

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:

- ☐ 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:

- ☐ 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:

Due to staff turnover at the Administrative level in Permit Year 4, funding was not available for these requirements. The Town has allocated funding in Permit Year 5 to complete these requirements.

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:

SSO inventory: There have been no SSOs found from 2017 through June 30, 2021. There was one SSO reported in Permit Year 4; see attached documentation.

The Town's Municipal Good Housekeeping and Pollution Prevention Program includes maintenance procedures for Town facilities and MS4 infrastructure, which are implemented to the maximum extent practicable. Maintenance was performed as needed for MS4 infrastructure in Permit Year 4. BMPs such as swales are inspected during the catch basin cleaning efforts.

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:

Disseminating information about proper pet waste management during dog license renewals was not completed during Permit Year 4. However, a Think Blue Massachusetts brochure entitled "Do Your 'Doody' for Clean Water", which highlights proper management of pet waste, is included on the Town's Stormwater Management webpage and is readily available to residents. The Town anticipates providing additional pet waste materials with dog licenses in Permit Year 5.

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

Annual Requirements

*Public Education and Outreach**

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

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

Good Housekeeping and Pollution Prevention for Permittee Owned Operations

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

Nitrogen Source Identification Report

- ☐ Completed the Nitrogen Source Identification Report

- ☐ The Nitrogen Source Identification Report is attached to the email submission
- ☐ The Nitrogen Source Identification Report can be found at the following website:

Potential structural BMPs

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

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

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

Nitrogen Source Identification Report & Potential structural BMPs: Due to staff turnover at the Administrative level in Permit Year 4, funding was not available for these requirements. The Town has allocated funding in Permit Year 5 to complete these requirements.

Leaf litter messaging: Social media posts are planned to begin within Permit Year 5 to disseminate additional seasonal education to residents.

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

The Town was awarded a grant to complete a Municipal Vulnerability Preparedness (MVP) Community Resilience Workshop Process. This included identifying a core team at the local level, evaluation/assessment which included interviews with the community and stakeholders, and conducting workshops. The MVP process was completed in Permit Year 4 and the final report is available from the Planning Department. The Town plans to update their Hazard Mitigation Plan within Permit Year 5.

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:

The Town's NOI listed receiving waters and impairments based on the water quality limited waters in the 2014 303(d) Integrated List. The Town evaluated changes to the impairments and/or receiving waters based on the final 2016 303(d) Integrated List and the analysis was included in the Town's Permit Year 2 Annual Report and is available in the SWMP. The 2018/2020 303(d) Integrated List was evaluated and showed no changes to the receiving bodies or impairments. Attached is a summary of this analysis.

During Permit Year 4, 15 outfalls were removed from the outfall inventory because they were determined to not exist or were another stormwater asset. These modifications did not add, remove, or change any receiving waters 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:Public Education and Outreach to Residents & Developers (Stormwater Management Website)

Message Description and Distribution Method:

The Town's Stormwater webpage contains links to the following key documents under their stormwater management plan:

- The Town's Stormwater Management Plan
- The Town's Stormwater Management By-Law
- The Town's Wetlands Protection By-Law
- Recent Annual Reports

Under the "Learn More" tab, the webpage also includes an infographic entitled "Do Your Doody for Clean Water"

Elsewhere on the page is more public education and informational materials for residents:

- "Think Blue Massachusetts"
- "After the Storm - A Citizen's Guide to Understanding Stormwater"
- "MassDEP Stormwater Information"
- "FEMA for Kids"
- "EPA Environmental Kids Club"
- "NOAA for Kids - The Ocean"
- "The Scoop on Stormwater" (An EPA video)
- Small articles entitled "What is Stormwater?", "Why Stormwater Management?", and "Stormwater and Wastewater Are Not the Same!"

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

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:Public Education and Outreach to Businesses (Stormwater Management Webpage)

Message Description and Distribution Method:

The Town's Stormwater webpage contains links to the following educational materials tailored to businesses under their stormwater management plan:

- "Put Waste in its Place for Clean Water in Webster"
- "Keep Pollution at Bay - One Parking Lot at a Time"

Targeted Audience: Businesses, institutions and commercial facilities

Responsible Department/Parties: Planning

Measurable Goal(s):

All visitors to the webpage are able to view and download these educational materials.

Message Date(s): Ongoing

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:Public Education and Outreach to Developers (Stormwater Management Webpage)

Message Description and Distribution Method:

The Town's Stormwater webpage contains links to the following educational materials tailored to developers under their stormwater management plan:

- "Stop Erosion in its Tracks to Keep Our Waters Clean"
- "Plan Ahead to Prevent Pollution: Tips to Reduce Stormwater Runoff During Construction"

Targeted Audience: Developers (construction)

Responsible Department/Parties: Planning

Measurable Goal(s):

All visitors to the webpage are able to view and download these educational materials.

Message Date(s): Ongoing

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:Public Education and Outreach to Industrial Facilities (Stormwater Management Website)

Message Description and Distribution Method:

The Town's Stormwater webpage contains links to the following educational materials tailored to industrial facilities under their stormwater management plan:

- "Put Hazards in Their Place: Safe Storage and Handling Tips for Chemicals and Hazardous Materials"

Targeted Audience: Industrial facilities

Responsible Department/Parties: Planning

Measurable Goal(s):

All visitors to the webpage are able to view and download these educational materials.

Message Date(s): Ongoing

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:Public Education and Outreach to Residents (Social Media)

Message Description and Distribution Method:

The Town had made a few informational posts on their Facebook page related to water quality for their residents:

- The Town had shared an article entitled "Efforts underway to limit fertilizer use, curb dangerous algae blooms in lakes & ponds"

- The Town shared a health advisory regarding the bloom of Cyanobacteria in the South Pond

Targeted Audience: Residents

Responsible Department/Parties: Planning

Measurable Goal(s):

The May 2022 post on Cyanobacteria has 5 likes, 22 comments, and 24 shares.
These posts are available to the Town's 4,300 Facebook followers.

Message Date(s): Fertilizer use and algae blooms article post: August 19th, 2021
Health advisory regarding cyanobacteria: May 31st, 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:Public Education and Outreach to Residents (Health Department Webpage)

Message Description and Distribution Method:

The Town's Health Department has a link to the EPA's "SepticSmart" webpage, with informational material on septic systems and proper maintenance.

Targeted Audience: Residents

Responsible Department/Parties: Health Department

Measurable Goal(s):

All visitors to the webpage are able to follow the link to the educational materials.

Message Date(s): Ongoing

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 SWMP was posted on the Town's website and is available for public review. Comments can be provided via phone call or through a linked Department Contact Form.

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's annual Earth Day Clean-Up was held on April 30th, 2022. The Town DPW picked up the waste collected that day for proper disposal.

The Town sold stickers for the Compost Facility, allowing residents to bring yard waste for proper disposal. This was advertised on the Town's Facebook page in Spring 2022.

The Town allowed residents to bring Christmas trees to the Compost Facility beginning December 27, 2021.

The Town had volunteers run a beach clean-up day in October 2021. This was advertised on the Town's Facebook page.

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:

Mapping was updated during outfall investigations in Permit Year 4. The Town will continue to make updates to the mapping as the IDDE Program is 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:

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

As reported in the Permit Year 1 annual report, Webster has completed a significant effort to locate, inventory, and screen MS4 outfalls. The Town had visited all MS4 outfall locations and attempted to inventory and screen them. At that time, 80% of the known MS4 outfalls had been successfully screened for dry weather flow, with a portion of outfalls remaining unscreened because they require more extensive effort to locate, access, or otherwise complete screening. In Permit Year 3, two new outfalls were added to the Town's GIS mapping after completing field investigations and construction of a detention basin at a new water treatment plant.

In Permit Year 4, more investigations were conducted to locate difficult to find outfalls. 15 mapped outfalls were determined to be a different stormwater asset or to not exist. 18 were successfully screened at the outfall or upstream structure. Screening data is attached. The Town will continue to try to locate and field verify the remaining mapped outfalls that have not been field verified.

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:

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

Percent of total catchments investigated:

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

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:

Number of illicit discharges removed:

Estimated volume of sewage removed: gallons/day

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

Total number of illicit discharges identified:

Total number of illicit discharges removed:

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

Employee Training

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

Monthly meetings are held with all Highway Department staff that review safety and road work precautions, as well as identifying illicit discharges at stormwater outfalls, and catch basin cleanings.

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:

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: 1

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):

Due to staff turnover at the Administrative level in Permit Year 4, funding was not available for this requirement. An initial review of town-owned properties was completed and it was determined that the following properties have been recently retrofitted with BMPs:

- Park Avenue Elementary School
- Lake Parkway
- Memorial Beach Water Treatment Plant
- Hydrodynamic separators have been installed at Tracy Court, June Avenue, Colonial Park, Kenneth Avenue; stormwater basin at Dominique Drive; and Town Hall, the Police Station, and the Library have underground infiltration systems

The following properties are planned to have BMPs as part of upcoming redevelopment projects:

- Bartlett High School
- Webster Middle School

The list of properties for BMP retrofit is anticipated to be refined and finalized in Permit Year 5.

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:

Total number of catch basins note: The total count may include some private and MassDOT catch basins; ownership will be refined as mapping is improved.

Catch basins are inspected when they are cleaned. Additional catch basins were inspected throughout the year during construction and to check for acceptable water flow.

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:

☐ 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:

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 has prepared draft Stormwater Regulations. The effort to finalize and adopt the Regulations has been on hold while the Town works to hire a Conservation Agent. Implementation of the Regulations will require re-organization of Land Use Department and include the Conservation Agent and Building Inspector to participate in finalizing the permitting methodology to be included in the Regulations. The hiring of an Agent is anticipated in Permit Year 5 and the Town should be able to finalize the Regulations.

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:

The Regulations update was impacted by COVID-19 as the hiring process for a Conservation Agent was slowed. Developing additional website content and completing public outreach was also impacted due to lack of capability for staff collaboration while they worked split shifts. These items are both anticipated for completion in Permit Year 5.

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: Title:

Signature: Date:

[Signatory may be a duly authorized representative]