

Melissa Murphy-Rodrigues
Town Manager

Town of Sudbury

Office of the Town Manager
www.sudbury.ma.us

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278 Old Sudbury Rd
Sudbury, MA 01776-1843
978-639-3381
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Municipality/Organization: Town of Sudbury MA

EPA NPDES Permit Number: MAR04-1224

MassDEP Transmittal Number: _____

**Annual Report Number
& Reporting Period:** Year 13 –
April 1, 2015 – March 31, 2016

NPDES PII Small MS4 General Permit Annual Report (Due: May 1, 2016)

Part I. General Information

Contact Person: I. William Place Title: Director of Public Works

Telephone #: 978-440-5421

Email: placeb@sudbury.ma.us

Mailing Address: 275 Old Lancaster Rd., Sudbury MA 01776

Certification:

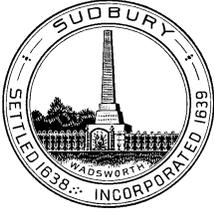
I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, 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.

Signature: M. Murphy-Rodrigues

Printed Name: Melissa Murphy-Rodrigues

Title: Town Manager

Date: 4/26/16



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May 1, 2016

Glenda Velez – CIP
U.S. Environmental Protection Agency - Region 1
5 Post Office Square – OEP06-01
Boston, MA 02109-3912

Fred Civian
Massachusetts Department of Environmental Protection
One Winter Street - 5th Floor
Boston, MA 02108

Re: NPDES DEP & EPA Permit #MAR041224
2015-2016 Year 13 Report

Dear DEP and EPA:

In accordance with our 2003 NPDES permit, please accept this document as our thirteenth annual report required under our MS4 Phase II Stormwater Permit covering April 1, 2015 to March 31, 2016. The purpose of the annual report is to document the status of Stormwater Management Program (SWMP) implementation through a self-assessment review of compliance with the permit conditions; an assessment of the appropriateness of the selected Best Management Practices (BMPs); an assessment of the progress towards achieving the measurable goals; a summary of results of any information that has been collected and analyzed; a discussion of activities for the next reporting cycle; a discussion of any changes in identified BMPs or measurable goals; and reference to any reliance on another entity for achieving any measurable goal.

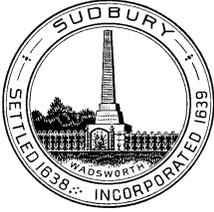
The Town of Sudbury (Town) continues our comprehensive efforts to protect our water quality through appropriate use of stormwater BMPs, controlling erosion, public education, illicit discharge detection and elimination (IDDE), water quality monitoring of stormwater discharges, encouragement of low impact development; and green infrastructure techniques.

Assessment of Compliance with Permit

The Town has completed the self-assessment and determined that it is in compliance with the current permit. In 2015, the Town of Sudbury continued to engage Woodard & Curran to assist in improving the efficiency and effectiveness of our stormwater program while increasing compliance and water quality protection. The program improvements have considered US EPA's NPDES General Permit for stormwater discharges from MS4s and anticipated components of the new permit obligations.

Appropriateness of Selected BMPs

The Town continues to find that our program BMPs are appropriate and effective for improving the quality of our stormwater runoff. We continue to evaluate the program and our physical infrastructure to determine the priority areas where upgrades to BMPs will result in the greatest improvement of runoff quality.



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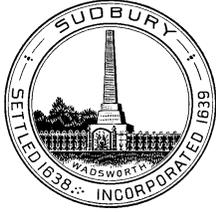
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Progress Towards Achieving Measurable Goals

Year 13 Measurable Goals:

During Year 13, the Town of Sudbury met and exceeded its requirements for each of the 2003 MS4 General Permit Minimum Control Measures for maintenance of its municipal drainage systems.

- The culverts and associated drainage structures at the Sudbury DPW facility were inspected and cleaned annually.
- The Town has an ongoing inspection, maintenance, and cleaning program for the Town's drainage system. Key highlights include:
 - 58 catch basins, outfalls, or manholes were repaired. The Town continues to systematically replace old corrugated metal drainage pipes with reinforced concrete pipes.
 - 1,119 catch basin sumps were cleaned and three culverts were replaced.
 - Installation of 16 precast catch basins, replacing the existing block catch basins.
 - Installation of 2 precast leaching tanks.
 - Replaced a total of 7 driveway aprons to provide proper stormwater drainage.
- The new Sudbury Police Headquarters went through major upgrades to stormwater treatment including the expansion of a wet pond, the installation of multiple stormwater infiltrators, and other site stormwater best management practices (BMPs).
- The Sudbury Engineering Department has completed a new drainage and stormwater treatment system for the Sudbury Town Center intersection which results in treatment of approximately 0.5 acres of impervious surfaces (pavement) not currently treated. Construction is approximately 90% complete and will be finished in the Summer of 2016.
- A total of 18 permits were issued and monitored under the Stormwater Management Bylaw for the Year 13 reporting period.
- To assist in the review and permitting of an SMP, the Town of Sudbury entered into a contract with the Horsley Witten Group for review of the individual stormwater permit applications, including construction monitoring. This third-party review is funded by the applicant in accordance with the SMP bylaw and regulations. Third-party reviews are also conducted for many Wetlands Protection Act permit applications.
- The Planning and Community Development Office maintains an on-going database of all Stormwater permits.
- Conservation Commission tracks all Orders of Conditions through a database.



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- In Fall 2014, the Sudbury DPW developed a written IDDE Program Manual in order to refine and aggregate its current IDDE program and procedures. The program manual included staff roles and responsibilities, a diagram of standard screening, investigation and enforcement workflow processes, preliminary prioritization of stormwater outfall catchment areas, and a training program. Public Works, Department of Health and Conservation staff have been trained on the components of the new program manual. Following the training, the Town purchased chlorine, ammonia, surfactants testing equipment, and a pole sampler to enhance stormwater outfall screening program components.
- The Sudbury DPW staff continued outfall visual screening on 97 outfalls in preparation for reprioritization of catchments under the reissued MS4 General Permit.
- On February 26, 2015 the Town of Sudbury DPW conducted a facilitated workshop with Town staff from Police, Fire, Parks and Recreation, Sudbury Housing Authority, and School Department to refine understanding of municipal property ownership and facility management, operations, or use activities that may contribute to stormwater pollution. An updated SOP manual for pollution prevention practices on these properties was developed in PY13 and delivered to facility managers.
- The Town conducts an annual roadside cleanup, where residents place trashbags on curbs full of roadside debris and DPW crew picks the bags up in the spring of each year.

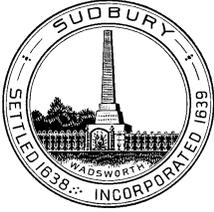
MCM#1: Public Education and Outreach

The Town's abundant waterways - ponds, streams, rivers, and wetlands - and their proximity to vast acres of National Wildlife Refuge, Sudbury Valley Trustees (SVT) and Town-owned lands give Sudbury its special character. Safeguarding the integrity of Sudbury's ponds and waterways is critical to maintain the Town's quality of life.

The Ponds & Waterways Committee activities continued the "Adopt-a-Pond" program, as well as the Eco-Friendly Lawn Program to promote environmentally-sensitive lawn care practices by minimizing the impact of lawn care on the surrounding environment. The lawn program was launched in 2010 and is still popular with residents in 2016. Lawn signs are displayed in the spring starting during Earth Week through the end of May, and again at the start of autumn, from September 1 through September 30. For more information on this program visit:

<https://sudbury.ma.us/pwc/2010/03/08/sudburys-eco-friendly-lawn-program>

Sustainable Sudbury, an outgrowth of the 2000 Earth Decade Committee, serves as a way to connect with neighbors and fellow citizens interested in protecting the environment and to learn how to help locally and globally. As a chapter of the Massachusetts Climate Action Network (MCAN), Sustainable Sudbury is dedicated to raising environmental awareness and sponsoring sustainable, earth-friendly activities in our community and beyond by encouraging residents to compost, recycle, practice organic gardening, sponsoring quarterly plastics collections, and annual foam collections. Activities have included rain barrel programs and Earth Machine composters are available for the discounted price of \$45. They are easy to assemble, rodent-



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resistant, and allow for efficient aerobic composting. They are made from a minimum of 50 percent post-consumer recycled plastic.

The Town's website (www.sudbury.ma.us) is a well-organized public notification tool for education and outreach. Articles written by town staff on stormwater and other environmental issues appear regularly.

MCM#2: Public Involvement and Participation

The Town provides household hazardous waste collection through the Hartwell Avenue Compost Facility in Lexington, MA. Residents have the opportunity to participate in seven Household Hazardous Waste Days in Lexington by pre-registering with the Sudbury Board of Health. This opportunity is advertised on the Town website, www.sudbury.ma.us, in the local newspaper, and on flyers throughout Town.

The Town continues to participate in the East Middlesex Mosquito Control Project. The Project services include mosquito and wetland surveillance, larval and adult mosquito control, ditch maintenance, and public education. Spray times and locations are advertised on the Town's website at www.sudbury.ma.us.

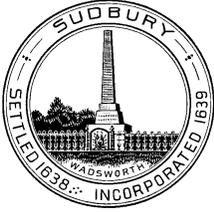
Public hearings on all full stormwater permit applications under the Town's Stormwater Management Bylaw are advertised in the local newspaper for 2 consecutive weeks prior to the hearing, on the Town's website, and notices are sent to all direct abutters. These hearings not only satisfy the statutory requirements under the Town's bylaws, but they also educate residents and contractors on BMPs for stormwater collection and treatment, site stabilization, and maintenance of systems after construction. Reports are often given by specially trained engineers at the hearings. During the current year reporting period, the Planning Board and Conservation Commission held over 5 public hearings on various applications for Stormwater Management Permits.

The Town's website (www.sudbury.ma.us) is a well-organized public notification tool for events and construction project updates. Opportunities for public involvement are posted to the "Front Page News" on the website's home page. The Sudbury Conservation Commission publishes articles, in an easy to understand format, on the Town's website, and in the local newspaper to educate the public regarding stormwater issues.

MCM#3: Illicit Discharge Detection and Elimination

Illicit Discharge and Detection procedures have been established and DPW employees have been educated on illicit discharge detection. DPW drainage maintenance crews are trained to be aware of and note via work order system any unusual odors, sheen, turbidity, etc. while working in the field.

Sudbury DPW developed a written IDDE Program Manual in order to refine and aggregate its current IDDE program and procedures. The program manual included staff roles and responsibilities, a diagram of standard screening, investigation and enforcement workflow



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processes, preliminary prioritization of stormwater outfall catchment areas, and a training program. The Town now owns chlorine, ammonia, surfactants testing equipment, and a pole sampler to enhance stormwater outfall screening program components. Sudbury DPW staff continued outfall visual screening on 97 outfalls in preparation for reprioritization of catchments under the reissued MS4 General Permit.

During Year 13, Sudbury DPW did not identify any illicit discharges. The Reporting and Complaint phone line in the DPW did not receive any reports of suspicious odors or substances in catch basins or waterways during the past year.

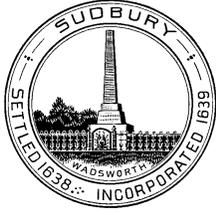
- The Town's drainage system mapping includes both point infrastructure (outfalls, catch basins, and manholes) and much of the pipe connectivity. The Town continues to refine its drainage system mapping through field investigation and is in the process of migrating all drainage system geographic database information into an updated database format.
- Sudbury DPW has established and utilizes a digital work order system, software, and mobile field collection tools, which allow for field documentation of infrastructure cleaning and condition.
- The Board of Health maintains a database that tracks septic systems by parcel ID, age of system, street number, failing systems, and Title 5 inspections.
- Sudbury Water District has an annual leak detection program for municipal water lines.
- Sudbury DPW's Stormwater Drain Tie-In permit application and monitoring program reports and tracks drainage tie-ins and provides better management of private pipe connections to public system. The Town does not grant many permits and promotes infiltration as a standard practice for management of on-site drainage.

MCM #4 and #5 Construction Site and Post-Construction Runoff Control

Sudbury's Stormwater Management Bylaw and regulations have been in effect since 2009 and staff has had an opportunity to see what works and what might need modification.

The Stormwater General Permit and Stormwater Management Permit thresholds regulate site development and obligate stormwater treatment systems for projects below the one acre disturbance threshold currently defined by the MS4 permit. Fourteen (14) stormwater management permits have been issued during Permit Year 13.

Sites with steep slopes and/or resource areas that could be at risk if erosion control measures fail are required to hire a Construction Monitor who is expected to report bi-weekly and after large storm events to the Conservation Commission or Planning Board. Third-party peer reviews are undertaken for both erosion and sediment control and stormwater treatment system design during the permitting of all significant SWPs. Construction inspections are required. All reports generated by these reviews are in the permit files at the Town Offices.



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A database of past permits and ongoing permits are maintained by the Planning and Community Development Office in coordination with DPW and the Conservation Office.

MCM #6 Pollution Prevention/Good Housekeeping

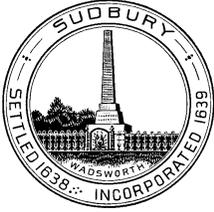
On February 26, 2015, Sudbury DPW conducted a facilitated workshop with Town staff from Police, Fire, Parks and Recreation, Sudbury Housing Authority, and School Department to refine understanding of municipal property ownership and facility management, operations, or use activities that may contribute to stormwater pollution. An updated SOP manual for pollution prevention practices on these properties was developed in PY13 and delivered to facility managers. A list of all municipally-operated facilities will be updated on an ongoing basis.

Planning staff have a dedicated budget for professional development and take advantage of regional conferences, workshops, and other training opportunities. Planning Board members are often asked to attend trainings on an as needed basis.

All members of the Sudbury Conservation Commission are actively taking advantage of education and training offered by MA Association of Conservation Commissions, MA Department of Environmental Protection, MA Department of Ecological Restoration, Association of MA Wetland Scientists, Bay State Roads, SuAsCo Watershed Council, and private entities, as it pertains to stormwater and water quality.

Activities for Next Reporting Cycle:

- The Town has hired outside consultation to refine the current stormwater management program and identify opportunities for enhanced compliance. This project will specifically:
 - Continue to revise and improve the Town's IDDE Program including preliminary screening of outfalls. Prepare for analytical screening and investigation procedures in high priority areas.
 - Erosion and Sediment Control Permit and Inspection Tracking – Enhance usefulness of Town's current permit tracking software for tracking and management of construction site and post-construction programs.
 - GIS Database Updates and Data Entry – Continue to refine the Town's drainage system GIS database to comply with the MS4 permit requirements.
- Continued operation and maintenance of drainage structures.
- Work closely with the Ponds & Waterways Committee to identify areas where joint water quality goals can be achieved. Schedule a meeting in 2016 between the DPW Department and the Ponds & Waterways Committee to inform them of the Town's activities regarding pollution prevention and stormwater compliance.



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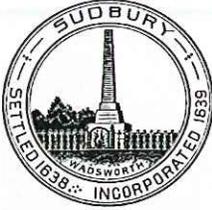
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- As funding permits, continue to provide the Public Participation/Public Involvement and the Public Education/Outreach components.
- Maintain or increase the visibility of the “Stormwater Matters” message and continue to encourage public education and involvement concerning the need to report any illegal discharges or release of illegal substances into the Town’s stormwater system.

We once again appreciate this opportunity to provide a status report on the Town of Sudbury’s progress toward our Stormwater Management Goals.

Sincerely,

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