



GET THE NEWS!

Massachusetts Stormwater News is a collaborative effort of the Massachusetts Department of Environmental Protection (MassDEP) and the New England office of the U.S. Environmental Protection Agency (U.S. EPA). This newsletter will be sent via email every few months to provide information to municipalities and others related to the Massachusetts Small Municipal Separate Storm Sewer System (MS4) permit. MA Stormwater News will feature topics of interest, provide updates on upcoming permit deadlines, and highlight assistance resources from MassDEP, U.S. EPA and others.

U.S. EPA and MassDEP know that stormwater management is just one of the many challenges facing municipalities. We are committed to working with municipalities as you move forward on permit implementation.

This issue focuses on preparing and submitting the First Year Annual Progress Report. We also highlight some assistance and training resources from U.S. EPA and MassDEP.

Preparing and Submitting Your MS4 Annual Progress Report

Municipalities permitted to discharge stormwater under the 2016 Massachusetts Municipal Separate Storm Sewer System (MS4) Permit are required to submit an Annual Report to EPA and MassDEP each year of the permit term. Annual Reports include a self-evaluation of program effectiveness and describe a permittee's compliance with all applicable permit terms and progress in addressing stormwater pollution. Annual Reports for the current reporting period (May 1, 2018 through June 30, 2019) are due by September 30, 2019.

In the February 2018 issue of Stormwater News (see the link in the Toolkit on page 5), we discussed many of the important reasons for annual reporting. Self-reporting on progress is a key component to assessing overall compliance with the permit. Through annual reporting, permittees document actions taken, describe program effectiveness and completeness, showcase accomplishments, and identify areas where changes may be needed or were made to the Stormwater Management Program (SWMP) over the reporting period. Comprehensive data management systems that organize and track information over time not only bring efficiency to annual evaluation and reporting, but they help permittees spot trends and problems. Details on what is required in the Annual Reports are discussed later in this issue.

Preparing the Annual Report is an opportunity for collaboration and coordination among municipal departments. It will also yield a tool for informing decision-makers and other community members about expenditures, actions taken, and future expected needs for managing stormwater and protecting water resources. Finally, the Annual Report is a compilation that can be a useful resource during staff transitions such as training new employees.

In this issue we take a closer look at preparing Annual Reports under the new permit. We provide information to help both new permittees and existing permittees that were previously covered under the 2003 permit understand the annual reporting requirements. We also highlight tools and resources for preparing your Annual Report and suggest strategies to help you set yourself up to efficiently prepare reports that are accurate, complete and submitted on time.

REMINDER:

Annual Reports are due **September 30, 2019**

Email them to stormwater.reports@epa.gov and
Frederick.Civian@mass.gov

Please note that there are two different annual reporting templates for use by Massachusetts MS4s. One has been designed for existing MS4s that were previously covered under the 2003 permit, and another is for the new MS4s that are now covered with the 2016 permit. In order to ensure that you are reporting the most accurate data, be sure to use the template that is appropriate for your MS4. Refer to pages 6-9 for the table 'What Must be Included in the Annual Report?' and the Annual Reporting Toolkit on page 5 for information about assistance resources, including:

- [August 22, 2019 webinar](#): *Preparing and Submitting Your MS4 Annual Progress Report Using the New EPA Template*
- [Annual Reporting Templates](#), which we encourage permittees to use.

Preparing Your Annual Report

Permittees must submit an Annual Report each year of the permit term. EPA has prepared Annual Reporting Templates and applicable guidance for use by new permittees and those previously covered by the 2003 permit. These are available on the EPA website at: <https://www.epa.gov/npdes-permits/stormwater-tools-new-england#arr>.

In addition, each permittee should have received a personalized Annual Report template which was sent to the email address provided on their Notice of Intent (NOI) in early August. If you did not receive it, please contact EPA.

Using the EPA Annual Report Template

The templates provide a comprehensive list of all the elements that need to be reported to EPA and MassDEP for this reporting period. While use of a template is not required, it is intended to help you submit all the required information seamlessly. You do not need to search the permit to ensure you have included everything. In addition, the templates are designed to walk you through your self-assessment and focus your efforts on providing information relevant to that specific reporting period.

GPS Equipment Loan & On-site Training Program

EPA has a limited number of Global Positioning System (GPS) units available to loan, at no cost, for stormwater mapping. EPA will also provide on-site training on the use of the GPS equipment. For more information contact Deborah Cohen at cohen.deborah@epa.gov.

How to use the templates?

Please **do not fill out the form in your web browser** as you will be unable to save your information. The annual reporting templates work best when downloaded and opened in Adobe Reader. Right click on the template link, "save as" a PDF document, and then open in Adobe Reader.

If you have previously used EPA's Notice of Intent (NOI) or SWMP template, you will be familiar with the look and feel of the Annual Report template.

- Templates are available for new permittees and permittees that were covered under the 2003 permit.
- Each section of the Annual Report template needs to be completed.
- Unless stated otherwise in the Annual Report template, no optional metrics are required in the Annual Reports under the 2016 Massachusetts MS4 Permit.
- If any checkbox or metric is left blank in the Annual Report template, it will be assumed that the associated permit requirement is **incomplete**. You can use the text boxes in each section of the template to explain the deficiencies.
- As with the NOI, the Annual Report template includes the option for electronic signature prior to submittal. A button is included to print a signature page for those permittees that do not have the ability to sign the Annual Report electronically.
- EPA prefers that you submit your Annual Report electronically to the email addresses provided in the template. Please ensure you attach your completed Annual Report and all other documents required to be submitted as separate files in your email submission.

If you do not use the EPA Template

For those who do not use the template, please ensure that the document(s) you send to EPA and MassDEP contain all the information required to be reported in a given reporting period. The information in the table on page 6, or the Annual Report template, can also be used as a guide to what must be included for this reporting period. The reporting requirements do change from year-to-year so permittees must be careful to ensure the correct information is being submitted in compliance with permit requirements.

What Must be Included in the Annual Report?

Permittees are required to submit information as described in Part 4.0 and in other parts of the permit. Annual reports are intended to be a yearly summary of your Stormwater Management Program (SWMP) implementation and include, among other things, a self-assessment, changes to your SWMP, information on each Minimum Control Measure (MCM) and information on actions taken to address impaired waters and Total Maximum Daily Loads (TMDLs). The template will walk you through each of the sections detailed below to ensure you are reporting the correct information.

Details on Each Minimum Control Measure

Preparing the Annual Report requires a review of the Best Management Practices (BMPs) you've implemented for each MCM. To do this you'll need to examine the data, results, products and other information associated with the activities. Summarized in the table *'What Must be Included in Your Annual Report'* found on pages 6-9 of this issue are the activity measures for each MCM that must be submitted by MS4s that were covered under the 2003 permit. It is important to note that new permittees have different reporting requirements for the first reporting year and different due dates for certain deliverables.

Self-Assessment Review (Part 4.1)

Permittees must annually self-evaluate their compliance with the terms and conditions of the permit. In general, this self-assessment includes an overall evaluation of the appropriateness of the selected BMPs and an assessment of permit compliance through BMP implementation over the reporting period. In short, have you done everything the permit requires during the previous reporting period? In the template, the self-evaluation reviews are prepared as a checklist of year 1 permit requirements and a narrative summary that is submitted with the Annual Report. Be sure to include BMP modifications along with a brief explanation of the modifications.

Best Practices for Preparing an Annual Report

The best MS4 Annual Reports are timely, current and provide enough information in each section to clearly illustrate the status of the SWMP work in your community. Please consider the following best practices when preparing your Annual Report:

Start early! It takes time to create an Annual Report that accurately reflects the work completed during the reporting period. Starting early gives you time to assemble the information and communicate with others. It also provides more time for you to resolve or develop plans for issues or problems you identify while preparing your Annual Report. Annual Reports must be submitted electronically via email or by mail by **September 30, 2019**.

Use an EPA Annual Report Template. Refer to pages 2 and 3 of this issue of Stormwater News for more information about the templates.

Get organized and stay organized. Permittees with an organized system for managing the many field forms, analyses, reports, maps, and other data associated with implementing their SWMP throughout the entire permit term are in the best position to efficiently and comprehensively review their activities for preparing their Annual Report and keeping their SWMP up-to-date.

- Create physical and/or electronic folders for ongoing management of the information associated with your program.
- Using templates, inventories, spreadsheets and other systems that allow you to track information over the course of the year (e.g., street sweeping, catch basin cleaning) further increases reporting efficiency. By compiling information throughout the year in one place, it's easily accessible in your tracking program when you need to report a number (e.g., volume of catch basin material removed) in your Annual Report.

Massachusetts Statewide Education Program

Think Blue Massachusetts is a statewide educational campaign run by the Massachusetts Statewide Municipal Stormwater Coalition to help residents and businesses do their part to reduce polluted runoff and keep Massachusetts lakes, rivers, and streams clean and healthy. Learn more at www.thinkbluemassachusetts.org



Best Practices for Preparing an Annual Report (Cont.)

- The IDDE reporting requirements include all the information related to your IDDE program implementation, including all sampling results. This is a lot of data! The easiest way to report this information is to attach a spreadsheet (or series of spreadsheets) to the email submission of your Annual Report that contains this information. There is no need to retype everything you did. If you have a spreadsheet or a database where this information is kept, just attach it to your Annual Report.
- Citing websites is OK! The Annual Report template contains many documents that must also be submitted with your Annual Report. However, if these documents are available on a website there is no need to resubmit them to EPA or MassDEP. You can provide web links in your Annual Report. For instance, the permit requires you to identify each outfall and interconnection discharging from the MS4, classify each into the relevant category, and priority rank each catchment for IDDE investigation. This data can either be provided in a separate spreadsheet or you can provide the URL to EPA and MassDEP to find the information on a website.

Attend the [August 22nd webinar](#) to learn about the EPA templates and ask your annual reporting questions.

Keep your SWMP up-to-date. As described in the [February 2019 issue of Stormwater News](#), keeping your SWMP up-to-date brings many benefits to permittees. These include efficient annual evaluation and reporting.

Use what you've already submitted in your NOI or a prior Annual Report when the information remains pertinent in the current reporting year. An example of such information is the date a bylaw or ordinance was passed. Submitted copies of NOIs and Annual Reports are available at the links shown in the Toolkit on page 2.

Share your draft report with other municipal departments. Seek their input to ensure the report is complete and accurate and includes a detailed summary of what each department has done.

Double check the entire report before submission. Be sure the information accurately reflects current practice and includes actions or initiatives you've taken over the past year. Check to ensure no inconsistencies exist between the different parts of the report (e.g., the information in each MCM section and your narrative self-assessment review).

How to Submit an Annual Report

Reports and required documents must be sent to **both EPA and MassDEP**. Reports can be submitted electronically OR by mail as shown below.

	EPA	MassDEP
Email	stormwater.reports@epa.gov	frederick.civian@mass.gov
Mail (postage)	Glenda Velez US EPA Stormwater & Construction Permits Section (06-1) 5 Post Office Square, Suite 100 Boston, MA 02109	Fred Civian MassDEP, Bureau of Water Resources, 5 th floor One Winter Street Boston, MA 02108

Submittal of Annual Reports is a requirement of the MS4 permit. Failure to submit Annual Reports may subject the permittee to possible enforcement action. Communities that do not submit Annual Reports are missing an important opportunity to bring focus to the stormwater program, its associated requirements, and budget implications for the community.

Resources and Contacts

Specific questions about the permit should go to:

EPA: Newt Tedder - tedder.newton@epa.gov or 617-918-1038

MassDEP: Fred Civian - frederick.civian@mass.gov or 617-292-5821

Annual Reporting Toolkit

Webinar: Preparing and Submitting Your MS4 Annual Progress Report Using the New EPA Template **NEW**

Date: August 22, 2019, 10:00AM -11:00AM EDT

To register: <https://register.gotowebinar.com/register/2840203860450621954>

MS4 Annual Reporting Templates **NEW**

For new permittees and those covered under the 2003 Permit:

<https://www.epa.gov/npdes-permits/stormwater-tools-new-england#arr>

Tips and Techniques for Submitting your MS4 Annual Progress Report, Massachusetts Stormwater News, February 2018

<https://www3.epa.gov/region1/npdes/stormwater/ma/ma-stormwater-news-feb-2018.pdf>

2016 MS4 Permit Archive

Access NOIs and Annual Reports submitted under the 2016 permit.

<https://www.epa.gov/npdes-permits/regulated-ms4-massachusetts-communities>

2003 MS4 Permit Archive

Access NOIs and Annual Reports submitted under the 2003 permit.

<https://www.epa.gov/npdes-permits/2003-small-ms4-general-permit-archives-massachusetts-new-hampshire#2003-ms4-docs-annual-report-info>

Template Delegation of Authority Memo

<https://www.epa.gov/npdes-permits/stormwater-tools-new-england#swmp>.

Additional Assistance Resources from EPA and MassDEP

Stormwater Tools in New England Website

Find the latest tools, resources, and updates on upcoming training opportunities.

<https://www.epa.gov/npdes-permits/stormwater-tools-new-england>

Soak Up the Rain Webinars **NEW**

Accelerating Statewide Green Infrastructure Investment in Rhode Island

Wednesday, August 28th, 1:00 PM-2:30 PM EST

To register: <https://attendee.gotowebinar.com/register/836734246520034817>

Soak Up the Rain Webinars **NEW**

Goin' Mobile: Mapping your Stormwater Assets

Tuesday, September 24th, 1:30-3:00 PM EST

To register: <https://attendee.gotowebinar.com/register/7867437106117050369>

Public Education and Outreach Program

The MS4 Permit requires each town to implement a public education and outreach program that reaches four different audiences and that includes messages that are most relevant to that community. Town officials can click on MassDEP's link below to download – and save – brochures, pamphlets and other materials and use those to help comply with Section 2.3.2.c of the MS4 permit:

<https://go.usa.gov/x5dgr>

For “hands on” MS4 training and assistance for your community, call MassDEP's Stormwater Coordinator Fred Civian at 617-292-5821.

Massachusetts Stormwater News is a collaborative effort of MassDEP and the New England office of the U.S. EPA. Suggestions for future topics, questions or assistance, or requests to be added or removed from the Stormwater News mailing list can be sent to: StormwaterNewsMA@epa.gov.

What Must be Included in the Annual Report?

Reporting Section	What is the Requirement?	Find in the Permit
MCM 1: Public Education and Outreach	Evaluate your public education program and provide: ☐ Description of the targeted messages for each audience ☐ Method of distribution and dates of distribution (be sure to note who completed the messaging if it was done by a third party) ☐ Measures/methods used to assess the effectiveness of the messages ☐ Measures/methods used to assess the overall effectiveness of the educational program ☐ Any changes to the program	Part 2.3.2
MCM 2: Public Involvement and Participation	Provide a description of the activities used to promote public participation, including the documentation of compliance with state public notice regulations and a description of the opportunity for public involvement in the development of the SWMP.	Part 2.3.3
MCM 3: Illicit Discharge Detection and Elimination Program (IDDE)	☐ Provide a description of the activities related to your implementation of the IDDE program, including: ☐ An expeditious schedule for the elimination of illicit discharges and the date of identification when illicit discharge elimination is not possible within 60 days of identification ☐ Sanitary Sewer Overflow (SSO) Inventory and updates, including: ☐ A copy of the SSO Inventory ☐ Status of mitigation and corrective measures implemented by permittee to address each SSO identified ☐ Number of SSOs identified and removed ☐ System map completion progress (status of the system map) ☐ Status of all protocols and procedures described in Part 2.3.4 (program responsibilities and systematic procedures) ☐ Initial outfall and interconnection inventory and priority ranking to assess illicit discharge potential based on existing information/status of ranking and assessment. (Attach the data to your Annual Report or include a link to a website with the information.) ☐ Identification of outfalls and interconnections ☐ Location and condition ☐ Framework for tracking inspections, screenings, etc. ☐ Initial ranking for investigation (Problem, High, or Low) All dry and wet weather outfall screening and sampling results (Attach the data to your Annual Report or include a link to a website with the information.) ☐ Date ☐ Outfall or interconnection identifier ☐ Location ☐ Weather conditions at time of sampling, including the precipitation in previous 48 hours	Part 2.3.4

What Must be Included in the Annual Report?

Reporting Section	What is the Requirement?	Find in the Permit
MCM 3: Illicit Discharge Detection and Elimination Program (IDDE) (Cont.)	☐ Field screening parameter results ☐ Results of all analyses ☐ All data collected as part of dry and wet weather catchment investigations, including illicit discharge removal information (Attach the data to your Annual Report or include a link to a website with the information.) ☐ Number and percent of total outfall catchments served by the MS4 evaluated using the catchment investigation procedure (include identifier of each catchment evaluated). ☐ Presence or absence of System Vulnerability Factors (SVFs) in a catchment ☐ Any field screening parameter results ☐ Number of illicit discharges identified, and number removed ☐ For each confirmed source of an illicit discharge, include: ☐ Location and source ☐ Description ☐ Method and date of discovery ☐ Date of elimination, mitigation, or enforcement action OR planned corrective measures and schedule of removal ☐ Gallons of flow removed, including volume of sewage removed ☐ Identification of tracking indicators and measures of progress based on those indicators ☐ The frequency and type of employee training The Annual Report must also include the results from any other stormwater or receiving water quality monitoring or studies conducted during the reporting period where the results are being used by the permittee to inform permit compliance or permit effectiveness. If such monitoring or studies were conducted on behalf of the permittee or if monitoring or studies conducted by other entities were reported to the permittee, a brief description of the type of information gathered or received shall be included in the Annual Report(s) covering the time period(s) the information was received.	Part 2.3.4 (Cont.)
MCM 4: Construction Site Stormwater Runoff Control	Evaluate your activities related to construction runoff management, including: ☐ Number of project plans/sites reviewed ☐ Number of inspections ☐ Number of enforcement actions	Part 2.3.5

What Must be Included in the Annual Report?

Reporting Section	What is the Requirement?	Find in the Permit
MCM 5: Post-Construction Stormwater Management in New Development and Redevelopment	Evaluate your stormwater management activities related to new development and redevelopment, including: ☐ Status of ordinance development ☐ As-built drawings/procedures ☐ Report on measures utilized to meet requirements ☐ Street design and parking lots report ☐ Status of assessment, including any planned or completed changes to local regulations and guidelines ☐ Green infrastructure report ☐ Findings and progress towards making the practices allowable ☐ Status of retrofit properties inventory ☐ [Beginning with the 5th year Annual Report, identify additional permittee-owned sites and infrastructure that could be retrofitted such that the permittee maintains a minimum of 5 sites in their inventory, until such a time as when the permittee has less than 5 sites remaining] ☐ Report on all properties that have been modified or retrofitted with BMPs to mitigate impervious areas that were inventoried	Part 2.3.6
MCM 6: Good Housekeeping and Pollution Prevention for Permittee-Owned Operations	Evaluate the status of Operation & Maintenance programs and the Stormwater Pollution Prevention Program (SWPPP) ☐ Catch basin cleaning ☐ Include your inspection plan and your plan for optimizing catch basin cleaning (or your schedule for gathering information to develop the optimization plan). Include metrics and other information used to reach the determination that the established cleaning and maintenance plan is optimal for the MS4. ☐ If a catch basin sump is more than 50% full during 2 consecutive routine inspections/cleaning events, document that finding, investigate the contributing drainage area for sources of excessive sediment loading, and to the extent practicable, abate contributing sources. Report on actions taken. ☐ Include the following metrics: ☐ Total number of catch basins in system ☐ Number of catch basins inspected ☐ Number of catch basins cleaned ☐ Total volume or mass of material removed from all catch basins	Part 2.3.7

What Must be Included in the Annual Report?

Reporting Section	What is the Requirement?	Find in the Permit
MCM 6: Good Housekeeping and Pollution Prevention for Permittee-Owned Operations	☐ Street Sweeping ☐ Number of miles of street cleaned or the volume or mass of material removed from street cleaning. ☐ If applicable: rural uncurbed roadways with no catch basins ☐ Inspection, documentation, and targeted sweeping plan due within 2 years of the effective date of the permit ☐ Permittee-owned facilities ☐ Status of the inventory (Parks and Open Spaces, Buildings and Facilities, Vehicles and Equipment) and any updates ☐ Status of the Operations and Maintenance programs for permittee-owned facilities and activities, and maintenance activities associated with each ☐ Status of Stormwater Pollution Prevention Program (SWPPP) including the site inspection results ☐ Describe the status of the written procedures for winter road maintenance including storage of salt and sand	Part 2.3.7
If applicable	Water Quality-Based Effluent Limitations/Discharges to Certain Impaired Waters The Annual Report must also include an update on activities required by Part 2.1 (Water Quality-Based Effluent Limitations) and/or Part 2.2 of the permit (Discharges to Certain Impaired Waters), including the following information: ☐ Identification of all discharges determined to be causing or contributing to an exceedance of water quality standards and a description of the response including all items required by part 2.1.1 of the permit. For this you will be updating any information you included in your NOI. As examples: ☐ You may have found another waterbody to be impaired due to excess phosphorus and now need to list the discharges to that waterbody as being subject to the requirements of Appendix H. ☐ You will also need to indicate which activities you have conducted in compliance with Appendix H or Appendix F requirements. For instance, did you do a dog waste public education campaign for compliance with Appendix H or was it just for MCM 1? ☐ For discharges subject to Total Maximum Daily Load (TMDL)-related requirements, you will be indicating which BMPs were done during the reporting period in accordance with the requirements of Appendix F. You will also need to indicate progress on completion of certain plans that are required by Appendix F.	Part 2.1 and/or Part 2.2