

# **Stormwater Management Program (SWMP) Plan**

**Town of Sutton, Massachusetts**

**Prepared June 30, 2019  
Revised August 31, 2021**

## **Prepared For:**

**Town of Sutton**  
4 Uxbridge Road,  
Sutton, MA 01590



## **Prepared By:**

**Comprehensive Environmental Inc.**  
41 Main Street  
Bolton, MA 01740



**Stormwater Management Program (SWMP) Plan Revision Log**

<b>Revision Date</b>	<b>Section(s) Revised</b>	<b>Revisions Made</b>	<b>Revisions Made by</b>
June 30, 2019	All	Original SWMP Plan prepared.	Nick Cristofori, CEI
August 31, 2021	All	SWMP Plan amended to document work completed during Permit Year 2 and Permit Year 3.	Nick Cristofori, CEI

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### Stormwater Management Program (SWMP) Plan 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 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: \_\_\_\_\_

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# 1 Introduction

Sutton is one of many Massachusetts communities regulated under the Environmental Protection Agency's (USEPA) National Pollutant Discharge Elimination System (NPDES) Phase II rule (40 CFR 122). The rule requires regulated operators of municipal separate storm sewer systems (MS4) to develop a Stormwater Management Program (SWMP) and Best Management Practices (BMPs) to reduce the impacts of stormwater discharges. The requirements are outlined in the NPDES General Permits for Stormwater Discharges from Small Municipal Separate Storm Sewer Systems in Massachusetts, which was signed on April 4, 2016, with an effective date of July 1, 2018, hereinafter referred to as the 2016 MS4 Permit.

This SWMP Plan describes and details the activities and measures that is being implemented to meet the terms and conditions of the permit.

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## 1.1 Regulatory Background

The Stormwater Phase II Final Rule was promulgated in 1999 and was the next step after the 1987 Phase I Rule in the United States Environmental Protection Agency's effort to preserve, protect, and improve the Nation's water resources from polluted stormwater runoff. The Phase II program expands the Phase I program by requiring operators of Small Municipal Separate Storm Sewer Systems in urbanized areas, through the use of National Pollutant Discharge Elimination System permits, to implement programs and practices to control polluted stormwater runoff. Phase II is intended to further reduce adverse impacts to water quality and aquatic habitat by instituting the use of controls on the unregulated sources of stormwater discharges that have the greatest likelihood of causing continued environmental degradation. Under the Phase II rule all MS4s with stormwater discharges from Census designated Urbanized Area are required to seek NPDES permit coverage for those stormwater discharges.

On May 1, 2003, EPA Region 1 issued its Final General Permit for Stormwater Discharges from Small Municipal Separate Storm Sewer Systems (2003 MS4 Permit) consistent with the Phase II rule. The 2003 MS4 Permit covered "traditional" (i.e., cities and towns) and "non-traditional" (i.e., certain Federal and state agencies and/or facilities) MS4 Operators located in the states of Massachusetts and New Hampshire. This permit expired on May 1, 2008 but remained in effect until operators were authorized under the USEPA's 2016 NPDES General Permit for Stormwater Discharges from MS4 in Massachusetts, hereafter referred to as the "2016 Massachusetts MS4 Permit", "2016 Permit", "MS4 Permit, and/or "2016 MS4 Permit" which replaces the 2003 MS4 Permit.

The 2016 Massachusetts MS4 Permit was signed on April 4, 2016 with an original effective date of July 1, 2017, however was postponed by 1 year to a new effective date of July 1, 2018. The permit was cosigned by the Massachusetts Department of Environmental Protection (MassDEP) and thus is jointly regulated by EPA and MassDEP for Massachusetts permittees. After several years of litigation, the permit was updated in December 2020 with a revised effective date of January 6, 2021. Authorization to discharge expires at June 30,

2022. The following sections outline how the Town of Sutton is meeting Phase II regulatory and schedule requirements.

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## 1.2 MS4 Program

As required by the 2016 MS4 Permit, The Town of Sutton submitted a Notice of Intent (NOI) and required accompanying information, including endangered species, historic preservation, and an outfall map to EPA Region 1 by the September 28, 2018 deadline (**Appendix A**) requesting authorization to discharge under the new permit. Sutton received official authorization to discharge stormwater from its MS4 on February 14, 2019. Authorization to discharge expires at June 30, 2022.

This Stormwater Management Program Plan has been developed by the Town of Sutton to address the requirements of the 2016 MS4 Permit as a follow-up to the NOI. This SWMP Plan documents the Town of Sutton's program, including Best Management Practices, plans, activities, and measures that have been implemented to date, those that are ongoing, and those proposed for the future to comply with the 2016 MA MS4 Permit. This is a "living" document and should be updated and/or modified as required during the permit term as the permittee's activities are modified, changed or updated to meet permit conditions during the permit term.

This permit in part requires that each permittee, or regulated community, address 6 Minimum Control Measures (MCMs). These measures include the following:

1. Public Education and Outreach;
2. Public Involvement and Participation;
3. Illicit Discharge Detection and Elimination Program;
4. Construction Site Stormwater Runoff Control;
5. Stormwater Management in New Development and Redevelopment (Post Construction Stormwater Management); and
6. Good Housekeeping and Pollution Prevention for Permittee Owned Operations.

In addition to the 6 MCMs above, permittees must also address water quality impacts from waterbodies with approved Total Maximum Daily Loads (TMDLs) and certain impairments, generally known as water quality limited waterbodies.

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## 1.3 Regulated Area

Requirements of the 2016 MS4 Permit are limited to a regulated area, defined as the Town's Urbanized Areas (UAs) which generally constitute the largest and most dense areas of settlement in a region. The Bureau of the Census determines UAs by applying a detailed set of published UA criteria to the latest decennial census data. Although the full UA definition is complex, the Bureau of the Census' general definition of a UA, based on population and population density, is provided below:

*"An urbanized area (UA) is a densely settled core of census tracts and/or census blocks that have population of at least 50,000, along with adjacent territory*

*containing non-residential urban land uses as well as territory with low population density included to link outlying densely settled territory with the densely settled core. It is a calculation used by the Bureau of the Census to determine the geographic boundaries of the most heavily developed and dense urban areas.”*

The most recent UA maps are based on the 2010 Census. **Figure 1-1** shows the UA in the Town of Sutton, most of which lies in the northeastern portion of the Town and generally excludes the more rural central and western portions, which include the heavily forested Purgatory Chasm State Reservation. Small pockets of UA also exist near the northern and southern borders of the Town. Per the most recent census data, Sutton’s UA covers 5,764 people out of a total 8,965, or approximately 64% of the population. The UA area has increased significantly since the 2000 Census, generally expanding into the northeastern and southern portions of the Town. Although some of the UA mapped in the 2000 Census located in central Sutton has receded, it should be noted that EPA defines the regulated UA as applying to any area of the community identified by an official Census, regardless of the year. Thus, areas that are identified as non-urbanized under the 2010 Census but urbanized under the 2000 Census are still regulated areas. In short, the regulated UA cannot shrink and can only expand. The UA is subject to change every 10 years based on the application of the Census definition, thus a larger area may be covered in the future.

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## 1.4 How to Use this Plan

For the purposes of the 2016 MS4 Permit and ease of use, the Town’s SWMP encompasses 6 separate written documents:

1. SWMP Plan (this document);
2. Illicit Discharge Detection and Elimination (IDDE) Plan (standalone document);
3. Operation and Maintenance (O&M) Plan (standalone document);
4. Stormwater Pollution Prevention Plan (SWPPP) (standalone document);
5. Nitrogen Source Identification Report (standalone document); and
6. Phosphorus Source Identification Report (standalone document).

This SWMP Plan is divided into several sections and includes the following components:

- |                  |   |
|------------------|---|
| <b>Section 2</b> | <b>Town Characteristics</b> – Section 2 provides an overview of relevant characteristics, focusing on those aspects related to stormwater runoff and the water quality of surface waters.                                 |
| <b>Section 3</b> | <b>MCM 1: Public Education and Outreach</b> – regulated operators of MS4s are required to implement a public education program. Section 3 discusses activities to comply with this measure.                               |
| <b>Section 4</b> | <b>MCM 2: Public Participation and Involvement</b> – regulated MS4s are required to obtain public participation throughout the stormwater management program. Section 4 discusses activities to comply with this measure. |

- Section 5**      **MCM 3: Illicit Discharge, Detection, and Elimination** – regulated MS4s must develop and implement an illicit discharge detection and elimination program and develop a regulation to prohibit illicit discharges. Section 5 discusses activities to comply with this measure.
- Section 6**      **MCM 4: Construction Site Stormwater Runoff Control** – regulated MS4s are required to implement and enforce a program to reduce pollutants in stormwater runoff from construction activities that disturb 1 or more acres. This requires the development of a local regulation requiring implementation of proper erosion and sediment controls. Permittees are also responsible for inspections and enforcement. Section 6 discusses activities to comply with this measure.
- Section 7**      **MCM 5: Stormwater Management in New Development and Redevelopment** – regulated MS4s are required to develop and enforce a regulation requiring implementation of post-construction runoff controls at sites where construction activities disturb 1 or more acres. The controls must be designed to treat stormwater runoff from post-development sites and must be maintained over the long-term. Section 7 discusses activities to comply with this measure.
- Section 8**      **MCM 6: Good Housekeeping and Pollution Prevention** – regulated MS4s must review their operations at specific facilities and those that occur throughout the Town (i.e., catch basin cleaning and street sweeping) and make improvements where needed to minimize pollution to stormwater runoff. Staff involved in these operations must also be trained on appropriate operations and maintenance techniques. Section 8 discusses activities to comply with this measure.
- Section 9**      **TMDL and Impaired Waters Controls** – regulated MS4s are required to evaluate and address stormwater contributions to impaired waters. Section 9 discusses activities to comply with this measure.
- Section 10**     **Annual Reporting** – Section 10 provides a summary of annual reporting requirements in order to meet the 2016 MS4 Permit.
- Section 11**     **Implementation of Best Management Practices** – Section 11 provides a summary of BMPs outlined in Sections 3 through 9 for easy reference.

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## 1.5 Program Responsibilities

This plan is intended to be used by Town of Sutton staff whose job involves administering the MS4 permit and associated requirements. The Town's MS4 program is headed by the following personnel:



**Table 1-1. MS4 Responsible Personnel**

Name	Title, Department	Contact
Mr. Matthew Stencel	Highway Superintendent	(508) 865-8743, <a href="mailto:mstencel@town.sutton.ma.us">mstencel@town.sutton.ma.us</a>

The Town of Sutton has 9 departments responsible for implementing portions of its MS4 program as identified in the NOI. Therefore, due to the extensive number of departments involved as part of the Town's MS4 program, it is not feasible to list names and titles of responsible personnel for each one, as the information within this plan would be frequently out of date. However, **Table 1-2** provides a list of responsible departments and their general responsibilities. The responsible person is the most senior person (e.g. department head, administrator, senior elected official, etc.) within each department listed below.

**Table 1-2. Program Responsibilities**

Department / Division	General Responsibilities
Board of Health	Sanitary Sewer Overflow (SSO) inventory; IDDE program implementation; IDDE training; bylaw and regulation development;
Building / Zoning Department	Information distribution for public education; bylaw and regulation development; site plan review procedures; site inspections and procedures; as-built submittal; target properties to reduce impervious areas and for BMP retrofit
Conservation Commission	Information distribution for public education; public participation; bylaw and regulation development; site plan review procedures; site inspections and procedures; as-built submittal; target properties to reduce impervious areas and for BMP retrofit; TMDL and water quality limited requirements
Highway Department	Information distribution for public education; website development and management; public participation; SSO inventory; system mapping; IDDE program creation and implementation; IDDE training; bylaw and regulation development; target properties to reduce impervious areas and for BMP retrofit; inventory buildings and facilities; develop operation and maintenance procedures; SWPPP development and implementation; catch basin cleaning and street sweeping; road salt optimization program; BMP inspections and maintenance; good housekeeping training; TMDL and water quality limited requirements
Information Technology	Social media participation; website development and management; public participation
Planning Board	Information distribution for public education; bylaw and regulation development; site plan review procedures; site inspections and procedures; as-built submittal; target properties to reduce impervious areas and for BMP retrofit; TMDL and water quality limited requirements
Recreation Department	Inventory buildings and facilities; develop operation and maintenance procedures
Town Clerk	Information distribution for public education
Zoning Board	Information distribution for public education, bylaw and regulation development; site plan review procedures; site inspections and procedures



## 2 Town Characteristics

This section provides some background information on the Town of Sutton, Massachusetts, useful in understanding the Town's characteristics and resources to develop a tailored Stormwater Management Plan. Town characteristics are described below.

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### 2.1 Community Information

Sutton is located in south-central Massachusetts within Worcester County, approximately 39 miles southwest of Boston and just under 5 miles east of I-395. It is generally bordered by Millbury, Massachusetts to the north, Grafton to the northeast, Northbridge to the east, Uxbridge to the southeast, Douglas to the south, and Oxford to the west. The Town area is located within the Long Island Sound watershed, and a portion of the regulated area also lies within the Blackstone River watershed. Select relevant community profile information is provided below:

- Total Area = 33.9 square miles (*source: Wikipedia*)
- 2010 Population = 8,965 (*source: EPA maps based on 2010 US Census*)
- Regulated Area Population = 5,764 (*source: EPA maps based on 2010 US Census*)

---

### 2.2 Demographics

Demographics play a role in developing a public education program that targets the appropriate audience through the most appropriate means. Information on owner occupancy versus rentals and languages spoken can help shape how information is disseminated. In Sutton, 99.6% of residents speak English only or speak English “very well,” and the majority of homes are owner-occupied (*Source: factfinder.census.gov*). Thus, the Town of Sutton disseminates public education and outreach program materials in English and to homes with reasonable certainty that the target populations are reached.

---

### 2.3 Land Use

The land uses within the regulated area of the Town of Sutton are shown on **Figure 2-1** and provided below. Impervious area is shown on **Figure 2-2**.

- |                                |     |
|--------------------------------|-----|
| • Commercial and Urban         | 2%  |
| • Forest                       | 48% |
| • Open Land and Agriculture    | 10% |
| • Industrial                   | 4%  |
| • Residential                  | 24% |
| • Transportation and Utilities | 4%  |
| • Wetlands                     | 6%  |
| • Water                        | 2%  |

As per the above, Sutton has substantial forest, open land, and water/wetland area (approximately 66%), with much of the remaining consisting of low-density residential

development (approximately 24%). Remaining land use (approximately 10%) consists largely of roadways and minor commercial/industrial development.

## 2.4 303(d) Impaired Waterbodies

The ultimate goal of this Stormwater Management Plan is to outline a program to effectively maintain the Town's stormwater infrastructure and to improve the water quality of receiving waters (waters which receive stormwater discharges from the MS4) in compliance with the 2016 MS4 Permit. 303(d) impaired waters are those surface waters identified by the MassDEP as priority waters that do not meet water quality criteria. As part of the 2016 MS4 Permit, communities must implement BMPs to address all 303(d) waters and specifically address those that have a completed TMDL study. **Table 2-1** lists the "impaired waters" partially or wholly located within the boundaries of Sutton's regulated area based on the Final 2016 Massachusetts Integrated List of Waters produced by MassDEP every 2 years<sup>1</sup>. These waters are shown in **Figure 2-3**. Sutton will review changes as new lists are published and update this plan as required.

**Table 2-1. Impaired Waters**

Waterbody Name	Segment ID and Category		Impairment(s)	Approved TMDL <sup>2</sup>
Hudson Pond	MA42029	4a	Aquatic Plants (Macrophytes)	2363 <sup>3</sup>
			Nutrient/Eutrophication Biological Indicators	
Girard Pond	MA51053	4c	(Non-native aquatic plants*)	
Sibley Reservoir	MA51148	4c	(Low-flow alterations*)	
Singletary Pond	MA51152	4c	(Eurasian Water Milfoil, <i>Myriophyllum spicatum</i> *)	
			(Non-Native Aquatic Plants*)	
Stevens Pond	MA51159	4c	(Non-Native Aquatic Plants*)	
Swans Pond	MA51164	4c	(Non-Native Aquatic Plants*)	
Tuckers Pond	MA51169	4c	(Non-Native Aquatic Plants*)	
Whitins Pond	MA51180	4c	(Non-Native Aquatic Plants*)	
Aldrich Pond	MA51002	5	(Non-Native Aquatic Plants*)	
			Aquatic Plants (Macrophytes)	
Cook Allen Brook	MA51-28	5	Fishes Bioassessments	
Marble Pond	MA51093	5	(Non-Native Aquatic Plants*)	
			Aquatic Plants (Macrophytes)	

<sup>1</sup>Note that at the time of preparation of this report (August 2021), the 2016 303d list is the most up to date finalized 303d List as approved by USEPA on December 2019.

<sup>2</sup>"Approved TMDLs" are those that have been approved by EPA as of the date of issuance of the 2016 MS4 Permit.

<sup>3</sup>Sutton is subject to the *TMDL of Phosphorus for Selected French Basin Lakes, May 28 2002*.

**Table 2-1 (continued). Impaired Waters**

Waterbody Name	Segment ID and Category		Impairment(s)	Approved TMDL
Mumford River	MA51-14	5	(Low-flow alterations*)	
			(Non-Native Aquatic Plants*)	
			Aquatic Plants (Macrophytes)	
			Copper	
			Lead	
Blackstone River	MA51-03	5	(Debris/Floatables/Trash*)	
			(Other flow regime alterations*)	
			(Physical substrate habitat alterations*)	
			Ambient Bioassays – Chronic Aquatic Toxicity	
			Aquatic Macroinvertebrate Bioassessments	
			Escherichia coli	
			Excess Algal Growth	
			Fishes Bioassessments	
			Foam/Flocs/Scum/Oil Slicks	
			Lead	
			Nutrient/Eutrophication Biological Indicators	
			Other	
			Oxygen, Dissolved	
			Phosphorus (Total)	
			Sedimentation/Siltation	
Number 1 Pond	MA51114	5	Taste and Odor	
			Turbidity	
Sutton Falls	MA51163	5	Aquatic Plants (Macrophytes)	
			Turbidity	
Welsh Pond	MA51176	5	Harmful Algal Blooms	
			Turbidity	
Woodbury Pond	MA51185	5	(Non-Native Aquatic Plants*)	
			Aquatic Plants (Macrophytes)	

Category 4a Waters – impaired waters with a completed TMDL.

Category 4c Waters – impaired waters where the impairment is not caused by a pollutant. No TMDL required.

Category 5 Waters – impaired waters that require a TMDL.

\*TMDL not required (Non-pollutant)

Sutton is also subject to the Long Island Sound nitrogen TMDL. Thus, Sutton will meet the requirements of this waterbody and remaining requirements for TMDL or water quality limited waterbodies related to phosphorus and bacteria as outlined further in Section 9.

Note that although Sutton has a waterbody listed as impaired for mercury in fish tissue, the 2016 MS4 Permit does not specify a wasteload allocation or other requirements for MS4 discharges. Thus, there are no requirements related to mercury reduction. Other pollutants identified above and not otherwise addressed in this section or Section 9.0 do not have any specific requirements under the 2016 MS4 Permit.

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## 2.5 Measures to Protect Surface Drinking Water Supplies

There are no surface water supplies or tributaries to surface water supplies within the Town. The town does not currently plan on using any surface waterbodies for public drinking water supplies in the near future and implementation of the SWMP helps protect water quality in all receiving waterbodies.

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## 2.6 Endangered Species Act Determination

In order to be eligible to discharge stormwater under the 2016 MS4 Permit, the Town of Sutton must certify that its stormwater system is not impacting federally listed rare or endangered species habitat or other critical environmental locations. This was completed in the summer of 2018 as meeting “Criterion C” on the Notice of Intent with the results documented in **Appendix A**. The Northern Long-eared Bat (*Myotis septentrionalis*) was the only species identified as potentially being present within Sutton’s regulated area. No critical habitats were identified.

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## 2.7 National Historic Preservation Act Determination

Regulated MS4s must also evaluate whether its discharges have the potential to affect historic properties. The MS4 Permit typically authorizes discharges from existing facilities and requires control of the pollutants discharged from the facility, however, EPA does not anticipate effects on historic properties from the pollutants in the authorized discharges. Thus, to the extent EPA’s issuance of the MS4 General Permit authorizes discharges of such constituents, confined to existing channels, outfalls or natural drainage areas, the permitting action does not have the potential to cause effects on historical properties. If there have been no relevant changes in operation of the MS4 since the 2003 MS4 General Permit, the discharge can still be considered to have no potential to have an effect on historic properties. This has been documented as “Criterion A” on the Notice of Intent (**Appendix A**) and thus no additional information is required for documentation.

Where there is disturbance of land through the construction and/or installation of control measures, there is a possibility that artifacts, records, or remains associated with historic properties could be impacted. In these cases, such as during future construction of structural stormwater BMPs, the Town will need to ensure that historic properties will not be impacted by their activities, or that they are in compliance with a written agreement with the State

Historic Preservation Officer (SHPO), Tribal Historic Preservation Officer (THPO), or other tribal representative that outlines all measures the applicant will carry out to mitigate or prevent any adverse effects on historic properties. This will be completed as required during a later date(s).

## 3 MCM 1: Public Education and Outreach

### 3.1 Summary of Permit Requirements

#### 3.1.1 Core Permit Requirements

Under MCM 1, permittees must develop an educational program, define educational goals, express specific messages, define the targeted audience for each message, and identify responsible parties for program implementation. At a minimum, the program must provide information concerning the impact of stormwater discharges on water bodies within the community, especially those waters that are impaired or identified as priority waters. The program must identify steps and/or activities that the public can take to reduce the pollutants in stormwater runoff and their impacts to the environment.

The Town must address 4 core target audiences, unless 1 of these audiences is not present in the MS4 community:

1. Residents;
2. Businesses, Institutions, and Commercial facilities;
3. Developers and Construction; and
4. Industrial facilities.

At least 2 educational messages must be distributed to audiences over the permit term spaced at least a year apart. See sections below for more information.

#### 3.1.2 TMDL & Impaired Waters Requirements

Public education and outreach programs must also address impaired waterbodies or those identified as priority waters and can be found in **Table 3-1**.

**Table 3-1. Priority Waterbodies**

Waterbody Name	Impairment
Long Island Sound	Nitrogen
Blackstone River	Phosphorus
	E.coli
	Metals (lead)
	Sedimentation/siltation
	Turbidity
Mumford River	Metals (copper, lead)
Number 1 Pond	Turbidity
Sutton Falls	Turbidity

Relevant public information on nitrogen, phosphorus, and bacteria topics as outlined by the 2016 MS4 Permit is included with each of the 4 applicable target audiences as outlined

below. Note that although the Blackstone River, Mumford River, Number 1 Pond, and Sutton Falls are listed as impaired for metals and solids, there are no mandated supplementary public education and outreach topics.

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## 3.2 Objectives and Goals

The Town of Sutton implements an education program that includes educational goals based on stormwater issues of significance within the MS4 area, increase knowledge, and change behavior of the public so that pollutants in stormwater are reduced.

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## 3.3 Public Education Program

The following sections outline how Sutton is meeting the requirements of the 2016 MS4 Permit by completing targeted outreach to the 4 required audiences. Additionally, since the Town has waterbodies with TMDL and water quality impairments associated with nitrogen, phosphorus, and bacteria, the program includes messages to help minimize contributions of these pollutants, in accordance with the “Enhanced BMPs” requirements in Appendix F and Appendix H of the 2016 MS4 Permit.

### 3.3.1 Residential

#### **Informational Topics**

As required for all communities under the 2016 MS4 Permit, the following topics are addressed under the Residential public education and outreach program:

- Effects of outdoor activities such as lawn care (use of pesticides, herbicides, and fertilizers) on water quality;
- Benefits of appropriate on-site infiltration of stormwater;
- Effects of automotive work and car washing on water quality;
- Proper disposal of swimming pool water;
- Proper management of pet waste; and
- Maintenance of septic systems.

As required for waterbodies subject to the Long Island Sound nitrogen TMDL and water quality limited waterbodies where phosphorus is the cause of impairment, the Town supplements its Residential program with the following annual messages encouraging:

- Spring (April-May): proper disposal of grass clippings and fertilizer usage, such as slow-release and phosphorus-free;
- Summer (June-July): proper management of pet waste; and
- Fall (August-October): proper disposal of leaf litter.

Due to the similarities in public education requirements for nitrogen TMDL and phosphorus water quality limited waterbodies, requirements for both Long Island Sound and the Blackstone River have been combined. For more information, see Section 9.

As required for waterbodies with bacteria and pathogen TMDLs, the Town supplements its Residential program with the following:

- An annual message encouraging the proper management of pet waste;
- Disseminate educational materials to dog owners at the time of issuance or renewal of a dog licenses;
- Describe detrimental impacts of improper management of pet waste, requirements for waste collection and disposal, and penalties for non-compliance; and
- Provide information to owners of septic systems about proper maintenance in any catchment that discharges to a water body impaired for bacteria or pathogens.

### **Educational Message and Methods of Distribution**

The following table shows the educational messages and methods of distribution for the above topics, along with responsible parties and measurable goals.

**Table 3-2. BMP Description – Residential Outreach**

<b>BMP Description</b>	<b>Message</b>	<b>Method of Distribution</b>	<b>Responsible Parties</b>	<b>Measurable Goal</b>
<b>BMP 1-1: Residential Education Program</b>	Pet waste fact sheets	Provide with dog registrations and renewals	Town Clerk	Provide information with all applications and renewals
	Stormwater flyers and brochures	Distribute flyers with pet registrations and renewals, for download via the Town webpage, and at public buildings	Highway Department	Distribute flyers and brochures continually via each method of distribution
	Stormwater webpage	Provide relevant information and links for viewing and/or download from Town webpage	Information Technology, Highway Department	Continue to update and maintain the websites
	Social Media	Provide relevant stormwater information to different audiences via social media.	Information Technology	Follow statewide “Think Blue” campaign on social media platforms

The following table lists which of the topics are covered under each message.



**Table 3-3. Residential Public Outreach Topics and Message**

	Pet Waste Fact Sheet	Brochures	Social Media	Stormwater Webpage
<b>Topics and Educational Message</b>				
<b>Core Program Topics</b>				
Effects of outdoor activities such as lawn care (use of pesticides, herbicides, and fertilizers) on water quality		X	X	X
Benefits of appropriate on-site infiltration of stormwater		X	X	X
Effects of automotive work and car washing on water quality		X	X	X
Proper disposal of swimming pool water;		X	X	X
Proper management of pet waste	X	X	X	X
Maintenance of septic systems		X	X	X
<b>Nitrogen and Phosphorus Impairment Topics</b>				
Spring (March/April): encourage proper use and disposal of grass clippings and encourage the proper use of slow-release and phosphorus-free fertilizers		X	X	X
Summer (June/July): encourage proper management of pet waste, including noting any existing bylaws where appropriate		X	X	X
Fall (August/September/October): encourage the proper disposal of leaf litter		X	X	X
<b>Bacteria TMDL Topics</b>				
An annual message encouraging proper management of pet waste, including noting existing bylaws where appropriate	X	X	X	X
Disseminate educational materials to dog owners at the time of issuance or renewal of a dog license, or other appropriate time	X	X	X	X
Describe detrimental impacts of improper pet waste management, requirements for waste collection and disposal, and penalties for non-compliance	X	X	X	X
Provide information to owners of septic systems about proper maintenance in any catchment that discharges to a water body impaired for bacteria or pathogens		X	X	X

**Schedule**

Due to the importance of educating Town residents, many of the above topics are made available continuously via brochures and the website. Information pertaining to the nitrogen, phosphorus, and bacteria seasonal messages is made available on the website continuously with notes provided for the appropriate timeframes for implementing certain topics.

### 3.3.2 Businesses, Institutions, and Commercial Facilities

#### Informational Topics

As required for all communities under the 2016 MS4 Permit, the following topics are addressed under the Business, Institutions, and Commercial public education program:

- Proper lawn maintenance (use of pesticides, herbicides and fertilizer);
- Benefits of appropriate on-site infiltration of stormwater;
- Building maintenance and storage of materials;
- Proper use and storage of salt or other de-icing and anti-icing materials;
- Proper management of waste materials and dumpsters;
- Proper management of parking lot surfaces;
- Proper car care activities; and
- Proper disposal of swimming pool water by entities such as hotels, health and country clubs.

Due to the similarities in public education requirements for nitrogen TMDL and phosphorus water quality limited waterbodies, requirements for both Long Island Sound and the Blackstone River have been combined. For more information, see Section 9. The Town supplements its Business, Institutions, and Commercial program with the following annual messages encouraging:

- Spring (April-May): proper disposal of grass clippings and fertilizer usage, such as slow-release and phosphorus-free;
- Summer (June-July): proper management of pet waste; and
- Fall (August-October): proper disposal of leaf litter.

#### Educational Message and Methods of Distribution

The following table shows the educational messages and methods of distribution for the above topics, along with responsible parties and measurable goals. All informational topics are addressed on the Town's website.

**Table 3-4. BMP Description – Businesses, Institutions, and Commercial Outreach**

<b>BMP Description</b>	<b>Message</b>	<b>Method of Distribution</b>	<b>Responsible Parties</b>	<b>Measurable Goal</b>
<u>BMP 1-2:</u> Businesses, Institutions, and Commercial Education Program	Stormwater webpage	Provide relevant information and links for viewing and/or download from Town webpage	Information Technology, Highway Department	Continue to update and maintain the websites
	Social Media	Provide relevant information to different audiences via various social media platforms	Information Technology	Follow statewide "Think Blue" campaign on social media platforms

### Schedule

Information pertaining to the Business, Institutions, and Commercial public education and outreach program is be made available continuously on the website and via social media. Because of the TMDL and water quality limited waterbody requirements, pet waste fact sheets also targets the Business, Institutions, and Commercial audience.

### 3.3.3 Developers and Construction

#### Informational Topics

As required for all communities under the 2016 MS4 Permit, the following topics are addressed under the Developers and Construction public education and outreach program:

- Proper sediment and erosion control management practices;
- Information about Low Impact Development (LID) principles and technologies; and
- Information about EPA’s construction general permit (CGP).

#### Educational Message and Methods of Distribution

The following table shows the educational messages and methods of distribution for the above topics, along with responsible parties and measurable goals. All informational topics are addressed on the Town’s website and via erosion control and fact sheets provided to developers when applying for applicable permits.

**Table 3-5. BMP Description – Developers and Construction Outreach**

<b>BMP Description</b>	<b>Message</b>	<b>Method of Distribution</b>	<b>Responsible Parties</b>	<b>Measurable Goal</b>
<u>BMP 1-3:</u> Developers and Construction Education Program	Brochures / handouts	Distribute fact sheets or brochures on erosion and sediment control with permit applications.	Planning Board, Conservation Commission, Building / Zoning Department, Zoning Board	Provide information with all applications.
	Social Media	Provide relevant information to different audiences via various social media platforms	Information Technology	Follow statewide “Think Blue” campaign on social media platforms
	Stormwater webpage	Provide relevant information and links for viewing and/or download from Town webpage	Information Technology, Highway Department	Continue to update and maintain the websites

### Schedule

Information pertaining to the Developers and Construction is made available continuously on the website and via social media.

### 3.3.4 Industrial

#### Informational Topics

As required for all communities under the 2016 MS4 Permit, the following topics are addressed under the Industrial public education and outreach program:

- Equipment inspection and maintenance;
- Proper storage of industrial materials and dumpster management;
- Proper management and disposal of wastes;
- Minimization of use and proper storage of salt or other de-icing/anti-icing materials;
- Benefits of on-site stormwater from areas with low exposure to industrial materials;
- Proper maintenance of parking lot surfaces; and
- Information about EPA's CGP.

#### Educational Message and Methods of Distribution

The following table shows the educational messages and methods of distribution for the above topics, along with responsible parties and measurable goals. All informational topics are addressed on the Town's website.

**Table 3-6. BMP Description – Industrial Outreach**

<b>BMP Description</b>	<b>Message</b>	<b>Method of Distribution</b>	<b>Responsible Parties</b>	<b>Measurable Goal</b>
<u>BMP 1-4:</u> Industrial Education Program	Stormwater webpage	Provide relevant information and links for viewing and/or download from Town webpage	Information Technology, Highway Department	Continue to update and maintain the websites
	Social Media	Provide relevant information to different audiences via various social media platforms	Information Technology	Follow statewide "Think Blue" campaign on social media platforms

#### Schedule

Information pertaining to the Industrial public education and outreach program is made available on the website continuously on the website and via social media.

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## 3.4 Measuring Public Education Program Effectiveness

During completion of the Town's annual report as detailed further under **Section 10**, Sutton will review the effectiveness of each message and the Town's overall education program. Effectiveness is expected to vary by message, however will generally be measured based on quantities of materials distributed and feedback from town employees based on observations in their area of work. Educational messages and/or distribution techniques will be modified as needed, should program managers determine that they are ineffective.

## 4 MCM 2: Public Participation & Involvement

### 4.1 Summary of Permit Requirements

Under MCM 2, permittees must provide annual opportunities for public participation in the review and implementation of the Town's SWMP as part of a public education and involvement program. All public involvement activities must comply with state public notice requirements. The SWMP and annual reports must also be made available so that the public has opportunities to review and comment.

### 4.2 Objectives and Goals

Sutton implements a public participation and involvement program that provides opportunities for review and implementation of the Town's SWMP. This helps support public education and outreach items under MCM 1.

### 4.3 Public Participation and Involvement Opportunities

The following outlines how Sutton is meeting permit requirements to provide the public with opportunities to participate in reviewing and implementing the SWMP.

#### 4.3.1 Make Documents Publicly Available for Comment

Sutton makes this written SWMP Plan and annual reports available for review and comment via the Town's website, along with the name, email address and/or phone number of a contact person from the Town government to request additional information or submit comments. This allows the public to comment on the program at least once per year. An updated SWMP Plan is posted to the website annually as additional tasks are completed. The following table shows the BMP, responsible parties and measurable goals.

**Table 4-1. BMP Description – Make Documents Publicly Available for Comment**

<b>BMP Description</b>	<b>Responsible Parties</b>	<b>Measurable Goal</b>
<u>BMP 2-1</u> : Make SWMP Plan Publicly Available	Information Technology, Highway Department	Annual review of stormwater management plan and posting on website. Allow public to comment on the plan at least annually

#### 4.3.2 Watershed Cleanup Events

The Town continues to sponsor at least 1 cleanup event per year, focusing on Town ponds, lakes and streams. Event organization, announcements, and materials are provided by the responsible departments.

**Table 4-2. BMP Description – Shoreline and Waterbody Cleanups**

<b>BMP Description</b>	<b>Responsible Parties</b>	<b>Measurable Goal</b>
<u>BMP 2-2:</u> Shoreline and Waterbody Cleanups	Highway Department, Conservation Commission	Allow annual participation in stream and pond cleanup events

## 5 MCM 3: Illicit Discharge, Detection, and Elimination

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### 5.1 Summary of Permit Requirements

Under MCM 3, permittees must implement an IDDE program to systematically find and eliminate sources of non-stormwater discharges to its MS4 and implement procedures to prevent such discharges. A summary of the required IDDE activities and timelines are provided below. See sections below for more information.

#### 5.1.1 Legal Authority

The IDDE program shall include adequate legal authority in the form of a currently effective ordinance, bylaw, or other regulatory mechanism to prohibit, investigate, and eliminate illicit discharges. For permittees authorized by the MS4-2003 permit such as Sutton, the ordinance, bylaw, or other regulatory mechanism was required to be effective by May 1, 2008.

#### 5.1.2 Sanitary Sewer Overflow

Regulated communities must identify all known locations where sanitary sewer overflows (SSOs) have discharged to the MS4 during the previous 5-years and update it annually. Upon detection of an SSO, the permittee must eliminate it as quickly as possible and take interim mitigation measures to minimize or eliminate the discharge of pollutants until remediation work is complete.

#### 5.1.3 System Mapping

Regulated communities must complete a comprehensive map of their stormwater system in 2 phases. Phase 1 must be completed within 2 years and include infrastructure such as outfalls and preliminary catchment delineations, waterbodies, open channel conveyances, interconnections with other MS4s, and structural stormwater BMPs. Phase 2 must be completed within 10 years and include information such as outfalls with high accuracy GPS location and refined catchment delineations, catch basins, manholes, pipe connectivity, and sanitary or combined sewer systems as available/applicable.

#### 5.1.4 Illicit Discharge, Detection, and Elimination Program

The 2016 MS4 Permit requires preparation of a comprehensive written IDDE Program or IDDE Plan that provides detailed procedures for assessment and priority ranking of outfalls and interconnections, dry and wet weather outfall sampling, catchment investigation procedures, system vulnerability factor (SVF) assessment, identification of an illicit discharge, illicit discharge removal, and ongoing screening requirements. The written IDDE Program must be prepared as a standalone IDDE Plan separate from this SWMP Plan.

### 5.1.5 Annual IDDE Training

The 2016 MS4 Permit requires annual IDDE training to be provided to all employees involved in the IDDE program. Training must, at a minimum, include information on how to identify illicit discharges and SSOs and may also include additional training specific to the functions of particular personnel and their function within the framework of the IDDE program.

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## 5.2 Objectives and Goals

The Town of Sutton implements an IDDE program to systematically find and eliminate sources of non-stormwater discharges to its MS4 and implement procedures to prevent such discharges. The ultimate goal is to remove sources of pollution and improve water quality in receiving waterbodies.

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## 5.3 IDDE Program

The following sections outline how Sutton is meeting the requirements of the 2016 MS4 Permit to implement an IDDE program to locate, eliminate, and prohibit illicit discharges.

### 5.3.1 Establish Legal Authority

#### Requirements

Permittees must develop an ordinance, bylaw or regulatory mechanism to:

- Prohibit illicit discharges;
- Investigate suspected illicit discharges;
- Eliminate illicit discharges, including discharges from properties not owned by or controlled by the MS4 that discharge into the MS4 system; and
- Implement appropriate enforcement procedures and actions.

#### Work to be Performed

The Town of Sutton previously enacted an Illicit Storm Water Connections & Discharges bylaw under Article 27 of the general Town bylaws dated May 11, 2009 to meet IDDE regulatory mechanism requirements, and is provided under **Appendix B**. The Illicit Storm Water Connections & Discharges bylaw provides the Town of Sutton with adequate legal authority as required to comply with 2016 MS4 Permit requirements. The following table shows the BMP, responsible parties and measurable goals.

**Table 5-1. BMP Description – Establish IDDE Legal Authority**

<b>BMP Description</b>	<b>Responsible Parties</b>	<b>Measurable Goal</b>
<u>BMP 3-1:</u> Enact and Enforce IDDE Bylaw	Highway Department, Board of Health	Continue enforcing existing “Illicit Storm Water Connections & Discharges” IDDE bylaw and update as necessary



### 5.3.2 Complete System Mapping

#### Requirements

The 2016 MS4 Permit requires the storm system map to be updated in 2 phases. Phase I mapping must be completed within 2 years of the effective date of the permit (July 1, 2020) and include the following information:

- Outfalls and receiving waters (previously required by the MS4-2003 permit);
- Open channel conveyances (swales, ditches, etc.);
- Interconnections with other MS4s and other storm sewer systems;
- Municipally owned stormwater treatment structures;
- Waterbodies identified by name with a list of impairments as identified on the most recent EPA approved Massachusetts Integrated List of Waters report; and
- Initial catchment delineations based on topography or contributing structures.

Phase II mapping must be completed within 10 years of the effective date of the permit (July 1, 2028) and include the following information:

- Outfall locations (latitude and longitude with a minimum accuracy of +/-30 feet);
- Pipe connectivity;
- Manholes;
- Catch basins;
- Refined catchment delineations based on updated mapping information;
- Municipal sanitary sewer system; and
- Municipal combined sewer system.

#### Work to be Performed

The Town of Sutton has mapped much of its stormwater system. Current mapping status is provided in **Appendix C**. All information is incorporated into its GIS library. Where applicable, GIS information can be exported into other formats, such as Microsoft Excel, for use with annual reporting or tracking. The Town of Sutton will continue to update its stormwater mapping by the required deadlines to include the above information. The following table shows the BMPs, responsible parties and measurable goals.

**Table 5-2. BMP Description – Complete System Mapping**

<b>BMP Description</b>	<b>Responsible Parties</b>	<b>Measurable Goal</b>
<u>BMP 3-2:</u> Phase I Storm Sewer System Map	Highway Department	Complete preliminary system map within 2 years of effective date of permit
<u>BMP 3-3:</u> Phase II Storm Sewer System Map	Highway Department	Complete full system map 10 years after effective date of permit

### 5.3.3 Complete Sanitary Sewer Overflow Inventory

#### Requirements

The 2016 MS4 Permit requires municipalities to prohibit illicit discharges, including SSOs, to the separate storm sewer system. SSOs are discharges of untreated sanitary wastewater from a municipal sanitary sewer that can contaminate surface waters, cause serious water quality problems and property damage, and threaten public health. SSOs can be caused by blockages, line breaks, sewer defects that allow stormwater and groundwater to overload the system, power failures, improper sewer design, and/or vandalism.

#### Work to be Performed

The Town of Sutton completed an inventory of SSOs that have discharged to the MS4 within the 5 years prior to submitting the Year 1 Annual Report to EPA. According to the results of that inventory, there were no known SSOs to surface water or into the MS4 during those 5 years. The inventory is also included in the IDDE Plan, including the status of mitigation and corrective measures to address each identified SSO. The inventory will be updated annually as part of the Town's annual report submittal to EPA in September of each year. The following table shows the BMP, responsible parties and measurable goals.

**Table 5-3. BMP Description – Generate SSO Inventory**

<b>BMP Description</b>	<b>Responsible Parties</b>	<b>Measurable Goal</b>
<u>BMP 3-4:</u> Complete SSO Inventory	Highway Department, Board of Health	Develop SSO inventory and complete within 1 year of effective date of permit

### 5.3.4 Develop and Implement Written IDDE Program

#### Requirements

The Town of Sutton must develop an IDDE Program, the majority of which is contained in a written Illicit Discharge, Detection, and Elimination Plan, a standalone document separate from this SWMP Plan. The IDDE Plan must include a statement of responsibilities and detailed written procedures for the following:

- Assessment and priority ranking of outfalls and interconnections;
- Dry and wet weather outfall sampling;
- Catchment investigation procedures;
- System vulnerability factor (SVF) assessment;
- Identification of an illicit discharge;
- Illicit discharge removal; and
- Ongoing screening requirements.

#### Work to be Performed

Sutton has developed a written IDDE Plan as a separate standalone document to address the illicit discharge requirements of the 2016 MS4 Permit. Sutton is working towards

implementing a comprehensive IDDE Plan and program, according to the schedule set forth in the permit. The following table shows the BMPs, responsible parties and measurable goals.

**Table 5-4. BMP Description – Written IDDE Program and Program Implementation**

<b>BMP Description</b>	<b>Responsible Parties</b>	<b>Measurable Goal</b>
<u>BMP 3-5:</u> Written IDDE Program	Highway Department	Create written IDDE program within 1 year of the effective date of the permit and update periodically
<u>BMP 3-6:</u> Outfall Inventory and Ranking	Highway Department	Classify and rank outfalls and interconnections within 1 year of the effective date of the permit.
<u>BMP 3-7:</u> Implement IDDE Program	Highway Department, Board of Health	Implement catchment investigations and complete within 10 years of the effective date of the permit

### 5.3.5 Perform Dry and Wet Weather Outfall Screening

#### Requirements

Outfalls and contributing catchment areas must be categorized into Problem, High, Low, and Excluded outfalls and then ranked within each category. Additionally, catchments draining to the Blackstone River designated as impaired for pathogens must be classified as either “Problem Catchments” or “High” priority as outlined further in Section 9. The 2016 MS4 Permit then requires all outfalls classified as High and Low to be inspected for the presence of dry conditions within 3 years of the permit effective date. While completing screening, permittees must also document various physical indicators of the outfall and sample flowing outfalls. Additionally, outfalls with at least 1 SVF must also be sampled during wet weather. Depending on the results, additional screening and sampling may be required further up into the contributing catchment. Once dry and wet weather sampling is complete, additional ongoing screening shall be performed once every 5 years in accordance with the catchment prioritization and ranking. Both dry and wet weather outfall screening must be conducted in accordance with screening procedures outlined in the written IDDE Plan. All sampling results shall be reported in the permittee’s annual report.

#### Work to be Performed

Sutton developed an outfall sampling program under the IDDE Plan which is being implemented moving forward according to the schedule outlined in the 2016 MS4 Permit. This includes dry and wet weather screening on Town outfalls, including those with SVFs where applicable. Known outfalls were evaluated during dry weather conditions during 2021 and none of the sampling data collected from flowing outfalls met the Permit criteria as being highly likely to contain illicit discharges from sanitary sources. Results are documented in the IDDE Plan.

Wet weather screening on Town outfalls, including those with SVFs, will be completed at a later date where applicable. The program will be performed in accordance with the written procedures and schedules in the IDDE Plan. Ongoing screening will also be performed after the conclusion of the initial sampling rounds. The following table shows the BMPs, responsible parties and measurable goals.

**Table 5-5. BMP Description – Perform Dry and Wet Weather Outfall Screening**

<b>BMP Description</b>	<b>Responsible Parties</b>	<b>Measurable Goal</b>
<u>BMP 3-8:</u> Dry Weather Screening	Highway Department	Complete in accordance with outfall screening procedure within 3 years of the effective permit date
<u>BMP 3-9:</u> Wet Weather Screening	Highway Department	Complete in accordance with outfall screening procedure within 10 years of the effective permit date
<u>BMP 3-10:</u> Ongoing Screening	Highway Department	Conduct ongoing dry and wet weather outfall screening upon completion of the IDDE program

### 5.3.6 Perform Annual IDDE Training

The 2016 MS4 Permit requires annual IDDE training to be provided to all employees involved in the IDDE program. Thus, Sutton provides annual training that includes information on how to identify illicit discharges and may also include additional training specific to the functions of particular personnel and their function within the framework of the IDDE program. The Highway Department and Board of Health are the sole municipal departments responsible for implementing the IDDE program, and thus training focuses on these departments. Frequency and type(s) of training will be included in the annual report. The following table shows the BMP, responsible parties and measurable goals.

**Table 5-6. BMP Description – Perform Annual IDDE Training**

<b>BMP Description</b>	<b>Responsible Parties</b>	<b>Measurable Goal</b>
<u>BMP 3-11:</u> Perform IDDE Training	Highway Department, Board of Health	Complete annual training

## 5.4 Measuring IDDE Program Effectiveness

The success of the IDDE Program will be evaluated according to the following parameters:

- Storm system mapping progress;
- Number of SSOs and illicit discharges identified and removed;
- Number and percent of total outfall catchments served by the MS4 evaluated using the catchment investigation procedures;
- Updated SVF and catchment inventory and ranking;

- Dry weather and wet weather screening and sampling results;
- Estimated volume or quantity of sewage removed; and
- Number of employees successfully trained on IDDE.

The above will be tracked throughout the year and reported as part of each annual report submitted to EPA each year by September 28.

## 6 MCM 4: Construction Site Stormwater Runoff Control

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### 6.1 Summary of Permit Requirements

Under MCM 4, permittees are required to implement and enforce a program to reduce pollutants in stormwater runoff discharged to the MS4 from all construction activities that result in a land disturbance of greater than or equal to 1 acre within the regulated area. This program shall also regulate disturbances less than 1 acre if they are part of a larger common plan of development or sale that would disturb 1 or more acres. A summary of the required Construction Site Stormwater Runoff Control Program activities and timelines are provided below:

#### 6.1.1 Legal Authority

The Construction Site Stormwater Runoff Control Program shall include adequate legal authority in the form of a currently effective ordinance, bylaw, or other regulatory mechanism to:

- Require the use of sediment and erosion control practices at construction sites; and
- Include controls for other wastes on construction sites.

For permittees authorized by the MS4-2003 permit such as Sutton, the ordinance, bylaw, or other regulatory mechanism was required to be effective by May 1, 2008.

#### 6.1.2 Construction Site Stormwater Runoff Control Program

The 2016 MS4 Permit requires preparation of a written Construction Site Stormwater Runoff Control Program procedures that includes pre-construction site plan review and onsite construction inspections. Permittees must also establish requirements for developers to implement a Sediment and Erosion Control Program as part of its Construction Site Stormwater Runoff Control Program that includes BMPs to reduce pollutant sources from construction sites. This program should also include requirements for controlling other wastes during construction.

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### 6.2 Objectives and Goals

The Town of Sutton implements an effective construction stormwater runoff control program to minimize or eliminate erosion and maintain sediment onsite so that it is not transported in stormwater and allowed to discharge to a water of the U.S through the permittee's MS4.

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## 6.3 Construction Site Stormwater Runoff Control Program

The following sections outline how Sutton is meeting the requirements of the 2016 MS4 Permit to establish a Construction Site Stormwater Runoff Control Program.

### 6.3.1 Establish Legal Authority

#### Requirements

Permittees must develop an ordinance, bylaw or regulatory mechanism to:

- Require the use of sediment and erosion control practices at construction sites;
- Include controls for other wastes on construction sites.

#### Work to be Performed

Because no comprehensive construction site-related stormwater bylaw currently exists in the Town of Sutton, all of the above requirements will be addressed through the establishment of a new or amended bylaw. The Town is currently reviewing a sample bylaw and determining changes that must be made to suit the Town. The following table shows the BMP, responsible parties and measurable goals. Legal authority will be documented within **Appendix B**.

**Table 6-1. BMP Description – Establish Construction Site Legal Authority**

BMP Description	Responsible Parties	Measurable Goal
<u>BMP 4-1:</u> Develop Construction Bylaw	Planning Board, Conservation Commission, Building / Zoning Department, Zoning Board	Complete bylaw within 1 year of the effective date of the permit

### 6.3.2 Establish Written Procedures for Site Plan Review

#### Requirements

The 2016 MS4 Permit requires establishing written procedures for pre-construction plan review of the site design, planned operations, planned BMPs during the construction phase, and planned BMPs to manage runoff after development that includes the following:

- Potential water quality impacts;
- Consideration of information submitted by the public; and
- Evaluation of opportunities for use of LID and green infrastructure (GI).

#### Work to be Performed

The Town of Sutton requires site plan review as part of its site plan review and/or subdivision rules and regulations, however these regulations do not cover all development regulated under the MS4 program. The Town will reassess its current site plan review program for compliance with the 2016 MS4 Permit and make changes as required. In addition, procedures must be established to track the number of site reviews, and will be

done as part of the annual reporting requirements. The following table shows the BMP, responsible parties and measurable goals.

**Table 6-2. BMP Description – Establish Site Plan Review Procedures**

<b>BMP Description</b>	<b>Responsible Parties</b>	<b>Measurable Goal</b>
<u>BMP 4-2:</u> Develop Written Procedures for Site Plan Review	Planning Board, Conservation Commission, Building / Zoning Department, Zoning Board	Establish procedures for site plan review within 1 year of the effective date of the permit

### 6.3.3 Establish Procedures for Site Inspections and Enforcement

#### **Requirements**

The 2016 MS4 Permit requires the development of written procedures for site inspections and enforcement actions to take place both during construction of BMPs and after construction of BMPs is completed to ensure they are working as described in the approved plans. Procedures must define the following:

- Who is responsible for site inspections;
- Qualifications necessary to perform inspections;
- Who has authority to implement enforcement procedures;
- Ability to impose sanctions to ensure program compliance;
- The use of standardized inspection forms (if appropriate); and
- How to track the number inspections and enforcement actions for annual reporting.

#### **Work to be Performed**

The Town of Sutton does not have comprehensive site inspection requirements for all development regulated under the MS4 program and does not have formal written procedures. The Town will reassess its current site inspection program for compliance with the 2016 MS4 Permit and make changes as required. The following table shows the BMP, responsible parties and measurable goals.

**Table 6-3. BMP Description – Establish Site Inspections and Enforcement Procedures**

<b>BMP Description</b>	<b>Responsible Parties</b>	<b>Measurable Goal</b>
<u>BMP 4-3:</u> Develop Written Procedures for Site Inspections and Enforcement	Planning Board, Conservation Commission, Building / Zoning Department, Zoning Board	Establish procedures for site inspections and enforcement within 1 year of the effective date of the permit

### 6.3.4 Establish a Sediment and Erosion Control Program

#### **Requirements**

Permittees must establish requirements for construction site operators performing land disturbance activities within the MS4 jurisdiction that result in stormwater discharges to the



MS4 to implement a sediment and erosion control program that includes BMPs appropriate for the conditions at the construction site. Examples of sediment and erosion control measures for construction sites include local requirements to:

1. Minimize the amount of disturbed area and protect natural resources;
2. Stabilize sites when projects are complete or operations have temporarily ceased;
3. Protect slopes on the construction site;
5. Protect all storm drain inlets and armor all newly constructed outlets;
6. Use perimeter controls at the site;
7. Stabilize construction site entrances and exits to prevent off-site tracking;
8. Inspect stormwater controls at consistent intervals.

### **Work to be Performed**

The Town is working to develop a sediment and erosion control program for compliance with the 2016 MS4 Permit. This program will be incorporated into a new construction-related ordinance and emulate the above examples in order to reduce the erosion of sediments on construction sites. The following table shows the BMP, responsible parties and measurable goals.

**Table 6-4. BMP Description – Develop an Erosion and Sediment Control Program**

<b>BMP Description</b>	<b>Responsible Parties</b>	<b>Measurable Goal</b>
<u>BMP 4-4:</u> Establish a Sediment and Erosion Control Program	Planning Board, Conservation Commission, Building / Zoning Department, Zoning Board	Establish procedures for development of an erosion and sediment control program within 1 year of the effective date of the permit
<u>BMP 4-5:</u> Develop Procedures for Waste Control	Planning Board, Conservation Commission, Building / Zoning Department, Zoning Board	Establish requirements to control construction site wastes within 1 year of the effective date of the permit

## 7 MCM 5: Stormwater Management in New Development and Redevelopment

### 7.1 Summary of Permit Requirements

Under MCM 5, permittees shall develop, implement, and enforce a program to address post-construction stormwater runoff from new development and redevelopment sites that disturb 1 or more acres and discharge into an MS4 system. This program shall also regulate disturbances less than 1 acre if they are part of a larger common plan of development or sale that would disturb 1 or more acres. A summary of the required Stormwater Management in New Development and Redevelopment, also known as Post Construction Stormwater Management, activities and timelines are provided below:

#### 7.1.1 Legal Authority

The Post Construction Stormwater Management Program shall include adequate legal authority in the form of a currently effective ordinance, bylaw, or other regulatory mechanism to:

- Require LID site planning and design strategies;
- Meet many of the requirements of the Massachusetts Stormwater Handbook and associated stormwater standards;
- Incorporate runoff volume storage and/or pollutant removal requirements; and
- Meet additional requirements for TMDL and water quality limited waterbodies.

Updates must be made within 3 years of the effective permit date.

#### 7.1.2 As-Built Submittals

The permittee must require the submission of as-built drawings within 3 years after completion of construction projects and include structural and non-structural controls.

#### 7.1.3 Operation and Maintenance

The program must include procedures to ensure adequate long-term operation and maintenance of BMPs are established after completion of a construction project, along with a dedicated funding source within 3 years of the effective permit date.

#### 7.1.4 Regulatory Assessment

The permittee must complete an assessment of existing regulations that could affect creation of impervious cover to determine if changes are required to support LID. Additionally, the permittee must assess current regulations to ensure that certain green infrastructure is allowable where feasible. Any required changes must be completed within 4 years of the effective permit date.

### 7.1.5 Inventory of Potential Retrofit Sites

The permittee must complete an inventory within 4 years of the effective permit date to determine at least 5 permittee-owned properties that could be modified or retrofitted with stormwater BMP improvements.

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## 7.2 Objectives and Goals

The Town of Sutton implements and enforces a program to reduce pollutants in stormwater runoff discharged to the MS4 from all construction activities that result in a land disturbance greater than or equal to 1 acre within the regulated area.

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## 7.3 Post-Construction Stormwater Management Program

The following sections outline how Sutton is meeting the requirements of the 2016 MS4 Permit to establish a Post-Construction Stormwater Management Program.

### 7.3.1 Establish Legal Authority

#### **Requirements**

Under the 2016 MS4 Permit, permittees shall develop or modify an ordinance, bylaw, or other regulatory mechanism within 2 years of the effective date of the permit to contain provisions that are as least as stringent as the following:

1. Use LID site planning and design strategies unless infeasible;
2. Stormwater management system designs shall be consistent with, or more stringent than, the requirements of the 2008 Massachusetts Stormwater Handbook, as amended;
3. Stormwater management systems on new development shall be designed to meet an average annual pollutant removal equivalent to 90% of the average annual load of Total Suspended Solids (TSS) related to the total post-construction impervious area on the site AND 60% of the average annual load of Total Phosphorus related to the total postconstruction impervious surface area on the site as calculated based on the average annual loading and not on the basis of any individual storm event.
  - a) Average annual pollutant removal requirements are achieved through one of the following methods:
    - 1) Installing BMPs that meet the pollutant removal percentages based on calculations developed consistent with EPA Region 1's BMP Accounting and Tracking Tool (2016) or other BMP performance evaluation tool provided by EPA Region 1, where available. If EPA Region 1 tools do not address the planned or installed BMP performance, then any federally or State-approved BMP design guidance or performance standards (e.g., State stormwater handbooks and design guidance manuals) may be used to calculate BMP performance; or

- 2) Retaining the volume of runoff equivalent to, or greater than, one inch multiplied by the total post-construction impervious surface area on the new development site; or
  - 3) Meeting a combination of retention and treatment that achieves the above standards; or
  - 4) Utilizing offsite mitigation that meets the above standards within the same USGS HUC12 as the new development site.
4. Stormwater management systems on redevelopment sites shall be designed to meet an average annual pollutant removal equivalent to 80% of the average annual postconstruction load of TSS related to the total post-construction impervious area on the site AND 50% of the average annual load of Total Phosphorus related to the total post-construction impervious surface area on the site as calculated based on the average annual loading and not on the basis of any individual storm event.
- b) Average annual pollutant removal requirements are achieved through one of the following methods:
    - 1) Installing BMPs that meet the pollutant removal percentages based on calculations developed consistent with EPA Region 1's BMP Accounting and Tracking Tool (2016) or other BMP performance evaluation tool provided by EPA Region 1, where available. If EPA Region 1 tools do not address the planned or installed BMP performance, then any federally or State-approved BMP design guidance or performance standards (e.g., State stormwater handbooks and design guidance manuals) may be used to calculate BMP performance; or
    - 2) Retaining the volume of runoff equivalent to, or greater than, 0.8 inch multiplied by the total post-construction impervious surface area on the redeveloped site; or
    - 3) Meeting a combination of retention and treatment that achieves the above standards; or
    - 4) Utilizing offsite mitigation that meets the above standards within the same USGS HUC12 as the redevelopment site.
  - c) Redevelopment activities that are exclusively limited to maintenance and improvement of existing roadways, (including widening less than a single lane, adding shoulders, correcting substandard intersections, improving existing drainage systems, and repaving projects) shall improve existing conditions unless infeasible are exempt from part a) above. Roadway widening or improvements that increase the amount of impervious area on the redevelopment site by greater than or equal to a single lane width shall meet the requirements of part a) above.

Additionally, the bylaw must include requirements for stormwater structural BMPs proposed as part of new or redevelopment to be optimized as follows in order to meet TMDL and water quality limited waterbodies requirements:

- For nitrogen removal for development within the Long Island Sound watershed (Long Island Sound Nitrogen TMDL);

- For phosphorus removal for development within the Blackstone River watershed; and
- Require designs that allow for spill containment to isolate the MS4 in the event of an emergency spill or other event on commercial and industrial projects within the Blackstone River, Mumford River, Number 1 Pond, and Sutton Falls watersheds.

See Section 9 for more information.

### Work to be Performed

Because no post-construction site-related stormwater bylaw currently exists in the Town of Sutton, all of the above requirements will be addressed through the establishment of a new or amended bylaw. The Town is currently reviewing a sample bylaw and determining changes that must be made to suit the Town. The following table shows the BMP, responsible parties and measurable goals. Legal authority is documented in **Appendix B**.

**Table 7-1. BMP Description – Establish Post-Construction Site Legal Authority**

<b>BMP Description</b>	<b>Responsible Parties</b>	<b>Measurable Goal</b>
<u>BMP 5-1:</u> Develop and Enforce Post-Construction Bylaw	Planning Board, Conservation Commission, Building / Zoning Department, Zoning Board	Complete bylaw within 2 years of the effective date of the permit

### 7.3.2 Require Submittal of As-Built Plans

The permittee must require the submission of as-built drawings that include structural and non-structural stormwater controls within 2 years after completion of construction projects. The Town of Sutton does not currently require submittal of as-builts. The Town is working on incorporating procedures for submittal of as-builts as part of its stormwater regulatory updates. The following table shows the BMP, responsible parties and measurable goals.

**Table 7-2. BMP Description – Require Submittal of As-Built Plans**

<b>BMP Description</b>	<b>Responsible Parties</b>	<b>Measurable Goal</b>
<u>BMP 5-2:</u> Require Stormwater As-Built Plan Submittal	Planning Board, Conservation Commission, Building / Zoning Department	Require submittal of as-built plans for completed projects within 2 years of completion

### 7.3.3 Require Long Term Operation and Maintenance

As part of its Post Construction Stormwater Management Program, the Town of Sutton shall develop procedures to ensure that the adequate long-term operation and maintenance of

BMPs is accounted for at the conclusion of a construction project, along with a dedicated funding source, within 2 years of the effective permit date. The Town is working on requiring long term operation and maintenance as part of its stormwater regulatory updates. The following table shows the BMP, responsible parties and measurable goals.

**Table 7-3. BMP Description – Require Long Term Operation and Maintenance Plans**

<b>BMP Description</b>	<b>Responsible Parties</b>	<b>Measurable Goal</b>
<u>BMP 5-3:</u> Require Long Term Operation and Maintenance	Planning Board, Conservation Commission, Building / Zoning Department	Require submittal of operation and maintenance plans and dedicated funding to ensure long term maintenance within 2 years of the effective date of the permit

### 7.3.4 Complete Regulatory Assessment

#### **Requirements**

The 2016 MS4 permit requires permittees to complete a report that assesses current street design, parking lot guidelines, and other local requirements that could affect creation of impervious cover to determine if changes to existing design standards are required to support LID. If the assessment indicates that changes can be made, the assessment shall include recommendations and proposed schedules to incorporate policies and standards into relevant documents and procedures to minimize impervious cover. Any required changes to reduce mandatory creation of impervious cover in support of LID should be made within 4 years of the effective permit date.

Additionally, the permittee must complete a report that assesses current regulations to determine the feasibility of allowing green roofs, infiltration practices, porous/pervious pavement, and water harvesting/storage devices where feasible. The assessment must indicate if the practices are allowed in the MS4 area and under what circumstances they are allowed. If the practices are not allowed, the permittee shall determine what hinders the use of these practices, what changes in local regulations may be made to make them allowable, and provide a schedule for implementation of recommendations. Any required changes to allow for these BMPs must be completed within 4 years of the effective permit date.

#### **Work to be Performed**

The Town of Sutton has not yet performed a comprehensive review of all regulations for the above items. The Town will prepare a report assessing requirements that affect the creation of impervious cover. This assessment will determine if design standards for streets and parking lots can be modified to support low impact design options. The Town will also prepare a report assessing existing local regulations to determine the feasibility of making green infrastructure – such as green roofs, infiltration practices, and water harvesting devices – allowable when appropriate site conditions exist. When completed, the reports will be part of this Stormwater Management Plan. Review and updates to relevant regulations will be completed within 4 years of the effective permit date to meet permit

requirements. The following table shows the BMPs, responsible parties and measurable goals.

**Table 7-4. BMP Description – Complete LID and GI Regulatory Updates**

<b>BMP Description</b>	<b>Responsible Parties</b>	<b>Measurable Goal</b>
<u>BMP 5-4:</u> Allow green infrastructure	Planning Board, Conservation Commission, Building / Zoning Department	Complete regulatory updates within 4 years of the effective date of the permit
<u>BMP 5-5:</u> Street design and parking lot guidelines	Planning Board, Conservation Commission, Building / Zoning Department	Complete regulatory updates within 4 years of the effective date of the permit

### 7.3.5 Complete Inventory of Potential BMP Retrofit Sites

#### Requirements

Permittees must complete an inventory of at least 5 existing permittee-owned properties that could be modified or retrofitted with structural stormwater BMP improvements to reduce the frequency, volume, and pollutant loads within 4 years of the effective permit date. The inventory provided in **Appendix D** should include municipal properties with significant impervious cover such as parking lots, buildings, and maintenance yards, along with infrastructure such as existing rights-of-way, outfalls and stormwater conveyances such as swales or detention practices. The permittee should address potential site constraints that could hinder BMP construction, such as subsurface conditions, depth to water table, and utility impacts, and should ideally allow opportunities for public education.

Beginning with the fifth annual report, should BMPs at 1 or more sites be constructed, the inventory should be updated so that it always contains at least 5 sites in the inventory for potential improvement. The permittee must report on all properties that have been modified or retrofitted to mitigate impervious area.

Additionally, the Town of Sutton must identify stormwater retrofit opportunities in order to meet TMDL and water quality limited waterbodies requirements as follows:

- For nitrogen reduction within the Long Island Sound watershed; and
- For stormwater infiltration for development within the Blackstone River watershed.

See Section 9 for more information.

#### Work to be Performed

The Town of Sutton will identify minimum of five town properties that can be retrofitted to reduce pollutant loads of discharges into and from MS4 infrastructure (including street right-of-ways, conventional conveyances, outfalls and controls). The Town will evaluate and rank retrofits for control of stormwater discharges to first or second order streams, public swimming beaches, water supply sources, water quality limited waters and other critical

areas. This inventory will be maintained in **Appendix D** and will be completed within 4 years of the effective date of the permit. This inventory will be updated continuously starting in Year 5. The following table shows the BMP, responsible parties and measurable goals.

**Table 7-5. BMP Description – Complete Inventory of Properties for BMP Retrofit**

<b>BMP Description</b>	<b>Responsible Parties</b>	<b>Measurable Goal</b>
<u>BMP 5-6:</u> Target properties to reduce impervious area	Planning Board, Conservation Commission, Building / Zoning Department	Complete inventory within 4 years of the effective date of the permit and update annually on retrofitted properties



## 8 MCM 6: Good Housekeeping and Pollution Prevention

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### 8.1 Summary of Permit Requirements

Under MCM 6, permittees shall develop and implement an operations and maintenance program to reduce stormwater pollution from permittee activities. This includes optimizing existing activities related to parks and open space, buildings and facilities, vehicles and equipment, and stormwater infrastructure maintenance. A summary of the required Good Housekeeping and Pollution Prevention for Permittee Owned Operations activities and timelines is provided below.

#### 8.1.1 Operations and Maintenance Programs

Permittees shall develop written operations and maintenance procedures for parks and open space, buildings and facilities, vehicles and equipment, winter road maintenance, stormwater infrastructure, and structural stormwater BMPs within 2 years of the effective permit date. This program shall also optimize catch basin cleaning and street sweeping, along with establishing proper storage techniques for cleaning residuals. All maintenance activities, inspections, and training shall be logged for annual reporting.

#### 8.1.2 Stormwater Pollution Prevention Plans

Develop and implement Stormwater Pollution Prevention Plans (SWPPPs) for municipally-owned maintenance garages, public works yards, transfer stations within 2 years of the effective permit date.

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### 8.2 Good Housekeeping and Pollution Prevention Program

The following sections outline how Sutton is meeting the requirements of the 2016 MS4 Permit to establish a Good Housekeeping and Pollution Prevention Program.

#### 8.2.1 Complete Facilities O&M Procedures

##### **Requirements**

The permittee must complete an inventory of all parks and open space, buildings and facilities where pollutants are exposed to stormwater runoff, including those coming from vehicles and equipment, within 2 years of the permit effective date. The inventory must be reviewed annually and updated as necessary. Upon completion, the permittee must establish written procedures as part of a Operation and Maintenance Plan within 2 years of the permit effective date for the following items:

### Parks and Open Space

- Proper use, storage, and disposal of pesticides, herbicides, and fertilizers;
- Lawn maintenance and landscaping activities to protect water quality, such as reducing mowing, lawn clippings handling, and use of alternative materials;
- Pet waste handling collection and disposal locations at all locations where pets are permitted, including signage;
- Control of waterfowl in areas where they congregate to reduce waterfowl droppings from entering the MS4s;
- Management of trash containers; and
- Addressing erosion or poor vegetative cover, particularly near a surface waterbody.

### Buildings and Facilities

- Use, storage, and disposal of petroleum products and other potential pollutants.
- Materials handling training to applicable employees;
- Ensuring that Spill Prevention, Control, and Countermeasures (SPCC) Plans are in place if needed (aboveground petroleum storage greater than 1,320 gallons or underground petroleum storage greater than 42,000 gallons);
- Dumpsters and other waste management equipment; and
- Sweeping parking lots and keeping facility areas clean to reduce pollutants.

### Vehicles and Equipment

- Storage of vehicles to prevent fluid leaks to stormwater;
- Fueling area evaluation, including feasibility of fueling under cover; and
- Preventing vehicle wash waters from entering surface waters or the MS4.

### **Work to be Performed**

The Town has prepared a comprehensive written O&M Plan, a standalone document separate from this SWMP Plan, that meets the above requirements. This document also includes the inventory of relevant Town-owned properties. In addition, the Town's O&M Plan established requirements for use of slow release fertilizers on permittee owned properties and establish procedures to manage grass cuttings and leaf litter on permittee property within areas of town draining to the Long Island Sound watershed, a waterbody impaired for nitrogen. This plan also established requirements for use of slow release and phosphorus-free fertilizers on permittee owned properties and established procedures to manage grass cuttings and leaf litter, including prohibitions for blowing organic waste materials onto impervious surfaces for areas of town draining to the Blackstone River watershed, a waterbody impaired for phosphorus. The following table shows the BMP, responsible parties and measurable goals.

**Table 8-1. BMP Description – Complete Written Facilities O&M Procedures**

<b>BMP Description</b>	<b>Responsible Parties</b>	<b>Measurable Goal</b>
<u>BMP 6-1:</u> Inventory open spaces, buildings and facilities, and vehicles and equipment	Highway Department, Recreation Department	Complete inventory of open spaces, buildings and facilities, and vehicles and equipment within 2 years of the effective date of the permit

**Table 8-1 (continued). BMP Description – Complete Written Facilities O&M Procedures**

<b>BMP Description</b>	<b>Responsible Parties</b>	<b>Measurable Goal</b>
<u>BMP 6-2:</u> Establish Operation and Maintenance Procedures	Highway Department, Recreation Department	Create written O&M Plan for open spaces, buildings and facilities, and vehicles and equipment within 2 years of the effective date of the permit

## 8.2.2 Complete Infrastructure O&M Procedures

### Requirements

The permittee must establish written procedures as part of an Operation and Maintenance Plan within 2 years of the permit effective date to ensure that MS4 infrastructure is maintained in a timely manner to reduce the discharge of pollutants from the MS4 for the following items:

#### Street Sweeping (Appendix E)

- Sweeping all streets and permittee-owned parking lots, with the exception of rural uncurbed roads with no catch basins or high-speed limited access highways at least 1 per year in the spring following winter sanding events;
- More frequent sweeping of targeted areas based on inspections, land use, or known water quality impacts;
- Increasing street sweeping frequency of all municipal owned streets and parking lots to a minimum of 2 times per year; once in the spring (following winter activities such as sanding) and at least once in the fall (Sept 1 – Dec 1; following leaf fall) for areas within the nitrogen-impaired Long Island Sound watershed and phosphorus-impaired Blackstone River watershed;
- Increased street sweeping to target areas with higher pollutant loads based on land use; and
- For rural uncurbed roadways with no catch basins or limited access highways, either an evaluation to meet the minimum frequencies above or development and implementation of an inspection, documentation, and targeted sweeping plan within 2 years of the effective date and submitted with the Year 1 annual report.

#### Catch Basin Cleaning (Appendix F)

- Prioritization of catch basins located near construction activities for more frequent inspection and maintenance;
- Establishing a schedule with a goal that at the time of maintenance, no catch basin is more than 50% full;
- For catch basins that are more than 50% full during 2 consecutive inspections or cleaning events, methods for investigating the contributing drainage area for sources of excessive sediment loads; and
- Establishing a plan for optimizing catch basin cleaning, inspections, and documentation.

#### Catch Basin and Street Sweeping Residuals Management

- Ensure proper storage of catch basins cleanings and street sweepings prior to disposal or reuse such that they are not discharged to receiving waters based on available MassDEP policies.

#### Winter Operation and Maintenance

- Establish and implement procedures for winter road maintenance including the use and storage of salt and sand
- Minimizing use of sodium chloride and other salts and evaluation of opportunities to use alternative materials; and
- Ensuring that snow disposal activities do not result in disposal of snow into waters of the United States.

#### **Work to be Performed**

The Town recently updated its existing street sweeping, catch basin cleaning, and winter O&M procedures in order to meet permit requirements. Street sweeping will continue under the existing Street Sweeping Prioritization Plan provided in **Appendix E** with much of the Town being swept twice per year due to the presence of nitrogen and phosphorus-impaired waterbodies. Catch basin prioritization will also continue according to the methodology and schedule outlined in the Catch Basin Optimization Plan provided in **Appendix F**. Results will be reviewed after each year to determine recommended next steps. The following table shows the BMP, responsible parties and measurable goals.

**Table 8-2. BMP Description – Complete Written Infrastructure O&M Procedures**

<b>BMP Description</b>	<b>Responsible Parties</b>	<b>Measurable Goal</b>
<u>BMP 6-3:</u> Review Infrastructure O&M Procedures	Highway Department	Create written O&M Plan for stormwater infrastructure within 2 years of the effective date of the permit
<u>BMP 6-4:</u> Catch Basin Cleaning	Highway Department	Clean catch basins on established schedule and report number of catch basins cleaned and volume of material moved annually
<u>BMP 6-5:</u> Street Sweeping	Highway Department	Sweep all streets and parking lots at least annually and sweep all streets within the Long Island Sound, Blackstone River, Mumford River, Number 1 Pond, and Sutton Falls watersheds twice per year.
<u>BMP 6-6:</u> Road salt optimization program	Highway Department	Implement salt use optimization during winter maintenance operations

### 8.2.3 Stormwater Pollution Prevention Plans

#### Requirements

The permittee must establish written Stormwater Pollution Prevention Plans for the following permittee-owned or operated facilities: maintenance garages, public works yards, transfer stations, and other waste handling facilities where pollutants are exposed to stormwater as determined by the permittee. SWPPPs must address a number of components, including the following:

- Pollution Prevention Team;
- Facility description, identification of potential pollutant sources, and identification of stormwater controls;
- Stormwater management practices, including measures to minimize or prevent exposure, good housekeeping and preventative maintenance, spill prevention and response, erosion and sediment control, management of runoff, salt storage, employee training, and control measure maintenance; and
- Procedures for site inspections and sampling.

#### Work to be Performed

The Town of Sutton has determined that one facility meets the above requirements, the Sutton Highway Department Garage. A SWPPP has been prepared for this facility as a separate standalone document which should be updated when there is a significant change in design, construction, operation, or maintenance of the facility that affects the discharge or potential discharge of pollutants. This plan is made available in hardcopy at the Sutton Highway Department Garage to members of federal, state, or local agencies during normal working hours for review upon request. Copies of the SWPPP are accessible to all persons responsible for implementing and administering it. The following table shows the BMP, responsible parties and measurable goals.

**Table 8-3. BMP Description – Prepare SWPPPs for Regulated Facilities**

<b>BMP Description</b>	<b>Responsible Parties</b>	<b>Measurable Goal</b>
<u>BMP 6-7:</u> Assess regulated facilities to determine SWPPP eligibility	Highway Department	Complete facilities assessment within 2 years of the effective date of permit.
<u>BMP 6-8:</u> Develop SWPPPs for applicable facilities	Highway Department	Complete and implement within 2 years of the effective date of the permit

### 8.2.4 Structural Stormwater BMP Inspections

#### Requirements

The permittee must establish and implement written inspection and maintenance procedures and frequencies for all stormwater treatment structures, such as infiltration and detention basins, proprietary stormwater treatment structures, gravel wetlands, etc. at least annually.

### Work to be Performed

The Town of Sutton will develop an inventory (**Appendix G**) of known structural stormwater BMPs as required by MCM 3, mapping requirements. Once an inventory has been completed, the Town will develop appropriate inspection and maintenance procedures for the various types of BMPs located within the Town's regulated area. The O&M Plan will also document logs for BMP inspection and maintenance. The following table shows the BMP, responsible parties and measurable goals.

**Table 8-4. BMP Description – Inspect Structural BMPs Annually**

<b>BMP Description</b>	<b>Responsible Parties</b>	<b>Measurable Goal</b>
<u>BMP 6-9:</u> Establish BMP O&M Procedures	Highway Department	Create written O&M Plan for stormwater BMPs within 2 years of the effective date of the permit
<u>BMP 6-10:</u> Inspect and maintain stormwater BMPs	Highway Department	Inspect and maintain treatment structures annually

BMP inspection SOPs and results will be tracked under the standalone O&M Plan under separate cover.

### 8.2.5 Perform Periodic Good Housekeeping Training

The Town of Sutton Highway Department also performs periodic training on good housekeeping and other best management practices as related to MS4 maintenance, street sweeping, catch basin cleaning, winter operations, and other relevant topics. Training is generally performed at least annually. The following table shows the BMP, responsible parties and measurable goals.

**Table 8-5. BMP Description – Perform Annual IDDE Training**

<b>BMP Description</b>	<b>Responsible Parties</b>	<b>Measurable Goal</b>
<u>BMP 6-11:</u> Good Housekeeping Training	Highway Department	Complete annual training

## 9 TMDL and Impaired Waters Controls

### 9.1 Permit Requirements

The 2016 MS4 Permit requires regulated operators of MS4s to determine whether stormwater discharges from their MS4 contribute to any impaired waterbodies, including those subject to an approved TMDL and certain water quality limited waterbodies. Water quality limited waters are any waterbodies that do not meet applicable water quality standards, including waterbodies listed in categories “4a” and “5” on the Massachusetts Integrated List of Waters, also known as the “303(d) List”. MassDEP is responsible for preparing TMDLs for many of these listed waters to identify the problem pollutant and establish water quality goals. TMDLs are prepared based on the priority assigned to the waterbody and are being completed over the course of several years.

As outlined in Section 2.3, the Town of Sutton is subject to the following TMDL and impaired waters requirements:

**Table 9-1. TMDL and Impaired Waters Requirements**

Waterbody Name	Impairment	2016 Permit Requirements
Long Island Sound	Nitrogen	Appendix F, Part B.I
Blackstone River	Phosphorus	Appendix H, Part II
	Bacteria (e.coli)	Appendix H, Part III
	Metals (lead)	Appendix H, Part V
	Sedimentation/siltation	Appendix H, Part V
	Turbidity	Appendix H, Part V
Mumford River	Metals (copper, lead)	Appendix H, Part V
Number 1 Pond	Turbidity	Appendix H, Part V
Sutton Falls	Turbidity	Appendix H, Part V

Thus, the Town of Sutton must implement control measures for discharges to approved TMDL waters and to impaired waters without a TMDL as summarized in the sections below.

### 9.2 Long Island Sound Nitrogen TMDL Requirements

The Town of Sutton is subject to the Long Island Sound nitrogen TMDL and thus is required to implement the following requirements as outlined under Appendix F, Part B.I of the 2016 Permit.

#### 9.2.1 Additional or Enhanced BMPs

The Town of Sutton must include the following additional or enhanced BMPs, in addition to the 6 MCMs outlined previously:

- **Public Education** – supplement its Residential and Business/Commercial/Institution programs with additional annual messages as follows:
  - Spring (April-May): Proper use and disposal of grass clippings and use of slow-release fertilizers;
  - Summer (June-July): Proper management of pet waste; and
  - Fall (August-October): Proper disposal of leaf litter.
- **Stormwater Management in New Development and Redevelopment** – supplement standard permit bylaw requirements to also mandate the use of stormwater BMPs optimized for nitrogen removal as part of new development and redevelopment projects. Additionally, retrofit opportunities must also consider the potential to reduce nitrogen discharges for properties within watersheds draining to nitrogen-impaired waterbodies.
- **Good Housekeeping and Pollution Prevention** – establish requirements for reducing fertilizer usage and/or using slow release fertilizers on permittee owned properties, procedures for properly managing grass cuttings and leaf litter on permittee owned property, and prohibit blowing organic waste onto impervious surfaces. Additionally, street sweeping must be increased to at least twice per year, once in the spring and once in the fall.

## 9.2.2 Nitrogen Source Identification Report

The Town of Sutton must also prepare a Nitrogen Source Identification Report that generally does the following:

- Identifies, delineates, and prioritizes areas of town at the catchment-level that have the highest nitrogen loading potential based on land use and other factors;
- Accounts for the urbanized area that discharges to the Connecticut River watershed;
- Determines impervious area based on catchment delineations;
- Accounts for any screening results performed under MCM 3 when developing conclusions; and
- Identifies potential retrofit opportunities for installing structural BMPs during redevelopment.

This item must be completed by the end of Year 4.

## 9.2.3 Structural BMPs

Upon completion of the Nitrogen Source Identification Report, the Town must evaluate all properties identified under the report or using the procedures identified under Section 7.4.5 to complete a site-specific evaluation addressing the following:

- Identifies the next planned redevelopment activity or planned retrofit date;
- Determines an estimated cost of redevelopment or retrofit BMPs; and
- Determines the engineering and regulatory feasibility BMP installation.



Upon completion, the Town must provide a list of planned structural BMPs, along with a plan and schedule for implementation by the end of Year 5. At least 1 BMP must be designed and constructed as a demonstration project by the end of Year 6 that targets a catchment with a high nitrogen load potential. Remaining structural BMPs must be constructed according to the provided plan and schedule. Nitrogen removals must be tracked and reported annually.

### Work to be Performed

Requirements for meeting the Long Island Sound nitrogen TMDL requirements are being performed according to the schedule in the 2016 Permit.

**Table 9-2. TMDL Requirements – Long Island Sound Nitrogen**

BMP Description	Responsible Parties	Measurable Goal
BMP 7-1: TMDL Requirements – Long Island Sound Nitrogen	Highway Department, Conservation Commission, Planning Board	Adhere to requirements in part B.I of Appendix F

## 9.3 Phosphorus Water Quality Limited Waterbody Requirements

The Town of Sutton is subject to the phosphorus water quality limited waterbody requirements for discharges to the Blackstone River and thus is required to implement the following requirements as outlined under Appendix H, Part II of the 2016 Permit.

### 9.3.1 Additional or Enhanced BMPs

The Town of Sutton must include the following additional or enhanced BMPs, in addition to the 6 MCMs outlined previously:

- **Public Education** – supplement its Residential and Business/Commercial/Institution programs with additional annual messages as follows:
  - Spring (April-May): Proper use and disposal of grass clippings and use of slow-release and phosphorus-free fertilizers;
  - Summer (June-July): Proper management of pet waste; and
  - Fall (August-October): Proper disposal of leaf litter.
- **Stormwater Management in New Development and Redevelopment** – supplement standard permit bylaw requirements to also mandate the use of stormwater BMPs optimized for phosphorus removal as part of new development and redevelopment projects. Additionally, retrofit opportunities must consider opportunities for constructing infiltration BMPs for properties within the watershed.
- **Good Housekeeping and Pollution Prevention** – establish requirements for reducing fertilizer usage and/or using slow release fertilizers on permittee owned properties, procedures for properly managing grass cuttings and leaf litter on permittee owned property, and prohibit blowing organic waste onto impervious

surfaces. Additionally, street sweeping must be increased to at least twice per year, once in the spring and once in the fall.

### 9.3.2 Phosphorus Source Identification Report

The Town of Sutton must also prepare a Phosphorus Source Identification Report that generally does the following:

- Identifies, delineates, and prioritizes areas of town at the catchment-level that have the highest phosphorus loading potential based on land use and other factors;
- Accounts for the urbanized area that discharges to the Blackstone River watershed;
- Determines impervious area based on catchment delineations;
- Accounts for any screening results performed under MCM 3 when developing conclusions; and
- Identifies potential retrofit opportunities for installing structural BMPs during redevelopment.

This item must be completed by the end of Year 4.

### 9.3.3 Structural BMPs

Upon completion of the Phosphorus Source Identification Report, the Town must evaluate all properties identified under the report or using the procedures identified under Section 7.4.5 to complete a site-specific evaluation addressing the following:

- Identifies the next planned redevelopment activity or planned retrofit date;
- Determines an estimated cost of redevelopment or retrofit BMPs; and
- Determines the engineering and regulatory feasibility BMP installation.

Upon completion, the Town must provide a list of planned structural BMPs, along with a plan and schedule for implementation by the end of Year 5. At least 1 BMP must be designed and constructed as a demonstration project by the end of Year 6 that targets a catchment with a high phosphorus load potential. Remaining structural BMPs must be constructed according to the provided plan and schedule. Phosphorus removals must be tracked and reported annually.

#### Work to be Performed

Requirements for meeting the phosphorous water quality limited waterbody requirements are being performed according to the schedule in the 2016 Permit.

**Table 9-3. Water Quality Limited Waterbody Requirements – Phosphorus**

BMP Description	Responsible Parties	Measurable Goal
<u>BMP 7-2:</u> Water Quality Limited Waterbody Requirements – Phosphorus	Highway Department, Conservation Commission, Planning Board	Adhere to requirements in Part II of Appendix H

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## 9.4 Bacteria Water Quality Limited Waterbody Requirements

The Town of Sutton currently has 1 waterbody, the Blackstone River, listed as impaired for E.coli. Thus, the Town is required to implement the following requirements as outlined under Appendix H, Part III of the 2016 Permit.

### 9.4.1 Additional or Enhanced BMPs

The Town of Sutton must include the following additional or enhanced BMPs, in addition to the 6 MCMs outlined previously:

- **Public Education** – supplement its Residential program with an annual message encouraging the proper management of pet waste and disseminate educational materials to dog owners at the time of issuance or renewal of a dog license. Education materials shall describe the detrimental impacts of improper management of pet waste, requirements for waste collection and disposal, and penalties for non-compliance. The Town also must provide information to owners of septic systems about proper maintenance in any catchment that discharges to a water body impaired for bacteria or pathogens.
- **Illicit Discharge, Detection, and Elimination** – designate catchments draining to bacteria or pathogen impaired segments as “Problem Catchments” or “High” priority.

#### Work to be Performed

Public education requirements have been incorporated into future public education outreach components as described in Section 3. IDDE requirements have been incorporated into Sutton’s IDDE Plan.

**Table 9-4. TMDL Requirements – Fecal Coliform**

BMP Description	Responsible Parties	Measurable Goal
<u>BMP 7-3</u> : TMDL Requirements – E.coli	Highway Department, Conservation Commission, Planning Board	Adhere to requirements in part III of Appendix H

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## 9.5 Metals and Solids Water Quality Limited Waterbody Requirements

The Town of Sutton is subject to the metals and solids water quality limited waterbody requirements for discharges to the Blackstone River, Mumford River, Number 1 Pond, and Sutton Falls and thus is required to implement the following requirements as outlined under Appendix H, Part V of the 2016 Permit.

### 9.5.1 Additional or Enhanced BMPs

The Town of Sutton must include the following additional or enhanced BMPs, in addition to the 6 MCMs outlined previously:

- **Stormwater Management in New Development and Redevelopment** – supplement standard permit bylaw requirements to also mandate designs that allow for shutdown and containment where appropriate to isolate the MS4 in the event of an emergency spill or other event on commercial and industrial projects within the Blackstone River, Mumford River, Number 1 Pond, and Sutton Falls watersheds. Additionally, EPA encourages stormwater infiltration systems to provide additional pollutant removals.
- **Good Housekeeping and Pollution Prevention** – increased street sweeping to target areas with higher pollutant loads based on land use.

#### Work to be Performed

Requirements for meeting the phosphorous water quality limited waterbody requirements are being performed according to the schedule in the 2016 Permit.

**Table 9-5. Water Quality Limited Waterbody Requirements – Metals**

BMP Description	Responsible Parties	Measurable Goal
<u>BMP 7-4</u> : Water Quality Limited Waterbody Requirements – Metals	Highway Department, Conservation Commission, Planning Board	Adhere to requirements in Part V of Appendix H

## 10 Annual Reporting

The permittee shall submit annual reports each year of the permit term. The reporting period is a one-year period commencing on the permit effective date, and subsequent anniversaries thereof, except that the first annual report under this permit shall also cover the period from May 1, 2018 to the permit effective date. The annual report is due 90 days from the close of each reporting period, or by September 28 of each year. The annual reports must contain the following relevant information which should be tracked throughout the year, and should be filed within **Appendix H**:

- A self-assessment review of compliance with the permit terms and conditions.
- An assessment of the appropriateness of the selected BMPs.
- The status of any plans or activities, including:
  - Identification of all discharges determined to be causing or contributing to an exceedance of water quality standards and description of response;
  - For discharges subject to TMDL or water quality limited waterbody requirements, identification of BMPs used to address the impairment and assessment of the BMPs effectiveness;
  - For discharges to water quality limited waters a description of each BMP and any deliverables required.
- An assessment of the progress towards achieving the measurable goals and objectives of each of the 6 minimum measures:
  - Evaluation of the public education program including a description of the targeted messages for each audience; method and dates of distribution; methods used to evaluate the program; and any changes to the program.
  - Description of the activities used to promote public participation including documentation of compliance with state public notice regulations.
  - Description of IDDE activities including: status of mapping and results of the ranking and assessment; identification of problem catchments; status of all IDDE Plan components; number and identifier of catchments evaluated; number and identifier of outfalls screened; number of illicit discharges located and removed; gallons of flow removed; identification of tracking indicators and measures of progress; and employee training.
  - Evaluation of construction runoff management including number of project plans reviewed; number of inspections; and number of enforcement actions.
  - Evaluation of stormwater management for new and redevelopment including status of bylaw development; review and status of the street design and barriers to green infrastructure assessment; and inventory status.
  - Status of the O&M Programs.
  - Status of SWPPPs, including inspection results.
- All outfall screening and monitoring data during the reporting period and cumulative for the permit term; and a description of any additional monitoring data received by the permittee during the reporting period.
- Description of activities for the next reporting cycle.
- Description of any changes in identified BMPs or measurable goals.
- Description of activities undertaken by any entity contracted for achieving any measurable goal or implementing any control measure.

## 11 Implementation of Best Management Practices

The Town of Sutton's Best Management Practices Plan as outlined in the Town's NOI (**Appendix A**) is summarized in **Table 11-1**.

For consistency with the 6 MCMs and impaired water requirements, the BMPs are broken down into 7 categories:

1. Public Education and Outreach;
2. Public Participation and Involvement;
3. Illicit Discharge Detection and Elimination;
4. Construction Site Stormwater Runoff Control;
5. Stormwater Management in New Development and Redevelopment;
6. Good Housekeeping and Pollution Prevention; and
7. TMDL and Water Quality Limited Waterbodies Controls

The BMP tables also outline the measurable goals for each BMP to gauge permit compliance, the responsible party(ies) for implementing each BMP, and an implementation schedule to be used throughout the permit period. In addition to the implementation activities outlined in this plan, the Town will also perform the following activities throughout the duration of the permit:

1. **Program Evaluation** – conduct annual evaluations of the Stormwater Management Program for compliance with permit conditions. The evaluation must include a determination of the appropriateness of the selected BMPs in efforts towards achieving the measurable goals outlined in **Table 11-1**.
2. **Record Keeping** – maintain records that pertain to the Stormwater Management Program for a period of at least 5 years. Records need to be made available to the public and the Town may charge a reasonable fee for copying. Records need not be submitted to EPA or MassDEP unless specifically requested.
3. **Reporting** – submit an annual report to EPA and MassDEP, including the information as noted in Section 10.

Refer to the following link for a copy of the 2016 MA MS4 Permit:

<https://www.epa.gov/npdes-permits/massachusetts-small-ms4-general-permit>

Table 11-1. Proposed BMP Plan - Implementation of Phase II Activities											
BMP ID	BMP Description	Implementation	Responsible Dept./Person	Measurable Goal	Report Section	Year / Schedule					
						1	2	3	4	5	6
						7/1/18-7/1/19	7/1/19-7/1/20	7/1/20-7/1/21	7/1/21-7/1/22	7/1/22-7/1/23	7/1/23-7/1/24
1. Public Education and Outreach											
1-1	Residential Education Program	1. Distribute educational flyers on water quality and stormwater BMPs at town offices, public buildings, and town meetings.	Highway Department	Distribute flyers and brochures continually	3.4.1	*	*	*	*	*	*
		2. Provide fact sheets on pet waste management with all dog registrations and renewals.	Town Clerk	Provide information with all applications and renewals		*	*	*	*	*	*
		3. Provide relevant stormwater information to different audiences via social media.	Information Technology	Follow statewide "Think Blue" campaign on social media platforms.			*	*	*	*	*
		4. Provide comprehensive stormwater information on the Town's website, including effects of outdoor activities such as illicit storm drain dumping, private septic system and well maintenance, proper hazardous waste disposal, and use of detergents, fertilizers, etc., and use of environmentally friendly products.	Information Technology, Highway Department	Continue to update and maintain the websites to include relevant stormwater information		*	*	*	*	*	*
1-2	Businesses, Institutions, and Commercial Education Program	1. Provide comprehensive stormwater information on the Town's website, including effects of outdoor activities such as lawn care on water quality; benefits of appropriate on-site infiltration of stormwater; building maintenance and storage of materials; proper use and storage of salt or other de-icing and anti-icing materials; proper management of waste materials and dumpsters; proper management of parking lot surfaces; proper car care activities; and proper disposal of swimming pool water by entities such as motels, hotels, and health and country clubs.	Information Technology, Highway Department	Continue to update and maintain the websites to include relevant stormwater information	3.4.2	*	*	*	*	*	*
		2. Provide relevant stormwater information to different audiences via social media.	Information Technology	Follow statewide "Think Blue" campaign on social media platforms.			*	*	*	*	*
1-3	Developer and Construction Education Program	1. Provide relevant stormwater information to different audiences via social media.	Information Technology	Follow statewide "Think Blue" campaign on social media platforms.	3.4.3		*	*	*	*	*
		2. Provide comprehensive stormwater information on the Town's website, including proper sediment and erosion control management practices; information about Low Impact Development (LID) principles and technologies; and information about EPA’s construction general permit (CGP).	Information Technology, Highway Department	Continue to update and maintain the websites to include relevant stormwater information		*	*	*	*	*	*
		3. Distribute fact sheets or brochures on erosion and sediment control with building permit applications.	Planning Board, Conservation Commission, Building / Zoning Department, Zoning Board	Provide information with all applications		*	*	*	*	*	*
1-4	Industrial Education Program	1. Provide comprehensive stormwater information on the Town's website, including equipment inspection and maintenance; proper storage of industrial materials; proper management and disposal of wastes; proper management of dumpsters; minimization of use and proper storage of salt or other de-icing/anti-icing materials; benefits of appropriate on-site infiltration of stormwater runoff from areas with low exposure to industrial materials such as roofs or employee parking; proper maintenance of parking lot surfaces; and information about EPA’s CGP.	Highway Department, Information Technology	Continue to update and maintain the websites to include relevant stormwater information	3.4.4	*	*	*	*	*	*
		2. Provide relevant stormwater information to different audiences via social media.	Information Technology	Follow statewide "Think Blue" campaign on social media platforms.			*	*	*	*	*

Table 11-1. Proposed BMP Plan - Implementation of Phase II Activities											
BMP ID	BMP Description	Implementation	Responsible Dept./Person	Measurable Goal	Report Section	Year / Schedule					
						1	2	3	4	5	6
						7/1/18-7/1/19	7/1/19-7/1/20	7/1/20-7/1/21	7/1/21-7/1/22	7/1/22-7/1/23	7/1/23-7/1/24
2. Public Participation and Involvement											
2-1	Make SWMP Publicly Available	1. Post SWMP Plan on Town website, along with contact name, email address and/or phone number of a contact person at the Town to contact for information or submit comments.	Information Technology, Highway Department	Annual review of stormwater management plan and posting on website. Allow public to comment on the plan at least annually	4.4.1	*	*	*	*	*	*
2-2	Shoreline and Waterbody Cleanups	2. Sponsor watershed cleanup events at least once per year, usually in conjunction with Earth Day and focusing on Town ponds, lakes, and streams.	Conservation Commission, Highway Department	Allow annual participation in stream and pond cleanup events in conjunction with Earth Day	4.4.2	*	*	*	*	*	*



Table 11-1. Proposed BMP Plan - Implementation of Phase II Activities											
BMP ID	BMP Description	Implementation	Responsible Dept./Person	Measurable Goal	Report Section	Year / Schedule					
						1	2	3	4	5	6
						7/1/18-7/1/19	7/1/19-7/1/20	7/1/20-7/1/21	7/1/21-7/1/22	7/1/22-7/1/23	7/1/23-7/1/24
3. Illicit Discharge Detection and Elimination											
3-1	Review, Update as Necessary, and Enforce IDDE Bylaw	1. Enact and enforce IDDE bylaw	Highway Department, Board of Health	Complete within 1 year of the effective date of permit	5.4.1	*					
3-2	Phase I Storm Sewer System Map	1. Delineate catchment areas based on topography for each MS4 outfall and map in GIS.	Highway Department	Updated map within 2 years of effective date of permit	5.4.2	*					
		2. Update outfalls, conveyances receiving waters, interconnections, MS4-owned BMPs & initial catchment delineations.				*	*				
3-3	Phase II Storm Sewer System Map	1. Update outfall spatial location, pipes, manholes, catch basins, refined catchment delineations as new information becomes available.	Highway Department	Updated map within 10 years of effective date of permit	5.4.2	*	*	*	*	*	*
3-4	Complete SSO Inventory	1. Complete an inventory of Sanitary Sewer Overflows (SSOs) that have discharged to the MS4 within the previous 5 years and update annually.	Highway Department, Board of Health	Develop SSO inventory and complete within 1 year of effective date of permit and update annually	5.4.3	*	*	*	*	*	*
3-5	Written IDDE Program	1. Prepare written IDDE Plan to include procedures on assessing and priority ranking outfalls and interconnections, dry and wet weather outfall sampling, catchment investigations, system vulnerability factor assessment, identification of an illicit discharge, illicit discharge removal, and ongoing screening requirements.	Highway Department	Complete within 1 year of the effective date of permit and update as required	5.4.4	*					
3-6	Outfall / Interconnection Inventory and Ranking	1. Develop an outfall and interconnection inventory that identifies each outfall and interconnection discharging from the MS4, records its location and condition and provides a framework for tracking inspections, screenings and other activities under the IDDE program.	Highway Department, Board of Health	Identification of outfalls and initial ranking by July 1, 2019	5.4.4	*					
		2. Classify/rank outfalls. Initial ranking by end of Year 1. Update ranking annually with new information.				*	*	*	*	*	*
3-7	Implement IDDE Program	1. Inspect key catchment structures (manholes, catch basins) during dry weather conditions. Where flowing water is observed, collect samples for analysis.	Highway Department, Board of Health	Implement catchment investigations according to program and permit conditions (Problem Outfalls by July 1, 2025, all outfalls by July 1, 2028)	5.4.4		*	*	*	*	*
		2. Inspect key catchment structures (manholes, catch basins) in all catchments during dry weather conditions. Where flowing water is observed, collect samples for analysis.					*	*	*	*	*
3-8	Dry Weather Screening	1. Inspect drainage outfalls classified as High or Low priority during dry weather.	Highway Department	Complete in accordance with outfall screening procedure and permit conditions by July 1, 2021	5.4.5	*	*	*			
		2. Investigate potential illicit discharges, if any.				*	*	*	*	*	*
		3. Enforce removal of illicit discharges, if any.				*	*	*	*	*	*
3-9	Wet Weather Screening	1. Sample select outfalls with System Vulnerability Factors under wet weather conditions. Sampling can be done upon completion of any dry weather investigation, but must be completed before catchment investigation is marked as complete.	Highway Department	Complete in accordance with outfall screening procedure within 10 years of the effective permit date	5.4.5						*
3-10	Ongoing Screening	1. Upon completion of catchment investigations, reprioritize outfalls for ongoing screening.	Highway Department	Conduct ongoing dry and wet weather outfall screening upon completion of the IDDE program	5.4.5						*
		2. Continue performing dry and wet weather sampling according to the new prioritization at least once every 5 years.									*
3-11	Perform IDDE Training	1. Provide annual training to employees involved in the IDDE program.	Highway Department, Board of Health	Train applicable employees annually	5.4.6	*	*	*	*	*	*

Table 11-1. Proposed BMP Plan - Implementation of Phase II Activities											
BMP ID	BMP Description	Implementation	Responsible Dept./Person	Measurable Goal	Report Section	Year / Schedule					
						1	2	3	4	5	6
						7/1/18-7/1/19	7/1/19-7/1/20	7/1/20-7/1/21	7/1/21-7/1/22	7/1/22-7/1/23	7/1/23-7/1/24
4. Construction Site Stormwater Runoff Control											
4-1	Review, Update as Necessary, and Enforce Construction Bylaw	1. Review and update existing Stormwater Management bylaw as necessary for permit compliance.	Planning Board, Conservation Commission, Building / Zoning Department, Zoning Board	Complete bylaw updates within 1 year of the effective date of the permit	6.4.1	*					
4-2	Develop Written Procedures for Site Plan Review	1. Review and update existing requirements mandating site plan review and make changes as needed, such as incorporating additional information submitted by the public.	Planning Board, Conservation Commission, Building / Zoning Department, Zoning Board	Establish procedures for site plan review within 1 year of the effective date of the permit	6.4.2	*					
4-3	Develop Written Procedures for Site Inspections and Enforcement	1. Review and update existing requirements mandating site inspections, enforcement, and requirements for submittal of monthly inspection reports as needed	Planning Board, Conservation Commission, Building / Zoning Department, Zoning Board	Establish procedures for site inspections and enforcement within 1 year of the effective date of the permit	6.4.3	*					
4-4	Establish a Sediment and Erosion Control Program	1. Review existing requirements for development of an Erosion and Sediment Control Plan to determine if it meets all permit requirements and make changes as needed	Planning Board, Conservation Commission, Building / Zoning Department, Zoning Board	Establish procedures for development of an erosion and sediment control program within 1 year of the effective date of the permit	6.4.4	*					
4-5	Develop Procedures for Waste Control	1. Establish requirements to control construction site wastes within 1 year of the effective date of the permit	Planning Board, Conservation Commission, Building / Zoning Department, Zoning Board	Establish requirements to control construction site wastes within 1 year of the effective date of the permit	6.4.4	*					

Table 11-1. Proposed BMP Plan - Implementation of Phase II Activities											
BMP ID	BMP Description	Implementation	Responsible Dept./Person	Measurable Goal	Report Section	Year / Schedule					
						1	2	3	4	5	6
						7/1/18-7/1/19	7/1/19-7/1/20	7/1/20-7/1/21	7/1/21-7/1/22	7/1/22-7/1/23	7/1/23-7/1/24
5. Stormwater Management in New Development and Redevelopment											
5-1	Develop and Enforce Post-Construction Bylaw	1. Enact and enforce Post-Construction Bylaw.	Planning Board, Conservation Commission, Building / Zoning Department, Zoning Board	Complete bylaw updates within 2 years of the effective date of the permit	7.4.1	*	*				
5-2	Require Stormwater As-Built Plan Submittal	1. Require submittal of as-built drawings as part of the new Post-Construction Bylaw.	Planning Board, Conservation Commission, Building / Zoning Department	Require submittal of as-built plans for completed projects within 2 years of completion	7.4.2	*	*				
5-3	Require Long Term Operation and Maintenance	1. Review existing Stormwater Management for Discharges to Municipal Stormwater System bylaw and make changes as necessary to require long term operation and maintenance, such as addressing funding sources.	Planning Board, Conservation Commission, Building / Zoning Department	Require submittal of operation and maintenance plans to ensure long term maintenance within 1 year of the effective date of the permit	7.4.3	*	*				
5-4	Street Design and Parking Lot Guidelines	1. Review existing by-laws, regulations and guidance pertaining to current street and parking lot design and all regulations for ability to incorporate LID into designs.	Planning Board, Conservation Commission, Building / Zoning Department, Zoning Board	Complete regulatory updates within 4 years of the effective date of the permit	7.4.4		*	*			
		2. Prepare a report assessing whether existing street and parking lot design regulations allow for incorporation of LID practices and recommendations for changes.						*			
5-5	Allow Green Infrastructure	1. Review existing by-laws, regulations and guidance to determine the feasibility of making green practices allowable.	Planning Board, Conservation Commission, Building / Zoning Department, Zoning Board	Complete regulatory updates within 4 years of the effective date of the permit	7.4.4		*	*			
		2. Prepare a report assessing existing local regulations to determine the feasibility of allowing green roofs, infiltration practices, and water harvesting devices.						*			
5-6	Target Properties to Reduce Impervious Area	1. Identify 5 properties for potential retrofits to stormwater impacts, as well as nitrogen impacts to Cape Cod.	Planning Board, Conservation Commission, Building / Zoning Department, Highway Department	Complete inventory within 4 years of the effective date of the permit and update annually on retrofitted properties	7.4.5				*		
		2. Track and report annually properties that have been modified or retrofitted with BMPs.						*	*	*	

Table 11-1. Proposed BMP Plan - Implementation of Phase II Activities											
BMP ID	BMP Description	Implementation	Responsible Dept./Person	Measurable Goal	Report Section	Year / Schedule					
						1	2	3	4	5	6
						7/1/18-7/1/19	7/1/19-7/1/20	7/1/20-7/1/21	7/1/21-7/1/22	7/1/22-7/1/23	7/1/23-7/1/24
6. Good Housekeeping and Pollution Prevention											
6-1	Inventory Open Spaces, Buildings and Facilities, and Vehicles and Equipment	1. Inventory all permittee-owned parks and open spaces, building and facilities (including storm drains), and vehicles and equipment in the regulated area.	Highway Department, Recreation Department	Complete inventory of open spaces, buildings and facilities, and vehicles and equipment within 2 years of the effective date of the permit	8.3.1		*				
6-2	Establish Operation and Maintenance Procedures	1. Evaluate practices at MS4 properties (parks and open spaces, building and facilities, vehicles and equipment) and develop written Facilities O&M Plan.	Highway Department, Recreation Department	Create written O&M Plan for open spaces, buildings and facilities, and vehicles and equipment within 2 years of the effective date of the permit	8.3.1		*				
		2. Distribute written O&M/SOPs as part of employee training.					*				
		3. Update inventory annually					*	*	*	*	*
6-3	Review Infrastructure O&M Procedures	1. Develop written O&M procedures or SOPs for the storm drain system, roadways and existing Town-owned BMPs (e.g., catch basin cleaning, street sweeping, winter road maintenance, stormwater BMPs).	Highway Department	Written SOPs.	8.3.2		*				
		2. Distribute written O&M/SOPs as part of employee training.					*				
6-4	Catch Basin Cleaning	1. Establish a cleaning schedule and maintain catch basins so that they remain less than 50% full of sediment.	Highway Department	Clean catch basins on established schedule and report number of catch basins cleaned and volume of material moved annually	8.3.2	As Needed					
		2. Properly manage storage of catch basin residuals.				*	*	*	*	*	*
6-5	Street Sweeping	1. Sweep streets once a year in spring and twice a year where drainage is to nitrogen impaired water.	Highway Department	Sweep all streets and parking lots at least annually and sweep all streets within the Long Island Sound watershed twice per year.	8.3.2	*	*	*	*	*	*
		2. Properly manage storage of street sweeping residuals.									
6-6	Road Salt Optimization Program	1. Establish and implement procedures for proper winter road maintenance, including use and storage of salt and sand, and procedures to minimize the use of road salt.	Highway Department	Implement salt use optimization during winter maintenance operations	8.3.2	*					
6-7	Assess Regulated Facilities to Determine SWPPP Eligibility	1. Evaluate the need for SWPPPs for municipal maintenance garages, public works yards, transfer stations, and other waste handling facilities where pollutants are exposed to stormwater. Complete SWPPP or document No Exposure as applicable.	Highway Department	Document whether a SWPPP is needed and where required, prepare SWPPP by July 1, 2020.	8.3.3		*				
6-8	Develop SWPPPs for Applicable Facilities	1. Complete SWPPP or document No Exposure as applicable.	Highway Department	Prepare SWPPP if needed by July 1, 2020.	8.3.3		*				
6-9	Establish BMP O&M Procedures	1. Establish written inspection and maintenance procedures and frequencies for inspection of all structural stormwater BMPs.	Highway Department	Create written O&M Plan for stormwater BMPs within 2 years of the effective date of the permit	8.3.4		*				
6-10	Inspect and Maintain Stormwater BMPs	1. Annually inspect MS4-owned stormwater treatment BMPs. Document inspections and maintenance performed.	Highway Department	Inspect and maintain treatment structures annually	8.3.4		*	*	*	*	*
6-11	Good Housekeeping Training	1. Perform training on IDDE program, spill response, good housekeeping, etc.	Highway Department	Train staff on good housekeeping procedures annually	8.3.5	*	*	*	*	*	*

Table 11-1. Proposed BMP Plan - Implementation of Phase II Activities												
BMP ID	BMP Description	Implementation	Responsible Dept./Person	Measurable Goal	Report Section	Year / Schedule						
						1	2	3	4	5	6	
						7/1/18-7/1/19	7/1/19-7/1/20	7/1/20-7/1/21	7/1/21-7/1/22	7/1/22-7/1/23	7/1/23-7/1/24	
7. TMDL and Impaired Waters Controls												
7-1	Discharges to Approved TMDL Waterbodies - Nitrogen (Long Island Sound)	1. Enhanced BMPs - Public Education. Include annual message in the spring (April/May) timeframe that encourages the proper use and disposal of grass clippings and encourages the proper use of slow-release fertilizer; an annual message in the summer (June/July) timeframe encouraging the proper management of pet waste; and an annual message in the Fall (August/September/October) timeframe encouraging the proper disposal of leaf litter.	Highway Department, Conservation Commission, Planning Board	Distribute materials with Residential education program.	9.2.1	*	*	*	*	*	*	
		2. Enhanced BMPs - Stormwater Management in New Development and Redevelopment. Include a requirement in the regulatory mechanism that new development and redevelopment stormwater management BMPs be optimized for nitrogen removal.		Complete bylaw updates within 2 years of the effective date of the permit		*	*					
		3. Enhanced BMPs - Consider BMPs to reduce nitrogen discharges when identifying MS4 properties for retrofits.		Evaluate stormwater BMPs for nitrogen removal during facility inventory within 2 years of the effective date of the permit					*	*	*	
		4. Enhanced BMPs - Good Housekeeping and Pollution Prevention. Incorporate nitrogen reduction practices into Town good housekeeping practices such as fertilizer use and managing grass cuttings and leaf litter.		Create written O&M Plan for open spaces, buildings and facilities, and vehicles and equipment within 2 years of the effective date of the permit		*	*	*	*	*	*	
		5. Enhanced BMPs - Good Housekeeping and Pollution Prevention. Increase street sweeping to twice per year (spring and fall) for all catchment areas		Sweep all streets and parking lots within the Long Island Sound watershed twice per year.		*	*	*	*	*	*	
		6. Nitrogen Source Identification Report - Prepare a Nitrogen Source Identification Report to locate and reduce nitrogen loadings within the Town's MS4.		Complete report within 4 years of the effective date of permit.	9.2.2					*	*	
		7. Evaluate municipal properties for potential BMPs to construct one that will treat nitrogen, determine estimated costs, and determines engineering and regulatory feasibility.		Evaluate municipal facilities within5 years of the effective date of the permit to determine candidates for a nitrogen BMP.		9.2.3					*	*
		8. Design and construct at least one BMP as a public demonstration project.		Installed BMP within 6 years of the effective date of the permit.						*	*	
		9. Track BMPs installed, including type, location, total area treated, design storage volume and estimated phosphorus removal and report annually.		Summary progress table.							*	

Table 11-1. Proposed BMP Plan - Implementation of Phase II Activities												
BMP ID	BMP Description	Implementation	Responsible Dept./Person	Measurable Goal	Report Section	Year / Schedule						
						1	2	3	4	5	6	
						7/1/18-7/1/19	7/1/19-7/1/20	7/1/20-7/1/21	7/1/21-7/1/22	7/1/22-7/1/23	7/1/23-7/1/24	
7 (continued). TMDL and Impaired Waters Controls												
7-2	Discharges to Water Quality Limited Waterbodies - Phosphorus (Blackstone River)	1. Enhanced BMPs - Public Education. Include fertilizer use, disposal of grass clippings and leaf litter, and pet waste management with the Residential and Commercial public education programs.	Highway Department, Conservation Commission, Planning Board	Distribute materials with Residential education program.	9.3.1	*	*	*	*	*	*	
		2. Enhanced BMPs - Stormwater Management in New Development and Redevelopment. Include a requirement in the regulatory mechanism that new development and redevelopment stormwater management BMPs be optimized for phosphorus removal.		Complete bylaw updates within 2 years of the effective date of the permit.					*	*	*	
		3. Enhanced BMPs - Consider BMPs to reduce phosphorus discharges when identifying MS4 properties for retrofits.		Evaluate stormwater BMPs for phosphorus removal during facility inventory within 2 years of the effective date of the permit.								
		4. Enhanced BMPs - Good Housekeeping and Pollution Prevention. Incorporate phosphorus reduction practices into Town good housekeeping practices such as fertilizer use and managing grass cuttings and leaf litter.		Create written O&M Plan for open spaces, buildings and facilities, and vehicles and equipment within 2 years of the effective date of the permit		*	*	*	*	*	*	
		6. Enhanced BMPs - Good Housekeeping and Pollution Prevention. Increase street sweeping to twice per year (spring and fall) for all catchment areas, with additional sweeping in areas with potential for high pollutant loads.		Sweep all streets and parking lots within phosphorus-impaired waterbody watersheds twice per year.		*	*	*	*	*	*	
		7. Phosphorus Source Identification Report - Prepare a Phosphorus Source Identification Report to locate and reduce phosphorus loadings within the Town's MS4.		Complete report within 4 years of the effective date of permit.	9.3.2					*	*	
		8. Evaluate municipal properties for potential BMPs to construct one that will treat nitrogen, determine estimated costs, and determines engineering and regulatory feasibility.		Evaluate municipal facilities within 5 years of the effective date of the permit to determine candidates for a nitrogen BMP.		9.3.3					*	*
		9. Design and construct at least one BMP as a public demonstration project.		Installed BMP within 6 years of the effective date of the permit.							*	*
		10. Track BMPs installed, including type, location, total area treated, design storage volume and estimated phosphorus removal and report annually.		Summary progress table.								*
		7-3		Discharges to Water Quality Limited Waterbodies - Bacteria (Blackstone River)	1. Enhanced BMPs - Public Education. Include management of pet waste and septic system maintenance with the Residential public education program.	Highway Department, Conservation Commission, Planning Board	Distribute materials with Residential education program.	9.4.1	*	*	*	*
2. Enhanced BMPs - Illicit Discharge, Detection, and Elimination. Designate catchment draining to bacteria/pathogen impaired segments as "Problem Catchments" or "High" priority catchments in IDDE ranking.	Complete initial ranking within 1 year of the effective date of the permit		*									
7-4	Discharges to Water Quality Limited Waterbodies - Turbidity (Blackstone River, Mumford River, Number 1 Pond, Sutton Falls)	1. Enhanced BMPs - Stormwater Management in New Development and Redevelopment. Mandate that designs of stormwater systems on commercial and industrial land uses allow for spill containment.	Highway Department, Conservation Commission, Planning Board	Adopt new design guidelines for commercial and industrial construction.	9.5.1		*	*	*			
		2. Enhanced BMPs - Good Housekeeping and Pollution Prevention. Increase street sweeping for areas with higher pollutant loads.		Increase street sweeping if needed.			*	*	*	*	*	*
		3. Enhanced BMPs - Good Housekeeping and Pollution Prevention. Increase catch basin cleaning if inspections indicate that more frequent cleaning is necessary.		Increase catch basin cleaning if needed.			*	*	*	*	*	*



AUBURN

GRAFTON

MILLBURY

OXFORD

NORTHBRIDGE

UXBRIDGE

### Legend

- Urbanized Area
- Lake, Pond, Reservoir
- Wetland
- Stream, Brook
- Town Boundaries

0.5 0 0.5 1 1.5 2  
Miles

## Figure 1-1

### Urbanized Area

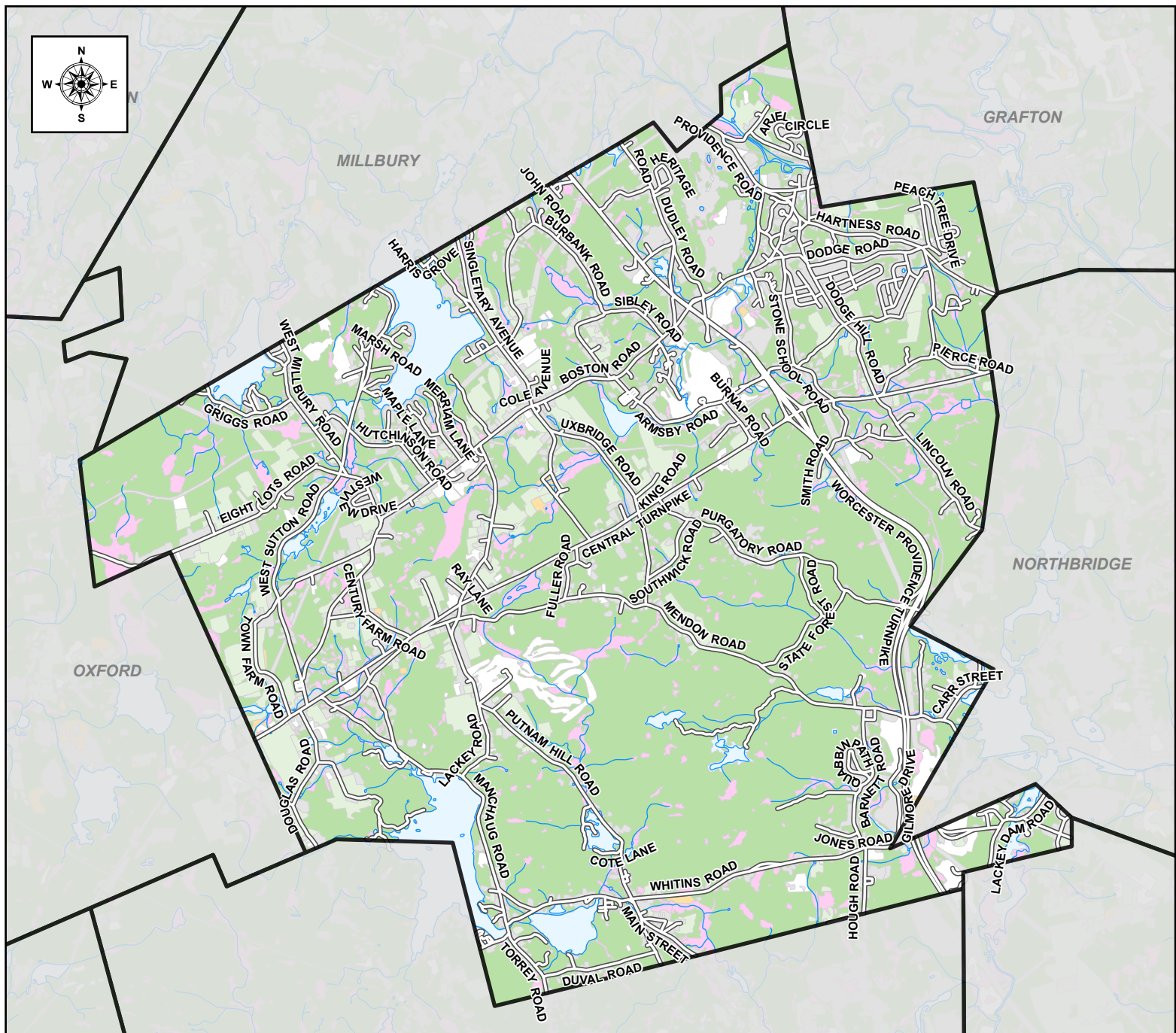
Sutton, MA



Comprehensive  
Environmental  
Incorporated

Data Source: MassGIS, Town of Sutton





### Legend

#### Land Use:

- Residential / Commercial / Industrial
- Agriculture
- Forest
- Water
- Wetland
- Disturbed Land
- Other Cleared Land
- Stream, Brook

0 0.5 1 1.5 2 2.5  
Miles

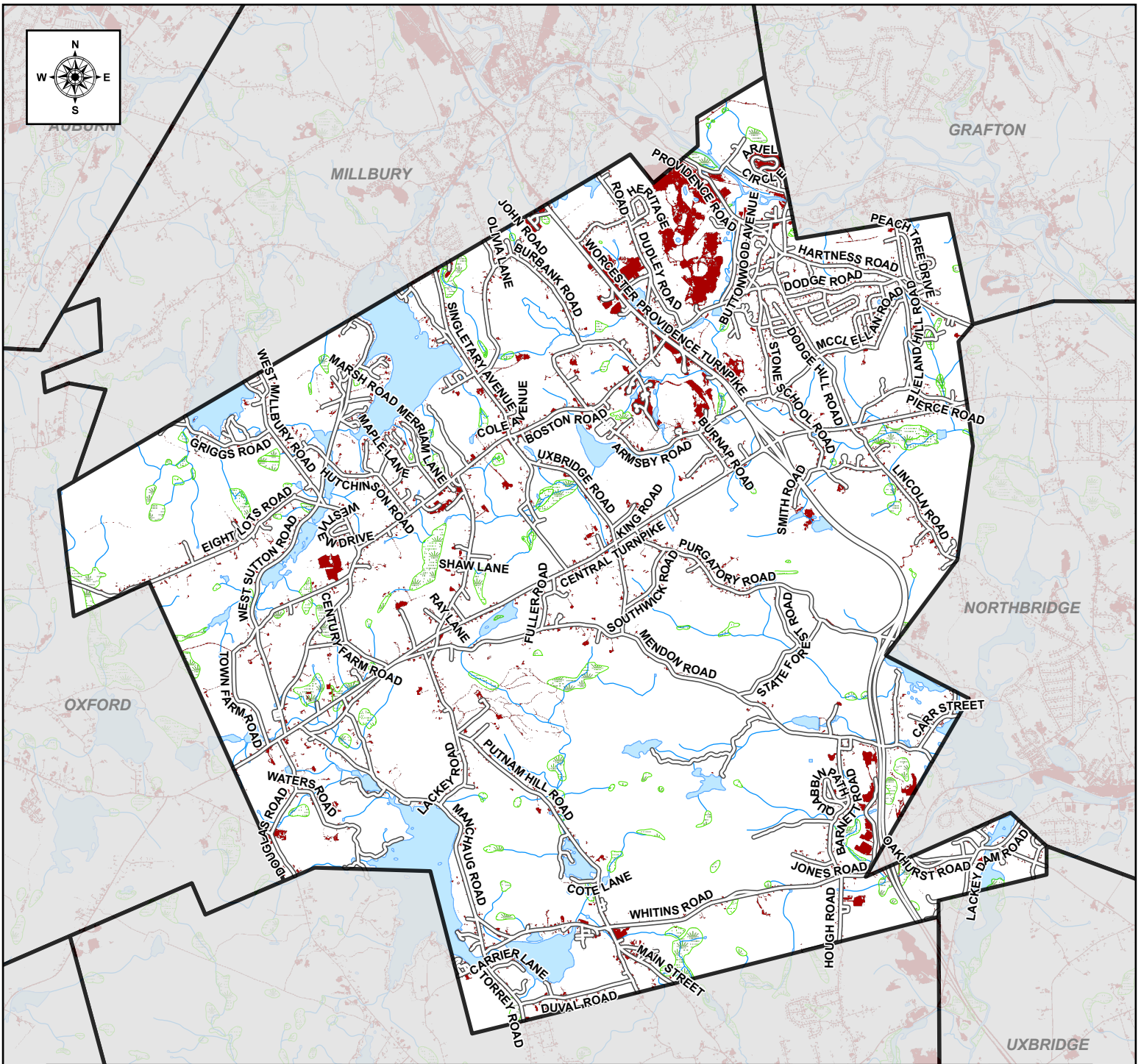
## Figure 2-1 Land Use Characteristics Sutton, MA



**Comprehensive  
Environmental  
Incorporated**

Data Source: MassGIS, Town of Sutton

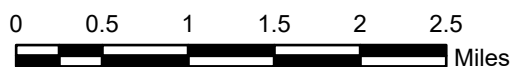




**Figure 2-2**  
**Impervious Area**  
**Sutton, MA**

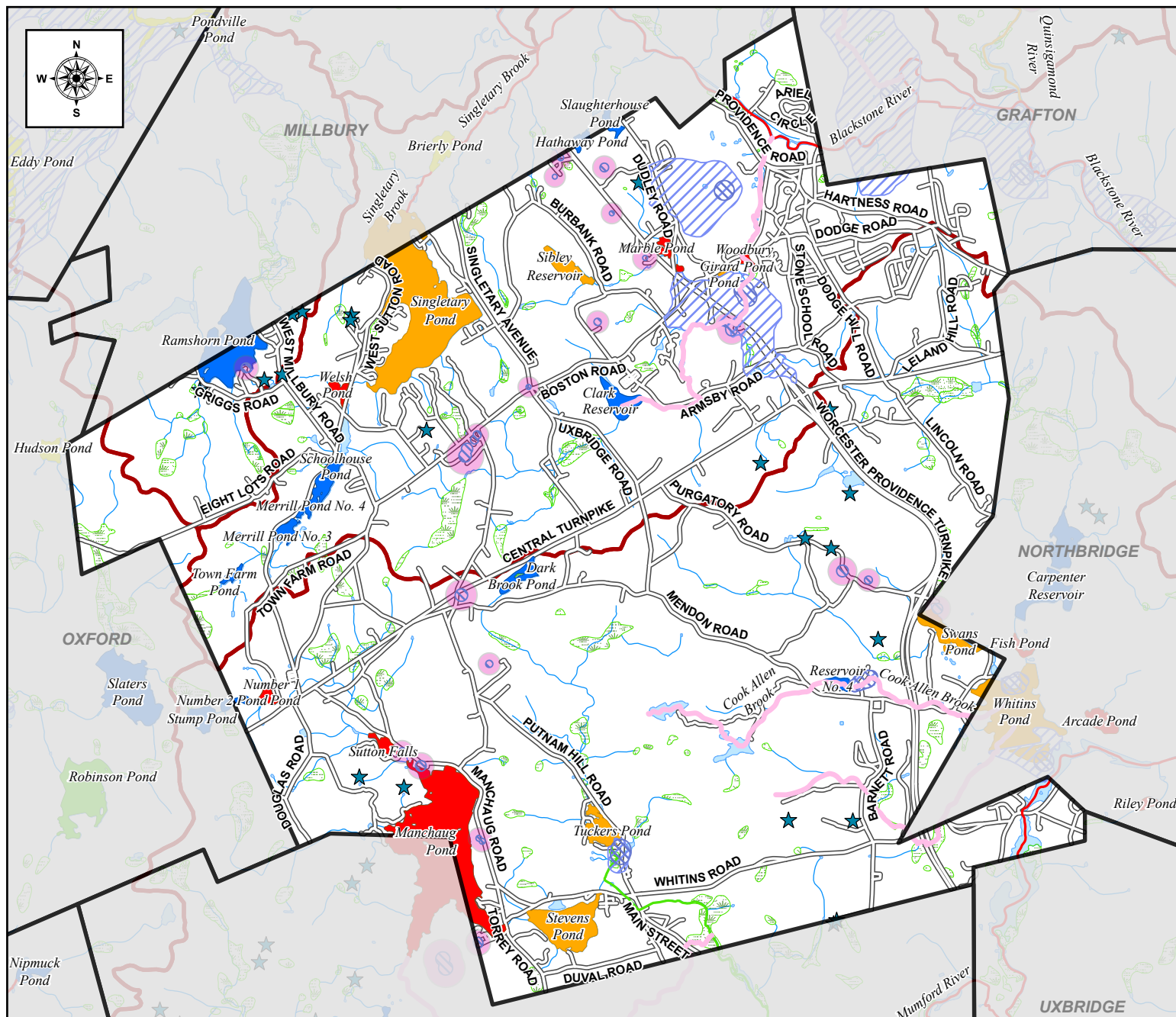
**Legend**

- Impervious Surface
- Town Boundaries
- Lake, Pond, Reservoir
- Wetland
- Stream, Brook



**Comprehensive  
 Environmental  
 Incorporated**

Data Source: MassGIS, Town of Sutton



### Legend

- ★ Certified Vernal Pool
- MA DFW Coldwater Fisheries
- MassDEP IWPA
- MassDEP Zone I
- MassDEP Zone II
- MassDEP 303(d) Waters:
  - Category 2
  - Category 4C
  - Category 5
- Category 2
- Category 3
- Category 4A
- Category 4C
- Category 5
- Lake, Pond
- Wetland
- Stream, Brook
- Watersheds

0 0.5 1 1.5 2 2.5 Miles

**Figure 2-3**

## Resource Waters

**Sutton, MA**



**Comprehensive  
Environmental  
Incorporated**

Data Source: MassGIS, Town of Sutton

## Appendix A

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### Notice of Intent and Authorization to Discharge



# Notice of Intent (NOI) for coverage under Small MS4 General Permit

Page 1 of 21

## Part I: General Conditions

### General Information

Name of Municipality or Organization: Town of Sutton

State: MA

EPA NPDES Permit Number (if applicable): MAR 041241



### Primary MS4 Program Manager Contact Information

Name: Matt Stencil

Title: Highway Superintendent

Street Address Line 1: 4 Uxbridge Rd

Street Address Line 2:

City: Sutton

State: MA

Zip Code: 01590

Email: mstencil@town.sutton.ma.us

Phone Number: (508) 865-8743

Fax Number:

### Other Information

Stormwater Management Program (SWMP) Location  
(web address or physical location, if already completed):

### Eligibility Determination

Endangered Species Act (ESA) Determination Complete? Yes

Eligibility Criteria  
(check all that apply): ☐ A ☐ B ☒ C

National Historic Preservation Act (NHPA) Determination Complete? Yes

Eligibility Criteria  
(check all that apply): ☒ A ☐ B ☐ C

☒ Check the box if your municipality or organization was covered under the 2003 MS4 General Permit

### MS4 Infrastructure (if covered under the 2003 permit)

Estimated Percent of Outfall Map Complete?  
(Part II, III, IV or V, Subpart B.3.(a.) of 2003 permit)

90%

If 100% of 2003 requirements not met, enter an  
estimated date of completion (MM/DD/YY):

06/30/20

Web address where MS4 map is published:

*If outfall map is unavailable on the internet an electronic  
or paper copy of the outfall map must be included with  
NOI submission (see section V for submission options)*

### Regulatory Authorities (if covered under the 2003 permit)

Illicit Discharge Detection and Elimination (IDDE) Authority Adopted?  
(Part II, III, IV or V, Subpart B.3.(b.) of 2003 permit)

Yes

Effective Date or Estimated  
Date of Adoption (MM/DD/YY):

05/11/09

Construction/Erosion and Sediment Control (ESC) Authority Adopted?  
(Part II, III, IV or V, Subpart B.4.(a.) of 2003 permit)

No

Effective Date or Estimated  
Date of Adoption (MM/DD/YY):

06/30/19

Post- Construction Stormwater Management Adopted?  
(Part II, III, IV or V, Subpart B.5.(a.) of 2003 permit)

No

Effective Date or Estimated  
Date of Adoption (MM/DD/YY):

06/30/20

## Part II: Summary of Receiving Waters

Massachusetts list of impaired waters: Massachusetts 2014 List of Impaired Waters- <http://www.mass.gov/eea/docs/dep/water/resources/07v5/14list2.pdf>

[illegible]



Waterbody segment that receives flow from the MS4	Number of outfalls into receiving water segment	Chloride	Chlorophyll-a	Dissolved Oxygen/ DO Saturation	Nitrogen	Oil & Grease/ PAH	Phosphorus	Solids/ TSS/ Turbidity	E. coli	Enterococcus	Other pollutant(s) causing impairments
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## Notice of Intent (NOI) for coverage under Small MS4 General Permit

### Part III: Stormwater Management Program Summary

Identify the Best Management Practices (BMPs) that will be employed to address each of the six Minimum Control Measures (MCMs). For municipalities/organizations whose MS4 discharges into a receiving water with an approved Total Maximum Daily Load (TMDL) and an applicable waste load allocation (WLA), identify any additional BMPs employed to specifically support the achievement of the WLA in the TMDL section at the end of part III.

For each MCM, list each existing or proposed BMP by category and provide a brief description, responsible parties/departments, measurable goals, and the year the BMP will be employed (public education and outreach BMPs also requires a target audience). **Use the drop-down menus in each table or enter your own text to override the drop down menu.**

#### MCM 1: Public Education and Outreach

BMP Media/Category (enter your own text to override the drop down menu)	BMP Description	Targeted Audience	Responsible Department/Parties (enter your own text to override the drop down menu)	Measurable Goal	Beginning Year of BMP Implementation
Brochures/Pamphlets	Distribute fact sheets or brochures on pet waste pickup with dog licenses.	Residents	Town Clerk	Provide informational flyers with all applications and renewals.	2018
Brochures/Pamphlets	Make fact sheets available to residents with relevant information	Residents	Highway Department	Make informational flyers available to residents at several town-owned buildings.	2018
Brochures/Pamphlets	Distribute fact sheets or brochures on erosion and sediment control with permit applications	Developers (construction)	Planning Board, Conservation Commission, Building / Zoning Department	Provide information with all applications	2018
Web Page	Provide web information on septic system maintenance, illicit discharges, pet waste disposal, lawn care, pesticide and fertilizer use, grass clippings and leaf litter disposal, car washing, and use of environmentally friendly products.	Residents	Information Technology, Highway Department	Continue to update and maintain the websites.	2018



## Town of Sutton

Web Page	Provide web information on pesticide and fertilizer use, grass clippings and leaf litter disposal, building maintenance, salt usage, storage of materials and wastes, car washing, benefits of infiltration, and use of environmentally friendly products.	Businesses, Institutions, and Commerce	Information Technology, Highway Department	Continue to update and maintain the websites.	2018
Web Page	Provide web information on erosion and sediment control, Low Impact Development, and the NPDES Construction General Permit.	Developers (construction)	Information Technology, Highway Department	Continue to update and maintain the websites.	2018
Web Page	Provide web information on equipment maintenance and inspection, material storage, solid waste handling, salt usage, benefits of onsite infiltration, management of parking lot surfaces, and EPA's MSGP.	Industrial	Information Technology, Highway Department	Continue to update and maintain the websites.	2018
Social Media	Provide relevant stormwater information to different audiences via social media.	Residents, Businesses, Institutions, Commercial Facilities, Developers (construction), Industrial	Information Technology	Follow statewide "Think Blue" campaign on social media platforms.	2019

[illegible]

### Part III: Stormwater Management Program Summary (continued)

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## Notice of Intent (NOI) for coverage under Small MS4 General Permit

### Part III: Stormwater Management Program Summary (continued)

#### MCM 3: Illicit Discharge Detection and Elimination (IDDE)

BMP Categorization (enter your own text to override the drop down menu)	BMP Description	Responsible Department/Parties (enter your own text to override the drop down menu)	Measurable Goal (all text can be overwritten)	Beginning Year of BMP Implementation
SSO inventory	Develop SSO inventory in accordance of permit conditions	Highway Department, Board of Health	Complete within 1 year of effective date of permit	2018
Storm sewer system map	Create map and update during IDDE program completion	Highway Department	Update map within 2 years of effective date of permit and complete full system map 10 years after effective date of permit	2018
Written IDDE program	Create written IDDE program	Highway Department	Complete within 1 year of the effective date of permit and update as required	2018
Implement IDDE program	Implement catchment investigations according to program and permit conditions	Highway Department, Board of Health	Complete 10 years after effective date of permit	2020
Employee training	Train employees on IDDE implementation	Highway Department, Board of Health	Train annually	2018
Conduct dry weather screening	Conduct in accordance with outfall screening procedure and permit conditions	Highway Department	Complete 3 years after effective date of permit	2019
Conduct wet weather screening	Conduct in accordance with outfall screening procedure	Highway Department	Complete 10 years after effective date of permit	2024
Ongoing screening	Conduct dry weather and wet weather screening (as necessary)	Highway Department	Complete ongoing outfall screening upon completion of IDDE program	2024
IDDE Ordinance/Bylaw	Enforce existing IDDE bylaw	Highway Department, Board of Health	Continue to enforce IDDE bylaw, created May 11, 2009	2018

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## Notice of Intent (NOI) for coverage under Small MS4 General Permit

### Part III: Stormwater Management Program Summary (continued)

#### MCM 4: Construction Site Stormwater Runoff Control

<b>BMP Categorization</b> (enter your own text to override the drop down menu or entered text)	<b>BMP Description</b>	<b>Responsible Department/Parties</b> (enter your own text to override the drop down menu)	<b>Measurable Goal</b> (all text can be overwritten)	<b>Beginning Year of BMP Implementation</b>
Site inspection and enforcement of Erosion and Sediment Control (ESC) measures	Complete written procedures of site inspections and enforcement procedures	Planning Board, Conservation Commission, Building / Zoning Department, Zoning	Complete within 1 year of the effective date of permit	2018
Site plan review	Complete written procedures of site plan review and begin implementation	Planning Board, Conservation Commission, Building / Zoning Department, Zoning	Complete within 1 year of the effective date of permit	2018
Erosion and Sediment Control	Adoption of requirements for construction operators to implement a sediment and erosion control program	Planning Board, Conservation Commission, Building / Zoning Department, Zoning	Complete within 1 year of the effective date of permit	2018
Waste Control	Adoption of requirements to control wastes, including but not limited to, discarded building materials, concrete truck wash out, chemicals, litter, and sanitary wastes	Planning Board, Conservation Commission, Building / Zoning Department, Zoning	Complete within 1 year of the effective date of permit	2018

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## Notice of Intent (NOI) for coverage under Small MS4 General Permit

### Part III: Stormwater Management Program Summary (continued)

#### MCM 5: Post-Construction Stormwater Management in New Development and Redevelopment

<b>BMP Categorization</b> (enter your own text to override the drop down menu or entered text)	<b>BMP Description</b>	<b>Responsible Department/Parties</b> (enter your own text to override the drop down menu)	<b>Measurable Goal</b> (all text can be overwritten)	<b>Beginning Year of BMP Implementation</b>
As-built plans for on-site stormwater control	The procedures to require submission of as-built drawings and ensure long term operation and maintenance will be a part of the SWMP	Planning Board, Conservation Commission, Building / Zoning Department	Require submission of as-built plans for completed projects	2018
Target properties to reduce impervious areas	Identify at least 5 permittee-owned properties that could be modified or retrofitted with BMPs to reduce impervious areas and update annually	Planning Board, Conservation Commission, Building / Zoning Department, Highway	Complete 4 years after effective date of permit and report annually on retrofitted properties	2020
Allow green infrastructure	Develop a report assessing existing local regulations to determine the feasibility of making green infrastructure practices allowable when appropriate site conditions exist	Planning Board, Conservation Commission, Building / Zoning Department, Zoning	Complete 4 years after effective date of permit and implement recommendations of report	2020
Street design and parking lot guidelines	Develop a report assessing requirements that affect the creation of impervious cover. The assessment will help determine if changes to design standards for streets and parking lots can be modified to support low impact design options.	Planning Board, Conservation Commission, Building / Zoning Department, Zoning	Complete 4 years after effective date of permit and implement recommendations of report	2020

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## Notice of Intent (NOI) for coverage under Small MS4 General Permit

### Part III: Stormwater Management Program Summary *(continued)*

#### MCM 6: Municipal Good Housekeeping and Pollution Prevention

<b>BMP Categorization</b> (enter your own text to override the drop down menu or entered text)	<b>BMP Description</b>	<b>Responsible Department/Parties</b> (enter your own text to override the drop down menu)	<b>Measurable Goal</b> (all text can be overwritten)	<b>Beginning Year of BMP Implementation</b>
O&M procedures	Create written O&M procedures including all requirements contained in 2.3.7.a.ii for parks and open spaces, buildings and facilities, and vehicles and equipment	Highway Department, Recreation Department	Complete and implement 2 years after effective date of permit	2019
Inventory all permittee-owned parks and open spaces, buildings and facilities, and vehicles and equipment	Create inventory	Highway Department, Recreation Department	Complete 2 years after effective date of permit and implement annually	2019
Infrastructure O&M	Establish and implement program for repair and rehabilitation of MS4 infrastructure	Highway Department	Complete 2 years after effective date of permit	2019
Stormwater Pollution Prevention Plan (SWPPP)	Create SWPPPs for maintenance garages, transfer stations, and other waste-handling facilities	Highway Department	Complete and implement 2 years after effective date of permit	2019
Catch basin cleaning	Establish schedule for catch basin cleaning such that each catch basin is no more than 50% full and clean catch basins on that schedule	Highway Department	Clean catch basins on established schedule and report number of catch basins cleaned and volume of material moved annually	2018
Street sweeping program	Sweep all streets and permittee-owned parking lots in accordance with permit conditions	Highway Department	Sweep all streets and permittee-owned parking lots once per year in the spring	2018
Road salt use optimization program	Establish and implement a program to minimize the use of road salt	Highway Department	Implement salt use optimization during deicing season	2018



[illegible]

### Part III: Stormwater Management Program Summary (continued)

Use the drop-down menus to select the applicable TMDL, action description to meet the TMDL requirements, and the responsible department/parties. If no options are applicable, or more than one, **enter your own text to override drop-down menus.**

[illegible]

## Part III: Stormwater Management Program Summary (continued)

Use the drop-down menus to select the pollutant causing the water quality limitation and enter the waterbody ID(s) experiencing excursions above water quality standards for that pollutant. Choose the action description from the dropdown menu and indicate the responsible party. If no options are applicable, or more than one, **enter your own text to override drop-down menus.**

[illegible]



**Part IV: Notes and additional information**

Use the space below to indicate the part(s) of 2.2.1 and 2.2.2 that you have identified as not applicable to your MS4 because you do not discharge to the impaired water body or a tributary to an impaired water body due to nitrogen or phosphorus. Provide all supporting documentation below or attach additional documents if necessary. Also, provide any additional information about your MS4 program below.

The Town of Sutton obtained an official species list for threatened and endangered species via the IPaC system (Consultation Code: 05E1NE00-2018-SLI-0016) within the regulated urbanized area. Per the IPaC system, one species exists within the MS4 regulated area: the Northern Long-eared Bat (*Myotis septentrionalis*). Based on the habitat of this species, it is our opinion that the current stormwater discharges will have "no effect" on the listed species. As no construction is being conducted, there will be no disturbances to terrestrial habitats of the Long-eared Bat. Existing stormwater discharges will have no effect on these habitats, as they are to aquatic areas. If structural Best Management Practices (BMPs) not identified on the NOI are proposed for installation or construction during the course of the permit term, the Town of Sutton agrees to conduct endangered species screening for the proposed site and contact USFWS if it is determined that the new activity "may affect" or is "not likely to adversely affect" listed species or critical habitat under jurisdiction of the USFWS.

## Notice of Intent (NOI) for coverage under Small MS4 General Permit

Page 21 of 21

### Part V: 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.*

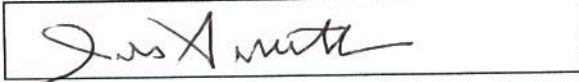
Name:

James Smith

Title:

Town Manager

Signature:



Date:

10/10/18

[To be signed according to Appendix B, Subparagraph B.11, Standard Conditions]

Note: When prompted during signing, save the document under a new file name





## United States Department of the Interior

FISH AND WILDLIFE SERVICE  
New England Ecological Services Field Office  
70 Commercial Street, Suite 300  
Concord, NH 03301-5094  
Phone: (603) 223-2541 Fax: (603) 223-0104  
<http://www.fws.gov/newengland>



In Reply Refer To:

October 03, 2017

Consultation Code: 05E1NE00-2018-SLI-0016

Event Code: 05E1NE00-2018-E-00035

Project Name: Sutton MA MS4

Subject: List of threatened and endangered species that may occur in your proposed project location, and/or may be affected by your proposed project

To Whom It May Concern:

The enclosed species list identifies threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitat, that may occur within the boundary of your proposed project and/or may be affected by your proposed project. The species list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 et seq.).

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Please feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the ECOS-IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the ECOS-IPaC system by completing the same process used to receive the enclosed list.

The purpose of the Act is to provide a means whereby threatened and endangered species and the ecosystems upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 et seq.), Federal agencies are required to utilize their authorities to carry out programs for the conservation of threatened and endangered species and to determine whether projects may affect threatened and endangered species and/or designated critical habitat.

A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the

human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2)(c)). For projects other than major construction activities, the Service suggests that a biological evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

If a Federal agency determines, based on the Biological Assessment or biological evaluation, that listed species and/or designated critical habitat may be affected by the proposed project, the agency is required to consult with the Service pursuant to 50 CFR 402. In addition, the Service recommends that candidate species, proposed species and proposed critical habitat be addressed within the consultation. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found in the "Endangered Species Consultation Handbook" at:

<http://www.fws.gov/endangered/esa-library/pdf/TOC-GLOS.PDF>

Please be aware that bald and golden eagles are protected under the Bald and Golden Eagle Protection Act (16 U.S.C. 668 et seq.), and projects affecting these species may require development of an eagle conservation plan ([http://www.fws.gov/windenergy/eagle\\_guidance.html](http://www.fws.gov/windenergy/eagle_guidance.html)). Additionally, wind energy projects should follow the wind energy guidelines (<http://www.fws.gov/windenergy/>) for minimizing impacts to migratory birds and bats.

Guidance for minimizing impacts to migratory birds for projects including communications towers (e.g., cellular, digital television, radio, and emergency broadcast) can be found at: <http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/towers.htm>; <http://www.towerkill.com>; and <http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/comtow.html>.

We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to include conservation of threatened and endangered species into their project planning to further the purposes of the Act. Please include the Consultation Tracking Number in the header of this letter with any request for consultation or correspondence about your project that you submit to our office.

Attachment(s):

- Official Species List

## Official Species List

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

**New England Ecological Services Field Office**

70 Commercial Street, Suite 300

Concord, NH 03301-5094

(603) 223-2541

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## Project Summary

Consultation Code: 05E1NE00-2018-SLI-0016

Event Code: 05E1NE00-2018-E-00035

Project Name: Sutton MA MS4

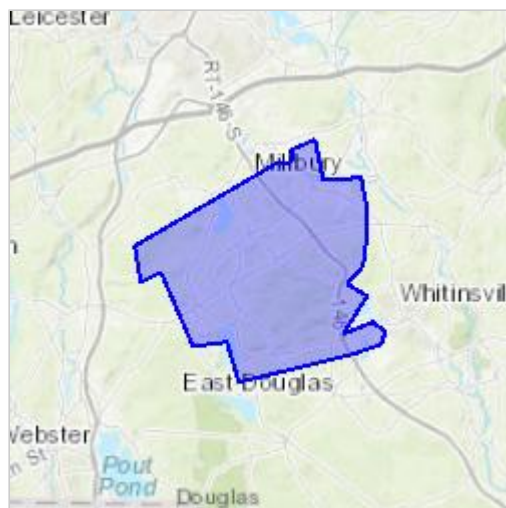
Project Type: Regulation Promulgation

Project Description: Sutton MA MS4, Endangered Species Act Determination

Project Location:

Approximate location of the project can be viewed in Google Maps:

<https://www.google.com/maps/place/42.13690627881061N71.76218704225896W>



Counties: Worcester, MA

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## Endangered Species Act Species

There is a total of 1 threatened, endangered, or candidate species on this species list. Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species. See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

### Mammals

#### NAME

#### STATUS

Northern Long-eared Bat *Myotis septentrionalis*

Threatened

No critical habitat has been designated for this species.

Species profile: <https://ecos.fws.gov/ecp/species/9045>

### Critical habitats

There are no critical habitats within your project area under this office's jurisdiction.

---



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 1  
5 POST OFFICE SQUARE, SUITE 100  
BOSTON, MA 02109-3912

**VIA EMAIL**

February 14, 2019

James Smith  
Town Manager

And;

Matt Stencel  
Highway Superintendent  
4 Uxbridge Road  
Sutton, MA. 01590  
mstencel@town.sutton.ma.us

Re: National Pollutant Discharge Elimination System Permit ID #: MAR041241, Town of Sutton

Dear Matt Stencel:

The 2016 NPDES General Permit for Stormwater Discharges from Small Municipal Separate Storm Sewer Systems in Massachusetts (MS4 General Permit) is a jointly issued EPA-MassDEP permit. Your Notice of Intent (NOI) for coverage under this MS4 General Permit has been reviewed by EPA and appears to be complete. You are hereby granted authorization by EPA and MassDEP to discharge stormwater from your MS4 in accordance with the applicable terms and conditions of the MS4 General Permit, including all relevant and applicable Appendices. This authorization to discharge expires at midnight on **June 30, 2022**.

For those permittees that certified Endangered Species Act eligibility under Criterion C in their NOI, this authorization letter also serves as EPA's concurrence with your determination that your discharges will have no effect on the listed species present in your action area, based on the information provided in your NOI.

As a reminder, your first annual report is due by **September 30, 2019** for the reporting period from May 1, 2018 through June 30, 2019.

Information about the permit and available resources can be found on our website:  
<https://www.epa.gov/npdes-permits/massachusetts-small-ms4-general-permit>. Should you have  
any questions regarding this permit please contact Newton Tedder at [tedder.newton@epa.gov](mailto:tedder.newton@epa.gov) or  
(617) 918-1038.

Sincerely,



Thelma Murphy, Chief  
Stormwater and Construction Permits Section  
Office of Ecosystem Protection  
United States Environmental Protection Agency, Region 1

and;



Lealdon Langley, Director  
Wetlands and Wastewater Program  
Bureau of Water Resources  
Massachusetts Department of Environmental Protection

## **Appendix B**

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### Regulatory Review and Legal Authority



## Appendix C

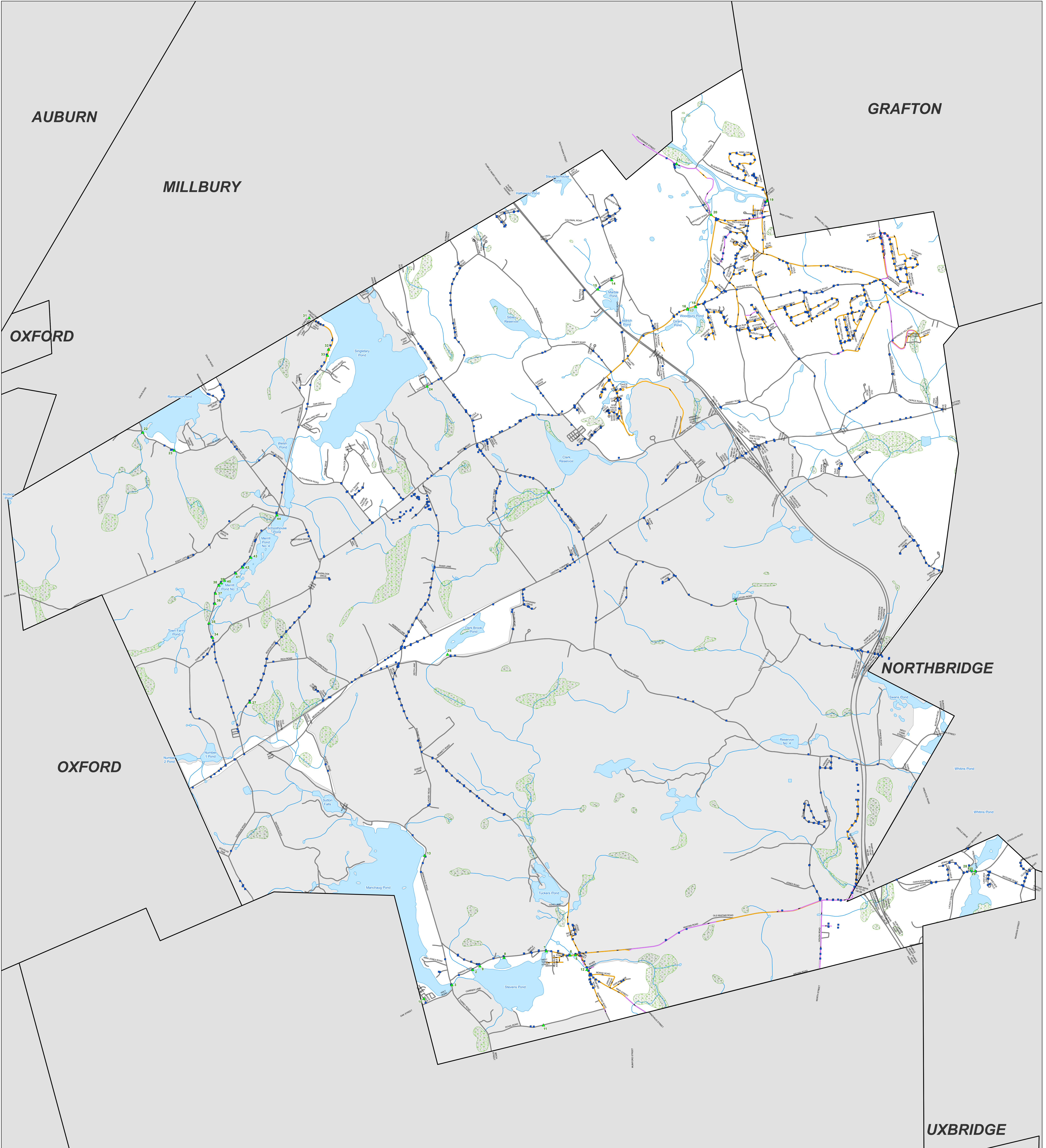
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### Stormwater System Mapping

## Mapping Status

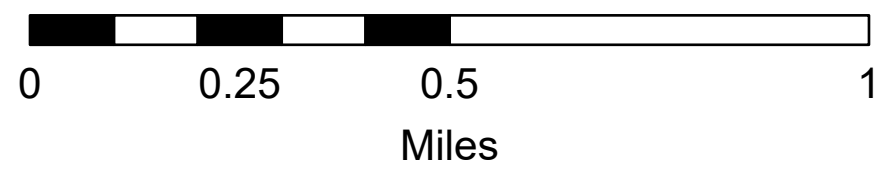
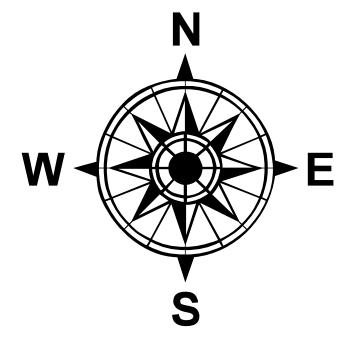
Requirement Summary	Status
<b>Phase I – Must be Complete by July 1, 2020</b>	
1. Outfalls and receiving waters	Complete
2. Open channel conveyances	Not started
3. Interconnections with other MS4s	Not started
4. Municipally owned structural BMPs	Not started
5. Waterbody names and impairments	Complete
6. Initial catchment delineations by topography	Complete (updates ongoing)
<b>Phase II – Must be Complete by July 1, 2028</b>	
1. Outfalls with spatial accuracy +/-30 feet	Complete
2. Pipe connectivity	Not started
3. Manholes	Partially Complete
4. Catch basins	Complete
5. Refined catchment delineations	Not Started
6. Municipal sanitary system	Complete (updates ongoing)
7. Municipal combined sewer system	Not Applicable





**Legend**

- |                  |                       |
|------------------|-----------------------|
| Outfall          | Lake, Pond, Reservoir |
| Catch Basin      | Wetland, Marsh, Swamp |
| Sewer Force Main | Stream, Brook         |
| Sewer Pipe       | Non-Urban Area        |
| Roads            |                       |



**Stormwater Infrastructure Map  
Sutton, MA**

Comprehensive  
Environmental  
Incorporated



Data Sources: CEI, MassGIS, Town of Sutton



## Appendix D

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### Inventory of Town-Owned Property



## Appendix E

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### Street Sweeping Optimization Plan





## Appendix F

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### Catch Basin Optimization Plan

# **Plan for Optimizing Catch Basin Cleaning**

**Sutton, MA**

**June 30, 2019**

## **Prepared For:**

**Town of Sutton**  
4 Uxbridge Rd  
Sutton, MA 01590

## **Prepared by:**

**Comprehensive Environmental Inc.**  
41 Main Street  
Bolton, MA 01740



# Table of Contents

## Plan for Optimizing Catch Basin Cleaning – Sutton, MA

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<b>1</b>	<b>Introduction .....</b>	<b>1</b>
<b>2</b>	<b>Permit Requirements .....</b>	<b>1</b>
<b>3</b>	<b>Existing Catch Basin Management Program .....</b>	<b>2</b>
<b>4</b>	<b>Plans to Refine Catch Basin Cleaning Optimization .....</b>	<b>2</b>
<b>4.1</b>	<b>Optimization Methodology .....</b>	<b>2</b>
<b>4.2</b>	<b>Catch Basin Cleaning Standard Operation Procedure (SOP).....</b>	<b>2</b>
<b>4.3</b>	<b>Catch Basin Cleanings Storage and Disposal.....</b>	<b>2</b>

## List of Appendices

- Appendix A. Map of Drainage Infrastructure
- Appendix B. Standard Operating Procedures for Catch Basin Cleaning and Inspection

# 1 Introduction

This Catch Basin Cleaning Optimization Plan has been prepared by Sutton, MA to address the catch basin inspection, cleaning and maintenance requirements of the United States Environmental Protection Agency's (USEPA's) 2016 National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater Discharges from Small Municipal Separate Storm Sewer Systems (MS4) in Massachusetts, hereafter referred to as the "2016 MS4 Permit."

The 2016 MS4 Permit requires the permittee to document its plan for optimizing catch basin cleaning, inspections, or its schedule for gathering information to develop the optimization plan. This plan documents the Town's existing catch basin cleaning program and its plans for gathering additional information to refine its program to meet the requirements of the permit.

## 2 Permit Requirements

This Catch Basin Cleaning Optimization Plan addresses Section 2.3.7.1.a.iii.2 of the 2016 MS4 Permit (Infrastructure Operations and Maintenance), which includes the following requirements:

- **Establish a schedule** with the goal that the frequency of routine cleaning will ensure that no catch basin at any time will be more than 50 percent full<sup>1</sup>;
- **Prioritize** inspection and maintenance for catch basins:
  - located near construction activities<sup>2</sup>. These should be cleaned more frequently if inspection and maintenance activities indicate excessive sediment or debris loadings;
  - discharging to impaired waters where the pollutant of concern is E. coli or enterococcus; and
  - with sumps more than 50% full during consecutive inspections.
- **Establish proper documentation** of catch basin inspections to include:
  - the location and total number of catch basins;
  - the location and total number of catch basins cleaned or inspected; and
  - the total volume or mass of material removed from catch basin
- **Develop an optimization plan** for catch basin cleaning, inspection plans, or a schedule for gathering information to develop the optimization plan in the first annual report and in the SWMP.

---

<sup>1</sup> A catch basin sump is more than 50 percent full if the contents within the sump exceed one half the distance between the bottom interior of the catch basin to the invert of the deepest outlet of the catch basin.

<sup>2</sup> Roadway construction; residential, commercial, or industrial development or redevelopment.

### 3 Existing Catch Basin Management Program

The Town has approximately 1,450 catch basins to clean and maintain. Refer to the map in **Appendix A**. The town does not currently have a formal catch basin management program.

## 4 Plans to Refine Catch Basin Cleaning Optimization

---

### 4.1 Optimization Methodology

Sutton will continue to implement its existing catch basin cleaning. During this time, it will collect data on the sump depth and sediment depth in each catch basin. A spreadsheet will be used to track sediment depth at each location. The catch basin inspection form included with the standard operating procedure (SOP) in **Appendix B** will be used to document data collected during cleaning.

Data will be collected and evaluated to determine the status of the catch basins and whether the sump was more than half full. The catch basins that are more than 50% full will be evaluated for potential factors that may have contributed to it being 50% full (i.e., smaller sump, nearby construction, surrounding land uses, location in town). The evaluation will be used to identify catch basins that require more frequent inspection and/or cleaning and to develop an optimization plan that prioritizes these structures accordingly.

---

### 4.2 Catch Basin Cleaning Standard Operation Procedure (SOP)

All catch basins will be inspected and cleaned following the standard operating procedures (SOP) provided in **Appendix B**.

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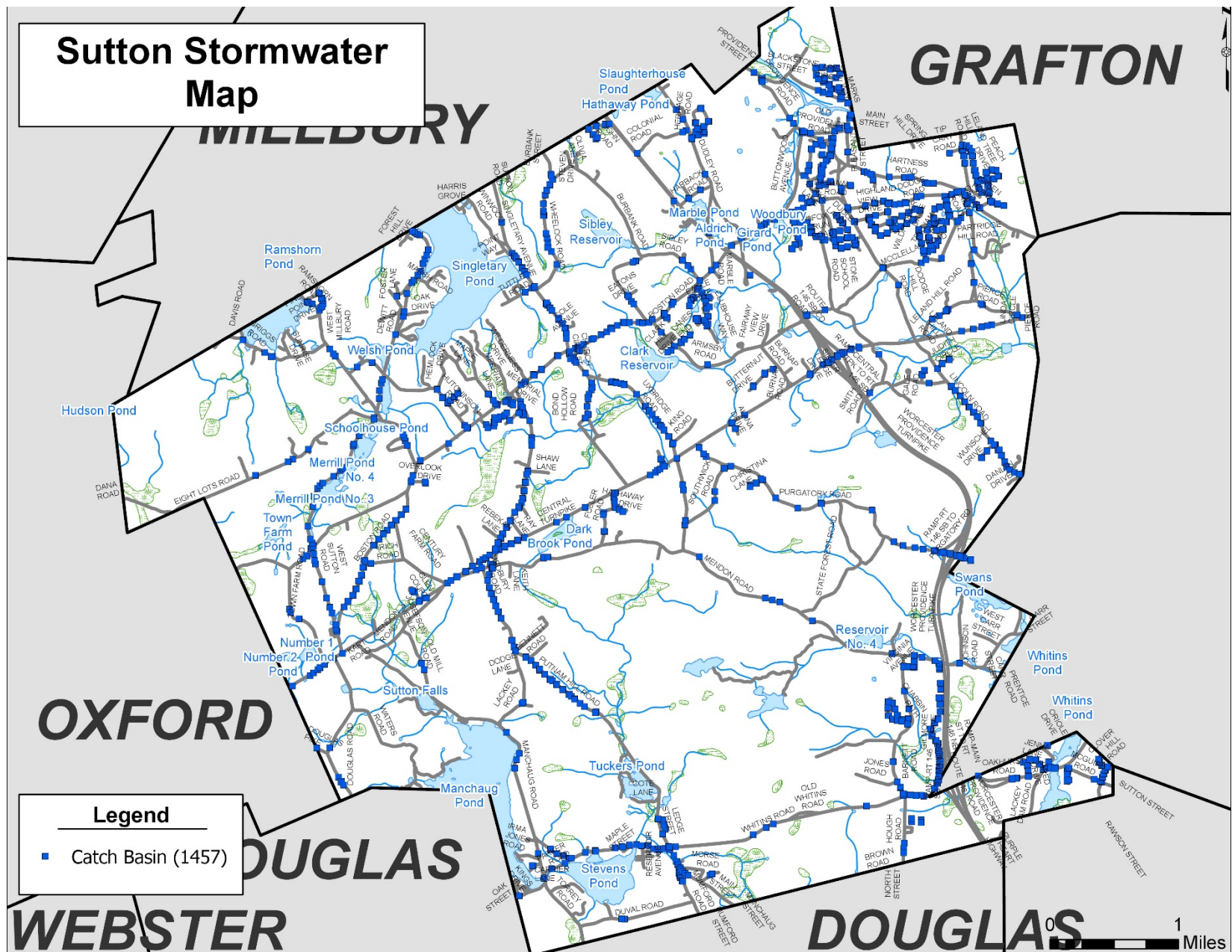
### 4.3 Catch Basin Cleanings Storage and Disposal

Sutton will explore possible beneficial uses for its collected catch basin cleanings.

## Appendix A

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### Map of Drainage Infrastructure





## **Appendix B**

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### Standard Operating Procedures for Catch Basin Cleaning and Inspection

## Permit Requirements

As required by the 2016 MS4 Permit, catch basin inspection and cleaning requirements include the following:

- **Inspect and clean catch basins** to ensure that no catch basin is not more than 50 percent full;
- **Prioritize inspection and maintenance** for catch basins:
  - located near construction activities;
  - discharging to impaired waters; and
  - with sumps more than 50% full during consecutive inspections.
- **Establish proper documentation** of catch basin inspections; and
- **Develop an optimization plan** for catch basin cleaning and inspection.

## Before Cleaning and/or Inspection

- **Notify residents and business** of catch basin cleaning schedule to restrict parking that could obstruct catch basin cleaning operations.
- **Gather** all required forms and maps.
  - Catch Basin Inspection Form; and
  - Maps of area to be cleaned/inspected

## Cleaning and Inspection during Cleaning

1. Clean sediment and trash off of grate.
2. Remove grate.
3. Fill out **Catch Basin Inspection Form** with basin-specific information:
  - **Before cleaning:**
    - Do a visual inspection of outside of grate.
    - Do a visual inspection of the inside of the catch basin to determine cleaning needs and structural issues.
    - Measure depth from rim of catch basin to top of sediment.
    - Measure depth from rim of catch basin to the top of the outlet pipe.
    - Take photo of catch basin.
  - **Clean catch basin:**
    - For manual removal, place removed material in a location protected from potential runoff and place cleanings in a vehicle for transport to designated disposal area.
    - OR use a high-powered vac truck to remove sediment.
  - **After cleaning:**

- Measure depth from rim to bottom of catch basin.
  - Measure depth of sump (outlet pipe to bottom of catch basin).
  - Note if the catch basin is more than 50% full with sediment.
  - Note if the catch basin requires maintenance or if there are pollutants present.
  - Take photo of catch basin.
4. **Storage:** Bring cleanings to designated location for storage and disposal.
  5. If any illicit discharges are observed or suspected, notify supervisor.

### Interim Inspection between Cleaning Cycles

1. Clean sediment and trash off grate.
2. Remove grate.
3. Fill out **Catch Basin Inspection Form** with basin-specific information:
  - Do a visual inspection of outside of grate.
  - Do a visual inspection of the inside of the catch basin to determine cleaning needs and structural issues.
  - Measure depth from rim of catch basin to top of sediment.
  - Using sump depth collected during previous cleaning, note if the catch basin is more than 50% full with sediment.
  - Note if the catch basin requires maintenance or if there are pollutants present.
4. If any illicit discharges are observed or suspected, notify supervisor.

## Catch Basin Inspection Form

Inspection Information									
Catch Basin ID									
Street Location				GPS Location					
Inspector's Name									
Date of Inspection				Time of Inspection					
Weather (circle)		Dry		Light Rain		Heavy Rain		Snow	
Catch Basin Information									
Location		Surface Type				Grate			
<input type="checkbox"/> Road/Curb <input type="checkbox"/> Alley <input type="checkbox"/> Ditch <input type="checkbox"/> Parking Lot <input type="checkbox"/> Driveway <input type="checkbox"/> Sidewalk Other: _____		<input type="checkbox"/> Asphalt <input type="checkbox"/> Gravel <input type="checkbox"/> Concrete <input type="checkbox"/> Grass/Dirt Other: _____				____ inches x ____ inches Material: _____ Shape: _____			
Catch Basin Condition									
CB Damage: No Yes		Comment: _____							
	<b><u>Materials (circle)</u></b>					<b><u>Condition (circle)</u></b>			
Grate	Cast Iron Brick Concrete Aluminum Fiberglass					Poor Fair Good Excellent			
Frame	Cast Iron Brick Concrete Aluminum Fiberglass					Poor Fair Good Excellent			
Chimney	Cast Iron Brick Concrete Aluminum Fiberglass					Poor Fair Good Excellent			
Walls	Cast Iron Brick Concrete Aluminum Fiberglass					Poor Fair Good Excellent			
Trap/Hood	Cast Iron Brick Concrete Aluminum Fiberglass					Poor Fair Good Excellent			
Sump	Cast Iron Brick Concrete Aluminum Fiberglass					Poor Fair Good Excellent			
Sediment Depth and IDDE (inches)									
A. Depth from Rim to Top of Sediment: _____						Check those Present:			
B. Depth from Rim to Bottom of Basin (after vac): _____						__ Sanitary Waste/Smell			
C. Sump Depth: _____						__ Excessive Sediment			
D. Depth of Sediment (B-A): _____						__ Oil Sheen			
E. More than 50% Full of Sediment? (D/C): _____						__ Floatables/Trash			
CB Cleaned? No Yes						__ Pet Waste:			
Suspected illicit discharge? No Yes						Other: _____			
						Potential Source: _____			

## Appendix G

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### List of Stormwater BMPs

## Appendix H

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Annual Reports

# Year 1 Annual Report

## Massachusetts Small MS4 General Permit

### Reporting Period: May 1, 2018-June 30, 2019

**\*\*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.*

### Part I: Contact Information

Name of Municipality or Organization: Town of Sutton

EPA NPDES Permit Number: MAR041241

#### Primary MS4 Program Manager Contact Information

Name: Matt Stencil

Title: Highway Superintendent

Street Address Line 1: 4 Uxbridge Road

Street Address Line 2: na

City: Sutton

State: MA

Zip Code: 01590

Email: mstencil@town.sutton.ma.us

Phone Number: (508) 865-8743

Fax Number: na

#### Stormwater Management Program (SWMP) Information

SWMP Location (web address): <https://www.suttonma.org/highway-department>

Date SWMP was Last Updated: June 30, 2019

If the SWMP is not available on the web please provide the physical address and an explanation of why it is not posted on the web:



## Part II: Self Assessment

First, in the box below, select the impairment(s) and/or TMDL(s) that are applicable to your MS4.

### 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 1 Requirements

- ☐ Develop and begin public education and outreach program  
☒ Identify and develop inventory of all known locations where SSOs have discharged to the MS4 in the last 5 years
  - ☐ The SSO inventory is attached to the email submission
  - ☒ The SSO inventory can be found at the following website:  

<https://www.suttonma.org/highway-department; IDDE Plan, Appendix B>☒ Develop written IDDE plan including a procedure for screening and sampling outfalls  
☒ IDDE ordinance complete  
☒ Identify each outfall and interconnection discharging from MS4, classify into the relevant category, and priority rank each catchment for investigation
  - ☐ The priority ranking of outfalls/interconnections is attached to the email submission
  - ☒ The priority ranking of outfalls/interconnections can be found at the following website:  

<https://www.suttonma.org/highway-department; IDDE Plan, Appendix C>☐ Construction/ Erosion and Sediment Control (ESC) ordinance complete  
☐ Develop written procedures for site inspections and enforcement of sediment and erosion control measures  
☐ Develop written procedures for site plan review  
☒ Keep a log of catch basins cleaned or inspected  
☐ Complete inspection of all stormwater treatment structures

### Annual Requirements

- ☒ Annual opportunity for public participation in review and implementation of SWMP
- ☒ Comply with State Public Notice requirements
- ☒ 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
- ☒ All curbed roadways have been swept a minimum of one time per year

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

Annual Requirements

*Public Education and Outreach\**

- ☐ Distribute 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
- ☒ Distribute an annual message in the summer (June/July) encouraging the proper management of pet waste, including noting any existing ordinances where appropriate
- ☐ Distribute 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*

- ☒ Increase 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 listed in Table 3 of Attachment 1 to Appendix H already existing or installed in the regulated area by the permittee or its agents shall be tracked and the permittee shall estimate the

- ☐ nitrogen removal by the BMP consistent with Attachment 1 to Appendix H. Document 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 in each annual report

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

Annual Requirements

*Public Education and Outreach\**

- ☐ Distribute 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 and phosphorus-free fertilizers
- ☒ Distribute an annual message in the summer (June/July) encouraging the proper management of pet waste, including noting any existing ordinances where appropriate
- ☐ Distribute 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*

- ☒ Increase 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 listed in Attachment 3 to Appendix F already existing or installed in the regulated area by the permittee or its agents shall be tracked and the permittee shall estimate the phosphorus

- ☐ removal by the BMP consistent with Attachment 1 to Appendix H. Document 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 in each annual report

**Solids, Oil and Grease (Hydrocarbons), or Metals**

Annual Requirements

*Good Housekeeping and Pollution Prevention for Permittee Owned Operations*

- ☒ Increase street sweeping frequency of all municipal owned streets and parking lots to a schedule to target areas with potential for high pollutant loads
- Prioritize inspection and maintenance for catch basins to ensure that no sump shall be more than 50
- ☒ percent full; Clean catch basins more frequently if inspection and maintenance activities indicate excessive sediment or debris loadings

Use the box below to input additional details on any unchecked boxes above or any additional information you would like to share as part of your self assessment:

Public Education and Outreach - Town has not yet developed a comprehensive public education program, however, is planning on developing this program in Year 2. This program is expected to consist of website text with a permit overview, specific messages and topics for each of the Town's four audiences, links to external websites, and links for download for different outreach brochures. This program will also consist of a detailed schedule for material distribution, including seasonal messages for nitrogen and phosphorus TMDL and impaired waters requirements. Seasonal message outreach will start during Year 2.

Construction/Erosion and Sediment Control Ordinance requirements are partially met in the existing Town regulations which in part require erosion controls and site plan review. However, these do not provide a comprehensive, permit-compliant program, nor do they apply to all sites that disturb one acre or more. Regulations will be revised along with the post-construction ordinance updates to be completed during Year 2.

Procedures for Site Plan Review and Site Inspections - The Town has some existing requirements under its Site Plan Review and Subdivision regulations, however these do not provide a comprehensive program that applies to all sites that disturb one acre or more. These will be revised along with the ordinance updates to be completed during Year 2.

Stormwater BMP Inspections - The Town is currently developing an inventory of its town-owned Stormwater BMPs. Inspections are expected to begin during Year 2.

IDDE Training - An employee IDDE Training program will be developed during Year 2, with annual training to be performed starting in Year 2.

Nitrogen/Phosphorus Structural BMP Tracking - The Town will begin evaluation of its permittee-owned stormwater BMPs during future years in conjunction with preparing the nutrient source identification reports. It is expected this task will not start until at least Year 3.

Increased Sweeping for High Pollutant Loads - This was determined not to be necessary for the Town as these areas are not observed to accumulate more sediment and debris than other areas within the Town.

### **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 the reporting period:

*Below, report on the educational messages completed during the first year. For the measurable goal(s) please describe the method/measures used to assess the overall effectiveness of the educational program.*

#### **BMP: Storm Drain Stenciling**

Message Description and Distribution Method:

Highway Department staff stenciled catch basins with "No Pet Waste" and "Drains to Waterways" labels to raise awareness about stormwater pollution.

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

55 basins were stenciled during Year 1.

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:

The Town determined that this is will help raise awareness of pet waste impacts on receiving waterbodies.

---

#### **BMP: Pet Waste Informational Brochure**

Message Description and Distribution Method:

Distributed information regarding the proper disposal of pet waste with all dog licenses and renewals.

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

Provide informational brochure/flyer with all applications or renewals.

Message Date(s): N/A (Ongoing)

Message Completed for: Appendix F Requirements ☒ Appendix H Requirements ☒

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

If yes, describe why the change was made:

---

### **BMP: Distribute Brochures**

Message Description and Distribution Method:

Brochures distributed at Town Hall with general information on stormwater.

Targeted Audience: Residents

Responsible Department/Parties: Highway Department

Measurable Goal(s):

Make informational flyers available to residents at several town-owned buildings.

Message Date(s): Ongoing

Message Completed for: Appendix F Requirements ☐ Appendix H Requirements ☐

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

If yes, describe why the change was made:

---

Add an Educational Message

### **MCM2: Public Participation**

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

SWMP Plan for Download - The Town has posted the SWMP Plan on Town website along with contact information to allow for public comment.



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

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

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

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

*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:

*Below, report on the total number of SSOs identified in the MS4 system and removed to date. At a minimum, report SSOs identified since 2013.*

Total number of SSOs identified:

Total number of SSOs removed:

#### **MS4 System Mapping**

Describe the status of your MS4 map, including any progress made during the reporting period:

The Town has completed multiple Phase I mapping requirements under the 2016 Permit. Outfalls and receiving waters within the Town's urbanized area, along with catchment delineations, have been mapped. Impaired waters have also been mapped. The Town will work toward identifying its stormwater treatment structures, interconnections with other towns, and open channel conveyances in Permit Year 2.

#### **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.*

- ☐ 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 total outfalls/ interconnections screened to date.*

Percent of total outfalls screened: 0%

### **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.*

- ☐ The catchment investigation data is attached to the email submission
- ☐ The catchment investigation data can be found at the following website:

N/A, none completed to date

*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:*

N/A, not yet started

### **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.*

- ☐ The illicit discharge removal report is attached to the email submission
- ☒ The illicit discharge removal report can be found at the following website:

N/A, none completed to date

*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: N/A [UNITS]

*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.*

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:

N/A, none completed to date

### **Employee Training**

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

An employee IDDE Training program will be developed during Year 2, with annual training to be performed starting in Year 2.

### **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: 6

Number of inspections completed: 0

Number of enforcement actions taken: 0

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

#### **Ordinance Development**

Describe the status of the post-construction ordinance required to be complete in year 2 of the permit term:

The Town is currently reviewing a draft Post-Construction Stormwater Management Ordinance during Year 2. It is anticipated that this ordinance will be put up for vote at the spring 2020 town meeting. Accompanying regulations will be prepared concurrent with the bylaw with a goal of adopting in the spring.

#### **As-built Drawings**

Describe the status of the measures the MS4 has utilized to require the submission of as-built drawings and ensure long term operation and maintenance of completed construction sites required to be complete in year 2 of the permit term:

As part of the regulatory updates to be performed during Year 2, procedures for submittal of as-built drawings and long term operation and maintenance will be developed.

**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:

N/A, to be completed during future permit years.

**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:

N/A, to be completed during future permit years.

**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 is currently developing an inventory of its permittee-owned properties. Once completed, facilities will be evaluated for potential BMP retrofit opportunities during future permit years.

**MCM6: Good Housekeeping****Catch Basin Cleaning**

Describe the status of the catch basin cleaning optimization plan:

The Town developed a Catch Basin Cleaning Optimization Plan during Year 1 as a component of its SWMP P.

*If complete, attach the catch basin cleaning optimization plan or the schedule to gather information to develop the optimization plan:*

- ☐ The catch basin cleaning optimization plan or schedule is attached to the email submission
- ☒ The catch basin cleaning optimization plan or schedule can be found at the following website:

<https://www.suttonma.org/highway-department; SWMP Plan, Appendix G>

*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, if known.*

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 is collecting data on catch basins and have not yet performed two consecutive inspection or cleaning events.

### **Street Sweeping**

Describe the status of the written procedures for sweeping streets and municipal-owned lots:

The Town developed a Street Sweeping Optimization Plan during Year 1 as a component of its SWMP Plan. This consists of a map displaying sweeping requirements throughout the Town and a Standard Operating Procedure (SOP) for completing the sweeping.

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

☒ Number of miles cleaned:

☐ Volume of material removed:

☐ Weight of material removed:

*If applicable:*

For rural uncurbed roadways with no catch basins, describe the progress of the inspection, documentation, and targeted sweeping plan:

Highway personnel observe all regulated town-owned roadways for maintenance needs, including street sweeping, during routine operations. Personnel also observe known trouble areas, such as projects with large-scale construction projects or projects with substantial land disturbance, for evidence of runoff-laden sediment onto roadways that may require more frequent sweeping in addition to that outlined under the Street Sweeping Optimization Plan. In addition, town residents periodically call the Highway to report localized areas needing sweeping that Highway personnel then visit to inspect. Should areas in need of additional sweeping be observed, the Town documents these areas as part of its Street Sweeping Optimization Plan and schedules areas for sweeping during the next upcoming round. Note that the Town applies no sand to roadways during winter operations, and thus observed sweeping needs are typically minimal. Inspections of rural uncurbed roadways conducted to date have not yet observed any needs for additional sweeping within regulated urbanized area roadways.

**Winter Road Maintenance**

Describe the status of the written procedures for winter road maintenance including the storage of salt and sand:

The Town developed SOPs for winter road maintenance during Year 1. These SOPs will be included as part of a larger comprehensive Operation and Maintenance (O&M) Plan during Year 2 that covers other facilities and stormwater infrastructure.

**Inventory of Permittee-Owned Properties**

Describe the status of the inventory, due in year 2 of the permit term, of permittee-owned properties, including parks and open spaces, buildings and facilities, and vehicles and equipment, and include any updates:

The Town is currently developing an inventory of its permittee-owned properties, to be completed by the end of Year 2.

**O&M Procedures for Parks and Open Spaces, Buildings and Facilities, and Vehicles and Equipment**

Describe the status of the operation and maintenance procedures, due in year 2 of the permit term, of permittee-owned properties (parks and open spaces, buildings and facilities, vehicles and equipment) and include maintenance activities associated with each:

The Town is currently developing O&M Procedures for its Parks and Open Spaces, Buildings and Facilities, and Vehicles and Equipment, to be completed by the end of Year 2.

**Stormwater Pollution Prevention Plan (SWPPP)**

Describe the status of any SWPPP, due in year 2 of the permit term, for permittee-owned or operated facilities including maintenance garages, public works yards, transfer stations, and other waste handling facilities where pollutants are exposed to stormwater:

During Year 2, the Town will complete a comprehensive facility assessment and complete SWPPPs for applicable facilities by the end of Year 2.

*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:

N/A

**O&M Procedures for Stormwater Treatment Structures**

Describe the status of the written procedure for stormwater treatment structure maintenance:

The Town is currently developing an inventory of its town-owned Stormwater BMPs. Once complete, the Town will inspect all regulated stormwater BMPs annually and perform maintenance as needed.

**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:

N/A, not yet started.

**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:

Activities performed during Year 1 include submittal of a Notice of Intent, development of a comprehensive Stormwater Management Program (SWMP) Plan which in part also included development of a Catch Basin Cleaning Optimization Plan and Street Sweeping Optimization Plan, development of a comprehensive Illicit Discharge Detection and Elimination (IDDE) Plan which in part included creation of procedures for identifying and removing illicit discharges along with classifying, prioritizing, and delineating catchment areas. Other activities completed included development of winter operation and maintenance procedures and completing an assessment of existing stormwater-related regulatory mechanisms.

**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 2 requirements summarized below. (Note: impaired waters and TMDL requirements are not listed below)

Yes, I agree ☒



- Complete system mapping Phase I
- Begin investigations of catchments associated with Problem Outfalls
- Develop or modify an ordinance or other regulatory mechanism for post-construction stormwater runoff from new development and redevelopment
- Establish and implement written procedures to require the submission of as-built drawings no later than two years after the completion of construction projects
- Develop, if not already developed, written operations and maintenance procedures
- Develop an inventory of all permittee owned facilities in the categories of parks and open space, buildings and facilities, and vehicles and equipment; review annually and update as necessary
- Establish a written program detailing the activities and procedures the permittee will implement so that the MS4 infrastructure is maintained in a timely manner
- Develop and implement a written SWPPP for maintenance garages, public works yards, transfer stations, and other waste handling facilities where pollutants are exposed to stormwater
- Enclose or cover storage piles of salt or piles containing salt used for deicing or other purposes
- Develop, if not already developed, written procedures for sweeping streets and municipal-owned lots
- Develop, if not already developed, written procedures for winter road maintenance including storage of salt and sand
- Develop, if not already developed, a schedule for catch basin cleaning
- Develop, if not already developed, a written procedure for stormwater treatment structure maintenance
- Develop a written catchment investigation procedure (*18 months*)

#### 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 in the last 5 years
- 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 uncurbed streets at least annually

Provide any additional details on activities planned for permit year 2 below:

**Part V: Certification of Small MS4 Annual Report 2019****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.

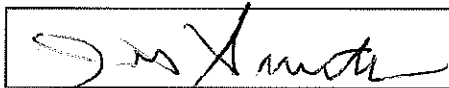
Name:

James Smith

Title:

Town Manager

Signature:



Date:

9/30/19

*[Signatory may be a duly authorized representative]*

# Year 2 Annual Report

## Massachusetts Small MS4 General Permit

### Reporting Period: July 1, 2019-June 30, 2020

**\*\*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, 2019 and June 30, 2020 unless otherwise requested.*

## Part I: Contact Information

Name of Municipality or Organization: Town of Sutton

EPA NPDES Permit Number: MAR041241

### Primary MS4 Program Manager Contact Information

Name: Matt Stencil

Title: Highway Superintendent

Street Address Line 1: 4 Uxbridge Road

Street Address Line 2: N/A

City: Sutton

State: MA

Zip Code: 01590

Email: mstencil@town.sutton.ma.us

Phone Number: (508) 865-8743

### Stormwater Management Program (SWMP) Information

SWMP Location (web address): [https://www.suttonma.org/sites/g/files/vyhlf3901/f/uploads/2019\\_sutton\\_swmp\\_plan\\_final.pdf](https://www.suttonma.org/sites/g/files/vyhlf3901/f/uploads/2019_sutton_swmp_plan_final.pdf)

Date SWMP was Last Updated: June 30, 2019

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 2 Requirements

- ☐ Completed Phase I of system mapping  
☒ Developed a written catchment investigation procedure and added the procedure to the SWMP  
☐ Developed written procedures to require the submission of as-built drawings and ensure the long term operation and maintenance of completed construction sites and added these procedures to the SWMP  
☒ Enclosed or covered storage piles of salt or piles containing salt used for deicing or other purposes  
☒ Developed written operations and maintenance procedures for parks and open space, buildings and facilities, and vehicles and equipment and added these procedures to the SWMP  
☒ Developed an inventory of all permittee owned facilities in the categories of parks and open space, buildings and facilities, and vehicles and equipment and added this inventory to the SWMP  
☒ Completed a written program for MS4 infrastructure maintenance to reduce the discharge of pollutants  
 Developed written SWPPPs, included in the SWMP, for all of the following permittee owned or  
☒ operated facilities: maintenance garages, public works yards, transfer stations, and other waste handling facilities where pollutants are exposed to stormwater

*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 2 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:

Phase I mapping - mapping of open channel conveyances and any newly located outfalls is ongoing. Mapping interconnections with other MS4s (e.g. DOT) is ongoing, and it is expected that this will continue as part of DOT's own mapping efforts to be completed under a future TS4 permit.

As-Built and Long-Term O&M - the Town is working on incorporating procedures for submittal of as-builts and require long term operation and maintenance as part of its stormwater regulatory updates to be completed as part of the Year 3 requirements under EPA's pending updated permit schedule.

### 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 outfall and interconnection inventory and priority ranking as needed

*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:

IDDE Training - training was not performed during this permit year due to COVID-19 social distancing requirements and limited staff availability.

Outfall Inventory and Ranking - the outfall and interconnection inventory is updated on an ongoing basis as dry weather screening is performed. The priority ranking will be updated after dry weather inspections are completed and before catchment investigations commence.

### **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:

Public Education and Outreach - during Year 2, the Town developed a comprehensive public education program. In part, this program consisted of website text with a permit overview, specific messages and topics for each of the Town's four audiences, links to external websites, and links for download of approximately 20 different outreach brochures. The Town is still working to bring this website online. The Town also distributed flyers with all pet registrations and renewal applications. Additional public education messaging was not completed during Year 2 in part due to the COVID-19 outbreak.

## **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)

#### *Potential structural BMPs*

- ☐ Any structural BMPs listed in Table 3 of Attachment 1 to Appendix H 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 1 to Appendix H. 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.

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

*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:

Public Education and Outreach - during Year 2, the Town developed a comprehensive public education program. In part, this program consisted of website text with a permit overview, specific messages and topics for each of the Town's four audiences, links to external websites, and links for download of approximately 20 different outreach brochures. The Town is still working to bring this website online. The Town also distributed flyers with all pet registrations and renewal applications. Additional public education messaging



was not completed during Year 2 in part due to the COVID-19 outbreak.

Street Sweeping - streets were swept only once during Year 2.

Structural BMPs - BMPs pollutant removal has not yet been computed, however, it is expected that this will be completed during Year 4 as part of a Nitrogen Source Identification Report for Long Island Sound.

## **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:

*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:

Public Education and Outreach - during Year 2, the Town developed a comprehensive public education program. In part, this program consisted of website text with a permit overview, specific messages and topics for each of the Town's four audiences, links to external websites, and links for download of approximately 20 different outreach brochures. The Town is still working to bring this website online. The Town also distributed flyers with all pet registrations and renewal applications. Additional public education messaging was not completed during Year 2 in part due to the COVID-19 outbreak.

Street Sweeping - streets were swept only once during Year 2.

Structural BMPs - BMPs pollutant removal has not yet been computed, however, it is expected that this will be completed during Year 4 as part of a Phosphorus Source Identification Report for the Blackstone River.

**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:

Street Sweeping - all streets were swept once during Year 2.

Increased Sweeping for High Pollutant Loads - this was determined not to be necessary for the Town as these areas are not observed to accumulate more sediment and debris than other areas within the Town.

*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:

The Town has determined it is subject to the following additional TMDL and Impaired Waters requirements:

- Blackstone River (MA51-03), bacteria water quality impairments requirements (Appendix H, Part III)

The following changes were made that do not affect TMDL and Impaired Waters requirements:

- Hudson Pond (MA42029), nutrient/eutrophication biological indicators impairment added to 303(d) list
- Sutton Falls (MA51163), harmful algal blooms impairment added to 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: Social Media**

Message Description and Distribution Method:

Provide relevant stormwater information to different audiences via social media.

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

Post periodic updates onto Town's social media page.

Message Date(s):

Message Completed for:    Appendix F Requirements ☒    Appendix H Requirements ☒

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

If yes, describe why the change was made:

---

#### **BMP:Pet Waste Informational Brochure**

Message Description and Distribution Method:

Distributed information regarding the proper disposal of pet waste with all dog licenses and renewals.

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

Provide informational brochure/flyer with all applications or renewals. The Town distributed approximately 1,100 flyers during Permit Year 2.

Message Date(s): Ongoing

Message Completed for: Appendix F Requirements ☒ Appendix H Requirements ☒

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

If yes, describe why the change was made:

---

### **BMP: Distribute Brochures**

Message Description and Distribution Method:

Brochures distributed at Town Hall with general information on stormwater.

Targeted Audience: Residents

Responsible Department/Parties: Highway Department

Measurable Goal(s):

Make informational flyers available to residents at several town-owned buildings.

Message Date(s): Ongoing

Message Completed for: Appendix F Requirements ☒ Appendix H Requirements ☒

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

If yes, describe why the change was made:

---

Add an Educational Message

### **MCM2: Public Participation**

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

SWMP Plan for Download - The Town has posted the SWMP Plan on Town website along with contact information to allow for public comment.

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

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

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

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

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

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

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

Number of SSOs identified:

Number of SSOs removed:

#### **MS4 System Mapping**

*Below, check all that apply.*

The following elements of the Phase I map have been completed:

- ☒ Outfalls and receiving waters
- ☐ Open channel conveyances
- ☐ Interconnections
- ☒ Municipally-owned stormwater treatment structures
- ☒ Waterbodies identified by name and indication of all use impairments
- ☒ Initial catchment delineations

*Optional:* Describe any additional progress you made on your map during this reporting period or provide additional status information regarding your map:

Phase I Mapping - all known outfalls, stormwater BMPs, and receiving waterbodies with impairments have been mapped to date. Initial catchment delineations have also been completed based on topographic mapping and available stormwater system information. Mapping of open channel conveyances and any newly located outfalls is ongoing. Mapping interconnections with other MS4s (e.g. DOT) is ongoing, and it is expected that this will continue as part of DOT's own mapping efforts to be completed under a future TS4 permit.

#### **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.*

☐ The outfall screening data is attached to the email submission



- ☐ The outfall screening data can be found at the following website:

N/A, none completed to date

*Below, report on the number of outfalls/interconnections screened **during this reporting period.***

Number of outfalls screened:

### **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.*

- ☐ The catchment investigation data is attached to the email submission  
☐ The catchment investigation data can be found at the following website:

N/A, none completed to date

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

Number of catchment investigations completed this reporting period:

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

Percent of total catchments investigated:

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

### **IDDE Progress**

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

- ☐ The illicit discharge removal report is attached to the email submission  
☐ The illicit discharge removal report can be found at the following website:

N/A, none found to date

*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:

### **Employee Training**

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

IDDE Training - training was not performed during this permit year due to COVID-19 social distancing requirements and limited staff availability.

### **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**

*Below, select the option that describes your ordinance or regulatory mechanism progress.*

- ☐ Bylaw, ordinance, or regulations are updated and adopted consistent with permit requirements
- ☐ Bylaw, ordinance, or regulations are updated consistent with permit requirements but are not yet adopted
- ☒ Bylaw, ordinance, or regulations have not been updated or adopted

### **As-built Drawings**

Describe the measures the MS4 has utilized to require the submission of as-built drawings and ensure long term operation and maintenance of completed construction sites:

The Town is working on incorporating procedures for submittal of as-builts and long term operation and maintenance as part of its stormwater regulatory updates to be completed as part of the Year 3 requirements under EPA's pending updated permit schedule.

### **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:

N/A, to be completed during future permit years.

### **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:

N/A, to be completed during future permit years.

### **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 completed an inventory of its permittee-owned properties during this permit year. Facilities will be evaluated for potential BMP retrofit opportunities during future permit years.

## **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:

Not yet applicable.

### **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:

### **O&M Procedures and Inventory of Permittee-Owned Properties**

*Below, check all that apply.*

The following permittee-owned properties have been inventoried:

- ☒ Parks and open spaces
- ☒ Buildings and facilities
- ☒ Vehicles and equipment

The following O&M procedures for permittee-owned properties have been completed:

- ☒ Parks and open spaces
- ☒ Buildings and facilities
- ☒ Vehicles and equipment

### **Stormwater Pollution Prevention Plan (SWPPP)**

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

Number of site inspections completed:

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

Not applicable, no corrective actions have been taken to date. Note that a SWPPP for the Highway Garage was completed in June 2020. Quarterly site inspections will begin during Year 3.

## **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:

N/A, not started yet.

### **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 2 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:

IDDE Training - training was not performed during this permit year due to COVID-19 social distancing requirements and limited staff availability.

Public Education and Outreach - additional public education messaging was not completed during Year 2 in part due to the COVID-19 outbreak.

Road Maintenance - COVID-19 forced the full closure of the Highway Department for approximately two to three weeks during the spring months. The Highway Department also had several weeks where they were forced to run smaller crews due to social distancing requirements. This delayed much of the Town's roadway and stormwater infrastructure maintenance program, such as street sweeping, catch basin cleaning. etc.

### **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 3 requirements summarized below. (Note: impaired waters and TMDL requirements are not listed below)

Yes, I agree ☒

- Inspect all outfalls/ interconnections (excluding Problem and Excluded outfalls) for the presence of dry weather flow
- Complete follow-up ranking as dry weather screening becomes available

### **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 uncurbed streets at least annually
- Continue investigations of catchments associated with Problem Outfalls
- 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

Provide any additional details on activities planned for permit year 3 below:



**Part V: Certification of Small MS4 Annual Report 2020****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.

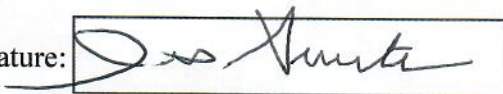
Name:

James Smith

Title:

Town Manager

Signature:



Date:

9/24/20

*[Signatory may be a duly authorized representative]*

# 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>

<b>Impairment(s)</b>			
<input checked="" type="checkbox"/> Bacteria/Pathogens	<input type="checkbox"/> Chloride	<input type="checkbox"/> Nitrogen	<input checked="" type="checkbox"/> Phosphorus
<input checked="" type="checkbox"/> Solids/ Oil/ Grease (Hydrocarbons)/ Metals			
<b>TMDL(s)</b>			
<i>In State:</i>	<input type="checkbox"/> Assabet River Phosphorus	<input type="checkbox"/> Bacteria and Pathogen	<input type="checkbox"/> Cape Cod Nitrogen
	<input type="checkbox"/> Charles River Watershed Phosphorus	<input type="checkbox"/> Lake and Pond Phosphorus	
<i>Out of State:</i>	<input type="checkbox"/> Bacteria/Pathogens	<input type="checkbox"/> Metals	<input checked="" type="checkbox"/> Nitrogen
			<input type="checkbox"/> 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:

Dry Weather Outfall Screening - as of the conclusion of Year 3, the Town had not yet inspected outfalls for dry weather flow. However, 40 of the 43 known outfalls were attempted to be inspected over 2 days in July and August 2021. Of the 40 known stormwater outfalls that were attempted to be inspected, 32 were located and 6 of which were flowing. The 6 flowing outfalls were sampled and did not meet the permit criteria for being highly likely to contain illicit discharges. The remaining 8 outfalls that could not be located or accessed were instead investigated at the immediate upgradient structure for potential illicit discharge indicators, of which none were observed. The 3 remaining outfalls that have not yet been addressed will be inspected during Year 4.

Update Outfall Inventory and Priority Ranking - Outfall inventory and priority ranking was conducted concurrent with a comprehensive update of the SWMP and IDDE Plans, completed on August 31, 2021. The Town will continue to locate and inspect additional stormwater infrastructure during future permit years.

Construction and Post-Construction Regulatory Mechanism - Draft regulations are currently under review by the various departments to be involved with regulatory implementation. Due to COVID-19, the Town has tried to minimize meetings as much as possible.

### 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:

IDDE Training - training was not performed during this permit year due to COVID-19 social distancing requirements and limited staff availability.

### **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:

**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)

*Potential structural BMPs*

- Any structural BMPs listed in Table 3 of Attachment 1 to Appendix H 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 1 to Appendix H. 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.

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

*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:

Street Sweeping - 95 miles of roadway were swept once and 20 miles were swept a second time.

Structural BMPs - BMPs pollutant removal has not yet been computed, however, it is expected that this will be completed during Year 4 as part of a Phosphorus Source Identification Report for the Blackstone River.

## **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:

*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:

Street Sweeping - 95 miles of roadway were swept once and 20 miles were swept a second time.

Structural BMPs - BMPs pollutant removal has not yet been computed, however, it is expected that this will be completed during Year 4 as part of a Phosphorus Source Identification Report for the Blackstone River.

## **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:

Street Sweeping - all streets were swept once during Year 3.

Increased Sweeping for High Pollutant Loads - this was determined not to be necessary for the Town as these areas are not observed to accumulate more sediment and debris than other areas within the Town.

*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:

The Town has determined it is subject to the following additional TMDL and Impaired Waters requirements:

- Blackstone River (MA51-03), bacteria water quality impairments requirements (Appendix H, Part III)

The following changes were made that do not affect TMDL and Impaired Waters requirements:

- Hudson Pond (MA42029), nutrient/eutrophication biological indicators impairment added to 303(d) list
- Sutton Falls (MA51163), harmful algal blooms impairment added to 303(d) list

The Town also updated its list of outfalls and receiving waters as new outfalls were found during the dry weather screening. The inspection results are attached to this annual report and a list and updated prioritization are also kept with the Town's IDDE Plan.

## Part IV: Minimum Control Measures

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

### MCM1: Public Education

Number of educational messages completed **during this reporting period:**

*Below, report on the educational messages completed **during this reporting period**. For the measurable goal(s) please describe the method/measures used to assess the overall effectiveness of the educational program.*

#### **BMP: Pet Waste Informational Brochure**

Message Description and Distribution Method:

Distributed information regarding the proper disposal of pet waste with all dog licenses and renewals.

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

Provide informational brochure/flyer with all applications or renewals. The Town distributed approximately 1,100 flyers during Permit Year 2.

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: Distribute Brochures**

Message Description and Distribution Method:

Brochures distributed at Town Hall with general information on stormwater.

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

Make informational flyers available to residents at several town-owned buildings.

Message Date(s): Continuous / Ongoing

Message Completed for: Appendix F Requirements ☒ Appendix H Requirements ☒

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

If yes, describe why the change was made:

Add an Educational Message

## MCM2: Public Participation

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

SWMP Plan for Download - The Town has posted the SWMP Plan and other relevant information on Town website along with contact information to allow for public comment.

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:

### **MS4 System Mapping**

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

All known outfalls and receiving waterbodies with impairments have been mapped to date. Initial catchment delineations have also been completed based on topographic mapping and available stormwater system information. Mapping of open channel conveyances and any newly located outfalls is ongoing. Mapping interconnections with other MS4s (e.g. DOT) is ongoing, and it is expected that this will continue as part of DOT's own mapping efforts to be completed under a future TS4 permit.

### **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:

As of the conclusion of Year 3, the Town had not yet inspected outfalls for dry weather flow. However, 40 of the 43 known outfalls were attempted to be inspected over 2 days in July and August 2021. Of the 40 known stormwater outfalls that were attempted to be inspected, 32 were located and 6 of which were flowing. The 6 flowing outfalls were sampled and did not meet the permit criteria for being highly likely to contain illicit discharges. The remaining 8 outfalls that could not be located or accessed were instead investigated at the immediate upgradient structure for potential illicit discharge indicators, of which none were observed. The 3 remaining outfalls that have not yet been addressed will be inspected during Year 4.

### **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:**

Training was not performed during this permit year due to COVID-19 social distancing requirements and limited staff availability.

**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: 8

Number of inspections completed: 0

Number of enforcement actions taken: 0

*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****As-built Drawings**

*Below, report on the number of as-built drawings received **during this reporting period**.*

Number of as-built drawings received: 4

*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:

N/A, to be completed during Permit Year 4.

### **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:

N/A, to be completed during Permit Year 4.

### **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 completed an inventory of its permittee-owned properties during this permit year. Facilities will be evaluated for potential BMP retrofit opportunities during Permit Year 4.

## **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:

### **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:

Not applicable, no corrective actions have been taken to date. Note, the SWPPP for the Highway Garage was finalized in Q2 of 2021, thus, only one inspection has been completed to date.

**Additional Information****Monitoring or Study Results**

*Results from any other stormwater or receiving water quality monitoring or studies conducted during the reporting period not otherwise mentioned above, where the data is being used to inform permit compliance or permit effectiveness must be attached.*

- ☒ Not applicable
- ☐ The results from additional reports or studies are attached to the email submission
- ☐ The results from additional reports or studies can be found at the following 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:

### **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:

**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.

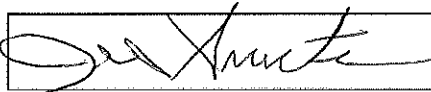
Name:

James Smith

Title:

Town Manager

Signature:



Date:

9/27/21

*[Signatory may be a duly authorized representative]*