



# TOWN OF BURLINGTON

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DEPARTMENT OF PUBLIC WORKS

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MAY 26 2006

May 22, 2006

United States Environmental Protection Agency  
Water Technical Unit  
P.O. Box 8127  
Boston, Massachusetts 02114

**Annual Report - Reporting Period May 1, 2005 to May 1, 2006**  
**Town of Burlington - Storm Water Management Program**

To: Environmental Protection Agency

Attached to this transmittal letter is the Annual Report for the Town of Burlington's Storm Water Management Program for the reporting period May 1, 2005 to May 1, 2006.

This report combined with this transmittal letter constitutes a self-assessment review of compliance with the permit conditions. The attached report is constructed in table format to facilitate review of the progress on each Best Management Practice. The table contains a(n):

- assessment of the appropriateness of the selected BMPs
- assessment of the progress toward achieving the measurable goals
- summary of results of any information collected to date
- discussion of activities for the next reporting cycle
- discussion of any changes in identified BMPs or measurable goals

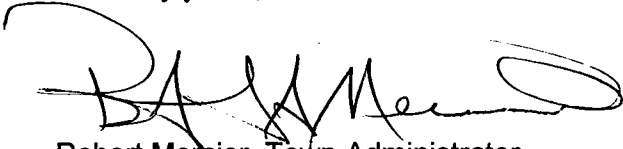
The Town of Burlington accomplished the following major activities during the 3rd permit year:

- finalized and distributed (mailed) fact sheet / brochure to all Town businesses on storm water pollution
- held third annual SWMC meeting
- completed the checking of GIS database for mapping of Town storm water system
- developed draft illicit discharge and detection bylaw
- developed draft erosion and sedimentation control bylaw for both construction and post-construction periods

- presented to and reviewed draft illicit discharge and erosion and sedimentation control bylaws with Planning Board, Board of Health, Conservation Commission, Board of Selectmen, and Town Bylaw Review Committee. Draft bylaws have also been reviewed by Town Counsel. Final drafts of proposed bylaws are now being prepared. Final review and approval by various Town Boards and Committees and Town Meeting is scheduled for the 4th permit year.

If you have any questions or comments regarding the above or the attached annual report, please contact Syamal Chaudhuri, DPW Superintendent, at Tel (781) 270-1670.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Robert Mercier", with a large, sweeping flourish at the end.

Robert Mercier, Town Administrator  
Town of Burlington, Massachusetts

**Public Education and Outreach - Annual Report**  
**Town of Burlington - Storm Water Management Program**  
**Reporting Period: May 1, 2005 to May 1, 2006**

| <b>BMP ID #</b> | <b>BMP Description</b>                                  | <b>Measurable Goal</b>   | <b>Progress Toward Achieving Goals</b>  | <b>BMP Still Approp 'yes / no'</b> | <b>Activities for 4 th Reporting Cycle</b>                      | <b>Changes Req'd in BMP 'Yes / No'</b> | <b>Comments, Notes, and/or Summary of Results</b>   |
|-----------------|---|--|---|------------------------------------|---|--|---|
| 1 - 1           | Develop brochure and / or fact sheet for homeowners     | Final drafts - 1st yr; review by SWMC; distribute 2nd year                                   | Extensive research done to identify resources materials. Pamphlet for homeowner has been drafted and reviewed by SWMC. Edits were incorporated. Brochure was mailed to all residents within Town.               | Yes                                | None - completed  | No                                     | Completed - Brochure addresses 'What is storm water pollution', 'What you can do', auto maintenance, yard work, herbicides and pesticides, landscaping, and painting.   |
| 1 - 2           | Develop brochure and fact sheet for sector businesses   | Draft within 2nd year; review by SWMC; distribute 3rd year                                   | Draft brochure for business sectors was reviewed by BOH staff for food service facilities and finalized. Brochure was formatted, printed, addressed and mailed to all businesses within the Town of Burlington. | Yes                                | Incorporate final changes and mailed to all businesses in Town. | No                                     | Brochure addresses:<br>- general best practices for all<br>- landscape contractors<br>- food service facilities<br>- automotive repair shops  |
| 1 - 3           | Collect / assemble educational materials for school use | Discuss with schools and collect materials 3rd year; implement into curriculum in 4th yr     | Efforts were made to identify educational materials for school use during 1 <sup>st</sup> and 2 <sup>nd</sup> permit years.   | Yes                                | Additional search for resources                                 | Maybe                                  | Adequate resource materials not identified (except for EPA placemat and stickers). A meeting was held in May 2006 with EPA personnel. EPA agreed to send a resource disk with additional materials that may be useful to schools. Additional efforts will be made to identify educational materials in the 4 <sup>th</sup> year. Also, this curricula topic may not be a priority for schools compared with other objectives. |
| 1 - 4           | Place educational materials for BMPs 1-3 in library     | If suitable materials found, discuss with library and place materials in library in 4th year | Some materials identified. Additional materials will be researched during the 4th year as per BMP 1.3.  | Yes                                | Implement BMP1-3  | No                                     | Intent was to place educational materials for children in library. If resources are identified, this will be done (as per BMP 1-3).   |

|       |  |  |   |     |                          |    |  |
|-------|--|--|---|-----|--------------------------|----|--|
| 1 - 5 | Add storm water information and links to Town web site     | Convert materials to pdf format in 4th yr; develop web pg 5th yr | No progress during this reporting period.   | Yes | Identify web references. | No | Additional resources needed for labor to generate a new web page. This activity may be budget constrained. |
| 1 - 6 | Publicize SWMC meetings for public education opportunities | Conduct at least 4 public meetings in 5 years                    | 3rd Annual SWMC meeting held in first quarter 2006. Press releases were issued to local newspapers. | Yes | Will continue            | No | —  |

**Public Involvement and Participation - Annual Report**  
**Town of Burlington - Storm Water Management Program**  
**Reporting Period: May 1, 2005 to May 1, 2006**

| <b>BMP ID #</b> | <b>BMP Description</b>   | <b>Measurable Goal</b>  | <b>Progress Toward Achieving Goals</b>  | <b>BMP Still Approp 'yes / no'</b> | <b>Activities for Next Reporting Cycle</b>               | <b>Changes Req'd in BMP 'Yes / No'</b> | <b>Comments, Notes, and/or Summary of Results</b>  |
|-----------------|--|---|---|------------------------------------|--|--|--|
| 2 - 1           | Document existing public involvement opportunities   | Summarize in 1st annual report  | No activity   | No                                 | None   | Yes                                    | Summary of existing public involvement opportunities(BMP 2-1) is not useful, since these opportunities are now being created under the EPA permit (i.e., Annual SWMC meeting, hearings on new bylaws, etc). This BMP will not be continued.  |
| 2 - 2           | Publicize participation opportunities with Shawsheen, Mystic River, and Ipswich Watershed Associations | Monitor publicity generated in local newspapers during permit term. Provide assistance to ensure publicity if needed. | No activity   | Yes                                | Continue monitoring for publicity of appropriate events. | No                                     | Activities of the Shawsheen, Mystic River, and Ipswich Watershed Associations are periodically publicized in the local newspaper. Further effort under this permit to publicize these activities is redundant and not needed. We will monitor to ensure that events are publicized and assist if needed. |
| 2 - 3           | Plan and implement projects with High School environmental group                                       | Develop plan and implement projects during 4th and 5th years of permit  | Initial conversations were held with Dr. David Luther at High School - Environmental Science program and leader of Students for Environmental Action club. Dr. Luther has retired. No contact with the school has been made during this period. | Maybe                              | On hold  | No                                     | Efforts on this BMP have been delayed to the 4th and 5th permit term. This BMP is deemed to have lower priority due to logistics of coordinating and / or supervising high school students to ensure effectiveness.  |
| 2 - 4           | Publicize SWMC meetings for opportunities for public involvement                                       | Maintain copies of publicity in file over 5 year permit term  | 3 <sup>rd</sup> Annual SWMC meeting held first quarter 2006. Press releases were issued to local newspapers.  | Yes                                | Will continue  | No                                     | ---  |

|       |  |  |   |     |              |    |             |
|-------|--|--|---|-----|--------------|----|-------------|
| 2 - 5 | Issue press releases when storm water materials in library | Maintain copies of publicity in file over 5 yr permit term | Efforts were made to identify educational materials for school use during 1st and 2nd permit year. These resources would also be placed in the library. Adequate resource materials not identified (except for EPA placemat and stickers). Additional efforts will be made to identify educational materials; delay until 4th year. | Yes | Will be done | No | See BMP 1-4 |
|-------|--|--|---|-----|--------------|----|-------------|

**Illicit Discharge Detection and Elimination - Annual Report**

Town of Burlington - Storm Water Management Program

Reporting Period: May 1, 2005 to May 1, 2006

| <b>BMP ID #</b> | <b>BMP Description</b>   | <b>Measurable Goal</b>   | <b>Progress Toward Achieving Goals</b>                                | <b>BMP Still Approp 'yes / no'</b> | <b>Activities Next Reporting Cycle</b>               | <b>Changes Req'd in BMP 'Yes / No'</b> | <b>Comments, Notes, and/or Summary of Results</b>   |
|-----------------|--|--|---|------------------------------------|--|--|---|
| 3 - 1           | Map storm water system and outfall locations   | Complete map and outfall database by end of 2nd permit year  | The GIS mapping and outfall database is now complete.                 | Yes                                | Some manual checking of mapping database will occur. | No                                     | Completed during 2nd permit year. Work left on mapping such as corrections to flow direction and the addition of some outfall locations was finished.   |
| 3 - 2           | Finish map database and assign names for tributaries that discharge into named waterbodies | Finalize database in 2nd year; submit revised waterbodies list to EPA / DEP as permit modification if needed; and update mapping database in 3rd and 5th years from manual checking selected data. | Completed - GIS mapping and outfall database is 100 percent complete. | Yes                                | Submit information as needed to EPA.                 | No                                     | Completed during 2nd permit year.   |
| 3 - 3           | Develop sampling and analysis plan for dry weather flows                                   | Plan completed in year 1.  | Completed   | Yes                                | None   | No                                     | Completed - A plan was developed during 1st permit year to sample 5 locations of dry weather flows detected during the mapping field verification. Two samples were collected from each location. |
| 3 - 4           | Visually inspect outfalls for dry weather flows  | Selective inspection 1st & 2nd year; spot inspection yrs 3-5, inspection records in program file   | Town-wide inspection for first year was completed.                    | Yes                                | Selected inspections will be done if needed          | No                                     | Completed - A field check of the entire town was completed as part of field verification to support the mapping activity. Five (5) outfalls were identified as having dry weather flows.          |

|        |   |  |  |     |  |    |  |
|--------|---|--|--|-----|--|----|--|
| 3 - 5  | Conduct sampling at outfalls with dry weather flows                                     | Conduct sampling - selected outfalls in 1st yr; selected additional sampling in years 3 & 5 if needed; results in program file | Sampling and analysis activities were completed at 5 outfall locations during 1st permit year.   | Yes | Will be done if needed   | No | Each outfall location was sampled for bacteria, ammonia, surfactants, conductivity, and fluorides. Since no flowing water was occurring at 4 of 5 sites, samples of standing water at the mouth of pipe were taken. Based on these results, no illicit connections are believed to exist at these locations. |
| 3 - 6  | Develop training materials for DPW / others for illicit discharge                       | Develop training materials 4th year  | No activity during this year   | Yes | None   | No | Rescheduled for completion in 4th year.  |
| 3 - 7  | Review current bylaws / regs relevant to illicit discharge - Burlington and other towns | Review to be completed in 1st year   | Substantially complete   | Yes | Identify additional materials  | No | Extensive effort was made during the 1st permit year to identify bylaws in use by other districts (nationwide). Bylaws have been obtained that will serve as a model for Burlington's adoption and implementation of an illicit discharge bylaw. A review of these bylaws has been completed.                |
| 3 - 8  | Develop bylaw to prohibit illicit discharge   | Develop draft bylaw in 3rd year and brought to Town Meeting in 4th year for approval   | Draft bylaw has been presented to Planning Board, Board of Health, Conservation Commission, Board of Selectmen, and Town Bylaw Review Committee. Draft bylaw has also been reviewed by Town Counsel. | Yes | Hold meetings with Town Departments to arrive at a consensus on implementation logistics for a new bylaw | No | Comments by Town Boards and Committees have been incorporated. A full draft of a proposed bylaw is now being prepared. Final review by various Town Boards and Committees will occur during the 4 <sup>th</sup> year. Town meeting approval of bylaw is scheduled for the 4th year.                          |
| 3 - 9  | Develop illicit discharge and detection plan  | Draft plan scheduled for completion in 4th year; final plan to be completed 5th year   | No activity during this reporting period.  | Yes | Draft plan to be completed during the coming year  | No | Finalization of plan has been scheduled for the 5th year.  |
| 3 - 10 | Train DPW personnel to recognize illicit discharges                                     | Train DPW / others in 5th year (which is after BMP 3-9 completed).   | No activity scheduled for this reporting period.   | Yes | None   | No | Delayed until 5th year since it depends on completing BMP 3-9.   |
| 3 - 11 | Implement discharge and detection plan  | Plan will be implemented in year 5 and will be documented by records of activities relative illicit discharge and detection.   | No activity scheduled for this reporting period.   | Yes | None   | No | First implementation of illicit discharge and detection has been scheduled for 5th year.   |



**Construction Site Storm Water Runoff Control - Annual Report**

Town of Burlington - Storm Water Management Program

Reporting Period: May 1, 2005 to May 1, 2006

| <b>BMP ID #</b> | <b>BMP Description</b>  | <b>Measurable Goal</b>   | <b>Progress Toward Achieving Goals</b>   | <b>BMP Still Approp 'yes / no'</b> | <b>Activities for Next Reporting Cycle</b>  | <b>Changes Req'd in BMP 'Yes / No'</b> | <b>Comments, Notes, and/or Summary of Results</b>  |
|-----------------|---|--|--|------------------------------------|---|--|--|
| 4 - 1           | Collect and summarize other towns' sedimentation and erosion control bylaws                       | Sample bylaws collected, will be put in file for review.   | Extensive effort to identify other districts' bylaws as a model has been completed. Review of these bylaws has been completed. | Yes                                | Continue review of other districts' bylaws. | No                                     | Substantially complete - To be continued during other permit years as new materials are identified.  |
| 4 - 2           | Summarize existing bylaws and regs within Burlington for evaluating storm water impacts           | Summary memo to file (completed in 1st year)   | Not completed  | No                                 | None scheduled                              | Yes                                    | Put on hold - The MA State Wetlands Protection Act and Burlington Bylaw Articles XIV (Wetlands Protection) are the main regulations that offer evaluation of storm water impacts. These regulations are well known to Town residents. An additional summary memo would not provide any significant additional value. |
| 4 - 3           | Conduct meetings with various stakeholders in Town to obtain input regarding bylaw implementation | Notes summarizing the results of these meetings (completed in 1st or 2nd year) in the form of minutes of meeting taken during Annual SWMC meeting. | Some discussions have been done with members of the Stormwater Management Committee (which represents other Boards in Town).   | Yes                                | Ongoing                                     | No                                     | Additional meetings with various Town Boards and Committees have been held during the 3 <sup>rd</sup> permit year and will continue during the 4 <sup>th</sup> permit year (as presentation of draft bylaw ... see BMP 4-4 and 5-4)  |

|       |   |  |  |     |  |    |   |
|-------|---|--|--|-----|--|----|---|
| 4 - 4 | Develop draft sedimentation and erosion control bylaw and obtain final approval | Develop draft bylaw in 3rd year and brought to Town Meeting in 4th year for approval | Draft bylaw has been presented to Planning Board, Board of Health, Conservation Commission, Board of Selectmen, and Town Bylaw Review Committee. Draft bylaw has also been reviewed by Town Counsel. | Yes | Hold meetings with Town Departments to arrive at a consensus on implementation logistics for a new bylaw | No | Comments by Town Boards and Committees have been incorporated. A full draft of a proposed bylaw is now being prepared. Final review by various Town Boards and Committees will occur during the 4 <sup>th</sup> year. Town meeting approval of bylaw is scheduled for the 4th year. |
| 4 - 5 | Develop site inspection checklists to support bylaw implementation              | Draft checklists completed in 5th year   | No activity scheduled for this reporting period  | Yes | To be done in 5th permit year. No activity scheduled for the next reporting period.                      | No | ---   |

**Post Construction Stormwater Management - Annual Report**

Town of Burlington - Storm Water Management Program

Reporting Period: May 1, 2005 to May 1, 2006

| <b>BMP ID #</b> | <b>BMP Description</b>  | <b>Measurable Goal</b>   | <b>Progress Toward Achieving Goals</b>   | <b>BMP Still Approp 'yes / no'</b> | <b>Activities for Next Reporting Cycle</b>  | <b>Changes Req'd in BMP 'Yes / No'</b> | <b>Comments, Notes, and/or Summary of Results</b>  |
|-----------------|---|--|--|------------------------------------|---|--|--|
| 5 - 1           | Collect and summarize other towns' sedimentation and erosion control bylaws for post construction control               | Sample bylaws collected, will be put in file for review.   | Extensive effort to identify other districts' bylaws as a model has been completed. Review of these bylaws has been completed. | Yes                                | Continue review of other districts' bylaws. | No                                     | Substantially complete - To be continued during other permit years as new materials are identified.  |
| 5 - 2           | Summarize existing bylaws and regs within Burlington for eval stormwater impacts for post construction control          | Summary memo to file (completed in 1st year to be done with BMP 4-2)   | Not completed  | No                                 | None scheduled                              | Yes                                    | Put on hold - The MA State Wetlands Protection Act and Burlington Bylaw Articles XIV (Wetlands Protection) are the main regulations that offer evaluation of storm water impacts. These regulations are well known to Town residents. An additional summary memo would not provide any significant additional value. |
| 5 - 3           | Conduct meetings with various stakeholders in Town to solicit input on implementing bylaw for post construction control | Notes summarizing the results of these meetings (completed in 1st or 2nd year) in the form of minutes of meeting taken during Annual SWMC meeting. | Some discussions have been done with members of the Stormwater Management Committee (which represents other Boards in Town).   | Yes                                | Ongoing                                     | No                                     | Additional meetings with various Town Boards and Committees have been held during the 3 <sup>rd</sup> permit year and will continue during the 4 <sup>th</sup> permit year (as presentation of draft bylaw ... see BMP 4-4 and 5-4)  |

|       |   |  |  |     |  |    |   |
|-------|---|--|--|-----|--|----|---|
| 5 - 4 | Develop draft sedimentation and erosion control bylaw and obtain final approval for post construction control | Develop draft bylaw in 3rd year and brought to Town Meeting in 4th year for approval | Draft bylaw has been presented to Planning Board, Board of Health, Conservation Commission, Board of Selectmen, and Town Bylaw Review Committee. Draft bylaw has also been reviewed by Town Counsel. | Yes | Hold meetings with Town Departments to arrive at a consensus on implementation logistics for a new bylaw | No | Comments by Town Boards and Committees have been incorporated. A full draft of a proposed bylaw is now being prepared. Final review by various Town Boards and Committees will occur during the 4 <sup>th</sup> year. Town meeting approval of bylaw is scheduled for the 4th year. |
| 5 - 5 | Develop site inspection checklists to support bylaw implementation for post construction control              | Draft checklists completed in 5th year   | No activity scheduled for this reporting period  | Yes | To be done in 5th permit year. No activity scheduled for the next reporting period.                      | No | —   |

**Pollution Prevention and Good Housekeeping - Annual Report**

Town of Burlington - Storm Water Management Program

Reporting Period: May 1, 2005 to May 1, 2006

| <b>BMP ID #</b> | <b>BMP Description</b>   | <b>Measurable Goal</b>                                     | <b>Progress Toward Achieving Goals</b>                      | <b>BMP Still Approp 'yes / no'</b> | <b>Activities for Next Reporting Cycle</b>                     | <b>Changes Req'd in BMP 'Yes / No'</b> | <b>Comments, Notes, and/or Summary of Results</b>  |
|-----------------|--|--|---|------------------------------------|--|--|--|
| 6 - 1           | Summarize existing procedures within Burlington for preventing pollution from parks/open space, fleet, storage yards, roads/parking lots, and storm sewer maintenance activities                             | Summary memo to file (to be completed in 4th year)         | Work has begun to identify and collect existing procedures. | Yes                                | Complete activity to identify and collect existing procedures. | No                                     | Rescheduled for completion in 4th year. Requires interviews with various town personnel. |
| 6 - 2           | Summarize existing Town of Burlington programs for preventing pollution (including Recycling, Haz Waste Collection, mercury recycling, activities of stream cleaning committee, and stream cleaning program) | Summary memo to file (completed in 4th year)               | Work has begun to assemble materials for this activity.     | Yes                                | Complete summary of existing Town of Burlington programs       | No                                     | Rescheduled for completion in 4th year. Requires interviews with various town personnel. |
| 6 - 3           | Develop and promulgate procedures (as needed) for controlling pollutant discharges from the maintenance of parks and open space  | Procedures drafted in 4th year and implemented in 5th year | No activity.  | Yes                                | Draft procedures during 4th year.                              | No                                     | Rescheduled for completion in 4th and 5th years  |
| 6 - 4           | Develop and promulgate procedures (as needed) for controlling pollutant discharges from the maintenance of vehicle fleet   | Procedures drafted in 4th year and implemented in 5th year | No activity.  | Yes                                | Draft procedures during 4th year.                              | No                                     | Rescheduled for completion in 4th and 5th years  |
| 6 - 5           | Develop and promulgate implement procedures (as needed) for controlling pollutant discharges from the maintenance of storage yards   | Procedures drafted in 4th year and implemented in 5th year | No activity.  | Yes                                | Draft procedures during 4th year.                              | No                                     | Rescheduled for completion in 4th and 5th years  |

|       |  |  |   |     |  |    |   |
|-------|--|--|---|-----|--|----|---|
| 6 - 6 | Develop and promulgate procedures (as needed) for controlling pollutant discharges from the maintenance of streets and parking lots                          | Procedures drafted in 4th year and implemented in 5th year                                   | No activity.  | Yes | Draft procedures during 4th year.                    | No | Rescheduled for completion in 4th and 5th years |
| 6 - 7 | Develop and promulgate procedures (as needed) for controlling pollutant discharges from the maintenance of storm sewer system                                | Procedures drafted in 4th year and implemented in 5th year                                   | No activity.  | Yes | Draft procedures during 4th year.                    | No | Rescheduled for completion in 4th and 5th years |
| 6 - 8 | Develop training materials for controlling pollutant discharges from operation and maintenance activities by town personnel                                  | Training materials to be drafted in 5th year   | No activity. Not scheduled for this reporting period. | Yes | No activity scheduled for the next reporting period. | No | Rescheduled for completion in 5th year.         |
| 6 - 9 | Finalize training materials and implement training sessions for controlling pollutant discharges from operation and maintenance activities by town personnel | Training materials to be finalized in 5th year and training sessions implemented in 5th year | No activity. Not scheduled for this reporting period. | Yes | No activity scheduled for the next reporting period. | No | Rescheduled for completion in 5th year          |

**BMPs for Meeting TMDL - Annual Report**  
 Town of Burlington - Storm Water Management Program  
 Reporting Period: May 1, 2005 to May 1, 2006

| <b>BMP ID #</b> | <b>BMP Description</b>   | <b>Measurable Goal</b>  | <b>Progress Toward Achieving Goals</b>           | <b>BMP Still Approp 'yes / no'</b> | <b>Activities for Next Reporting Cycle</b>           | <b>Changes Req'd in BMP 'Yes / No'</b> | <b>Comments, Notes, and/or Summary of Results</b>   |
|-----------------|--|---|--|------------------------------------|--|--|---|
| 7 - 1           | Continue street sweeping program   | Priority to be given in both frequency and priority to Butterfield Pond, Vine Brook, Sandy Brook, and Long Meadow Brook to reduce turbidity (implemented in all 5 years); budget avail for review | Ongoing  | Yes                                | Continue program                                     | No                                     | ---   |
| 7 - 2           | Implement illicit discharge & detection plan   | Priority given to Long Meadow Brook and Sandy Brook areas which are impaired with pathogens and have TMDLs (to be implemented in 5th year). Records of activity to be placed in program file      | No activity scheduled for this reporting period. | Yes                                | No activity scheduled for the next reporting period. | No                                     | First implementation of illicit discharge and detection plan will not occur until the 5th year. |
| 7 - 3           | Implement Control Measures 6-3 to 6-7 to reduce pathogen load and other pollutants contributed by storm sewers to Vine Brook, Sandy Brook and Long Meadow Brook. (repeat from above) | Procedures drafted and implemented in 5th year  | No activity during this reporting period         | Yes                                | Draft procedures during 5th year.                    | No                                     | Rescheduled for completion in 5th year  |
| 7 - 4           | Develop surface water sampling plan (both source and in-stream) for fecal coliform on Vine Brook, Sandy Brook, and Long Meadow Brook (impaired streams)                              | Develop plan in 5 <sup>th</sup> year  | Not scheduled for this reporting period.         | Yes                                | No activity scheduled for the next reporting period. | No                                     | ---   |
| 7 - 5           | Implement surface water sampling plan  | Conduct sampling in 5th year  | Not scheduled for this reporting period.         | Yes                                | No activity scheduled for the next reporting period. | No                                     | ---   |