

# **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 type="checkbox"/> Bacteria/Pathogens                                    | <input type="checkbox"/> Chloride                                      | <input type="checkbox"/> Nitrogen                         | <input 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 checked="" type="checkbox"/> Bacteria and Pathogen | <input type="checkbox"/> Cape Cod Nitrogen |
|                                                                                | <input checked="" 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 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:

### 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:

<http://www.needhamma.gov/323/Stormwater-Management>

- ☒ 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:

SWPPPs for the Recycling and Transfer Station and Public Works Yard is under final review and is anticipated to be posted for public comment 4th quarter 2021 due to COVID-19 scheduling challenges.

## **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:

### **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:

Needham has approved additional capital funding to hire a contractor to perform a one-time complete catch 1 basin cleaning throughout town in a single round to facilitate the determination if there are any catch basins that are likely to require more frequent cleaning (>50% full) outside of the predetermined cleaning route. The current internal catch basin cleaning program addresses approximately 50% of town-wide catch basins per year on a rotating cleaning schedule. This effort will help to identify those catch basins that may require more frequent cleaning and/or areas that may benefit from additional mitigation efforts resulting in improved stormwater management. Due to COVID-19 staffing and local impacts, this project is being scheduled for the upcoming fiscal year.

### **Charles River Watershed Phosphorus TMDL**

- ☒ Completed the funding source assessment

*Optional:* If you would like to describe progress made on any incomplete requirements listed above or provide any additional details, please use the box below:

Needham has an approved Phosphorus Control Plan (PCP) that is incorporated into our stormwater bylaw that includes measures to promote infiltration and prevent pollutants, including phosphorus, from entering the Town's MS4.

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

Brooks & Culvert Maintenance contract is proposed to be initiated by the end of 2021.



### **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:**

*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:Management of Pet Waste**

Message Description and Distribution Method:

Proper care and disposal of pet waste and the environmental impacts of not conforming to Needham's bylaw 3.7.7. Brochure available on website and provided to each resident with request for pet licensing/renewal.

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

Facebook (4,889); Twitter (3,039); Brochures available at Public Works and Town Clerk for Public; Website

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:

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#### **BMP:Septic System Care**

Message Description and Distribution Method:

Distributed to all new applicants for septic system in town. Describes the proper care and maintenance of a septic system.

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

Distributed with Septic System Permits and Certificate of Completions; Brochures available at Health Department

Message Date(s): 7/1/2020 - 6/30/2021

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:

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**BMP:Lawn and Garden Tips**

Message Description and Distribution Method:

Proper use of chemicals such as fertilizer and pesticides including Think Blue Massachusetts messages and Greenscapes.

Targeted Audience: Residents

Responsible Department/Parties: DPW Operations

Measurable Goal(s):

Facebook (4,114); Twitter (4,669)

Message Date(s): 1/11/2021, 3/3/2021, 5/13/2021, 5/25/2021, 6/21/2021, 6/29/2021

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:

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**BMP:Leaf Collection and Disposal**

Message Description and Distribution Method:

Posted on Facebook, Twitter and on Town Website. Proper disposal and care of leaves during fall clean-up and throughout the season.

Targeted Audience: Residents

Responsible Department/Parties: DPW Operations

Measurable Goal(s):

Facebook (2,509); Twitter (3,333); Website

Message Date(s): 11/1/2020, 11/6/2020, 11/13/2020, 11/27/2020

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:

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**BMP: Street Sweeping**

Message Description and Distribution Method:

Sweeping paved surfaces reduces debris that washes into the storm water drain system.

Targeted Audience: Residents

Responsible Department/Parties: DPW Operations

Measurable Goal(s):

Facebook (299); Twitter (319)

Message Date(s): 3/17/2021

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:

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**BMP:Paint Surplus Days**

Message Description and Distribution Method:

RTS acceptance of paint surplus supplies to for re-use and recycling.

Targeted Audience: Residents

Responsible Department/Parties: DPW Operations

Measurable Goal(s):

Twitter (3,853), Facebook (5,325)

Message Date(s): 7/14/2020, 7/17/2020, 9/14/2020, 9/18/2020, 4/5/2021, 5/14/2021, 6/2/2021

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:

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**BMP:Household Hazardous Waste Day**

Message Description and Distribution Method:

Information about the hazardous materials accepted at the RTS on this annual collection day. Materials are collected and removed by a contractor for proper handling and disposal.

Targeted Audience: Residents

Responsible Department/Parties: DPW Operations

Measurable Goal(s):

Twitter (2,817), Facebook (2,537)

Message Date(s): 9/25/2020, 9/29/2020, 10/7/2020, 10/9/2020, 10/16/2020

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:

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**BMP:Clear-a-Basin**

Message Description and Distribution Method:

Communication regarding the importance of keeping catch basins clear of debris.

Targeted Audience: Residents

Responsible Department/Parties: DPW Operations

Measurable Goal(s):

Twitter (9,124), Facebook (6,606)

Message Date(s): 8/4/2020, 9/28/2020, 10/19/2020, 10/28/2020, 10/29/2020, 11/30/2020, 12/31/2020, 1/13/2021, 2/22/2021, 3/25/2021

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:

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**BMP: Street Sweeping**

Message Description and Distribution Method:

Sweeping paved surfaces reduces debris that washes into the storm water drain system.

Targeted Audience: Businesses, institutions and commercial facilities

Responsible Department/Parties: DPW Operations

Measurable Goal(s):

Facebook (299); Twitter (319)

Message Date(s): 3/17/2021

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:Clear-a-Basin**

Message Description and Distribution Method:

Communication regarding the importance of keeping catch basins clear of debris.

Targeted Audience: Businesses, institutions and commercial facilities

Responsible Department/Parties: DPW Operations

Measurable Goal(s):

Twitter (9,124), Facebook (6,606)

Message Date(s): 8/4/2020, 9/28/2020, 10/19/2020, 10/28/2020, 10/29/2020, 11/30/2020, 12/31/2020,  
1/13/2021, 2/22/2021, 3/25/2021

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:

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**BMP: Keep it Clean**

Message Description and Distribution Method:

Communicating the importance of reducing litter in public spaces therefore reducing debris in catch basins.

Targeted Audience: Residents

Responsible Department/Parties: Parks/Recreation

Measurable Goal(s):

Facebook (320); Twitter (724)

Message Date(s): 7/17/2020

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:

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**BMP: Arbor Day Tree Planting**

Message Description and Distribution Method:

Communications about the tree planting efforts of Parks & Forestry, including help from the community. The goal of more deep rooted plant life that contributes to infiltration.

Targeted Audience: Residents

Responsible Department/Parties: Parks/Recreation

Measurable Goal(s):

Facebook (5,441); Twitter (1,714)

Message Date(s): 4/20/2021, 5/3/2021

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:

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**BMP: Think Blue Massachusetts: Fowl Water**

Message Description and Distribution Method:

On behalf of the members of the Charles River Stormwater Collaborative, Think Blue Massachusetts ran an educational advertising campaign. The “Fowl Water” advertisement helps viewers visualize stormwater pollution from motor oil, pet waste, and trash become stormwater pollution.

Targeted Audience: Residents

Responsible Department/Parties: DPW Operations

Measurable Goal(s):

Facebook/Instagram (11,401); YouTube Ad (26,977); Spanish Language (5,411)

Message Date(s): 5/17/2021-6/4/2021

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:

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**BMP: Think Blue Massachusetts: Fowl Water**

Message Description and Distribution Method:

On behalf of the members of the Charles River Stormwater Collaborative, Think Blue Massachusetts ran an educational advertising campaign. The “Fowl Water” advertisement helps viewers visualize stormwater pollution from motor oil, pet waste, and trash become stormwater pollution.

Targeted Audience: Businesses, institutions and commercial facilities

Responsible Department/Parties: DPW Operations

Measurable Goal(s):

Facebook/Instagram (11,401); YouTube Ad (26,977); Spanish Language (5,411)

Message Date(s): 5/17/2021-6/4/2021

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:

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**BMP: Think Blue Massachusetts: Fowl Water**

Message Description and Distribution Method:

On behalf of the members of the Charles River Stormwater Collaborative, Think Blue Massachusetts ran an educational advertising campaign. The “Fowl Water” advertisement helps viewers visualize stormwater pollution from motor oil, pet waste, and trash become stormwater pollution.

Targeted Audience: Industrial facilities

Responsible Department/Parties: DPW Operations

Measurable Goal(s):

Facebook/Instagram (11,401); YouTube Ad (26,977); Spanish Language (5,411)

Message Date(s): 5/17/2021-6/4/2021

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:

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**BMP: Think Blue Massachusetts: Fowl Water**

Message Description and Distribution Method:

On behalf of the members of the Charles River Stormwater Collaborative, Think Blue Massachusetts ran an educational advertising campaign. The “Fowl Water” advertisement helps viewers visualize stormwater pollution from motor oil, pet waste, and trash become stormwater pollution.

Targeted Audience: Developers (construction)

Responsible Department/Parties: DPW Operations

Measurable Goal(s):

Facebook/Instagram (11,401); YouTube Ad (26,977); Spanish Language (5,411)

Message Date(s): 5/17/2021-6/4/2021

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

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

If yes, describe why the change was made:

Add an Educational Message

## MCM2: Public Participation

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

The written Stormwater Management Program (SWMP) was completed September 23, 2019 and posted to the town website on September 27, 2019 for a public review and comment period of 60 days. Needham did not receive any public comments to the SWMP during the comment period.

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:**

Public participation opportunities for this reporting period included:

April 2021: CRWA Run of the Charles

Saturdays April - September: RTS Paint Collection

10/17/2020: RTS Household Hazardous Waste Day

Sundays October: RTS Leaf Collection

4/30/2021: Arbor Day Tree distribution (Park and Recreation) and UTube video on how to plant a tree (Parks & Forestry)

4/22/2021-4/24/2021: Spring 2021 Townwide Cleanup (with COVID-19 socially distant protocols)

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

### Sanitary Sewer Overflows (SSOs)

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

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

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

Number of SSOs identified:

Number of SSOs removed:

### MS4 System Mapping

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

### **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:

<https://www.needhamma.gov/323/Stonewater-Management>

*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:

Outfalls have been dry weather screened and sampled - waiting lab wet weather results, wet weather testing is ongoing. A contract for CCTV investigations is being developed and is expected to be awarded by the Spring of 2022.

### **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:

<https://www.needhamma.gov/323/Stonewater-Management>

*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:

Catchment investigations are conducted as part of the current CCTV inspection program to identify illicit connections. The CCTV inspection program is an ongoing program to inspect 10% of the

Town's drainage system every year. The program has proven to be successful in identifying illicit connections and in the future will use composite sampling results to target inspection efforts. Due to equipment issues and COVID-19 staffing, Needham has begun an outsourcing effort to supplement our in-house capabilities until equipment and staffing situations can be resolved.

### **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:

<https://www.needhamma.gov/323/Stormwater-Management>

*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:*

Illicit discharges identified and were removed prior to this permit effective date.

### **Employee Training**

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

Employee training is provided via recorded video training for employees of DPW Divisions to take once per year.

*Below, report on the construction site plan reviews, inspections, and enforcement actions completed **during this reporting period**.*

Number of site plan reviews completed: 108

Number of inspections completed: 17

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: 749

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

Needham's Stormwater By-law states:

#### **7.7.3.7 As-Built Drawing**

Except as provided for in Section 7. 7 .3 .4, as-built drawings stamped by a Massachusetts Registered Professional Engineer showing all stormwater management systems shall accompany the as-built Plot Plan at the completion of a project.

Additionally, Planning Board and Zoning Board decisions require an as-built to be submitted.

### **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:

Needham is reviewing street design and parking lot regulations and guidelines for stormwater management opportunities for year 4 of the permit term.

### **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:

Green infrastructure is a component of Total Watershed Management of which Needham is actively pursuing. Our commitment to Total Watershed Management is included in the SWMP. We continue to develop and encourage green infrastructure through land use and water management principles. The full report is anticipated in year 4 of the permit term.

### **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:

Needham contracted with the engineering firm BETA to develop an inventory of properties that have existing and proposed BMPs as part of the Watershed Management Plan. That inventory is being reviewed and investigated for viable opportunities for additional BMPs. Determinations are anticipated in year 4 of the permit term.

## **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: 1,813

Number of catch basins cleaned: 1,813

Total volume or mass of material removed from all catch basins: 471 cubic yards

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

Total number of catch basins: 4,300

*If applicable:*

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

If a catch basin is reported to have been >50% full during two consecutive events, the basin will be flagged for review by the Water and Sewer Division for additional investigation as to the root cause of the excessive volume of material. Appropriate mitigation efforts will be made to augment the basin, area or drain as applicable to reduce the level of material present at the next scheduled inspection/cleaning event. As a second line of defense, the drain is inspected with CCTV and flushed of any excessive sediment. Needham also has a brook and culvert program designed to catch large amounts of sediment that may have been missed through catch basin cleaning and drain flushing efforts. Should such mitigation efforts result in no significant change in volume of material, the catch basin will be flagged for additional inspections/cleanings on a more frequent basis to be determined by the Water and Sewer Division.

**Street Sweeping**

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

- ☐ Number of miles cleaned:
- ☐ Volume of material removed:  [Select Units]
- ☒ Weight of material removed:  tons

**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:

SWPPPs for the Recycling and Transfer Station and Public Works Yard is under final review and is anticipated to be posted for public comment 4th quarter 2021 due to COVID-19 scheduling challenges.

**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:

The Town of Needham was closed due to the COVID-19 pandemic for approximately 1.5 months and a rotating shift was created to minimize the spread of the virus. This resulted in a slow down of stormwater tasks. This did not eliminate any of the work items, it only reduced the rate of progress on all items.

### **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:

Needham confirms that our documentation will be updated to comply with all applicable permit requirements including but not limited to the year 4 requirements summarized above to the Maximum Extent Practicable.

## 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.

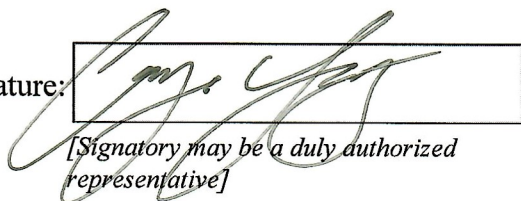
Name:

Carys Lustig

Title:

Director, Public Works

Signature:

  
*[Signatory may be a duly authorized representative]*

Date:

9/28/2021