

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

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

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

Part I: Contact Information

Name of Municipality or Organization:

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. Make sure you are referring to the most recent EPA approved Section 303(d) Impaired Waters List which can be found here: <https://www.epa.gov/tmdl/region-1-impaired-waters-and-303d-lists-state>

Impairment(s)

Bacteria/Pathogens Chloride Nitrogen Phosphorus
 Solids/ Oil/ Grease (Hydrocarbons)/ Metals

TMDL(s)

In State: Assabet River Phosphorus Bacteria and Pathogen Cape Cod Nitrogen
 Charles River Watershed Phosphorus Lake and Pond Phosphorus

Out of State: Bacteria/Pathogens Metals Nitrogen Phosphorus

Clear Impairments and TMDLs

Next, check off all requirements below that have been completed. **By checking each box you are certifying that you have completed that permit requirement fully.** If you have not completed a requirement leave the box unchecked. Additional information will be requested in later sections.

Year 2 Requirements

- Completed Phase I of system mapping
- Developed a written catchment investigation procedure and added the procedure to the SWMP
- Developed written procedures to require the submission of as-built drawings and ensure the long term operation and maintenance of completed construction sites and added these procedures to the SWMP
- Enclosed or covered storage piles of salt or piles containing salt used for deicing or other purposes
- Developed written operations and maintenance procedures for parks and open space, buildings and facilities, and vehicles and equipment and added these procedures to the SWMP
- Developed an inventory of all permittee owned facilities in the categories of parks and open space, buildings and facilities, and vehicles and equipment and added this inventory to the SWMP
- Completed a written program for MS4 infrastructure maintenance to reduce the discharge of pollutants
 - Developed written SWPPPs, included in the SWMP, for all of the following permittee owned or operated facilities: maintenance garages, public works yards, transfer stations, and other waste handling facilities where pollutants are exposed to stormwater

Optional: If you would like to describe progress made on any incomplete requirements listed above, provide any additional information, and/or if any of the above year 2 requirements could not be completed due to the impacts of COVID-19, please identify the requirement that could not be completed, any actions taken to attempt to complete the requirement, and reason the requirement could not be completed below:

COMMENT The following requirements could not be completed due to resource limitations caused by COVID-19. Phase I mapping of outfalls and receiving waters has been done and SUEZ plans to work with the City and its consultant to complete Phase I mapping by June 2021, using the outfall catchment mapping and

ranking tool developed by MAPC.

Due to COVID-19 concerns, SUEZ operated with alternating shifts at 50% staffing levels for much of the spring and prioritized maintaining wastewater treatment facility performance over other activities. This resulted in staff not being allocated to catch basin cleaning; however, staffing levels have returned to normal and catch basin cleaning activities have been resumed. Compliance is anticipated during Year 3.

The City had scheduled inventory of City owned facilities and development of written O&M plans for the spring of 2020; however, the onset of the COVID-19 pandemic resulted in many City staff members working remotely and with reduced hours to deter potential exposure. In addition, the potential to interface with multiple City departments that would be necessary to develop and implement these procedures was significantly curtailed by COVID. Lastly, the illness, hospitalization and extended treatment program for the City's MS4 Program Manager significantly reduced the City's ability to comply with these requirements. It is the City's expectation that compliance with these requirements will be achieved in year 3.

Annual Requirements

- Provided an opportunity for public participation in review and implementation of SWMP and complied with State Public Notice requirements
- Kept records relating to the permit available for 5 years and made available to the public
- The SSO inventory has been updated, including the status of mitigation and corrective measures implemented
 - This is not applicable because we do not have sanitary sewer
 - This is not applicable because we did not find any new SSOs
 - The updated SSO inventory is attached to the email submission
 - The updated SSO inventory can be found at the following website:

<https://storage.googleapis.com/proudcity/holyokema/uploads/2020/04/ILLICIT-DISCHARGE-DETECTION-AND-ELIMINATION-IDDE-PROGRAM.pdf>

- Properly stored and disposed of catch basin cleanings and street sweepings so they did not discharge to receiving waters
- Provided training to employees involved in IDDE program within the reporting period
- All curbed roadways were swept at least once within the reporting period
- Updated outfall and interconnection inventory and priority ranking as needed

Optional: If you would like to describe progress made on any incomplete requirements listed above, provide any additional information, and/or if any of the above annual requirements could not be completed due to the impacts of COVID-19, please identify the requirement that could not be completed, any actions taken to attempt to complete the requirement, and reason the requirement could not be completed below:

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

Annual Requirements

*Public Education and Outreach**

- Annual message was distributed encouraging the proper management of pet waste, including noting any existing ordinances where appropriate
- Permittee or its agents disseminated educational material to dog owners at the time of issuance or renewal of dog license, or other appropriate time
- Provided information to owners of septic systems about proper maintenance in any catchment that discharges to a water body impaired for bacteria

** Public education messages can be combined with other public education requirements as applicable (see Appendix H and F for more information)*

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

Nitrogen (Combination of Impaired Waters Requirements and TMDL Requirements as Applicable)

Annual Requirements

*Public Education and Outreach**

- Distributed an annual message in the spring (April/May) that encourages the proper use and disposal of grass clippings and encourages the proper use of slow-release fertilizers
- Distributed an annual message in the summer (June/July) encouraging the proper management of pet waste, including noting any existing ordinances where appropriate
- Distributed an annual message in the fall (August/September/October) encouraging the proper disposal of leaf litter

** Public education messages can be combined with other public education requirements as applicable (see Appendix H and F for more information)*

Good Housekeeping and Pollution Prevention for Permittee Owned Operations

- Increased street sweeping frequency of all municipal owned streets and parking lots subject to Permit part 2.3.7.a.iii.(c) to a minimum of two times per year (spring and fall)

Potential structural BMPs

Any structural BMPs listed in Table 3 of Attachment 1 to Appendix H already existing or installed in the regulated area by the permittee or its agents was tracked and the nitrogen removal by the BMP was estimated consistent with Attachment 1 to Appendix H. The BMP type, total area treated by the BMP, the design storage volume of the BMP and the estimated nitrogen removed in mass per year by the BMP were documented.

- The BMP information is attached to the email submission
- The BMP information can be found at the following website:

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

City owned school parking lots are swept twice a year but other City owned parking lots have not yet been included in the City's sweeping program. Approximately 70% of all municipal roads located within the MS4 area were swept two times. Due to timing and staff shortages caused by alternating shifts in response to COVID-19, some of the roads located in west Holyoke were only swept once. All Holyoke Public School parking lots were swept.

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:

2019 Annual Report documented: 1) addition of two outfalls that direct stormwater to an unnamed tributary that flows to Pequot Pond (located in Southamptn MA) when mapping focused on outfalls that connect to water bodies outside of Holyoke and 2) removal of outfalls associated with CSOs, one outfall to a perennial stream feeding the whiting Street Reservoir, two outfalls to wetlands associated with Broad Brook, eight outfalls associated with Day Brook, five outfalls with Green Brook and 3) reassignment of four outfalls affiliated with Tannery Brook to Schoolhouse Brook.

2020 Removed TSS impairment for Connecticut River Segment MA34-04; and solids from Connecticut River Segment MA35-05.

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:**

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. Think Blue Connecticut River Website

Message Description and Distribution Method:

See: <https://thinkblueconnecticutriver.org/wp-content/uploads/2020/09/CT-River-SWC-Annual-Report-Narrative-MCM-1-.pdf>

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

1,477 people visited the Think Blue Connecticut River website during Year 2 and spent an average of 1 minute, 53 seconds on viewing a total of 3,252 pages on stormwater best practices.

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:

The website was not mentioned in the NOI and SWMP, but with development now completed is most central to all messaging in the region.

BMP: #2. Covid-19 litter

Message Description and Distribution Method:

See: <https://thinkblueconnecticutriver.org/wp-content/uploads/2020/09/CT-River-SWC-Annual-Report-Narrative-MCM-1-.pdf>

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

PVPC April 10 Facebook post: 3,450 impressions, 1,234 engagements, and 19 likes and 124 shares
WWLP, Channel 22 news story views and blog post views could not be obtained, but these numbers are likely

in the thousands or tens of thousands.

Message Date(s): April 2020

Message Completed for: Appendix F Requirements Appendix H Requirements

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

If yes, describe why the change was made:

This Covid-19 related litter messaging was not mentioned in the NOI and SWMP, but was seen as important addition and completed as part of Year 2 messaging in the region.

BMP:#3. Cigarette butts

Message Description and Distribution Method:

See: <https://thinkblueconnecticutriver.org/wp-content/uploads/2020/09/CT-River-SWC-Annual-Report-Narrative-MCM-1-.pdf>

Targeted Audience: Residents

Responsible Department/Parties: Connecticut River Stormwater Committee

Measurable Goal(s):

NA for this reporting period – postponed to Year 3

Message Date(s): NA for this reporting period

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:

Postponed to Year 3 and rather than messaging through use of PVTA bus panels, decided to message with large decals on public works vehicles throughout the region.

BMP:#4. Dumpster waste and avoiding contaminated flows message

Message Description and Distribution Method:

See: <https://thinkblueconnecticutriver.org/wp-content/uploads/2020/09/CT-River-SWC-Annual-Report-Narrative-MCM-1-.pdf>

Targeted Audience: Businesses, institutions, and commercial facilities

Responsible Department/Parties: Connecticut River Stormwater Committee

Measurable Goal(s):

NA for this reporting period – postponed to Year 3

Message Date(s): NA for this reporting period

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:

Aside from postponing message from Year 2 to Year 3, we learned in the process of developing the campaign that distribution of flyers directly to dumpster companies to provide to customers was not going to be a fruitful strategy. Better to work with Boards of Health to inform them and then get them to distribute the information to dumpster companies (who are allowed/permitted by boards to operate in the community) and to businesses when health agents they are doing routine inspections. The education and outreach effort became two pronged and now includes an additional flyer specifically for Boards of Health. Given Covid-19 and the demands on Boards of Health during this time, there is agreement among committee members that the best approach will be two pronged for Year 3:

- Post information on Think Blue Connecticut River website with the two PDF documents/flyers on dumpsters, along with a checklist for Boards of Health to use when inspecting restaurants and looking at dumpsters and oil storage.
- Prepare article for MA Health Officers Association Executive Director to announce resources about dumpsters to memberships in the Western MA Public Health Association and the MA Environmental Health Association.

For now, we will put on hold the idea of individual visits with boards of health in each member community to provide brief presentation and stress importance of this work in reducing contaminated stormwater flows.

BMP:#5. New MS4 development standards and erosion and sediment control

Message Description and Distribution Method:

See: <https://thinkblueconnecticutriver.org/wp-content/uploads/2020/09/CT-River-SWC-Annual-Report-Narrative-MCM-1-.pdf>

Targeted Audience: Developers

Responsible Department/Parties: Connecticut River Stormwater Committee

Measurable Goal(s):

NA for this reporting period – postponed to Year 3

Message Date(s): NA for this reporting period

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:

Given the tremendous opportunity provided by this conference, the Connecticut River Stormwater Committee,

is moving this messaging to Year 3. Emphasis will likely be on erosion and sediment control and will depend in part on status of ongoing work between MassDEP and EPA to better align MS4 permit and Wetlands Protection Act.

BMP:#6. Erosion and sediment control

Message Description and Distribution Method:

See: <https://thinkblueconnecticutriver.org/wp-content/uploads/2020/09/CT-River-SWC-Annual-Report-Narrative-MCM-1-.pdf>

Targeted Audience: Developers and drainlayers specifically

Responsible Department/Parties: Connecticut River Stormwater Committee

Measurable Goal(s):

Letters and brochure sent to nine drainlayers in the region that are operating specifically in East Longmeadow.

Message Date(s): Letters sent spring of 2020

Message Completed for: Appendix F Requirements Appendix H Requirements

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

If yes, describe why the change was made:

This was an additional message that some communities chose to do, but was not originally part of the Connecticut River Stormwater Committee NOI/SWMP

BMP:#7. Fleet maintenance to avoid spills and leaks

Message Description and Distribution Method:

See: <https://thinkblueconnecticutriver.org/wp-content/uploads/2020/09/CT-River-SWC-Annual-Report-Narrative-MCM-1-.pdf>

Targeted Audience: Industrial facilities

Responsible Department/Parties: Connecticut River Stormwater Committee

Measurable Goal(s):

NA for this reporting period – postponed to Year 3

Message Date(s): NA for this reporting period

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:

Postponed to Year 3 given likelihood of message getting lost in the mix during all the information around Covid-19 best practices and the struggle for industrial facilities to continue operations during the pandemic.

BMP:#8. Proper disposal of leaf litter

Message Description and Distribution Method:

See: <https://thinkblueconnecticutriver.org/wp-content/uploads/2020/09/CT-River-SWC-Annual-Report-Narrative-MCM-1-.pdf>

Targeted Audience: Residents

Responsible Department/Parties: Connecticut River Stormwater Committee

Measurable Goal(s):

Boosted Facebook posts that reached a total of 6,903 people, 353 of whom clicked to the link provided for more information. It is important to note here that Facebook posts present ongoing challenges. Despite best efforts, the 3rd boosted post in this series was taken down by Facebook part way through and the 4th post blocked for boosting by zip code altogether. This led to a month-long verification process for PVPC staff with Facebook.

Article in PVPC's Regional Reporter that received views from 883 people, 29 of whom clicked to the link provided for more information.

Message Date(s): Facebook posts ran mid-October through mid-November; article in PVPC's Regional Reporter October and November issues

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:

Proposal had been for one social media post and press release. Given the cohesion of these social media messages as a whole, the Connecticut River Stormwater Committee decided to run the full series and instead of a media release, developed a one-page document on best practices to which all posts could link.

BMP:#9. Importance of soil test, proper use of fertilizers, disposal of grass clippings

Message Description and Distribution Method:

See: <https://thinkblueconnecticutriver.org/wp-content/uploads/2020/09/CT-River-SWC-Annual-Report-Narrative-MCM-1-.pdf>

Targeted Audience: Residents

Responsible Department/Parties: Connecticut River Stormwater Committee

Measurable Goal(s):

Boosted Facebook post reached 5,922 people, 110 of whom clicked to the website link for more information. Analytics indicate that the average time spent by visitors on that resource page was nearly 4 minutes. Article in PVPC’s Regional Reporter that received views from 431 people, 15 of whom clicked to the link provided for more information.

Message Date(s): Facebook post on May 21, 2020; article in PVPC’s Regional Reporter May issue

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:

Proposed work had included creating a brochure. Instead, work entailed improving the Think Blue Connecticut River web page on lawn care so that information and resources are all more readily available during Covid-19.

BMP:#10. Proper management of pet waste

Message Description and Distribution Method:

See: <https://thinkblueconnecticutriver.org/wp-content/uploads/2020/09/CT-River-SWC-Annual-Report-Narrative-MCM-1-.pdf>

Targeted Audience: Residents

Responsible Department/Parties: Connecticut River Stormwater Committee

Measurable Goal(s):

The boosted Facebook posts reached 15,552 people who followed through with 406 clicks. The articles placed in 6 issues of PVPC’s Regional Reporter were viewed by 2,740 people, 48 of whom clicked to a link for more information. A MassLive banner provided 175,015 impressions with 296 clicks to more information. During Year 2, Think Blue Connecticut River pet waste page on the website had 730 page views with the analytics indicating that the average time spent by visitors on that resource page was 1 minute and 33 seconds. Of the 189 visitors who proceeded to the pick up pet waste pledge, 70% or 122 people made the commitment to pick up pet waste.

Message Date(s):

- For summer 2019 message, issued posters and Facebook post on July 30, 2019 (pledge was not yet set up); also placed article in PVPC’s Regional Reporter (summer and September).
- Time of licensing 2020, Facebook posts on January 31, February 3, February 6, and boosted post by zip code on February 10; also placed article in PVPC’s Regional Reporter (February, March, and April).
- Electronic and direct mail distribution of post cards during February and March
- For Covid-19 messaging, Facebook post boosted by zip code on April 8
- For summer 2020 message, MassLive Banner ad from June 25 through July 24; also placed article in PVPC’s Regional Reporter (summer)

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:

To provide additional messaging.

The NOI/SWMP indicated pet waste messaging only in summer months as PVPC understood that messaging under the Appendixes could be combined. EPA has indicated that additional messaging to dog owners “at time of licensing” is required. Messaging at time of licensing Connecticut River Stormwater Committee Annual Report page 15 has been added in Year 2, along with additional messaging on pet waste during “stay at home” orders with the pandemic given the increased visibility of associated problems.

BMP:#11. Proper septic system care

Message Description and Distribution Method:

See: <https://thinkblueconnecticutriver.org/wp-content/uploads/2020/09/CT-River-SWC-Annual-Report-Narrative-MCM-1-.pdf>

Targeted Audience: Residents

Responsible Department/Parties: Connecticut River Stormwater Committee

Measurable Goal(s):

Boosted Facebook posts reached 1,586 people, 176 of whom clicked to the website link for more information. Analytics on the Think Blue Connecticut River web page on septic system care indicate that the average time spent by visitors on that resource page was just over 2 minutes.

Message Date(s): September 16, 2019

Message Completed for: Appendix F Requirements Appendix H Requirements

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

If yes, describe why the change was made:

The NOI/SWMP indicated septic system messaging would be done in Year 3 only as MS4 permit language in Appendix H was not entirely clear on the timing of this message. EPA has since indicated that septic system messaging must occur each year and the Connecticut River Stormwater Committee has adjusted accordingly.

BMP:#12. Proper disposal of leaf litter

Message Description and Distribution Method:

See: <https://thinkblueconnecticutriver.org/wp-content/uploads/2020/09/CT-River-SWC-Annual-Report-Narrative-MCM-1-.pdf>

Targeted Audience: Businesses/institutions/commercial facilities

Responsible Department/Parties: Connecticut River Stormwater Committee

Measurable Goal(s):

Mailing to 120 professional land care companies operating in Stormwater Committee member municipalities

Message Date(s): November 4, 2019

Message Completed for: Appendix F Requirements Appendix H Requirements

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

If yes, describe why the change was made:

BMP:#13. Importance of soil test, proper use of fertilizers, disposal of grass clippings

Message Description and Distribution Method:

See: <https://thinkblueconnecticutriver.org/wp-content/uploads/2020/09/CT-River-SWC-Annual-Report-Narrative-MCM-1-.pdf>

Targeted Audience: Business/institutions/commercial facilities

Responsible Department/Parties: Connecticut River Stormwater Committee

Measurable Goal(s):

Workshop invitation mailing to 130 professional land care companies operating in Stormwater Committee member municipalities

Message Date(s): November 4, 2019

Message Completed for: Appendix F Requirements Appendix H Requirements

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

If yes, describe why the change was made:

This in-person workshop had been planned for April 1 and an invitation issued to landscapers in the region. With the emergence of Covid-19 the workshop was going to be moved to the Zoom virtual meeting platform, but there was little interest expressed from landscapers. Mary Owen of UMass Extension and Hotze Wijnja of MassDAR recommended cancellation of the event as the industry was in upheaval with the pandemic. Also, the audience here was intended to be large institutions with lawns, but some difficulty in identifying these places in practice. For year 3, plan to conduct workshop and invite both these audiences.

BMP:#14. Proper management of goose waste - businesses

Message Description and Distribution Method:

See: <https://thinkblueconnecticutriver.org/wp-content/uploads/2020/09/CT-River-SWC-Annual-Report-Narrative-MCM-1-.pdf>

Targeted Audience: Businesses/institutions/commercial facilities

Responsible Department/Parties: Connecticut River Stormwater Committee

Measurable Goal(s):

Letters sent to owners of 25 properties with likely ongoing residential goose problems

Message Date(s): October 21, 2019

Message Completed for: Appendix F Requirements Appendix H Requirements

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

If yes, describe why the change was made:

Message initially planned for Year 1, but there was no existing recommended practice in place for landowners with goose problems. PVPC conferred with both MassWildlife and USDA Wildlife officials to devise a program of effective strategies.

BMP:#15. Proper management of pet waste

Message Description and Distribution Method:

See: <https://thinkblueconnecticutriver.org/wp-content/uploads/2020/09/CT-River-SWC-Annual-Report-Narrative-MCM-1-.pdf>

Targeted Audience: Businesses/institutions/commercial facilities

Responsible Department/Parties: Connecticut River Stormwater Committee

Measurable Goal(s):

Reporting back from Chambers was uneven, but hope is to smooth these lines of communications as this seems good way to reach this audience. Based on Chambers reporting back, newsletters with Poop Fairy article went to 3,295 businesses in the region.

Message Date(s): Various through June and July, 2020

Message Completed for: Appendix F Requirements Appendix H Requirements

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

If yes, describe why the change was made:

Had proposed to send letter describing resources directly to property owners with likely pet waste problems. Identifying these properties, however, was not practicable. Outreach through chambers of commerce seemed a more sound approach when it came time to issuing this message.

BMP:#16. Fowl Water messaging through state-wide campaign

Message Description and Distribution Method:

See: <https://thinkblueconnecticutriver.org/wp-content/uploads/2020/09/CT-River-SWC-Annual-Report->

Narrative-MCM-1-.pdf

Targeted Audience: Residents and businesses/institutions/commercial facilities

Responsible Department/Parties: Think Blue Massachusetts and Water Words that Work

Measurable Goal(s):

Water Words that Work reports that within the Connecticut River Stormwater Committee region: 1st campaign resulted in 1,009,224 Facebook and Instagram and 318,970 You Tube ad impressions; 2nd campaign resulted in 708,781 Facebook and Instagram and 619,562 You Tube ad impressions

Message Date(s): July 1 to July 12, 2019
May 16 to June 5, 2020

Message Completed for: Appendix F Requirements Appendix H Requirements

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

If yes, describe why the change was made:

This message is a welcome addition to our program for Year 2 and will be part of the region's SWMP update.

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 City's website.

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:**

A public meeting noticed in accordance with Massachusetts General Law was held by the Stormwater Authority on September 21, 2020. Ongoing compliance with the SWMP and MS4 permit requirements were discussed during this meeting.

In addition, public hearings are held by the Stormwater Authority for large projects, greater than 2,000 sf of repaving or new impervious area or 1 acre of site disturbance, as part of the permitting process.

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:

Number of SSOs removed:

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:

See comments in comment box for Part II Self Assessment.

Screening of Outfalls/Interconnections

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

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

An stormwater inspection was conducted by EPA inspectors on September 24, 2019. Five of the outfalls sampled were stormwater outfalls located within Holyoke's MS4.

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

Number of outfalls screened:

Catchment Investigations

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

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

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

Number of catchment investigations completed this reporting period:

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

Percent of total catchments investigated:

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

Due to staffing limits caused by COVID 19, the City requested an extension to Phase I mapping. Catchment investigations will begin as catchments are delineated.

IDDE Progress

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

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

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

Number of illicit discharges identified:

Number of illicit discharges removed:

Estimated volume of sewage removed: 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:

Total number of illicit discharges removed:

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

Employee Training

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

Training occurs annually. Employees were trained on the IDDE on September 4, 2020.

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: 26

Number of inspections completed: 39

Number of enforcement actions taken: 1

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

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

Ordinance or Regulatory Mechanism

Below, select the option that describes your ordinance or regulatory mechanism progress.

- Bylaw, ordinance, or regulations are updated and adopted consistent with permit requirements
- Bylaw, ordinance, or regulations are updated consistent with permit requirements but are not yet adopted
- Bylaw, ordinance, or regulations have not been updated or adopted

As-built Drawings

Describe the measures the MS4 has utilized to require the submission of as-built drawings and ensure long term operation and maintenance of completed construction sites:

Submission of as-built drawings has been a condition of the City's stormwater ordinance since 2010 and release of the required performance bond is not approved until the drawings have been received. In addition,

for projects that are also subject to Planning Board site plan approval requirements, issuance of a certificate of occupancy is not recommended until these drawings have been received.

All projects that are permitted under the City's stormwater ordinance are required to develop and implement a long-term O&M plan. "Large" projects, which are projects that involve more than 2,000 sf of repaving or new impervious surface or involve more than 1 acre of site disturbance, are required to execute a long-term O&M plan agreement with the City and file this agreement with the land records at the registry of deeds.

Street Design and Parking Lots Report

Describe the status of the street design and parking lots assessment due in year 4 of the permit term, including any planned or completed changes to local regulations and guidelines:

The City received funding through the Massachusetts Municipal Vulnerability Preparedness (MVP) Program in FY20 focused on inventorying and eventually reducing impervious cover and its impacts in the City. The first phase of the project has been completed, accurate mapping and inventorying of impervious cover has been completed and future activities will be focused on strategies and incentives to reduce this cover.

Green Infrastructure Report

Describe the status of the green infrastructure report due in year 4 of the permit term, including the findings and progress towards making the practice allowable:

Work on development of this report will begin in FY21.

Retrofit Properties Inventory

Describe the status of the inventory, due in year 4 of the permit term, of permittee-owned properties that could be modified or retrofitted with BMPs to mitigate impervious areas and report on any properties that have been modified or retrofitted:

Work on development of this inventory of this report will begin in FY21.

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:

Number of catch basins cleaned:

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

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

Total number of catch basins:

If applicable:

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

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: [Select Units]

O&M Procedures and Inventory of Permittee-Owned Properties

Below, check all that apply.

The following permittee-owned properties have been inventoried:

- Parks and open spaces
- Buildings and facilities
- Vehicles and equipment

The following O&M procedures for permittee-owned properties have been completed:

- Parks and open spaces
- Buildings and facilities
- Vehicles and equipment

Stormwater Pollution Prevention Plan (SWPPP)

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

Number of site inspections completed:

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

Additional Information

Monitoring or Study Results

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

- Not applicable
- The results from additional reports or studies are attached to the email submission
- The results from additional reports or studies can be found at the following website(s):

An Inspection of MS4 Stormwater was conducted by EPA on September 24, 2019.

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:

Eight locations were surveyed and sampled for salinity, temperature, conductivity, ammonia, chlorine, surfactants, E. coli, Enterococcus, and eight pharmaceutical and personal care products. Five of the sites were stormwater outfalls located within the Holyoke MS4, one was a CSO and two sites were stormwater outfalls located in West Springfield.

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:

COVID-19 Impacts

Optional: If any of the above year 2 requirements could not be completed due to the impacts of COVID-19, please identify the requirement that could not be completed, any actions taken to attempt to complete the requirement, and reason the requirement could not be completed below:

Activities Planned for Next Reporting Period

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

Yes, I agree

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

Annual Requirements

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

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

The City's stormwater ordinance adopted in 2010 is in compliance with the MS4 General Permit requirements except for the changes relative to 90% TSS and 60% P removal for new development and 50% P removal for redevelopment. The current ordinance requires 80% TSS removal for all permitted developments and has no standard for P removal. Since this requirement is proposed to be modified as part of the potential settlement of various appeals of the MS4 regulations, the City has held off updating its ordinance until this matter has been settled. If this occurs during year 3 of the permit, the City will move forward with this update.

Part V: Certification of Small MS4 Annual Report 2020

40 CFR 144.32(d) Certification

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

Name:

Alex B. Morse

Title:

Mayor

Signature:



Date:

9/28/2020

[Signatory may be a duly authorized representative]