

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 Dracut

EPA NPDES Permit Number: MAR041194

Primary MS4 Program Manager Contact Information

Name: Tina Douk

Title: Stormwater Manager

Street Address Line 1: 62 Arlington Street

Street Address Line 2:

City: Dracut

State: MA Zip Code: 01826

Email: Tdouk@dracutma.gov

Phone Number: (978) 957-1497

Stormwater Management Program (SWMP) Information

SWMP Location (web address): <https://www.dracutma.gov/stormwater-permitting-authority/news/dracut-stormwater-management-program>

Date SWMP was Last Updated: 6/30/2020

If the SWMP is not available on the web please provide the physical address:

Part II: Self-Assessment

First, in the box below, select the impairment(s) and/or TMDL(s) that are applicable to your MS4. Make sure you are referring to the most recent EPA approved Section 303(d) Impaired Waters List which can be found here: <https://www.epa.gov/tmdl/region-1-impaired-waters-and-303d-lists-state>

Impairment(s)			
<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			
TMDL(s)			
<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 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 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:

The Town is working on completing Phase I of system mapping. Due to COVID impacts and staffing levels, the Town is executing a contract with a third party consultant to complete elements that were not completed for the Phase I mapping.

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:

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:

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:

The Town of Dracut did not install any structural BMP's within the permit term from year 1 to year 2.

Solids, Oil and Grease (Hydrocarbons), or MetalsAnnual 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:

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

Part III: Receiving Waters/Impaired Waters/TMDL

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

- Yes
- No

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

Part IV: Minimum Control Measures

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

MCM1: Public Education

Number of educational messages completed **during this reporting period**: 20

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

BMP: Proper Disposal of Dog waste

Message Description and Distribution Method:

Leave no pile behind! Be sure to clean up after your pet. Clean up your pet's waste, protect our public waters, drinking water supply, and your health

Targeted Audience: Residents

Responsible Department/Parties: Town Clerk's office

Measurable Goal(s):

1,659 brochures were distributed with every dog license.

Message Date(s): January and is available throughout the year.

Message Completed for: Appendix F Requirements Appendix H Requirements

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

If yes, describe why the change was made:

This BMP was not proposed in our NOI, but it is a practice that has been executed by the Town Clerk's office.

BMP: Lawn and Leaf Disposal/Compost Dates

Message Description and Distribution Method:

The message described the dates that the DPW's Compost facility was open for lawn, leaf, and brush drop off. These dates also reflect the dates that compost is available to residents for pick up. This message is televised via Dracut Access T.V at the Board of Selectman's Meetings.

Targeted Audience: Residents

Responsible Department/Parties: DPW Operations

Measurable Goal(s):

The Compost site is open 31 Saturday's during the reporting period for residents to properly dispose of their leaves, brush, and grass clippings. The compost site is also open year round for residents Monday-Friday from

7:30 AM - 3:00 PM (except on Sunday's and Holiday's) as long as weather permits.

Message Date(s): 7/16/19, 8/13/19, 9/10/19, 9/24/19, 10/8/19, 10/22/19, 11/7/19, 3/10/20, 4/21/20, 5/4/20, 5/12/20, 6/9/20, 6/23/20, 6/26/20

Message Completed for: Appendix F Requirements Appendix H Requirements

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

If yes, describe why the change was made:

BMP:Dog Signage and Waste Management Stations

Message Description and Distribution Method:

Pet waste management signage and waste bags are installed in high traffic areas where there is heavy volume for dog walking. There are also waste barrels along the pathways for easy waste disposal.

Targeted Audience: Residents

Responsible Department/Parties: DPW Operations

Measurable Goal(s):

6,000 dog waste bags were ordered and installed in stations between July 1, 2019 - June 30, 2020.

Message Date(s): Year round are the following locations: Monahan Park, Beaver Brook Trail, and Dillion McAnespie Park.

Message Completed for: Appendix F Requirements Appendix H Requirements

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

If yes, describe why the change was made:

This message is an additional BMP conducted by the Town of Dracut, not reported in the NOI.

BMP:Resident Messaging: Stormwater Pollution is trash, oil, cigarette butts, and dog waste.

Message Description and Distribution Method:

Think Blue Massachusetts "Fowl Water" video (<https://www.thinkbluemassachusetts.org/>) advertisement on Facebook and Youtube.

Targeted Audience: Residents

Responsible Department/Parties: MA Statewide Municipal Stormwater Coalition

Measurable Goal(s):

91,717 impressions in Dracut and over 13 million impressions across Massachusetts.

Message Date(s): June 2020

Message Completed for: Appendix F Requirements Appendix H Requirements

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

If yes, describe why the change was made:

This was a Northern Middlesex Stormwater Collaborative Educational Advertisement Campaign not initially proposed into the NOI, but was executed through a grant.

BMP:Top 10 Ways To Be a Good Septic Owner

Message Description and Distribution Method:

A flyer explaining the top 10 ways to be a good septic owner was mailed out to all of the residents who own septic tanks in the the Town of Dracut.

Targeted Audience: Residents

Responsible Department/Parties: DPW Operations

Measurable Goal(s):

307 residents

Message Date(s): June 29, 2020

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:

It was not proposed in the NOI, but was a requirement of year 2 goals.

BMP:Resdient Messaging: Stormwater Pollution is trash, oil, cigarette butts, and dog waste.

Message Description and Distribution Method:

Think Blue Massachusetts "Fowl Water" video (<https://www.thinkbluemassachusetts.org/>) advertisement on Facebook and Youtube.

Targeted Audience: Residents

Responsible Department/Parties: MA Statewide Municipal Stormwater Coalition

Measurable Goal(s):

39,307 impressions in Dracut and over 7 million impressions across Massachusetts

Message Date(s): July 2019

Message Completed for: Appendix F Requirements Appendix H Requirements

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

If yes, describe why the change was made:

This was a Northern Middlesex Stormwater Collaborative Educational Advertisement Campaign not initially proposed into the NOI, but was executed through a grant.

Add an Educational Message

MCM2: Public Participation

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

The Stormwater Permitting Authority (SWPA) has held public participation meetings where residents are able to comment on the development and the SWMP working document. The SWPA has met 7 times between July 1, 2019 - June 30, 2020.

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

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

MCM3: Illicit Discharge Detection and Elimination (IDDE)

Sanitary Sewer Overflows (SSOs)

Check off the box below if the statement is true.

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

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

Number of SSOs identified: 0

Number of SSOs removed: 0

MS4 System Mapping

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:

The Town is working to execute a contract with a third party vendor to complete the following Phase I mapping: Interconnections.

With regards to municipally-owned stormwater treatment structures, it is labeled within the GIS as Town of Dracut properties, so the attribute will be changed to reflect the type of structure it is. With regards to the waterbodies being identified by name and indication of all use impairments, this layer will need to be turned on for the public viewing map on the Town's website.

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:

<https://www.dracutma.gov/node/61203/news>

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

Number of 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:

*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.

- 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 the reporting period:**

The Town of Dracut will annually offer employees IDDE Training. The Town of Dracut participated in the CMRSWC IDDE Training Workshop on May 7, 2020.

*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: 19

Number of enforcement actions taken: 0

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

These numbers reflect the number performed by the Engineering and Stormwater Department.

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:

Under site-plan review, The Town of Dracut requires all development - new and/or redevelopment to submit As-built drawings. "As-built plans shall be provided upon completion of the project and prior to the receipt of an occupancy permit. As-built plans shall be prepared in accordance with requirements of the Rules and Regulations governing the Subdivision of Land in Dracut, MA, as amended."

Street Design and Parking Lots Report

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

The Dracut Planning Board recently adopted new subdivision rules and regulations for the community. One of the key changes was allowing proposed streets to be less than 30' in width, which was the requirement in the former regulations. The new regulations allow for the Planning Board to allow for a street width of down to 24' in width, resulting in much less stormwater generated from the street and less infrastructure to address

the street drainage. Additionally, the site plan review process references these new subdivision rules and regulations for guidance on how to address stormwater and other facets of stormwater drainage and mitigation. Large parking lots are required to meet stormwater standards and mitigation options noted in these new subdivision rules and regulations. The new regulations allow for more flexibility and options and are available at the Engineering and Planning Department and at the Middlesex North Registry of Deeds, Book 34472, page 1. The new rules and regulations were adopted on August 10, 2020.

Green Infrastructure Report

Describe the status of the green infrastructure report due in year 4 of the permit term, including the findings and progress towards making the practice allowable:

The Dracut Planning Board recently adopted new subdivision rules and regulations for the community. One of the key changes was allowing Low Impact Development options to address stormwater treatment. Additionally, the site plan review process references these new subdivision rules and regulations for guidance on how to address stormwater in a much more creative manner than past regulations have allowed. The new regulations allow for more flexibility and options and are available at the Engineering and Planning Department and at the Middlesex North Registry of Deeds, Book 34472, page 1. The new rules and regulations were adopted on August 10, 2020.

Retrofit Properties Inventory

Describe the status of the inventory, due in year 4 of the permit term, of permittee-owned properties that could be modified or retrofitted with BMPs to mitigate impervious areas and report on any properties that have been modified or retrofitted:

The Town has a one property that has been retrofitted during this permit term to mitigate impervious area, Hovey Park Extension and is in the process of finalizing retrofitting construction to mitigate another site in Town; Boule Park. The Town is currently working to identifying additional permittee-owned properties to mitigate.

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: 3,800

Number of catch basins cleaned: 555

Total volume or mass of material removed from all catch basins: 75.14 tons

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

Total number of catch basins: 3,800

If applicable:

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

Each catch basin sump that is more than 50% full during two consecutive routine inspections/cleaning events are prioritized to be cleaned prior to a rain event.

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: cubic yards
- Weight of material removed: 366.81 tons

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: 1

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

A draft SWPPP has been produced by a consulting firm with a list of recommendations to be conducted within the determined time frame.

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 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:

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: Title:

Signature: Date:

[Signatory may be a duly authorized representative]