

Year 7 Annual Report

Massachusetts Small MS4 General Permit

Reporting Period: July 1, 2024-June 30, 2025

****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, 2024 and June 30, 2025 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/339/Managing-Our-Stormwater

Date SWMP was Last Updated: January 2025

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 7 Requirements

- ☒ Completed catchment investigations associated with Problem Outfalls
☒ Completed catchment investigations where information gathered on the outfall/interconnection indicated sewer input

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 does not have any Problem outfall catchments. The Town does not have any outfalls that met the MS4 permit's criteria for likely sewer input. However, the Town does have one outfall (OF_592) that was categorized as high priority based on indicators of potential illicit connections from the dry weather outfall screening in PY7. The catchment was investigated in PY7 but further mapping investigations are needed to call the catchment investigation complete. No indication of likely sewer input was found during catchment investigations.

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.

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 F and H 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 7. The Westford Highway Department was responsible for street sweeping in the fall of 2024 while street sweeping in the spring of 2025 was performed by a hired contractor. Additional street sweeping was performed by the Highway Department as necessary throughout the permit year.

Solids, Oil and Grease (Hydrocarbons), or MetalsAnnual 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.

Using catch basin inspection and cleaning records from the past two years, it was found that twenty eight (28) catch basins were more than 50% full during both the Permit Year 6 and Permit Year 7 cleanings. These account for less than 0.8% of all Town-owned catch basins. A field review of each catch basin was initiated in

September 2025.

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. A minor correction to our impaired waters table is posted on the Town website. The changes described do not add, remove, or change any receiving waters.

The Final 2022 Integrated List of Waters remains the most current version in effect; therefore, there were no changes to impairments and/or receiving waters in Permit Year 7.

During Permit Year 7, the following updates were made to the Town's outfall inventory;

- 18 outfalls were added when they were discovered in the field during catchment investigations;
- 2 outfalls were added back into the inventory when they were incorrectly removed in a previous permit year;
- 14 outfalls were removed as they were found to not exist, were misclassified stormwater assets (BMP inlets), or privately owned;
- All outfalls that were discovered during catchment investigations were able to be screened within the Permit Year 7 reporting period.
- At the conclusion of Permit Year 7, the Town's MS4 inventory included 532 outfalls and interconnections.

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 Spring 2025 newsletter and in the October 2024 edition of the Town Manager's Newsletter. A Fall Yard Cleanup & Stormwater Awareness post was published on the Public Works Facebook page on October 31, 2024, and May 22, 2025. The various articles provided guidance on how to properly manage leaves, lawn clippings, yard waste, and fertilizer.

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 783 subscribers that were notified when the Town Manager's Newsletter and articles are posted. The Westford Public Works Facebook page has approximately 1,100 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 September 16, 2024, and on the Westford Public Works Facebook page on April 3, 2024. Septic system articles were published in the Water Department's Fall 2024 newsletter and in the December 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 783 subscribers that were notified when the Town Manager's Newsletter and articles are posted.

The Westford Public Works Facebook page has approximately 1,100 followers and the Westford Health Department Facebook page has approximately 2,000 followers.

Message Date(s): 9/16/24, 4/3/24, Fall 2024, December 2024

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 Seminars

Message Description and Distribution Method:

The Westford Health Department hosted a Private Well and Septic System Informational seminar on October 30, 2024, and April 10, 2025. Topics included septic system care & maintenance, private well testing requirements, and PFAS information. These sessions were advertised on the Health Department's Facebook page which has approximately 2,000 followers and in the October 2024 Town Manager's Newsletter. The seminars were open to the public.

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

Responsible Department/Parties: Health Department

Measurable Goal(s):

There were 16 attendees at the October 30, 2024 seminar, and 2 attendees at the seminar on April 10, 2025.

Message Date(s): 10/30/24, 4/10/25

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 flyer 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 July 10, 2024, and June 30, 2025.

Printed pet waste flyers titled "Important Notice: Pet Waste Dumping" were mailed out to 83 licensed dog owners in a neighborhood where pet waste bags were discovered in a catch basin.

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 approximately 1,100 followers.

Message Date(s): 7/10/24, January 2025, 6/30/25

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 Westford Public Works Facebook account to notify the public of the on-going catch basin cleaning operations. The post included the importance of cleaning our catch basins to protect against stormwater related pollution.

Targeted Audience: Residents

Responsible Department/Parties: Engineering

Measurable Goal(s):

The Public Works Facebook page has approximately 1,100 followers.

Message Date(s): 4/4/2025

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 Department of Public Works provided the Select Board with an overview of the Town's stormwater management program at the Select Board's May 27, 2025 meeting. The presentation covered several topics, including an introduction to stormwater management, current and potential future MS4 regulations, status of the stormwater enterprise fund, upcoming capital needs, a stormwater assessment summary, and recommendations for future stormwater billing rates. A Q&A session with the Select Board and members of the public followed the presentation. The meeting was advertised in accordance with Massachusetts Public Notice requirements and was broadcast on local community access television.

A Household Hazardous Waste Collection event was held at the Westford Highway Department on May 3, 2025. The event was advertised on the Town website, Town Facebook accounts, and on local community access television.

Westford held a Zero Waste Day on April 26, 2025, which included collection of electronics, furniture, appliances, as well as other household goods.

Westford Climate Action organized Westford Earth Month 2025 which featured a variety of community-focused events throughout the month of April focused on raising awareness and encouraging local engagement on climate issues and challenges.

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 estimated based on the Town's completed catchment investigations 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 532 outfalls, approximately 5,630 drainage structures (catch basins, manholes, etc.), and 60 miles of drainage pipes mapped. The Town will continue 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:

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:

During Permit Year 7 catchment investigations, eighteen (18) new outfalls were identified. All eighteen (18) were screened for dry weather flow. Additionally, two (2) outfalls were discovered in PY6 and successfully

screened in PY7. One (1) outfall was added back into the inventory and successfully screened in PY7. The screening results can be found at <https://www.westfordma.gov/stormwater> under Annual Stormwater Reports.

All remaining MS4 outfalls were screened under dry weather conditions between Permit Year 1 and Permit Year 3, with additional screenings conducted in Permit Years 5 and 6. The number of outfalls may 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: 87

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

Percent of total catchments investigated: 53

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

Eighty seven (87) catchment investigations were completed during Permit Year 7 as part of the Town's IDDE Program implementation. Thirteen (13) of these had been initially investigated in Permit Year 6, with key junctions screened as needed, but were considered incomplete due to one or more SVFs. Required wet weather outfall screening was completed in Permit Year 7, and these catchments are now considered complete. Wet weather screening was conducted at sixteen (16) outfalls on March 17 and May 6, 2025. All other outfall catchments reviewed during Permit Year 7 were found to have no SVFs.

The percent of total catchments investigated includes only the catchments considered complete. Twenty (20) catchments have been partially investigated but were not fully completed by the end of Permit Year 7. These catchments have been scheduled for completion in Permit Year 8.

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:

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:

In November 2024, the Westford Engineering Department inspected twenty-six (26) catch basins in the field for potential illicit discharges based on observations from the Town's PY6 catch basin cleaning program. Twenty-five (25) catch basins were confirmed not to contain illicit discharges, while one (1) catch basin was found to contain several pet waste bags. In response, a notice was mailed to eighty-three (83) properties with licensed dogs, reminding residents that dumping into catch basins is prohibited and may cause clogged pipes, flooding, and the release of pollutants to nearby waterbodies. Additional field investigations were conducted at outfall OF_109 in PY7 which was flagged during the catch basin cleaning program. It was determined that no additional follow-up action was required.

In August 2025, the Engineering Department conducted follow-up inspections on fourteen (14) catch basins flagged during the PY7 cleaning program. All catch basins were confirmed not to contain illicit discharges.

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 4, 2025 that was conducted by the Town's stormwater consultant. The Northern Middlesex Stormwater Collaborative (NMSC) also sponsored an "IDDE and Municipal Good Housekeeping Programs" training event on April 28, 2025 that was attended by members of the Westford Engineering Department. Additional informal training was also provided to DPW staff throughout the year as necessary.

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: 85

Number of enforcement actions taken: 2

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 7. The total number of inspections is based on the number of permitted projects under construction during Permit Year 7 regardless of when the project was approved. The total number of inspections completed is based on permitted projects only. Additional site construction inspections were also performed on Town sidewalk, culvert, road reconstruction, and 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.

There were no enforcement orders issued under the Town's Illicit Discharge Bylaw during Permit Year 7. Two (2) Enforcement Orders were issued by the Westford Conservation Commission during Permit Year 7. Both orders issued were related to clearing activities beyond approved limits of work.

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: 9

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. Four (4) of the nine (9) 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 and may revisit the recommendations proposed in the Local Code

Assessments to assess the schedule and feasibility given staffing constraints.

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 and may revisit the recommendations proposed in the Local Code Assessments to assess the schedule and feasibility given staffing constraints.

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 for this retrofit project was developed in PY7 and installed in September 2025.

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: 3,413

Number of catch basins cleaned: 3,413

Total volume or mass of material removed from all catch basins: 300 tons

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

Total number of catch basins: 3,449

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 7. The volume of material removed from all catch basins during Permit Year 7 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 7. Disposal of catch basin waste is scheduled for October 2025.

Using catch basin inspection and cleaning records from the past two years, it was found that twenty eight (28) catch basins were more than 50% full during both the Permit Year 6 and Permit Year 7 cleanings. These account for less than 0.8% of all Town-owned catch basins. A field review of each catch basin was initiated in September 2025.

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. Catch basins located within the limits of an active construction project were not included in the annual catch basin cleaning program.

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:

There were no corrective actions required during PY7.

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. This dedicated fee provides a stable funding source to support MS4 compliance and enables the Town to plan and invest in yearly repairs, upgrades, and replacement of aging stormwater infrastructure. More information on the fee can be found at: <https://www.westfordma.gov/stormwater>.

The Town maintained its membership and active participation in the Northern Middlesex Stormwater Collaborative (NMSC). Throughout Permit Year 7, the NMSC hosted a series of meetings and activities designed to keep member communities up to date on stormwater management practices, provided opportunities to engage with industry peers and experts, conducted training sessions, and provided support to assist the Town in MS4 regulatory compliance. NMSC was awarded a grant in Permit Year 7 from the Massachusetts Municipal Vulnerability Preparedness (MVP) program for Merrimack River Revive, a multi-phase watershed study.

After the Permit Year 7 Annual Report is submitted, an updated SWMP with Year 7 records including this report will be published to the stormwater website.

Year 8

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 8 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 8 below:

The Town acknowledges the General Permit requirements and will complete as many activities as possible
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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 8 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 8 requirements.

Part V: Certification of Small MS4 Annual Report 2025

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.

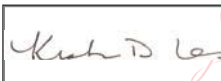
Name:

Kristen D. Las

Title:

Town Manager

Signature:



Digitally signed by Kristen D. Las
DN: cn=Kristen D. Las, o, ou,
email=klas@westfordma.gov, c=US
Date: 2025.09.29 09:45:20 -04'00'

Date:

9/29/2025

*[Signatory may be a duly authorized
representative]*