

Maureen G. Valente
Town Manager

TOWN OF SUDBURY
Office of the Town Manager

278 Old Sudbury Road
Sudbury, Massachusetts 01776-1843
Tel: (978) 443-8891, x385
Fax: (978) 443-0756
E-mail: valentem@town.sudbury.ma.us

April 30, 2014

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
2013-2014 Year 11 Report

Dear DEP and EPA:

In accordance with our 2003 NPDES permit, please accept this document as our eleventh annual report required under our MS4 Phase II Storm water Permit covering April 1, 2013 to March 31, 2014. The purpose of the annual report is to document the status of Storm Water Management Program (SWMP) implementation through a self-assessment review of compliance with the permit conditions; an assessment of the appropriateness of the selected 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 continues our comprehensive efforts to protect our water quality through appropriate use of storm water best management practices, controlling erosion, public education, illicit discharge detection and elimination, water quality monitoring of stormwater discharges, encouragement of low impact development; and green infrastructure techniques.

Assessment of Compliance with Permit

We continue to plan for the new permit. The Town of Sudbury engaged Woodard & Curran to perform a compliance assessment of the Town's current Stormwater Management Program in order to improve efficiency and effectiveness while increasing compliance and water quality protection. The assessment evaluates the Town's current actions against requirements of the US EPA's NPDES General Permit for stormwater discharges from MS4s. The evaluation summarizes the Town's current practices and identifies strengths and opportunities to improve compliance with the 2003 MS4 General Permit and prepare for future requirements under the anticipated new General Permit.

Appropriateness of Selected BMPs

Sudbury continues to find that our approved bmps for newer construction are appropriate and effective for improving the quality of our stormwater runoff. We continue to review our drainage inventory to determine the priority areas where upgrades to bmps will result in the greatest improvement of runoff quality.

PROGRESS TOWARDS ACHIEVING MEASURABLE GOALS

Year 11 Measurable Goals:

During Year 11, Sudbury met and exceeded its requirement for maintenance of its roadway and walkway drainage systems. Where applicable, berms were installed to channel runoff to the bmps; drainage structures were raised or lowered to provide the correct gradient for flow into the bmp; and grading of the surfaces were pitched for proper drainage, and scoured and eroded areas were stabilized. Specifically,

- The culverts and associated drainage structures at the Town's DPW facility were inspected and cleaned on a quarterly basis.
- Floor drains in the DPW garage were inspected.
- The degreaser in the DPW wash bay was maintained.
- The "country" drainage structures (ditches) along two major roads were excavated to their original capacity.
- The Sudbury Engineering Dept. worked with consultants from VHB, Inc. to design a drainage and stormwater treatment system for the Sudbury Town Center. Funding has been secured for the project, with construction anticipated beginning in summer, 2014.
- The first town-owned porous pavement walkway was installed on Old Framingham Road.
- Sixteen new or repaired/redesigned drainage systems were completed. This included adding berms, installing leach pits,
- Fifty-two total catch basins, outfalls, or manholes were repaired or replaced. The Town continues to systematically replace old corrugated metal drainage pipes with reinforced concrete pipes. Low impact development techniques continue to be encouraged for new developments or retrofits, when feasible.
- A total of fourteen (14) permits were issued and monitored under the Stormwater Management Bylaw for the Year 11 reporting period.
- To assist in the review and permitting of a SWMP, Sudbury entered into a new contract with Hancock Associates for review of the individual stormwater permit applications, including construction monitoring. This third-party review is funded by the applicant in accordance with the SWMP bylaw and regulations.
- The Planning and Community Development Office maintains an on-going database of all Stormwater permits.

The Town continues identify and mark the actual outfall locations of some of the most historic drainage systems in town (pre 1950). A new culvert and overflow design was preliminarily approved for a section of Horse Pond Road that has experienced severe flooding and closures.

MCM#1: Public Education and Outreach

Sudbury contracted for the public education and outreach component for Year 11 with SuAsCo Watershed Council.

The Town of Sudbury is rich in natural beauty. 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 and the promotion of environmentally-sensitive lawn care practices by minimizing the impact of lawn care on the surrounding environment. Lawns signs were placed on lawns participating in this 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. 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-resistant and allow for efficient aerobic composting. They are made from a minimum of 50 percent post-consumer recycled plastic.

MCM#2: Public Involvement and Participation

Sudbury contracted for the public involvement and outreach component for Year 11 with SuAsCo Watershed Council in addition to providing 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, in the local newspaper, and in flyers throughout Town.

The Town of Sudbury 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

The Town 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.

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. Funding for the purchase of 2 portable Chem-Metrics field test kits was approved in early 2011 and remained available in Year 11 (2013) pending EPA's release of the new permit to be sure the appropriate parameters are being tested. DPW crews have become more aware of any unusual odors, sheen, turbidity, etc. During Year 11, the 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.

- Sudbury's drainage system mapping includes both point infrastructure (outfalls, catch basins and manholes) AND much of the pipe connectivity.

- The DPW has an established and formalized work order system, software, and mobile field collection tools, which allow for field documentation of infrastructure cleaning, condition and illicit discharge detection and removal.
- The Board of Health maintains a database that tracks parcel ID, age of septic system, street number, failing systems, and Title 5 inspections.
- Sudbury Water District has an annual leak detection program.
- DPW's Stormwater Drain Tie-In permit application and monitoring reports and tracks drainage tie-ins and provides better management of private pipe connections to public system.

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 far below the one acre threshold currently defined by the MS4 permit.

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 reports weekly and after large storm events, to the Conservation Commission or Planning Board. Third-party peer reviews for both erosion and sediment control and stormwater treatment system construction inspections are required.

MCM #6 Pollution Prevention/Good Housekeeping

The redesign of the roadway system and major drainage upgrades in the Town Center is nearing completion. At the 2013 Annual Town meeting residents voted to fund the project construction. Wetlands in the area of the Town Center have been flagged and meetings have been held to specify the best BMPs for use in this area.

See Progress toward Measurable Goals for additional activities, including DPW's formalized work order system, which provides documentation of activities. The DPW has begun several preliminary projects in this area for immediate benefit. This include adding drainage and pre-treatment on the newly acquired town parcel in the heart of the Center.

The Sudbury Conservation Commission is a seven member board of which 5 members have been on the board less than one year. All members and staff 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:

- Prepare for implementation of the new EPA Phase II MS4 permit requirements. To accomplish this, Sudbury has hired outside consultation to refine current stormwater management program and identify opportunities for enhanced compliance. This project will specifically result in an update to the Illicit Discharge and Detection Elimination Program and include staff trainings.
- Continued sampling of catch basins as prioritized by the DPW, Conservation Commission and Board of Health.

- Continued operation and maintenance of drainage structures in accordance with the increasing database schedule.
- Continue investigating the formation of a storm water utility.
- Earth Removal Bylaw to be drafted by Planning Board for presentation to Town Meeting.
- Work closely with the Ponds & Waterways Committee to identify areas where joint water quality goals can be achieved.
- Consider annual permit and fee for discharge to MS4.
- As funding permits, contract with SuAsCo 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 Sudbury's progress toward our Storm water Management Goals.

Sincerely,



Maureen G. Valente
Town Manager

Municipality/Organization: Town of Sudbury MA

EPA NPDES Permit Number: MAR04-1224

MassDEP Transmittal Number: W-

**Annual Report Number
& Reporting Period:** April 1, 2013 – March 31, 2014

NPDES PII Small MS4 General Permit
Annual Report
(Due: May 1, 2013)

Part I. General Information

Contact Person: Deborah Dineen/William I. Place **Title:** Conservation Coordinator/DPW Dir.

Telephone #: 978-440-5470/978-440-5490

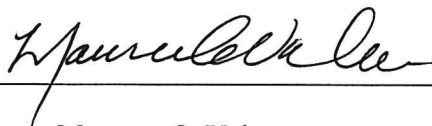
Email: dineend@sudbury.ma.us
placeb@sudbury.ma.us

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:



Printed Name: Maureen G. Valente

Title: Town Manager

Date: April 30, 2014

Municipality/Organization: Town of Sudbury MA

EPA NPDES Permit Number: MAR04-1224

MassDEP Transmittal Number: W-

**Annual Report Number
& Reporting Period:** April 1, 2013 – March 31, 2014

NPDES PII Small MS4 General Permit
Annual Report ⁴
(Due: May 1, 201~~3~~)

Part I. General Information

Contact Person: Deborah Dineen/William I. Place **Title:** Conservation Coordinator/DPW Dir.

Telephone #: 978-440-5470/978-440-5490

Email: dineend@sudbury.ma.us
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: Maureen G. Valente

Printed Name: Maureen G. Valente

Title: Town Manager

Date: April 30, 2014