

Stormwater Management Plan (SWMP) Revision History

MS4 Materials that supplement the 2019 SWMP Document

<u>Revision #</u>	<u>Date</u>	<u>Comments</u>
0	6/2019	SWMP Published for Town Comment
1	9/2020	IDDE Plan and SWPPPs are included as Appendix K
2	9/2021	Year 3 Updates
3	9/2022	Year 4 Updates
4	9/2023	Year 5 Updates
5	7/2024	Year 6 Updates
6	6/2025	Year 7 Updates

"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."

Printed Name _____

Signature _____ Date _____





CERTIFICATION

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

Printed Name _____

Signature _____ Date _____

Stormwater Management Plan (SWMP)

June 2019
Updated: June 2025

PREPARED FOR:

Town of Stoughton
10 Pearl Street
Stoughton, MA 02072



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Section 1 Background

Section 1.1 Stormwater Regulation

The Stormwater Phase II Final Rule was promulgated in 1999 and was the next step after the 1987 Phase I Rule in an effort by the Environmental Protection Agency (EPA) to preserve, protect, and improve the Nation's water resources from polluted stormwater runoff. The Phase II Rule expands the Phase I program by requiring additional programs and practices to control polluted stormwater runoff from small Municipal Separate Storm Sewer Systems (MS4s) in urbanized areas and construction sites, through the use of National Pollution Discharge Elimination System (NPDES) permits. 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 U.S. Census-designated Urbanized Area are required to seek NPDES permit coverage for those stormwater discharges.

Section 1.2 Permit Program Background

On May 1, 2003, EPA Region 1 issued its Final General Permit for Stormwater Discharges from Small Municipal Separate Storm Sewer Systems (2003 small MS4 Permit) consistent with the Phase II Rule. The 2003 small MS4 Permit covered "traditional" (e.g., cities and towns) and "non-traditional" (e.g., 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 small MS4 General Permit, which became effective on July 1, 2018:

Section 1.3 Stormwater Management Plan (SWMP)

The SWMP describes and details the activities and measures that will be implemented to meet the terms and conditions of the 2016 MS4 Permit. The SWMP accurately describes the permittees' plans and activities. The document should be updated and/or modified during the Permit term as the permittee's activities are modified, changed or updated to meet permit conditions. Additionally, MS4 reports (Operations and Maintenance Plan, Illicit Discharge Detection and Elimination Plan, etc.), annual reports, and inspection reports should be attached to the SWMP as appendices. Thus, the SWMP should act as a living document that records the permittee's planned and complete progress toward meeting the MS4 Permit requirements.

The main elements, or minimum control measures (MCMs) of the stormwater management program are:

1. Public education program in order to affect public behavior causing stormwater pollution,
2. Opportunity for the public to participate and provide comments on the stormwater program
3. Program to effectively find and eliminate illicit discharges within the MS4
4. Program to effectively control construction site stormwater discharges to the MS4
5. Program to ensure that stormwater from development projects entering the MS4 is adequately controlled by the construction of stormwater controls, and
6. Good housekeeping program to ensure that stormwater pollution sources on municipal properties and from municipal operations are minimized.

The hyperlinks provided in **Appendix A** offer additional information and supporting documents related to the MS4 Permit and the minimum control measures.

Section 1.4 Town Specific MS4 Background

The Town must give special consideration to and meet eligibility requirements for their discharges to be able to apply for coverage under the General Permit. Eligibility will be determined based on three categories: Endangered Species Act, National Historic Preservation Act, and Water Quality Impaired Waters. The Town must establish that discharges from its storm drain system do not adversely impact endangered species, critical habitats, and historic properties to be covered by the General Permit.

Furthermore, the Town must identify all receiving waters that have been classified as Water Quality Impaired Waters by the Massachusetts Department of Environmental Protection (MassDEP). The Town of Stoughton and its surrounding water bodies are shown in **Figure 1: System Locus** and the MS4 Urbanized Area and Impaired Waters within the Town of Stoughton is shown in **Figure 2: MS4 Urbanized Area**.

The Notice of Intent (NOI) for coverage under the Small MS4 General Permit was submitted to EPA and MassDEP on September 27, 2018. A copy of the NOI is provided in **Appendix B**.

Section 2 SWMP Components

Section 2.1 Parties Involved in Implementation

The Town has not yet created/staffed a stormwater management position. Alternatively, the Town has established a Stormwater Committee. The members of the Stoughton stormwater committee are listed in the table below. This committee has prioritized detailed goals and concerns regarding implementing of a stormwater program.

Table 1: List of Parties Responsible for SWMP Implementation

Name	Title	Department
Marc J. Tisdelle	Town Engineer	Engineering Department
Laurence W. Langlois	GIS Manager/Stormwater Coordinator	Engineering Department
Paul Giffune	Director of Public Works	Public Works Department (DPW)
Craig A. Horsfall	Assistant Town Engineer	Engineering Department
William D. Roth	Town Planner	Planning Board
Jack Erickson	Building Commissioner	Building Department
Lawrence Perry	Town Sanitarian	Board of Health
Dennis Rego	Schools Facilities Manager	School Committee

A schedule has been developed in effort to comply with the NPDES Permit requirement and timelines as currently established. The schedule is attached as **Appendix C**.

Section 2.2 Documentation Regarding Endangered Species

To comply with part 1.9.1 of the NPDES Permit, the Town has attached documentation in **Appendix D** supporting Stoughton's eligibility determination of Criterion C regarding federal Endangered and Threatened Species and Critical Habitat Protection. Criterion C states that, "determination is made by EPA, or by the applicant and affirmed by EPA, that the stormwater discharges and discharge related activities will have "no effect" on any federally threatened or endangered listed species or designated critical habitat under the jurisdiction of the USFWS." In this case, USFWS provided a letter in place of a concurrence letter for informal consultation.

The attachments in **Appendix D** include the aforementioned letter, as well as the results of the Information for Planning and Consultation (IPaC) environmental review process. Using the IPaC environmental review process, one endangered species has been identified within Stoughton's boundaries: the Northern Long-Eared Bat. This species does not have critical habitats designated within the Town, and the MS4 Permit will not adversely affect the listed species within the MS4 area.

Section 2.3 Documentation Regarding Historic Properties

The Town has attached documentation in **Appendix E** supporting their eligibility determination regarding Historic Properties, in compliance with part 1.9.2 of the Permit. This document, Appendix D of the Massachusetts General MS4 Permit, includes information supporting Stoughton's determination as Criterion A, stating that the discharges do not have the potential to cause effects on historic properties.

Historic site considerations will be evaluated further as part of the design/permitting of new/retrofit stormwater control measures (SCMs), proposed for implementation as part of MS4 compliance. Regarding the National Historic Preservation Act, under 36 CFR 800, this facility is an existing facility authorized by the previous Permit and is not undertaking any activity involving subsurface land disturbance less than one (1) acre. This MS4 Permit will have "no potential to cause effects," in accordance with 36 CFR 800.3(a)(1).

Section 2.4 Documentation Regarding Discharges

Attached in **Appendix F** is the documentation for tracking any new or increased discharges granted by MassDEP in compliance with part 2.1.2 of the Permit. Increased discharges refer to increased pollutant loading(s) through the MS4 to waters of the US or to impaired waters listed in categories 5 or 4b on the Massachusetts Integrated Report of waters, pursuant to the Clean Water Act. The Permit states that “any authorization of an increased discharge by MassDEP shall be incorporated into the permittee’s SWMP.”

Currently, the Town of Stoughton has no new and/or increased discharges. Stoughton will document any new and/or increased discharges, including any newly located outfall beyond what was listed in the NOI, any newly constructed outfall, or any new development increasing flow to existing MS4 outfall structures. These discharges will be documented on the form provided in **Appendix F** and will include project specific information regarding the best management practices implemented for those discharges. A sample discharges form is provided in **Appendix F**.

Section 2.5 Sanitary Sewer Overflow (SSO) Inventory

In the event of an overflow or bypass, a notification must be reported within 24 hours by phone to MassDEP, EPA, and other relevant parties. The verbal notification should be followed up with a written report following MassDEP's Sanitary Sewer Overflow (SSO)/Bypass notification form within five calendar days of the time you become aware of the overflow, bypass, or backup. Upon notification of any SSO or septic overflow, the Stoughton Board of Health will take these appropriate measures to comply with Permit requirements.

The Town will maintain an inventory of all known locations where SSOs have discharged to the MS4, if any are found. This inventory shall include SSOs resulting from inadequate conveyance capacities, or where interconnectivity of the storm and sanitary sewer infrastructure allows for connection of flow between the systems. A SSO inventory form is provided in **Appendix G** and is updated annually. The inventory includes the following information:

1. Location (approximate street crossing/address and receiving water, if any);
2. A clear statement of whether the discharge entered a surface water directly or entered the MS4;
3. Date(s) and time(s) of each known SSO occurrence (i.e., beginning and end of any known discharge);
4. Estimated volume(s) of the occurrence;
5. Description of the occurrence indicating known or suspected cause(s);
6. Mitigation and corrective measures completed with dates implemented; and
7. Mitigation and corrective measures planned with implementation schedules.

Section 2.6 IDDE Program and Bylaws

The Town’s IDDE plan was developed during the first year of the new MS4 Permit (June 2019). The IDDE program is detailed in **Section 3.3 of Minimum Control Measures**. The Town of Stoughton has adopted Chapter 159: Stormwater Management Bylaw (adopted at 2021 Annual Town Meeting) and Rules and Regulations for Stormwater Management (approved by Select Board on October 19, 2021). A copy of the Stormwater Management Bylaw and Rules and Regulations for Stormwater Management is provided in **Appendix H**.

Section 2.7 Sediment and Erosion Control Procedures

Written procedures for the Town’s site inspections and enforcement of sediment and erosion control procedures in accordance with part 2.3.5 of the MS4 Permit, Construction Site Stormwater Runoff Control, are detailed in the **Sections 3.4 and 3.5, Minimum Control Measures**. This information includes the party responsible for site inspections and implementation of procedures.

Section 2.8 Public Drinking Water Supply Sources Protection

The Town has developed practices to avoid or minimize impacts to surface public drinking water supply sources. These efforts are detailed in **Minimum Control Measures Section 3.6, Good Housekeeping and Pollution Prevention**. The Town plans to prioritize the enforcement of the existing stormwater pollution prevention plans.

Section 2.9 Activities to Monitor Discharges

The Town identified discharges within public drinking water supply source areas and gave priority to outfall inspections and screening required of the Minimum Control Measures in **Section 3.0**.

Section 2.10 Annual Program Evaluation

To comply with part 4.1 of the MS4 Permit, the Town annually self-evaluates compliance with the terms and conditions of the MS4 Permit and submits each self-evaluation as part of the Fiscal Year annual report. The NPDES Phase II Small MS4 General Permit Annual Reports for Fiscal Year 2018 through the most recent Fiscal Year are attached in **Appendix I**.

Section 3 Minimum Control Measures

In an effort to reduce pollutants and comply with part 2.3 of the MS4 Permit, the Town focuses on the following six (6) minimum control measures detailed in this section. These sections describe the Town's practices to comply with each control measure, the responsible person(s) or party of each practice, and the goal(s) for each best management practice (BMP) of each control measure. The BMPs for each of the six (6) minimum control measures are outlined in the forms provided in **Appendix J**.

Section 3.1 Public Education and Outreach

The Town implemented an education program that includes educational goals based on stormwater issues of significance within the MS4 area. The ultimate objective of a public education program, MS4 Permit part 2.3.2, is to increase knowledge and change behavior of the public so that the pollutants in stormwater are reduced.

The Town implemented a public education program as required by the 2003 permit and continued that program with the necessary adjustments to meet the additional requirements of the 2016 MS4 Permit.

The program includes the education of the following four (4) audiences:

1. Residents,
2. Businesses, Institutions (Churches, Hospitals), and Commercial Facilities,
3. Developers (Construction), and
4. Industrial Facilities

Section 3.1.1 Background

The Town has made efforts to incorporate stormwater information into classroom education in Middle and High Schools through presentations by the Engineering Department. During these presentations and seminars, materials are distributed to raise awareness of stormwater issues and maintenance practices. The Engineering Department has also developed a stormwater video called "After the Storm" which has aired on local access television. The DPW works to stencil catch basins and check and re-paint them as necessary while inspecting overall conditions of the catch basins in town. Signs and posters have also been displayed with outreach material written specifically for different types of audiences, including "No-Dumping" signs in all major watershed areas. On Earth Day, the Conservation Commission gives educational presentations to generate public awareness for preventing non-point source pollution in the watershed. The Conservation Commission also works to educate the public on the stormwater benefits of rain barrels and compost generators for storing roof runoff and reducing the volume of solid waste.

Stoughton continues to participate in the Neponset Stormwater Partnership, through which the Town has been able to provide design and survey for stormwater improvements. The Public Works and Engineering Departments also attend multiple stormwater presentations on an annual basis to educate the staff on the MS4 permit requirements. The Town Engineering Department also worked to create an aquifer protection map and educate staff on low impact design of new developments. The Town will present the stormwater bylaw for public review at a future Town Meeting to make revisions and updates for the new permit requirements.

Section 3.1.2 Best Management Practices

- I. Distribution of a minimum of two (2) educational messages over the permit term to the required audiences within the permit term (five (5) years), as listed below.
 - a. Residents
 - i. Maintain stormwater website with hyperlinks to stormwater related bylaws.
 1. <https://www.stoughton.org/506/Stormwater-Information>
 - ii. Keep outreach materials at Library and Town Hall and publish them on the stormwater website, utilizing materials from the MassDEP, EPA, and relevant stormwater collaborative.
 - iii. Consider creating a Town Resident Notification System for stormwater alerts.
 - iv. Distribute New Resident packets to residents within Wetland Protection Areas.

- v. Distribute pet waste control information to residents when they (re)apply for a pet license.
- vi. Install educational boards/signs in parks, public open space, near wetlands, etc.
- vii. Continue to perform presentations and provide school materials to Stoughton High School and O'Donnell Middle School.
- b. Businesses, Institutions, and Commercial Facilities
 - i. Include stormwater information in permit materials and make it available on stormwater website and at Town Hall.
 - ii. Make information available on the stormwater website and at Town Hall.
 - iii. Distribute information to septic maintenance contractors.
- c. Developers (Construction)
 - i. Include stormwater information materials as appendix to building and site plan review permit applications.
 - ii. Make information available on the stormwater website and at Town Hall.
 - iii. Distribute information to septic maintenance contractors.
- d. Industrial Facilities
 - i. Distribute stormwater information to industrial groups based on zoning and property use.
 - ii. Make information available on the stormwater website and at Town Hall.

Section 3.2 Public Involvement and Participation

The objective of the public involvement and participation control measure, MS4 Permit part 2.3.3., is for the Town to provide the public with opportunities to engage in activities that promote good stormwater practices. The public has also been given the chance to review the SWMP and its implementation.

Section 3.2.1 Background

Stoughton has created a Stormwater Committee to identify and develop plans to mitigate stormwater problem areas in town. The Town holds a household hazardous waste day each year and provides opportunities for residents to dispose of unwanted prescriptions to protect the environment. The Ames Pond Citizens Committee and Harris Pond Citizen Committee were formed to increase awareness of the nutrient problems in these ponds and mitigate these nutrient pollutions. The Board of Health has made efforts to educate the public on preventing groundwater contamination by maintenance of on-site sewage disposal. In addition, the Board of Health has developed programs for removing mercury from the municipal solid waste stream and implementing a program to replace failed septic systems.

The Neponset Stormwater Partnership as well as the Taunton River Watershed both host various events throughout the year for the benefit of the residents.

Section 3.2.2 Best Management Practices

- I. Public Review
 - a. Stormwater Management Plan Review (SWMP)
 - i. Make SWMP available at least annually for public review.
 - ii. Create and use Stormwater Website to publish SWMP and annual reports. The website should contain a space for electronically soliciting public comments (e.g. stormwater specific e-mail, message board, etc.)
 - 1. Stormwater website is located at the following link:
<https://www.stoughton.org/506/Stormwater-Information>
 - 2. Make physical copies available at Town Hall, Library, DPW, etc.

II. Public Participation

- a. Participate in local stormwater groups/associations (e.g. Neponset River Watershed Association, Harris Pond Citizen Committee, Ames Pond Citizens Committee).
- b. Maintain/Acquire membership with local stormwater/water quality committees (e.g. Stormwater Advisory Committee).
- c. Continue to host hazardous waste collection days.
- d. Continue to hold Town clean-up days with various groups.
- e. Stormwater Hotline
 - i. Establish a stormwater hotline and publish contact information on the stormwater website to solicit complaints, questions, etc.

Section 3.3 Illicit Discharge Detection and Elimination (IDDE) Program

The Town has implemented an IDDE program, per MS4 Permit part 2.3.4, to find and eliminate non-stormwater discharge sources. Procedures have been implemented to fix any prevalent issues in the Town's storm sewer system. There are 152 outfall structures that discharge to the Town of Stoughton's MS4 area. The Town's inventory of outfall structures is shown in **Figure 3: Stormwater System**. Below, **Table 2** lists the Town's impaired waters, the impairments per water body, and any associated final Total Maximum Daily Load (TMDL) report numbers. Impairments will be discussed further in **Section 4**.

Table 2: Impaired Waters, TMDLs and Impairments

Water Body Name	Segment ID	Category	Impairment(s)	Associated Approved TMDL
Farrington Pond	MA73040	4c	• Non-Native Aquatic Plants*	
Glen Echo Pond	MA73022	4c	• Non-Native Aquatic Plants*	
Pinewood Pond	MA73039	4c	• Non-Native Aquatic Plants* • Aquatic Plants (Macrophytes)*	
Town Pond	MA73056	4c	• Fanwort*	
Woods Pond	MA73055	4c	• Non-Native Aquatic Plants*	
Ames Long Pond	MA62001	5	• Non-Native Aquatic Plants* • Aquatic Plants (Macrophytes)* • Turbidity • Fanwort* • Nutrient/Eutrophication Biological Indicators*	
Beaver Meadow Brook	MA73-20	5	• Oxygen, Dissolved • Escherichia coli (E. coli)	2592
Steep Hill Brook	MA73-18	5	• Escherichia coli (E. coli)	
Unnamed Tributary	MA73-32	5	• Benthic Macroinvertebrates • Escherichia coli (E. coli)	54860

Category 4c Waters – impaired water bodies where the impairment is not caused by a pollutant. No TMDL required.

Category 5 Waters – impaired water bodies that require a TMDL.

"Approved TMDLs" are those that have been approved by EPA as of the date of issuance of the Massachusetts 2018/2020 List of Integrated Waters (February 2022).

*TMDL not required (non-pollutant)

Section 3.3.1 Background

The Town has made extensive efforts towards illicit discharge detection and elimination. Phase I stormwater mapping of existing drain facilities in Town has been completed, along with inspections on drainage structures and verification of connectivity. GIS software for this stormwater mapping data has been developed and maintained by the Town's GIS Administrator. This system has streamlined the DPW's work for closed circuit television (CCTV) inspections of areas with suspect water quality. The GIS inspection data has also provided information on outfall dry weather flow, which was important in developing the outfall sampling program. All MS4 outfalls have been identified.

An IDDE bylaw for field inspections of utility tie-ins was developed and approved, and continues to be enforced by the Engineering Department, Board of Health, and DPW. The Board of Health has made ongoing efforts to eliminate illicit discharges including the enforcement of Public and Semi-Public swimming pool back wash discharge regulations, enforcement of the commercial and industrial hazardous waste floor drain regulations, and enforcement of the hazardous waste groundwater protection bylaw. There are several stormwater improvement design projects in progress, including the Park Street sewer extension, DPW facility drainage improvements, and curb and berm installation on Canton Street. The DPW also performs stormwater infrastructure replacements or repairs as needed. In 2017 – 2018, the Town continued with the Neponset Stormwater Partnership and provided in-house survey and design as part of the awarded 319 Stormwater Grant through the Neponset River Valley Association for stormwater improvements at Gibbons Elementary School. Additionally, the Town was awarded a MassDEP Stormwater Grant for 30% Stormwater Improvement Design Plans for three (3) sites in Stoughton (Dawes School, Hansen School, and Central/West Street intersection).

A hydraulic study of the sanitary sewer system and inspections of land that is subject to flooding has been in progress by the Engineering Department and will continue to be an ongoing effort. IDDE bylaw revisions were presented and approved at the 2021 Town Meeting to meet the requirements of the new permit.

Section 3.3.2 Best Management Practices

I. Legal Authority

- a. The IDDE program shall include adequate legal authority to prohibit illicit discharges; investigate suspected illicit discharges; eliminate illicit discharges, including discharges from properties not owned by or controlled by the MS4 that discharge into the MS4 system; and implement appropriate enforcement procedures and actions. Adequate legal authority consists of a currently effective ordinance, bylaw, or other regulatory mechanism. This ordinance, bylaw, or other regulatory mechanism was a requirement of the MS4-2003 permit and was required to be effective by May 1, 2008. The Town updated Chapter 159: Stormwater Management Bylaw in 2021.

II. SSO Inventory

- a. Develop SSO Inventory Database within one year of effective permit date that logs historical SSOs that have occurred in the last five (5) years, as discussed in further detail in **Section 2.5**.

The inventory has been developed and is updated annually.

- i. Coordinate with the DPW for tracking of any future septic or SSOs.

III. Storm Sewer System Map

- a. Update map within two (2) years of effective date of the Permit and complete full system map 10 years after effective date of permit. **Year 2 (Phase I) mapping updates are complete.**
 - i. Make an electronic and physical copy of the map available to the public via the stormwater website and Town Hall.
 - ii. Map/verify 10% of system per year during Permit Years 1-10.
 1. Phase I will be focused on during Years 1 and 2, while Phase II will be focused on during Years 3 through 10.
 - iii. Integrate system map updates with planned utility expansion projects.
 - iv. Cross reference drainage information to ensure mapping is as accurate as possible.
 - v. Map/verify country drainage (e.g. scuppers), in addition to outfall pipes.

IV. Written IDDE Program Development

- a. Develop and complete a written IDDE program within one (1) year of effective permit date. **The IDDE program and permit attachments are complete. The most updated IDDE Plan is attached to this document as Appendix K and is available within the Town Hall at 10 Pearl Street, Stoughton, MA 02072.**
 - i. The written plan includes but is not limited to the following:
 1. Outline of responsibilities,
 2. Storm sewer map with locations of known outfalls, including information on relevant connectivity data gaps,
 3. Systematic procedure/protocol to detect and eliminate illicit discharges,
 4. Assessment/ranking of catchments (based on complaints, past water quality data, adjacent failing septic/sewer systems, surrounding area, TMDL surface waters), and
 5. Tracking mechanism to evaluate and report on the overall effectiveness of the IDDE program.

V. Implement IDDE Program

- a. Implement catchment investigations according to program and permit conditions within 15 months of the effective date of the Permit. **Catchment investigations procedures have been written and included in the Town's IDDE Plan.**
 - i. Continue to enforce bylaw.
 - ii. Draft and implement stormwater management regulations. **These regulations have been drafted.**
 - iii. Coordinate water quality monitoring with dry weather screening.
 1. The new monitoring system should include surveying for illicit discharge detection.

VI. Employee Training

- a. Coordinate annual stormwater training and incorporate with training required in Section 6.2.IV.B of the MS4 Permit. **Regular annual training has been provided to the Town.**

VII. Dry Weather Screening

- a. Conduct screening in accordance with the outfall screening procedure and permit conditions. **Dry weather screenings were completed in 2020.**

VIII. Conduct Wet Weather Screening

- a. Conduct screening in accordance with outfall screening procedure and permit conditions, and as determined by dry weather screening results, within ten years of effective permit date. **Wet weather screening has started and is ongoing.**
- b. To identify areas with higher potential for illicit connections, the permittee shall identify the presence of any of the following System Vulnerability Factors (SVFs):
 - i. History of SSOs, including, but not limited to, those resulting from wet weather, high water table, or fat/oil/grease blockages;
 - ii. Common or twin-invert manholes serving storm and sanitary sewer alignments;
 - iii. Common trench construction serving both storm and sanitary sewer alignments;
 - iv. Crossings of storm and sanitary sewer alignments where the sanitary sewer system is shallower than the storm drain system;
 - v. Sanitary sewer alignments known or suspected to have been constructed with an underdrain system;
 - vi. Inadequate sanitary sewer level of service (LOS) resulting in regular surcharging, customer back-ups, or frequent customer complaints;
 - vii. Areas formerly served by combined sewer systems; and

- viii. Sanitary sewer infrastructure defects such as leaking service laterals, cracked, broken or offset sanitary infrastructure, directly piped connections between storm drain and sanitary sewer infrastructure, or other vulnerability factors identified through Inflow/Infiltration Analyses, Sanitary Sewer Evaluation Surveys, or other infrastructure investigations.
- IX. Conduct ongoing screening as necessary, and upon completion of the IDDE program.
- X. IDDE Regulations
 - a. Continue to eliminate illicit discharge violations.

Section 3.4 Construction Site Stormwater Runoff Control

The Town must implement a program focused on controlling stormwater runoff from construction sites. The program shall minimize or eliminate erosion on site and maintain the site so that the sediment is not transported in stormwater or allowed to discharge to a water of the U.S. through the Town's MS4, as stated in part 2.3.5 of the Permit.

Section 3.4.1 Background

The Town enforces submittal of Stormwater Pollution Prevention Plans for all projects greater than one acre in size, and a comprehensive review of all construction documents. For projects less than one acre in size, the Town performs a comprehensive stormwater review to ensure compliance with local and state stormwater requirements. All site development plans are required to provide proper erosion controls and comply with the MassDEP Stormwater Management Regulations. The Conservation Commission works to reduce non-point source pollution by implementing a vegetated buffer area on construction activities. To make site inspections more efficient, the Engineering Department created stormwater inspection applications to upload all inspection data to the GIS system and store that information based on the location of the inspection.

Section 3.4.2 Best Management Practices

- I. Site Inspection and Enforcement of Erosion and Sediment Control (ESC) Measures.
 - a. Complete written procedures of site inspections and enforcement procedures within one (1) year of effective date of the Permit. **These procedures have been prepared.**
 - i. Recommend standards and practices for Town inspection procedures. Seek input from relevant town groups (e.g. Conservation Commission, DPW, Building Department, etc.).
 - ii. Develop inspection forms that include ESC measures and integrate them with existing Town forms.
- II. Site Plan Review
 - a. Complete written procedures of site plan review and begin implementation within one (1) year of the effective date of the Permit. **These procedures have been prepared.**
 - i. Include site plan review workflow chart with permit applications.
 - ii. Review the current Town procedure regarding when a Construction General Permit (CGP) is needed.
 - 1. CGP is required for disturbance of one (1) acre or greater.
- III. Erosion and Sediment Control Ordinance
 - a. Adoption of requirements for construction operators to implement a sediment and erosion control program within one (1) year of the effective date of the Permit.
 - i. Require all projects with a CGP to conduct erosion and sediment control inspections as described within the Rules and Regulations for Stormwater Management.
 - ii. Update Town inspection forms with erosion and sediment control checklist.
 - iii. Continue to implement Soil and Erosion Control requirements listed in the Rules and Regulations for Stormwater Management.
 - iv. Continue to monitor all construction activities within the Town of Stoughton for erosion and sediment control issues.

IV. Waste Control

- a. Adoption of requirements to control waste, including but not limited to, discarded building materials, concrete truck wash out, chemicals, litter, and sanitary wastes within one (1) year of the effective date of the Permit.
 - i. Incorporate into the Town's general conditions for building permit and/or site plan review.
 - ii. Review and modify the Town bylaw to meet new requirements.

V. Pre-Construction/Coordination Meetings

- a. Continue GIS mapping and develop protocol for submitting as-builts electronically.

Section 3.5 Post-Construction Stormwater Management in New Development and Redevelopment

The objective of an effective post construction stormwater management program, part 2.3.6 of the Permit, 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.

Section 3.5.1 Background

The Town's Stormwater Committee drafted a revised stormwater management bylaw that was approved by the Town Meeting in 2021. The new bylaw – Chapter 259: Stormwater Management Bylaw – is consistent with the 2018 MS4 Permit and 2020 Revisions. Additionally, Rules and Regulations for Stormwater Management were drafted and adopted by the Town Council in October 2021. Each new project is now reviewed prior to construction and post-construction operation and maintenance manuals are required to be submitted prior to project approval.

In Year 4, the Town assessed local bylaws to determine the feasibility of constructing green infrastructure practices as well as the creation of impervious cover. These two (2) assessments are included in **Appendix O**. The Town has reviewed this assessment and is reviewing what follow-up steps need to be taken, including revising existing bylaws. Additionally, the Town maintains a list of five (5) permittee-owned properties to prioritize SCM retrofits. Details on the prioritization of municipal properties for SCM retrofits are included in **Appendix O**.

Section 3.5.2 Best Management Practices

I. Post-Construction Ordinance

- a. The Town shall develop or modify, as appropriate, an ordinance or other regulatory mechanism within two (2) years of the effective date of the permit. **The Town has completed this task within the two (2) years of the effective date of the permit.**

II. As-Built Plans for On-Site Stormwater Control

- a. Require submission of electronic data for as-built drawings (e.g. PDF, AutoCAD, GIS) within two (2) years of completed construction. As-built plans are required as part of the regulations.
 - i. O&M certification should include contact and contract information for contractors that perform O&M on the private SCMs.

III. Inventory and Priority Ranking of MS4-Owned Properties that may be Retrofitted with SCMs

- a. Conduct detailed inventory of MS4 owned properties and rank for retrofit potential within four (4) years of the Permit effective date. **The priority ranking has been completed and is included in Appendix L.**
 - i. Inventory Town parcels for existing stormwater SCMs and identify opportunities for GI/LID retrofits.
 - 1. Including schools, parks, recreation facilities, police/fire/EMS, libraries, public works, and town administrative offices.

- IV. Allow Green Infrastructure
 - a. Within four (4) years of the Permit effective date, develop a report assessing existing local regulations to determine the feasibility of making green infrastructure practices allowable when appropriate site conditions exist. **The assessment has been completed and is included in Appendix L.**
 - i. Review bylaws and applications to incorporate green infrastructure and low impact development language as needed.
 - ii. Educate the public on green infrastructure through existing SCM retrofits/demonstration projects.
- V. Street Design and Parking Lot Guidelines
 - a. Within four (4) years of the Permit effective date, 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. **The assessment has been completed and is included in Appendix L.**
 - i. Publish street design and parking lot guidelines on the stormwater website.
- VI. Ensure any stormwater controls or management practices for new development and redevelopment will prevent or minimize impacts to water quality. **This item was completed through the adoption of the Bylaws and Rules and Regulations.**
 - a. Within two (2) years of the Permit effective date, adopt, amend, or modify regulation mechanisms to meet permit requirements.
 - i. Review rules and regulations and modify as needed. Include evaluation of subdivision/redevelopment requirements to keep stormwater runoff onsite and for long-term operations and management of private SCMs.
 - ii. Continue to implement Post-Construction Site Runoff Control Bylaw.
 - iii. Continue to require submission of long-term O&M pollution prevention plans for all developments greater than an acre.
 - iv. Continue to enforce asbestos removal bylaw.
 - v. Continue to enforce lead paint removal bylaw.
 - vi. Continue to enforce compliance with local Conservation and Stormwater bylaws and regulations.
- VII. Monitor construction impacts on the number of impervious surfaces. **This work is ongoing.**
 - a. Record pre/post-construction changes to the impervious surface.
 - i. Require submittal of impervious area data with as-built records.
 - 1. Projects should report quantities of impervious area per and post-construction, along with the net increase/decrease of impervious area.

Section 3.6 Good Housekeeping and Pollution Prevention for Permittee Owned Properties

The objective of this control measure, part 2.3.7 of the Permit, states that the permittee shall implement an operations and maintenance program for Town-owned operations that shall focus on preventing or reducing pollutant runoff and protecting water quality from Town operations.

Section 3.6.1 Background

Catch basin cleaning, street sweeping, and swale maintenance are all performed by the DPW to reduce stormwater pollution. The DPW also ensures that all hazardous materials are stored inside, and a "no exposure" rating from EPA was obtained. To eliminate inflow and infiltration, the DPW is constantly fixing all sewer pipes with leakage issues repairing sewer piping to reduce inflow and infiltration.

The Conservation Commission requires pesticide-free landscaping practices as a special requirement in the Orders of Conditions, and the Commission also developed a Hydro-Raking Program to mitigate the extensive exotic vegetation problem at Ames Long Pond. The DPW is also in the process of formalizing operations and techniques for catch basin cleaning, street sweeping and winter road maintenance.

Section 3.6.2 Best Management Practices

- I. Create written O&M procedures for parks and open spaces, buildings and facilities, and vehicles and equipment within two (2) years of the Permit effective date. **This item has been completed.**
 - a. Develop standards of practice for the O&M of each public facility and combine in the Town O&M Manual.
- II. Maintain and update the inventory of all permittee-owned parks and open spaces, buildings and facilities (including their storm drains), and vehicles and equipment within two (2) years of the permit effective date. **This item has been completed.**
 - a. Develop a capital improvement plan that deals with flood prevention measures and water quality improvements.
 - i. Coordinate implementation with Section 5.2.II of the Permit.
- III. Establish and implement a program for repair and rehabilitation of MS4 infrastructure within two (2) years of the Permit effective date.
 - a. Inspect assets and assess conditions to develop program.
 - b. Review annual budget to set aside funding.
- IV. Stormwater Pollution Prevention Plan (SWPPP) For Maintenance Garages, Transfer Stations and Other Waste-Handling Facilities. **This item has been completed and SWPPP inspections occur quarterly.**
The quarterly SWPPP inspections can be found in Appendix M.
 - a. Develop plan within two (2) years of the Permit effective date.
 - b. Schedule annual employee training.
 - i. Continue to look into workshop and speaking opportunities and seek formal training for all departments.
 - c. Inspect facilities quarterly.
 - d. Develop an asset management system to process complaints, permits, inspections, and maintenance.
 - e. Continue to implement improved recycling standards and requirements.
- V. Catch Basin Cleaning (**ongoing annually**)
 - a. Develop and maintain an annual cleaning schedule.
 - b. Develop electronic data collection system for tracking, inspection, and maintenance.
 - i. Update catch basin cleaning services RFP requirements to require electronic data collection that is compatible with the Town's GIS and asset management system.

- VI. Street Sweeping Program (**ongoing annually**)
 - a. Continue to implement street sweeping program, sweeping streets a minimum of once annually in the spring, except in the Taunton River Watershed, where streets must be swept twice (2) yearly due to nitrogen impairment.
 - b. Include the number of miles of streets cleaned per year, and volume or mass or material removed in each annual stormwater report (rural and uncurbed exceptions apply).
- VII. Road Salt Use Optimization Program/Winter Road Maintenance (**ongoing annually**)
 - a. Continue working on salt reduction strategies.
 - i. Continue to develop and implement winter road maintenance procedures including use and storage of salt and sand.
 - ii. Continue to minimize the use of salt and ensure that snow is not disposed of in water ways.
 - iii. Calibrate spreaders to reduce salt use.
- VIII. Inspection and maintenance of stormwater treatment structures (ongoing annually)
 - a. Establish and implement inspection and maintenance procedures for annual inspection/maintenance.
- IX. Norfolk County Mosquito Control Project
 - a. Coordinate annual meetings with Control Project Staff to discuss potential stormwater impacts from mosquito control applications and potential SCM retrofits that can minimize standing water in catch basins (e.g. leaching structures).
- X. Massachusetts Department of Transportation (MassDOT)
 - a. Coordinate annual meetings with MassDOT District 5 Staff to discuss stormwater system interconnections, common receiving waters, and opportunities for collaboration.

Section 4 Water Quality Based Requirements

In compliance with the Clean Water Act (CWA), each state must administer a program to monitor and assess the quality of its surface and groundwater. Section 305(b) process of the CWA entails assessing each use for rivers, lakes, and coastal waters, and causes and sources of impairment are identified wherever possible. Section 303(d) of the CWA along with the regulations at 40 CFR 130.7 requires states to identify those water bodies that are not expected to meet surface water quality standards (SWQS) after the implementation of technology-based controls and prioritize them for the development of TMDLs. A TMDL establishes the maximum amount of pollutants that may be introduced into a water body and still ensure attainment and maintenance of water quality standards. The 303(d) List of Impaired Waters (303(d) List) lists each water body in one of the following five categories:

- Category 1. Unimpaired and not threatened for all designated uses;
- Category 2. Unimpaired for some uses and not assessed for others;
- Category 3. Insufficient information to make assessments for any uses;
- Category 4. Impaired or threatened for one or more uses, but not requiring the calculation of a TMDL; or
- Category 5. Impaired or threatened for one or more uses and requiring a TMDL.

Waters listed in Category 5 constitute the 303(d) List and are to be reviewed and approved by the EPA. **Table 2: Impaired Waters, TMDLs and Impairments** details the Town's Category 5 and 4 water bodies. An overall map of the Town of Stoughton's stormwater system is attached as **Figure 3: Stormwater System**.

A draft 2024/2026 Integrated List of Waters is forecasted to be submitted in Fall 2025. Per MassDEP's website, the data range for the 2024/2026 Integrated Report will be 2011 through 2022. MassDEP is combining the 2024 and 2026 reporting cycles into a single 2024/2026 Integrated Report. The report will update all watersheds and coastal drainage areas for all Assessment Units statewide for the Secondary Contact Recreation use. For more information pertaining to the update, please refer to MassDEP's website.

Section 4.1 Background

Best management practices aim to improve and mitigate stormwater water quality impairments. The Town of Stoughton has 61 outfalls located within the Boston Harbor: Neponset Watershed, 80 outfalls located within the Taunton River Watershed, and 11 outfalls located within the Boston Harbor: Weymouth & Weir Watershed. This program will focus on impaired waters requiring a TMDL (Category 5) in the Taunton River Watershed and the Boston Harbor: Neponset Watershed, shown on **Figure 3**.

There are four (4) Category 5 water segments in Stoughton requiring a TMDL.

1. Beaver Meadow Brook (MA73-20) is a 3.3-mile segment, which outlets from Glenn Echo Pond, and is impaired due to dissolved oxygen. It also has a finalized TMDL report for E. coli. Beaver Meadow Brook is located within the Boston Harbor: Neponset Watershed.
2. A 1-mile segment of Unnamed Tributary (MA73-32) from the outlet of Town Pond to the confluence of Steep Hill Brook has an impairment for benthic macroinvertebrates. It has a finalized TMDL for E. coli as well. The Unnamed Tributary is located within the Boston Harbor: Neponset Watershed.
3. Ames Long Pond (MA62001), located within the Taunton Watershed, is impaired for aquatic plants (macrophytes), fanwort, non-native aquatic plants, and turbidity. This waterbody is approximately 87.7 acres. The turbidity impairment requires the Town to adhere to requirements in part B of Appendix H of the Permit. Turbidity falls under solids, oil and grease, or metals impairment requirements which are listed below (**Section 4.2.2**) and in **Appendix J**.
4. Steep Hill Brook (MA73-18) was previously a Category 3 ("No uses assessed") waterbody when the original SWMP and NOI were drafted. In the 2018/2020 Integrated List of Waters, this river is listed as having an E. coli impairment that lacks a final TMDL. This waterbody starts at Pinewood Pond and ends

at Bolivar Pond, Canton. It's approximately 0.9 miles in length and is located within the Boston Harbor: Neponset Watershed.

The Taunton River Watershed has a watershed-wide EPA approved TMDL requirement for pathogens. This impairment requires Stoughton to follow the requirements listed below to mitigate pathogen discharges to the MS4. The Town should prioritize sampling their 80 outfalls within the Taunton River Watershed for bacteria and pathogens. In addition, the Taunton River Watershed has a nitrogen impairment that lacks a final TMDL report. All discharges into the Taunton River Watershed must also be tested for nitrogen and the Town must adhere to requirements listed in part I of Appendix H of the Permit.

There are 11 outfalls in Town that are located within the Boston Harbor: Weymouth & Weir Watershed. This watershed has a watershed-wide EPA-approved TMDL for pathogens. Thus, Stoughton must follow the requirements for pathogens in Appendix F of the Permit (and discussed in **Section 4.2** below) to mitigate contaminated discharges to the MS4.

There are 61 outfalls in Town that are located within the Boston Harbor: Neponset Watershed. This watershed has a watershed-wide EPA-approved TMDL for bacteria. Stoughton must follow the requirements for bacteria in Appendix F of the Permit (discussed in **Section 4.2** below) to mitigate contaminated discharges to the MS4.

Section 4.1.1 Update to the Town's Phosphorus Impairment

The Unnamed Tributary (MA73-32), flowing north from Town Pond to Canton, had a phosphorus impairment in the 2014 Integrated List of Waters. This List of Waters is published by the MassDEP and updated every two (2) years. On February 2, 2022, the newest 2018/2020 Integrated List of Waters was finalized and removed the phosphorus impairment from the Unnamed Tributary.

According to part II.3 of Appendix H, the Town is relieved of its Appendix H part II phosphorus requirements if the waterbody is no longer impaired by phosphorus. Further, all part II phosphorus requirements due before the date of inapplicability are still required; all requirements due after the date of inapplicability are no longer required. Thus, starting in Year 4 and onward, the Town of Stoughton no longer has phosphorus impairment.

Section 4.2 Permit Requirements

Section 4.2.1 Public Education and Outreach

A. Nitrogen (implementation is ongoing)

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

A. Bacteria and Pathogens (implementation is ongoing)

1. Distribute an annual message that encourages the proper management of pet waste, including noting any existing ordinances where appropriate.
2. Disseminate educational materials to dog owners at the time of issuance or renewal of dog license, or other appropriate time.
3. Provide information to owners of septic systems about proper maintenance in any catchment that discharges to a water body impaired for bacteria or pathogens.

Section 4.2.2 Stormwater Management in New Development and Redevelopment

A. Nitrogen

1. Include a requirement that new development and redevelopment stormwater management SCMs be optimized for nitrogen removal. **This is included in the new Bylaws and Rules and Regulations.**
2. Retrofit inventory and priority ranking under 2.3.6.1.b shall include consideration of SCMs to reduce nitrogen discharges. **The inventory and priority ranking has been completed.**

B. Solids (Turbidity)

1. Incorporate designs that allow for shutdown and containment where appropriate to isolate the system in the event of an emergency spill or unexpected event.
2. Require any stormwater management system designed to infiltrate stormwater on commercial or industrial sites to provide the level of pollutant removal equal to or greater than the level of pollutant removal provided using biofiltration of the same volume of runoff to be infiltrated, prior to infiltration.

Section 4.2.3 Good Housekeeping and Pollution Prevention

A. Nitrogen

1. Establish requirements for use of slow-release fertilizers on permittee owned property currently using fertilizer, in addition to reducing and managing fertilizer use as provided in 2.3.7.1. **Completed.**
2. Establish procedures to properly manage grass cuttings and leaf litter on permittee property, including prohibiting blowing organic waste materials onto adjacent impervious surfaces. **Completed.**
3. Increase street sweeping frequency of all municipal owned streets and parking lots subject to Permit part 2.3.7.a.iii. (c) to a minimum of two (2) times per year, once in the spring (following winter activities such as sanding) and at least once in the fall (September 1 to December 1 or following leaf fall). **Completed.**

B. Solids (Turbidity)

1. Increase street sweeping frequency of all municipal owned streets and parking lots to a schedule determined by the permittee to target areas with potential for high pollutant loads. **Completed.**
2. Prioritize inspection and maintenance for catch basins to ensure that no sump shall be more than 50 percent full. Each annual report shall include the street sweeping schedule determined by the permittee to target high pollutant loads. **Completed.**

Section 4.2.4 Illicit Discharge

A. Bacteria and Pathogens

1. Implement the illicit discharge program required by the Permit. Catchments draining to any water body impaired for bacteria or pathogens shall be designated either Problem Catchments or High priority in implementation of the IDDE program. **Completed.**

Section 4.2.5 Additional Requirements (Nitrogen)

A. Nitrogen (**The Nutrient Source Identification Report has been completed.**)

1. Within four (4) years of the permit effective date the permittee shall complete a Nitrogen Source Identification Report. It includes the following elements:
 - i. Calculation of total MS4 area draining to the water quality limited segments of their tributaries, incorporating updated mapping of the MS4 and catchment delineations produced pursuant to part 2.3.4.6,
 - ii. All screening and monitoring results pursuant to part 2.3.4.7.d, targeting the receiving water segment(s),
 - iii. Impervious area and DCIA for the target catchment,

- iv. Identification, delineation, and prioritization of potential catchments with high nitrogen loading, and
- v. Identification of potential retrofit opportunities or opportunities for the installation of structural SCMs during redevelopment.

2. The final Nitrogen Source Identification Report shall be submitted to EPA as part of the Year 4 annual report.
3. Within five (5) years of the Permit effective date, the permittee shall evaluate all permittee-owned properties identified as presenting retrofit opportunities or areas for structural BMP installation under permit part 2.3.6.d. ii. Or identified in the Nitrogen Source Identification Report that are within the drainage area of the impaired water or its tributaries.
4. The permittee shall provide a listing of planned structural SCMs and a plan and schedule for implementation in the Year 5 annual report.
5. The permittee shall plan and install a minimum of one (1) structural SCM as a demonstration project within the drainage area of the water quality limited water or its tributaries within six (6) years of the permit effective date. The demonstration project shall be installed targeting a catchment with high nitrogen load potential.
6. The permittee shall install the remainder of the structural SCMs in accordance with the plan and schedule provided in the Year 5 annual report.
7. Any structural SCMs listed in Table 3 of Attachment 1 to Appendix H already existing or installed in the regulated area by the permittee or its agents shall be tracked, and the permittee shall estimate the nitrogen removal by the SCM consistent with Attachment 1 to Appendix H. The permittee shall document the SCM type, total area treated by the SCM, the design storage volume of the SCM and the estimated nitrogen removed in mass per year by the SCM in each annual report.

At any time during the permit term, the Town may be relieved of additional requirements in Appendix H applicable to it when in compliance with the requirements in Appendix H.

Figure 1
System Locus

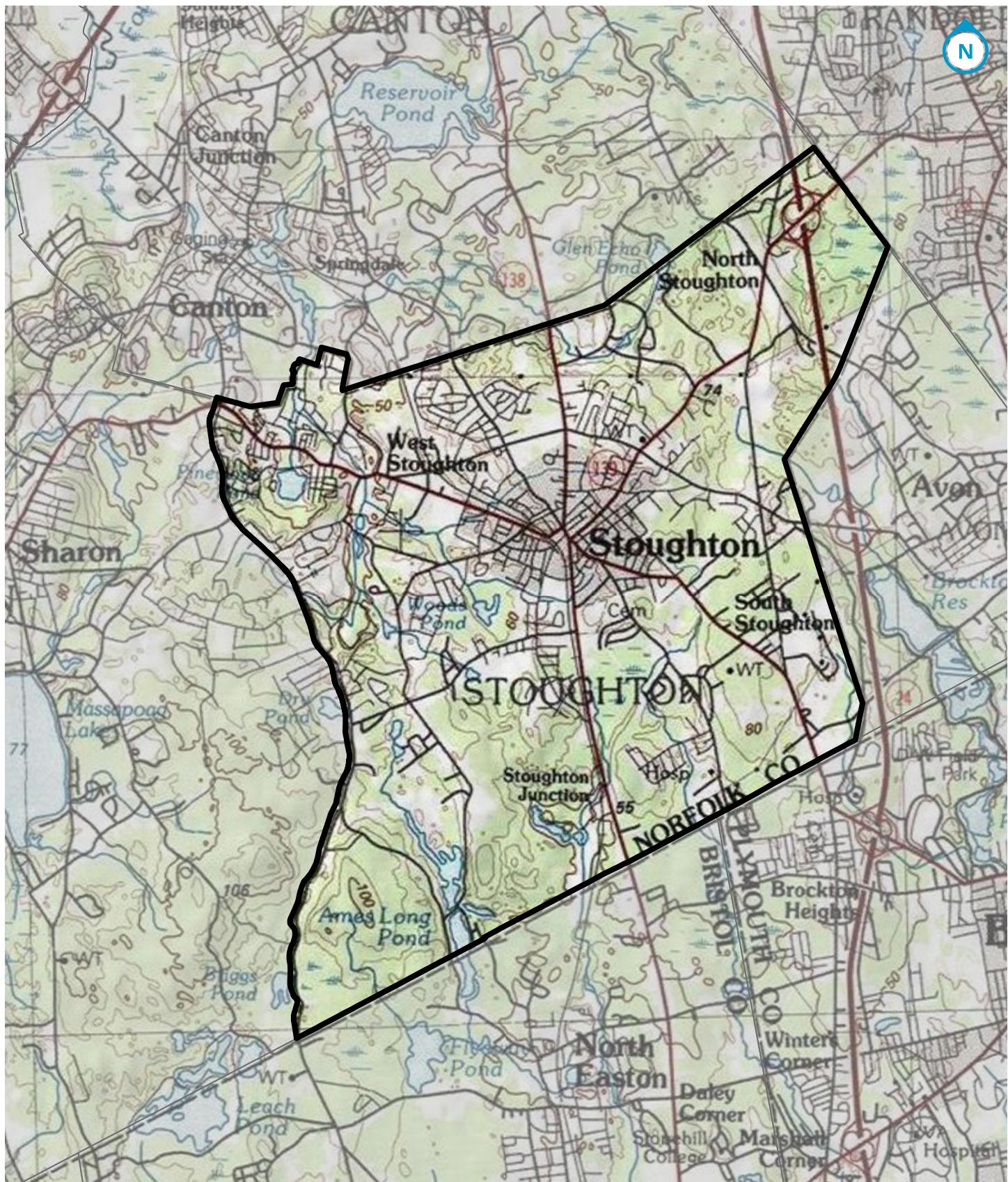


Figure 1
System Locus

Stoughton, MA

June 2025

0 2,500 5,000 10,000
1:5,000
Feet

Figure 2
MS4 Urbanized Areas

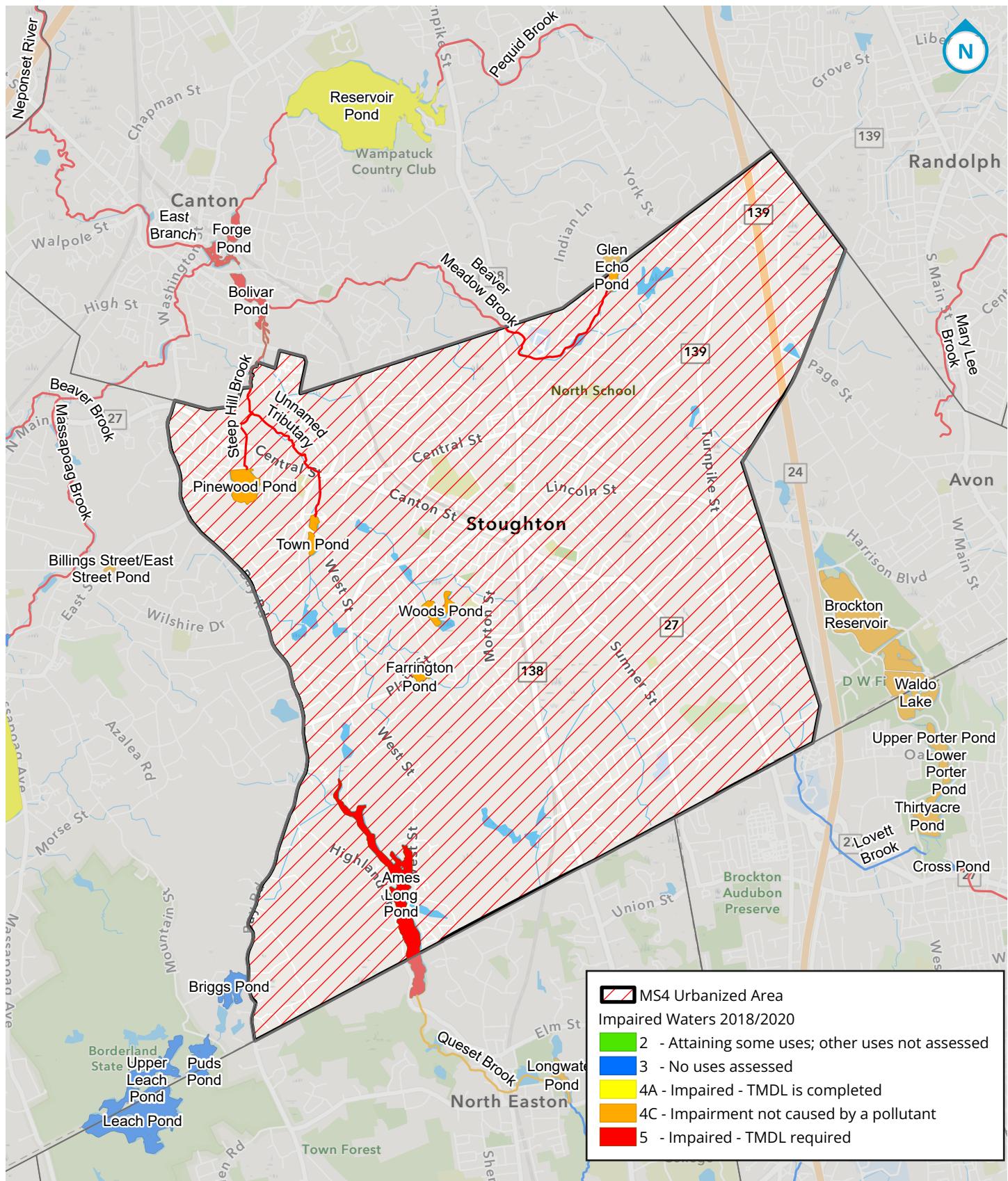


Figure 2
MS4 Urbanized Area

Stoughton, MA
June 2025

0 2,500 5,000 10,000
1:5,000
Feet

APEX

Figure 3
Stormwater System Map

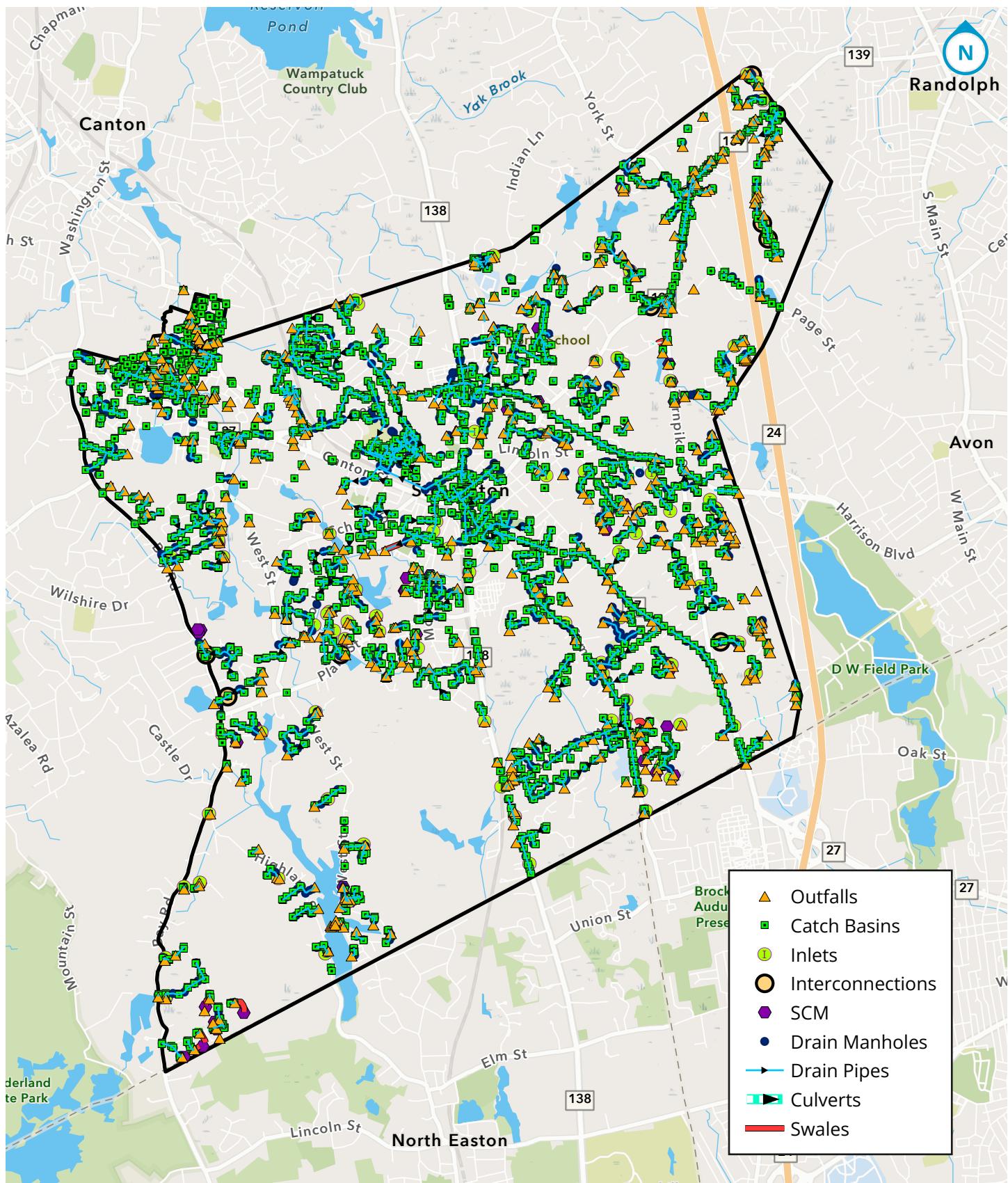


Figure 3
Stormwater System

Stoughton, MA

June 2025

0 3,000 6,000 12,000
1:6,000
Feet

Figure 4
Town Watersheds

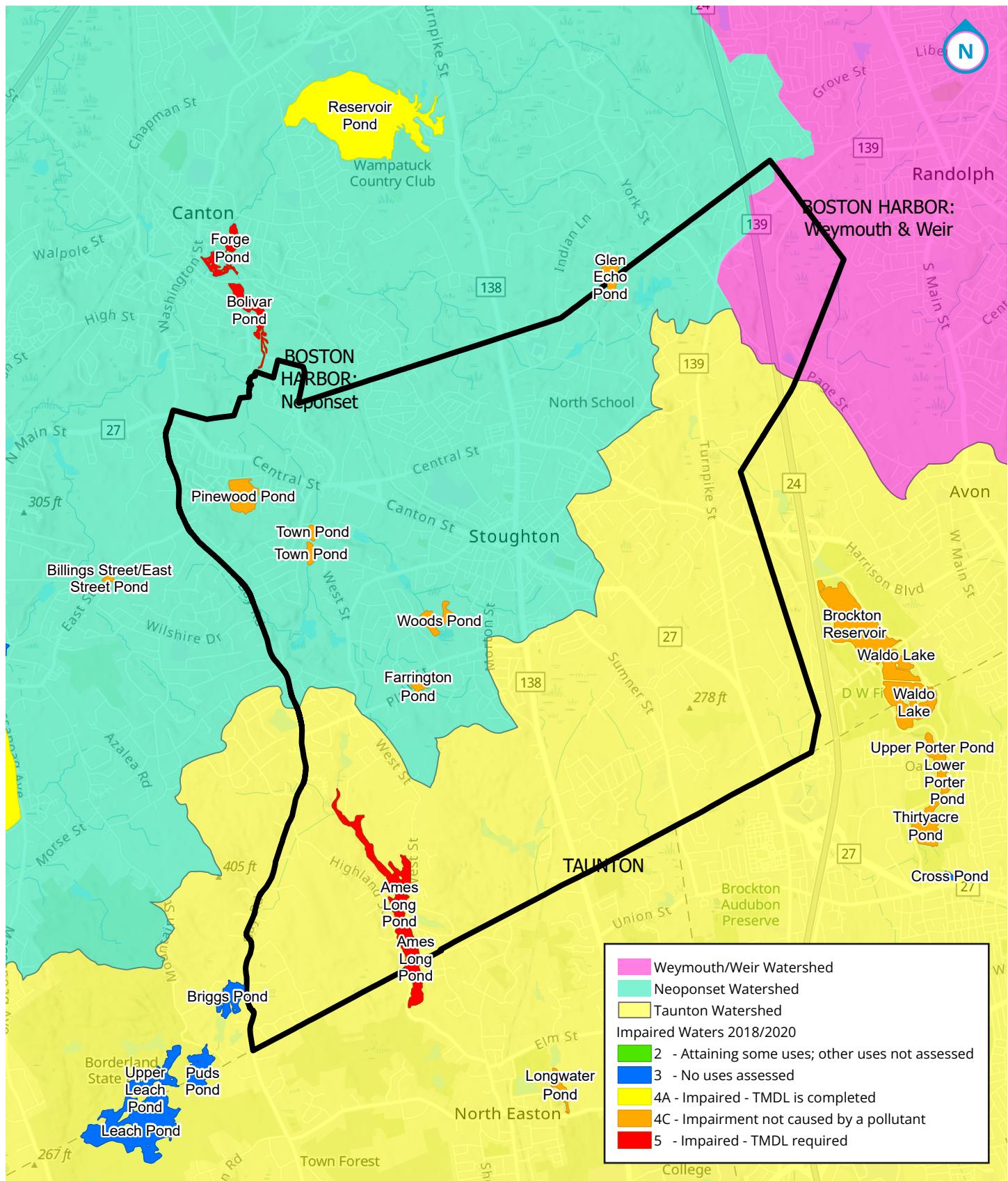


Figure 4
Town Watersheds

Stoughton, MA

June 2025

0 2,500 5,000 10,000
1:5,000
Feet



Appendix A

MA MS4 Hyperlinks and References

Appendix B

Notice of Intent

Appendix C

Permit Schedule

Appendix D

Endangered Species and Critical Habitats Protection Documents

Appendix E

MA MS4 General Permit – Appendix D – Historic Properties Documents

Appendix F

New or Increased Discharges

Appendix G

SSO Inventory

Appendix H

Current Stormwater Bylaw

Appendix I

2018 Annual Report Self Evaluation
Annual Evaluation for Years 1-5+

Appendix J

Minimal Control Measures BMPs

Appendix K

Illicit Discharge Detection and Elimination (IDDE) Plan

Appendix L

Year 4 MCM-5 Memos

Appendix M

Stormwater Pollution Prevention Plans (SWPPPs)

Appendix N

Municipal Facility Audit Report

Appendix O

SCM Observation Report