

# MS4 Year 3 Annual Report Tips and FAQs

## Tips while filling out this year's form:

- Before beginning to fill out the form, please make sure to **download and save the form to your computer**. Do not fill out the report on your browser (e.g. Chrome or Internet Explorer) because you may not be able to save the information you fill out!
- Please try to fill out this form electronically and email to EPA. This allows us to more easily process your reporting data and continue to fill out portions of your Annual Report for next year.
- Any additional data requested in the form should either be attached as a file directly to the email you submit to EPA with the Annual Report or provided via a web link to these documents that is accessible to EPA.

- The catchment investigation data is attached to the email submission
- The catchment investigation data can be found at the following website:

- Most large textboxes will expand if you have more to say than will fit in the initial textbox space.
- MCM 1: For “Targeted Audience” and “Responsible Department/Parties” you can either select a common audience or department from the dropdown list or type your own answer.

To enter your own answer, click on the box itself and type as you would in the other textboxes.

Targeted Audience:	<input type="text"/>
Responsible Department:	<input type="text"/>
Measurable Goal(s):	<input type="text"/>
	<input type="text"/>

Businesses, institutions and commercial facilities  
Developers (construction)  
Industrial facilities  
Residents

- For boxes that say [Select Units], please use the dropdown to select the appropriate units. You cannot type over these unit boxes. This will help us collect usable, clear information.
- All boxes that ask for a numerical answer will only accept a number. Most of these have been auto filled with a 0. Please update the correct number for your municipality or leave as 0 if that is appropriate. Any required numerical fields left blank will be recorded as data not reported.

0	[Select Units] ▾
	[Select Units]
	tons
	pounds
	kilograms
	cubic yards

- Covid-19: There is a textbox towards the bottom of the form for you to discuss any requirements that have been impacted by the Covid-19 pandemic. This box is not required but is a place to enter any relevant challenges or updates that you would like to provide. The textboxes under “Year 3 Requirements” and “Annual Requirements” in the Self-Assessment portion of the form also prompt you to discuss any progress that was impacted by the Covid-19 pandemic.

*Optional:* If you would like to describe progress made on any incomplete requirements listed above, provide any additional information, and/or if any of the above year 3 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:

- New Permittees: In Part IV, please ensure you fill out any metrics or sections with an asterisk (\*) before the title. For example, MCM1, MCM2, Catch Basin Cleaning, and Street Sweeping have asterisks. Also include any additional metrics that you have started within this reporting period. Any additional information is optional. Then proceed to Part V and VII.

### Frequently Asked Questions:

What is the time period that we are reporting for in this annual report?

**July 1, 2020 to June 30, 2021 for the Year 3 report. For reference, this can be found on the first page of the Annual Report.**

There are several items under the Year 3 and Annual Requirements that ask if I updated something “as necessary”. If I had no updates to, for example, my system map, should I still mark those checkboxes as complete?

**Yes, you should check off any box with “as necessary” if the relevant requirement (e.g. phase 1 of the system map) is complete and you did not need to make any updates to it over the reporting period.**

In several places in the Annual Report, EPA asks for MS4 operators to report on the number of times an action was taken. For example, number of site inspections completed. Is this the total number of inspections altogether or per site? For example, you have 20 sites and you inspect them five times each. Do you report 20 or 100 inspections completed?

**Report the total number of inspections for all sites. In the given example, report the total of 100 inspections completed.**

Is it acceptable to say that I have not completed a BMP if it was not due this permit term?

**Yes, you are required to report accurately about what you have or have not done during the reporting period.**

If a certain requirement is listed in the annual report but it is not due until year 4 or beyond, do you need to note that it will be conducted in year 4 or do you just leave it blank because it is clear that the reporting is beyond year 3?

**Where an action or deliverable in the annual report is due beyond Year 3, we are looking for you to provide a status update on any work done towards that requirement. It is acceptable to report that you haven't begun work on these requirements or that you will begin working on them in the next reporting year.**

If my town has started working on some of the BMPs that are not due in this permit term, can I take credit for them during this permit term?

**Yes. For future actions or deliverables, the status textboxes allow you to report on actions that are ahead of schedule. There are also textboxes at the end of the self-assessment to add any additional information if you want to explain your MS4 activities further. Many municipalities use this as a way to highlight the work that has been done over the past year for funding purposes or other stormwater work not specifically required by the permit.**

**Annual Reports don't just need to be for EPA; they can be used to summarize and highlight local stormwater work over the last year to share with community leaders and with citizens.**

In the NOI, we list BMPs for each MCM over the course of the permit term. In the annual report, should we only list the BMPs that were completed in the permit year?

**Basically, yes. In the annual report you are telling EPA how you complied with the permit over the last year. Some places in the annual report may ask you to report progress made in the past year on actions or deliverables due later in the permit term, but you do not need to forecast what you will be doing in the future. Your Stormwater Management Program is the appropriate place to keep track of future actions and planned activities.**

What do we submit with our annual reports? Do we send in our SWMP? Do we send in the brochures that we use for outreach?

**You are only required to submit additional information if the annual report form prompts you to indicate attached information or provide a web address. For example, you should attach or provide a web link to the results from any outfall screening during the reporting period. You do not need to send in your stormwater management program documents, although please**

provide a web link if available online (see Page 1 of the annual report form). You do not need to send in public education examples that you've used; please keep a copy of this information with your SWMP for your own recordkeeping purposes.

How should we fill out check boxes that do not apply to our MS4? For example, we do not have a lake or a pond phosphorus TMDL to follow.

The beginning of the Self Assessment section prompts you to check off which impairment and TMDL requirements apply to your MS4:

**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>*

<b>Impairment(s)</b>			
<input checked="" type="checkbox"/> Bacteria/Pathogens	<input type="checkbox"/> Chloride	<input type="checkbox"/> Nitrogen	<input type="checkbox"/> Phosphorus
<input type="checkbox"/> Solids/ Oil/ Grease (Hydrocarbons)/ Metals			
<b>TMDL(s)</b>			
<i>In State:</i>	<input type="checkbox"/> Assabet River Phosphorus	<input type="checkbox"/> Bacteria and Pathogen	<input checked="" type="checkbox"/> Cape Cod Nitrogen
	<input type="checkbox"/> Charles River Watershed Phosphorus	<input type="checkbox"/> Lake and Pond Phosphorus	
<i>Out of State:</i>	<input type="checkbox"/> Bacteria/Pathogens	<input type="checkbox"/> Metals	<input type="checkbox"/> Nitrogen
			<input type="checkbox"/> Phosphorus
<input type="button" value="Clear Impairments and TMDLs"/>			

Once you do, the appropriate compliance checkboxes will be populated below the Year 2 and Annual Requirements. From there, you can check off which requirements you have completed related to your applicable impairments and TMDLs. If you see impairment or TMDL requirements in the form that do not apply to your MS4, look again at the impairment and TMDL check boxes at the beginning of the self-assessment to make sure they accurately reflect your specific requirements.

How can we add our attachments to the annual report? Is a web link, if applicable, preferred or would EPA like to see each of the documents as a single attachment?

You only need to provide documents for additional information that is requested in the Annual Report. There are a few options for how you can provide these documents. You can:

- 1) attach additional information files to your submission email with the annual report. Attach each document, including the annual report PDF, separately to the submission email. Please do not combine PDFs or other files with the annual report file into a single file;

**2) include a web link to the additional information files requested when prompted in the Annual Report. This is a good option if the documents are already housed in your stormwater management plan online or on your town website where people can access it, or for attachments that are too large to share via email; or,**

**3) do a combination of 1 and 2 for different requirements. For example, maybe your IDDE sampling information is already online but you would like to attach a document describing catchment investigations. As long as we can access all of the necessary documents, whatever works best for your municipality is okay.**

If a task, such as a complete inspection of stormwater treatment structures, is a work of progress, is there a place to indicate that?

**Yes, that would be in your self-assessment. If you didn't get to all your treatment structures, you would not check the box that you've completed it. You would describe progress made on this requirement in the expandable textbox below the checkboxes.**

If one of the requirements was completed after June 30, 2021 but before we submit our Annual Report, can we check it off as complete in this annual report?

**No, do not check off any requirements not completed during the reporting period. You can use the optional additional information textbox below the checkboxes to let EPA know about the progress you made during the reporting period on that requirement and to report that you completed the requirement outside of the reporting period.**

Does the data completion include posting to the website? We have completed several pieces that we intend to have posted to the website upon completion of the annual report and then ongoing. Some of the communication was completed within the permit year. However, it was not posted to the website at that time.

**If you have completed it in the reporting year, then you are able to report that you've completed it in the Annual Report. Depending on what requirement it is, you may need to submit an attachment of the data or provide a web link to it as part of the annual report.**

**However, in the case of public education, if your message is intended for web posting and has not been posted to the web during the reporting period, then you have not delivered that educational message to the public during the reporting year. Be sure to report on it in next year's annual report when it is posted to the web.**

If all of the requested information in the annual report is in our SWMP, can we just say "see SWMP"?

**For some items, such as when EPA is asking for additional data (e.g. IDDE, SSO, catchment investigations), you can attach or provide a link to the SWMP where the information is kept.**

**However, we are also expecting MS4 operators to provide specific information about progress made over the past year in the annual report. Where EPA is asking for specific metrics (e.g. public education messages, SSO removals, construction site inspections performed, etc.) we expect the MS4 operator to report that information directly in the form.**

As my town continues its stormwater management program, some of our information changes each year. For example, as we complete our catchment and outfall investigations, we update that data as well as our mapping information. As that data changes, should we discuss those changes in the annual report and if so, where in the annual report template should that information occur?

**Yes, the annual report should provide a snapshot of the data you have collected for your MS4 at the end of each reporting period. EPA expects this information to change and expand over the course of the permit term. If you don't see a specific location on the form prompting the updated information, you can add it to the optional textboxes asking for additional information.**