

Year 1 Annual Report
Massachusetts Small MS4 General Permit
Reporting Period: May 1, 2018-June 30, 2019

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.

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:

Fax 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 and an explanation of why it is not posted on the web:

Part II: Self Assessment

First, in the box below, select the impairment(s) and/or TMDL(s) that are applicable to your MS4.

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 1 Requirements

- Develop and begin public education and outreach program
- Identify and develop inventory of all known locations where SSOs have discharged to the MS4 in the last 5 years
 - The SSO inventory is attached to the email submission
 - The SSO inventory can be found at the following website:

<https://www.needhamma.gov/323/Stormwater-Management>
- Develop written IDDE plan including a procedure for screening and sampling outfalls
- IDDE ordinance complete
- Identify each outfall and interconnection discharging from MS4, classify into the relevant category, and priority rank each catchment for investigation
 - The priority ranking of outfalls/interconnections is attached to the email submission
 - The priority ranking of outfalls/interconnections can be found at the following website:

<https://www.needhamma.gov/323/Stormwater-Management>
- Construction/ Erosion and Sediment Control (ESC) ordinance complete
- Develop written procedures for site inspections and enforcement of sediment and erosion control measures
- Develop written procedures for site plan review
- Keep a log of catch basins cleaned or inspected
- Complete inspection of all stormwater treatment structures

Annual Requirements

- Annual opportunity for public participation in review and implementation of SWMP
- Comply with State Public Notice requirements
- 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
- All curbed roadways have been swept a minimum of one time per year

Bacteria/ Pathogens (Combination of Impaired Waters Requirements and TMDL Requirements as Applicable)

Annual Requirements

*Public Education and Outreach**

- Annual message encouraging the proper management of pet waste, including noting any existing ordinances where appropriate
- Permittee or its agents disseminate educational material to dog owners at the time of issuance or renewal of dog license, or other appropriate time
- Provide 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)*

Solids, Oil and Grease (Hydrocarbons), or Metals

Annual Requirements

Good Housekeeping and Pollution Prevention for Permittee Owned Operations

- Increase street sweeping frequency of all municipal owned streets and parking lots to a schedule to target areas with potential for high pollutant loads
- Prioritize inspection and maintenance for catch basins to ensure that no sump shall be more than 50 percent full; Clean catch basins more frequently if inspection and maintenance activities indicate excessive sediment or debris loadings

Charles River Watershed Phosphorus TMDL

- Begin Phase 1 Phosphorus Control Plan (PCP)

Use the box below to input additional details on any unchecked boxes above or any additional information you would like to share as part of your self assessment:

Needham is working on additional funding to hire a contractor to perform a one-time complete catch basing cleaning throughout town in a single round to facilitate the determination if there are any catch basins that are likely to require more frequent cleaning (>50% full) outside of the predetermined cleaning route. The current internal catch basin cleaning program addresses approximately 50% of town-wide catch basins per year on a rotating cleaning schedule. This effort will help to identify those catch basins that may require more frequent cleaning and/or areas that may benefit from additional mitigation efforts resulting in improved stormwater management.

The written Stormwater Management Program (SWMP) was completed September 23, 2019 and posted to the town website on September 27, 2019 for a public review and comment period of 60 days. Following the

public review period, all comments to the document will be collected, categorized and reviewed by the Stormwater Committee to determine those comments which are most impactful and will improve or clarify the SWMP. The revised SWMP, if applicable, document will be available both electronically and in print within one (1) month following this review process.

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:

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 the reporting period:

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

BMP:Management of Pet Waste

Message Description and Distribution Method:

Proper care and disposal of pet waste and the environmental impacts of not conforming to Needham's bylaw 3.7.7. Brochure available on website and provided to each resident with request for pet licensing/renewal as of April 2019.

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

Facebook (428); Twitter (751); Brochures available at Public Works and Town Clerk for Public; Website

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:Septic System Care

Message Description and Distribution Method:

Distributed to all new applicants for septic system in town. Describes the proper care and maintenance of a septic system.

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

Distributed with Septic System Permits (8); Brochures available at Health Department

Message Date(s): 5/1/18 - 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:Lawn & Garden Tips

Message Description and Distribution Method:

Posted on Facebook and Twitter. Proper use of chemicals such as fertilizer and pesticides.

Targeted Audience: Residents

Responsible Department/Parties: DPW Operations

Measurable Goal(s):

Facebook 495; Twitter (20,100)

Message Date(s): 5/9/19

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:Leaf Collection and Disposal

Message Description and Distribution Method:

Posted on Facebook, Twitter and on Town Website. Proper disposal and care of leaves during fall clean-up and throughout the season.

Targeted Audience: Residents

Responsible Department/Parties: DPW Operations

Measurable Goal(s):

Facebook (232); Twitter (495); Website

Message Date(s): 11/1/18

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: Think Blue: Fowl Water 2019

Message Description and Distribution Method:

Think Blue Massachusetts "Fowl Water" video (<https://www.thinkbluemassachusetts.org/>)
Advertisement on Facebook, Instagram, & YouTube

Targeted Audience: Residents

Responsible Department/Parties: DPW Operations

Measurable Goal(s):

Facebook/Instagram 17,410; You Tube 16,654; social media impressions from residents of Needham.

Message Date(s): 6/23/19-6/30/19

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: Paint Surplus Days

Message Description and Distribution Method:

Notification of RTS acceptance of paint surplus supplies to be collected for appropriate disposal.

Targeted Audience: Residents

Responsible Department/Parties: DPW Operations

Measurable Goal(s):

Twitter (4,392)

Message Date(s): 5/17/18, 6/12/18, 7/19/18, 10/19/18, 4/18/19, 5/17/19, 6/13/19

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:Household Hazardous Waste Day

Message Description and Distribution Method:

Information about the hazardous materials accepted at the RTS on this annual collection day. Materials are collected and removed by a contractor for proper handling and disposal.

Targeted Audience: Residents

Responsible Department/Parties: DPW Operations

Measurable Goal(s):

Twitter (618)

Message Date(s): 10/4/18

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:Clear-a-Basin

Message Description and Distribution Method:

Communication regarding the importance of keeping catch basins clear of debris.

Targeted Audience: Residents

Responsible Department/Parties: DPW Operations

Measurable Goal(s):

Twitter (5,531)

Message Date(s): 10/29/18, 11/9/18, 1/23/19

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 the reporting period:

The SWMP was completed in September 2019 and is currently in public review status. Comments and revisions, if applicable, will be reported during the next reporting period.

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

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

Public participation opportunities for this reporting period included:

4/28/2019	CRWA	Run of the Charles
5/19/18 - 6/15/2019	RTS	Paint Collection
10/6/2018	RTS	Household Hazardous Waste Day
5/2/2019	Park and Recreation	Restock the Reservoir
11/4-25/2018	RTS	Leaf Collection
5/1/18 - 6/30/19	DPW	Stormwater Plaque Placement

MCM3: Illicit Discharge Detection and Elimination (IDDE)

Sanitary Sewer Overflows (SSOs)

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:

Below, report on the total number of SSOs identified in the MS4 system and removed to date. At a minimum, report SSOs identified since 2013.

Total number of SSOs identified:

Total number of SSOs removed:

MS4 System Mapping

Describe the status of your MS4 map, including any progress made during the reporting period:

The MS4 map is reviewed annually and updated accordingly. There were no changes to the mapping area during this reporting period. The current map is located at <https://www.needhamma.gov/323/Stormwater-Management>.

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.

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

<https://www.needhamma.gov/323/Stormwater-Management>

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

Number of outfalls screened:

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

Percent of total outfalls screened:

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.

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

<https://www.needhamma.gov/323/Stormwater-Management>

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:

Catchment investigations are conducted as part of the current CCTV inspection program to identify illicit connections. The CCTV inspection program is an ongoing program to inspect 10% of the Town's drainage system every year. The program has proven to be successful in identifying illicit connections and in the future will use composite sampling results to target inspection efforts.

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.

- The illicit discharge removal report is attached to the email submission
- The illicit discharge removal report can be found at the following website:

<https://www.needhamma.gov/323/Stormwater-Management>

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 [UNITS]

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.

Total number of illicit discharges identified: 0

Total number of illicit discharges removed: 0

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

Illicit discharges identified and were removed prior to this permit effective date.

Employee Training

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

Employee training occurred during the reporting period on the following dates:

12/18/18	MS4 Permit Overview & IDDE Training
1/29/19	Good Housekeeping - Municipal Facilities O&M
4/26/19	Good Housekeeping - Municipal Facilities O&M
5/14/19	Good Housekeeping - Municipal Facilities O&M
6/11/19	NPDES MS4 Training Summary

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: 16

Number of inspections completed: 32

Number of enforcement actions taken:

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

Ordinance Development

Describe the status of the post-construction ordinance required to be complete in year 2 of the permit term:

The Town proposed a stormwater bylaw to establish standards to promote the removal of pollutants from stormwater, encourage recharging of stormwater, develop methods to maintain functional operation of stormwater BMPs, and improve stormwater quality in the environment. The bylaw was approved at the Fall 2018 Town meeting. All persons required to obtain a building Permit for new construction and/or additions greater than 25% of the existing building footprint are subject to the requirements of the bylaw. This also includes any permit or decision by Planning Board, Zoning Board of Appeals, or Conservation Commission.

7.7.3.3 Post-Construction

For both commercial and residential projects, the Stormwater Management and Erosion Control Plan shall include provisions for post-construction measures to provide a minimum combined volumetric capacity to recharge a minimum of one (1) inch of rainfall depth over the total impervious area of the property (buildings and impervious surfaces). For commercial projects, the Stormwater Management and Erosion Control Plan shall include stormwater runoff quality controls and other structural and non-structural Best Management Practices (BMPs) to remove pollutants from stormwater prior to recharge to the groundwater in accordance with the Massachusetts Stormwater Handbook. The purpose of this plan is to prevent or minimize increases in stormwater volumes and flows to the MS4 and to reduce pollutant loading to the MS4 and receiving waters.

As-built Drawings

Describe the status of the measures the MS4 has utilized to require the submission of as-built drawings and ensure long term operation and maintenance of completed construction sites required to be complete in year 2 of the permit term:

Needham's Stormwater By-law states:

7.7.3.7 As-Built Drawing

Except as provided for in Section 7.7.3.4, as-built drawings stamped by a Massachusetts Registered Professional Engineer showing all stormwater management systems shall accompany the as-built Plot Plan at the completion of a project.

Street Design and Parking Lots Report

Describe the status of the street design and parking lots assessment due in year 4 of the permit term, including any planned or completed changes to local regulations and guidelines:

Needham is reviewing street design and parking lot regulations and guidelines for stormwater management opportunities for year 4 of the permit term.

Green Infrastructure Report

Describe the status of the green infrastructure report due in year 4 of the permit term, including the findings and progress towards making the practice allowable:

Green infrastructure is a component of Total Watershed Management of which Needham is actively pursuing. Our commitment to Total Watershed Management is included in the SWMP. We continue to develop and encourage green infrastructure through land use and water management principles. The full report is anticipated in year 4 or the permit term.

Retrofit Properties Inventory

Describe the status of the inventory, due in year 4 of the permit term, of permittee-owned properties that could be modified or retrofitted with BMPs to mitigate impervious areas and report on any properties that have been modified or retrofitted:

Needham contracted with the engineering firm BETA to develop an inventory of properties that have existing and proposed BMPs as part of the Watershed Management Plan. That inventory is being reviewed and investigated for viable opportunities for additional BMPs. Determinations are anticipated in year 4 of the permit term.

MCM6: Good Housekeeping

Catch Basin Cleaning

Describe the status of the catch basin cleaning optimization plan:

This is discussed in the SWMP found at <https://www.needhamma.gov/323/Stormwater-Management>.

If complete, attach the catch basin cleaning optimization plan or the schedule to gather information to develop the optimization plan:

- The catch basin cleaning optimization plan or schedule is attached to the email submission
- The catch basin cleaning optimization plan or schedule can be found at the following website:

<https://www.needhamma.gov/323/Stormwater-Management>

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, if known.

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:

If a catch basin is reported to have been >50% full during two consecutive events, the basin will be flagged for review by the Water and Sewer Division for additional investigation as to the root cause of the excessive volume of material. Appropriate mitigation efforts will be made to augment the basin, area or drain as applicable to reduce the level of material present at the next scheduled inspection/cleaning event. As a second line of defense, the drain is inspected with CCTV and flushed of any excessive sediment. Needham also has a brook and culvert program designed to catch large amounts of sediment that may have been missed through catch basin cleaning and drain flushing efforts. Should such mitigation efforts result in no significant change in volume of material, the catch basin will be flagged for additional inspections/cleanings on a more frequent basis to be determined by the Water and Sewer Division.

Street Sweeping

Describe the status of the written procedures for sweeping streets and municipal-owned lots:

Written procedures have been drafted.

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

- Number of miles cleaned:
- Volume of material removed:
- Weight of material removed:

If applicable:

For rural uncurbed roadways with no catch basins, describe the progress of the inspection, documentation, and targeted sweeping plan:

Not applicable. All Needham roadways have catch basins with Cape Cod burms or granite curbing.

Winter Road Maintenance

Describe the status of the written procedures for winter road maintenance including the storage of salt and sand:

Needham DPW's scope of responsibilities during snow and ice events includes 130 miles of roadways, 54 miles of sidewalks, school and municipal parking lots, access to fire and police stations, water and sewer pump stations, water treatment plant, and the recycling transfer station. The Town's snow and ice program is design for long duration heavy snow fall and is easily modified for smaller events. The roads in Needham are first treated with deicing materials from chemical spreaders. The DPW uses various combinations of rock salt, sand, calcium chloride, and a liquid magnesium chloride mixture and

determines application rates based on storm conditions.

Inventory of Permittee-Owned Properties

Describe the status of the inventory, due in year 2 of the permit term, of permittee-owned properties, including parks and open spaces, buildings and facilities, and vehicles and equipment, and include any updates:

A draft Municipal Stormwater Operations and Maintenance (O&M) Program has been developed by the Town. This O&M Program has been prepared to address the good housekeeping and pollution prevention for permittee owned operations requirements (Part 2.3.7.a.) of permit. It provides an inventory of all permittee (Town) owned facilities within the categories of parks and open space, buildings and facilities, and vehicles and equipment. Procedures have been developed and included in this plan to maintain these facilities and the Town’s MS4 stormwater infrastructure such as catch basins and treatment structures and the impervious surfaces, streets and parking lots that are tributary to them. It is anticipated for final completion within year 2 of the permit term.

O&M Procedures for Parks and Open Spaces, Buildings and Facilities, and Vehicles and Equipment

Describe the status of the operation and maintenance procedures, due in year 2 of the permit term, of permittee-owned properties (parks and open spaces, buildings and facilities, vehicles and equipment) and include maintenance activities associated with each:

A draft Municipal Stormwater Operations and Maintenance (O&M) Program has been developed by the Town. This O&M Program has been prepared to address the good housekeeping and pollution prevention for permittee owned operations requirements (Part 2.3.7.a.) of permit. It provides an inventory of all permittee (Town) owned facilities within the categories of parks and open space, buildings and facilities, and vehicles and equipment. Procedures have been developed and included in this plan to maintain these facilities and the Town’s MS4 stormwater infrastructure such as catch basins and treatment structures and the impervious surfaces, streets and parking lots that are tributary to them. It is anticipated for final completion within year 2 of the permit term.

Stormwater Pollution Prevention Plan (SWPPP)

Describe the status of any SWPPP, due in year 2 of the permit term, for permittee-owned or operated facilities including maintenance garages, public works yards, transfer stations, and other waste handling facilities where pollutants are exposed to stormwater:

The Town has also developed draft Stormwater Pollution Prevention Plans (SWPPP) for the Town DPW facility and the Recycling and Transfer Station facility. These plans have been prepared to meet the requirements (Part 2.3.7.b) of the permit. The plans include maps and maintenance logs for record keeping and reporting and fulfills requirement 10 listed above for Good Housekeeping and Pollution Prevention for Permittee Owned Operations. It is anticipated for final completion within year 2 of the permit term.

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:

Reporting procedures in process of creation, anticipated implementation for year 2 permit.

O&M Procedures for Stormwater Treatment Structures

Describe the status of the written procedure for stormwater treatment structure maintenance:

Reporting procedures in process of creation, anticipated implementation for year 2 permit.

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:

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 2 requirements summarized below. (Note: impaired waters and TMDL requirements are not listed below)

Yes, I agree

- Complete system mapping Phase I
- Begin investigations of catchments associated with Problem Outfalls
- Develop or modify an ordinance or other regulatory mechanism for post-construction stormwater runoff from new development and redevelopment
- Establish and implement written procedures to require the submission of as-built drawings no later than two years after the completion of construction projects
- Develop, if not already developed, written operations and maintenance procedures
- Develop an inventory of all permittee owned facilities in the categories of parks and open space, buildings and facilities, and vehicles and equipment; review annually and update as necessary
- Establish a written program detailing the activities and procedures the permittee will implement so that the MS4 infrastructure is maintained in a timely manner
- Develop and implement a written SWPPP for maintenance garages, public works yards, transfer stations, and other waste handling facilities where pollutants are exposed to stormwater
- Enclose or cover storage piles of salt or piles containing salt used for deicing or other purposes
- Develop, if not already developed, written procedures for sweeping streets and municipal-owned lots
- Develop, if not already developed, written procedures for winter road maintenance including storage of salt and sand
- Develop, if not already developed, a schedule for catch basin cleaning
- Develop, if not already developed, a written procedure for stormwater treatment structure maintenance
- Develop a written catchment investigation procedure (*18 months*)

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 in the last 5 years
- 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 uncurbed streets at least annually

Provide any additional details on activities planned for permit year 2 below:

Needham confirms that our SWMP has been, or will be, updated to comply with all applicable permit requirements including but not limited to the year 2 requirements summarized above to the Maximum Extent Practicable.

Part V: Certification of Small MS4 Annual Report 2019

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]