

Year 6 Annual Report
Massachusetts Small MS4 General Permit
Reporting Period: July 1, 2023-June 30, 2024

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

Unless otherwise noted, all fields are required to be filled out. If a field is left blank, it will be assumed the requirement or task has not been completed. Please ONLY report on activities between July 1, 2023 and June 30, 2024 unless otherwise requested.

Part I: Contact Information

Name of Municipality or Organization: Town of Grafton

EPA NPDES Permit Number: MAR041119

Primary MS4 Program Manager Contact Information

Name: Brian Szczurko Title: Assistant Town Engineer

Street Address Line 1: Grafton Municipal Center

Street Address Line 2: 30 Providence Rd

City: Grafton State: MA Zip Code: 01519

Email: szczurkob@grafton-ma.gov Phone Number: (508) 839-5335

Stormwater Management Program (SWMP) Information

SWMP Location (publicly available web address): <https://www.grafton-ma.gov/DocumentCenter/View/13092/SWMP-Grafton-2024?bidId=>

Date SWMP was Last Updated: Jun 30, 2024

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

[Redacted physical address field]

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.

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:

https://www.grafton-ma.gov/DocumentCenter/View/13140/Grafton_IDDE_Plan_FY24?bidId=
- Updated system map due in year 10 with information from completed catchment investigations
- Provided training to employees involved in IDDE program within the reporting period
- Properly stored and disposed of catch basin cleanings and street sweepings so they did not discharge to receiving waters
- All curbed roadways were swept at least once within the reporting period
- Enclosed all road salt storage piles or facilities and implemented winter road maintenance procedures to minimize the use of road salt

- Implemented SWPPPs for all permittee owned or operated maintenance garages, public works yards, transfer stations, and other waste handling facilities
- Updated inventory of all permittee owned facilities as necessary
- O&M programs for all permittee owned facilities have been completed and updated as necessary
- Implemented all maintenance procedures for permittee owned facilities in accordance with O&M programs
- Implemented program for MS4 infrastructure maintenance to reduce the discharge of pollutants
- Inspected all permittee owned treatment structures (excluding catch basins)

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

The Town is continuing to update the mapping of its stormwater management system through the catchment investigation process and mapping as-builts, with the goal to have a complete map by Year 10.

As discussed in previous permit years, Grafton does not have any maintenance garages, public works yards, transfer stations, and other waste handling within the MS4 regulated area or that drains to MS4 regulated area, so there is no SWPPP to implement, which is in accordance with EPA's Response to Comments on the MS4 permit document, "municipal facilities outside of the MS4 area are not subject to the good housekeeping requirements at part 2.3.7."

79 of 81 Town-owned treatment structures were inspected this past permit year. Two of the BMPs could not be inspected due to construction.

Bacteria/ Pathogens (Combination of Impaired Waters Requirements and TMDL Requirements as Applicable)

Annual Requirements

*Public Education and Outreach**

- Annual message was distributed encouraging the proper management of pet waste, including noting any existing ordinances where appropriate
- Permittee or its agents disseminated educational material to dog owners at the time of issuance or renewal of dog license, or other appropriate time
- Provided information to owners of septic systems about proper maintenance in any catchment that discharges to a water body impaired for bacteria
 - This is not applicable because there are no septic systems present

** Public education messages can be combined with other public education requirements as applicable (see Appendix 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:

30 pet waste flyers were distributed during dog license renewals in permit year 6.

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) encouraging the proper use and disposal of grass clippings and encouraging 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)

Structural BMPs

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

Infiltration

- 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.

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

[Redacted]

Total estimated phosphorus removed in **lbs/year** from the installed BMPs: 0

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:

The Town of Grafton has estimated phosphorus removal for all existing BMPs within the Flint Pond watershed and is now focusing on estimating treatment for the remainder of the town.

Solids, Oil and Grease (Hydrocarbons), or Metals

Annual Requirements

Good Housekeeping and Pollution Prevention for Permittee Owned Operations

- Increased street sweeping frequency of all municipal owned streets and parking lots to a schedule that targets areas with potential for high pollutant loads
 - The street sweeping schedule is attached to the email submission
 - The street sweeping schedule can be found at the following publicly available website:

- Prioritized inspection and maintenance for catch basins to ensure that no sump shall be more than 50 percent full; Cleaned catch basins more frequently if inspection and maintenance activities indicated excessive sediment or debris loadings

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:

Grafton has developed a catch basin cleaning webmap which Grafton DPW uses to track catch basins cleaned and how full the structures are. The Town is planning to use it to start prioritizing specific areas/structures.

Lake and Pond Phosphorus TMDL

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

Baseline phosphorus export rate from LPCP Area (lbs/year) [A]:	89
Total phosphorus reduction from all nonstructural controls this reporting period (lbs/year) [B]:	0
Total phosphorus reduction from all structural controls installed this reporting period and all previous years (lbs/year) [C]:	14.8
Phosphorus load increase due to development incurred since baseline loading was calculated in lbs/year [D]:	2.3

Current phosphorus export rate from the LPCP Area in **lbs/year** [=A-(B+C)+D from above]: 76.5

- I certify under penalty of law that all source control and treatment Best Management Practices being claimed for phosphorus reduction credit have been inspected, maintained and repaired in accordance
- with manufacturer or design specification. I certify that, to the best of my knowledge, all Best Management Practices being claimed for a phosphorus reduction credit are performing as originally designed.
 - All municipally owned and maintained turf grass areas are being managed in accordance with Massachusetts Regulation 331 CMR 31.00 pertaining to proper use of fertilizers on turf grasses
 - Implemented all nonstructural control measures **during this reporting period** and documented the measures and their phosphorus reduction. The nonstructural control measure information:
 - is attached to the email submission
 - can be found at the following publicly available website:

See the optional box for more details.

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

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

<https://vhb.maps.arcgis.com/apps/webappviewer/index.html?id=9e7d127e6b934026bf68e193937a650d>

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

- was submitted in the Year 5 Annual Report
- is attached to the email submission
- can be found at the following publicly available 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:

While Grafton employs street sweeping and catch basin cleaning within the Flint Pond Watershed, current non-structural control practices are not performed to a level that would substantially affect phosphorus reduction crediting, per the MS4 requirements. While the Town may choose to enhance and credit these practices in future permit years, no credit for non-structural controls is currently being taken.

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:

In previous Permit Year(s) Grafton made the following changes:

- "Quinsigamond Ave" in the NOI was replaced with Quinsigamond River in the SWMP for clarification. That distinction did not change relevant impairments or TMDLs.

- Specific updates made in Permit Year 2 based on the 2016 impaired waters list include the following:

- Cronin brook is now listed as impaired for E. Coli. The Massachusetts 303d list notes "New segment - Impairment added based on new data/assessment."
- Flint Pond is now listed as impaired for nutrient/Eutrophication Biological Indicators. The Massachusetts 303d list notes, "New impairment, covered under existing TMDL [CN 115.0, 6/28/2002], added to this segment for 2016."
- Blackstone River (51-03 segment) impairments were updated to include Oil & Grease/PAH. While not included in Appendix 2 of the 2016 impaired waters list, Foam/Flocs/Scum/Oil Slicks has been removed and Oil and Grease and Flocculant Masses has been added, so this clarification was made in Grafton's list of impaired waterbodies.

These impairments were already included elsewhere in the SWMP, so did not change regulatory requirements for Grafton.

Specific updates made in Permit Year 4 based on the 2018/2020 impaired waters list include the following:

- West River is now listed as impaired for Fanwort, Non-Native Aquatic Plants, Lack of a coldwater assemblage, Temperature. The Massachusetts 303d list notes "Pollution impairment added due to new data/assessment."
- Blackstone River (51-03 segment) impairments were updated to include Curly-leaf Pondweed, Non-Native Aquatic Plants, and Indicators, and to remove Ambient Bioassays - Chronic Aquatic Toxicity and Other Organics.
- Blackstone River (51-04 segment) impairments were updated to include Water Chestnut.
- Quinsigamond River (51-09 segment) impairments were updated to include Curly leaf pondweed, Fanwort, and Benthic macroinvertebrates
- Cronin Brook impairments were updated to include Temperature.
- Lake Ripple impairments were updated to include Fanwort and Water Chestnut and to remove Non-native aquatic plants.
- Hayes Pond impairments were updated to include Fanwort and to remove Non-native aquatic plants.
- Flint Pond (South Basin) impairments were updated to include Fanwort.

Specific updates made in Permit Year 5 include:

- Added newly mapped outfalls to to the online MS4 viewer (outfall IDs 591, 592, and 593). These outfalls discharge to waterbodies already introduced in the NOI.
- There were no changes in impairments for receiving waterbodies within the Town based on MassDEP's 2022 List of Impaired Waters.

These changes are reflected in the SWMP, which Grafton updated and confirmed on 6/30/23.

Specific updates made in Permit Year 6 include:

- Cleaned up our data management approach and made outfalls that were discharging "internally" within a piped drainage system (i.e., to a BMP) not count as "final" outfalls since they are part of a larger drainage system. This new approach allows us to track catchment investigations more accurately. This approach changed the number of outfalls discharging to receiving waters, and these changes are reflected in the SWMP, which Grafton updated and confirmed on 6/30/24.
- There were no changes in impairments for receiving waterbodies within the Town.

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: 1-1: Stormwater Management Webpage

Message Description and Distribution Method:

Grafton continued to maintain its stormwater webpage on the Town's Conservation Commission website. The webpage includes information for the residents, Businesses, Institutions, and Commercial Facilities, Industrial Facilities, Developers (construction) about pollution prevention best practices.

The website serves as a repository for stormwater information including the SWMP, IDDE Plan, and a Stormwater Factsheet. It also includes an informational video from Think Blue Massachusetts (BMP 1-2) and resources for pollution prevention best practices. The website address is:

<http://grafton-ma.gov/521/Stormwater-Management-Program-SWMP>

Targeted Audience: Residents, Businesses, Institutions and Commercial Facilities, Industrial Facilities, and I

Responsible Department/Parties: DPW, Conservation, Planning

Measurable Goal(s):

No comments received on SWMP.

Message Date(s): Message is 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: 1-2: Think Blue Massachusetts Advertising Campaign

Message Description and Distribution Method:

Think Blue Massachusetts (<https://www.thinkbluemassachusetts.org/>) ran an advertising campaign on behalf of MS4 communities from May 31 to June 25th, 2018. The "Fowl Water" advertisement, targeting MA urban residents, aimed to help viewers visualize stormwater pollution from motor oil, pet waste, and trash. Think Blue targeted outreach to Central Massachusetts Regional Stormwater Coalition communities. Results of the advertising campaign can be found at: <https://docs.wixstatic.com/ugd/>

e78125_4e7851a031a34fd49b24c85a0e690c7d.docx?dn=TOC-TBM-Central-Massachusetts-Campaign-Report-06252018.docx.

Grafton will amplify the “Fowl Water” message by adding Think Blue Massachusetts links on Grafton’s stormwater management webpage (BMP 1-1).

Targeted Audience: Residents

Responsible Department/Parties: Massachusetts Statewide Stormwater Coalition

Measurable Goal(s):

Social media views in Central Massachusetts region.

Message Date(s): May 31 to June 25th, 2018 (BMP completed in Permit Year 1)

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: 1-3: Stormwater 101 Educational Message

Message Description and Distribution Method:

Grafton distributed the Stormwater 101 educational message from Think Blue Massachusetts to residents through tax bills.

Targeted Audience: Residents, Businesses, Institutions and Commercial facilities

Responsible Department/Parties: DPW, Conservation and Planning

Measurable Goal(s):

Educational messages distributed to all real estate tax payers.

Message Date(s): BMP completed in Permit Years 2, 3, and 4.

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: 1-5: Septic System Educational Message

Message Description and Distribution Method:

Grafton distributed an annual septic system educational message alongside tax forms in February 2024.

Targeted Audience: Residents / septic system owners

Responsible Department/Parties: Board of Health, DPW

Measurable Goal(s):

2,498 flyers were distributed with tax forms on February 8, 2024

Message Date(s): February 8, 2024

Message Completed for: Appendix F Requirements Appendix H Requirements

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

If yes, describe why the change was made:

Grafton added this BMP upon clarification of permit requirement.

BMP: 1-6: Dog Owner Education

Message Description and Distribution Method:

Dogs that are older than 6 months must be licensed by June 1st in Grafton. During Permit Year 1, Grafton evaluated options for distributing educational messages to dog owners seeking or renewing dog licenses, which may occur in person or online. Starting in Permit Year 2, the Town Clerk distributed a fact sheet about pet waste management to dog owners seeking or renewing dog licenses and will continue to do so. Posted "clean up after your pets" reminder and infographic to Town of Grafton Planning and Conservation Departments Facebook page.

Targeted Audience: Residents, Dog Owners

Responsible Department/Parties: DPW, Town Clerk

Measurable Goal(s):

Approximately 30 pet waste management fact sheets were distributed to dog owners during license renewal or new issuances.

Message Date(s): Ongoing fact sheet distribution

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:

Grafton added this BMP upon additional impairments and clarification of permit requirement.

BMP: 1-8: Summer Message about Dog Waste Management

Message Description and Distribution Method:

Grafton posted educational information on the Town’s Planning/Conservation Facebook page and the Town’s main page about dog waste management.

Targeted Audience: Residents

Responsible Department/Parties: Conservation and Planning

Measurable Goal(s):

Posted online on Facebook page.
0 likes, 0 comments, 0 shares (481 followers for Facebook page).

Message Date(s): Facebook posts on June 6, 2024 and June 28, 2024.

Message Completed for: Appendix F Requirements Appendix H Requirements

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

If yes, describe why the change was made:

BMP: 1-9: Fall Message about Leaf Litter

Message Description and Distribution Method:

Grafton posted educational information on the Town’s Planning/Conservation Facebook page and the Town’s main page about leaf litter management.

Targeted Audience: Residents

Responsible Department/Parties: Conservation and Planning

Measurable Goal(s):

Posted online on Facebook page.
0 likes, 0 comments, 0 shares (481 followers for Facebook page).

Message Date(s): October 13, 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:

BMP:1-4: Stormwater and LID Fact Sheets

Message Description and Distribution Method:

Grafton Planning Department distributed stormwater management and low-impact development (LID) fact sheets at Grafton’s Development Team Meetings with prospective applicants, such as engineers representing developers, and as part of pre-application review meetings. Pre-application review meetings are being held in a hybrid manner, so Grafton directs applicants to fact sheets on the Grafton Stormwater Management Webpage (see BMP 1-1).

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

During virtual pre-application review meetings, applicants directed to the Stormwater Management Webpage (see BMP 1-1).

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:

Since the NOI, this message was made more specific, the approach updated (webpage), and assigned to Planning, instead of DPW because of applicability.

BMP:1-7: Spring Message about Grass Clippings and Fertilizer

Message Description and Distribution Method:

Grafton posted educational information on the Town’s Planning/Conservation Facebook page and the Town’s main page about best practices for grass clippings and fertilizer.

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

Posted online on Facebook page.
0 like, 0 comments, 0 shares (481 followers for Facebook page).

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:

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:**

Grafton posted its SWMP online to allow for ongoing public review of its SWMP. When a new version of the SWMP became available, Grafton posted on social media and the Town website to notify the public that the SWMP was available for review. Grafton provided an email link on the website to stormwater@grafton-ma.gov to allow the public to submit their feedback on the SWMP. No comments were made in Permit Year 6. The SWMP was posted at: <http://grafton-ma.gov/521/Stormwater-Management-Program-SWMP>

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

Describe any other public involvement or participation opportunities conducted **during this reporting period:**

Department of Public Works provided trash removal for Grafton town-wide volunteer cleanup event, held on Saturday, April 20, 2024. 40 cubic yards worth of material were collected and removed.

Residents can go to New England Disposal Technologies (NEDT) in Sutton, MA to dispose of hazardous waste at any time due to a contract agreement with the Town of Grafton.

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

Percent of Phase II map complete: 50

Optional: Provide additional status information regarding your map:

Grafton completed the Phase I map by 6/30/20 based on available information. Grafton continues to update the system map as new information is identified and/or new infrastructure is installed as part of the Phase II mapping effort through catchment investigations and as-built mapping.

Screening of Outfalls/Interconnections

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

- No outfalls were inspected
- The above referenced outfall screening data is attached to the email submission
- The above referenced outfall screening data can be found at the following publicly available website:

<https://vhb.maps.arcgis.com/apps/webappviewer/index.html?id=9e7d127e6b934026bf68e193937a650d>

[http://grafton-ma.gov/DocumentCenter/View/9491/Grafton_IDDE_Plan_FY23-rev?bidId=\(in IDDE Plan, published June 30, 2024\)](http://grafton-ma.gov/DocumentCenter/View/9491/Grafton_IDDE_Plan_FY23-rev?bidId=(in%20IDDE%20Plan,%20published%20June%2030,%202024))

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

Number of outfalls screened: 9

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

Percent of outfalls screened: 97

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

We continue to map the drainage system and are adding outfalls if any new ones are identified and including them in our IDDE program, which is they the % of outfalls screened is not 100%.

Catchment Investigations

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

- No catchment investigations were conducted
- The catchment investigation data is attached to the email submission
- The catchment investigation data can be found at the following publicly available website:

<https://vhb.maps.arcgis.com/apps/webappviewer/index.html?id=9e7d127e6b934026bf68e193937a650d>

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

Number of catchment investigations completed this reporting period: 16

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

Percent of total catchments investigated: 100

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

To date, Grafton has initiated 86 catchment investigations out of 86 required. Of the 86 initiated, 54 are complete (63% complete) and the remaining 32 are in progress.

IDDE Progress

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

- No illicit discharges were found
- The illicit discharge removal report is attached to the email submission
- The illicit discharge removal report can be found at the following publicly available website:

[Redacted text box]

*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:

[Redacted text box]

Employee Training

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

Two Grafton employees attended the Baystate Roads Training on IDDE on February 29, 2024.

[Redacted text box]

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: 11

Number of inspections completed: 15

Number of enforcement actions taken: 1

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

[Empty text box for optional information]

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

Ordinance or Regulatory Mechanism

Date update was completed (due in year 3): June 2021

Website of ordinance or regulatory mechanism: <https://www.grafton-ma.gov/520/Stormwater-Bylaw>

As-built Drawings

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

Number of as-built drawings received: 5

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

[Empty text box for optional information]

Street Design and Parking Lots Report

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

During Permit Year 6, Grafton reviewed comments and proposed edits to the bylaws and regulations so that low impact development (including minimization of impervious area, more green infrastructure, treatment for streets and parking lots, etc.) is more easily integrated into projects built in the Town. The Planning Board discussed edits at a posted meeting prior to circulating to staff and the Town’s peer review engineer for comment and discussion at inter-departmental meetings. Grafton then met with the Town’s stormwater consultant to discuss a final version of comments to present to the Board. This upcoming year, the Town’s stormwater consultant plans to incorporate comments as redline edits into the bylaws and regulations.

Green Infrastructure Report

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

During Permit Year 6, Grafton reviewed comments and proposed edits to the bylaws and regulations so that low impact development (including minimization of impervious area, more green infrastructure, treatment for streets and parking lots, etc.) is more easily integrated into projects built in the Town. The Planning Board discussed edits at a posted meeting prior to circulating to staff and the Town's peer review engineer for comment and discussion at inter-departmental meetings. Grafton then met with the Town's stormwater consultant to discuss a final version of comments to present to the Board. This upcoming year, the Town's stormwater consultant plans to incorporate comments as redline edits into the bylaws and regulations.

Retrofit Properties Inventory

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

32 Deernolm Street, Grafton, MA
 Grafton Municipal Center, 30 Providence Road, Grafton MA 01519
 North Grafton Elementary School, 46 Waterville St, North Grafton, MA 01536
 South Grafton Elementary School, 90 Main St, South Grafton, MA 01560

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

Grafton Police Department, 28 Providence Road, Grafton MA 01519 - An existing detention basin located in front of the police department was retrofitted into an infiltration basin by modifying the outlet control structure. The Town confirmed appropriate soils for infiltration and modeling was performed to confirm control of peak rates.

Old Westboro Rd, Grafton, MA 01519 - A pervious area along the road was identified as an area that receives sheetflow and qualifies as impervious cover disconnection. This area has been documented as a stormwater BMP in the Grafton stormwater database and will be maintained by the Town.

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: 804

Number of catch basins cleaned: 790

Total volume or mass of material removed from all catch basins: 551 cubic yards

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

Total number of catch basins: 2,228

If applicable:

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

Please note: the total number of catch basins in the MS4 system refers to the total number of inlets, even those that have null grate information at this point in time, in order to be most conservative. Please note that this assumption most likely includes more inlets than necessary for MS4 tracking at this point in time. In future years, this number of catch basins may decrease as more information is gathered on the asset during mapping updates.

Street Sweeping

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

- Number of miles cleaned: 93
- Volume of material removed: [Select Units]
- Weight of material removed: [Select Units]

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:

As discussed in previous permit years, Grafton does not have any maintenance garages, public works yards, transfer stations, and other waste handling within the MS4 regulated area or that drains to MS4 regulated area; therefore no SWPPPs are required for Grafton under the MS4 Permit. As indicated in EPA's Response to Comments on the MS4 permit document, "municipal facilities outside of the MS4 area are not subject to the good housekeeping requirements at part 2.3.7."

Additional Information

Monitoring or Study Results

Results from any other stormwater or receiving water quality monitoring or studies conducted during the reporting period not otherwise mentioned above, where the data is being used to inform permit compliance or permit effectiveness must be attached.

- Not applicable

- The results from additional reports or studies are attached to the email submission
- The results from additional reports or studies can be found at the following publicly available website(s):

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

Additional Information

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

Bonus educational messages for MCM 1 - Grafton is part of the Central Massachusetts Regional Stormwater Coalition which performed social media posts to educate the public on stormwater management. A summary of their outreach is here:

- Winter deicing - daily messages 11/1/23 - 4/28/24 - Facebook (3 posts, 10 likes/reactions, 1,228 reach), Instagram (3 posts, 3 like/reaction, 27 reach), Twitter (26 posts, 8 like/reaction, 1,194 reach).
- Lawn care - daily messages 3/1/24 - 5/31/24 - Facebook (25 posts, 45 likes/reactions, 4,842 reach), Instagram (17 posts, 9 like/reaction, 136 reach), Twitter (79 posts, 10 like/reaction, 1,721 reach).
- Leaf/yard waste - daily messages 10/1/23 - 11/30/23 - Facebook (2 posts, 1 likes/reactions, 693 reach), Instagram (2 posts, 1 like/reaction, 7 reach), Twitter (6 posts, 0 like/reaction, 707 reach).
- BMPs for residents - daily messages 10/1/23 - 6/30/24 - Facebook (83 posts, 149 likes/reactions, 15,274 reach), Instagram (72 posts, 32 like/reaction, 518 reach), Twitter (460 posts, 71 like/reaction, 1,368 reach).
- BMPs for commercial businesses - daily messages 10/1/23 - 6/30/24 - Facebook (4 posts, 7 likes/reactions, 427 reach), Instagram (3 posts, 1 like/reaction, 21 reach), Twitter (30 posts, 1 like/reaction, 750 reach).
- BMPs for industries - daily messages 10/1/23 - 6/30/24 - Facebook (15 posts, 22 likes/reactions, 2,274 reach), Instagram (6 posts, 2 like/reaction, 43 reach), Twitter (63 posts, 6 like/reaction, 2,840 reach).
- BMPs for developers and contractors - daily messages 10/1/23 - 6/30/24 - Facebook (8 posts, 12 likes/reactions, 1,761 reach), Instagram (8 posts, 1 like/reaction, 48 reach), Twitter (36 posts, 4 like/reaction, 2,128 reach).

Year 7

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

Yes, I agree

- Complete investigations of catchments associated with Problem Outfalls

- Complete investigations of catchments where any information gathered on the outfall/interconnection identifies sewer input

Annual Requirements

- Annual report submitted and available to the public
- Annual opportunity for public participation in review and implementation of SWMP
- Keep records relating to the permit available for 5 years and make available to the public
- Properly store and dispose of catch basin cleanings and street sweepings so they do not discharge to receiving waters
- Annual training to employees involved in IDDE program
- Update inventory of all known locations where SSOs have discharged to the MS4
- Continue public education and outreach program
- Update outfall and interconnection inventory and priority ranking and include data collected in connection with the dry weather screening and other relevant inspections conducted
- Implement IDDE program
- Review site plans of construction sites as part of the construction stormwater runoff control program
- Conduct site inspection of construction sites as necessary
- Inspect and maintain stormwater treatment structures
- Log catch basins cleaned or inspected
- Sweep all curbed streets at least annually
- Continue investigations of catchments associated with Problem Outfalls
- Implemented SWPPPs for all permittee owned or operated maintenance garages, public works yards, transfer stations, and other waste handling facilities
- Review inventory of all permittee owned facilities in the categories of parks and open space, buildings and facilities, and vehicles and equipment; update if necessary
- Review O&M programs for all permittee owned facilities; update if necessary
- Implement all maintenance procedures for permittee owned facilities in accordance with O&M programs
- Implement program for MS4 infrastructure maintenance to reduce the discharge of pollutants
- Enclose all road salt storage piles or facilities and implemented winter road maintenance procedures to minimize the use of road salt
- Review as-built drawings for new and redevelopment to ensure compliance with post construction bylaws, regulations, or regulatory mechanism consistent with permit requirements
- Inspect all permittee owned treatment structures (excluding catch basins)
- Identify additional permittee-owned properties that could potentially be modified or retrofitted with BMPs to reduce impervious areas so that the permittee maintains a minimum of 5 sites in their inventory, until such a time when the permittee has less than 5 sites remaining

Provide any additional details on activities planned for permit year 7 below:



Part V: Certification of Small MS4 Annual Report 2024

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]

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: MassDEP:

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

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