

**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: Town of Sterling

EPA NPDES Permit Number: MAR041222

**Primary MS4 Program Manager Contact Information**

Name: Kellie Hebert

Title: Town Administrator

Street Address Line 1: Butterick Municipal Building

Street Address Line 2: 1 Park Street

City: Sterling

State: MA

Zip Code: 01564

Email: khebert@sterling-ma.gov

Phone Number: (978) 422 8111

**Stormwater Management Program (SWMP) Information**

SWMP Location (web address): [https://www.sterling-ma.gov/sites/g/files/vyhlf1266/f/uploads/sterling\\_swmp\\_20200129\\_r1.pdf](https://www.sterling-ma.gov/sites/g/files/vyhlf1266/f/uploads/sterling_swmp_20200129_r1.pdf)

Date SWMP was Last Updated: Jan 29, 2020

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:

Year 3 requirements were delayed due to staff turnover and impacts of COVID-19 on Town staffing. Outfall screening and priority ranking were completed after the deadline (started July 2021 and completed September 2021). Data will be provided with the next annual report. The Town's existing Post-construction ByLaw and associated regulations are in the process of being updated, but due to the delay of Town Meetings this is expected to receive approval during a special Town Meeting Fall 2021 or Spring 2022 Town Meeting.

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 Operations crew was short staffed this past year which put the Town behind on CB cleaning and street sweeping. New staff are coming on board Fall 2021. For this reason, IDDE training was also postponed to Fall 2021.

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



### **Part III: Receiving Waters/Impaired Waters/TMDL**

Have you made any changes to your lists of receiving waters, outfalls, or impairments since the NOI was submitted?

- Yes
- No

If yes, describe below, including any relevant impairments or TMDLs:



### Part IV: Minimum Control Measures

Please fill out all of the metrics below. If applicable, include in the description who completed the task if completed by a third party.

#### MCM1: Public Education

Number of educational messages completed during this reporting period: 0

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:[Message name here]**

Message Description and Distribution Method:

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

Message Date(s):

Message Completed for: Appendix F Requirements  Appendix H Requirements

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

If yes, describe why the change was made:

Add an Educational Message

#### MCM2: Public Participation

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

The SWMP is available on the Town's website.



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

Describe any other public involvement or participation opportunities conducted **during this reporting period:**

### **MCM3: Illicit Discharge Detection and Elimination (IDDE)**

#### **Sanitary Sewer Overflows (SSOs)**

*Check off the box below if the statement is true.*

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

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

Number of SSOs identified: 0

Number of SSOs removed: 0

#### **MS4 System Mapping**

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

All Phase I mapping requirements were completed prior to this reporting period. The map will be updated during Year 4 to reflect findings of dry weather outfall screening.

#### **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: 0



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

Percent of outfalls screened: 0

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

Due to staff turnover, outfall screening was delayed but was completed following the Year 3 deadline. Outfall screening commenced July 2021 and was completed September 2021. Data will be provided with the next 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 website:

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

Number of catchment investigations completed this reporting period: 0

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

Percent of total catchments investigated: 0

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

### **IDDE Progress**

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

- No illicit discharges were found
- The illicit discharge removal report is attached to the email submission
- The illicit discharge removal report can be found at the following 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: 0

Number of illicit discharges removed: 0

Estimated volume of sewage removed: 0 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: 0

Total number of illicit discharges removed: 0

*Optional: Provide any additional information for clarity regarding illicit discharges identified, removed, or planned to be removed below:*

**Employee Training**

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

IDDE training was postponed to Fall 2021 due to shortage of staff and turnover. New staff coming on board Fall 2021.

**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: 2

Number of inspections completed: 10

Number of enforcement actions taken: 0

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

One (1) site under the local Stormwater ByLaw, and one (1) 40B site under the wetlands protection act. Ten (10) inspections completed for the 40B site. No enforcement actions.

**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: 0

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

No as-builts received during this reporting period

**Street Design and Parking Lots Report**

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

The Town has contracted with Stantec to complete this work during FY2022

**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 has contracted with Stantec to complete this work during FY2022

**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 has contracted with Stantec to complete this work during FY2022

**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: 195

Number of catch basins cleaned: 195

Total volume or mass of material removed from all catch basins: 0

[Select Units]



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

Total number of catch basins: 1,687

*If applicable:*

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

1,687 catch basins town-wide, however only ~460 catch basins are located within the urbanized MS4 area.

**Street Sweeping**

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

- Number of miles cleaned: 51
- 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: 0

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:

### **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:

Staff reductions/turnover impacted several tasks including outfall screening, post-construction regulations, IDDE training, catch basin cleaning, street sweeping, and SWPPP inspections.

### **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 has already completed Dry Weather Outfall Screening (July-Sept 2021) and is in the process of updating the local Stormwater ByLaws and Regulations to comply with post-construction requirements, which the Town expects to get approved during a special Town Meeting Fall 2021 or Spring 2022 Town Meeting. These activities are to catch up on Year 3 requirements that were delayed due to a staffing shortage related to COVID-19 and retirements.



## 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]*

