

Year 3 Annual Report
Massachusetts Small MS4 General Permit
Reporting Period: July 1, 2020-June 30, 2021

Please DO NOT attach any documents to this form. Instead, attach all requested documents to an email when submitting the form

Unless otherwise noted, all fields are required to be filled out. If a field is left blank, it will be assumed the requirement or task has not been completed. Please ONLY report on activities between July 1, 2020 and June 30, 2021 unless otherwise requested.

Part I: Contact Information

Name of Municipality or Organization:

EPA NPDES Permit Number:

Primary MS4 Program Manager Contact Information

Name: Title:

Street Address Line 1:

Street Address Line 2:

City: State: Zip Code:

Email: Phone Number:

Stormwater Management Program (SWMP) Information

SWMP Location (web address):

Date SWMP was Last Updated:

If the SWMP is not available on the web please provide the physical address:

Part II: Self-Assessment

First, in the box below, select the impairment(s) and/or TMDL(s) that are applicable to your MS4. Make sure you are referring to the most recent EPA approved Section 303(d) Impaired Waters List which can be found here: <https://www.epa.gov/tmdl/region-1-impaired-waters-and-303d-lists-state>

Impairment(s)			
<input checked="" type="checkbox"/> Bacteria/Pathogens	<input type="checkbox"/> Chloride	<input type="checkbox"/> Nitrogen	<input checked="" type="checkbox"/> Phosphorus
<input type="checkbox"/> Solids/ Oil/ Grease (Hydrocarbons)/ Metals			
TMDL(s)			
<i>In State:</i>	<input checked="" type="checkbox"/> Assabet River Phosphorus	<input type="checkbox"/> Bacteria and Pathogen	<input type="checkbox"/> Cape Cod Nitrogen
	<input type="checkbox"/> Charles River Watershed Phosphorus	<input type="checkbox"/> Lake and Pond Phosphorus	
<i>Out of State:</i>	<input type="checkbox"/> Bacteria/Pathogens	<input type="checkbox"/> Metals	<input type="checkbox"/> Nitrogen
			<input type="checkbox"/> Phosphorus
<input type="button" value="Clear Impairments and TMDLs"/>			

Next, check off all requirements below that have been completed. **By checking each box you are certifying that you have completed that permit requirement fully.** If you have not completed a requirement leave the box unchecked. Additional information will be requested in later sections.

Year 3 Requirements

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

Optional: If you would like to describe progress made on any incomplete requirements listed above, provide any additional information, and/or if any of the above year 3 requirements could not be completed due to the impacts of COVID-19, please identify the requirement that could not be completed, any actions taken to attempt to complete the requirement, and reason the requirement could not be completed below:

Dry Weather Outfall Screening - Mapping interconnections with other MS4s (e.g., DOT) is ongoing, and it is expected that this will continue as part of DOT's own mapping efforts to be completed under a future TS4 permit. These will be inspected as they are mapped.

Update Outfall Inventory and Priority Ranking - The outfall inventory is updated through an online GIS collection and survey program as the outfalls are inspected. Due to budget constraints, the priority ranking was not updated during Year 3, but is scheduled to be updated in Year 4 and will be completed before catchment investigations commence.

Stormwater Bylaw - The Town adopted a new Municipal Separate Storm Sewer System Bylaw and Illicit Discharge Detection and Elimination By-Law on June 7, 2021. The bylaws are consistent with the MS4 Permit requirements.

Annual Requirements

- Provided an opportunity for public participation in review and implementation of SWMP and complied with State Public Notice requirements
- Kept records relating to the permit available for 5 years and made available to the public
- The SSO inventory has been updated, including the status of mitigation and corrective measures implemented
 - This is not applicable because we do not have sanitary sewer
 - This is not applicable because we did not find any new SSOs
 - The updated SSO inventory is attached to the email submission
 - The updated SSO inventory can be found at the following website:
- Properly stored and disposed of catch basin cleanings and street sweepings so they did not discharge to receiving waters
- Provided training to employees involved in IDDE program within the reporting period
- All curbed roadways were swept at least once within the reporting period
- Updated system map due in year 2 as necessary
- Enclosed all road salt storage piles or facilities and implemented winter road maintenance procedures to minimize the use of road salt
- Implemented SWPPPs for all permittee owned or operated maintenance garages, public works yards, transfer stations, and other waste handling facilities
- Updated inventory of all permittee owned facilities as necessary
- O&M programs for all permittee owned facilities have been completed and updated as necessary
- Implemented all maintenance procedures for permittee owned facilities in accordance with O&M programs
- Implemented program for MS4 infrastructure maintenance to reduce the discharge of pollutants
- Inspected all permittee owned treatment structures (excluding catch basins)

Optional: If you would like to describe progress made on any incomplete requirements listed above, provide any additional information, and/or if any of the above annual requirements could not be completed due to the impacts of COVID-19, please identify the requirement that could not be completed, any actions taken to attempt to complete the requirement, and reason the requirement could not be completed below:

Bacteria/ Pathogens (Combination of Impaired Waters Requirements and TMDL Requirements as Applicable)

Annual Requirements

*Public Education and Outreach**

- Annual message was distributed encouraging the proper management of pet waste, including noting any existing ordinances where appropriate

- Permittee or its agents disseminated educational material to dog owners at the time of issuance or renewal of dog license, or other appropriate time
 - Provided information to owners of septic systems about proper maintenance in any catchment that discharges to a water body impaired for bacteria
- * Public education messages can be combined with other public education requirements as applicable (see Appendix H and F for more information)*

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

Phosphorus (Combination of Impaired Waters Requirements and TMDL Requirements as Applicable)

Annual Requirements

*Public Education and Outreach**

- Distributed an annual message in the spring (April/May) encouraging the proper use and disposal of grass clippings and encouraging the proper use of slow-release and phosphorus-free fertilizers
- Distributed an annual message in the summer (June/July) encouraging the proper management of pet waste, including noting any existing ordinances where appropriate
- Distributed an annual message in the fall (August/September/October) encouraging the proper disposal of leaf litter

** Public education messages can be combined with other public education requirements as applicable (see Appendix H and F for more information)*

Good Housekeeping and Pollution Prevention for Permittee Owned Operations

- Increased street sweeping frequency of all municipal owned streets and parking lots subject to Permit part 2.3.7.a.iii.(c) to a minimum of two times per year (spring and fall)

Potential structural BMPs

Any structural BMPs already existing or installed in the regulated area by the permittee or its agents was tracked and the phosphorus removal by the BMP was estimated consistent with Attachment 3 to Appendix F. The BMP type, total area treated by the BMP, the design storage volume of the BMP and the estimated phosphorus removed in mass per year by the BMP were documented.

- The BMP information is attached to the email submission
- The BMP information can be found at the following website:

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:

Increased Street Sweeping - All roads were swept once and main roads and high priority roads were swept twice during the Year 3 period. 75 miles of roadway were swept between the two sweeping events. High priority roads include those within an MS4 catchment area that discharge directly to a phosphorus impaired water or its tributary vs. those that discharge into a wooded area, BMP or other upgradient area.

Potential Structural BMPs - Town-owned BMPs have been inventoried. Due to budget constraints, phosphorus loads and removals from existing BMPs have not yet been calculated, but are planned to be completed in Permit Year 4.

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:

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:Pet Waste Mailing

Message Description and Distribution Method:

The "Do Your "Doody" for Clean Water" fact sheet prepared by ThinkBlue Massachusetts was mailed to all Clinton water customers along with dog bylaws.

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

Mailing sent to all residents in Town (~4200 properties).

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:Pet Waste Management with Dog Licenses

Message Description and Distribution Method:

The one page "By Laws for Dog Owners for the Town of Clinton" was distributed to dog owners when they renewed their dog's licenses. The bylaws outline the requirements for removing excrement left by dogs and fines for failure to do so. The bylaws are also posted on the Town's website with information on dog licenses.

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

Bylaws distributed to all dog owners during license renewal.

Message Date(s): Dog license renewal due by April 1, 2021; Ongoing on website

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:Leaf Litter Mailing

Message Description and Distribution Method:

The "Be a Leaf Hero" flyer was mailed to all Clinton water customers. It defines stormwater pollution and provides education on managing fallen leafs to keep the out of the drainage system.

Targeted Audience: Residents, Businesses, institutions and commercial facilities

Responsible Department/Parties: DPW

Measurable Goal(s):

Mailing sent to all residents and businesses (~4200 mailings).

Message Date(s): August 2020

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:Yard Care Mailing

Message Description and Distribution Method:

The "Be A Yard Hero" flyer, "Greenscapes guide to Lawn Care" flyer, and "Green Grass & Clear Water" flyer were mailed to all Clinton water customers. They provide education on lawn care and fertilizer and pesticide use to keep chemicals out of stormwater runoff.

Targeted Audience: Residents, Businesses, institutions and commercial facilities

Responsible Department/Parties: DPW

Measurable Goal(s):

Mailing to all residents and businesses (~4200 mailings).

Message Date(s): Be a Yard Hero - February 2021; Green Grass/Clean Water - May 2021

Message Completed for: Appendix F Requirements Appendix H Requirements

Was this message different than what was proposed in your NOI? Yes No

If yes, describe why the change was made:

BMP:School Curricula - Watershed Protection and Pollution Prevention

Message Description and Distribution Method:

Stormwater education is incorporated into the school curricula and covers topics including watershed protection and pollution prevention, stormwater management, stream protection, and impacts on water quality.

Targeted Audience: Residents

Responsible Department/Parties: Schools

Measurable Goal(s):

Continued education to various grade levels.

Message Date(s): Ongoing

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:Surface and Groundwater Pollution Prevention

Message Description and Distribution Method:

Clinton continuously displays fact sheets/brochures on surface and groundwater pollution at Town Hall.

Targeted Audience: Residents

Responsible Department/Parties: DPW

Measurable Goal(s):

Display materials at Town Hall.

Message Date(s): Continuous display

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:Construction Impacts Poster and Flyers

Message Description and Distribution Method:

Clinton continuously displays a poster outlining the impacts of construction on stormwater runoff at Town Hall. Flyers are also available outlining information on erosion control, LID and the CGP Permit.

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

Message Date(s):

Message Completed for: Appendix F Requirements Appendix H Requirements

Was this message different than what was proposed in your NOI? Yes No

If yes, describe why the change was made:

BMP:Septic System Maintenance Mailing & Poster

Message Description and Distribution Method:

A letter was mailed in March to all property owners informing them that they are required to maintain their septic systems. The Town also displays posters in the Town Hall regarding septic system maintenance.

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

Message Date(s):

Message Completed for: Appendix F Requirements Appendix H Requirements

Was this message different than what was proposed in your NOI? Yes No

If yes, describe why the change was made:

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:**

SWMP Plan for Download - The Town has posted the SWMP Plan on the Town website along with contact information to allow for public comment.

The Town continues to allow yard waste drop off at a Town facility.

DPW employees performed periodic cleanups throughout the year. There was a community cleanup day held in April. The Excel Club and community volunteers held a town-wide cleanup. About 30 bags of trash were collected.

Clinton is a member Town for the Devens Regional Household Hazardous Products Collection Center. The center is open to member Towns the first Wednesday and Saturday of the month from March to December.

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:**

MCM3: Illicit Discharge Detection and Elimination (IDDE)

Sanitary Sewer Overflows (SSOs)

Check off the box below if the statement is true.

This SSO section is NOT applicable because we DO NOT have sanitary sewer

*Below, report on the number of SSOs identified in the MS4 system and removed **during this reporting period.***

Number of SSOs identified:

Number of SSOs removed:

MS4 System Mapping

Optional: Provide additional status information regarding your map:

Mapping interconnections with other MS4s (e.g., DOT) is ongoing, and it is expected that this will continue as part of DOT's own mapping efforts to be completed under a future TS4 permit.

Screening of Outfalls/Interconnections

If conducted, please submit any outfall monitoring results from this reporting period. Outfall monitoring results should include the date, outfall/interconnection identifier, location, weather conditions at time of sampling, precipitation in previous 48 hours, field screening parameter results, and results from all analyses. Please also include the updated inventory and ranking of outfalls/interconnections based on monitoring results.

- No outfalls were inspected
- The outfall screening data is attached to the email submission
- The outfall screening data can be found at the following website:

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

Number of outfalls screened:

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

Percent of outfalls screened:

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

As of June 30, 2021, the Town attempted to inspect all 157 known stormwater outfalls (includes 2 new outfalls located during inspections) within the urbanized area during dry weather. Of the 157 stormwater outfalls that were attempted to be inspected, 120 were located. Where outfalls could not be found (31 locations), the upgradient structure was inspected for the presence of dry weather flows. Flows were found at 103 outfall/proxy structure locations. It was determined that 3 of the mapped outfalls may not exist as neither the outfall or the drainage network could be found. The number of outfalls screened in Year 2 was misreported. There were 68 outfalls screened in Year 2 and 86 in Year 3 for a total of 154 (the remaining 3 are believed to not exist as outlined above). Mapping interconnections with other MS4s (e.g., DOT) is ongoing, and it is expected that this will continue as part of DOT's own mapping efforts to be completed under a future TS4 permit. Inspections will be performed once mapped.

Catchment Investigations

If conducted, please submit all data collected during this reporting period as part of the dry and wet weather investigations. Also include the presence or absence of System Vulnerability Factors for each catchment.

- No catchment investigations were conducted
- The catchment investigation data is attached to the email submission
- The catchment investigation data can be found at the following website:

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

Number of catchment investigations completed this reporting period:

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

Percent of total catchments investigated:

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

No catchment investigations were completed, however, the Town did perform follow-up inspections for three outfalls that met likely sewage input benchmarks to attempt to isolate the source of dry weather flows.

IDDE Progress

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

- No illicit discharges were found
- The illicit discharge removal report is attached to the email submission
- The illicit discharge removal report can be found at the following website:

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:

Employee Training

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

Employee training was performed on June 9, 2021 and included IDDE training and SWPPP/SPCC training for the DPW Garage and Recycling Center.

MCM4: Construction Site Stormwater Runoff Control

*Below, report on the construction site plan reviews, inspections, and enforcement actions completed **during this reporting period.***

Number of site plan reviews completed:

Number of inspections completed:

Number of enforcement actions taken:

Optional: Enter any additional information relevant to construction site plan reviews, inspections, and enforcement actions:

There were no projects disturbing over one acre of land during this reporting period.

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

As-built Drawings

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

Number of as-built drawings received:

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

There were no projects disturbing over 1 acre of time during this reporting period.

Street Design and Parking Lots Report

Describe the status of the street design and parking lots assessment due in year 4 of the permit term, including any planned or completed changes to local regulations and guidelines:

N/A, to be completed during Permit Year 4.

Green Infrastructure Report

Describe the status of the green infrastructure report due in year 4 of the permit term, including the findings and progress towards making the practice allowable:

N/A, to be completed during Permit Year 4.

Retrofit Properties Inventory

Describe the status of the inventory, due in year 4 of the permit term, of permittee-owned properties that could be modified or retrofitted with BMPs to mitigate impervious areas and report on any properties that have been modified or retrofitted:

The Town completed an inventory of its permittee-owned properties. Facilities will be evaluated for potential BMP retrofit opportunities during Year 4.

MCM6: Good Housekeeping

Catch Basin Cleaning

*Below, report on the number of catch basins inspected and cleaned, along with the total volume of material removed from the catch basins **during this reporting period**.*

Number of catch basins inspected:

Number of catch basins cleaned:

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

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

Total number of catch basins:

If applicable:

Report on the actions taken if a catch basin sump is more than 50% full during two consecutive routine inspections/cleaning events:

Not yet applicable. The Town is tracking its catch basin cleaning and sediment accumulation in catch basins using the GIS-based platform developed during Year 2 and will use this to track trends to help optimize its 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: 75

Volume of material removed: [] [Select Units]

Weight of material removed: 247.84 tons

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: 3

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

Three formal written SWPPP inspections were performed in Permit Year 3, however, informal inspections are performed routinely by staff as part of operations when the facility is open.

Additional Information

Monitoring or Study Results

Results from any other stormwater or receiving water quality monitoring or studies conducted during the reporting period not otherwise mentioned above, where the data is being used to inform permit compliance or permit effectiveness must be attached.

- Not applicable
- The results from additional reports or studies are attached to the email submission
- The results from additional reports or studies can be found at the following website(s):

[]

If such monitoring or studies were conducted on your behalf or if monitoring or studies conducted by other entities were reported to you, a brief description of the type of information gathered or received shall be described below:

[]

Additional Information

Optional: Enter any additional information relevant to your stormwater management program implementation during the reporting period. Include any BMP modifications made by the MS4 if not already discussed above:

[]

COVID-19 Impacts

Optional: If any of the above year 3 requirements could not be completed due to the impacts of COVID-19, please identify the requirement that could not be completed, any actions taken to attempt to complete the requirement, and reason the requirement could not be completed below:

School field trips that involve environmental education, including the 3rd grade field trip to Wachusett Meadow, the 5th grade canoe trip on the Nashua River and the 6th grade Nature's Classroom were cancelled due to COVID-19.

Activities Planned for Next Reporting Period

Please confirm that your SWMP has been, or will be, updated to comply with all applicable permit requirements including but not limited to the year 4 requirements summarized below. (Note: impaired waters and TMDL requirements are not listed below)

Yes, I agree

- Develop a report assessing current street design and parking lot guidelines and other local requirements within the municipality that affect the creation of impervious cover
- Develop a report assessing existing local regulations to determine the feasibility of making green infrastructure practices allowable when appropriate site conditions exist
- Identify a minimum of 5 permittee-owned properties that could potentially be modified or retrofitted with BMPs to reduce impervious areas

Annual Requirements

- Annual report submitted and available to the public
- Annual opportunity for public participation in review and implementation of SWMP
- Keep records relating to the permit available for 5 years and make available to the public
- Properly store and dispose of catch basin cleanings and street sweepings so they do not discharge to receiving waters
- Annual training to employees involved in IDDE program
- Update inventory of all known locations where SSOs have discharged to the MS4
- Continue public education and outreach program
- Update outfall and interconnection inventory and priority ranking and include data collected in connection with the dry weather screening and other relevant inspections conducted
- Implement IDDE program
- Review site plans of construction sites as part of the construction stormwater runoff control program
- Conduct site inspection of construction sites as necessary
- Inspect and maintain stormwater treatment structures
- Log catch basins cleaned or inspected
- Sweep all curbed streets at least annually
- Continue investigations of catchments associated with Problem Outfalls
- Implemented SWPPPs for all permittee owned or operated maintenance garages, public works yards, transfer stations, and other waste handling facilities

- Review inventory of all permittee owned facilities in the categories of parks and open space, buildings and facilities, and vehicles and equipment; update if necessary
- Review O&M programs for all permittee owned facilities; update if necessary
- Implement all maintenance procedures for permittee owned facilities in accordance with O&M programs
- Implement program for MS4 infrastructure maintenance to reduce the discharge of pollutants
- Enclose all road salt storage piles or facilities and implemented winter road maintenance procedures to minimize the use of road salt
- Review as-built drawings for new and redevelopment to ensure compliance with post construction bylaws, regulations, or regulatory mechanism consistent with permit requirements
- Inspect all permittee owned treatment structures (excluding catch basins)

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

In addition to the above Year 4 activities, Clinton will update its SWMP to incorporate the progress made on its MS4 program.

Part V: Certification of Small MS4 Annual Report 2021

40 CFR 144.32(d) Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, I certify that the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Name: Title:

Signature: Date:

[Signatory may be a duly authorized representative]