

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:

The Town of Milford has screened all outfalls and interconnections except eight (8) outfalls that discharge into a culverted section of the Charles River. The Town is in the process of contracting with field staff trained to enter culverts.

Updates to the outfall/interconnection priority ranking was completed in August 2021.

A consulting company reviewed the Town's post-constructed stormwater bylaws. The Town is in the process of developing revisions to those bylaws.

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:

N/A

- 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 annual IDDE training was delayed due to COVID-19, but has been scheduled.

The Town has temporarily stored a salt stockpile outside their Salt Shed. The Salt Shed requires a new roof that will be completed in fall 2021, at which time all the salt will be stored fully enclosed in the Salt Shed.

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 is working on a program in order to provide educational materials to dog owners at the time of issuance or renewal of dog licenses. Currently, the Town posts dog waste information and dog waste bags at parks, fields, and bike paths throughout Town.

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:

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:

The Charles River Watershed Association (CRWA) developed a Subwatershed Restoration Plan for Milford, published on December 30, 2020. Additionally, the Town is working on their own Phosphorus Control Plan.

Charles River Watershed Phosphorus TMDL

- Completed the funding source assessment

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:

As mentioned above, the Town is working on their own Phosphorus Control Plan that includes an estimated budget for compliance with the Phosphorus TMDL requirements. Additionally, the Town is in the process of evaluating the implementation of a stormwater user fee that can acquire more funds to be used partially for this work.

Optional: Use the box below to provide any additional information you would like to share as part of your self-assessment:

N/A

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:

The Town's MS4 outfall inventory was 199 outfalls on their NOI. After conducting dry weather screenings and mapping updates this year, the new outfall inventory is 248 outfalls.

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: Proper Stormwater Management

Message Description and Distribution Method:

"The Scoop on Stormwater" video and flyer were posted to the Town of Milford's website to educate residents on proper stormwater management techniques. Original post from the EPA.

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

Distribute at least two educational messages within the permit term.

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: Stormwater Education for Students

Message Description and Distribution Method:

The Charles River Watershed Association (CRWA) presented about the Milford Town Park Green Stormwater Infrastructure project to over 1,000 students at the Stacy Middle School. Students learned what a watershed was, where they are located within the Charles River Watershed, and about how stormwater runoff brings pollution into the river, degrading water quality. They also learned about the nature-based solution to this pollution, green stormwater infrastructure, how it works, and that it would be installed in their local park.

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

Distribute at least two educational messages within the permit term.
Involve the community in the development of the Milford Town Park Green Stormwater Infrastructure project.

Message Date(s): 5/28/21

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:

This outreach arose during the development of the Town Park Green Stormwater Infrastructure project.

BMP: Winter Proper Salt Use Method

Message Description and Distribution Method:

Think Blue Massachusetts shared posts on Facebook regarding the proper storage and application rates of winter deicing material.

Targeted Audience: Residents

Responsible Department/Parties: Think Blue Massachusetts and the Town of Milford

Measurable Goal(s):

Distribute at least two messages to each targeted audience during the permit term.

Message Date(s): 1/11/21

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:

This outreach was developed by Think Blue to supplement outreach already listed on Milford's NOI.

BMP: Spring Leaf Clippings & Fertilizer Use

Message Description and Distribution Method:

Think Blue Massachusetts shared posts on Facebook in the spring encouraging the proper use and disposal of grass clippings and encouraged the proper use of slow-release fertilizers.

Targeted Audience: Residents

Responsible Department/Parties: Think Blue Massachusetts and the Town of Milford

Measurable Goal(s):

Distributed in accordance with the Town of Milford's phosphorus TMDL and impairment requirements.

Message Date(s): 4/1/21, 4/6/21, 4/7/21, 4/8/21, 4/9/21, 4/15/21

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:

N/A

BMP: Summer Dog Waste Message

Message Description and Distribution Method:

Think Blue Massachusetts shared posts on Facebook in summer to encourage proper pet waste management.

Targeted Audience: Residents

Responsible Department/Parties: Think Blue Massachusetts and the Town of Milford

Measurable Goal(s):

Distributed in accordance with the Town of Milford's phosphorus and bacteria/pathogens TMDL and impairment requirements.

Message Date(s): 3/16/21, 3/30/21, 4/15/21, 4/20/21, 6/17/21, 6/30/21

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:

N/A

BMP: Fall Leaf Litter Message

Message Description and Distribution Method:

Think Blue Massachusetts shared posts on Facebook in fall to encourage proper management of leaf litter.

Targeted Audience: Residents

Responsible Department/Parties: Think Blue Massachusetts and the Town of Milford

Measurable Goal(s):

Distributed in accordance with the Town of Milford's phosphorus TMDL and impairment requirements.

Message Date(s): 10/5/20

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:

N/A

BMP: Septic System Message

Message Description and Distribution Method:

Think Blue Massachusetts shared posts on Facebook regarding Septic Smart week to provide information to owners of septic systems about proper maintenance.

Targeted Audience: Residents

Responsible Department/Parties: Think Blue Massachusetts and the Town of Milford

Measurable Goal(s):

Distributed in accordance with the Town of Milford's bacteria and pathogens TMDL and impairment requirements.

Message Date(s): 9/16/20

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:

N/A

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:

Annual review of SWMP. Plan is posted on the Town of Milford's website with a public comment form.

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:**

Milford supported shoreline clean-ups along the Charles River, hosted semi-annual hazardous waste collection days, and ran recycling advertising.

To celebrate Earth Day 2021, the Milford Republican Town Committee held a Plant-a-Tree seeding sale at Plains Park Pavilion on Saturday April 24. Also on this day, the Town hosted its sixth annual Town Earth Day Beautification Day, where volunteers picked up litter in the downtown area. Over 100 people volunteered.

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 of outfalls, open channel conveyances, interconnections, and BMPs were refined during Year 3. Open channel conveyances, interconnections, and BMPs were field-verified.

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:

10 interconnections were screened and 58 outfalls were screened in Year 3. Of the 248 outfalls within the MS4 area of Milford, 240 have been screened. Eight outfalls remain that discharge to a culverted section of the Charles River. The Town is in the process of contracting field staff to screen those remaining outfalls.

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:

5 catchments were investigated during August 2021.

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:

N/A

Employee Training

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

Annual IDDE employee training was delayed due to COVID-19. However, it has been scheduled.

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:

Site inspections conducted were a mix of new construction, redevelopment projects, erosion control, and septic system installations.

The Planning and Engineering Department issued at least 50 directives and communications to construction site projects.

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:

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:

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:

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:

The Town cleans basins in low lying areas after significant rain fall events, which is approximately 10% of all basins.

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:

N/A

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):

https://www.crwa.org/uploads/1/2/6/7/126781580/crwa_subwatershed_restoration_plan_12-30-20.pdf

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 Charles River Watershed Association developed a Subwatershed Restoration Plan for Milford, MA, published on December 30, 2020.

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:

The Highway Department installed, rebuilt, or repaired 189 catch basins. Also, they installed or rebuilt drainage totaling 4,230 linear feet of variously sized pipe.

The Town removed 8,880 cubic yards of leaves during their annual leaf pickup program.

The Town of Milford was awarded nearly \$500,000 as part of a climate resiliency grant with the Charles River Watershed Association. With these funds, green infrastructure - including 2 rain gardens and an infiltration chamber - will be installed at Milford's Town Park. Construction is set to begin in 2022. Attached to this annual report is a project summary.

In Year 3, the Town received funds from the Federal Emergency Management Agency (FEMA) to expand the capacity of Godfrey Brook, a tributary to the Charles River, build resiliency, and restore the brook. Funds from FEMA were matched by the Town, totaling approximately \$1 million. The project area spans from Water Street to West Street.

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:

N/A

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 started drafting a Phosphorus Control Plan in Year 3, which will be further refined in Year 4.

Additionally, the Town began evaluating the implementation of a stormwater user fee, that will be further investigated in Year 4.

As always, the Town will continue its efforts to apply for grants and other sources of funds to be able to complete more stormwater projects going forward.

The Town has hired a consulting company to record a presentation covering the importance of stormwater and the Town's stormwater program to be run on a local TV channel for public education and involvement.

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:

Digitally signed by Scott J. Crisafulli
Date: 2021.09.28 10:49:33 -04'00'

[Signatory may be a duly authorized representative]