

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:

The Town has contracted with its stormwater consultant to update its system mapping and conduct catchment investigations, develop SWPPPs at the Highway Garage and Transfer Station, and develop O&M documents for its facilities in Permit Year 7

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:

The Town plans to focus on public education, outreach, and targeted messaging. The Town plans to add a "Stormwater" section to the Town webpage to post educational materials. Additionally, the Town has goals of working with local public access television to provide information messaging regarding stormwater management. Currently, the Town does not use social media channels to engage the public. The Town does plan to look into developing a social media policy and presence to further engage residents and the local community. Similarly, the Town plans to increase educational BMP messaging through other means, including distributing pet waste management pamphlets with dog license renewal.

Nitrogen (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) that encourages the proper use and disposal of grass clippings and encourages the proper use of slow-release 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)

Structural BMPs

- Installed a structural BMP as a demonstration project within the drainage area of the water quality limited water or its tributaries. The type of BMP installed is (e.g. *biofiltration*):

Any structural BMPs listed in Attachment 3 to Appendix F already existing or installed in the regulated area by the permittee or its agents was tracked and the nitrogen 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 nitrogen removed in mass per year by the BMP were documented.
 - No BMPs were installed
 - The above referenced BMP information is attached to the email submission
 - The above referenced BMP information can be found at the following publicly available website:

Total estimated nitrogen removed in lbs/year from the installed BMPs:

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 has contracted with its stormwater consultant to develop its retrofit plan in FY25, and has received a grant from MA Office of Coastal Zone Management Habitat and Water Quality Grant program to develop a nutrient loading analysis for the entire town, including the MS4 regulated area. The Town's stormwater consultant will be working to prepare both documents, prioritizing areas with higher pollutant loading for future retrofit opportunities.

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)

Structural BMPs

- Installed a structural BMP as a demonstration project within the drainage area of the water quality limited water or its tributaries. The type of BMP installed is (e.g. *biofiltration*):

- 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.

- No BMPs were installed
- The above referenced BMP information is attached to the email submission
- The above referenced BMP information can be found at the following publicly available website:

Total estimated phosphorus removed in **lbs/year** from the installed BMPs:

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 has limited (<1000 ft) roadway within the Ten Mile River watershed which is listed as impaired for phosphorus. Presently, there is no closed drainage system in this small, regulated area of town. The Town plans to complete a nutrient loading analysis for the whole town, including a BMP implementation schedule that looks at loading more broadly in Town. This plan will make recommendations for BMP implementation in areas identified with the highest loading for both Phosphorus and Nitrogen.

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
 - The street sweeping schedule is attached to the email submission
 - The street sweeping schedule can be found at the following publicly available website:

- 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:

The Town targets areas that are subject to higher sediment loading and frequently more than 50% full, described further in MCM6.

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

Town of Rehoboth has contracted with Fuss & O'Neill to provide consulting services for MS4 permit related tasks. These tasks include: updating stormwater system mapping and conducting catchment investigation using desktop and field analysis, completion of a System Vulnerability Factor (SVF) assessment and table for each catchment, drafting a Standard Operating Procedure for town-owned facilities, drafting a Stormwater Pollution Prevention Plan for the Highway Garage and Transfer Station, conducting a regulatory review and propose revisions of the Town's land use regulations and policies related to construction site runoff control and post-construction stormwater regulatory mechanisms, drafting a Nitrogen and Phosphorus Source Identification Report, completion of a retrofit inventory for Town-owned properties using desktop and field analysis resulting in conceptual BMP site plans for five (5) priority sites, and completion of wet weather sampling for all outfalls with a minimum of one (1) SVF identified.

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:

In response to the Administrative Order from EPA and DEP dated April 18, 2023, the Town completed locational mapping of outfalls within the regulated area, locating and identifying 25 structures. Once outfalls were identified and located, the list of receiving waters was updated, reflecting the latest Integrated List of Waters dated 2022.

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: Do Your 'Doody' for Clean Water

Message Description and Distribution Method:

A flyer describing the negative effects of pet waste on water quality and the surrounding environment was distributed with each dog license renewal.

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

Number of flyers distributed, measured as number of dog licenses renewed (1,871 during Year 6). The flyer is also played daily on three public access TV channels.

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: Maintenance of Septic System

Message Description and Distribution Method:

A media post was shared on the Town's website reminding residents of important septic system maintenance tips.

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

Post views are not tracked, but the post can be found at the following URL.

https://www.rehobothma.gov/sites/g/files/vyhlf4911/f/uploads/septic_system_dos_dont.pdf

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:

MCM2: Public Participation

Describe the opportunity provided for public involvement in the development of the Stormwater Management Program (SWMP) **during this reporting period:**

No changes were made to the SWMP during this reporting period, therefore no public involvement was sought or received.

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:**

The Town coordinated with volunteers during the Keep Rehoboth Beautiful Annual Spring Roadside cleanup event. Hosted in April 2024, this event collected 8 1-ton dump trucks worth of trash including 162 bags, 10 tires, 2 kitty litter buckets, and 1 recliner chair that were properly removed and disposed of by Town staff. Additionally, the Town offers services to collect waste oil at the Highway Garage as well as paint and electronics at the Transfer Station.

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:

The Town originally completed mapping of its MS4 system in 2008, but this data is no longer available. The Town has since remapped its outfalls, identifying 25 outfalls in the regulated area. The Town has contracted with its stormwater consultant to map the drainage network, including catch basins, manholes, and pipe connectivity in its urbanized area. This work is anticipated to be complete by December 31, 2024.

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:

All 25 outfalls were inspected in Fall 2023, and included with the Year 5 Annual Report

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:

System mapping and catchment investigations are scheduled to begin in Fall 2024

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:

*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:

One (1) incident of illegal dumping was brought to the Board of Health in a recent permit year which was overseen by the State Strike Force and has since been cleaned up and remedied. DEP conducted testing on the material and determined it was not hazardous.

Employee Training

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

Highway department employees received virtual IDDE training through the Central Massachusetts Regional Stormwater Coalition (CMRSWC) IDDE Training Workshop.

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:

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:

The Town has contracted with its Stormwater Consultant to complete this report in FY25

Green Infrastructure Report

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

The Town has contracted with its Stormwater Consultant to complete this report in FY25

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):

The Town has contracted with its Stormwater Consultant to complete this report in FY25

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 inventoried as part of 2.3.6.d. Right-of-way green infrastructure retrofits were identified under a FY19 MVP Grant.

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:

Material in all catch basins is measured during inspections and recorded. During catch basin cleanings all leaves are collected and composted. The Town prioritizes catch basins in areas Town-wide that receive high sediment loading or any catch basin sumps that are more than 50% full during two consecutive routine cleanings.

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: [Select Units]

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:

No actions needed to be taken. SWPPPs for two facilities are in development during FY25

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):

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 Town currently has limited staff and resources related to its MS4 program, as well as staff turnover. Despite this, the Town is working diligently to bring several overdue requirements into compliance over the coming permit years. The Town is working with their consultant to finalize their IDDE report, which should allow the Town to successfully begin catchment investigations.

Additional Information

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 number of catch basins inspected and cleaned and street miles swept is Town-wide, not just within the Town's regulated area.

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:

The Town conducted a gap analysis to identify its permit needs, resulting from personnel turnover, and intends to address these gaps in the coming permit years, as time and budget allow. Additionally, the Town has already started to identify opportunities to increase education messaging and public outreach by enhancing the Town's webpage, working with local media (e.g. television channels), and engaging directly with residents (e.g., dog license renewals).

The Town will review the results of its MS4 compliance efforts planned for FY25 to identify a path forward for permit year 7 and beyond.

Part V: Certification of Small MS4 Annual Report 2024

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.

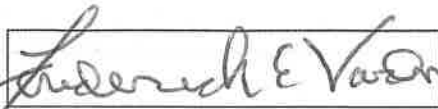
Name:

Frederick E. Vadnais, Jr.

Title:

Chairman

Signature:



Date:

9/23/24

[Signatory may be a duly authorized representative]