Year 2 Annual Report
Massachusetts Small MS4 General Permit
Reporting Period: July 1, 2019-June 30, 2020

Please DO NOT attach any documents to this form. Instead, attach all requested documents to an email when submitting the form

Unless otherwise noted, all fields are required to be filled out. If a field is left blank, it will be assumed the requirement or task has not been completed. Please ONLY report on activities between July 1, 2019 and June 30, 2020 unless otherwise requested.

Part I: Contact Information

Name of Municipality or Organization: Town of Oxford

EPA NPDES Permit Number: MAR041147

Primary MS4 Program Manager Contact Information

Name: Sean M Divoll, PE Title: Director of Public Works

Street Address Line 1: 450 Main Street

Street Address Line 2:

City: Oxford State: MA Zip Code: 01540

Email: sdivoll@oxfordma.us Phone Number: (508) 987-6006

Stormwater Management Program (SWMP) Information

SWMP Location (web address): https://www.town.oxford.ma.us/stormwater-management/pages/oxford-stormwater-management-program

Date SWMP was Last Updated: June 19, 2020

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

Part II: Self-Assessment

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

Impairment(s)

☒ 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:

The system mapping includes all required information except for the initial catchment delineation. Due to engineering staffing changes over the past two years and the delay in hiring a new engineer because of COVID-19, we decided to procure the services of a consulting firm for this and other tasks. Initial catchment

delineation will be mapped in the next permit year under a contract with Tighe & Bond.

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:

A meeting scheduled for public review of the SWMP with the Conservation Commission was cancelled due to COVID-19 impacts. The SWMP is available on the Town's website and a public meeting will be held in the next permit year.

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:

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:

1. Not all streets were swept twice a year due to current staffing resources.
2. BMP tracking and estimated nitrogen removal was not conducted during this reporting period. Due to engineering staffing changes over the past two years and the delay in hiring a new engineer because of COVID-19, the Town will procure the services of a consulting firm to track structural BMPs and estimate nitrogen removal.

Lake and Pond Phosphorus TMDL

☐ Completed Legal Analysis

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:

Due to impacts from COVID-19, the Town was delayed in hiring a consultant to conduct a legal analysis. This task will be completed in the next permit year under a contract with consulting firm.

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

Part III: Receiving Waters/Impaired Waters/TMDL

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

- ○ Yes
- ◉ No

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

Part IV: Minimum Control Measures

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

MCM1: Public Education

Number of educational messages completed **during this reporting period**: 7

*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: Rain Barrel Program (BMP 1-2)

Message Description and Distribution Method:

Organized rain barrel purchase program for town residents to collect and re-use rain water.

Targeted Audience: Residents

Responsible Department/Parties: DPW

Measurable Goal(s):

Successful event - 30 rain barrels were sold and distributed to residents.

Message Date(s): Distribution Day was May 30, 2020

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

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

If yes, describe why the change was made:

BMP: Proper Maintenance of Parking Lots (BMP 1-4)

Message Description and Distribution Method:

"Keep Pollution at Bay-One Parking Lot at a Time" flyer was mailed to all Industrial Facilities in Town. The information is also available on the Town's website.

Targeted Audience: Industrial facilities

Responsible Department/Parties: DPW

Measurable Goal(s):

76 Industrial Facilities received the flyer.

Message Date(s): June 18, 2020

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

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

If yes, describe why the change was made:

BMP: Proper Disposal of Leaf Litter (BMP 1-9)

Message Description and Distribution Method:

"What to do with your yardful of leaves..." flyer describes option for homeowners to mulch, compost or dispose of leaves

Targeted Audience: Residents

Responsible Department/Parties: DPW

Measurable Goal(s):

600 flyers were handed out to residents during the annual Fall Bulk Drop-off event.

Message Date(s): October 26, 2019 and November 2, 2019

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

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

If yes, describe why the change was made:

BMP: Annual Message-Use/Disposal of Grass Clippings & Proper Use of Fertilizer (BMP 1-10)

Message Description and Distribution Method:

Think Blue Massachusetts shared posts on Facebook in the spring encouraging the proper use and disposal of grass clippings and encouraged the proper use of slow-release fertilizer

Targeted Audience: Businesses, institutions and commercial facilities; Residents

Responsible Department/Parties: Massachusetts Statewide Municipal Stormwater Coalition

Measurable Goal(s):

The Think Blue Massachusetts Facebook account has approximately 300 followers and averages approximately 3,000 reaches per month.

Message Date(s): November 1, 2019; April 28 & 30, 2020; May 14 & 22, 2020

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

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

If yes, describe why the change was made:

Our annual flyer distribution at the annual Spring Bulk Drop-off was canceled due to COVID-19.

BMP: Proper Management of Pet Waste (BMP 1-11)

Message Description and Distribution Method:

Dog Waste and Surface Water Quality Flyer was handed out with dog licenses.

Targeted Audience: Residents

Responsible Department/Parties: DPW and Town Clerk

Measurable Goal(s):

200 flyers were handed out.

Message Date(s): March 2020

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

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

If yes, describe why the change was made:

BMP: Annual Pet Waste Message- Scoop the Poop

Message Description and Distribution Method:

Think Blue Massachusetts shared posts on Facebook in the summer to encourage the proper management of pet waste.

Targeted Audience: Residents

Responsible Department/Parties: Think Blue Massachusetts

Measurable Goal(s):

The Think Blue Massachusetts Facebook account has approximately 300 followers and averages approximately 3,000 reaches per month.

Message Date(s): July 17, 2019; August 14, 2019, April 9, 14 & 16, 2020; May 13, 18, 28 & 29, 2020; June 2, 2020

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

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

If yes, describe why the change was made:

This is an additional message that was not originally planned in our SWM Program.

BMP: Annual Septic Maintenance Message

Message Description and Distribution Method:

Think Blue Massachusetts shared posts on Facebook regarding Septic Smart Week to provide information to owners of septic systems about proper maintenance.

Targeted Audience: Residents

Responsible Department/Parties: Think Blue Massachusetts

Measurable Goal(s):

The Think Blue Massachusetts Facebook account has approximately 300 followers and averages approximately 3,000 reaches per month.

Message Date(s): September 16, 2019

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

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

If yes, describe why the change was made:

This is an additional message that was not originally planned in our SWM Program.

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 is available on the Town's website for viewing by any interested party and participation in the program is encouraged. Residents have contacted the Town in regards to conducting clean-up projects and Earth Day projects.

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**:

Residents participated in eight roadside clean-up projects during the Spring 2020 where over 35 bags of trash were collected and disposed of. Many of the locations were along the French River or other wetland/streams.

MCM3: Illicit Discharge Detection and Elimination (IDDE)

Sanitary Sewer Overflows (SSOs)

Check off the box below if the statement is true.

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

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

Number of SSOs identified: 0

Number of SSOs removed: 0

MS4 System Mapping

Below, check all that apply.

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

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

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

Open channels and interconnections were mapped this permit year and will be incorporated into the current real-time online system in the next permit year. Initial catchment delineations will be mapped under a contract with a consulting firm during the next permit year.

Screening of Outfalls/Interconnections

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

○ The outfall screening data is attached to the email submission
◉ The outfall screening data can be found at the following website:

https://www.town.oxford.ma.us/sites/g/files/vyhlif4836/f/uploads/

fy20_dry_weather_outfall_inspections_in_ua.pdf

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

Number of outfalls screened: 77

Catchment Investigations

If conducted, please submit all data collected during this reporting period as part of the dry and wet weather investigations. Also include the presence or absence of System Vulnerability Factors for each catchment.

- ○ The catchment investigation data is attached to the email submission
- ○ The catchment investigation data can be found at the following website:

Below, report on the number of catchment investigations completed ***during this reporting period****.*

Number of catchment investigations completed this reporting period: 0

Below, report on the percent of catchments investigated ***to date.***

Percent of total catchments investigated: 0

Optional: Provide any additional information for clarity regarding the catchment investigations below:

IDDE Progress

If illicit discharges were found, please submit a document describing work conducted over this reporting period, and cumulative to date, including location source; description of the discharge; method of discovery; date of discovery; and date of elimination, mitigation, or enforcement OR planned corrective measures and schedule of removal.

- ○ The illicit discharge removal report is attached to the email submission
- ○ The illicit discharge removal report can be found at the following website:

Below, report on the number of illicit discharges identified and removed, along with the volume of sewage removed ***during this reporting period.***

Number of illicit discharges identified: 0

Number of illicit discharges removed: 0

Estimated volume of sewage removed: 0 gallons/day

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

Total number of illicit discharges identified: 1

Total number of illicit discharges removed: 1

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**:

August 2019: Outfall Inspection and Water Quality Sampling Video Training, sponsored by the Central Massachusetts Regional Stormwater Coalition (CMRSWC) was completed by one employee.

May 2020: IDDE Training Workshop sponsored by CMRSWC was attended by two employees. (This was an online workshop due to COVID.)

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: 20

Number of inspections completed: 31

Number of enforcement actions taken: 1

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

Formal procedures for site plan reviews, inspections and enforcement actions have been completed.

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:

As-built Plans and Operation and Maintenance Plans are required for all constructed stormwater management systems since 2005 in accordance with the Town of Oxford General By-Laws, Chapter 67.

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:

No progress has been made on this requirement.

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:

No progress has been made on this requirement.

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:

No progress has been made on this requirement.

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: 597

Number of catch basins cleaned: 629

Total volume or mass of material removed from all catch basins: 483 cubic yards

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

Total number of catch basins: 1,066

If applicable:

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

Records will be analyzed to determine if any sumps are more than 50% full during the past two years; contributing drainage areas will then be investigated for sources of excessive sediment loading in the next permit year.

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: 412 cubic yards
- ○ 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: 0

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 website(s):

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

Additional Information

Optional: Enter any additional information relevant to your stormwater management program implementation during the reporting period. Include any BMP modifications made by the MS4 if not already discussed above:

The Town continues to pursue the hiring of a Town Planner to assist with By-Law updates. The Town is also planning to expand current consultant services to include drafting updates to the Town's Stormwater By-Law to include the Year 2 permit requirements of Section 2.3.6.a.

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:

Site inspections at facilities requiring a SWPPP were not conducted during the reporting period due to reduction in on-site staffing during the early months of the COVID-19 pandemic. Inspections are scheduled to be conducted during the first quarter of the next reporting period (July-September 2020) and quarterly there after.

Activities Planned for Next Reporting Period

Please confirm that your SWMP has been, or will be, updated to comply with all applicable permit requirements including but not limited to the year 3 requirements summarized below. (Note: impaired waters and TMDL requirements are not listed below)

Yes, I agree ☒

- Inspect all outfalls/ interconnections (excluding Problem and Excluded outfalls) for the presence of dry weather flow
- Complete follow-up ranking as dry weather screening becomes available

Annual Requirements

- Annual report submitted and available to the public
- Annual opportunity for public participation in review and implementation of SWMP
- Keep records relating to the permit available for 5 years and make available to the public
- Properly store and dispose of catch basin cleanings and street sweepings so they do not discharge to receiving waters
- Annual training to employees involved in IDDE program
- Update inventory of all known locations where SSOs have discharged to the MS4
- Continue public education and outreach program
- Update outfall and interconnection inventory and priority ranking and include data collected in connection with the dry weather screening and other relevant inspections conducted
- Implement IDDE program
- Review site plans of construction sites as part of the construction stormwater runoff control program
- Conduct site inspection of construction sites as necessary
- Inspect and maintain stormwater treatment structures
- Log catch basins cleaned or inspected
- Sweep all uncurbed streets at least annually
- Continue investigations of catchments associated with Problem Outfalls
- Review inventory of all permittee owned facilities in the categories of parks and open space, buildings and facilities, and vehicles and equipment; update if necessary

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

Part V: Certification of Small MS4 Annual Report 2020

40 CFR 144.32(d) Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, I certify that the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Name: Sean Divoll, P.E. Title: Director of Public Works

Signature: Sean Divoll Digitally signed by Sean Divoll Date: 2020.09.28 10:46:02 -04'00' Date:

[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: laura.schifman@mass.gov

Paper Signature:

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

Print Signature Page

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.

Lock Form