form. Also ensure any websites included on this form are to publicly accessible sites

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, 2023 and June 30, 2024 unless otherwise requested.

Part I: Contact Information

Name of Municipality or Organization: Town of Westford

EPA NPDES Permit Number: MAR041232

Primary MS4 Program Manager Contact Information

Name: Paul Starratt, P.E.

Title: Town Engineer

Street Address Line 1: DPW Facility

Street Address Line 2: 28 North Street

City: Westford

State: MA

Zip Code: 01886

Email: pstarratt@westfordma.gov

Phone Number: (978) 399-2716

Stormwater Management Program (SWMP) Information

SWMP Location (publicly available web address): www.westfordma.gov/stormwater

Date SWMP was Last Updated: December 2023

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.

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 publicly available website:

- Updated system map due in year 10 with information from completed catchment investigations
- 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's Operations & Maintenance Plan (SWMMP Volume 3) details maintenance procedures for permittee-owned facilities and MS4 infrastructure, which are implemented to the maximum extent practicable. The DPW coordinates these activities through the efforts of multiple departments. The Town was able to inspect the majority of treatment structures on Town owned property during Permit Year 6. Treatment structures at the Highway Garage were inspected in Permit Year 6 as part of the quarterly SWPPP inspections. The Town will continue to inspect Town owned treatment structures throughout Permit Year 7.

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
- This is not applicable because there are no septic systems present

** 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 6. The Westford Highway Department was responsible for sweeping activities in the fall of 2023 while sweeping in the spring of 2024 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 publicly available 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. Additional sweeping is also performed at active construction sites as necessary. 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. Note that the 2022 Integrated List of Waters removed the TSS impairment from Beaver Brook.

Using catch basin inspection/cleaning data from the past two years, it was determined that a total of 23 catch basins were more than 50% full when inspected during both the Permit Year 5 and Permit Year 6 cleaning activities. These catch basins represent < 0.7% of Town owned catch basins. Follow-up inspections begin in September 2024 by the Westford Engineering Department to determine why these limited number of catch basins fill so quickly over the course of a 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:

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.

In Permit Year 5, the Town evaluated any changes to the impairments and/or receiving waters based on the final 2022 303(d) List and the analysis is posted on the Town website. The changes described do not add, remove, or change any receiving waters.

During Permit Year 6, the following updates were made to the Town's outfall inventory;

- 8 outfalls were added when they were discovered in the field during catchment investigations;
- 1 outfall was added back into the inventory when it was incorrectly removed in a previous permit year;
- 4 outfalls were removed as they were found to not exist, were misclassified stormwater assets (BMP inlets), or privately owned;
- 2 outfalls were discovered during catchment investigations but could not be screened within the Permit Year 6 reporting period. The Town will screen these outfalls in Permit Year 7.

These modifications do not add, remove, or change any 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 Residents & Annual Message: Lawn Care & Yard Waste

Message Description and Distribution Method:

Articles on lawn care and yard waste were included in the Water Department's Fall 2023 and Spring 2024 newsletters as well as the October 2023, April 2024, & May 2024 editions of the Town Manager's Newsletter. A stormwater related lawn care post was also published on the Public Works Facebook page on April 1, 2024. The various articles provided guidance on how to properly manage leaves, lawn clippings, yard waste, and fertilizer. One of the articles also focused on the importance of sustainable landscaping and lawn care practices.

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 Main News feed on the Town website has approximately 870 subscribers that were notified when the Town Manager's Newsletter and articles are posted. The Westford Public Works Facebook page has 811 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: Annual Septic System Maintenance Messages

Message Description and Distribution Method:

Annual septic system messages were posted on the Westford Health Department's Facebook page on April 25, 2024 and on the Westford Public Works Facebook page on April 3, 2024. Septic system articles were published in the Water Department's Fall 2023 newsletter and in the July 2024 edition of the Town Manager's Newsletter. The posts and articles included various EPA SepticSmart infographics and brochures. The Westford Health Department also distributed various septic system related educational materials to property owners throughout the year as appropriate.

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

Responsible Department/Parties: Health Department

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 Main News feed on the Town website has approximately 870 subscribers that were notified when the Town Manager's Newsletter and articles are posted. The Westford Public Works Facebook page has 811 followers and the Westford Health Department Facebook page has 1,900 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: Stormwater Pollution and Importance of Stormwater Management

Message Description and Distribution Method:

The Water Department Fall 2023 newsletter included an article that discussed stormwater pollution and the importance of proper stormwater management. The "Fowl Water: Think Blue Massachusetts" stormwater PSA video was posted on the Public Works Facebook page on June 24, 2024.

Targeted Audience: Residents, Businesses, Institutions and Commercial Facilities

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). The Public Works Facebook page has 811 followers.

Message Date(s): Fall 2023 and 6/24/24

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:Septic System and Well Information Seminar

Message Description and Distribution Method:

Two separate "Septic System and Well Information Sessions" were sponsored by the Westford Health Department on November 1, 2023. Topics included septic system care & maintenance, private well testing

requirements, and PFAS information. These sessions were open to the public with the target audiences being residents and real estate agents.

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

Responsible Department/Parties: Health Department

Measurable Goal(s):
Approximately 15 people attended the seminar.

Message Date(s): 11/1/23

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 provided to all Westford dog owners, either in person or by mail, that applied for a dog license (approx. 2,000 dogs). The flyers included the potential harmful impacts to water quality if dog waste is not disposed of properly. A "Scoop the Poop!" pet waste message was posted on the Public Works Facebook page on August 25, 2023. The "Fowl Water: Think Blue Massachusetts" stormwater PSA video was posted on the Public Works Facebook page on June 24, 2024 which included the importance of pet waste management.

Targeted Audience: Residents

Responsible Department/Parties: Engineering

Measurable Goal(s):
All licensed dog owners received a pet waste brochure in this Permit Year. The Public Works Facebook page has 811 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: Town-wide Catch Basin Cleaning & Street Sweeping

Message Description and Distribution Method:

Posts were made to the Westford Public Works Facebook account to notify the public of the on-going catch basin cleaning and street sweeping operations. The posts included the importance of cleaning our catch basins and sweeping our streets to protect against stormwater related pollution.

Targeted Audience: Residents

Responsible Department/Parties: Engineering

Measurable Goal(s):

The Public Works Facebook page has 811 followers.

Message Date(s): 3/29/24 & 4/23/24

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: Swimming Pools & Surface Water Quality

Message Description and Distribution Method:

DCR's Swimming Pools & Surface Water Quality brochure was published in the September 2023 edition of the Town Manager's Newsletter. The brochure highlighted pollution prevention practices that should be followed when draining swimming pools and hot tubs in order to protect local waterbodies.

Targeted Audience: Residents

Responsible Department/Parties: Engineering

Measurable Goal(s):

The Main News feed on the Town website has approximately 870 subscribers that were notified when the Town Manager's Newsletter and articles are posted.

Message Date(s): September 2023

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:**

A hard copy of the Town's NPDES Stormwater Program Compliance Plan was made available at the Westford Department of Public Works for review and comment by the general public. The compliance plan is also posted on the Town's website complete with instructions on how the public can provide comments or input on the plan.

Every property in Westford that contains impervious area receives an annual stormwater bill in accordance with Westford's Stormwater Management Utility Fee that was adopted in 2019. Each bill includes information on how to access and review the Town's Stormwater Management Master Plan as well as other stormwater related resources.

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:**

The Westford Recycling Commission held a Household Hazardous Waste (HHW) collection event at the Westford Highway Department on May 4, 2024. The event was advertised on the Town website and the Westford Health Department Facebook page.

"Electronics and More Collection" events were held at the Highway Department on September 23, 2023 and April 27, 2024.

Westford Climate Action sponsored Westford Earth Month in April 2024 (<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." The events included a Health and Wellness Fair, discussion on electric vehicles, and a composter demonstration and sale.

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

Percent of Phase II map complete:

Optional: Provide additional status information regarding your map:

The "Percent of Phase II map complete" was determined using the Town's completed catchment investigation percentage where the Phase II mapping has been field verified. This percentage is a conservative estimate since the Town has a robust stormwater GIS database within the MS4 with 526 outfalls, approximately 5,630 drainage structures (catch basins, manholes, etc.), and 60 miles of drainage pipes mapped. The Town plans on continuing to confirm the completeness of its Phases II mapping during the Town's catchment investigation efforts. This percentage will be continuously updated in upcoming permit years.

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

<https://www.westfordma.gov/stormwater>

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

Number of outfalls screened: 9

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

Percent of outfalls screened: 99

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

During Permit Year 6 catchment investigations, eleven (11) new outfalls were identified. Nine (9) of those outfalls were successfully screened for dry weather flow. The screening results can be found at <https://www.westfordma.gov/stormwater>. The remaining two (2) outfalls could not be screened within the Permit Year 6 time frame and have been scheduled to be screened in Permit Year 7.

All remaining MS4 outfalls were screened during dry weather conditions between Permit Year 1 and Permit Year 3. The number of outfalls will fluctuate as additional GIS mapping updates and field work are completed as part of the IDDE program.

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 publicly available website:

<https://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: 81

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

Percent of total catchments investigated: 37

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

Eighty-one (81) catchment investigations were conducted during Permit Year 6 as part of the Town's IDDE Program implementation. Fourteen (14) of those catchments were found to have one (1) or more SVFs and thus marked for wet weather screening. Wet weather screening is scheduled to be completed in Permit Year 7 for those catchments. All other outfall catchments reviewed during Permit Year 6 were found to have no SVFs. The percent of total catchments investigated includes only the catchments considered complete. Six (6) catchments have been partially investigated but were not fully completed by the end of Permit Year 6. These catchments have been scheduled for completion in Permit Year 7.

The Town will continue to complete catchment investigations, including dry weather key junction screening and wet weather outfall sampling for catchments with one or more SVFs. The percent complete is based on total MS4 outfalls/interconnections mapped and may change as the mapping continues to be refined.

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 publicly available website:

One illicit discharge related to a failing residential septic system was found and eliminated during Permit Year 6. Details of the illicit discharge can be found at www.westfordma.gov/stormwater. The Fire Department "Incident Analysis" report during Year 6 included 10 instances that initiated a HazMat response. Fire Department maintains records of these HazMat events and did not note whether any material entered the MS4 or water ways. None of the events required reporting to the State.

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: 1

Number of illicit discharges removed: 1

Estimated volume of sewage removed: 10 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: 1

Total number of illicit discharges removed: 1

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. During those inspections a total of twenty-seven (27) catch basins were flagged for potential illicit discharges based on observations made at the time of cleaning. The Town began the process of performing follow-up inspections to determine if illicit discharges exist at each of these catch basins. The results of these inspections will be documented in the Permit Year 7 annual report.

Employee Training

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

Employees of the Westford Department of Public Works attended a MS4 Program Employee Training - IDDE Refresher & Municipal Good Housekeeping, and SPCC training seminar on April 18, 2024 that was conducted by the Town's stormwater consultant. The Northern Middlesex Stormwater Collaborative also sponsored an IDDE and Municipal Good Housekeeping Programs training event on April 16, 2024.

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: 10

Number of inspections completed: 65

Number of enforcement actions taken: 3

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 6. The total number of inspections is based on the number of permitted projects under construction during Permit Year 6 regardless of when the project was approved. Approximately 65 inspections were completed based on permitted projects only. Additional site construction inspections were also performed on Town sidewalk, culvert, and road paving projects.

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 (BMPs) 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 or fines. Three (3) official enforcement orders were issued during Permit Year 6. All three (3) orders were associated with a private subdivision project for failure to maintain erosion controls and for the discharge of silt laden runoff from the subject property into a wetland during construction. The orders included corrective actions required to address the impacts of the discharge and to prevent future releases from occurring.

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

Ordinance or Regulatory Mechanism

Date update was completed (due in year 3): June 21, 2021

Website of ordinance or regulatory mechanism: <https://www.westfordma.gov/stormwater>

As-built Drawings

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

Number of as-built drawings received: 21

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

As-built drawings included both final and interim as-built plans for permitted projects. Permitted projects included Site Plans, Subdivisions, and individual lots that required stormwater management permits. Approximately 16 of the 21 as-built drawings received were associated with individual lots located within residential subdivision projects where stormwater BMPs were required. Most of these subdivision lots were less than one-acre in size.

Street Design and Parking Lots Report

Below, describe any changes made or planned to be made to local regulations and guidelines based on the report completed in Year 4:

The Local Code Assessment was completed in Permit Year 4. Proposed recommendations are not due until future permit years. The Engineering Department presented the proposed recommendations at a Planning Board meeting in June 2023. The Town will continue to work towards the implementation of proposed revisions and recommended actions.

Green Infrastructure Report

Below, describe progress towards making green infrastructure practices allowable based on the report completed in Year 4:

The Local Code Assessment was completed in Permit Year 4. Proposed recommendations are not due until future permit years. The Engineering Department presented the proposed recommendations at a Planning Board meeting in June 2023. The Town will continue to work towards the implementation of proposed revisions and recommended actions.

Retrofit Properties Inventory

Below, list remaining permittee-owned properties that could be modified or retrofitted with BMPs to mitigate impervious areas (must maintain a minimum of 5 sites in inventory until less than 5 sites remain):

- 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)

A BMP Retrofit Assessment & Inventory was completed in Permit Year 4.

Below, list all properties that have been modified or retrofitted with BMPs to mitigate impervious area that were inventoried as part of 2.3.6.d of the permit and the type of BMP(s) implemented. Non-MS4 owned properties that have been modified or retrofitted with BMPs to mitigate impervious area may also be listed, but must be indicated as non-MS4.

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. An educational sign is proposed to be installed at this location in Permit Year 7).

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: 3,415

Number of catch basins cleaned: 3,415

Total volume or mass of material removed from all catch basins: 250 cubic yards

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

Total number of catch basins: 3,440

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 6. The volume of material removed from all catch basins during Permit Year 6 as noted above should be considered approximate. This estimated quantity was based on a visual inspection of the stockpile stored at the DPW after all catch basin cleaning activities were completed for Permit Year 6.

During Permit Year 6, approximately 561 tons of catch basin cleaning material was removed from the DPW yard and disposed of at a landfill. This included stockpiled materials from previous permit years as well as some of the material generated during Permit Year 6.

A total of 23 catch basins (<0.7% of the total) were estimated to be more than 50% full when cleaned during both Permit Year 5 & 6. The Town has prioritized these catch basins for more frequent inspection/cleaning in Permit Year 7. The Town is also investigating the potential source of any excessive debris/sediment that is causing the catch basins to fill so quickly. 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: 304

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: 12

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

The old dumpsters at the DPW facility were replaced with new covered containers.

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 publicly available 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

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 on the fee can be found at: <https://www.westfordma.gov/1351/Stormwater-Billing>.

The Town continued membership and participation in the Northern Middlesex Stormwater Collaborative (NMSC). NMSC conducted a series of meeting and activities during Permit Year 6 that aimed to help members stay informed about the latest developments in stormwater management, engage with experts in the field, and meet regulatory requirements related to the MS4 permit.

After the Permit Year 6 Annual Report is submitted, an updated SWMP with Year 6 records including this report will be published to the stormwater website.

Year 7

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

Yes, I agree

- Complete investigations of catchments associated with Problem Outfalls
- Complete investigations of catchments where any information gathered on the outfall/interconnection identifies sewer input

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 7 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 7 compliance. The Engineering Department also hired a new staff engineer in September 2024. The staff engineer position will support Town-wide stormwater management needs and initiatives. Our Stormwater Management Utility Fee and Enterprise Fund will continue to be used as a resource to address stormwater related needs and Permit Year 7 requirements.

Part V: Certification of Small MS4 Annual Report 2024

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]