

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

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

*Unless otherwise noted, all fields are required to be filled out. If a field is left blank, it will be assumed the requirement or task has not been completed. Please ONLY report on activities between July 1, 2023 and June 30, 2024 unless otherwise requested.*

**Part I: Contact Information**

Name of Municipality or Organization:

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 (publicly available web address):

Date SWMP was Last Updated:

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

## Part II: Self-Assessment

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

**Impairment(s)**

Bacteria/Pathogens       Chloride       Nitrogen       Phosphorus  
 Solids/ Oil/ Grease (Hydrocarbons)/ Metals

**TMDL(s)**

*In State:*       Assabet River Phosphorus       Bacteria and Pathogen       Cape Cod Nitrogen  
 Charles River Watershed Phosphorus       Lake and Pond Phosphorus

*Out of State:*       Bacteria/Pathogens       Metals       Nitrogen       Phosphorus

Clear Impairments and TMDLs

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

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:

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

#### Annual Requirements

##### *Public Education and Outreach\**

- Annual message was distributed encouraging the proper management of pet waste, including noting any existing ordinances where appropriate
- Permittee or its agents disseminated educational material to dog owners at the time of issuance or renewal of dog license, or other appropriate time
- Provided information to owners of septic systems about proper maintenance in any catchment that discharges to a water body impaired for bacteria
  - This is not applicable because there are no septic systems present

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

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

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

#### Annual Requirements

##### *Public Education and Outreach\**

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

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

*Good Housekeeping and Pollution Prevention for Permittee Owned Operations*

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

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

All roads were swept once and main roads and high priority roads were swept twice during the Year 6 period. 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.

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*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:

Changes to Impairments or TMDLs Since NOI:

Nashua River ("South Branch") from Clinton WWTP to Confluence with North Nashua River, Lancaster (MA81-09): Phosphorus (Total) impairment removed from 2018 303(d) list, however, the downstream segment in the adjacent town is still impaired for phosphorus.

Wachusett Reservoir (MA81147): wasn't included in the NOI (Clinton's MS4 doesn't discharge to it), however, is impaired for Eurasian Water Milfoil, Myriophyllum spicatum, Non-Native Aquatic Plants, Mercury (all impairments present at time of NOI) and Brittle Naiad, Najas Minor and Fanwort (added in 2018/2022). Mercury is not associated with stormwater runoff and all other impairments are considered non-pollutants not requiring a TMDL.

## 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 (~4,200 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 Mailing 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, 2024; 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 leaves to keep them 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 (~4,200 mailings) and made available at the recycling center.

Message Date(s): November 2023

Message Completed for: Appendix F Requirements  Appendix H Requirements

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

If yes, describe why the change was made:

### **BMP: Yard Care Mailing**

Message Description and Distribution Method:

A flyer on lawn fertilizer was 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 sent to all residents and businesses (~4,200 mailings).

Message Date(s): Lawn fertilizer flyer - February 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: 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): Continuous / 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:

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.

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

Percent of Phase II map complete:

*Optional:* Provide additional status information regarding your map:

All known outfalls, stormwater BMPs, and receiving waterbodies with impairments have been mapped to date. Initial catchment delineations have also been completed based on topographic mapping and available stormwater system information, and are being refined as additional field information is collected during catchment investigations. The Town has also substantially mapped catch basins and manholes, and is working to complete mapping of piping connectivity. Mapping of open channel conveyances and 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. The Town is also working to identify data gaps in its drainage mapping (e.g., catch basins without piping, disconnected drainage networks, etc.) and is actively mapping and investigating these. Any new infrastructure discovered through this process will be mapped and screened as necessary by the end of Year 10.

#### 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:*

Outfalls were screened during previous permit years; no additional outfalls were screened during Year 6. As/if additional outfalls are located, they are screened during dry weather for potential illicit discharges.

### **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:

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

Number of catchment investigations completed this reporting period:

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

Percent of total catchments investigated:

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

### **IDDE Progress**

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

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

[Empty box]

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:

[Empty box]

**Employee Training**

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

Employee training was performed on April 22, 2024 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:

[Empty box]

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

### **Ordinance or Regulatory Mechanism**

Date update was completed (due in year 3):

Website of ordinance or regulatory mechanism:

### **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:

### **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:

No changes to date. To be determined pending discussions with other departments. Estimated June 30, 2027.

### **Green Infrastructure Report**

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

No changes to date. To be determined pending discussions with other departments. Estimated June 30, 2027.

**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. Clinton Water Works/ Municipal Garage/ Recycling Center- 99 Woodlawn Street
2. Woodlawn Cemetery- 2 Woodlawn Street
3. Clinton Housing Authority- 58 Fitch Road
4. Municipal buildings- 2 Fox Run Drive
5. Fire Station- 559 Main Street

The full list of properties evaluated and identified for retrofit opportunities is included as an appendix to the Phosphorus Source Identification Plan.

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.

No properties have been modified or retrofitted with BMPs to date. However, the Town anticipates installing a public demonstration BMP at the DPW Facility during Permit Year 7.

**MCM6: Good Housekeeping**

**Catch Basin Cleaning**

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

Number of catch basins inspected:

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:

[Empty text box]

**Street Sweeping**

Report on street sweeping completed **during this reporting period** using one of the three metrics below.

- Number of miles cleaned:
- Volume of material removed:  [Select Units]
- Weight of material removed:

**Stormwater Pollution Prevention Plan (SWPPP)**

Below, report on the number of site inspections for facilities that require a SWPPP completed **during this reporting period**.

Number of site inspections completed:

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

Not applicable, no corrective actions have been taken to date.

**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):

[Empty text box]

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:

[Empty text box]

**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.

## Year 7

### **Activities Planned for Next Reporting Period**

Please confirm that your SWMP has been, or will be, updated to comply with all applicable permit requirements including but not limited to the year 7 requirements summarized below. (Note: impaired waters and TMDL requirements are not listed below)

Yes, I agree

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

### **Annual Requirements**

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

- Review O&M programs for all permittee owned facilities; update if necessary
- Implement all maintenance procedures for permittee owned facilities in accordance with O&M programs
- Implement program for MS4 infrastructure maintenance to reduce the discharge of pollutants
- Enclose all road salt storage piles or facilities and implemented winter road maintenance procedures to minimize the use of road salt
- Review as-built drawings for new and redevelopment to ensure compliance with post construction bylaws, regulations, or regulatory mechanism consistent with permit requirements
- Inspect all permittee owned treatment structures (excluding catch basins)
- Identify additional permittee-owned properties that could potentially be modified or retrofitted with BMPs to reduce impervious areas so that the permittee maintains a minimum of 5 sites in their inventory, until such a time when the permittee has less than 5 sites remaining

Provide any additional details on activities planned for permit year 7 below:

## Part V: Certification of Small MS4 Annual Report 2023

### 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]*