

Year 2 Annual Report
Massachusetts Small MS4 General Permit
New Permittees
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:

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

*Check off all requirements below that have been completed. **By checking each box you are certifying that you have completed that permit requirement fully.** If you have not completed a requirement leave the box unchecked. Additional information will be requested in later sections.*

Annual Requirements

- Provided an opportunity for public participation in review and implementation of SWMP and complied with State Public Notice Requirements
- Kept records relating to the permit available for 5 years and made available to the public
- Properly stored and disposed of catch basin cleanings and street sweepings so they did not discharge to receiving waters

Optional: If you would like to describe progress made on any incomplete requirements listed above, provide any additional information for your self-assessment, 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:

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? 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>

- Yes
 No

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

Devens made updates to its list of outfalls during Permit Year 2 as more information regarding outfall ownership and regulated status became available. The most recent list of regulated outfalls and their associated receiving water is included in the SWMP. There have been no changes in the list of impairments applicable to Devens since the NOI was filed.

Part IV: Minimum Control Measures

Part IV includes some of the metrics that will be required in upcoming annual reports. For this annual report, these metrics are optional for new permittees; please fill out any of the metrics below that you have started within this reporting period. Then, proceed to Part V.

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: Web Page

Message Description and Distribution Method:

The Devens Community website has been updated to provide public access to stormwater-related materials, documentation, and procedures. The website now includes general information on stormwater management, the MS4 Permit, direct links to Devens' stormwater regulations, and more specific educational information for each targeted audience. Educational information specific to residents includes a Home Composting Guide, a list of Low-Impact Development Techniques for Stormwater Management, a Stormwater Pollution Prevention Guide, and winter tips for watershed protection. There is also a link to educational information provided by ThinkBlue Massachusetts. The Devens Community website is at the following location: <https://www.devenscommunity.com/stormwater>. Similar information continued to be posted on the Devens Enterprise Commission's webpage, under the "Living Green: Resources for Devens Residents and Businesses" subheading: <http://www.devensec.com/residents.html>

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

The website was maintained during Permit Year 2 and will remain for the duration of the permit term. Devens is working to develop a way to track interactions with the stormwater 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:

BMP: Web Page/Newsletter

Message Description and Distribution Method:

Devens uploaded a flyer outlining proper disposal of yard waste, including grass clippings and leaf litter, to

the stormwater website. The flyer is available to the general public year-round at the following location: https://devenscommunity.com/sites/default/files/stormwater/Disposal_of_Yard_Waste_Nov_2018.pdf. A message regarding proper yard waste and leaf litter disposal was also included in the weekly newsletter posted on the Devens Community website in the fall of 2019.

Targeted Audience: Residents

Responsible Department/Parties: MassDevelopment (Operations/Engineering)

Measurable Goal(s):

This message was maintained for the duration of Permit Year 2 and will remain for the duration of the permit term. Devens is working to develop a way to track interactions with the stormwater website.

Message Date(s): FY2020

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: Web Page/Newsletter

Message Description and Distribution Method:

Devens posted a flyer entitled "Do You Doody for Clean Water" to the stormwater website to educate both residents and other members of the Devens community on the importance of picking up pet waste. This flyer is posted at the following location: https://devenscommunity.com/sites/default/files/stormwater/pet_waste_flyer.pdf. A message relating to proper pet waste management was also included in the weekly newsletter on the Devens Community website on the week of July 10, 2020: <https://cm.massdevelopment.com/t/d-39A27E967511C9CD2540EF23F30FEDED>

Targeted Audience: Residents

Responsible Department/Parties: MassDevelopment (Operations/Engineering)

Measurable Goal(s):

This flyer was maintained for the duration of Permit Year 2 and will remain for the duration of the permit term. Devens is working to develop a way to track interactions with the stormwater website.

Message Date(s): FY2020

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: Web Page/Handout

Message Description and Distribution Method:

The Devens Enterprise Commission continued to maintain stormwater-related materials, documentation, regulations, and procedures on their website during the reporting period. All regulations specific to developers and industrial facilities are easily accessible on the "Development Services" page of the DEC website: <http://www.devensec.com/devserv.html>. Additional information continued to be provided on the "Sustainable Devens" page: <http://www.devensec.com/sustain.html>, and the DEC's Green Infrastructure Guidelines were posted to the website as well as distributed to some prospective developers in person: http://www.devensec.com/development/Green_Infrastructure_Guidelines_Final_8-12-14.pdf

Targeted Audience: Developers (construction), Industrial facilities

Responsible Department/Parties: MassDevelopment (Operations/Engineering)/Devens Enterprise Commission

Measurable Goal(s):

By continuing to make this information available on its website, Devens informs potential developers of the environmental requirements associated with construction in the Devens Enterprise Zone, raising awareness of Low-Impact Development and Green Infrastructure practices. The Green Infrastructure Guidelines handout was distributed to 12 prospective developers during the reporting period.

Message Date(s): FY2020

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: Flyer

Message Description and Distribution Method:

A flyer regarding proper pet waste management was distributed with dog license issuances and renewals during the reporting period. Pet waste bags were also distributed to encourage residents to pick up after their pets.

Targeted Audience: Residents

Responsible Department/Parties: MassDevelopment (Operations/Engineering)

Measurable Goal(s):

A flyer and pet waste bag was distributed to each resident who applied for or renewed a dog license during the reporting period. The exact number of flyers and bags distributed is unknown.

Message Date(s): FY2020

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 updated SWMP is posted to the Devens Enterprise Commission website and is available for public review. Once submitted, this Annual Report will be appended to the SWMP and the online copy will be updated. The SWMP is a living document, and comments on the SWMP are welcome by the public. The SWMP will continue to be modified annually to document initiatives undertaken to comply with the permit and address any comments received from the public.

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:**

Devens continued to provide public access to the recycling drop-off at the DPW facility and to provide access to the Regional Household Hazardous Products Collection Center during the reporting period, encouraging residents and business owners to properly handle all hazardous waste leaving their property. Yard waste was again collected on a weekly basis between April 1st and November 30th during the reporting period. Devens also continued to participate in the Eco-Efficiency Center, providing programs to assist local businesses in reducing the amount of waste they generate and the associated disposal costs.

Due to the impacts of COVID-19, the annual Earth Day clean-up event was not held during the reporting period. Organized clean-up events will resume during Permit Year 3 assuming it is safe to do so.

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:

*Below, report on the total number of SSOs identified in the MS4 system and removed to date. At a minimum, report SSOs identified **since the effective date of the permit (July 1, 2018).***

Total number of SSOs identified: Total 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

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

Devens continued to update the ownership and regulated status of its MS4 infrastructure, clarifying which areas are under the jurisdiction of the Massachusetts Development Finance Agency and therefore regulated under the MS4 Permit, which are under the control of the Army and therefore regulated by their MS4 Permit, and which infrastructure is owned and operated by private entities. All changes to outfall ownership status have been reflected in the SWMP.

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:

Devens will complete dry weather outfall screening by June 30, 2022, as required for new permittees under the MS4 Permit.

*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:

*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:

Devens has developed a draft catchment prioritization and ranking as well as draft catchment investigation procedures which will be finalized in Permit Year 3 along with the IDDE Plan. After dry-weather outfall screening and sampling has been completed, the catchments will be reprioritized, and catchment investigations will proceed according to permit requirements. Devens is also in the process of finalizing its System Vulnerability Factor analysis for each catchment. This analysis will be completed during Permit Year 3 and included in the Year 3 annual report submission.

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

*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 if conducted **during this reporting period**:

Devens will begin to conduct training on the IDDE program and Good Housekeeping/Pollution Prevention after the written IDDE plan is finalized in Permit Year 4.

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:

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

Ordinance Development

Describe the status of the post-construction ordinance required to be complete by year 3 of the permit term:

While Devens' existing regulatory mechanisms meet the requirements of Section 2.3.6 of the MS4 Permit as it relates to Low-Impact Development, BMP design guidance, the submission of as-built plans, and long-term operation and maintenance of stormwater management systems, the regulations require further updates to meet the Permit requirements for stormwater management standards for new development and redevelopment, and the necessary requirements for phosphorus impaired waters. Updates to 974 CMR 4.08, the applicable regulatory mechanism, were drafted during Permit Year 2 to bring Devens' regulations into compliance with the Permit. The updated language is currently under review and will be enacted by the end of Permit Year 3.

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:

Devens' existing regulations require the submission of as-built drawings at the completion of construction and require long term operation and maintenance plans for on-site stormwater management systems to be submitted prior to project approval. As the existing measures meet permit requirements, they will not be modified during Permit Year 3.

Street Design and Parking Lots Report

Describe the status of the street design and parking lots assessment including any planned or completed changes to local regulations and guidelines:

Devens continues to incorporate LID practices for all public and private stormwater management projects where feasible. The Devens Enterprise Commission has parking maximums, not minimums, in place, as well as a Transportation Demand Management program to reduce parking. Also 974 CMR 2.07, Street Design Standards, includes additional street types to reduce pavement and support LID. Sustainable indicators, such

as impervious surface reductions from the incorporation of LID on private development projects, are monitored and tracked. Devens will develop the required street design and parking lots assessment report in Permit Year 4, as allowed by the extended deadlines for new permittees outlined in Section 1.10.3 of the permit.

Green Infrastructure Report

Describe the status of the green infrastructure report, including the findings and progress towards making the practice allowable:

Devens continues to utilize and improve on green infrastructure guidelines to guide, regulate and incentivize green infrastructure on all development and redevelopment projects: http://www.devensec.com/development/Green_Infrastructure_Guidelines_Final_8-12-14.pdf. Impervious surface reductions in Devens are monitored in Sustainable Indicators Reports, and LID practices are required for stormwater management projects where feasible. Devens will develop the required green infrastructure report in Permit Year 4, as allowed by the extended deadlines for new permittees outlined in Section 1.10.3 of the permit.

Retrofit Properties Inventory

Describe the status of the inventory 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:

Devens will begin to assemble the retrofit properties inventory in Permit Year 6, as outlined in the SWMP, and as required in the permit for new permittees. Many retrofit projects implemented to date, including road diets on Pine Road, Grant Road, Hospital Road, Lovell Street, the Bristol-Myers Squibb (BMS) parking structure, and at the military redevelopment on Barnum Road; porous pavement at CMTC and Tara Vista; and other LID projects have mitigated impervious area within the Devens Enterprise Zone.

MCM6: Good Housekeeping

Catch Basin Cleaning

Describe the status of the catch basin cleaning optimization plan:

See "Additional Information" field below.

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:

N/A

*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:

As mentioned in the "Additional Information" section below, Devens is still in the process of collecting the data necessary to complete its catch basin optimization plan. Once complete, this plan will include procedures for actions to be taken if a catch basin sump is more than 50% full during two consecutive routine inspections or cleanings.

Street Sweeping

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

Devens currently sweeps all public streets and municipal parking lots in the early spring, and then an average of once every 4 weeks, as needed. Devens will begin compiling its written Operation and Maintenance (O&M) Plan for municipal properties and activities in September 2020. This overarching O&M Plan will include written procedures for sweeping streets and municipally-owned lots, and will be complete within 4 years of the permit effective date.

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:

Devens also sweeps rural, uncurbed roadways with no catch basins. Sweeping of these streets will be documented in the standard operation and maintenance procedures developed for municipal facilities and activities in Permit Year 4.

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

Winter Road Maintenance

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

Devens will develop the winter road maintenance procedures within 3 years of the permit effective date.

Stormwater Pollution Prevention Plan (SWPPP)

Describe the status of any SWPPP 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:

Devens is working to develop a SWPPP for the DPW Facility and Devens Regional Household Hazardous Products Collection Center, which are on the same parcel. A preliminary site inspection was scheduled for the spring of 2020, however it was postponed due to the impacts of COVID-19. This SWPPP, as well as any other SWPPPs determined to be necessary, will be complete within 4 years of the permit effective date.

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:

N/A

O&M Procedures for Stormwater Treatment Structures

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

Devens has existing procedures for stormwater treatment structure maintenance, which will be reviewed and optimized to ensure compliance with the 2016 MS4 Permit as part of the development of the overall written Operation and Maintenance Plan.

Part V: 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:

Devens collected data during the 2019 and 2020 cleaning seasons as part of their optimization plan to ensure that no catch basin is more than 50% full. Data collected includes depth from the catch basin rim to the top of sediment, to the bottom of the basin, and to the invert of the outlet pipe. Devens will continue to collect data as needed until data is available for all catch basins. This data will be integrated into the Devens Drainage GIS and utilized to identify which catch basins are filling up more frequently and will therefore need to be cleaned more than once annually to ensure that the catch basin sump is never more than 50% full.

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

- Complete IDDE ordinance
- Complete Construction/ Erosion and Sediment Control (ESC) ordinance
- Develop written procedures for site inspections and enforcement of sediment and erosion control measures
- Develop written procedures for site plan review

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
- Continue public education and outreach program

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

Part VI: 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:

John P. Marc-Aurele

Title:

Director of Engineering and Transp

Signature:



Date:

9/28/20

[Signatory may be a duly authorized representative]