

Town of Hull, MA

Stormwater Management Program (SWMP): Volume 1

*NPDES Phase II Small MS4 General Permit
June 2021*

STORMWATER MANAGEMENT PLAN



BETA

315 Norwood Park South
2nd Floor
Norwood, Massachusetts 02062
781.255.1982
www.BETA-Inc.com

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STORMWATER MANAGEMENT PLAN

Prepared by: BETA GROUP, INC.

Prepared for: Town of Hull

June 2021

Refer to **Appendix C** for Delegation of Authority Letter.

Contact Person: **Chris Gardner** Title: **Director, Public Works**

Telephone #: **781-925-0900** Email: **cgardner@town.hull.ma.us**

Mailing Address: **Hull Public Works Office**
9 Nantasket Avenue
Hull, MA 02045

Certification:

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

Signature: Chris Gardner Date: 9.21.21

Printed Name: CHRIS Gardner Title: DPW Director

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SUMMARY OF REVISIONS

Revision #	Change	Date / Permit Year
0	SWMP Volumes 1 & 2 Issued (SWMP & IDDE)	June 2019 / Year 1
1	SWMP Volume 3 Issued (O&M)	June 2020 / Year 2
2	SWMP Volumes 1, 2, & 3 Updated Reflects completed BMPs, Self-Audit / Status, Personnel Changes, 2016 List of Impaired Waters, IDDE & O&M Progress	June 2021 / Year 3

1.0 EXECUTIVE SUMMARY

Each community with a municipal separate storm sewer system (MS4) in designated urbanized areas must develop a Stormwater Management Program (SWMP) that will guide its activities under the 2016 MS4 general permit. This SWMP was developed by the Town of Hull to protect water quality and reduce the discharge of pollutants from the municipality's storm sewer system to the maximum extent practicable (MEP) as described herein.

The SWMP is comprised of four volumes. This report is Volume 1 of 4.

- **SWMP Volume 1 – Stormwater Management Plan**
- SWMP Volume 2 – Illicit Discharge Detection and Elimination (IDDE) Plan
- SWMP Volume 3 – Good Housekeeping and Pollution Prevention (O&M) Plan
- SWMP Volume 4 – Annual Reporting

Written plans for SWMP Volumes 1 and 2 are required to be completed by the end of Year 1 of the permit term (June 30, 2019). Written plan for Volume 3 is required to be completed by the end of Year 2 of the permit term (June 30, 2020). Volume 4 compiles the documentation required over each reporting period (July 1 to June 30) for assembly of annual reports due September 30th each year.

All documents are available for review and comment on the Town of Hull Stormwater Website as follows:

Stormwater Information Page is located here:

<https://www.town.hull.ma.us/departments-public-works/webforms/storm-water-management-information>

Stormwater Bylaw and Regulations are located here:

<https://ecode360.com/34084945>

2.0 INTRODUCTION & BACKGROUND

2.1 STORMWATER REGULATION

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 expands 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 Areas are required to seek NPDES permit coverage for those stormwater discharges.

2.2 PERMIT PROGRAM BACKGROUND

On May 1, 2003, EPA Region I issued its Final General Permit for Stormwater Discharges from Small Municipal Separate Storm Sewer Systems (MS4-2003 permit) consistent with the Phase II rule. The MS4-2003 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, hereinafter referred to as the Permit, which became effective on July 1, 2018.

2.3 TOWN SPECIFIC MS4 BACKGROUND

Approximately 85% of the Town of Hull, and 100% of the mainland of Hull is designated as urbanized area by the 2010 census. This area regulated under the MS4 permit is highlighted on the MS4 Environmental Overview Map in **Appendix A**. Peddocks Island and Bumpkin Island, located off the west coast of Hull, are not identified as urbanized and therefore are not subject to the requirements of the permit. Additionally, there is no stormwater infrastructure on either island; for these reasons the waterbody Hingham Bay (MA70-06) is not included in the list of waterbodies impacted by the Town.

Within the designated MS4 area, Hull has five water body segments that receive flow from the MS4, with four of those designated as Category 5 Waters in the Massachusetts 2016 Integrated List of Waters. The fifth waterbody is the Massachusetts Bay which has yet to be categorized. These Integrated Waters Listings include impairments for Fecal Coliform in Boston Harbor, Hull Bay, Weir River, and Hingham Bay. Most of the Town also falls within the Weir River Watershed which has no additional impairments or required actions. Actions for each waterbody and impairment are described in detail in **Section 5.0** of this report.

The Town of Hull's MS4 is composed of pipes, catch basins, manholes, culverts, swales and outfalls discharging to bays, ponds and rivers. A GIS database has been established which contains Town-wide information for all drainage structures including:

- 1628 Town-owned catch basins
 - 103 owned by private/other
 - 88 State-owned
- 124 outfalls (124 outfalls subject to MS4 Permit)
- 349 Town-owned storm drain manholes
 - 40 owned by private/other
 - 9 State-owned

A map with these elements is included in **Appendix A**. The map includes stormwater system structures and identifies the impaired water bodies and the MS4 areas tributary to each.

Massachusetts Department of Transportation (MassDOT) has one roadway within Hull's MS4 regulated area, Route 228 (Nantasket Avenue). MassDOT is required to have their own NPDES MS4 Permit for their properties, which are therefore not the responsibility of the Town. Additionally, there are two areas owned and operated by the DCR for which the Town is also not responsible: Nantasket Beach and Fort Revere Park.

2.4 STORMWATER MANAGEMENT PROGRAM (SWMP)

The Town was previously authorized by the MS4-2003 permit which had established six minimum control measures, Best Management Practice (BMPs) and measurable goals to meet the terms and conditions of that permit. This SWMP is a modification and update to the previous plan and efforts.

The SWMP describes and details the activities and measures that will be implemented to meet the terms and conditions of the Permit. The SWMP accurately describes the Town's plans and activities. The document will be updated and/or modified during the Permit term as the permittee's activities are modified, changed or updated to meet Permit conditions during the Permit term. The main elements of the stormwater management program are (1) a public education program in order to change public behavior causing stormwater pollution, (2) an opportunity for the public to participate in and provide comments on the stormwater program, (3) a program to effectively find and eliminate illicit discharges within the MS4, (4) a program to effectively control construction site stormwater discharges to the MS4, (5) a program to ensure that stormwater from development projects entering the MS4 is adequately controlled by the construction of stormwater controls, and (6) a good housekeeping program to ensure that stormwater pollution sources on municipal properties and from municipal operations are minimized.

This document will be made available on the Town website, and at the Department of Public Works (DPW) Office. The Permit covers the following which are included in this SWMP Plan:

- Identification of Responsible Parties
- Endangered and Threatened Species and Historic Properties Protection
- Increased Discharges and Discharges to Waters with TMDLs or Subject to Additional Requirements
- Implementation of Six Minimum Control Measures
- Sanitary Sewer Overflow Inventory
- Surface Drinking Water Supply Protection
- Annual Program Evaluation

2.5 IMPLEMENTATION SCHEDULE AND STATUS

MS4 General Permit implementation timeline and current status is shown in **Figure 2-1**.

Figure 2-1: Town of Hull MS4 Permit Compliance Schedule

CM	Task	Date Required	Complete During/By Year (Yr 1 is July 2018- June 2019)												
			1	2	3	4	5	6	7	8	9	10			
	Notice of Intent (NOI)	9/30/2018	█												
	Stormwater Management Plan - SWMP (update/develop)	6/30/2019	█												
	SWMP update	Annually	█	█	█	█	█	█	█	█	█	█	█	█	█
MINIMUM CONTROL MEASURES															
1	Public Education and Outreach Messages*														
	Residents - 2 messages	By yr 5, min. 1 year apart	█												
	Businesses & Institutions - 2 messages	By yr 5, min. 1 year apart	█	█	█	█	█	█	█	█	█	█	█	█	█
	Developers - 2 messages	By yr 5, min. 1 year apart	█	█	█	█	█	█	█	█	█	█	█	█	█
	Industrial Facilities - 2 messages	By yr 5, min. 1 year apart	█	█	█	█	█	█	█	█	█	█	█	█	█
2	Public Involvement and Participation														
	Public Review of SWMP & Annual Report	Annually	█	█	█	█	█	█	█	█	█	█	█	█	█
	Opportunities for Public Participation	Annually	█	█	█	█	█	█	█	█	█	█	█	█	█
3	Illicit Discharge Detection & Elimination (IDDE)*														
	Sanitary Sewer Overflows Inventory	6/30/2019	█												
	System Mapping - Phase 1, inc. catchment delineations	6/30/2021	█	█	█	█	█	█	█	█	█	█	█	█	█
	System Mapping - Phase 2	Update Annually	█	█	█	█	█	█	█	█	█	█	█	█	█
	Written IDDE Program	6/30/2019	█												
	Outfall/Interconnects Inventory & Initial Catchment Ranking*	6/30/2019	█												
	Outfall/Interconnects Catchment Ranking Updates	Update Annually	█	█	█	█	█	█	█	█	█	█	█	█	█
	Dry Weather Screening & Sampling	By yr 3 & every 5 yrs	█	█	█	█	█	█	█	█	█	█	█	█	█
	Catchment Investigations Procedures	12/30/2019	█												
	Catchment Investigations Problem Outfalls	6/30/2025	█	█	█	█	█	█	█	█	█	█	█	█	█
	Catchment Investigations All Outfalls	6/30/2028	█	█	█	█	█	█	█	█	█	█	█	█	█
	Wet Weather Sampling	part of catchment invest.	█	█	█	█	█	█	█	█	█	█	█	█	█
	Illicit Discharge Elimination (Locate & Remove)	60 Days from source ID	█	█	█	█	█	█	█	█	█	█	█	█	█
	Confirmatory Dry Weather Screening	1 yr after removal	█	█	█	█	█	█	█	█	█	█	█	█	█
	Training	Annually	█	█	█	█	█	█	█	█	█	█	█	█	█
4	Construction Site Runoff Control														
	Construction Site Inspections & Enforcement Procedures	6/30/2019	█												
	Site Plan Review Procedures	6/30/2019	█												
	Requirement for Construction Site Erosion Controls	6/30/2019	█												
	Construction Site Waste Control Requirements	6/30/2019	█												
5	New Development and Redevelopment*														
	Update Regulations - Retention/Treatment	6/30/2022	█	█	█	█	█	█	█	█	█	█	█	█	█
	Assess Street Design & Parking Guidelines	6/30/2022	█	█	█	█	█	█	█	█	█	█	█	█	█
	Assess Regulations to allow Green Infrastructure	6/30/2022	█	█	█	█	█	█	█	█	█	█	█	█	█
	Locate 5 Properties for Impervious Area Reduction	6/30/2022	█	█	█	█	█	█	█	█	█	█	█	█	█
6	Good Housekeeping														
	Winter Road Maintenance Procedures	6/30/2019	█												
	O&M, SWPPP & Infrastructure Program	6/30/2021	█	█	█	█	█	█	█	█	█	█	█	█	█
	Training for O&M and SWPPP Program Activities	Regularly/As Needed	█	█	█	█	█	█	█	█	█	█	█	█	█
	Catch Basin Cleaning Schedule	6/30/2019	█												
	Catch Basin Cleaning	when 50% full	█	█	█	█	█	█	█	█	█	█	█	█	█
	Street Sweeping	Spring	█	█	█	█	█	█	█	█	█	█	█	█	█
	Inspections for SWPPP	Quarterly	█	█	█	█	█	█	█	█	█	█	█	█	█
	Inspection of Structural BMPs	Annually	█	█	█	█	█	█	█	█	█	█	█	█	█
	Maintenance of Structural BMPs	as needed	█	█	█	█	█	█	█	█	█	█	█	█	█
	Annual Reports	by 9/30 annually	█	█	█	█	█	█	█	█	█	█	█	█	█
	*Supplemental requirements for receiving waters impairments for bacteria.		█	█	█	█	█	█	█	█	█	█	█	█	█

3.0 SMALL MS4 AUTHORIZATION

The Notice of Intent (NOI) containing the information in Appendix E of the Permit was submitted to EPA on or prior to September 27, 2018.

EPA has completed its initial review of the NOI and issued an authorization to discharge letter to the Town of Hull (dated May 30, 2019) both of which are posted on the following website: <https://www.epa.gov/npdes-permits/regulated-ms4-massachusetts-communities>.

4.0 IDENTIFICATION OF RESPONSIBLE PARTIES FOR IMPLEMENTATION OF PROGRAM

The implementation and coordination of this program is the responsibility of Hull Public Works Department, specifically the Director of Public Works.

SWMP Team Coordinator

Name:	Chris Gardner	Title:	Director	Department:	Public Works
Phone:	781-925-0900	Email:	cgardner@town.hull.ma.us		
Responsibilities: MS4 Coordinator, IDDE Program, Good Housekeeping, Reporting & Record Keeping, Public Participation, IDDE - public Works and Sewer, O&M of facilities					

SWMP Team

Name:	Chris Krahforst	Title:	Agent	Department:	Conservation Commission
Phone:	781-925-8102	Email:	ckrahforst@town.hull.us		
Responsibilities: Stormwater Bylaw/Regulations, Post Construction SWM, Plan Review, Inspection					

Name:	Chris Dilorio	Title:	Planning Director	Department:	Community Development
Phone:	781-925-3595	Email:	cdilorio@town.hull.ma.us		
Responsibilities: Public Education and Outreach, Post Construction SWM, Plan Review, Inspection					

Name:	Bartley Kelly	Title:	Commissioner	Department:	Building Department
Phone:	781-925-1330	Email:	bjkelly@town.hull.us		
Responsibilities: Construction Site SW Control					

Name:	John Struzziery	Title:	Director of Wastewater Operations	Department:	Sewer
		Title:	Assistant Director	Department:	Public Works
Phone:	781-925-1207	Email:	jstruzziery@town.hull.us		
Responsibilities: Good housekeeping, SWPPP, O&M of facilities, IDDE - Public Works and Sewer					

5.0 RESOURCE PROTECTION

5.1 ENDANGERED AND THREATENED SPECIES

The Permit requires applicants to assess the impacts of their stormwater discharges and discharge related activities on federally listed endangered and threatened species and designated critical habitat.

The NOI submitted in September of 2018 for coverage under the Permit identified two threatened species of concern. Threatened species included the Northern Long-eared Bat, a mammal and the Piping Plover, a bird. According to guidance provided in Appendix C of the Permit and the IPaC report, the project meets eligibility for Endangered Species Act (ESA) under U.S. Fish and Wildlife Service (USFWS) Criteria B. Based on correspondence with USFWS the determination of “no effect” was found to be appropriate for Hull given that all discharges identified in the NOI are an existing condition currently subject to 2003 MS4 General Permit; there are no new structural BMP’s proposed at this time. A letter to this affect from USFWS was provided with the NOI to complete the ESA determination. As described in this SWMP, there is no reason to believe that the stormwater discharges, allowable non-stormwater discharges and discharge related activities will have any effect on the identified species or any other listed species or critical habitat. This is based on the following:

1. All stormwater discharges are pre-existing or previously permitted by EPA;
2. Any planned operations and maintenance work covered by this permit will only affect previously disturbed areas where stormwater controls are already installed. In these situations, the chance of encountering and of the subject species is discountable;
3. The project implements EPA MS4 Best Management Practices (BMPs) and meets Clean Water Act and Massachusetts Water Quality Standards. Although permitted discharges may reach the environment used by these species, BMPs reduce pollutants to the extent that discharges are not known to have measurable impacts on these species or their habitat;
4. No new construction or structural BMPs are proposed under this permit at this time; and
5. It is agreed that if, during the course of the permit term, it is planned to install a structural BMP not identified in the Notice of Intent (NOI), the Town will re-initiate with the U.S. Fish and Wildlife Services as necessary.

The aforementioned requirements are all met under this Permit and as such there is no reason to believe that the stormwater discharges, allowable non-stormwater discharges and discharge related activities will have any adverse effect on the aforementioned species or any other listed species or critical habitat. If any future stormwater projects or activities are proposed, the Town acknowledges that they will have to re-initiate either informal or formal consultation with USFWS as required under the MA MS4 General Permit Appendix C: Step 2(5).

The MS4 Environmental Overview Map in **Appendix A** includes Natural Heritage and Endangered Species Program (NHESP) estimated habitats of rare wildlife, priority habitats of rare species, certified vernal pools and wetlands. Future stormwater projects and activities proposed within these areas will require review for compliance with the Massachusetts ESA and the Wetlands Protection Act.

5.2 HISTORIC PROPERTIES

The MS4 Permit requires applicants to take into account the effects of Federal undertakings on historical properties that are either listed on or eligible for listing on the National Register of Historic Places. The NOI identified eligibility for National Historic Preservation Act under Criteria A. The proposed BMPs

outlined in this program have no potential to affect any historic properties because no changes are proposed to the existing MS4 infrastructure.

The MS4 Environmental Overview Map in **Appendix A** includes the Massachusetts Historical Commission's (MHC) inventory of historic points and areas. Future stormwater projects and activities proposed in and around these properties should be referenced against this map as well as the state register. The state register provides an up-to-date comprehensive listing of buildings, structures objects and sites that have received local, state or national designations based on their historical or archaeological significance.

5.3 SUMMARY OF RECEIVING WATERS AND IMPAIRMENTS

Surface Water Quality Standards (SWQS) are provided by the Massachusetts Department of Environmental Protection (DEP). They are determined for a water body's designated use. The SWQS designate the uses that surface waters are protected for, and an assessment is performed to determine if the designated uses are met by the water bodies. The use is not assessed in instances when there is insufficient data or information. Assessment information is maintained by the DEP in the Water Body System (WBS) database, which is updated every two years. Designated uses include:

- Aquatic Life
- Fish Consumption
- Primary Contact Recreation (Swimming)
- Secondary Contact Recreation (Boating)
- Aesthetics

The aquatic life use is supported when suitable habitat is available in the water body to sustain a native and diverse aquatic environment. Impairments to the aquatic life use can result from anthropogenic sources of pollution. Organic enrichment, flow and habitat alteration, sedimentation (habitat destruction), and whole effluent toxicity are potential causes of water body impairment for this use.

The fish consumption use is met when pollutant concentrations are acceptable for edible marketable fish or shellfish or for the use of recreationally caught fish or other aquatic life for human ingestion.

The primary contact recreational use is any activity that involves prolonged contact with the water with a significant risk of ingestion. Activities include swimming, diving, water skiing, and wading, among others. The secondary contact recreational use includes any activity with incidental water contact including boating, fishing, and other activities.

The aesthetic use is supported when water bodies do not contain objectionable deposits, floating debris, scum, or other matter, which produces offensive odors, colors, taste or turbidity or produces noxious aquatic life.

Total Maximum Daily Loads (TMDLs) are the amount of a pollutant allowed to be discharged into a water body per day to assure attainment of the SWQS. The sum total of all pollutant load allocations cannot exceed the total maximum allowable pollutant load calculated for the water body.

Impaired water bodies are those that are not expected to meet the SWQS due to specific pollutants or stressors. However, numerical data is not available for every pollution indicator, so best available guidance in the literature may be applied. Not all water bodies are assessed; many small and/or unnamed water bodies are currently not assessed.

According to the Massachusetts Year 2016 Integrated List of Waters, there are five categories for water quality assessment.

- Category 1 — Waters attaining all designated uses
- Category 2 — Attaining some uses; other uses not assessed
- Category 3 — No uses assessed
- Category 4A — TMDL is completed
- Category 4B — Impairment controlled by alternative pollution control requirements
- Category 4C — Impairment not caused by a pollutant – TMDL not required
- Category 5 — Waters requiring a TMDL

Within the designated MS4 area, Hull has five water body segments within the Town that receive flow from the MS4 with four designated as Category 5 Waters. **Table 5-1** summarizes these water bodies and the associated impairments requiring action, as described in the Permit and this SWMP. Information found in this table is based on the Massachusetts Year 2016 Integrated List of Waters.

These impaired water bodies and the MS4 areas tributary to them can be found on the MS4 Environmental Overview Map, which is can be found in **Appendix A**.

Appendix H of the Permit identifies specific requirements for water bodies that are Water Quality Limited in five categories of impairments (Nitrogen, Phosphorus, Bacteria/Pathogens, Chloride and Solids, Metals or Oil and Grease). These requirements apply to water bodies and their tributaries that do not meet applicable water quality standards, including but not limited to waters listed in category 5 and waters without an EPA approved TMDL.

Hull WQLW Impairment(s)

Bacteria and Pathogens

Appendix F of the Permit identifies specific requirements for discharges to impaired waters or their tributaries with an approved TMDL. Hull does not currently have any TMDL's however it is anticipated that they will be developed for the Fecal Coliform impairment.

Hull TMDL(s)

None at this time

5.4 REQUIREMENTS TO ADDRESS IMPAIRMENTS

The requirements specific to impairments of Hull’s receiving waters are summarized as follows:

Table 5-1: Town Water Bodies and Impairments

<u>Water Bodies Receiving Flow from Hull MS4 Regulated Area</u>			
<u>NAME</u>	<u>CATEGORY</u>	<u>SEGMENT ID</u>	<u>IMPAIRMENT CAUSE (EPA TMDL No.)</u>
Boston Harbor	5	MA70-01	Fecal Coliform PCBs in Fish Tissue Cause Unknown (Contaminants in Fish and/or Shellfish)
Hull Bay	5	MA70-09	Fecal Coliform PCBs in Fish Tissue Cause Unknown (Contaminants in Fish and/or Shellfish)
Weir River	5	MA74-11	Fecal Coliform PCBs in Fish Tissue Cause Unknown (Contaminants in Fish and/or Shellfish)
Hingham Bay	5	MA70-07	Fecal Coliform PCBs in Fish Tissue Cause Unknown (Contaminants in Fish and/or Shellfish)
Massachusetts Bay	-	-	Not yet designated in the Integrated Waters List, and therefore has no specific contaminants listed

Table 5-1 NOTE: Table Based on the Massachusetts Year 2016 Integrated List of Waters. Certain Pollutants (in **BOLD**) result in Total Maximum Daily Load (TMDL) or Water Quality Limited Water Bodies (WQLW) requirements defined in Appendix H & F of the Permit.

Bacteria and Pathogen WQLW and TMDL Requirements – *requirements are the same for WQLW and TMDL designation for this impairment*

Applicable Hull Receiving Waters: Weir River (MA74-11), Hingham Bay (MA70-07), Hull Bay (MA70-09), Boston Harbor (MA70-01)

Requirement: Any catchment area that discharges to a water body impaired for bacteria or pathogens must comply with enhanced BMPs in addition to the requirements to reduce pollutants to the maximum extent practicable outlined in Section 2.3 of the Permit and covered in **Section 7.0** of this report. Required enhancement of BMPs include:

Public Education – Supplement residential program with an annual message encouraging proper management of pet waste, distribute education materials to dog owners at the time of licensing and provide information to owners of septic systems about proper maintenance.

Illicit Discharge – Automatic designation of either “Problem” or “High Priority” in the implementation of the IDDE program.

Status: The Town has incorporated these enhancements into the BMPs in **Section 7.0** of this report.

Relief of Requirements to Address Impairments

The permit states that at any time during the permit term the permittee may be relieved of additional requirements in Appendix F and H as follows:

TMDLs (Appendix F):

- a. The permittee is relieved of its additional requirements as of the date when the following conditions are met:
 - i. The applicable TMDL has been modified, revised or withdrawn and EPA has approved a new TMDL applicable for the receiving water that indicates that no additional stormwater controls for the control said pollutant are necessary for the permittee's discharge based on wasteload allocations in the newly approved TMDL.
- b. In such a case, the permittee shall document the date of the approved TMDL in its SWMP and is relieved of any remaining requirements of Appendix F as of that date and the permittee shall comply with the following:
 - i. The permittee shall identify in its SWMP all activities implemented in accordance with the requirements of Appendix F to date to reduce the pollutant load in their discharges including implementation schedules for non-structural BMPs and any maintenance requirements for structural BMPs.
 - ii. The permittee shall continue to implement all requirements of Appendix F required to be implemented prior to the date of the newly approved TMDL, including ongoing implementation of identified non-structural BMPs and routine maintenance and replacement of all structural BMPs in accordance with manufacturer or design specifications.

Water Quality Limited Waterbodies (Appendix H):

- a. The permittee is relieved of its additional requirements as of the date when one of the following criteria are met:
 - i. The receiving water and all downstream segments are determined to no longer be impaired due to the named pollutant by MassDEP and EPA concurs with such determination.
 - ii. An EPA approved TMDL for the receiving water or downstream receiving water indicates that no additional stormwater controls for the control of said pollutant are necessary for the permittee's discharge based on waste load allocations as part of the approved TMDL.
- b. In such a case, the permittee shall document the date of the determination provided for in the paragraph above or the approved TMDL date in its SWMP and is relieved of any additional requirements of Appendix H as of the applicable date and the permittee shall comply with the following:

- i. The permittee shall identify in its SWMP all activities that have been implemented in accordance with the requirements of Appendix H. as of the applicable date to reduce the pollutant in its discharges, including implementation schedules for non-structural BMPs and any maintenance requirements for structural BMPs
- ii. The permittee shall continue to implement all requirements of Appendix H required to be done prior to the date of determination or the date of the approved TMDL, including ongoing implementation of identified nonstructural BMPs and routine maintenance and replacement of all structural BMPs in accordance with manufacturer or design specifications.

6.0 DISCHARGES

EPA has written the Permit to meet Massachusetts state water quality standards. Antidegradation provisions at 314 CMR § 4.04 are part of the current EPA-approved water quality standards for Massachusetts. As such, the Permit requires compliance with 314 CMR § 4.04 and increased discharges from MS4s remain subject to 314 CMR § 4.04.

6.1 INCREASED DISCHARGES AUTHORIZATION

The Massachusetts Stormwater Management regulations and the Town's current site development review practices prohibit increased discharges. They all require that any new development or re-development (including new impervious area) is subject to the Post-Construction Stormwater Management requirements, which include infiltration standards that are intended to mimic pre-development conditions. New impervious areas require the implementation of best management practices (BMPs). In a case where these conditions cannot be met, authorization for an increased discharge may be required.

Multiple listed water bodies in Town are identified as impaired waters on the Massachusetts Year 2016 Integrated List of Waters. As discussed in **Section 5.4**, this SWMP incorporates the required actions outlined in Appendix F and H of the Permit aimed at decreasing pollutants causing impairments to those water bodies. These actions combined with the implementation of post construction stormwater requirements will decrease the overall pollutant loading to all receiving waters over time. Town compliance with these requirements of the Permit, including all reporting and documentation, demonstrates no net increase in pollutant loading from the MS4.

6.2 DISCHARGES TO TMDL OR WATER QUALITY LIMITED WATERS

As previously noted, there are discharges in Town to waterbodies with either TMDL or Water Quality Limited impairments. **Table 5-1** highlights the TMDL(s) and/or Water Quality Limitations for each of Hull's listed water bodies. The MS4 area tributary to each water body is subject to the TMDL and/or Water Quality Limited Waters requirements (described in **Section 5.4**). A map of the MS4 discharge locations (i.e. outfalls and interconnections), the MS4 area tributary to each receiving water and the TMDL and/or Water Quality Limitation triggering additional requirements to reduce pollutant loading and protect water quality can be found in the IDDE report, which is located in **SWMP Volume 2**.

7.0 IMPLEMENTATION OF MINIMUM CONTROL MEASURES

The 2016 MS4 Permit states that the permittee shall continue to implement their 2003 MS4 SWMP while updating it pursuant to meet the requirements of the new permit. Upon adoption, this new SWMP supersedes the 2003 SWMP and all related deadlines and expectations. As indicated in the 2003 and 2016 MS4 permits, the permittee shall reduce the discharge of pollutants from the MS4 to the maximum extent practicable (MEP) using these 6 minimum control measures (MCM):

1. Public Education and Outreach
2. Public Involvement and Participation
3. Illicit Discharge Detection and Elimination (IDDE) Program
4. Construction Site Stormwater Runoff Control
5. Stormwater Management in New Development and Redevelopment (Post-Construction Stormwater Management)
6. Good House Keeping and Pollution Prevention for Permittee Owned Operations

7.1 PUBLIC EDUCATION AND OUTREACH (MCM 1)

The SWMP Team is responsible for ensuring the implementation of the public education and outreach program including measurable goals and reporting. Assisting departments for particular BMPs are listed below.

The Town is a member of the North South River Watershed Association (NSRWA) who helps communities meet both the MS4 and Water Management Act education requirements through their WaterSmart program. The Town is working with NSRWA to meet the public education and outreach requirements of the Permit. Public education and outreach materials can be found on the Town's website and at Town Hall. Web Links are listed in the Executive Summary of this document.

Reporting forms and logs to document public education and outreach efforts can be found in **Appendix B**. Requirements and documentation measures for specific BMPs are identified below and annual reporting requirements are described in **Section 10**.

Objective and Requirements

The main objective of this control measure is to implement an education program that includes education 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 pollutants in stormwater are reduced.

The minimum requirements specified in section 2.3.2 of the Permit are as follows:

1. Distribute at a minimum two (2) educational messages over the five (5) year Permit term to each of the following audiences: (1) residents, (2) businesses, institutions (churches, hospitals), and commercial facilities, (3) developers (construction), and (4) industrial facilities. Message shall focus on topics most relevant to the community.
2. Document in each annual report the message for each audience, method of distribution, the measures/methods used to assess the effectiveness of the messages, and the method/measures used to assess the overall effectiveness of the education program.
3. Comply with enhanced requirements related to approved TMDL for bacteria and pathogens which include:
 - Supplementing residential education program with an annual message encouraging proper management of pet waste.

- Distributing education materials to dog owners at the time of licensing.
 - Providing information to owners of septic systems about proper maintenance.
- In Hull, this includes Weir River (MA74-11), Hull Bay (MA70-09), Boston Harbor (MA70-01), and Hingham Bay (MA70-07).

Best Management Practices and Measurable Goals

BMP-1.1. Educate Residents I

Distribute first education message targeted to residents within the Town’s MS4 area.

Media/Location:	Press release, social media post, website and/or brochure
Responsible Party:	SWMP Team with NSRWA WaterSmart Regional Program
Measurable Goal(s):	<ul style="list-style-type: none"> • Distributed message to all residents within the Town’s MS4 area. • Recorded number of hard copies distributed, locations posted, attendance, webpage hits, etc. as applicable. • Completed within 1 years of effective date of Permit.

BMP-1.2. Educate Businesses, Institutions, and Commercial Facilities I

Distribute first education message targeted to business, institution, and commercial facility property owners within the Town’s MS4 area.

Media/Location:	Press release, social media post, website and/or brochure
Responsible Party:	SWMP Team with NSRWA WaterSmart Regional Program
Measurable Goal(s):	<ul style="list-style-type: none"> • Distribute message to all business, institution, and commercial facility property owners within the Town’s MS4 area. • Record number of hard copies distributed, locations posted, attendance, webpage hits, etc. as applicable. • Complete within 4 years of effective date of Permit.

BMP-1.3. Educate Developers and Contractors I

Distribute first education message targeted to developers and contractors within the Town’s MS4 area.

Media/Location:	Press release, social media post, website and/or brochure
Responsible Party:	SWMP Team with NSRWA WaterSmart Regional Program
Measurable Goal(s):	<ul style="list-style-type: none"> • Distributed message to all developers and contractors with active projects within the Town’s MS4 area. • Recorded number of hard copies distributed, locations posted, attendance, webpage hits, etc. as applicable. • Completed within 2 years of effective date of Permit.

BMP-1.4. Educate Industrial Facility Owners I

Distribute first education message targeted to industrial property owners within the Town’s MS4 area.

Media/Location:	Press release, social media post, website and/or brochure
Responsible Party:	SWMP Team with NSRWA WaterSmart Regional Program
Measurable Goal(s):	<ul style="list-style-type: none"> • Distribute message to all industrial property owners within the Town’s MS4 area. • Record number of hard copies distributed, locations posted, attendance, webpage hits, etc. as applicable. • Complete within 4 years of effective date of Permit.

BMP-1.5. Educate Residents II

Distribute second education message targeted to residents within the Town’s MS4 area.

Media/Location:	Press release, social media post, website and/or brochure
Responsible Party:	SWMP Team with NSRWA WaterSmart Regional Program
Measurable Goal(s):	<ul style="list-style-type: none"> • Distributed message to all residents within the Town’s MS4 area. • Recorded number of hard copies distributed, locations posted, attendance, webpage hits, etc. as applicable. • Completed within 2 years of effective date of Permit.

BMP-1.6. Educate Businesses, Institutions, and Commercial Facilities II

Distribute second education message targeted to business, institution, and commercial facility property owners within the Town’s MS4 area.

Media/Location:	Press release, social media post, website and/or brochure
Responsible Party:	SWMP Team with NSRWA WaterSmart Regional Program
Measurable Goal(s):	<ul style="list-style-type: none"> • Distribute message to all business, institution, and commercial facility property owners within the Town’s MS4 area. • Record number of hard copies distributed, locations posted, attendance, webpage hits, etc. as applicable. • Complete within 5 years of effective date of Permit.

BMP-1.7. Educate Developers and Contractors II

Distribute second education message targeted to developers and contractors within the Town’s MS4 area.

Media/Location:	Press release, social media post, website and/or brochure
Responsible Party:	SWMP Team with NSRWA WaterSmart Regional Program
Measurable Goal(s):	<ul style="list-style-type: none"> • Distribute message to all developers and contractors with active projects within the Town’s MS4 area. • Record number of hard copies distributed, locations posted, attendance, webpage hits, etc. as applicable. • Complete within 5 years of effective date of Permit.

BMP-1.8. Educate Industrial Facility Owners II

Distribute second education message targeted to industrial property owners within the Town’s MS4 area.

Media/Location:	Press release, social media post, website and/or brochure
Responsible Party:	SWMP Team with NSRWA WaterSmart Regional Program
Measurable Goal(s):	<ul style="list-style-type: none"> • Distribute message to all industrial property owners within the Town’s MS4 area. • Record number of hard copies distributed, locations posted, attendance, webpage hits, etc. as applicable. • Complete within 5 years of effective date of Permit.

Appendix H of the Permit requires implementation of the following BMPs due to Bacteria and Pathogen WQLW Requirements:

BMP-1.9. Educate Residents Annually on Proper Management of Pet Waste with Dog License Applications

Distribute annual education message targeted to pet owners in watershed areas with bacteria/pathogens TMDL or impairments.

Media/Location:	Brochures or pamphlets distributed with dog license
Responsible Party:	Town Clerk & SWMP Team
Measurable Goal(s):	<ul style="list-style-type: none"> • Distributed message to all residents when they (re)apply for a dog license. • Recorded number of hard copies distributed, and locations posted. • Complete annually.

BMP-1.10. Educate Residents Annually on Proper Management of Septic Systems

Distribute annual education message targeted to septic system owners in watershed areas with bacteria/pathogens TMDL or impairments.

Media/Location:	Brochures or pamphlets by mail and/or posted to website
Responsible Party:	SWMP Team with NSRWA WaterSmart Regional Program
Measurable Goal(s):	<ul style="list-style-type: none"> • Distributed message to all residents who have septic systems. • Recorded number of hard copies distributed, and locations posted. • Complete annually.

7.2 PUBLIC INVOLVEMENT AND PARTICIPATION (MCM 2)

The Town Director of Public Works is responsible for ensuring the implementation of proposed BMPs including measurable goals and reporting. Assisting departments for particular BMPs are listed below.

Reporting forms and logs to document public involvement and participation efforts can be found in **Appendix B**. Web Links and locations for specific BMPs identified below are listed in the Executive Summary and annual reporting requirements are described in **Section 10**.

Objective and Requirements

The main objective of this control measure is for the Town to provide opportunities to engage the public to participate in the review and implementation of the Town’s Stormwater Management Program (SWMP).

The minimum requirements specified in section 2.3.3 of the Permit are as follows:

1. Public involvement activities shall comply with state notice requirements (MGL Chapter 30A, Section 18-25 effective 7/10/2010). The SWMP and all annual reports shall be available to the public.
2. Annually provide the public an opportunity to participate in the review and implementation of the SWMP. Public participation opportunities may include, but are not limited to, websites; hotlines; clean-up teams; monitoring teams; or an advisory committee.
3. Report on the activities undertaken to provide public participation opportunities including compliance with state public notice requirements referenced above.

Best Management Practices and Measurable Goals

BMP-2.1. Public Review of Stormwater Management Program

Make SWMP available to review by Town residents.

Media/Location:	Website & DPW Office
Responsible Party:	Director of Public Works
Measurable Goal(s):	<ul style="list-style-type: none"> • Provided opportunity for residents to view the SWMP online and provide public access to the printed document. • Record website hits and requests to view printed document. • Update posted plan annually.

BMP-2.2. Public Participation and Comment of Stormwater Management Program

Record and review comments received by residents upon review of SWMP.

Media/Location:	Website & DPW Office
Responsible Party:	Director of Public Works
Measurable Goal(s):	<ul style="list-style-type: none"> • Keep a log of comments for review and consideration when annually updating the SWMP. • Include comment log in the annual report.

BMP-2.3. Public Participation Activities

Public participation activities may include meetings, cleanup teams, monitoring teams, hazmat drop off events, watershed organization events, hotlines, or an advisory committee.

Media/Location:	Website, Town Hall, DPW Office and at Hull Public Library
Responsible Party:	Director of Public Works
Measurable Goal(s):	<ul style="list-style-type: none"> • Advertise at least one activity per year. • Record method of advertising. Record the number of attendees and/or quantity of cleanup achieved. • Record compliance with state public notice requirements where applicable.

7.3 ILLICIT DISCHARGE DETECTION AND ELIMINATION (IDDE) PROGRAM (MCM 3)

The Department of Public Works is responsible for ensuring the implementation of proposed BMPs including measurable goals and reporting. Assisting departments for particular BMPs are listed below.

Reporting forms and logs to document IDDE efforts can be found in **Appendix B** and are expanded on in **SWMP Volume 2**. Requirements and documentation measures for specific BMPs are identified below and annual reporting requirements are described in **Section 10**.

Objective and Requirements

The main objective of this control measure is to systematically find and eliminate illicit sources of non-stormwater discharge to its municipal storm sewer system and implement procedures to prevent such discharges.

The minimum requirements specified in section 2.3.4 of the Permit are as follows:

1. Develop and implement a regulatory mechanism to provide adequate legal authority to the Town to implement and enforce the Illicit Discharge Detection and Elimination (IDDE) Program.
2. Develop an SSO inventory covering the previous five (5) years within one (1) year of the effective date of the Permit.
3. Update storm sewer system map for Phase I mapping requirements within two (2) years of the effective date of the Permit, annually update the mapping as new information is discovered, and develop a system wide storm sewer system map for Phase II mapping requirements within ten (10) years of Permit effective date.
4. Develop an IDDE Program within one (1) year of the effective date of the Permit.
5. Develop an initial inventory and a priority ranking of outfalls/interconnections within one (1) year of the effective date of the Permit and update annually.
6. Develop a catchment investigation program within 18 months of the effective date of the Permit and implement according to the IDDE program.
7. Record and report in each annual report about the IDDE program progress and overall effectiveness.
8. Ongoing screening plan of outfalls once every five years.
9. Provide training to employees involved in the IDDE program annually. The training frequency and type shall be reported in the annual report.
10. Comply with enhanced requirements as specified in the appendix H of the Permit regarding Impaired Waters requirements as follows:
 - Automatic designation of either “Problem Catchment” or “High Priority” in the implementation of the IDDE program for catchments discharging to waters where illicit discharges have potential to contain pollutant identified as the cause of the water quality impairment.

In Hull, this includes Weir River (MA74-11), Hull Bay (MA70-09), Boston Harbor (MA70-01), and Hingham Bay (MA70-07).

Best Management Practices and Measurable Goals

BMP-3.1. IDDE Legal Authority

An IDDE Legal Authority must be adopted with the authorized enforcement agency identified.

Media/Location:	Bylaw and Regulations on Website
Responsible Party:	SWMP Team
Measurable Goal(s):	<ul style="list-style-type: none"> Regulation adopted June 23, 2021 by the Board of Selectmen

BMP-3.2. Sanitary Sewer Overflow (SSO) Inventory

Develop and maintain an SSO inventory that covers the previous five years in accordance of Permit conditions.

Media/Location:	The inventory is included as Appendix G of the SWMP Volume 2: IDDE Plan.
Responsible Party:	Director of Public Works
Measurable Goal(s):	<ul style="list-style-type: none"> Inventory completed (by Year 1). In the event of an overflow or bypass, provide notification with 24 hrs to MassDEP & EPA followed by a written report within 5 calendar days. Update annually if becomes applicable.

BMP-3.3. Storm Sewer System Map

Update storm sewer system map in accordance with Permit mapping requirements.

Media/Location:	The map is included as Appendix A of the SWMP Volume 2: IDDE Plan.
Responsible Party:	Director of Public Works
Measurable Goal(s):	<ul style="list-style-type: none"> Updated map within 3 years of effective date of Permit for Phase 1 mapping. Update annually as new/corrected information is discovered. Complete full system map (Phase 2) within 10 years of effective date of Permit

BMP-3.4. Written IDDE program

Develop/update written IDDE program.

Media/Location:	SWMP Volume 2: IDDE Plan. Website & DPW Office
Responsible Party:	Director of Public Works
Measurable Goal(s):	<ul style="list-style-type: none"> • Written program completed (by year 1). • Update as required.

BMP-3.5. Implement IDDE Program

Implement catchment investigations according to IDDE program and Permit conditions and based on the outfall/interconnection inventory, initial ranking and dry weather outfall and interconnection screening and sampling results.

Media/Location:	SWMP Volume 2: IDDE Plan. Website & DPW Office
Responsible Party:	Director of Public Works
Measurable Goal(s):	<ul style="list-style-type: none"> • Conduct 100% of catchment investigations for “Problem” outfalls within 7 years of effective date of Permit • Conduct 100% of catchment investigations for all outfalls within 10 years of effective date of Permit. • Report results and progress in annual report.

BMP-3.6. Employee Training

Provide annual training on IDDE implementation in accordance with IDDE program.

Media/Location:	SWMP Volume 2: IDDE Plan. Website & DPW Office
Responsible Party:	Director of Public Works
Measurable Goal(s):	<ul style="list-style-type: none"> • Conduct annual IDDE training (Year 1 Complete; Year 2 COVID-19 postponement). • Provide record of training and attendance in annual report.

BMP-3.7. Dry Weather Screening and Sampling

Conduct dry outfall screening and sampling of outfalls/interconnections in MS4 area in accordance IDDE program

Media/Location:	SWMP Volume 2: IDDE Plan. Website & DPW Office
Responsible Party:	Director of Public Works
Measurable Goal(s):	<ul style="list-style-type: none"> Completed dry outfall screening and sampling within 3 years of effective date of Permit. Reported results and progress in annual report.

BMP-3.8. Wet Weather Sampling of Outfalls

Conduct wet weather outfall sampling in accordance with IDDE program. This sampling can be done upon completion of any dry weather investigation but must be completed before the catchment investigation is marked as complete.

Media/Location:	SWMP Volume 2: IDDE Plan. Website & DPW Office
Responsible Party:	Director of Public Works
Measurable Goal(s):	<ul style="list-style-type: none"> Complete wet weather outfall sampling of “Problem” outfalls within 7 years of effective date of Permit Complete wet weather outfall sampling of all outfalls within 10 years of effective date of Permit. Report results and progress in annual report.

BMP-3.9. Ongoing Screening

Conduct ongoing dry weather and wet weather screening and sampling (as necessary) of outfalls in accordance with IDDE program.

Media/Location:	SWMP Volume 2: IDDE Plan. Website & DPW Office
Responsible Party:	Director of Public Works
Measurable Goal(s):	<ul style="list-style-type: none"> Complete ongoing outfall screening within 5 years of completing catchment investigations. Report results and progress in annual report.

7.4 CONSTRUCTION SITE STORMWATER RUNOFF CONTROL (MCM 4)

The Conservation Commission is responsible for ensuring the implementation of proposed BMPs and measurable goals. Assisting departments for particular BMPs are listed below.

Regulations, requirements and guidance on construction site stormwater runoff control can be found on the Town's Website and at the Conservation Commission Office. Web Links and locations for specific BMPs identified below are listed in the Executive Summary.

Reporting forms and logs to document these efforts can be found in **Appendix B**. Reporting measures for specific BMPs are identified below and reporting requirements are described in **Section 10**.

Objective and Requirements

The objective of this construction stormwater runoff control program is to minimize or eliminate erosion and maintain sediments on site so that it is not transported in stormwater and allowed to discharge to a water of the U.S through the Town's MS4.

The minimum Permit requirements in accordance with MS4-2016 section 2.3.5 are as follows:

1. Implement and enforce a program to reduce pollutants in stormwater runoff discharge to the MS4 from all construction activities that result in land disturbance greater than or equal to one acre within regulated area.
2. Develop and implement a construction site runoff control program with written procedures and a regulatory mechanism for site plan review and enforcement within one (1) year from effective date of the Permit. Program must include the following elements for sediment and erosion control:
 - a. Regulatory mechanism that requires the use of sediment and erosion control practices at construction sites including controls for other wastes on construction sites
 - b. Written procedures for site inspection and enforcement
 - c. Sediment and erosion control requirements for construction site operators performing land disturbance activities
 - d. Requirements to control waste from construction sites
 - e. Written procedures for site plan review and inspection and enforcement

Best Management Practices and Measurable Goals

BMP-4.1. Sediment and Erosion Control Regulation

Bylaws/regulations are necessary to meet Permit requirements for sediment and erosion control practices

Media/Location:	Bylaw on Website
Responsible Party:	Conservation Commission
Measurable Goal(s):	<ul style="list-style-type: none"> Regulation Update (June 23, 2021) Implement for 100% of applicable projects

BMP-4.2. Site Inspections and Enforcement of Erosion and Sediment Control Measures.

Provide/update written requirements for site inspections and enforcement procedures.

Media/Location:	SWMP Volume 1: Appendix B. Website & DPW Office
Responsible Party:	Conservation Commission
Measurable Goal(s):	<ul style="list-style-type: none"> Written procedures completed (by Year 1) Implemented for 100% of applicable projects. Conducted construction site inspections consistent with the written procedures. Keep records of inspections.

BMP-4.3. Site Plan Review

Provide/update written procedures for site plan review and begin implementation.

Media/Location:	SWMP Volume 1: Appendix B. Website & DPW Office
Responsible Party:	Conservation Commission
Measurable Goal(s):	<ul style="list-style-type: none"> Written procedures completed (by Year 1) Implemented for 100% of applicable projects. Keep records of projects submitted for site plan review.

BMP-4.4. Construction Site Operators Erosion and Sediment Control Program

Provide/update written requirements for construction operators to implement a sediment and erosion control program.

Media/Location:	SWMP Volume 1: Appendix B. Website & DPW Office
Responsible Party:	Conservation Commission
Measurable Goal(s):	<ul style="list-style-type: none"> Written procedures completed (by Year 1) Implemented for 100% of applicable projects. During construction site inspections review for erosion controls and make note of compliance status. Keep records of inspections.

BMP-4.5. Construction Waste Control

Adopt requirements to control wastes, including but not limited to, discarded building materials, concrete truck wash out, chemicals, litter, and sanitary wastes

Media/Location:	SWMP Volume 1: Appendix B. Website & DPW Office
Responsible Party:	Conservation Commission
Measurable Goal(s):	<ul style="list-style-type: none"> • Written procedures completed (by Year 1) • Implemented for 100% of applicable projects. • During construction site inspections review for waste control and make note of compliance status. Keep records of inspections.

7.5 STORMWATER MANAGEMENT IN NEW DEVELOPMENT AND REDEVELOPMENT (POST CONSTRUCTION STORMWATER MANAGEMENT) (MCM 5)

The Conservation Commission is responsible for ensuring the implementation of proposed BMPs and measurable goals. Assisting departments for particular BMPs are listed below.

Regulations, requirements, and guidance on post construction stormwater management can be found on the Town's website & Conservation Commission office. Web Links and locations for specific BMPs are listed in the executive summary of this document.

Reporting forms and logs to document these efforts can be found in **Appendix B**. Reporting measures for specific BMPs are identified below and reporting requirements are described in **Section 10**.

Objective and Requirements

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.

The minimum Permit requirements in accordance with MS4-2016 section 2.3.6 are as follows:

1. Develop, implement, and enforce a program to address post-construction stormwater runoff from all new development and redevelopment sites that disturb one or more acres and discharge into the permittees MS4 at a minimum.
 - Update Permit requirement and regulations to require for development projects the use of LID techniques to the maximum extent feasible
 - Develop/update Permit requirements and stormwater regulations to meet new development and redevelopment design requirements of Permit
 - Update Permit requirement and regulations to require submission of as-built drawings and ensure long term operation and maintenance will be a part of the SWMP
2. Develop a report assessing current street design and parking lot guidelines and other local requirements that affect the creation of impervious cover within four (4) years from effective date of the Permit.
3. Develop a report assessing existing local regulation to determine if green infrastructures are allowable when appropriate site conditions exist. This report shall be completed within four (4) years from the effective date of the Permit.
4. Identify within four (4) years from the effective date of the Permit a minimum of 5 permittee-owned properties that could potentially be modify or retrofitted with BMPs.

Best Management Practices and Measurable Goals

BMP-5.1. Low Impact Development (LID) Techniques

Update Permit requirement and regulations to require for development projects the use of LID techniques to the maximum extent feasible.

Media/Location:	Bylaw and Regulations on Website
Responsible Party:	Conservation Commission
Measurable Goal(s):	<ul style="list-style-type: none"> • Complete within 4 years of the effective date of Permit. • Implement for 100% of applicable projects. • Keep records of development projects approved with LIDs.

BMP-5.2. New Development and Redevelopment (Post-Construction) Design Regulations

Develop/update Permit requirements and stormwater regulations to meet new development and redevelopment design requirements of Permit

Media/Location:	Bylaw and Regulations on Website
Responsible Party:	Conservation Commission
Measurable Goal(s):	<ul style="list-style-type: none"> • Completed within 3 years of the effective date of Permit. • Implement for 100% of applicable projects. • Keep records of development projects approved to meet regulations.

BMP-5.3. As-Built Plans

Update Permit requirement and regulations to require submission of as-built drawings and ensure long term operation and maintenance will be a part of the SWMP

Media/Location:	Bylaw and Regulations on Website
Responsible Party:	Conservation Commission
Measurable Goal(s):	<ul style="list-style-type: none"> • Completed within 2 years of the effective date of Permit. • Implemented for 100% of applicable projects. • Keep records of projects requiring and fulfilling as-built and O&M requirements.

BMP-5.4. Street Design and Parking Lot Guidelines Report

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.

Media/Location:	Website & DPW Office
Responsible Party:	DPW and Conservation Commission
Measurable Goal(s):	<ul style="list-style-type: none"> • Complete within 4 years of the effective date of Permit. • Implement recommendations of the report. • Report progress of implementation annually.

BMP-5.5. Green Infrastructure Report

Develop a report assessing local regulations to determine feasibility of allowing green roofs, raingardens, water harvesting and other similar practices.

Media/Location:	Website & DPW Office
Responsible Party:	DPW and Conservation Commission
Measurable Goal(s):	<ul style="list-style-type: none"> • Complete within 4 years of the effective date of Permit. • Implement recommendations of the report. • Report progress of implementation annually.

BMP-5.6. List of 5 properties to Provide (effective) Reduction of Impervious area

Identify and maintain a list of at least 5 permittee-owned properties that could be modified or retrofitted with BMPs to reduce impervious areas and update annually

Media/Location:	Department of Public Works
Responsible Party:	DPW
Measurable Goal(s):	<ul style="list-style-type: none"> • Complete within 4 years of the effective date of Permit. • Update as needed and report annually on retrofitted properties.

7.6 GOOD HOUSEKEEPING AND POLLUTION PREVENTION FOR PERMITTEE OWNED OPERATIONS (MCM 6)

The Department of Public Works is responsible for ensuring the implementation of proposed BMPs and measurable goals. Assisting departments for particular BMPs are listed below.

Reporting forms and logs to document these efforts can be found in **Appendix B** and are to be expanded upon in **SWMP Volume 3**. Reporting measures for specific BMPs are identified below and reporting requirements are described in **Section 10**.

Objective and Requirements

The Town will 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 Town-owned operations.

The minimum Permit requirements in accordance with MS4-2016 section 2.3.7 are as follows:

1. Develop an Operations and Maintenance (O&M) Program for Town-owned facilities within three (3) years from effective date of the Permit.
2. Inventory of all Town owned facilities within three (3) years from the effective date of the Permit.
3. Develop an Infrastructure Operations and Maintenance Program within three (3) years from the effective date of the Permit.
4. Optimize routine inspections, cleaning and maintenance of catch basins.
5. Establish and implement procedures for sweeping and/or cleaning streets and Town-owned parking lots.
6. Ensure proper storage of catch basins cleanings and street sweepings prior to disposal.
7. Establish and implement procedures for winter road maintenance.
8. Establish and implement inspections and maintenance of stormwater treatment structures.
9. Develop Stormwater Pollution Prevention Plans (SWPPPs) for Town-owned or -operated facilities within two (2) years from effective date of the Permit.

Best Management Practices and Measurable Goals

BMP-6.1. Parks and Open Space Operations and Maintenance Procedures

Create written O&M procedures including all requirements of the Permit for Town owned parks and open spaces.

Media/Location:	SWMP Volume 3: O&M Plan. DPW Office
Responsible Party:	Department of Public Works
Measurable Goal(s):	<ul style="list-style-type: none"> • Completed within 3 years of effective date of Permit. • Implement on 100% of Town owned parks and open spaces. • Keep records of O&M performed and report annually.

BMP-6.2. Buildings and Facilities Operations and Maintenance Procedures

Create written O&M procedures including all requirements of the Permit for Town owned buildings and facilities.

Media/Location:	SWMP Volume 3: O&M Plan. DPW Office
Responsible Parties:	Department of Public Works with assistance from Schools & Facilities
Measurable Goal(s):	<ul style="list-style-type: none"> • Completed within 3 years of effective date of Permit. • Implement on 100% of Town owned buildings and facilities. • Keep records of O&M performed and report annually.

BMP-6.3. Vehicles and Equipment Operations and Maintenance Procedures

Create written O&M procedures including all requirements of the Permit for Town owned vehicles and equipment.

Media/Location:	SWMP Volume 3: O&M Plan. DPW Office
Responsible Parties:	Department of Public Works, Police, Fire
Measurable Goal(s):	<ul style="list-style-type: none"> • Completed within 3 years of effective date of Permit. • Implement on 100% of Town owned vehicles and equipment. • Keep records of O&M performed and report annually.

BMP-6.4. Inventory all Permittee-Owned Parks and Open Spaces, Buildings and Facilities, and Vehicles and Equipment

Create an inventory of Town owned parks and open spaces, buildings and facilities, and vehicles and equipment facilities for implementation of O&M Plan.

Media/Location:	SWMP Volume 3: O&M Plan. DPW Office
Responsible Parties:	Department of Public Works
Measurable Goal(s):	<ul style="list-style-type: none"> Completed within 3 years of effective date of Permit. Update inventory annually.

BMP-6.5. Municipal Infrastructure Operation and Maintenance Program

Develop and implement program to ensure proper function of the MS4 stormwater infrastructure.

Media/Location:	SWMP Volume 3: O&M Plan. DPW Office
Responsible Party:	Department of Public Works
Measurable Goal(s):	<ul style="list-style-type: none"> Completed within 3 years of effective date of Permit. Implement so that 100% of infrastructure is maintained and functioning properly. Keep records of O&M performed and report annually.

BMP-6.6. Catch Basin Cleaning Program

Develop written program for catch basin cleaning with a goal that each catch basin is no more than 50% full at any given time.

Media/Location:	SWMP Volume 1: Appendix B. Website & DPW Office
Responsible Party:	Department of Public Works
Measurable Goal(s):	<ul style="list-style-type: none"> Written program completed (by Year 1). Cleaned catch basins on established schedule. Reported number of catch basins cleaned, and volume of material moved annually.

BMP-6.7. Street Sweeping Program

Develop and implement a street sweeping program so that all streets and municipal parking lots are swept in accordance with Permit conditions.

Media/Location:	SWMP Volume 1: Appendix B. Website & DPW Office
Responsible Party:	Department of Public Works
Measurable Goal(s):	<ul style="list-style-type: none"> Written program completed (by Year 1). Annually swept all streets and municipal parking lots in accordance with established schedule. Keep records of sweeping and report annually.

BMP-6.8. Winter Road Maintenance Program

Develop and implement a program to manage storage and use of road salt.

Media/Location:	SWMP Volume 1: Appendix B. Website & DPW Office
Responsible Party:	Department of Public Works
Measurable Goal(s):	<ul style="list-style-type: none"> • Written program completed (by Year 1). • Implement program as necessary. • Evaluate at least one salt/chloride alternative

BMP-6.9. Stormwater Treatment Structures Inspections and Maintenance Procedures

Develop and implement inspection and maintenance procedures and frequencies for Town-owner stormwater BMPs (excluding catch basins).

Media/Location:	SWMP Volume 1: Appendix B. Website & DPW Office
Responsible Party:	Department of Public Works
Measurable Goal(s):	<ul style="list-style-type: none"> • Written procedures completed (by Year 1). • Inspected and maintained 100% of BMPs treatment structures at least annually. • Keep records of inspection and maintenance performed and report annually.

BMP-6.10. Stormwater pollution prevention plan (SWPPP)

Develop and implement SWPPPs for facility maintenance garages, transfer stations, and other waste-handling facilities.

Media/Location:	SWMP Volume 3: O&M Plan. DPW Office
Responsible Party:	Department of Public Works
Measurable Goal(s):	<ul style="list-style-type: none"> • Developed and implemented SWPPPs within 2 years of effective date of Permit. • Keep records of inspection and maintenance performed and report as required in the SWPPPs.

8.0 SANITARY SEWER OVERFLOWS INVENTORY

The Town has identified and inventoried all known locations where SSOs have discharged to the MS4 within the previous five (5) years. This inventory is provided and maintained as part of **SWMP Volume 2: IDDE Plan**.

9.0 SURFACE DRINKING WATER SUPPLY SOURCES

Section 3.0 of the Permit addresses requirements for MS4 systems that discharge to public surface drinking water supply sources (Class A and Class B surface waters used for drinking water) or their tributaries. According to 314 CMR 4.00, Massachusetts Surface Water Quality Standards, 4.05: Classes and Criteria and 4.06: Basin Classification and Maps, Hull does not include any watershed tributary to reservoirs or surface waters which are drinking water supplies.

10.0 ANNUAL PROGRAM EVALUATION

Program evaluation, record keeping, and reporting are required annually to document what the Town has done during the previous reporting period, judge compliance with Permit provisions, and to verify that efforts are resulting in an improvement to the stormwater, and ultimately the receiving water's quality.

The Town is required to submit annual reports each year of the Permit term. The reporting period is a one-year period commencing on the Permit effective date (July 1, 2018) and each anniversary thereafter. The exception is that the first annual report will also include the period from May 1, 2018 to June 30, 2019. Annual reports are due ninety days from the close of the reporting period (September 30). The annual reports will review compliance with the Permit terms and conditions including assessment of selected BMPs, status and progress assessment of planned activities, description of IDDE and O&M program activities, evaluation of construction and post construction stormwater management, and the method/measures used to assess the overall effectiveness of the education program. Description of activities for the next reporting cycle and any changes in identified BMPs or measurable goals will be included. The following data will be collected and reported by the Town using the reporting forms in **Appendix B** to support the ongoing efforts mandated by the Permit:

- Public education and outreach materials with dated distribution/attendance list(s)
- Public involvement and participation materials with dated distribution/attendance list(s)
- Data related to Implementation of the IDDE Program including:
 - SSO reporting forms and updated inventory table
 - Illicit discharge reporting forms and inventory table
 - Outfall screening and sampling data
 - Record of mapping updates
 - Inventory of catchment investigations, data collected, and illicit connections removed
 - Outfall and catchment ranking and assessment updates (Updated Matrix)
 - IDDE program training attendance log
- Inventory of construction runoff management including number of projects reviewed, inspected and enforcement actions
- Inventory of site plan review and BMP implementation for new/re-development projects
- O&M inspection and maintenance forms and logs including:
 - Catch basin cleaning and activities
 - Street sweeping and parking lot sweeping logs
 - MS4 infrastructure BMP inspection forms and logs
 - Town facilities inspection forms and logs
 - SWPPP inspection reports

EPA has developed an annual report template for MS4s which will populate information from the NOI and be in the form of an electronic fillable PDF. The Town plans to use this template and will review the annual report template to determine the best method for data management to be compatible.

APPENDIX A

- Environmental Overview Map

Town of Hull, Massachusetts

Environmental Overview Map

Map Legend

Stormwater Structures

- Outfall
- Interconnection
- Leaching Catch Basin
- Town Owned Catch Basin
- State Owned Catch Basin
- Town Owned Manhole
- State Owned Manhole
- Inlet

Conveyance

- Pipe
- Culvert
- Swale/Channel

Historic Data

- Historic - Point
- Historic - Area

Conservation

- NHESP Certified Vernal Pools
- NHESP Estimated Habitats of Rare Wildlife
- NHESP Priority Habitats of Rare Species
- DCR Owned Area

Regulated Areas

- MA MS4 Urban Area

***MassDEP 2016 Integrated List of Waters**

- Rivers: Category 4A
- Lakes, Estuaries: Category 4A
- Rivers: Category 4C
- Lakes, Estuaries: Category 4C
- Rivers: Category 5
- Lakes, Estuaries: Category 5

Hydrography

Hydrologic Connection

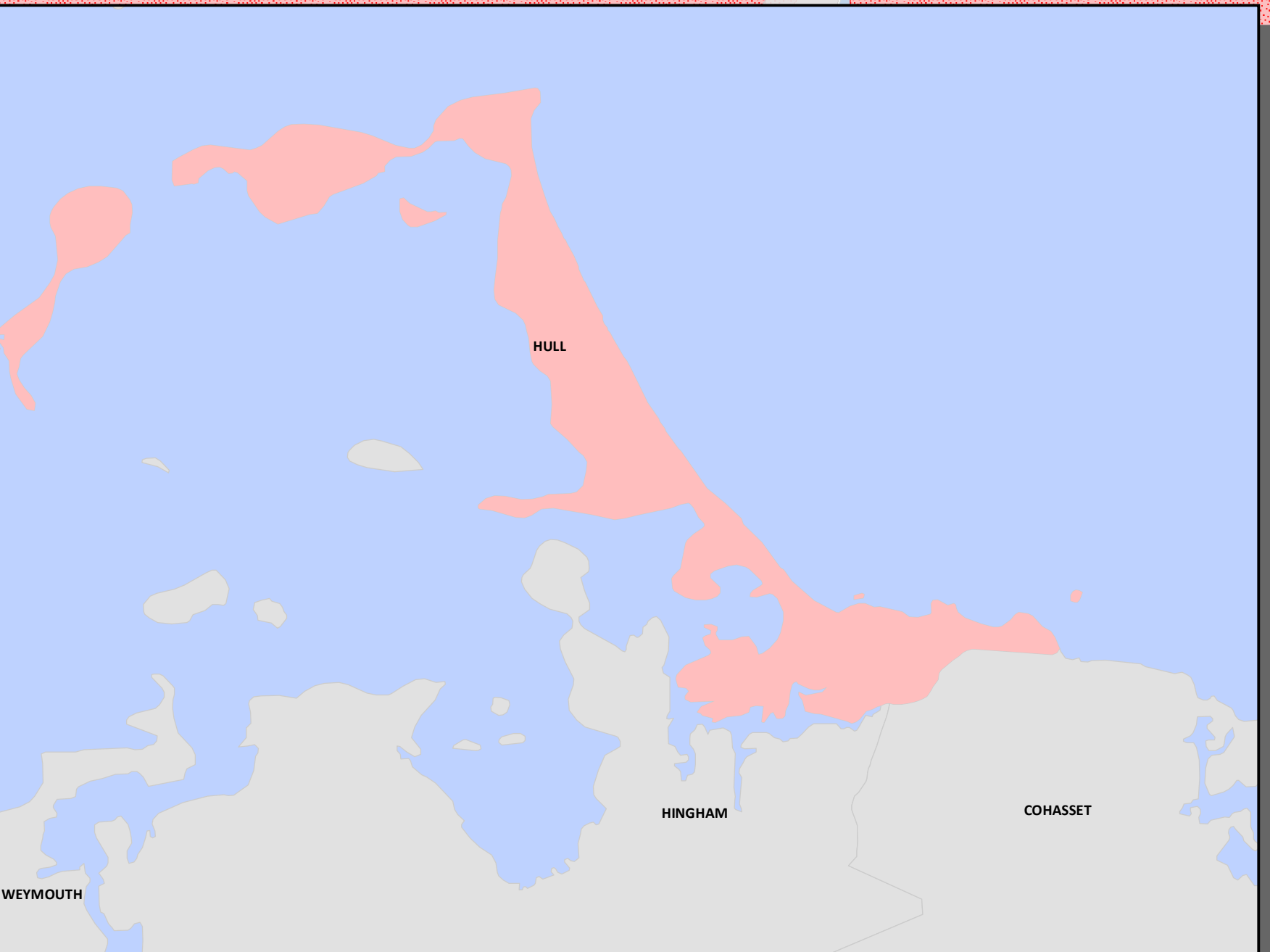
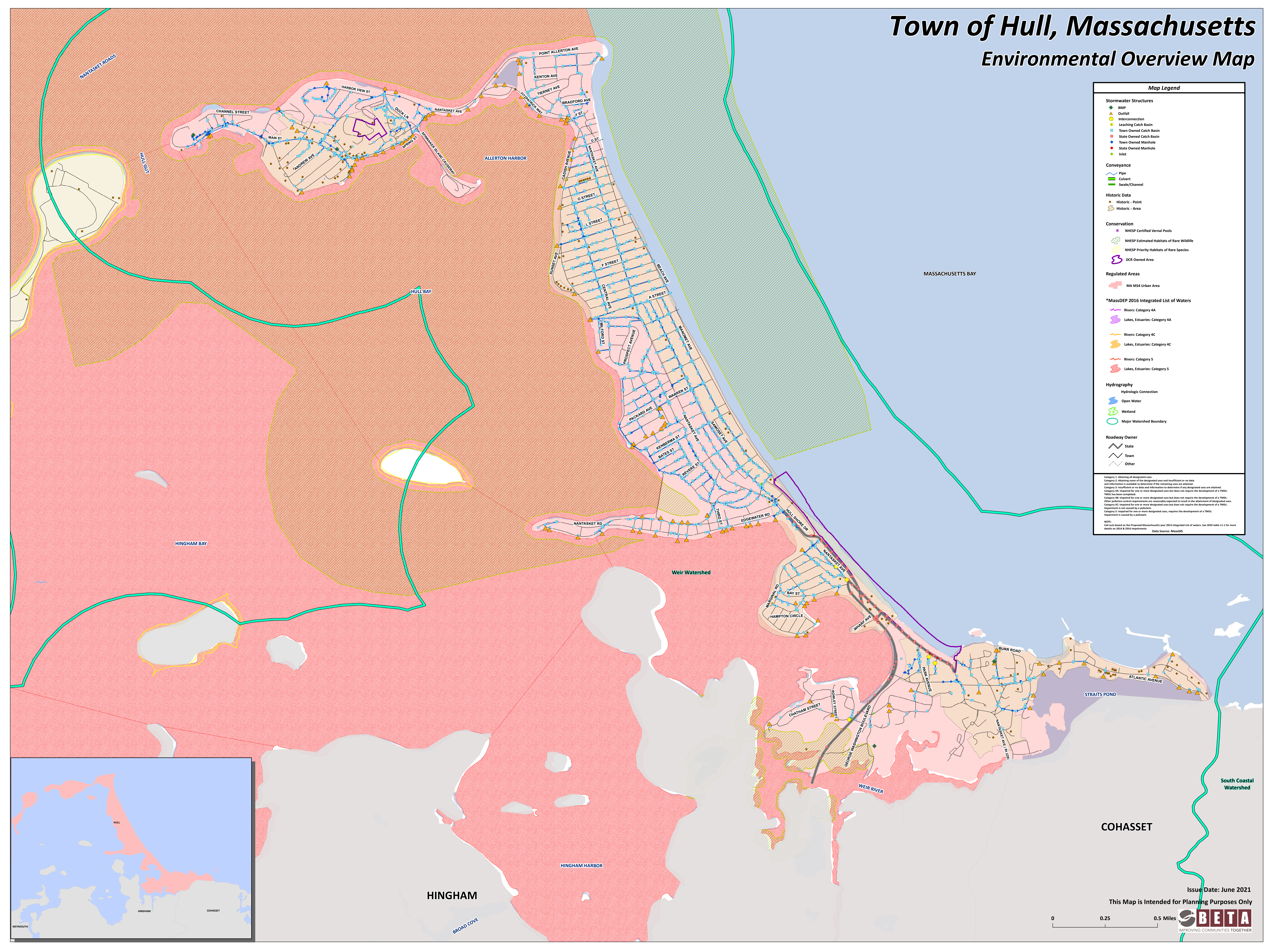
- Open Water
- Wetland
- Major Watershed Boundary

Roadway Owner

- State
- Town
- Other

Category 2: Attaining all designated uses.
 Category 3: Attaining some of the designated uses and insufficient or no data and information is available to determine if the remaining uses are attained.
 Category 4: Insufficient or no data and information to determine if any designated uses are attained.
 Category 5: Impaired for one or more designated uses but does not require the development of a TMDL. This has been completed.
 Category 6: Impaired for one or more designated uses but does not require the development of a TMDL. Other pollution control requirements are reasonably expected to result in the attainment of designated uses.
 Category 7: Impaired for one or more designated uses but does not require the development of a TMDL. Impairment is not caused by a pollutant.
 Category 8: Impaired for one or more designated uses, requires the development of a TMDL. Impairment is caused by a pollutant.

NOTE:
 Call area based on the Proposed Massachusetts year 2016 Integrated List of waters. See 804C Table 13-1 for more details on 2014 & 2016 Impairments. Data Source: MassGIS



APPENDIX B

- **Reporting Forms**

MCM 2: PUBLIC INVOLVEMENT & PARTICIPATION LOG

Reporting Period: _____ - _____

RECORD OF SWMP AND ANNUAL REPORT POSTING FOR PUBLIC REVIEW

Date	Responsible Party	Public Notice Provided	Location of Posting	Record of Measurable Goal*

*May include: web page hits, requests to view printed document, # of comments received

RECORD OF PUBLIC COMMENTS

Date	Comment From	Received Via	Comment

RECORD OF PUBLIC PARTICIPATION ACTIVITIES

Date	Responsible Party	Public Notice Provided	Activity	Record of Measurable Goal*

*May include: # of participants, attendees, and/or quantity of cleanup achieved

Note: See section 7.2 of SWMP for BMP reporting descriptions and requirements.

MCM 3: IDDE PROGRAM REPORTING SUMMARY LOG

The Town has completed a written IDDE Plan which includes detailed reporting forms to document IDDE efforts. These can be found in Storm Water Management Plan Volume 2. The Town will keep a summary log for annual reporting as follows:

Reporting Period: _____ - _____

EMPLOYEE TRAINING

Date	# of Attendees	Location	Presenter	Topic/Discussion Items

SSO INVENTORY

Report #	Date	Reporter	Location	Status & Comments

ILLICIT DISCHARGE INVENTORY

Report #	Date	Reporter	Location	Status & Comments

STORM SEWER MAPPING UPDATES

Type	Date	Updated by	Location	Description

OUTFALL SCREENING AND SAMPLING

Dry/Wet	Date(s)	Inspector	Location(s)	Comments

CATCHMENT INVESTIGATIONS

Category	Date(s)	Inspector	Location	Description/Results

Note: See section 7.3 of SWMP for BMP reporting descriptions and requirements.

Town of Hull, MA

Report No. _____

MCM 4: CONSTRUCTION SITE INSPECTION FORM

The Town has a Stormwater Management Bylaw (Chapter 354) and permits through various Town Boards to address post-construction stormwater runoff. Record all inspections using this form and provide an entry in site inspection log (and enforcement action log if applicable) for annual reporting.

Project:		Date:		Last Insp:	
Location:		Arrive:		Leave:	
Operator:		Site Rep:			
Inspector:					
Type	<input type="checkbox"/> Regular	<input type="checkbox"/> Pre-Storm	<input type="checkbox"/> During Storm	<input type="checkbox"/> Post Storm	
Recent Rainfall:			Current Weather:		
Description of Current Site Work:					
Add. Info:					

EROSION AND SEDIMENT CONTROL MAINTENANCE/ACTION REQUIRED: YES NO

(Inspect for all applicable controls listed – ECB = Erosion Control Barrier)

Control	Condition	Required Action	Completed (by)	Date
<input type="checkbox"/> SWPPP Report(s)			<input type="checkbox"/>	
<input type="checkbox"/> Adjacent Street			<input type="checkbox"/>	
<input type="checkbox"/> Const. Access Dr.			<input type="checkbox"/>	
<input type="checkbox"/> Perimeter ECB			<input type="checkbox"/>	
<input type="checkbox"/> Outside ECB			<input type="checkbox"/>	
<input type="checkbox"/> Sediment Basin(s)			<input type="checkbox"/>	
<input type="checkbox"/> CB Protection			<input type="checkbox"/>	
<input type="checkbox"/> Stockpiles			<input type="checkbox"/>	
<input type="checkbox"/> Exposed Soils			<input type="checkbox"/>	
<input type="checkbox"/> Exposed Slopes			<input type="checkbox"/>	
<input type="checkbox"/> Outlet(s)			<input type="checkbox"/>	
<input type="checkbox"/> Receiving Waters			<input type="checkbox"/>	
<input type="checkbox"/> Other			<input type="checkbox"/>	



CONSTRUCTION WASTE CONTROL MAINTENANCE/ACTION REQUIRED: YES NO

(Inspect for all applicable controls listed)

Control	Condition	Required Action	Completed (by)	Date
<input type="checkbox"/> Trash/Litter			<input type="checkbox"/>	
<input type="checkbox"/> Dumpsters			<input type="checkbox"/>	
<input type="checkbox"/> Fueling Areas			<input type="checkbox"/>	
<input type="checkbox"/> Sanitary Facilities			<input type="checkbox"/>	
<input type="checkbox"/> Dewatering			<input type="checkbox"/>	
<input type="checkbox"/> Haz Mat Storage			<input type="checkbox"/>	

SITE PHOTOS

MCM 4: CONSTRUCTION SITE RUNOFF CONTROL - STORMWATER SITE PLAN REVIEW

The Town has a Stormwater Management Bylaw (Chapter 354) and permits through various Town Boards to address post-construction stormwater runoff. Site plans will be reviewed for compliance with the Ordinance and regulations based on the attached checklist. The Town will keep record of site plan reviews in each annual report as follows:

SITE PLAN REVIEW LOG

Reporting Period: _____ – _____

Project/Location	Filing Date	Reviewer	Requirements Met	Project Status
			<input type="checkbox"/> LIDs <input type="checkbox"/> SW Design Regs <input type="checkbox"/> As-built <input type="checkbox"/> Long-term O&M	
Description/Comments:				
			<input type="checkbox"/> LIDs <input type="checkbox"/> SW Design Regs <input type="checkbox"/> As-built <input type="checkbox"/> Long-term O&M	
Description/Comments:				
			<input type="checkbox"/> LIDs <input type="checkbox"/> SW Design Regs <input type="checkbox"/> As-built <input type="checkbox"/> Long-term O&M	
Description/Comments:				
			<input type="checkbox"/> LIDs <input type="checkbox"/> SW Design Regs <input type="checkbox"/> As-built <input type="checkbox"/> Long-term O&M	
Description/Comments:				
			<input type="checkbox"/> LIDs <input type="checkbox"/> SW Design Regs <input type="checkbox"/> As-built <input type="checkbox"/> Long-term O&M	
Description/Comments:				
			<input type="checkbox"/> LIDs <input type="checkbox"/> SW Design Regs <input type="checkbox"/> As-built <input type="checkbox"/> Long-term O&M	
Description/Comments:				

Note: See section 7.4 of SWMP for BMP reporting descriptions and requirements

STORMWATER SITE PLAN REVIEW CHECKLIST

SUBMISSION REQUIREMENTS LAND DISTURBANCE REVIEW

- Completed application form with original signature of all owners
- Narrative describing proposed work including existing site conditions, proposed work, and methods to mitigate stormwater impacts
- Payment of application and review fees
- One 24x36, one half size, and electronic PDF of plans including:
 - Existing features
 - Proposed work & limits of disturbance
 - Erosion & sediment controls
 - Illicit discharge compliance statement

SUBMISSION REQUIREMENTS LAND DISTURBANCE PERMIT OR HIGHER POTENTIAL POLLUTANT LOAD

- Complete application with owners signature
- List of Abutters within 300' certified by the Assessor's Office
- Narrative describing proposed work including existing site conditions, proposed work, and methods to mitigate stormwater impacts
- Generic legal ad (in Word format) soliciting public comments with instructions
- Payment of application and review fees
- One (1) copy of each application form and the list of abutters filed with the Town Clerk
- One 24x36, one half size, and electronic PDF of:
 - Existing features
 - Proposed work & limits of disturbance
 - Stormwater Management Plan
 - Erosion & sediment control plan (3 copies)
 - Operation & maintenance plan
 - Illicit discharge compliance statement

STORMWATER MANAGEMENT PLAN

- MassDEP Stormwater checklist with supporting calculations meeting standards
- Stamped and Signed by MA P.E.
- Identify TMDLs/ Impairments
- Soil mapping and test data
- Existing & proposed uses and conditions
- Wetland resources/proposed impervious area/aquifer protection zones/earthwork within 4' of seasonal high groundwater
- Drain pipes/catch basins/easements
- LID/BMP techniques
- No adverse downgradient impacts

EROSION & SEDIMENT CONTROL PLAN

- Minimize/phase clearing
- Perimeter barrier controls
- Slope controls as necessary
- Stone construction entrance
- Stockpile areas
- Protection of infiltration basins/systems
- Catch basin protection
- List of easements
- SWPPP if > 1 acres

OPERATION & MAINTENANCE PLAN

- Follows MassDEP Stormwater checklist & standard

PERFORMANCE & DESIGN STANDARDS

- 1" (.8" Redevelopment) runoff retained and/or;
- 90% (80% Redevelopment) TSS removal
- 60% (50% Redevelopment) Phosphorus removal
- Offsite Mitigation (if necessary)
- Hydraulic calculations TR-55 and TR-20
- 24 hour rainfall from NRCS
- Drain pipes to accommodate 25 year storm
- Pipe velocities 3-10 ft/sec
- Culverts 50-year storm
- Deep sump/offline catch basins
- Stormwater basins to accommodate 100 year storm w/ 1' freeboard
- Swale velocities < 5fps
- Access for maintenance
- Minimize area of disturbance

MCM 6: GOOD HOUSEKEEPING - CATCH BASIN CLEANING

Purpose

The purpose of this this procedure to optimize routine inspections, cleaning and maintenance of catch basins with a goal that the frequency of routine cleaning will ensure that no catch basin at any time will be more than 50 percent full.

According to the Permit an excessive sediment or debris loading is a catch basin sump more than 50 percent full. A catch basin sump is more than 50 percent full if the contents within the sump exceed one half the distance between the bottom interior of the catch basin to the invert of the deepest outlet of the catch basin.

Procedure:

As part of routine inspections/cleaning events, debris levels in catch basins will be recorded if the basin is found to be more than 50% full– See tracking form on page 2.

Records from consecutive inspections/cleaning events will be compared to identify basins that may need to be cleaned more or less frequently than once per year.

Inspection and maintenance for catch basins located near construction activities (roadway construction, residential, commercial, or industrial development or redevelopment) will be prioritized. Clean catch basins in such areas more frequently if inspection and maintenance activities indicate excessive sediment or debris loadings.

If a catch basin sump is more than 50 percent full during two consecutive cleanings the Town will investigate the contributing drainage area for sources of excessive sediment loading and address the source or clean the catch basin more frequently. Actions taken will be described in the annual report.

In cases where a catch basin inspection or cleaning reveals abnormal, non-natural discoloration or detection of petroleum and/or chemical odors, the crew performing the inspection and cleaning shall notify supervisors for proper handling of hazardous materials and the Town should implement protocols outlined in their Illicit Discharge Detection & Elimination (IDDE) Plan.

The Town will ensure proper storage of catch basin cleanings prior to disposal or reuse such that they do not discharge to receiving waters. These materials should be managed in compliance with current MassDEP policies: <http://www.mass.gov/eea/agencies/massdep/recycle/regulations/management-of-catch-basin-cleanings.html>

Record Keeping

The Town keeps records of catch basin cleaning performed and report annually as follows:

CATCH BASIN CLEANING LOG

Reporting Period: _____ – _____

Date Range	Location(s)	# CBs Cleaned	Volume of Cleaning

MCM 6: GOOD HOUSEKEEPING - STREET AND PARKING LOT SWEEPING

Purpose

The purpose of this procedure is to ensure that all municipal streets and parking lots are swept in accordance with Permit conditions.

Procedure

All streets with the exception of rural uncurbed roads with no catch basins or high speed limited access highways shall be swept and/or cleaned a minimum of once per year in the spring (following winter activities such as sanding). Sweeping frequency is to be increased as necessary to target areas with potential for high pollutant loads for solids, oil and grease, and metals.

The Town of Hull does not have nutrient-impaired waters and therefore is required to sweep all municipal streets and lots the minimum once per year in the spring (following winter activities such as sanding).

The Town will ensure proper storage of street sweepings prior to disposal or reuse such that they do not discharge to receiving waters. These materials should be managed in compliance with current MassDEP policies:

<http://www.mass.gov/eea/agencies/massdep/recycle/regulations/management-of-catch-basin-cleanings.html>

Record Keeping

The Town keeps records of sweeping performed and reports annually as follows:

Date Range	Area	Volume of Cleaning	# lots

MCM 6: GOOD HOUSEKEEPING - WINTER ROAD MAINTENANCE PROCEDURE

Purpose

The purpose of this policy is to provide information to meet MS4 Permit requirements on the procedures followed by the Department of Public Works (DPW) during any snow or ice event throughout the winter season on approximately 55 miles of Town owned roads. The DPW reserves the right to modify any plan as needed to adjust to various circumstances that a storm might present and provides detailed winter road maintenance and snowstorm procedures on their website. The DPW Director will be responsible for carrying out this policy to satisfy the Permit. Parking during snow removal shall comply with Town By-Laws and as referenced on the Snow and Ice Policy on the DPW website.

Priorities

1. The first priority is to ensure that police, fire and medical emergency equipment can move safely on streets.
2. The second priority is to open main and secondary roads for use by the public.
3. The third priority is to open residential streets.
4. The fourth priority is to open all schools, public facilities, and clear sidewalks used to walk to schools/businesses/public transportation.

Materials Used

With safety as the priority, the Town's goal is to minimize the use of salt and sand through optimization of application. This is achieved through the use, where practicable, of automated application equipment, anti-icing and pre-wetting techniques, implementation of pavement management systems, and alternate chemicals. The types of materials used by the Department of Public Works are detailed below.

- Rock Salt (Sodium Chloride): Salt is used to expedite the melting of snow and ice from the street surface and also to keep the ice from forming a bond to the street surface.
- Sand: Sand is used as an abrasive for traction on slick roadways.
- Other Materials: The Town may choose to use alternative chloride-containing materials used to treat paved surfaces for deicing, including sodium chloride, calcium chloride, magnesium chloride, and brine solutions.

Materials Storage

All salt, sand and deicing compounds are properly stored under cover to ensure they are not exposed to precipitation or otherwise carried to a catch basin, resource area or waterbodies. Diversion berms and good housekeeping practices shall be used to minimize runoff from storage areas.

Application and Equipment Calibration

Each piece of application equipment owned by the Town is calibrated prior to the winter season. Salt application shall be calibrated to dispense at minimum rates while maintaining safety rates (EPA guidance recommends 200 pounds per mile lane). Trucks equipped with pre-wetting brine tanks are calibrated to dispense at minimum rates while maintaining safety rates (EPA guidance recommends 8 gallons of pre-wet liquid to 1 ton of salt, to be varied based on temperature).

Snow Disposal

The MS4 Permit prohibits snow disposal into waters of the United States. Snow disposal activities, including selection of appropriate snow disposal sites, will adhere to the Massachusetts Department of Environmental Protection Snow Disposal Guidance, Guideline No. BWR G2015-01 (Effective Date: December 21, 2015).

Record Keeping

The Town maintains records of prioritized plow routes, miles of roads plowed annually, the quantity of salt and other materials used annually, and equipment calibration records.

MCM 6: GOOD HOUSEKEEPING - STORMWATER TREATMENT STRUCTURES INSPECTION & MAINTENANCE

Purpose

The following establishes inspection and maintenance frequencies and actions for permittee-owned stormwater treatment structures (excluding catch basins) which shall be inspected annually at a minimum.

Procedure

BMP Description	Required Action
Water Quality Unit (Oil/Grit Separator)	Remove accumulated oils, grease and sediments
Proprietary Separator	Inspect and clean units according to manufacturers' recommendations
	Remove sediments & debris
Leaching Catch Basin	Remove sediments & debris
	Rehabilitate the basin if it fails due to clogging
Bio-retention Areas & Rain Garden	Remove sediments & debris
	Mow and/or mulch
	Replace vegetation if needed
	Remove Invasive species as needed
Extended Dry Detention Basin	Inspect outlets
	Mow upper stage, sides slopes, embankment & spillway
	Remove trash and debris
	Remove sediments from basin
Water Quality Swale	Make sure vegetation is adequate and slopes are not eroding, check for rilling and gullyng, ponding and sedimentation
	Mow 3"-6"
	Remove sediments & debris
	Repair eroded areas if needed
	Re-seed as necessary
Infiltration Basin	Inspection for settlement, erosion, tree growth on embankments, condition of riprap and turf, ponding and sedimentation
	Mow the buffer area, side slopes, and basin bottom if grassed floor
	Inspect and clean pretreatment devices associated with the basin
	Remove sediments & debris
Infiltration Trench	Inspect the trench 24 hours or several days after a rain event
	Mow top of trench if is grassed
	Inspect and clean pretreatment BMPs, check inlets and outlets for clogging
	Remove sediments & debris
Infiltration Chamber	Inspect Inlets
	Remove sediment from pretreatment BMPs
	Remove sediments & debris
Porous Pavement	Vacuum sweep or Power wash surface

Record Keeping

Inspection and maintenance of municipal stormwater structures will be recorded using the Stormwater BMP Inspection Form (attached). The Town will keep a log of inspections and report on the condition and maintenance performed in each annual report as follows:

STORMWATER TREATMENT STRUCTURE (BMP) INSPECTION LOG

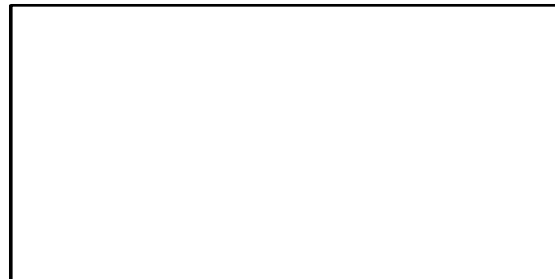
Reporting Period: _____ - _____

Report #	Date	Inspector	BMP/Location	Status & Comments

STORMWATER BMP INSPECTION FORM – SURFACE STRUCTURES

BMP ID:						
Location:			Length	±ft.	Depth	±ft.
Description:			Top Width	±ft.	Bot Width	±ft.
Type:	<input type="checkbox"/> Detention	<input type="checkbox"/> Retention	<input type="checkbox"/> Infiltration	<input type="checkbox"/> Bioretention		
	<input type="checkbox"/> Swale	<input type="checkbox"/> Infiltration Trench	<input type="checkbox"/> Other			
Inspector:				Date:		
Recent Rainfall:						
Notes:						

LOCATION MAP



MAINTENANCE REQUIRED: YES NO

(Inspect for all problems listed – provide information for required maintenance only)

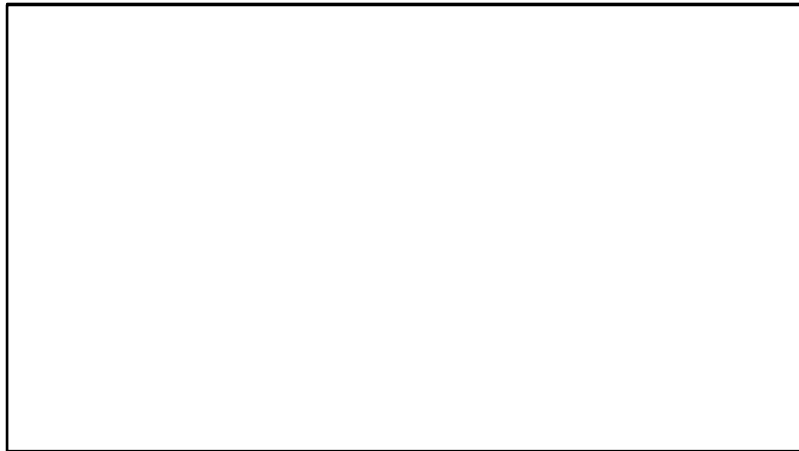
Problem	Description	Quantity (±)	Completed (personnel)	Date
<input type="checkbox"/> Sediment/Debris			<input type="checkbox"/>	
<input type="checkbox"/> Vegetation			<input type="checkbox"/>	
<input type="checkbox"/> Erosion			<input type="checkbox"/>	
<input type="checkbox"/> Water Pond			<input type="checkbox"/>	
<input type="checkbox"/> Sediment Forebay			<input type="checkbox"/>	
<input type="checkbox"/> Outlet Struct			<input type="checkbox"/>	
<input type="checkbox"/> Inlet			<input type="checkbox"/>	
<input type="checkbox"/> Outlet			<input type="checkbox"/>	
<input type="checkbox"/> Riprap			<input type="checkbox"/>	
<input type="checkbox"/> Check Dam			<input type="checkbox"/>	
<input type="checkbox"/> Access			<input type="checkbox"/>	
<input type="checkbox"/> Fence			<input type="checkbox"/>	
<input type="checkbox"/> Other			<input type="checkbox"/>	

BMP PHOTOS

STORMWATER BMP INSPECTION FORM – SUBSURFACE STRUCTURES

BMP ID:					
Location:		Cover/Grate size	±ft.	Cover/Grate shape	±ft.
Description:		Structure Diameter	±ft.	Depth	±ft.
		Structure Material			
Type:	<input type="checkbox"/> Oil-Grit Separator	<input type="checkbox"/> Proprietary Structure	<input type="checkbox"/> Leaching CB		
	<input type="checkbox"/> Infiltration Chamber/Pipe	<input type="checkbox"/> Sand Filter	<input type="checkbox"/> Other		
Inspector:				Date:	
Recent Rainfall:					
Add. Info:					

LOCATION MAP



MAINTENANCE REQUIRED: YES NO

(Inspect for all problems listed – provide information for required maintenance only)

Problem	Description	Quantity (±)	Completed (personnel)	Date
<input type="checkbox"/> Grate/Cover			<input type="checkbox"/>	
<input type="checkbox"/> Structure			<input type="checkbox"/>	
<input type="checkbox"/> Hood/Trap/Insert			<input type="checkbox"/>	
<input type="checkbox"/> Pipes & Joints			<input type="checkbox"/>	
<input type="checkbox"/> Ladder			<input type="checkbox"/>	
<input type="checkbox"/> Sediment/Debris			<input type="checkbox"/>	
<input type="checkbox"/> Vegetation/Roots			<input type="checkbox"/>	
<input type="checkbox"/> Contaminants/Pollution			<input type="checkbox"/>	
<input type="checkbox"/> Infiltration Capability			<input type="checkbox"/>	
<input type="checkbox"/> Discharge			<input type="checkbox"/>	
<input type="checkbox"/> Fence			<input type="checkbox"/>	
<input type="checkbox"/> Access			<input type="checkbox"/>	
<input type="checkbox"/> Other			<input type="checkbox"/>	

BMP PHOTOS

APPENDIX C

- **Delegation of Authority Letter**



TOWN OF HULL
Town Manager's Office

253 Atlantic Avenue
Hull, Massachusetts 02045

781-925-2000
Fax: 781-925-0224

June 21, 2021

MEMO TO FILE

Re: Documentation for delegation of "Authorized Representative" for NPDES 2016
Massachusetts Small Municipal Separate Storm Sewer System (MS4) General Permit

This document serves to affirm that Christopher Gardner, Director of the Department of Public Works has the responsibility for the operation of the MS4 Plan and is hereby designated as an authorized person for signing all reports including but not limited to the Stormwater Management Plan (SWMP), Stormwater Pollution Prevention Plans (SWPPPs), inspection reports, annual reports, monitoring reports, reports on training, and other information required by the General Permit for Stormwater Discharges from Small Municipal Separate Storm Sewer Systems (MS4) in Massachusetts for the Town of Hull. This authorization cannot be used for signing a NPDES permit application (e.g., Notice of Intent (NOI)) in accordance with 40 CFR 122.22).

By signing this authorization, I confirm that I meet the following requirements to make such a designation as set forth in Part B.11 of Appendix B of the Small MS4 General Permit:

For a municipality, state, federal, or other public agency: By either a principal executive officer or ranking elected official.

"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."

Philip E. Lemnios
Town Manager

June 21, 2021

Date