

Year 7 Annual Report

Massachusetts Small MS4 General Permit

Reporting Period: July 1, 2024-June 30, 2025

****Please DO NOT attach any documents to this form. Instead, attach all requested documents to an email when submitting the form. Also ensure any websites included on this form are to publicly accessible sites****

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, 2024 and June 30, 2025 unless otherwise requested.

Part I: Contact Information

Name of Municipality or Organization: Town of Ludlow

EPA NPDES Permit Number: MAR041014

Primary MS4 Program Manager Contact Information

Name: James Goodreau

Title: Assistant Town Engineer

Street Address Line 1: 198 Sportsmen's Road

Street Address Line 2: N/A

City: Ludlow

State: MA

Zip Code: 01056

Email: jgoodreau@ludlow.ma.us

Phone Number: (413) 583-5625

Stormwater Management Program (SWMP) Information

SWMP Location (publicly available web address): <https://ludlow.ma.us/storm-water-management/>

Date SWMP was Last Updated: Sep 29, 2025

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

N/A

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 7 Requirements

- ☐ Completed catchment investigations associated with Problem Outfalls
☐ Completed catchment investigations where information gathered on the outfall/interconnection indicated sewer input

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 publicly available website:

- ☒ Updated system map due in year 10 with information from completed catchment investigations
☒ Provided training to employees involved in IDDE program within the reporting period
☒ Properly stored and disposed of catch basin cleanings and street sweepings so they did not discharge to receiving waters

- ☒ All curbed roadways were swept at least once within the reporting period
- ☒ 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 or provide any additional details, please use the box below:

All catchment investigations associated with Problem Outfalls or outfalls where information gathered on the outfall/interconnection indicated sewer input have either been completed or are in progress.

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
- ☐ This is not applicable because there are no septic systems present

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

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

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

Annual Requirements

*Public Education and Outreach**

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

- ☒ Distributed an annual message in the summer (June/July) encouraging the proper management of pet waste, including noting any existing ordinances where appropriate
- ☒ Distributed an annual message in the fall (August/September/October) encouraging the proper disposal of leaf litter

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

Structural BMPs

- ☐ Installed a structural BMP as a demonstration project within the drainage area of the water quality limited water or its tributaries. The type of BMP installed is (e.g. biofiltration):

Any structural BMPs listed in Attachment 3 to Appendix F 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 3 to Appendix F. 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.

- ☐ No BMPs were installed
- ☒ The above referenced BMP information is attached to the email submission
- ☐ The above referenced BMP information can be found at the following publicly available website:

Total estimated nitrogen removed in lbs/year from the installed BMPs: 817

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:

Roads in high traffic areas and Minechoag Pond Watershed were swept at least twice within the reporting year, but not all municipal owned streets and parking lots were swept twice due to staff and funding availability.

A semi-structural BMP was completed during the Year 6 reporting period in June 2024 at 486 Chapin Street. Although this property does not fall within a high loading catchment area, the reduction to impervious area at this site is significant. Approximately 2.3 acres of impervious area was converted to pervious area, removing an estimated 23.6 lb/yr of nitrogen.

Lake and Pond Phosphorus TMDL

Below, calculate your current phosphorus export rate by first filling out the individual phosphorus loading components (labeled [A], [B], [C], and [D]) and then computing your current phosphorus export rate using the equation provided.

Baseline phosphorus export rate from LPCP Area (lbs/year) [A]:	100.47
Total phosphorus reduction from all nonstructural controls this reporting period (lbs/year) [B]:	2.25
Total phosphorus reduction from all structural controls installed this reporting period and all previous years (lbs/year) [C]:	2.09
Phosphorus load increase due to development incurred since baseline loading was calculated in lbs/year [D]:	0
Current phosphorus export rate from the LPCP Area in lbs/year [=A-(B+C)+D from above]:	96.13

I certify under penalty of law that all source control and treatment Best Management Practices being claimed for phosphorus reduction credit have been inspected, maintained and repaired in accordance ☒ with manufacturer or design specification. I certify that, to the best of my knowledge, all Best Management Practices being claimed for a phosphorus reduction credit are performing as originally designed.

☒ All municipally owned and maintained turf grass areas are being managed in accordance with Massachusetts Regulation 331 CMR 31.00 pertaining to proper use of fertilizers on turf grasses

☐ Implemented all nonstructural control measures **during this reporting period** and documented the measures and their phosphorus reduction. The nonstructural control measure information:

- ☒ is attached to the email submission
- ☐ can be found at the following publicly available website:

☒ Documented the structural control measures implemented during **this reporting period and all previous years**, including location, phosphorus reduction in weight/year, and date of last completed maintenance and inspection for each control. The structural control measure information:

- ☐ is not applicable; no structural control measures were implemented
- ☒ is attached to the email submission
- ☐ can be found at the following publicly available website:

The LPCP: *(select one of the following options. If you submitted your LPCP in a prior year and have an updated website, please include the website below)*

- ☐ was submitted with a prior annual report
- ☐ is attached to the email submission
- ☒ can be found at the following publicly available website:

<https://ludlowma.work/wp-content/uploads/sites/2/2025/06/Ludlow-Year-5-Annual-Report-Attachments-1.pdf>

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:

A written performance evaluation estimating the reduction in phosphorus associated with the non-structural

controls implemented in Year 7 and the structural controls implemented in Year 7 and in all previous years has been completed. This performance evaluation was completed after the close of the Year 7 reporting period but prior to the submission of this Annual Report. The performance evaluation has been included as an attachment to the email submission of the Annual Report.

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:

One existing outfall that was previously shown in GIS mapping was determined to be in error and was removed. The corresponding catchment area for this outfall and nearby catchment areas were re-delineated. The outfall list and catchment areas were redrawn after the Year 7 reporting period had ended but prior to submission of the Year 7 annual report.

Prior to the Year 7 Annual Report, previous changes include:

1. Adding E. Coli and Water Chestnut as impairments for Chicopee River (MA36-24) based on updates made to the 303d list.
2. Eight additional existing outfalls and corresponding catchments that had not previously been reported were identified and added. (One outfall was added in Year 4; two outfalls were added in Year 5; five outfalls were added in Year 6.)

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:Pollution Prevention for Businesses

Message Description and Distribution Method:

Pollution prevention document for businesses is posted on the town website. Provides an overview of pollution prevention and information on source reduction, reuse/recycling, and energy recovery as three methods of accomplishing pollution prevention.

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

This document has been posted on the Town of Ludlow website, under the Department of Public Works Stormwater Management Information: "Pollution Prevention Businesses"

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:Stormwater Management for Developers

Message Description and Distribution Method:

Stormwater management document for developers is posted on the Town website. The document encourages wise site selection, careful development, and the use of Low Impact Development (LID) practices. The document also addresses perceived barriers of cost, cold weather impacts, drinking water quality, and public safety.

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

This document has been posted on the Town of Ludlow website, under the Department of Public Works

Stormwater Management Information: "Developers"

Message Date(s): June 2019 - ongoing

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

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

If yes, describe why the change was made:

BMP:Construction Stormwater Tips

Message Description and Distribution Method:

Construction Stormwater Tips document is posted on the Town website. The document includes a diagram that portrays various methods of preventing pollution and reducing stormwater runoff during construction.

Targeted Audience: Developers (construction)

Responsible Department/Parties: DPW Construction

Measurable Goal(s):

This document has been posted on the Town of Ludlow website, under the Department of Public Works Stormwater Management Information: "Construction"

Message Date(s): June 2019 - ongoing

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

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

If yes, describe why the change was made:

BMP:Stormwater Pollution Prevention for Industrial Sites

Message Description and Distribution Method:

Stormwater Pollution Prevention document for industrial sites is posted on the Town website. This document addresses erosion prevention, sediment control, and runoff management; dust control; and eliminating unauthorized non-stormwater discharges. It also describes the need for a Stormwater Pollution Prevention Plan, a spill prevention and response procedure, employee training, and proper salt storage.

Targeted Audience: Industrial facilities

Responsible Department/Parties: DPW Operations

Measurable Goal(s):

This document has been posted on the Town of Ludlow website, under the Department of Public Works

Stormwater Management Information: "Stormwater Pollution Prevention for Industrial Sites"

Message Date(s): June 2019 - ongoing

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

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

If yes, describe why the change was made:

BMP:Going Green with Stormwater - Rain Gardens

Message Description and Distribution Method:

Going Green with Stormwater - Rain Gardens document is posted on the Town website. This document includes information about the benefits of a rain gardens and how to create them.

Targeted Audience: Residents

Responsible Department/Parties: DPW Operations

Measurable Goal(s):

This document has been posted on the Town of Ludlow website, under the Department of Public Works Stormwater Management Information: "Going Green Rain Gardens"

Message Date(s): August 2022 - ongoing

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

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

If yes, describe why the change was made:

BMP:Builder's Guide to Low Impact Development

Message Description and Distribution Method:

Builder's Guide to Low Impact Development is posted on the the Town website. This document provides information about Low Impact Development (LID) and LID site planning and design concepts.

Targeted Audience: Developers (construction)

Responsible Department/Parties: DPW Operations

Measurable Goal(s):

This document has been posted on the Town of Ludlow website, under the Department of Public Works Stormwater Management Information: "Builders Guide Low Impact Development"

Message Date(s): August 2022 - ongoing

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

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

If yes, describe why the change was made:

BMP:Stormwater Pollution Prevention for Homeowners

Message Description and Distribution Method:

Stormwater Pollution Prevention guide for homeowners is posted on the Town website. This document highlights ways homeowners can reduce stormwater pollution, including picking up after their dogs and using proper practices and materials when: working on the lawn and garden, using chemicals and salts, washing cars and boats, repairing automotives, and maintaining swimming pools and hot tubs.

Targeted Audience: Residents

Responsible Department/Parties: DPW Operations

Measurable Goal(s):

This document has been posted on the Town of Ludlow website, under the Department of Public Works Stormwater Management Information: "Stormwater Pollution Prevention for Homeowners"

Message Date(s): June 2019 - ongoing

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

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

If yes, describe why the change was made:

BMP:Education for Residents on Lawn Fertilizing

Message Description and Distribution Method:

Fertilizing the Lawn document posted on the Town website notes the impact lawn fertilizers can have on the environment and provides tips for the proper use of fertilizers to reduce this impact. 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.

Targeted Audience: Residents

Responsible Department/Parties: DPW Operations

Measurable Goal(s):

This document has been posted on the Town of Ludlow website, under the Department of Public Works Stormwater Management Information: "Fertilizers". The website message is available year round, and the

local cable access station runs the message in the Spring.

Message Date(s): June 2019 - ongoing

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

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

If yes, describe why the change was made:

BMP:Dog Waste and Surface Water Quality

Message Description and Distribution Method:

Dog Waste and Surface Water Quality document is posted on the Town website that raises awareness of the pollution pet waste can cause to waterways and detail proper disposal of pet waste. The message will remain on the Town website and will be available throughout the year. The message encourages the proper management of pet waste. Educational material on pet waste and surface water quality is provided to dog owners at the time of issuance and renewal of dog licenses.

Targeted Audience: Residents

Responsible Department/Parties: DPW Operations

Measurable Goal(s):

This document has been posted on the Town of Ludlow website, under the Department of Public Works Stormwater Management Information: "Pet Waste". The message will remain on the Town DPW website year-round to encourage the proper management of pet waste. The Town Clerk has educational materials on pet waste and surface water quality available to dog owners at time of issuance and renewal of dog licenses. A public service announcement was run on the local cable access channel in the winter.

Message Date(s): June 2019 - ongoing

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

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

If yes, describe why the change was made:

The Town ran an additional public service announcement beyond what was proposed in the NOI.

BMP:EPA & DEP General Stormwater Information

Message Description and Distribution Method:

Links to EPA and DEP General Stormwater Information are posted on the town website.

Targeted Audience: Residents

Responsible Department/Parties: DPW Operations

Measurable Goal(s):

The EPA and DEP links have been posted on the Town of Ludlow website, under the Department of Public Works Stormwater Management Information.

Message Date(s): June 2019 - ongoing

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

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

If yes, describe why the change was made:

BMP:Safe Hazardous Waste Disposal

Message Description and Distribution Method:

The Town is to provide information and resources to residents seeking to safely dispose of hazardous waste.

Targeted Audience: Residents

Responsible Department/Parties: DPW Operations

Measurable Goal(s):

The Town directed residents to nearby facilities to encourage residents to dispose of hazardous waste properly. A link to the DEP's website on safely managing hazardous household products has been posted on the Town of Ludlow website, under the Department of Public Works Stormwater Management Information.

Message Date(s): June 2018 - ongoing

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

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

If yes, describe why the change was made:

The previous BMP included an in-person hazardous waste collection day. Since this event is no longer being held, this was updated in Year 5 to say that the Town will direct residents to nearby facilities to properly dispose of hazardous waste.

BMP:Maintenance of Septic Systems in Impaired Water Body Catchment

Message Description and Distribution Method:

Provide information on proper maintenance to owners of septic systems within any catchment that discharges to the Chicopee River (MA36-24), which has a fecal coliform impairment. A document is posted on the Town website and includes a diagram that provides guidelines for the proper use and maintenance of a septic system.

Targeted Audience: Residents

Responsible Department/Parties: DPW Operations

Measurable Goal(s):

This document has been posted on the Town of Ludlow website, under the Department of Public Works Stormwater Management Information: "Septic Smart"

Message Date(s): June 2019 - ongoing

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

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

If yes, describe why the change was made:

BMP:Annual Leaf Litter Disposal Message

Message Description and Distribution Method:

A document is posted on the Town website that encourages mulching, composting, and proper local disposal of leaf litter to reduce contamination of waterways. Annual message distributed in the Fall (August/September/October) encouraging the proper disposal of leaf litter.

Targeted Audience: Residents

Responsible Department/Parties: DPW Operations

Measurable Goal(s):

This document has been posted on the Town of Ludlow website, under the Department of Public Works Stormwater Management Information: "Leaf Litter". A public service announcement was run on the local cable access channel in the Fall.

Message Date(s): June 2019 - ongoing

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

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

If yes, describe why the change was made:

BMP:Stormwater Management for Small Businesses

Message Description and Distribution Method:

A stormwater management document for small businesses is posted on the Town website highlighting low impact development practices that collect, slow down, spread out, and filter stormwater into the soil.

Targeted Audience: Residents

Responsible Department/Parties: DPW Operations

Measurable Goal(s):

This document has been posted on the Town of Ludlow website, under the Department of Public Works Stormwater Management Information: "Slow the flow"

Message Date(s): September 2020 - ongoing

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

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

If yes, describe why the change was made:

BMP:Anti-icing BMPs

Message Description and Distribution Method:

An anti-icing BMP document is posted on the Town website. This document includes proper mixing and treatment methods for anti-icing.

Targeted Audience: Businesses, institutions and commercial facilities

Responsible Department/Parties: DPW Construction

Measurable Goal(s):

This document has been posted on the Town of Ludlow website, under the Department of Public Works Stormwater Management Information: "Anti-Icing"

Message Date(s): 2021- ongoing

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

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

If yes, describe why the change was made:

BMP:Stormwater Pollution Prevention for Small Residential Construction Sites

Message Description and Distribution Method:

A stormwater pollution prevention document has been posted on the Town website for small residential construction sites. This documents includes a diagram with 10 steps to prevent stormwater pollution on a small residential construction site, as well as information regarding the EPA's Construction General Permit (CGP) Small Residential Lot Stormwater Pollution Prevention Plan (SWPPP) Template.

Targeted Audience: Developers (construction)

Responsible Department/Parties: DPW Operations

Measurable Goal(s):

This document has been posted on the Town of Ludlow website, under the Department of Public Works Stormwater Management Information: "Pollution Prevention-Small Construction Sites"

Message Date(s): 2021 - ongoing

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

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

If yes, describe why the change was made:

BMP:Oil Spills From Your Vehicle

Message Description and Distribution Method:

A document has been posted on the Town website highlighting the importance of checking for oil leaks in vehicles, containing spills when working on vehicles, and proper disposal of motor oil.

Targeted Audience: Residents

Responsible Department/Parties: DPW Operations

Measurable Goal(s):

This document has been posted on the Town of Ludlow website, under the Department of Public Works Stormwater Management Information: "Oil Spills"

Message Date(s): 2021 - ongoing

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

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

If yes, describe why the change was made:

Reducing water pollution from motor oil is pertinent to the Town of Ludlow's overall Stormwater Management Plan, and specific messaging related to proper vehicle maintenance and repair practices, and disposal of used oil was determined to be an important supplement to the public education and outreach originally outlined in the NOI.

BMP:Put Waste in its Place for Clean Water

Message Description and Distribution Method:

A waste management document for businesses has been posted on the Town website providing a list of practices for properly storing and disposing of trash in a manner that will reduce pollution to waterways.

Targeted Audience: Businesses, institutions and commercial facilities

Responsible Department/Parties: DPW Operations

Measurable Goal(s):

This document has been posted on the Town of Ludlow website, under the Department of Public Works Stormwater Management Information: "Put Waste In Its Place"

Message Date(s): 2021 - ongoing

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

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

If yes, describe why the change was made:

Waste management for businesses is pertinent to the Town of Ludlow's overall Stormwater Management Plan, and specific messaging related to proper storage and disposal of trash was determined to be an important supplement to the public education and outreach originally outlined in the NOI.

BMP:Maintaining BMPs at Industrial Facilities

Message Description and Distribution Method:

Post Maintaining your BMPs document on Town website.

Targeted Audience: Industrial facilities

Responsible Department/Parties: DPW Operations

Measurable Goal(s):

This document has been posted on the Town of Ludlow website, under the Department of Public Works Stormwater Management Information: "Spill Prevention Industrial"

Message Date(s): 2019 - ongoing

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

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

If yes, describe why the change was made:

BMP:Washing your Car

Message Description and Distribution Method:

A document has been posted on the Town website highlighting practices to reduce water pollution when washing vehicles.

Targeted Audience: Residents

Responsible Department/Parties: DPW Operations

Measurable Goal(s):

This document has been posted on the Town of Ludlow website, under the Department of Public Works Stormwater Management Information: "Wash Car"

Message Date(s): 2021 - ongoing

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

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

If yes, describe why the change was made:

Reducing water pollution caused by car washing is pertinent to the Town of Ludlow's overall Stormwater Management Plan, and specific messaging related to car washing practices that reduce water pollution was determined to be an important supplement to the public education and outreach originally outlined in the NOI.

BMP: Think Blue Connecticut River Website

Message Description and Distribution Method:

Message description and distribution method: The Think Blue Connecticut River website is at the core of all regional messaging about stormwater. The website at www.thinkblueconnecticutriver.org does the following:

- Covers major areas of messaging about reducing polluted stormwater flows, including lawn and yard care, pet waste management, car care, controlling soil erosion, soaking up the rain, and septic system care
- Addresses the key 4 audiences plus educators
- Serves as the “landing place” for information on nearly all social media messaging

In the past year, PVPC has developed a new logo for the Think Blue Connecticut River website as a way to draw greater interest from all audiences in the region. The logo features a river otter, inspired by drone video footage capture of otters in lower Abbey Brook in Chicopee. The river otter will help with future messaging in drawing more powerful connection between the need for clean stormwater to support the lives of these and other important creatures. The core message being, how we manage our lawns, pet waste, septic systems, etc. has direct impact on the otter and other wildlife dependent on rivers, streams, lakes, and wetlands. Selection of the otter is also based on its qualities as a charismatic megafauna with greater public appeal and thus potential for inducing a response to appeals for cleaning up stormwater. PVPC will be working with the Stormwater Committee in the coming year to consider ways to use the otter to best effect.

www.thinkblueconnecticutriver.org/ms4-communities/

Targeted Audience: Residents, Developers, Industries, Businesses, institutions and commercial facilities

Responsible Department/Parties: PVPC staff and Connecticut River Stormwater Committee members

Measurable Goal(s):

A total of 5,060 people visited the Think Blue Connecticut River website during Year 7 and spent an average of 12 seconds on viewing pages on stormwater best practices. Beyond the web analytics reported below on specific messages, there were the following views of the general audience pages on the Think Blue

Connecticut River website:

Residents views = 69; Businesses and Institutions views = 48; Developers views = 59; Industries views = 29; and Educators views = 39.

Message Date(s): July 1, 2024 through June 30, 2025

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:

As indicated in previous annual reports, the website was not mentioned in the NOI and SWMP, but it has been central to all messaging in the region, providing additional information and resources on key topics.

BMP:Proper Management of Pet Waste (during time of licensing)

Message Description and Distribution Method:

Messaging included a slide for use by local cable access television stations in English and Spanish, and an e-mail message to municipal clerks/dog officers providing materials for use in the licensing process.

The cable access message was simplified based on feedback from cable tv stations on a Year 5 fall leaf litter messages. This message in Year 7 on pet waste also focused specifically on communicating that pet waste should be put in a trash bin. Public works officials on the Connecticut River Stormwater Committee had stressed the importance of this point because they are frequently finding bagged pet waste in catch basins.

Materials provided to municipal clerks and licensing officers was based on a survey done in Year 3 about what might be the most effective methods for messaging through their licensing process.

www.thinkblueconnecticutriver.org/ms4-communities/

Targeted Audience: Residents

Responsible Department/Parties: PVPC staff and Connecticut River Stormwater Committee members

Measurable Goal(s):

The cable access message in English and Spanish went to 18 local stations and email reminders went out to 20 Town Clerks

Message Date(s): December 2024-April 2024 (depending on municipality)

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

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

If yes, describe why the change was made:

The NOI/SWMP indicated pet waste messaging only in summer months as PVPC understood that messaging under the Appendixes could be combined. EPA has indicated that additional messaging to dog owners “at time of licensing” is required. Messaging at time of licensing was added, starting in Year 2, along with additional messaging on pet waste during “stay at home” orders with the pandemic (given the increased visibility of associated problems).

BMP:Proper Management of Pet Waste (summer)

Message Description and Distribution Method:

Paid placement social media messages on Facebook and Instagram at the start of the summer swimming season targeted people in Connecticut Stormwater Committee zip codes who had identifiers that match “pets at home” and “dog walking.”

As this message in Year 7 on pet waste also focused specifically on communicating that pet waste should be put in a trash bin. We also sent the following email and sign to local BOH, parks departments & Conservation Commission to post in the Town’s parks and open space areas and included information on installing signage, kiosks and pet waste stations.

www.thinkblueconnecticutriver.org/ms4-communities/

Targeted Audience: Residents

Responsible Department/Parties: PVPC staff and Connecticut River Stormwater Committee members

Measurable Goal(s):

Messaging reached 892 people in Stormwater Committee communities with 273 individuals clicking on the “Pledge” button to go to the Pick Up Poop pledge on the Think Blue Connecticut River website.

Analytics for the Think Blue Connecticut River website, indicate that there were another 109 people went to the pet waste landing page on the Think Blue Connecticut River website.

The email and sign went to 20 local Boards of Health, 20 parks and/or recreation departments & 20 Conservation Commissions in the region.

Message Date(s): The social media message ran on Facebook and Instagram for eight days from June 24 to July 1, 2025.

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:

To provide additional messaging.

BMP:Pet Waste

Message Description and Distribution Method:

Paid placement social media messages on Facebook and Instagram at the start of the summer swimming season targeted people in Connecticut Stormwater Committee zip codes who had identifiers that match “pets at home” and “dog walking.”

www.thinkblueconnecticutriver.org/ms4-communities/

Targeted Audience: Businesses, institutions and commercial facilities

Responsible Department/Parties: PVPC staff and Connecticut River Stormwater Committee members

Measurable Goal(s):

Messaging reached 892 people in Stormwater Committee communities with 273 individuals clicking on the “Pledge” button to go to the Pick Up Poop pledge on the Think Blue Connecticut River website.

Analytics for the Think Blue Connecticut River website, indicate that there were another 109 people went to the pet waste landing page on the Think Blue Connecticut River website.

Message Date(s): The social media message ran on Facebook and Instagram for eight days from June 24 to July 1, 2025.

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:

To provide additional messaging.

BMP:Proper Septic System Care

Message Description and Distribution Method:

Recognizing that Boards of Health are the primary point of contact on septic systems for residents, the Stormwater Committee worked this year toward better understanding and enabling them in this role. A survey went out to all Boards of Health, asking several questions, including

- Whether they are in possession of a list of septic system owners in Town from Board of Assessors.
- Whether issuing a direct mail letter to septic system owners makes sense
- When approving septic plans, does the BOH make a practice of providing three-page EPA flyer on septic system care?
- If yes, can BOH track this?
- If no, willing to begin this practice?

Based on the survey responses, Boards of Health received several messaging items for their use including a letter to customize and send to septic owners in their municipality on proper septic maintenance and care, social medial posts as well as an EPA flyers in both English and Spanish were provided for Board of Health use.

www.thinkblueconnecticutriver.org/ms4-communities/

Targeted Audience: Residents

Responsible Department/Parties: PVPC staff and Connecticut River Stormwater Committee members

Measurable Goal(s):

The survey and follow-up content went to 20 Boards of Health in the region.

Additionally, analytics for the Think Blue Connecticut River website, indicate that there were another 17 people went to the Septic System landing page on the Think Blue Connecticut River website.

Message Date(s): May 2025

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:

To provide additional messaging and as reported previously, the NOI/SWMP indicated septic system messaging would be done in Year 3 only as MS4 permit language in Appendix H was not entirely clear on the timing of this message. EPA has since indicated that septic system messaging must occur each year. The Connecticut River Stormwater Committee adjusted accordingly, starting in Year 2.

BMP:Proper disposal of leaf litter

Message Description and Distribution Method:

For Year 7, PVPC worked with the Be a Leaf Hero social media posts developed by the Cape Cod Commission, already customized by PVPC for the Connecticut River Stormwater Committee. Messaging to the residential audience included the following:

- Slides displayed by local cable access television stations
- A flyer for posting on member webpages

Both messaging elements included a “call to action,” providing a link to a series of tips and more in-depth content on the Think Blue Connecticut River website. The flyer included a link to locations for proper disposal of leaves and yard waste in each community. See website page at: <https://thinkblueconnecticutriver.org/be-a-leaf-hero/>. The content seeks to promote better practices with leaf litter and build understanding about potential contamination of stormwater with leaf litter.

Given the election season this fall, however, there was no related social media messaging. In past election seasons, there has been heightened security around social media and the work to get through barriers to post has been extremely time consuming. With the U.S. presidential election this fall, it is anticipated that these issues will only be compounded.

Targeted Audience: Residents

Responsible Department/Parties: PVPC staff and Connecticut River Stormwater Committee members

Measurable Goal(s):

The cable access message went to 18 local stations. Analytics for the Think Blue Connecticut River website page on leaf litter, indicate that there were a total of 1416 views on the website landing page with 3 downloads.

Message Date(s): October 11 - October 29, 2024

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:

to provide additional information

BMP: Proper disposal of leaf litter**Message Description and Distribution Method:**

For the business and commercial audience in Year 7, PVPC issued a letter to reach 147 landscaping and lawn care companies in the region with best practices messaging on disposal of leaf litter and leaf. We also included a survey asking questions related to managing and disposing of leaves from lawns and yards. Signed by the Committee Chair and Co-chair, the letter promoted several key best practices:

- Keep leaves off of driveways and roadways where they can easily wash into storm drains and contribute to higher nutrient flows during the fall season.
- Use a mulching mower. By mulching the leaves into turf areas, you avoid having to rake/blow and bag and you offer a way to manage autumn leaves while providing clients with free fertilizer. Mulched leaves recycle nutrients and reduce the overall need for applied fertilizer, which can help to reduce nutrient loading for local rivers, streams, and lakes.
- Alternatively, if your client has an existing compost pile, you can recommend that they consider allowing you to add leaves to the pile. Leaves provide a critically important element (carbon) to the composting process, making for a more soil enriching product to be used in the next growing season. Be sure compost piles are located away from streams, lakes, or storm drains as these decomposing materials and nutrients could easily reach these water resources.

A survey went out to all 147 landscaping companies in the region asking several questions, including

- Do you ever use a mulching mower to manage leaves on your client's lawns and yards?
- If you have never used a mulching mower, is there anything that would be helpful in enabling you to mulch leaves into the lawn (e.g. help with purchasing equipment, informative brochure for use with your client on the benefits of mulching leaves)?
- Do you ever add leaves to your client's composting pile?
- Do you ever take leaves to a nearby farm or other facility that composts leaves
- Do you ever dispose of leaves in another location?
- If yes, please indicate what other location you use to dispose of leaves at:
- Would you like more information on possible locations where land care professionals can dispose of leaves?
- If yes, please provide your company name and best contact for additional information:
- If you did not answer "yes" in Question 7 and would like to be entered into raffle, please provide your name and contact information here:

www.thinkblueconnecticutriver.org/ms4-communities/

Targeted Audience: Business/institutions/commercial facilities

Responsible Department/Parties: PVPC staff and Connecticut River Stormwater Committee members

Measurable Goal(s):

Letter and survey were mailed to 147 landscapers in the region with a \$100 home depot gift card incentive to participate in survey. Only 2 surveys were completed.

Message Date(s): October 22, 2024 - November 30, 2024

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:

To provide additional messaging.

BMP:Importance of Soil Test, Proper Use of Fertilizers**Message Description and Distribution Method:**

For the Stormwater Committee, PVPC worked with UMass Cooperative Extension to improve outreach content for Think Blue and UMass web pages to simplify the process of soil testing, interpreting results, and then acting on those results. For its part, PVPC revised elements on the Think Blue website related to lawn care including:

- Soil test information, noting that 95% of soil tests showing that already way overblown on nutrients – clear pattern
- References to good field guide resource(s)

Once these updates were made, PVPC worked with the Stormwater Committee social media consultant on social media campaign with a slightly revised lead message: “Know what your lawn needs.”

www.thinkblueconnecticutriver.org/ms4-communities/

Targeted Audience: Residents

Responsible Department/Parties: PVPC staff and Connecticut River Stormwater Committee members

Measurable Goal(s):

Analytics for the Think Blue Connecticut River website page on lawn care, indicate that there were a total of 1917 views on the website landing page with 4 downloads.

Message Date(s): May 7, 2025 - May 14, 2025

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:Importance of Soil Test, Proper Use of Fertilizers**Message Description and Distribution Method:**

For the business audience, PVPC had planned to do an op-ed piece in the Business West magazine featuring a local business following best practices, but we were unable to locate a company willing to work with us on a letter to the editor. We made significant outreach efforts with repeated emails and calls to follow up with over ten local businesses but were never returned and we were unsuccessful.

www.thinkblueconnecticutriver.org/ms4-communities/

Targeted Audience: Business/institutions/commercial facilities

Responsible Department/Parties: PVPC staff and Connecticut River Stormwater Committee members

Measurable Goal(s):

We called/emailed/visited in person over 10 local businesses with large facilities requiring landscaping to interview and also tried to connect with several commercial landscape companies to interview but no one responded.

Message Date(s): April 2025

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 Stormwater Management Program (SWMP) has been posted to the Town's website. The Town will address any questions or comments from the public regarding the development and implementation of the SWMP.

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:**

A Town-wide community cleanup day took place on May 3, 2025. An estimated 1 ton of trash was collected.

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

Percent of Phase II map complete:

Optional: Provide additional status information regarding your map:

One existing outfall that was previously shown in GIS mapping was determined to be in error and was removed. The corresponding catchment area for this outfall and nearby catchment areas were re-delineated. Other minor adjustments to storm drain linework were made based on review of historic plans and site investigations.

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 above referenced outfall screening data is attached to the email submission
- ☐ The above referenced outfall screening data can be found at the following publicly available website:

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

Number of outfalls screened:

Below, report on the percent of outfalls/interconnections screened **to date**.

Percent of outfalls screened:

Optional: Provide additional information regarding your outfall/interconnection screening:

Outfall screenings have been marked as complete in the metrics above for outfalls that were located and screened, including any required dry weather sample testing. Outfalls that require additional dry weather sample testing or that were submerged at the time of screening have not been marked as complete; investigation and sampling to occur either at the outfall (if accessible) or at the first accessible upstream manhole or structure during the catchment investigations of these outfalls.

At the time of the Year 7 Annual Report submission, all of the known outfalls in the Town (excluding problem outfalls) have been visited or a visit has been attempted. Remaining dry weather screening activities for outfalls that require additional dry weather sample testing or that were submerged at the time of screening will be revisited during the catchment investigations of these outfalls. Additional outfall screening was completed after the Year 7 reporting period but prior to the submission of this Annual Report. The results of

these screenings have been included in the attached outfall screening data but have not been included in the metrics above given that they occurred after the Year 7 reporting period.

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 publicly available 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:

One catchment investigation was completed during the Year 7 reporting period and has been attached to the email submission of this report.

20 additional catchment investigations are in progress, either requiring further investigation or follow up due to wet weather testing. These catchment investigations have not been recorded as completed in this reporting period.

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 publicly available 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:

Wet weather testing conducted towards the end of the Year 6 reporting period indicated possible contaminants at two outfalls. The catchment investigation of one of these outfalls is complete, the other is ongoing. The source of the possible contaminants has not been identified at either outfall as of the submission of the Year 7 Annual Report. Efforts towards identifying and removing any potential illicit discharges that may be occurring at these two outfalls to continue.

Employee Training

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

Staff attended multiple employee trainings hosted by Fuss & O'Neil and the EPA, including:

- Outfall Inspection & Water Quality Sampling on March 3, 2025
- Illicit Discharge Detection & Elimination on March 10, 2025
- MS4 Stormwater Permit Overview on March 17, 2025

Staff conducts regular discussions on the maintenance of stormwater infrastructure with employees.

MCM4: Construction Site Stormwater Runoff Control

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

Number of site plan reviews completed:

Number of inspections completed:

Number of enforcement actions taken:

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

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

As-built Drawings

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

Number of as-built drawings received:

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

Street Design and Parking Lots Report

Below, describe any changes made or planned to be made to local regulations and guidelines based on the report completed in Year 4:

Recommendations were made for changes to local regulations and guidelines in the Ludlow Street Design Parking Lot and GI Assessment Memo completed in Year 4 that are under review but have not yet been adopted.

Green Infrastructure Report

Below, describe progress towards making green infrastructure practices allowable based on the report completed in Year 4:

Recommendations were made for changes to local regulations and guidelines in the Ludlow Street Design Parking Lot and GI Assessment Memo completed in Year 4 that are under review but have not yet been adopted.

Retrofit Properties Inventory

Below, list remaining permittee-owned properties that could be modified or retrofitted with BMPs to mitigate impervious areas (must maintain a minimum of 5 sites in inventory until less than 5 sites remain):

24 Center Street - Hubbard Memorial Library
167 Howard Street - Whitney Park
211 Highland Avenue - John F. Thompson Memorial Swimming Pool
499 Center Street - Island Pond Cemetery
13 Watt Avenue - Electric Park

Below, list all properties that have been modified or retrofitted with BMPs to mitigate impervious area that were inventoried as part of 2.3.6.d of the permit and the type of BMP(s) implemented. Non-MS4 owned properties that have been modified or retrofitted with BMPs to mitigate impervious area may also be listed, but must be indicated as non-MS4.

A list of the properties inventoried as part of 2.3.6.d of the permit has been included as an attachment to the email submission of the Annual Report. This list includes both MS4 owned and Non-MS4 owned properties. The MS4 owned properties are located on the DPW Yard, which has been noted in the "Location" column.

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:

Town has not encountered catch basin sumps more than 50% full during two consecutive cleanings.

Street Sweeping

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

☒ Number of miles cleaned:

☐ Volume of material removed:

☐ Weight of material removed:

Stormwater Pollution Prevention Plan (SWPPP)

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

Number of site inspections completed: 1

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

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 publicly available 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

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.

Year 8

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

Yes, I agree ☒

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)
- Identify additional permittee-owned properties that could potentially be modified or retrofitted with BMPs to reduce impervious areas so that the permittee maintains a minimum of 5 sites in their inventory, until such a time when the permittee has less than 5 sites remaining

Provide any additional details on activities planned for permit year 8 below:

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Part V: Certification of Small MS4 Annual Report 2025

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: Marc Strange

Title: Town Administrator

Signature: 

Date: 9-19-25

[Signatory may be a duly authorized representative]

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

Annual Report Submission

Please submit the form electronically via email to both EPA and MassDEP by clicking on one of the links below or using the email addresses listed below. Please ensure that all required attachments are included in the email and not attached to this PDF.

EPA: stormwater.reports@epa.gov

MassDEP: Stormwater.DEP@mass.gov

Paper Signature:

If you did not sign electronically above, you can print the signature page by clicking the button below.

Optional: If you did not sign electronically above, you may lock the form by clicking the "Lock Form" button below which will prompt you to save the locked version of the form. Save this locked version under a new file name.