

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)

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 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:

In Permit Year 3, the Town updated the Stormwater Management Bylaw at Town Meeting on June 12, 2021. The bylaw is currently under review by the Attorney General's office. Associated regulations were drafted as part of the Northern Middlesex Stormwater Collaborative (NMSC) "Capacity Building for Local Oversight of Development and Redevelopment Projects" project funded through a 2019-2020 MS4 Municipal Assistance Grant. The new bylaw meets EPA's updated post-construction requirements in the 2016 General Permit. Upon approval of the updated bylaw the Planning Board will review and adopt the regulations to clarify implementation for applicants.

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:

The Town's "Good Housekeeping and Pollution Prevention Program for Municipal Operations and Maintenance" includes maintenance procedures for Town facilities and MS4 infrastructure, which are implemented to the maximum extent practicable.

The Town plans to develop a digital BMP tracking form in PY4 to efficiently track all town-owned BMP inspections.

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:

The Town Clerk plans to provide pet waste educational materials for dog owners during licensing renewal in PY4. Pet waste education is happening through a variety of other messages in Town.

The Town provided a link on the stormwater webpage to NMSC's website which includes detailed information on proper septic system maintenance. Additionally, LEWLD posted a video on its website on stormwater management, which highlights how to properly maintain your septic system.

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

N/A

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:

No known municipal BMPs were installed in the Long Lake Watershed after the permit issuance date and therefore this requirement is not applicable. Moving forward the Town will track and calculate the above information for any structural BMPs installed within the watershed.

Solids, Oil and Grease (Hydrocarbons), or Metals

Annual Requirements

Good Housekeeping and Pollution Prevention for Permittee Owned Operations

- Increased street sweeping frequency of all municipal owned streets and parking lots to a schedule that targets areas with potential for high pollutant loads
- 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:

Only 4 catch basin sumps were more than 50% full this Permit Year. These will be flagged for more frequent cleaning if they do not improve in PY4.

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:

During Permit Year 3 the Town modified its outfall mapping by adding three (3) outfalls and removing nine (9) previously listed outfalls resulting in a total of 274 MS4 regulated outfalls in Town. The nine (9) outfalls were removed from the inventory because they did not exist, were another stormwater asset or they were determined to be owned by the State. These modifications did not add or change any receiving waters or impairments/TMDLs listed in the NOI and as updated in Permit Year 2 Annual Report to reflect the updated 303(d) List.

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:1A-1C: Education and Outreach to Residents, Developers, Institutions, Businesses, and Commercial

Message Description and Distribution Method:

1. Littleton Electric Light & Water Department (LELWD) posted a video (<https://www.lclwd.com/source-water-protection/>) on stormwater runoff by the Northern Middlesex Stormwater Collaborative (NMSC) to its website. The educational video for the public covers pesticides, fuel, pet waste, car washing, paint, cleaning agents, and septic system management. The LELWD website also includes a link to Littleton's Low Impact Design/Best Management Practices Manual. (Same messaging as last year).
2. Littleton's Stormwater website includes a link to NMSC's website, which includes videos and other educational information for residents, businesses, and developers on stormwater and how they can reduce their contributions to polluting stormwater runoff, proper yard waste disposal (including leaves and grass clippings), lawn care and use of fertilizers, use of phosphate free/biodegradable soaps for car washing, pet waste management, and proper care of septic systems. (Same messaging as last year).
3. The Town has a stormwater webpage that includes links to the Town's SWMP, stormwater reports, stormwater presentations, bylaws and regulations, and other stormwater-related educational tools for the public to access. The webpage includes a PDF and links for best lawn care practices to reduce polluting stormwater runoff and proper lawn care techniques (grass clippings, fertilizers, and water conservation). Included in one of the links is to the Think Blue Massachusetts educational advertisement.
4. The Town shared a link to their Stormwater website on Facebook on March 17, 2021. This link leads residents to the educational materials listed in item number 3 above.
5. Stormwater educational materials are provided to visitors outside of the Littleton Conservation Commission office. Topics include stormwater pollution from pet waste, illicit discharges, and fertilizers.

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

Messaging is available to all audiences on the Stormwater, Facebook, and LELWD webpages. The Town's Facebook post on fertilizer use and proper lawn care, linking to the Town's Stormwater webpage, received 9 likes and 1 share. In this reporting period, the Littleton Stormwater Webpage had a total of 249 page views and the SWMP Plan had 66 views.

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: 1A: Resident Message - Stormwater pollution is trash, oil, cigarette butts, & dog waste

Message Description and Distribution Method:

Think Blue Massachusetts "Fowl Water" video (www.thinkbluemassachusetts.org) advertisement was linked through the Town's Stormwater webpage, which was shared on Facebook. The "Fowl Water" ad helps to visualize stormwater pollution from motor oil, pet waste, and trash.

Targeted Audience: Residents

Responsible Department/Parties: Northern Middlesex Stormwater Collaborative

Measurable Goal(s):

14,237 social media impressions from residents of Littleton over 700,000 within Northern Middlesex Stormwater Collaborative region, and over 7 million impressions across Massachusetts.

Message Date(s): May 2020 on Facebook

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: 1A Rain Barrel Discount

Message Description and Distribution Method:

A rain barrel discount program is run by LELWD and The Great American Rain Barrel Company. LELWD customers were reminded of this discount program on Facebook.

Targeted Audience: Residents

Responsible Department/Parties: LELWD

Measurable Goal(s):

37 Rain Barrels were purchased this year.
The LELWD Facebook post on rain barrel purchasing, received 9 likes, 6 comments and 1 share.

Message Date(s): June 30, 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:

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:**

The Stormwater Management Plan (SWMP) and Annual Reports were posted for ongoing public review on the Town's website; including instructions for residents to provide comments or input on the plan.

As part of the development and adoption of the updated Stormwater Management Bylaw, the public was able to comment on the SWMP at Town Meeting on June 12, 2021 where the bylaw was presented and adopted.

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:**

Littleton's Annual Community Cleanup Day was canceled for a second year in a row due to COVID-19 impacts.

Littleton residents can bring their household hazardous waste to Devens Regional Household Hazardous Products Collection Center for a small fee on the first Wednesday and following Saturday of each month. (ongoing)

On January 3, 2021, the Littleton Fire Department provided a Christmas Tree disposal service for all interested Town residents for a \$10 donation.

The Clean Lakes Committee is still holding meetings and performed sampling in 2020 and 2021.

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:

The Town continues to refine the MS4 GIS mapping as the IDDE Program is implemented and field investigations are completed. Including adding new outfalls, tracking catch basin cleaning, and updating incorrectly mapped features.

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:

In Permit Year 3, the Town and their stormwater consultant completed outfall investigations to screen outfalls that had not been visited in a previous Permit Year and also attempted to field verify outfalls that could not be located during previous field efforts. All 274 known MS4 outfalls have been successfully screened to date.

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:

Catchment investigations are scheduled to begin in High Priority catchments in PY4. There are no problem catchments.

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:

There were no known discharges of sanitary wastewater, reports of illegal dumping or spills to the MS4 this permit year.

Employee Training

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

An annual IDDE refresher training was conducted for 4 Highway Department staff that implement the IDDE program on September 22 and 25, 2020.

One SWPPP training was conducted online for three Highway Department staff on March 31, 2021.

*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:

The above totals include site plan review, inspections, and enforcement actions performed by the Planning Board and Conservation Commission in Permit Year 3. These totals include some properties under an acre. While there were no formal enforcement actions, Town staff often note minor corrective actions that the owner/contractor resolves without the need to escalate to enforcement under local code.

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:

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:

The Town plans to complete this requirement in PY4.

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:

The Town plans to complete this requirement in PY4.

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 plans to complete this requirement in PY4.

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:

This is unusual since the Town uses salt for deicing. Only 4 catch basins had sumps more than 50% full this Permit Year. These will be flagged for more frequent cleaning if they do not improve in PY4.

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:

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:

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:

The Littleton Clean Lakes Committee performs ongoing surface water quality monitoring in Littleton that informs the Stormwater Management Program. The 2020 and 2021 sampling results are attached.

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:

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:

The Town acknowledges the General Permit Year 4 requirements and will complete as many activities as possible based on funding and staff availability.

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]