

# Stormwater Management Program (SWMP)

## Town of Medway



## EPA NPDES Permit Number # MAR0411132

June 28, 2019 Revised June 24, 2020 Revised June 8, 2021

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#### Introduction

The Town of Medway (Town and Permittee ) has developed a Stormwater Management Plan (SWMP) as the guiding document to describe the activities and measures the Town will take in order to minimize the impacts of stormwater runoff into local waters. This document is a requirement under the United States Environmental Protection Agency's (EPA) 2016 National Pollutant Discharge Elimination System (NPDES) General Permit for stormwater discharges from Small Municipal Separate Storm Sewer Systems (MS4) in Massachusetts.

The six main elements of the stormwater management program are:

Public Education and Outreach - in order to affect public behavior causing stormwater pollution

**Public Involvement and Participation** - an opportunity for the public to participate and provide comments on the stormwater program

**Illicit Discharge Detection and Elimination (IDDE) Program** - a program to effectively find and eliminate illicit discharges within the MS4

**Construction Site Stormwater Runoff Control** - a program to effectively control construction site stormwater discharges to the MS4

**Post Construction Stormwater Management** - a program to ensure that stormwater from development projects entering the MS4 is adequately controlled by the construction of stormwater controls

Good Housekeeping and Pollution Prevention for Permittee Owned Operations program to ensure that stormwater pollution sources on municipal properties and from municipal operations are minimized.

In addition to these six measures the Town of Medway is also responsible for discharges to certain impaired waters. Details on these requirements are discussed in Section 1.3 of this document.

#### **1.1** History of the Stormwater Regulations and Requirements

The Stormwater Phase II Final Rule was promulgated in 1999 and was the next step after the 1987 Phase I Rule in EPA's effort to preserve, protect, and improve the Nation's water resources from polluted stormwater runoff. The Phase II program expanded the Phase I program by requiring additional operators of MS4s in urbanized areas and operators of small construction sites, through the use of NPDES Permits, to implement programs and practices to control polluted stormwater runoff. Phase II is intended to further reduce adverse impacts to water quality and aquatic habitat by instituting the use of controls on the unregulated sources of stormwater discharges that have the greatest likelihood of causing continued environmental degradation. Under the Phase II rule all MS4s with stormwater discharges from Census designated Urbanized Area are required to seek NPDES Permit coverage for those stormwater discharges (see Figure 1).

On May 1, 2003, EPA Region 1 issued its Final General Permit for Stormwater Discharges from Small Municipal Separate Storm Sewer Systems (2003 small MS4 Permit) consistent with the Phase II rule. The 2003 small MS4 Permit covered "traditional" (i.e., cities and towns) and "non-traditional" (i.e., Federal and state agencies) MS4 Operators located in the states of Massachusetts and New Hampshire. This Permit expired on May 1, 2008 but remained in effect until operators were authorized under the 2016 MS4 general Permit, which became effective on July 1, 2018.

On January 6, 2021 a revised version of the MS4 Permit was issued.

#### **1.2** Eligibility Requirements

In order for the Town to discharge stormwater to the Waters of the United States, it completed a Notice of Intent (NOI) and receive authorization from the EPA via the NPDES MS4 General Permit. Details on the eligibility provisions can be found in Section 1.2 and Section 1.9 of the General Permit.

The Town of Medway is an existing MS4 covered under the 2003 MS4 Permit and continues to meet the provisions of a small MS4 within the Commonwealth of Massachusetts. The majority of the Town is located within an urbanized area which also qualifies the Town for an MS4 Permit (see Figure 1).

#### 1.2.1 Special Eligibility Requirements

The Town of Medway must also provide documentation supporting the Town's eligibility determination with regard to the federal Endangered and Threatened Species and Critical Habitat Protection and Historic Properties Preservation.

The results from the U.S Fish and Wildlife Services endangered species screening system determined that Medway's MS4 area contains the Northern Long-eared Bat. Using the Endangered Species Act Eligibility Criteria, the Town is eligible for the MS4 Permit under Criterion C.

The Town also went through consultation with the State Historic Preservation Officer. Rabbit Hill Historic District and Medway Village Historic District are the two federally listed Historic Properties in Medway, and therefore, the Town is eligible under Criterion A for these areas.

Supporting documentation was included in the Town's NOI and is provided in Appendix A.

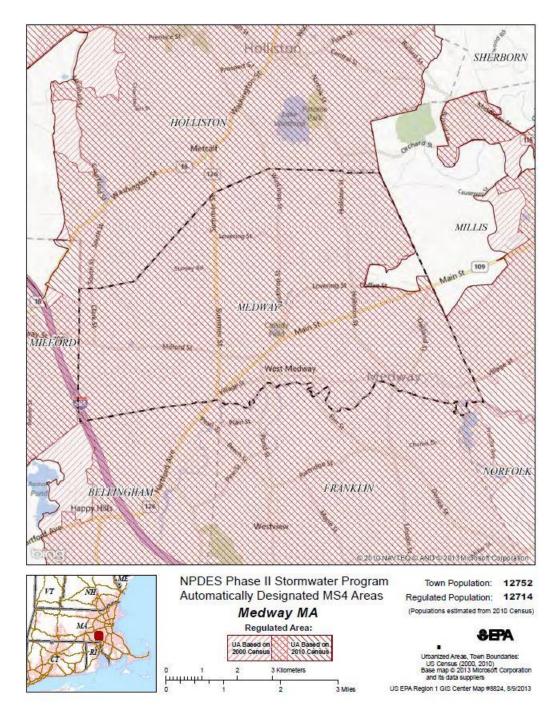


Figure 1 Automatically Designated MS4 Area in the Town of Medway.

### 1.3 Impaired Waters in Medway

According to the Massachusetts Year 2016 Integrated List of Waters (updated December 2019) the following impaired waters are found within the boundaries of the Town of Medway.

Water Body	Segment ID	2016 Impairment Category	2016 Impairment	EPA TMDL #
Charles River	MA 72-04	5	Flow Regime Modification*	
			Chlordane in Fish Tissue	
			DDT in Fish Tissue	
			E. Coli	32366
			Fish Bioassessments	
			Mercury in Fish Tissue	
Charles River	MA 72-05	5	Non-native aquatic plants*	
			Algae	40317
			Benthic Macroinvertebrates	
			Chlordane in Fish Tissue	
			DDT in Fish Tissue	
			Dissolved Oxygen	40317
			Dissolved Oxygen Supersaturation	40317
			Mercury in Fish Tissue	
			Nutrient/Eutrophication Biological indicators	40317
			Phosphorus, Total	40317
			Turbidity	40317
Chicken Brook	MA 72-34	5	E. coli	
Hopping Brook	MA 72-35	5	E. coli	

Table 1: Impaired Waters in	n Town of Medway
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On June 10, 2011, the EPA approved the Total Maximum Daily Load for Nutrients in the Upper/Middle Charles River. Therefore, the Town must comply with Appendix F(A)(I) – Charles

River Watershed Phosphorus TMDL Requirements. As a part of these requirements the Town will implement a Phosphorus Control Plan (PCP) within the entire municipal boundary. On January 6, 2021, the TMDL target reductions were increased after the EPA determined the phosphorus removal credits from the Illicit Discharge Detection and Elimination Program should not be included because the program began during the current Permit term. The updated target reductions are shown in **Table 2** below.

The Charles River segments 72-04 and 72-05 are also listed as having a pathogen impairment. Therefore, the Town must meet the requirements listed in section 2.3 of the Permit as well as the enhanced BMPs listed in Appendix F (A) (III).

Baseline Phosphorus Load (kg/year)	Stormwater Phosphorus Load Reduction Requirement (kg/year)	Allowable Phosphorus Load (kg/year)	Stormwater Percent Reduction in Phosphorus Load (%)
1,063	400	662	38%

Chicken Brook and Hopping Brook were recategorized from Category 2 waters to Category 5 waters on the 2016 List, and therefore, must comply with Appendix F A (III) for Bacteria and Pathogen TMDL requirements.

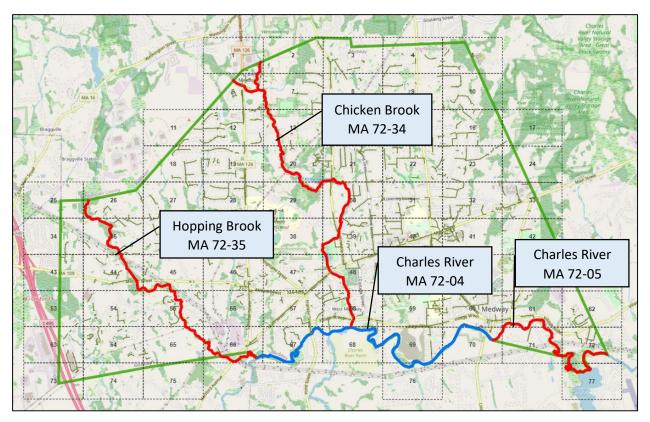


Figure 2: Impaired waters in Medway by their segment identification.

#### 1.4 Small MS4 Authorization

The Town submitted its NOI on September 28, 2019, which can be found in Appendix A.

The Town received Authorization to Discharge on April 22, 2019. The Authorization Letter can be found in Appendix B.

#### 1.5 Permit Year Definitions

In accordance with the MS4 Permit, there are several deliverables that must be met during certain Permit years. The Permit Years (PY) are as follows:

PY1: July 1, 2018 to June 30, 2019 PY2: July 1, 2019 to June 30, 2020 PY3: July 1, 2020 to June 30, 2021 PY4: July 1, 2021 to June 30, 2022 PY5: July 1, 2022 to June 30, 2023 The following sections list the minimum control measures the Town will undertake during the Permit term as identified in the Notice of Intent. The tables list each measure, the responsible party for implementation, the intended audience, the method in which the Town will track the success of the measure, the beginning year of implementation, and the status of each measure is included in the tables.

## MCM 1 Public Education and Outreach

#### Permit Part 2.3.2

**Objective**: The Permittee shall implement an education program that includes educational goals based on stormwater issues of significance within the MS4 area. The ultimate objective of a public education program is to increase knowledge and change behavior of the public so that the pollutants in stormwater are reduced.

#### **Update**

During Year 3, the Town made some adjustments to the methods used for public education. The Town has an active social media presence and participation rate from the public; therefore, there was a stronger focus on this method than in years past. Furthermore, public events were canceled again this year due to the pandemic, so the DPW and Conservation Commission were not able to use this opportunity for outreach. The Medway Matters Monthly Newsletter has been discontinued at this time. Finally, as the program has evolved it seems that the messages and methods listed in the NOI do not align as well as anticipated. For example, the electronic message board is better suited for leaf litter education rather than pet waste management education.

Date	Message Topic	Likes	Comments	Shares	People Reached	Engagements
10/5/2020	Leaf litter	5	1	2	1,347	74
4/9/2021	General stormwater information and Think Blue MA campaign	5	1	2	1,078	23
4/15/2021	Lawn maintenance, fertilizer use, Phosphorus reduction	18	2	3	1,910	100
6/10/2021	Business Owner	3	0	0	1,154	19
6/14/2021	Proper pet waste management	46	2	9	9,487	904

Below is a table listing the seven educational messages the Town distributed throughout Year 3.

6/21/2021	Proper pet waste management	21	0	5	3,178	153
6/28/2021	Proper pet waste management	4	0	1	1,078	10

BMP ID	BMP Media/Category	BMP Description	Targeted Audience	Responsible Personnel	Measurable Goal	Beginning Year of Implementation	Status
1-1	Special Events/Festivals/Fairs	Engage residents during annual Medway Pride Day. Explain MS4 Permit and why it matters and how it relates to everyday life. Focus on pet waste, lawn care and fertilizer BMPs, septic system management, snow and ice removal, rain barrels, and GI.	Residents	Conservation Agent	Staff a booth/table minimum once every 2 years.	Year 2	<ul><li>Year 1: Hosted event May 18, 2019.</li><li>Year 2: Event canceled in 2020 due to pandemic.</li><li>Year 3:Event canceled in 2021 due to pandemic.</li></ul>
1-2	Brochures/Pamphlets	Grass clippings and fertilizer management: update existing Medway brochure. Include landscape management, fertilizer use, and snow and ice removal.	Businesses/Institutions and Commercial Facilities	DPW	Continual distribution of brochure at the following locations: Town Hall, Planning Office, ConCom Office, DPW Office; Mailing to top 20% (by parcel size) commercial property owners in Medway.	Year 1	Year 1: Distribute brochures in the DPW office. Did not mail to commercial property owners. Year 2: No update. Year 3: No update.
1-3	Brochures/Pamphlets	Sedimentation and erosion control messaging.	Developers (construction)	Planning and Economic Development Coordinator	Distribution of pamphlet at Planning offices to developers seeking Permits through site development process.	Year 2	Year 1: N/A Year 2: Incomplete Year 3: Incomplete
1-4	Brochures/Pamphlets	Management of SW from metal roofs (Zone II related); proper maintenance of parking lot surfaces	Industrial Facilities	DPW	Mail to 100% of industrially zoned parcels.	Year 2	Year 1: N/A Year 2: Incomplete Year 3: Incomplete
1-5	Electronic Messaging Board	Rotating (seasonal) messages on grass clippings and fertilizer management, pet waste management, snow and ice treatments, and septic system management.	Residents	DPW	Message Boards placed at publicly accessible locations.	Year 3	Year 1: N/A Year 2: N/A Year 3: Incomplete
1-6	Medway Matters monthly digital newsletter	Preventing SSOs through FOG program; highlighting impacts of FOG article	Businesses/Institutions and Commercial Facilities	Communications Director	Achieve "open" rate of greater than 50% for edition newsletter.	Year 4	Year 1: N/A Year 2: No longer distribute the newsletter. Year 3: No Update
1-7	Local Public Service Announcements	Posting of PSA on FB page re: good site maintenance and LID techniques for residential development	Developers (construction)	Communications Director	100% response to questions or comments posted on the page in relation to PSA.	Year 5	Year 1: N/A Year 2: N/A Year 3: N/A
1-8	Newspaper Articles/Press Release	Waste management best practices such as covering dumpsters, sweeping regularly, keeping inventory and waste within buildings or protected from SW.	Industrial Facilities	DPW	Mail to 100% of industrially zoned parcels.	Year 5	Year 1: N/A Year 2: N/A Year 3: N/A

## MCM 2: Public Involvement and Participation

Permit Part 2.3.3

**Objective**: The Permittee shall provide opportunities to engage the public to participate in the review and implementation of the Permittee 's SWMP.

BMP ID	BMP Media/Category	BMP Description	Responsible Personnel	Measurable Goal	Beginning Year of Implementation	Status
2-1	Public Review	SWMP Review; to be available through website redirect to stormwater page.	DPW	Allow annual review of stormwater management plan and posting of stormwater management plan on website.	Year 1	Year 1: Complete Year 2: Complete Year 3: Complete
2-2	Public Participation	Public comment on SWMP.	DPW	Allow public to comment on stormwater management plan annually.	Year 1	Year 1: Complete Year 2: Complete Year 3: Complete
2-3	Public Participation	Direct messages to support participation in Town's Household Hazardous Waste Day.	DPW	Track volume of material collected and number of residents participating.	Year 2	Year 1: Complete Year 2: Complete Year 3: Hosted 2 events.
2-4	Public Participation	Direct messages to support participation in Town's "Clean Sweep" Day.	DPW	Track volume of material collected and number of residents participating.	Year 2	Year 1: Complete Year 2: Cancelled by pandemic. Year 3: Cancelled by pandemic.

## **MCM 3** Illicit Discharge Detection and Elimination (IDDE) Program

Permit Part 2.3.4

**Objective**: The Permittee shall implement an IDDE program to systematically find and eliminate illicit sources of non-stormwater discharges to its municipal separate storm sewer system and implement procedures to prevent such discharges.

BMP ID	BMP Media/Category	BMP Description	Responsible Personnel	Measurable Goal	Beginning Year of Implementation	Status
3-1	SSO Inventory	Maintain SSO Inventory in accordance with Permit conditions.	DPW	Town has completed the requirements of this BMP via the IWRMP. Maintain inventory as new information becomes available.	Year 1	Year 1: Complete Year 2: Complete Year 3: Complete
3-2	Storm sewer system map	Update map as appropriate during IDDE program implementation.	GIS Coordinator	Map 100% of outfalls and receiving waters, open channel conveyances, interconnections, municipally-owned stormwater treatment structures, waterbodies identified by name and indication of all use impairments, and initial catchment delineations within 2 years of the Permit's effective date.	Year 2	Year 1: Partial Year 2: Partial Year 3: Complete
3-3	Written IDDE Plan	Create written IDDE program	DPW	Existing written IDDE program to be updated within 1 year of effective date of Permit and update as required.	Year 1	Year 1: Partial Year 2: Partial Year 3: Complete
3-4	Implement revised IDDE Program	Implement catchment investigations according to program and Permit conditions.	DPW	Complete within 10 years of Permit effective date.	Year 1	Year 1: N/A Year 2: N/A Year 3: Began implementation
3-5	Employee Training	Train employees on IDDE implementation	DPW	Train annually	Year 1	Year 1: Incomplete Year 2: Complete Year 3: Complete
3-6	Conduct dry weather screening	Conduct in accordance with outfall screening procedures and Permit conditions.	DPW	Complete within 3 years of effective date of Permit.	Year 2	Year 1: N/A Year 2: Partial Year 3: Complete
3-7	Conduct wet weather screening	Conduct in accordance with outfall screening procedures and Permit conditions.	DPW	Complete 10 years after effective date of Permit.	Year 3	Year 1: N/A Year 2: N/A Year 3: Began implementation
3-8	Ongoing screening	Conduct dry and wet weather screening as needed.	DPW	Complete ongoing outfall screening upon completion of IDDE program.	Year 5	Year 1: N/A Year 2: Partial Year 3: Partial

## MCM 4 Construction Site Stormwater Runoff Control

Permit Part 2.3.5

**Objective**: The objective of an effective construction stormwater runoff control program is to minimize or eliminate erosion and maintain sediment on site so that it is not transported in stormwater and allowed to discharge to a water of the U.S. through the Permittee 's MS4.

**BMP** 4-1: October 7, 2020 Meeting between DPW, Community and Economic Development Department, and Conservation to establish procedures site inspection, enforcement and tracking. Planning and Economic Development Coordinator and Conservation Agent will maintain their records for number of Land Disturbance Permit Reviews completed in a year. They will also track the number of inspections and enforcements. For Conservation Commission, Conservation Agent will complete the inspections and enforcement orders. For Community and Economic Development Department, an outside consultant will complete the inspections and enforcements and enforcements and enforcements. At the beginning of each fiscal year, the Compliance Coordinator will reach out to these departments for the tally of completed reviews, inspections, and enforcements completed in the prior fiscal year and report them in the MS4 Annual Report.

BMP ID	BMP Media/Category	BMP Description	Responsible Personnel	Measurable Goal	Beginning Year of Implementation	Status
4-1	Site inspection and enforcement of erosion and sediment control measures	Complete written procedures of site inspections and enforcement procedures	DPW, Conservation Agent, Community and Economic Development Department, Building Department	Maintain current procedures and document 100% of inspections.	Year 1	Complete 2018 Updated 2020
4-2	Site Plan Review	Complete written procedures of site plan review and begin implementation	Planning and Economic Development Coordinator	Complete update to existing review procedures within 1 year of the effective date of Permit.	Year 1	Complete 2018
4-3	Erosion and Sediment Control	Adoption of requirements for construction operators to implement a sediment and erosion control program	Planning and Economic Development Coordinator	Maintain current procedures and document 100% project close-outs of construction phase controls.	Year 1	Complete 2018
4-4	Waste Control	Adoption of requirements to control wastes including but not limited to discarded building materials, concrete truck wash out, chemicals, litter, and sanitary wastes.	Planning and Economic Development Coordinator	Maintain current procedures	Year 1	Complete 2018

### MCM 5 Post Construction Stormwater Management in New Development and Redevelopment

Permit Part 2.3.6

**Objective**: The objective of an effective post construction stormwater management program is to reduce the discharge of pollutants found in stormwater to the MS4 through the retention or treatment of stormwater after construction on new or redeveloped sites and to ensure proper maintenance of installed stormwater controls.

BMP 5-1: October 7, 2020 Meeting between DPW, Community and Economic Development Department, and Conservation to establish procedures for the submission of As-Builts. Once a Land Disturbance Permit has been issued and the project has been issued either a Certificate of Compliance or Certificate of Completion, the following documents will be uploaded to the Town's One Drive: As-built plan, Long Term Operation and Maintenance, specifications for BMPs, drainage report, and certification that these documents are recorded in the Registry of Deeds. Each property will have a folder where the Compliance Coordinator will collect and store annual reports documenting compliance with the Long Term O&M plans.

BMP ID	BMP Media/Category	BMP Description	Responsible Personnel	Measurable Goal	Beginning Year of Implementation	Status
5-1	As-Built plans for on-site stormwater control	The procedures to require submission of as-built drawings and ensure long term operation and maintenance will be a part of the SWMP	Planning and Economic Development Coordinator	Require submission of as-built plans for 100% of completed projects.	Year 1	Complete
5-2	Target properties to reduce impervious areas	Identify at least 5 Permittee -owned properties that could be modified or retrofitted with BMPs to reduce impervious areas and update annually	DPW	Analysis complete and properties identified; report annually on status of retrofit-candidate properties.	Year 4	Complete
5-3	Allow Green Infrastructure	Develop a report assessing existing local regulations to determine the feasibility of making green infrastructure practices allowable when appropriate site conditions exist	Planning and Economic Development Coordinator	Complete 4 years after effective date of Permit and implement recommendations of report.	Year 3	
5-4	Street design and parking lot guidelines	Develop a report assessing requirements that affect the creation of impervious cover. The assessment will help determine if changes to design standards for streets and parking lots can be modified to support low impact design options.	Planning and Economic Development Coordinator	Complete 4 years after effective date of Permit and implement recommendations of report.	Year 3	
5-5	Ensure any stormwater controls or management practices for new development and redevelopment meet the retention or treatment requirements of the Permit and all applicable requirements of the Massachusetts Stormwater Handbook and MS4 Permit (e.g. 1" retention from impervious area for new development).	Adoption, amendment, or modification to current regulation to meet Permit requirements	Planning and Economic Development Coordinator	Complete update to existing mechanism (if necessary) 2 years after effective date of Permit.	Year 1	Complete

## MCM 6 Good Housekeeping and Pollution Prevention for Permittee Owned Operations

Permit Part 2.3.7

**Objective**: The Permittee shall implement an operations and maintenance program for Permittee -owned operations that has a goal of preventing or reducing pollutant runoff and protecting water quality from all Permittee -owned operations.

BMP 6-1: BMP 6-2: BMP 6-3: BMP 6-3: BMP 6-5: BMP 6-7: BMP 6-8:

BMP ID	BMP Media/Category	BMP Description	Responsible Personnel	Measurable Goal	Beginning Year of Implementation	Status
6-1	O&M Procedures	Create written O&M procedures including all requirements contained in 2.3.7.a.ii for parks and open spaces, buildings and facilities, and vehicles and equipment.	DPW	Update the O&M plan as needed for new equipment and protocols (e.g. revised street sweeping or CB cleaning).	Year 1	
6-2	Inventory all Permittee - owned parks and open spaces, buildings and facilities, and vehicles and equipment.	Create inventory	DPW	Update the inventory annually as needed.	Year 1	
6-3	Infrastructure O&M	Establish and implement a program for repair and rehabilitation of MS4 infrastructure.	DPW	Update plan within 2 years of effective date of Permit.	Year 2	
6-4	Stormwater Pollution Prevention Plan (SWPPP)	Create SWPPP for maintenance garages, transfer stations, and other waste- handling facilities.	DPW	Complete and implement within 2 years effective date of Permit.	Year 2	Complete 2021
6-5	Catch basin cleaning	Establish a schedule for catch basin cleaning so that each catch basin is never more than 50% full.	DPW	Clean catch basins on established schedule and report the number of catch basins cleaned and volume of material removed annually.	Year 1	Complete
6-6	Street sweeping program	Sweep all streets and Permittee -owned parking lots in accordance with Permit conditions	DPW	Sweep all streets and Permittee -owned parking lots annually	Year 1	Complete
6-7	Road salt use optimization program	Establish and implement a program to minimize the use of road salt	DPW	Implement salt use optimization during deicing season	Year 1	
6-8	Inspection and maintenance of stormwater infrastructure	Establish and implement inspection and maintenance procedures and frequencies	DPW	Inspect and maintain treatment structures in conformance with manufacturer's guidance	Year 1	

## Charles River Watershed Phosphorus TMDL Requirements

Appendix F Part A Section I

BMP ID	BMP Category	BMP Description	Responsible Personnel	Measurable Goal		Status
7-1	Public Education and Outreach	Distribute an annual message in the spring(April/May) that encourages the proper use and disposal of grass clippings and encourages the proper use of slow-release and phosphorus free fertilizers.	DPW	Educational posts on Town's social media account. Display message on electronic signs.	Annual Requirement	Complete
7-2	Public Education and Outreach	Distribute an annual message in the summer (June/July) encouraging the proper management of pet waste, including waste, including noting any existing ordinances where appropriate	DPW	Educational posts on Town's social media account.	Annual Requirement	Complete
7-3	Public Education and Outreach	Distribute an annual message in the fall (August/September/October) encouraging the proper disposal of leaf litter.	DPW	Educational posts on Town's social media account. Display message on electronic signs.	Annual Requirement	Complete
7-4	Good Housekeeping and Pollution Prevention for Permittee- owned operations	Increase 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)	DPW	Track miles swept and volume of material collected	Annual Requirement	Complete
7-5	Good Housekeeping and Pollution Prevention for Permittee- owned operations	Establish procedures to properly manage grass cuttings and leaf litter on permittee property, including prohibiting blowing organic waste materials onto adjacent impervious surfaces	DPW	Staff training and reminders as needed	Annual Requirement	Complete

7-6	Stormwater Management in	Retrofit inventory and priority ranking under	DPW	Create an inventory of	Annual Requirement	Partial complete
	New and Redevelopment	2.3.6.1.b. shall include consideration of BMPs to reduce phosphorus discharges		private BMPs and identify what can be retrofitted. Update Bylaw to		2021
				include this authority.		
7-7	Phosphorus Reduction Tracking BMP	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 shall be tracked and the permittee shall estimate the phosphorus removal by the BMP consistent with Attachment 1 to Appendix H.	DPW	The BMP type, total area treated by the BMP, the design storage volume of the BMP and the estimated phosphorus removed in pass per year by the BMP is found in the following document or website and is updated yearly at a minimum:	Annual Requirement	Complete 2021
7-8	Stormwater Management in New and Redevelopment	The requirement for adoption/amendment of the permittee's ordinance or other regulatory mechanism shall include a requirement that new development and redevelopment stormwater management BMPs be optimized for phosphorus removal.	DPW		Due year 2	Complete

7-9	Stormwater Management in New and Redevelopment	Complete a Phosphorus Source Identification Report	DPW	Due year 4
7-10	Stormwater Management in New and Redevelopment	Retrofit inventory and priority ranking under 2.3.6.1.b. shall include consideration of BMPs that infiltrate stormwater where feasible	DPW	Due year 4
7-11	Potential Structural BMPs	Evaluate all permittee-owned properties identified as presenting retrofit opportunities or areas for structural BMP installation under Permit part 2.3.6.d.ii or identified in the Phosphorus Source Identification Report that are within the drainage area of the impaired water or its tributaries	DPW	Due year 5
7-12	Potential Structural BMPs	Complete a listing of planned structural BMPs and a plan and schedule for implementation	DPW	Due Year 5

## Bacteria and Pathogen TMDL Requirements

#### Appendix F Part A Section III

BMP ID	BMP Category	BMP Description	Responsible Personnel	Measurable Goal		Status
8-1	Mapping	Rank outfalls to these receiving waters as high priority for IDDE implementation in the initial outfall ranking	DPW	Create list of outfalls and related BMPs that drain directly to receiving waters	Annual requirement	
8-2	Public Education and Outreach	Annual message encouraging the proper management of pet waste, including noting any existing ordinances where appropriate	DPW	Educational posts on Town's social media account	Annual requirement	
8-3	Public Education and Outreach	Permittee or its agents disseminate educational material to dog owners at the time of issuance or renewal of dog licenses, or other appropriate time	DPW	Automatic messaging using online license renewal portal. Educational signage at Dog Park. Coordinate with local dog-related businesses to share information.	Annual requirement	
8-4	Public Education and Outreach	Provide information to owners of septic systems about proper maintenance in any catchment that discharges to a water body impaired for bacteria.	DPW	Direct mailing to residents with septic systems, or newspaper advertisement in coordination with approved septic haulers. Brochure at BOH and DPW for distribution and at change of owner. Educational post on Town's social media account.	Annual requirement	

#### **Stormwater Management Program – 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 gathered and evaluated 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."

Authorized Official

Title

Date