

Year 4 Annual Report

Massachusetts Small MS4 General Permit

Reporting Period: July 1, 2021-June 30, 2022

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

Unless otherwise noted, all fields are required to be filled out. If a field is left blank, it will be assumed the requirement or task has not been completed. Please ONLY report on activities between July 1, 2021 and June 30, 2022 unless otherwise requested.

Part I: Contact Information

Name of Municipality or Organization:

EPA NPDES Permit Number:

Primary MS4 Program Manager Contact Information

Name:

Title:

Street Address Line 1:

Street Address Line 2:

City:

State:

Zip Code:

Email:

Phone Number:

Stormwater Management Program (SWMP) Information

SWMP Location (web address):

Date SWMP was Last Updated:

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

Part II: Self-Assessment

First, in the box below, select the impairment(s) and/or TMDL(s) that are applicable to your MS4. Make sure you are referring to the most recent EPA approved Section 303(d) Impaired Waters List which can be found here: <https://www.epa.gov/tmdl/region-1-impaired-waters-and-303d-lists-state>

Impairment(s)

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

TMDL(s)

- In State: ☒ Assabet River Phosphorus
 ☐ Bacteria and Pathogen
 ☐ Cape Cod Nitrogen
☐ Charles River Watershed Phosphorus
 ☐ Lake and Pond Phosphorus
 Out of State: ☐ Bacteria/Pathogens
 ☐ Metals
 ☐ Nitrogen
 ☐ Phosphorus

Clear Impairments and TMDLs

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

Year 4 Requirements

- ☐ Developed a report assessing current street design and parking lot guidelines and other local requirements within the municipality that affect the creation of impervious cover, made it available as part of the SWMP, and:

- ☐ No updates were recommended
☒ Updates were recommended. The anticipated date or date of completion for updates is/was:

Anticipated: 2025-2027 for Subdivision and Zoning

- ☐ Developed a report assessing local regulations to determine the feasibility of making green infrastructure practices allowable when appropriate site conditions exist, made it available as part of the SWMP, and:

- ☐ No updates were recommended
☒ Updates were recommended. The anticipated date or date of completion for updates is/was:

Anticipated: 2025-2027 for Subdivision and Zoning

- ☒ Identified a minimum of 5 permittee-owned properties that could potentially be modified or retrofitted with BMPs to reduce impervious cover

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

An initial assessment of the Town's local code in terms of street design and parking lot guidelines and green infrastructure was completed in June 2022 using the Mass Audubon "Bylaw Review for LID & Climate-Smart, Nature Based Solutions" tool. A summary report documenting the assessment and final

recommendations will be completed in Permit Year 5 and made available as part of the SWMP.

Annual Requirements

- ☒ Provided an opportunity for public participation in review and implementation of SWMP and complied with State Public Notice requirements
- ☒ Kept records relating to the permit available for 5 years and made available to the public
- ☒ The SSO inventory has been updated, including the status of mitigation and corrective measures implemented
 - ☐ This is not applicable because we do not have sanitary sewer
 - ☒ This is not applicable because we did not find any new SSOs
 - ☐ The updated SSO inventory is attached to the email submission
 - ☐ The updated SSO inventory can be found at the following website:
- ☒ Updated system map due in year 2 as necessary
- ☒ Provided training to employees involved in IDDE program within the reporting period
- ☒ Properly stored and disposed of catch basin cleanings and street sweepings so they did not discharge to receiving waters
- ☒ All curbed roadways were swept at least once within the reporting period
- ☒ Enclosed all road salt storage piles or facilities and implemented winter road maintenance procedures to minimize the use of road salt
- ☒ Implemented SWPPPs for all permittee owned or operated maintenance garages, public works yards, transfer stations, and other waste handling facilities
- ☒ Updated inventory of all permittee owned facilities as necessary
- ☒ O&M programs for all permittee owned facilities have been completed and updated as necessary
- ☒ Implemented all maintenance procedures for permittee owned facilities in accordance with O&M programs
- ☒ Implemented program for MS4 infrastructure maintenance to reduce the discharge of pollutants
- ☐ Inspected all permittee owned treatment structures (excluding catch basins)

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

The Town's "Good Housekeeping and Pollution Prevention Program for Municipal Operations and Maintenance" includes maintenance procedures for Town facilities and MS4 infrastructure, which are implemented to the maximum extent practicable.

In July 2022 (Permit Year 5), the Town's stormwater consultant conducted BMP inspections at all mapped municipal detention basin BMPs (38 in total). The inspections included general condition assessments and notes of any maintenance issues. Inspection records were logged in the Town's ArcGIS Online database. Further review by Town staff determined that not all of the mapped BMPs are the responsibility of the Town; this information will be incorporated into the BMP inspection program and overall O&M good housekeeping

program moving forward.

Bacteria/ Pathogens (Combination of Impaired Waters Requirements and TMDL Requirements as Applicable)Annual Requirements*Public Education and Outreach**

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

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

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

Some of the seasonal messages above were distributed by the Central Massachusetts Regional Stormwater Coalition (CMRSWC) on behalf of the Town.

Phosphorus (Combination of Impaired Waters Requirements and TMDL Requirements as Applicable)Annual Requirements*Public Education and Outreach**

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

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

Good Housekeeping and Pollution Prevention for Permittee Owned Operations

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

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

Some of the seasonal messages above were distributed by the CMRSWC on behalf of the Town.

All municipal-owned streets and parking lots were swept once in the spring. The Town swept again in the fall to the maximum extent feasible.

Optional: Use the box below to provide any additional information you would like to share as part of your self-assessment:

Part III: Receiving Waters/Impaired Waters/TMDL

Have you made any changes to your lists of receiving waters, outfalls, or impairments since the NOI was submitted?

☒ Yes

☐ No

If yes, describe below, including any relevant impairments or TMDLs:

Northborough's NOI listed water quality impairments and TMDLs for the Town's receiving waters based on the 2014 303(d) List. In Permit Year 2, the Town evaluated changes to the impairments and/or receiving waters based on the final 2016 303(d) List and the analysis was included in the Town's Permit Year 2 Annual Report and is available in the Town's SWMP.

The Town has evaluated changes to the impairments and/or receiving waters based on the final 2018/2020 303(d) List and the analysis is included as an attachment with this report. The changes described herein do not add, remove, or change any Appendix H impairments as listed in the NOI and Permit Year 2 receiving water update.

Part IV: Minimum Control Measures

Please fill out all of the metrics below. If applicable, include in the description who completed the task if completed by a third party.

MCM1: Public Education

Number of educational messages completed **during this reporting period:**

*Below, report on the educational messages completed **during this reporting period**. For the measurable goal(s) please describe the method/measures used to assess the overall effectiveness of the educational program.*

BMP:1A-1D: Education and Outreach to All Audiences - Town Website

Message Description and Distribution Method:

On the Northborough Engineering Department's Public Education webpage, the Town provides several educational materials which explain the impacts of stormwater pollution and ways to reduce it. This information is available to anyone who visits the webpage. The materials address proper pet waste disposal, fertilizer use, septic system maintenance, and grass clipping disposal.

The Engineering Department's Stormwater/Drainage webpage provides information on the MS4 program. It also includes the Town's past annual reports, the SWMP, a Citizen's Guide to Understanding Stormwater, and links to EPA stormwater and pollution prevention educational materials.

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

Educational materials are available to all visitors of the Town webpages. In Permit Year 4, the Stormwater/Drainage webpage received 217 page views.

Message Date(s):

Message Completed for: Appendix F Requirements ☒ Appendix H Requirements ☒

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

If yes, describe why the change was made:

BMP: 1A-1D: Education and Outreach to All Audiences - Leaf Litter and Recycling

Message Description and Distribution Method:

The Town also maintains Leaf Litter and Trash & Recycling webpages. The Leaf Litter webpage includes an informational document explaining how improperly handled yard waste can lead to stormwater pollution and how leaf litter can clog storm drains and increase flooding. The webpage also provides the location of the Highway Garage where residents can dispose of leaf litter.

The Trash & Recycling webpage includes a link to a MassDEP Home Composting Guide. A "Recycling Collection Calendar" with information on where to bring leaves, grass clippings, and hedge clippings is linked on the webpage and also mailed to residents annually.

Targeted Audience: Residents

Responsible Department/Parties: DPW - Engineering

Measurable Goal(s):

In Permit Year 4, the Town's Leaf Litter webpage received 128 page views. The Trash & Recycling webpage received 15,916 page views.

The 2022-2023 Recycling Collection Calendar brochure was mailed to all residents.

Message Date(s): Website education: Ongoing
Recycling Collection Calendar: Early June 2022

Message Completed for: Appendix F Requirements ☒ Appendix H Requirements ☐

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

If yes, describe why the change was made:

BMP: 1A: Education and Outreach to Residents - Think Blue

Message Description and Distribution Method:

Northborough was part of the Think Blue Massachusetts educational advertisement campaign in Permit Year 4. The Town is a member of the Central Massachusetts Regional Stormwater Coalition (CMRSWC) which participates in the Think Blue Massachusetts campaign. Think Blue Massachusetts shared a "Fowl Water" video across social media to educate the public in member communities about stormwater runoff. The video depicts the importance of proper management of pet waste and household oil waste. After the campaign, a survey was distributed to viewers of the video which analyzed the impact of the campaign.

Targeted Audience: Residents

Responsible Department/Parties: DPW - Engineering

Measurable Goal(s):

In 2022, the post-campaign survey illustrated that 15% of respondents recalled seeing the "Fowl Water" video and were more likely to be educated on how stormwater pollution ends up in local waterways. The 2022 campaign received 8,789 impressions across YouTube, Facebook, and Instagram (including 864 Spanish language impressions) for Northborough.

Message Date(s): May 31 to June 17, 2022

Message Completed for: Appendix F Requirements ☒ Appendix H Requirements ☒

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

If yes, describe why the change was made:

BMP: 1A: Education and Outreach to Residents - Pet Waste

Message Description and Distribution Method:

The Town's Dog Control Department webpage includes a pet waste disposal reminder infographic which contains a link to the Town's "Pooper Scooper Regulation" (Town Regulation 2-24-090). A MassDEP/DCR "Dog Waste and Surface Water Quality" brochure, customized for the Town of Northborough, was also sent with dog license renewals.

Targeted Audience: Residents

Responsible Department/Parties: Town Clerk

Measurable Goal(s):

The educational materials on the Dog Control Department webpage are available to all visitors of the webpage.

There were 1,899 dog licenses issued in Permit Year 4.

Message Date(s): Website: Ongoing
Dog Waste brochure: with licenses in early 2022

Message Completed for: Appendix F Requirements ☒ Appendix H Requirements ☒

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

If yes, describe why the change was made:

BMP: 1A-1D: Education and Outreach to All Audiences - CMRSWC

Message Description and Distribution Method:

The CMRSWC shared educational messages to social media on behalf of the Town of Northborough. The Facebook and Twitter posts provided information on proper disposal of pet waste, septic system maintenance, grass clippings, fertilizer use, and disposal of leaf litter. The messages are available to the public to view.

Targeted Audience: All Audiences

Responsible Department/Parties: CMRSWC

Measurable Goal(s):

The CMRSWC Twitter account has approximately 390 followers on Twitter. The CMRSWC Facebook account has 96 followers and 75 Likes.

"Pet Waste Belongs in the Trash!" pet waste disposal post: July 29, 2021
"Managing Your Septic System" septic system maintenance post: August 1, 2021
"Autumn Rains & Stormwater Drains" leaf litter disposal post: October 28, 2021

Message Date(s): "The Leaves are Falling" leaf litter disposal post: October 29, 2021
 "Improve Your Home Without Harming Your Community" fertilizer post: May 27, 2021
 "Use Lawn Chemicals Sparingly" fertilizer post: May 29, 2022
 "Retain Grass Clippings and Chopped Leaves On-Site" grass clipping post: May 29, 2021
 "A Stormwater-Friendly Lawn" grass clipping disposal post: May 30, 2022
 "Don't Overwater After Fertilizing" fertilizer post: May 31, 2022
 "Know Before You Mow" grass clippings disposal post: May 31, 2022

Message Completed for: Appendix F Requirements ☒ Appendix H Requirements ☒

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

If yes, describe why the change was made:

Add an Educational Message

MCM2: Public Participation

Describe the opportunity provided for public involvement in the development of the Stormwater Management Program (SWMP) **during this reporting period:**

The Town's Stormwater Management Plan (SWMP) and Year 1, Year 2, and Year 3 Annual Reports were available on the Town's Stormwater/Drainage webpage. The documents were available to the public for review and comment.

The Stormwater Management Regulations were presented at Northborough Conservation Commission meetings held on July 12 and August 16, 2021, where public input was solicited. The meetings were advertised in accordance with MA public meeting law, and recordings of the meetings are available to the public.

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

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

The Town facilitates an SSO public notification subscription service. Citizens can sign up to receive notifications and updates of any SSO events or any events required to be reported under 314 CMR 16.00.

The Louise Houle Annual Town Cleanup event was held on April 30, 2022. Volunteers collected debris and litter, and the Department of Public Works provided disposal services for the trash. Approximately 306 bags of trash were collected at the event.

The Central Massachusetts Mosquito Control Project worked with Northborough to provide insertion of larvicides into Town catch basins and collect tires for disposal.

The Town held a household hazardous waste collection day on October 23, 2021 providing residents the opportunity to dispose of any hazardous waste at the Highway Garage. The Town provided 240 boxes to

residents for the disposal of household waste items such as paint cans, waste aerosols, fire extinguishers, etc. The Town also provides information for other hazardous waste disposal services on their Recycling Collection Calendar.

The Town held an electronics recycling event on August 21, 2021 for residents to drop off used electronics and appliances for recycling. The Town Clerk also advertised a post on Instagram for a drive-through re-use and recycling event held on September 25, 2021 in a neighboring town open to all Northborough residents.

The Public Works Department advertises brush, grass, and leaves collection for residents on their webpage. The Highway Garage offers disposal of brush, grass clippings, and leaf litter Monday through Friday year-round.

MCM3: Illicit Discharge Detection and Elimination (IDDE)

Sanitary Sewer Overflows (SSOs)

Check off the box below if the statement is true.

- ☐ This SSO section is NOT applicable because we DO NOT have sanitary sewer

*Below, report on the number of SSOs identified in the MS4 system and removed **during this reporting period**.*

Number of SSOs identified:

Number of SSOs removed:

MS4 System Mapping

Optional: Provide additional status information regarding your map:

The Town's stormwater GIS mapping is refined and updated as the IDDE Program and catch basin cleaning and inspection program are implemented.

Screening of Outfalls/Interconnections

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

- ☒ No outfalls were inspected
☐ The outfall screening data is attached to the email submission
☐ The outfall screening data can be found at the following website:

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

Number of outfalls screened:

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

Percent of outfalls screened: 86

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

At the end of Permit Year 3, the Town had attempted to visit all known outfalls and had successfully screened 86%. The remaining 35 outfalls proved to be difficult to locate or access and required extra effort to field verify. These outfalls were investigated again in August and September 2022 (Permit Year 5) and many were located, inventoried, and screened for dry weather flow. The Town will work to locate/access the remaining outfalls in Permit Year 5 and screening data will be provided with the Permit Year 5 annual report.

Catchment Investigations

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

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

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

Number of catchment investigations completed this reporting period: 0

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

Percent of total catchments investigated: 0

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

The Town will begin catchment investigations in Permit Year 5.

IDDE Progress

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

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

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

Number of illicit discharges identified: 0

Number of illicit discharges removed: 0

Estimated volume of sewage removed: 0 gallons/day

*Below, report on the total number of illicit discharges identified and removed to date. At a minimum, report on the number of illicit discharges identified and removed **since the effective date of the permit (July 1, 2018)**.*

Total number of illicit discharges identified:

Total number of illicit discharges removed:

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

Employee Training

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

A training was completed for DPW employees on June 26, 2022, which reviewed the overall MS4 program, illicit discharges to the drain, IDDE Program responsibilities, and reporting.

The Town Engineer is also a member of the Steering Committee for CMRSWC and attends meetings regularly.

MCM4: Construction Site Stormwater Runoff Control

*Below, report on the construction site plan reviews, inspections, and enforcement actions completed **during this reporting period**.*

Number of site plan reviews completed:

Number of inspections completed:

Number of enforcement actions taken:

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

The Stormwater Management Bylaw adopted in Permit Year 3 and the associated Regulations adopted on August 16, 2021 refine and streamline the procedures for site plan review, inspections, and enforcement.

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

Ordinance or Regulatory Mechanism

Date update was completed (due in year 3):

As-built Drawings

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

Number of as-built drawings received:

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

Retrofit Properties Inventory

Below, list the permittee-owned properties that could be modified or retrofitted with BMPs to mitigate impervious areas (at least 5):

The Town's BMP Retrofit Assessment identified 5 Town-owned properties that could be modified or retrofitted with BMPs: the War Memorial property on Hudson Street, Assabet Park, Melican Middle School, Vacant Town Land on Stratton Way, and the White Cliffs Municipal Building.

MCM6: Good Housekeeping**Catch Basin Cleaning**

*Below, report on the number of catch basins inspected and cleaned, along with the total volume of material removed from the catch basins **during this reporting period**.*

Number of catch basins inspected:

Number of catch basins cleaned:

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

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

Total number of catch basins:

If applicable:

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

The Town plans to identify any catch basins which have been more 50% full more than once and clean these structures again in Permit Year 5.

Street Sweeping

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

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

Stormwater Pollution Prevention Plan (SWPPP)

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

Number of site inspections completed:

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

No corrective actions were needed at the Highway Facility.

Additional Information

Monitoring or Study Results

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

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

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

Additional Information

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

The Town had two vacant staff positions, one in Conservation and one in Planning, for a portion of Permit Year 4 which impacted staff availability throughout the permit year for MS4 program implementation.

COVID-19 Impacts

Optional: If any of the above year 4 requirements could not be completed due to the impacts of COVID-19, please identify the requirement that could not be completed, any actions taken to attempt to complete the requirement, and reason the requirement could not be completed below:

Typically the Town provides educational materials at Annual Town Meeting in the spring. Due to COVID, this educational campaign was not completed in Permit Year 4.

Activities Planned for Next Reporting Period

Please confirm that your SWMP has been, or will be, updated to comply with all applicable permit requirements including but not limited to the year 5 requirements summarized below. (Note: impaired waters and TMDL requirements are not listed below)

Yes, I agree ☒

Annual Requirements

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

- Continue investigations of catchments associated with Problem Outfalls
- Implemented SWPPPs for all permittee owned or operated maintenance garages, public works yards, transfer stations, and other waste handling facilities
- Review inventory of all permittee owned facilities in the categories of parks and open space, buildings and facilities, and vehicles and equipment; update if necessary
- Review O&M programs for all permittee owned facilities; update if necessary
- Implement all maintenance procedures for permittee owned facilities in accordance with O&M programs
- Implement program for MS4 infrastructure maintenance to reduce the discharge of pollutants
- Enclose all road salt storage piles or facilities and implemented winter road maintenance procedures to minimize the use of road salt
- Review as-built drawings for new and redevelopment to ensure compliance with post construction bylaws, regulations, or regulatory mechanism consistent with permit requirements
- Inspect all permittee owned treatment structures (excluding catch basins)
- Identify additional permittee-owned properties that could potentially be modified or retrofitted with BMPs to reduce impervious areas so that the permittee maintains a minimum of 5 sites in their inventory, until such a time when the permittee has less than 5 sites remaining

Provide any additional details on activities planned for permit year 5 below:

The Town acknowledges the General Permit Year 5 requirements and will complete as many activities as possible based on funding and staff availability.

Part V: Certification of Small MS4 Annual Report 2021

40 CFR 144.32(d) Certification

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

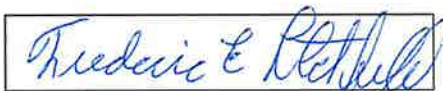
Name:

Frederic E. Litchfield

Title:

Town Engineer

Signature:



Date:

9/28/22

[Signatory may be a duly authorized representative]