

**Year 5 Annual Report**  
**Massachusetts Small MS4 General Permit**  
**New Permittees**  
**Reporting Period: July 1, 2022-June 30, 2023**

*\*\*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 publicly accessible\*\**

*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, 2022 and June 30, 2023 unless otherwise requested.*

**Part I: Contact Information**

Name of Municipality or Organization:

EPA NPDES Permit Number:

**Primary MS4 Program Manager Contact Information**

Name:

Title:

Street Address Line 1:

Street Address Line 2:

City:

State:

Zip Code:

Email:

Phone Number:

**Stormwater Management Program (SWMP) Information**

SWMP Location (web address):

Date SWMP was Last Updated:

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

## Part II: Self-Assessment

*First, in the box below, select the impairment(s) and/or TMDL(s) that are applicable to your MS4.*

**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 5 Requirements

- Completed Phase I of system mapping
- Identified each outfall and interconnection discharging from MS4, classified into the relevant category, and priority ranked each catchment for investigation
  - The priority ranking of outfalls/interconnections is attached to the email submission
  - The priority ranking of outfalls/interconnections 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:

Most of the Phase 1 Mapping has been completed. The Town of Hudson is planning to add catchment delineations, and town-owned structural BMPs which will complete outstanding Phase 1 Mapping requirements.

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:

- 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:

Employee training in IDDE to occur in October 2023.

SWPPPs were implemented, but quarterly inspections were not performed in FY23. However, SWPPP inspections will occur in permit year 6.

**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:

**Phosphorus (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 and phosphorus-free 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 already existing or installed in the regulated area by the permittee or its agents was tracked and the phosphorus 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 phosphorus 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:

Educational flyers have been created and distributed through the town's website. A stormwater division page will be published in permit year 6 and will contain annual reports, a SWMP update and more. The link will be [townofhudson.org/stormwater](http://townofhudson.org/stormwater).

BMPs to be reviewed in PY6.

**Lake and Pond Phosphorus TMDL**

Completed the written Phase 1 Lake Phosphorus Control Plan (LPCP), including: *(select the items in the Phase 1 LPCP that have been completed)*

- Planned nonstructural controls
- Planned structural controls
- O&M program for structural controls
- Implementation schedule
- Cost of implementation

The Phase 1 LPCP: *(select one of the following options)*

- is attached to the email submission

can be found at the following publicly available website:

*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 reduction required from LPCP Area (lbs/year) [A]:

Documented the nonstructural control measures implemented during **this reporting period** and their phosphorus reduction

total phosphorus reduction from all nonstructural controls this reporting period (lbs/year) [B]:

- No nonstructural control measures were implemented
- The nonstructural control measures information is attached to the email submission
- The nonstructural control measures information 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

total phosphorus reduction from all structural controls installed this reporting period and all previous years (lbs/year) [C]:

- No structural control measures were implemented
- The structural control measures information is attached to the email submission
- The structural control measures information can be found at the following publicly available website:

Phosphorus load increase due to development incurred since baseline loading was calculated in lbs/year [D]:

Current phosphorus export rate from the LPCP Area in lbs/year [=A-(B+C)+D from above]:

- 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

*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:

Funding source assessments were completed by Woodard & Curran in 2020 and 2021. The 2021 report also investigated the feasibility of installing structural and nonstructural controls. In PY6, we will begin assessing the reports developed by W&C. For now, these are included as part of the Annual Report. Note that the Town of Hudson borders Lake Boon. While the lake is mostly within the municipal boundary of Stow, the watershed is partially contained in Hudson.

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

The LCPC was initially contracted with Woodard & Curran in 2023. This contract enabled stormwater financing analysis and implement a Stormwater Utility. The Utility was passed on May 1, 2023. As a result, a Stormwater Manager was hired in PY6 who will be implementing MS4 related tasks.

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

Have you made any changes to your lists of receiving waters, outfalls, or impairments since the NOI was submitted? Make sure you are referring to the most recent EPA approved Section 303(d) Impaired Waters List which can be found here: <https://www.epa.gov/tmdl/region-1-impaired-waters-and-303d-lists-state>

Yes

No

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

## 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: 0

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: Stormwater Utility and General Stormwater Messaging**

##### Message Description and Distribution Method:

PY5 educational efforts included the development of several stormwater flyers. The Stormwater website remains up to date information and contains the "Think Blue Massachusetts" video. The website also contains other educational flyers including Stormwater and Stormwater Utility FAQ, and Stormwater Basics and Fact Sheet. There is also a flyer explaining DPW's efforts toward clean water. In addition, a meeting with the Select Board was held on September 12, 2022 to evaluate the Stormwater Program and Funding. Additional public presentations occurred in PY5 to discuss a Stormwater Utility. These public presentations occurred on November 8, 2022, March 21, 2023, and March 28, 2023. Finally, a Stormwater Utility through an enterprise fund was passed at the Annual Town Meeting on May 1, 2023.

Targeted Audience: All

Responsible Department/Parties: DPW Operations

Measurable Goal(s):

General awareness for target audiences: educated all targeted audiences about storm and sewer infrastructures and educated them on current program and funding needs.

Message Date(s): 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:

Funding for MS4 Permit compliance and stakeholder engagement was necessary to approve the Stormwater Utility. This was an additional effort beyond any that were described in the SWMP.

#### **BMP: Dog Waste Flyer**

##### Message Description and Distribution Method:

Dog waste flyers were created and distributed through the Online permitting software issued by the Town Clerk. The software is new to the Town and ongoing efforts are refining the process. The flyers speak to properly picking up and disposing pet waste. The flyers explain pet waste impacts on water quality, and how



pet waste differs from wildlife waste. Every dog license permit application has access to the online brochure.

Targeted Audience: Residents

Responsible Department/Parties: DPW Operations

Measurable Goal(s):

Supplemental message for water quality impaired waterways.

Message Date(s): 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: Septic System Flyer**

Message Description and Distribution Method:

A Septic System image was displayed on the Town's stormwater website. The flyer discusses maintenance and inspection requirements. It also displays signs of when a tank needs to be cleaned.

Targeted Audience: Residents and Businessess

Responsible Department/Parties: DPW Operations

Measurable Goal(s):

Supplemental message for water quality impaired waterways.

Message Date(s): 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:Fertilizer Flyer**

Message Description and Distribution Method:

The fertilizer image is a single-page brochure explaining the impacts of fertilizing your lawn and how to avoid getting it in the storm drain.

Targeted Audience: Businesses, institutions and commercial facilities, and residents

Responsible Department/Parties: DPW Operations

Measurable Goal(s):

Supplemental message for water quality impaired waterways.

Message Date(s): 8/23/2022

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: Clean Water Commitment**

Message Description and Distribution Method:

A flyer entitled, "Clean Water is Everybody's Business" was created and distributed on the Town's Stormwater-MS4 website. The flyer contains facts on the Town's sewer system, and stormwater drainage system. It also explains DPW's efforts to improve water quality.

Targeted Audience: All

Responsible Department/Parties: DPW Operations

Measurable Goal(s):

This flyer is posted on the Stormwater MS4 web page and is an additional effort beyond the SWMP.

Message Date(s): 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: Grass Clipping Flyer**

Message Description and Distribution Method:

The grass clipping image contains images and messages that if not disposed of properly, grass clippings can flow into storm drains. The image also states how grass clippings entering into water ways can increase nitrogen and lead to algae blooms.

Targeted Audience: Residents

Responsible Department/Parties: DPW Operations

Measurable Goal(s):

Message Date(s):

Message Completed for: Appendix F Requirements  Appendix H Requirements

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

If yes, describe why the change was made:

**BMP:Public Meeting**

Message Description and Distribution Method:

A Public Meeting was held to educate residents about MS4 Permit needs, and stormwater concerns. The meeting also spoke about the Stormwater By-Law and the Utility.

Targeted Audience: Residents

Responsible Department/Parties: DPW Operations

Measurable Goal(s):  
Eleven residents were at the meeting.

Message Date(s): 11/8/2022

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 was an additional outreach program that was not posted in the NOI or SWMP.

**BMP:Public Meeting**

Message Description and Distribution Method:

A second Public Meeting was held to educate residents about MS4 Permit needs, and stormwater concerns. The meeting also spoke about the Stormwater By-Law and the Utility.

Targeted Audience: Residents

Responsible Department/Parties: DPW Operations

Measurable Goal(s):

Eleven residents attended the meeting.

Message Date(s): 3/21/2023

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 was an additional outreach program that was not posted in the NOI or the SWMP.

**BMP:Public Meeting**

Message Description and Distribution Method:

A third Public Meeting was held to educate residents about MS4 Permit needs, and stormwater concerns. The meeting also spoke about the Stormwater By-Law and the Utility.

Targeted Audience: Residents

Responsible Department/Parties: DPW Operations

Measurable Goal(s):

Five residents attended the meeting.

Message Date(s): 3/23/2023

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 was an additional outreach program that was not posted in the NOI or the SWMP.

**BMP:Public Meeting**

Message Description and Distribution Method:

A fourth Public Meeting was held to educate residents about MS4 Permit needs, and stormwater concerns. The meeting also spoke about the Stormwater By-Law and the Utility.

Targeted Audience: Residents

Responsible Department/Parties: DPW Operations

Measurable Goal(s):

Seventy One residents attended the public meeting.

Message Date(s): 3/28/2023

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 was an additional outreach program that was not posted in the NOI or the SWMP.

**BMP:Stormwater Fact Sheet**

Message Description and Distribution Method:

The Town of Hudson created a Stormwater Fact Sheet and distributed it to residents at public meetings as part of the stormwater utility.

Targeted Audience: Residents

Responsible Department/Parties: DPW Operations

Measurable Goal(s):

Handouts were distributed to audience at public meetings. Additional handouts are currently on the front desk of DPW.

Message Date(s): 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:

This was an additional outreach program that was not posted in the NOI or the SWMP.

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 SWMP is posted on the Town website and is easily accessible.

As stated earlier, note that the website name will change to townofhudson.org/stormwater in PY6.

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:

[Empty text box for describing public involvement opportunities]

### 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

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

Total number of SSOs identified: 0

Total 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:

No SSOs were identified in PY5.

The Town of Hudson does not have any mapped or known interconnections.

System mapping contains stormwater infrastructure including catch basins, storm drainage lines and drainage man holes. Inlets, outlets, and culverts are also mapped. Mapping updates will occur in PY6.

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

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

Number of outfalls screened:

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

Percent of outfalls screened:

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

All outfalls were screened in 2020. Ranking will be reassessed in PY6.

**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 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: 0

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

Pending GIS licensing and availability, catchment delineations are anticipated to occur in PY6.

**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 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: 0

Total number of illicit discharges removed: 0

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

Data from previous outfall screenings will be reviewed and assessed in PY6. Next steps are anticipated to occur in the fall of 2023.

**Employee Training**

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

No training occurred this year. However, a Storm Water Manager was hired in PY6, and training will occur in October 2023.



**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: 7

Number of inspections completed: 6

Number of enforcement actions taken: 0

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

Planning and conservation regularly review various site plans throughout the year. In FY23, Planning used peer review services. Moving forward, these reviews and inspections will move to DPW. Peer review services will be used for large scale developments.

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

**Ordinance or Regulatory Mechanism**

Date ordinance was completed (due in year 3): May 1, 2023

Website of ordinance or regulatory mechanism:

**As-built Drawings**

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

Number of as-built drawings received: 0

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

There was no optional box below ordinance, so our comments are here: the local bylaw was passed during the May 1, 2023 Town Meeting. At this time, the bylaw is not on the Town's website, but is anticipated to be posted on the new stormwater webpage in PY6.

**Street Design and Parking Lots Report**

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

The report was contracted with Woodard & Curran. As stated earlier, the budget for this contract was allocated to cover the Stormwater Utility.

Information on street design and parking lot requirements will be reviewed in PY6.

### **Green Infrastructure Report**

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

The report was contracted with Woodard & Curran. The budget for this contract was allocated to cover the Stormwater Utility.

Information on infrastructure requirements will be reviewed in FY6.

### **Retrofit Properties Inventory**

Describe the status of the inventory of permittee-owned properties that could be modified or retrofitted with BMPs to mitigate impervious areas and report on any properties that have been modified or retrofitted:

An inventory of the town owned parcels was conducted in a report dated 6/28/2021. The report is entitled the Clean Water Best Practices Manual. The budget for this contract was allocated to cover the Stormwater Utility.

DPW designed a revision for an intersection at Cox Street, Old Stowe Road, and Old Bolton Road. The design was approved, and work was implemented resulting in the removal of approximately 10,433 square feet (+/-) of impervious surface areas.

## **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: 1,400

Number of catch basins cleaned: 1,400

Total volume or weight of material removed from all catch basins: 0 [Select Units]

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

Total number of catch basins: 3,400

*If applicable:*

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

Of the 3,400 catch basins in town roughly 74% are owned by the Town. The rest are on commercial properties, or private subdivisions.

**Street Sweeping**

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

- Number of miles cleaned:
- Volume of material removed:  [Select Units]
- Weight of material removed:  tons

**Stormwater Pollution Prevention Plan (SWPPP)**

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

Number of site inspections completed:

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

No inspections took place in PY5. Quarterly inspections will occur in PY 6.

**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. If any of the above year 5 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:

On May 1, 2023, the Town of Hudson approved a Stormwater Enterprise Fund at the annual Town Meeting. The first utility bills are anticipated to be billed in PY6. As part of the stormwater enterprise fund, a Stormwater Manager was hired on August 1, 2023. Generally, this position will provide MS4 Permit compliance oversight and assist with the implementation of the enterprise fund. Note that the Stormwater Manager is currently reviewing files, documents, data, and laws and regulations that are subject to the MS4 Permit. The Stormwater Manager has already started creating an education and outreach program, educational flyers, updated the SWMP and is drafting the new townofhudson.org/stormwater website in PY6. The Manager has also added language to the back of the water and sewer bills to explain the benefit the new stormwater utility.

### **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 6 requirements summarized below. (Note: impaired waters and TMDL requirements are not listed below)

Yes, I agree

- Develop a report assessing current street design and parking lot guidelines and other local requirements within the municipality that affect the creation of impervious cover
- Develop a report assessing existing local regulations to determine the feasibility of making green infrastructure practices allowable when appropriate site conditions exist
- Identify a minimum of 5 permittee-owned properties that could potentially be modified or retrofitted with BMPs to reduce impervious areas

### **Annual Requirements**

- Annual report submitted and available to the public
- Annual opportunity for public participation in review and implementation of SWMP
- Keep records relating to the permit available for 5 years and make available to the public
- Properly store and dispose of catch basin cleanings and street sweepings so they do not discharge to receiving waters
- Continue public education and outreach program
- Update inventory of all known locations where SSOs have discharged to the MS4
- Sweep all curbed roadways at least once within the reporting period
- Annual training to employees involved in IDDE program
- Clean catch basins in accordance with catch basin cleaning procedures to ensure that no catch basin is greater than 50% full
- Review site plans of construction sites as part of the construction stormwater runoff control program
- Conduct site inspections of construction sites as necessary
- Inspect and maintain stormwater treatment structures
- Log catch basins cleaned or inspected
- Sweep all curbed streets at least annually
- Implement 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
  - Enclose all road salt storage piles or facilities and implement 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

Provide any additional details on activities planned for permit year 6 below:

The Storm Water Manager is planning to develop or implement the following items in PY6

- Education and Outreach Plan
- SWPPP Inspections
- SWMP Update
- Catchment Delineations
- Regulatory assessment for various MS4 requirements
- Construction Requirements
- Mapping Updates
- MS4 Compliance Check list

In addition, stormwater review of proposed sites will be reviewed by the DPW. Transition from Planning to DPW is currently underway.

## Part VI: Certification of Small MS4 Annual Report 2023

### 40 CFR 144.32(d) Certification

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

Name:  Title:

Signature:  Date:

*[Signatory may be a duly authorized representative]*