

**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:

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>

**Impairment(s)**

Bacteria/Pathogens       Chloride       Nitrogen       Phosphorus  
 Solids/ Oil/ Grease (Hydrocarbons)/ Metals

**TMDL(s)**

*In State:*       Assabet River Phosphorus       Bacteria and Pathogen       Cape Cod Nitrogen  
 Charles River Watershed Phosphorus       Lake and Pond Phosphorus

*Out of State:*       Bacteria/Pathogens       Metals       Nitrogen       Phosphorus

Clear Impairments and TMDLs

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

### Year 2 Requirements

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

*Optional:* If you would like to describe progress made on any incomplete requirements listed above, provide any additional information, and/or if any of the above year 2 requirements could not be completed due to the impacts of COVID-19, please identify the requirement that could not be completed, any actions taken to attempt to complete the requirement, and reason the requirement could not be completed below:

Please see Attachment No. 1, attached to the Year 2 Annual Report submission e-mail.

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:

Please see Attachment No. 1, attached to the Year 2 Annual Report submission e-mail.

**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:

Please see Attachment No. 1, attached to the Year 2 Annual Report submission e-mail.

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

Annual Requirements

*Public Education and Outreach\**

- Distributed an annual message in the spring (April/May) that encourages the proper use and disposal of grass clippings and encourages the proper use of slow-release fertilizers
- Distributed an annual message in the summer (June/July) encouraging the proper management of pet waste, including noting any existing ordinances where appropriate
- Distributed an annual message in the fall (August/September/October) encouraging the proper disposal of leaf litter

*\* Public education messages can be combined with other public education requirements as applicable (see Appendix H and F for more information)*

*Good Housekeeping and Pollution Prevention for Permittee Owned Operations*

- Increased street sweeping frequency of all municipal owned streets and parking lots subject to Permit part 2.3.7.a.iii.(c) to a minimum of two times per year (spring and fall)

*Potential structural BMPs*

Any structural BMPs listed in Table 3 of Attachment 1 to Appendix H already existing or installed in the regulated area by the permittee or its agents was tracked and the nitrogen removal by the BMP was

- estimated consistent with Attachment 1 to Appendix H. The BMP type, total area treated by the BMP, the design storage volume of the BMP and the estimated nitrogen removed in mass per year by the BMP were documented.

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

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

Please see Attachment No. 1, attached to the Year 2 Annual Report submission e-mail.

*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:

Please see Attachment No. 2, attached to the Year 2 Annual Report submission e-mail.

## Part IV: Minimum Control Measures

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

### MCM1: Public Education

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

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

#### **BMP: Pet Waste Brochures/Pamphlets**

Message Description and Distribution Method:

An educational pamphlet titled "Scoop the Poop" was distributed via regular mail to residents during the annual census form / dog license renewal mailing.

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

The pamphlet was included in the annual census mailing distributed to all residents. The mailing was distributed in December 2019.

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:

Addition of pet waste box refills.

#### **BMP: Stormwater Pollution Prevention for Industrial Sites**

Message Description and Distribution Method:

Educate industrial facilities on stormwater pollution prevention, salt storage, employee training, spill prevention and response, erosion prevention, sediment control, and runoff management, dust control, and elimination of unauthorized non-stormwater discharges (illicit discharges). The pamphlet was distributed via regular mail to industrial facilities.

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

The pamphlet was distributed to all residents via regular mail. The mailing was distributed in November

2019.

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:[Message name here]**

Message Description and Distribution Method:

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

Message Date(s):

Message Completed for: Appendix F Requirements  Appendix H Requirements

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

If yes, describe why the change was made:

Add an Educational Message

**MCM2: Public Participation**

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

Please see Attachment No. 3, attached to the Year 2 Annual Report submission e-mail.

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

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

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

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

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

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

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

Number of SSOs identified:

Number of SSOs removed:

#### **MS4 System Mapping**

*Below, check all that apply.*

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

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

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

Please see Attachment No. 3, attached to the Year 2 Annual Report submission e-mail.

#### **Screening of Outfalls/Interconnections**

*If conducted, please submit any outfall monitoring results from this reporting period. Outfall monitoring results should include the date, outfall/interconnection identifier, location, weather conditions at time of sampling, precipitation in previous 48 hours, field screening parameter results, and results from all analyses.*

- The outfall screening data is attached to the email submission

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

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

Number of outfalls screened:

**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:

Please see Attachment No. 3, attached to the Year 2 Annual Report submission e-mail.

**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:

Number of illicit discharges removed:

Estimated volume of sewage removed:  gallons/day

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

Total number of illicit discharges identified:

Total number of illicit discharges removed:

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

**Employee Training**

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

Please see Attachment No. 3, attached to the Year 2 Annual Report submission e-mail.

**MCM4: Construction Site Stormwater Runoff Control**

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

Number of site plan reviews completed:

Number of inspections completed:

Number of enforcement actions taken:

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

Please see Attachment No. 3, attached to the Year 2 Annual Report submission e-mail.

**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:

Please see Attachment No. 3, attached to the Year 2 Annual Report submission e-mail.

### **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:

Please see Attachment No. 3, attached to the Year 2 Annual Report submission e-mail.

### **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:

Please see Attachment No. 3, attached to the Year 2 Annual Report submission e-mail.

### **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:

Please see Attachment No. 3, attached to the Year 2 Annual Report submission e-mail.

## **MCM6: Good Housekeeping**

### **Catch Basin Cleaning**

*Below, report on the number of catch basins inspected and cleaned, along with the total volume of material removed from the catch basins **during this reporting period.***

Number of catch basins inspected:

Number of catch basins cleaned:

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

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

Total number of catch basins:

*If applicable:*

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

**Street Sweeping**

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

Number of miles cleaned:

Volume of material removed:  [Select Units]

Weight of material removed:  [Select Units]

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

*Below, check all that apply.*

The following permittee-owned properties have been inventoried:

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

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

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

**Stormwater Pollution Prevention Plan (SWPPP)**

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

Number of site inspections completed:

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

N/A

### **Additional Information**

#### **Monitoring or Study Results**

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

- Not applicable
- The results from additional reports or studies are attached to the email submission
- The results from additional reports or studies can be found at the following website(s):

If such monitoring or studies were conducted on your behalf or if monitoring or studies conducted by other entities were reported to you, a brief description of the type of information gathered or received shall be described below:

N/A

#### **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:

Activities planned for Year 3 Annual Reporting Period are identified in Attachment Nos. 1 - 3, attached to the Year 2 Annual Report submission email.

## 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]*

## Attachment No. 1

### Part II: Self-Assessment

#### Year 2 Requirements

##### *Completed Phase I of system mapping*

All Phase I System Mapping items have been complete except for open channel conveyances. The Illicit Discharge Detection and Elimination (IDDE) Plan completed by CDM Smith in May 2020 for the Town of Marion (Town) includes the Phase I System Mapping. The Buzzards Bay Stormwater Collaborative (Collaborative) updated and mapped the catchment delineation and impaired waterbodies in the Year 2 Reporting Period.

##### *Developed a written catchment investigation procedure and added the procedure to the SWMP*

The Collaborative completed Geographic Information System (GIS) mapping of the Town's catchment system and impaired waters in June 2020. Written catchment investigation procedure will be developed and added to the SWMP in the Year 3 Reporting Period.

##### *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*

Stormwater Bylaws, including a requirement for submission of as-built drawings, have been drafted. The finalized Stormwater Bylaws will be submitted to the Board of Selectmen for review, adopted into the Town of Marion Bylaws, and included in SWMP. This will be completed in the Year 3 Reporting Period.

##### *Enclosed or covered storage piles of salt or piles containing salt used for deicing or other purposes*

A sand pile and sand / salt mixture pile are stored at the Department of Public Works (DPW) Maintenance Garage. These piles are currently covered with poly tarps. The Town intends to design and construct a new DPW complex, pending appropriation at the spring 2021 Annual Town Meeting. The new complex will provide appropriate materials storage.

##### *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*

A written Standard Operating Procedure (SOP) was developed for vehicles and equipment storage, operation, and washing in June 2019. Written SOPs for buildings, parks and open space will be developed and added to the SWMP in the Year 3 Reporting Period.

##### *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*

All permittee owned properties have been inventoried and included in the SWMP as of March 2020.



*Completed a written program for MS4 infrastructure maintenance to reduce the discharge of pollutants*

An Operations and Maintenance Program - Standard Operating Procedures, that includes procedures to maintain and reduce the discharge of pollutants, was completed by CDM Smith in June 2019.

*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*

Written SWPPPs for the DPW Maintenance Garage and Water Pollution Control Facility (WPCF) were completed by GAF Engineering, Inc., in the Year 3 Reporting Period (September 2020).

### Annual Requirements

*Provide an opportunity for public participation in review and implementation of SWMP and complied with State Public Notice requirements*

Opportunity for public review and comment of the SWMP was not provided in Year 2 due to the COVID-19 pandemic. Opportunity will be given in the Year 3 Reporting Period.

*Kept records relating to the permit available for 5 years and make available to the public*

All records are kept at the WPCF Office, located at 50 Benson Brook Road, Marion, MA.

*The SSO inventory has been updated, including the status of mitigation and corrective measures implemented*

No new SSOs were reported during the Year 2 Reporting Period.

*Properly stored and disposed of catch basin cleanings and street sweepings so they did not discharge to receiving waters*

Catch basin cleanings and street sweepings are stored at the DPW yard. There are no receiving waters within the vicinity of the DPW yard.

*Provided training to employees involved in IDDE program within the reporting period*

The Town is part of the Buzzards Bay Stormwater Collaborative, and utilizes their resources to meet the Towns monitoring and IDDE requirements. The Collaborative prepared a series of IDDE training videos in June 2020. Town employees will review the IDDE videos provided by the Collaborative in the Year 3 Reporting Period.

*All curbed roadways were swept at least once within the reporting period*

The Town began to draft and implement a street sweeping program in 2019. The program will be refined to complete street sweeping a minimum of two times per year (spring and fall), and be continued in the Year 3 Reporting Period.



*Updated outfall and interconnection inventory and priority ranking as needed*

The Collaborative updated the outfall and interconnection inventory, and priority ranking for the Town in the Year 3 Reporting Period.

## **Bacteria / Pathogens**

### Annual Requirements

#### *Public Education and Outreach*

*Annual message was distributed to encourage the proper management of pet waste, including noting any existing ordinances where appropriate*

A pamphlet regarding proper management of pet waste was prepared and included reference to the Town of Marion Bylaw 109-6. The pamphlet was included in the annual census mailing distributed to all residents. The mailing was distributed in December 2019. The pamphlet will be included in the census mailing during the Year 3 Reporting Period.

*Permittee or its agents disseminated educational material to dog owners at the time of issuance or renewal of dog license, or other appropriate time*

Similar to the above, a pamphlet regarding proper management of pet waste was prepared and included reference to the Town of Marion Bylaw 109-6. The pamphlet was included in the annual census mailing distributed to all residents. The mailing was distributed December 2019. The pamphlet will be included in the census mailing during the Year 3 Reporting Period.

*Provided information to owners of septic systems about proper maintenance in any catchment that discharges to a water body impaired for bacteria*

This information was not distributed to owners of septic systems during the Year 2 Reporting Period. This information will be distributed to owners of septic systems during the Year 3 Reporting Period.

## **Nitrogen**

### Annual Requirements

#### *Public Education and Outreach*

*Distributed an annual message in the spring (April/May) that encourages the proper use and disposal of grass clippings and encourages the proper use of slow-release fertilizers*

This information was not distributed to residents during the Year 2 Reporting Period. This information will be distributed to all residents during the Year 3 Reporting Period.

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

Similar to the above, a pamphlet regarding proper management of pet waste was prepared and included reference to the Town of Marion Bylaw 109-6. The pamphlet was included in the annual



census mailing distributed to all residents. The mailing was distributed December 2019. The pamphlet will be included in the census mailing during the Year 3 Reporting Period.

*Distributed an annual message in the fall (August/September/October) encouraging the proper disposal of leaf litter*

This information was not distributed to residents during the Year 2 Reporting Period. This information will be distributed to residents during the Year 3 Reporting Period.

*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)*

The Town began to draft and implement a street sweeping program in 2019. The program will be refined to complete street sweeping a minimum of two times per year (spring and fall), and be continued in the Year 3 Reporting Period.

*Potential Structural BMPs*

*Any structural BMPs listed in Table 3 of Attachment 1 to Appendix H already existing or installed in the regulated area by the permittee or its agents was tracked and the nitrogen removal by the BMP was estimated consistent with Attachment 1 to Appendix H. The BMP type, total area treated by the BMP, the design storage volume of the BMP, and the estimated nitrogen removed in mass per the BMP were documented.*

There are multiple BMPs throughout the Town, but they were not tracked for nitrogen removal consistent with Attachment 1 to Appendix H of the MS4 General Permit. The Town initiated discussions with the Collaborative for assistance of BMP nitrogen removal tracking in the Year 3 Reporting Period.



## Attachment No. 2

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

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

In the Year 1 Reporting Period, the total number of Town-owned outfalls/interconnections was reduced from 112 to 80, following a more detailed review of available record drawings. No changes to the list of receiving waters, outfalls, or impairments have been made since the Year 1 Reporting Period.

The Collaborative updated and mapped the receiving waters, outfalls, and impairments in the Year 2 Reporting Period.



## Attachment No. 3

### Part IV: Minimum Control Measures

#### MCM1: Public Education

Included in the Year 2 Annual Report.

#### MCM2: Public Participation

Opportunity for public review and comment of the SWMP was not provided in Year 2 due to the COVID-19 pandemic. Opportunity will be given in the Year 3 Reporting Period.

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

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

No new SSOs were reported during the Year 2 Reporting Period.

##### **MS4 System Mapping**

All Phase I System Mapping items have been complete except for open channel conveyances. The IDDE Plan completed by CDM Smith in May 2020 for the Town includes the Phase I System Mapping. The Collaborative updated and mapped the catchment delineation and impair waterbodies in the Year 2 Reporting Period.

##### **Screening of Outfalls / Interconnections**

The Town contracted with the Massachusetts Maritime Academy (MMA) to complete screening of the outfalls and interconnections. Screening of outfalls and interconnections was delayed for the Year 2 Reporting Period due to the COVID-19 pandemic. Screening of outfalls and interconnections began in July 2020, and will be complete during the Year 3 Reporting Period. No results to report to date.

##### **Catchment Investigations**

The Town contracted with the MMA to complete screening of the outfalls and interconnections. Catchment investigations were delayed for the Year 2 Reporting Period due to the COVID-19 pandemic. Catchment investigations began in July 2020. As of September 2020, 16 dry weather samples were collected. Catchment investigations will continue and will be complete during the Year 3 Reporting Period.

##### **IDDE Progress**

The Town contracted with the MMA to complete investigation of illicit discharges through screening of outfalls and interconnections and catchment investigations. Investigation of illicit discharges was delayed for the Year 2 Reporting Period due to the COVID-19 pandemic. The Collaborative in conjunction with the MMA and the Buzzards Bay National Estuary Program began IDDE investigation in the Town on August 2020, utilizing the Collaborative's Illicit Discharge Investigation Trailer. IDDE investigation will continue during the Year 3 Reporting Period. No results to report to date.



### **Employee Training**

The Town of Marion is part of the Buzzards Bay Stormwater Collaborative, and utilizes their resources to meet the Towns monitoring of IDDE requirements. The Collaborative prepared a series of IDDE training videos in June 2020. Town employees have reviewed the IDDE videos provided by the Collaborative in the Year 3 Reporting Period.

### **MCM4: Construction Site Stormwater Runoff Control**

No construction site plan reviews, inspection, or enforcement actions occurred in the Year 2 Reporting Period.

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

Stormwater Bylaws, including a requirement for submission of as-built drawings, have been drafted. The finalized Stormwater Bylaws will be submitted to the Board of Selectmen for review, adopted in the Town of Marion Bylaws, and included in the SWMP. This will be completed in the Year 3 Reporting Period.

Work associated with Street Design and Parking Lots Report, Green Infrastructure Report, Retrofit Properties Inventory, due in Year 4 of the permit term, has not been started.

### **MCM6: Good Housekeeping**

### **Catch Basin Cleaning**

Reported in the Year 2 Annual Report.

### **Street Sweeping**

Reported in the Year 2 Annual Report.

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

All permittee-owned properties have been inventoried and included in the SWMP as of March 2020. O&M Procedures for vehicles and equipment were included in the Operations and Maintenance Program – Standard Operating Procedures, prepared by CDM Smith, in the Year 2 Reporting Period. O&M Procedures for parks and open spaces and buildings and facilities will be completed in the Year 3 Reporting Period.

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

Written SWPPPs for the DPW Maintenance Garage and WPCF were completed by GAF Engineering, Inc., in the Year 3 Reporting Period. Corrective actions have not yet been completed.

