

**Year 2 Annual Report**  
**Massachusetts Small MS4 General Permit**  
**Reporting Period: July 1, 2019-June 30, 2020**

*\*\*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, 2019 and June 30, 2020 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 2 Requirements

- Completed Phase I of system mapping
- Developed a written catchment investigation procedure and added the procedure to the SWMP
- Developed written procedures to require the submission of as-built drawings and ensure the long term operation and maintenance of completed construction sites and added these procedures to the SWMP
- Enclosed or covered storage piles of salt or piles containing salt used for deicing or other purposes
- Developed written operations and maintenance procedures for parks and open space, buildings and facilities, and vehicles and equipment and added these procedures to the SWMP
- Developed an inventory of all permittee owned facilities in the categories of parks and open space, buildings and facilities, and vehicles and equipment and added this inventory to the SWMP
- Completed a written program for MS4 infrastructure maintenance to reduce the discharge of pollutants
  - Developed written SWPPPs, included in the SWMP, for all of the following permittee owned or
  - operated facilities: maintenance garages, public works yards, transfer stations, and other waste handling facilities where pollutants are exposed to stormwater

*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 2 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 requirement to require as-built drawings is included in the draft stormwater regulations, which have not yet been approved by the Select Board. Proceeding with adopting the regulations was delayed to confirm proposed revisions to the Massachusetts Stormwater Handbook by DEP and to account for unknowns

associated with proposed EPA permit modifications.

### 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:
- Properly stored and disposed of catch basin cleanings and street sweepings so they did not discharge to receiving waters
- Provided training to employees involved in IDDE program within the reporting period
- All curbed roadways were swept at least once within the reporting period
- Updated outfall and interconnection inventory and priority ranking as needed

*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 annual 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 public has not had a formal opportunity to provide feedback on the SWMP, due to Covid-19. The original plan was to present the SWMP to the Select Board in conjunction with the stormwater regulations, which was delayed as noted on Page 2.

### **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:

A direct mailing to both residents and businesses known to be connected to a private on-site septic system

were sent out on August 20, 2020. The delay was due in part to Covid-19. The mailing included EPA's infographic entitled "Do Your Part. Be Septic Smart!" last updated May 2018, and the cover letter referenced Town's Stormwater Management Program including a website link and an email address for any stormwater-related questions.

## **Phosphorus (Combination of Impaired Waters Requirements and TMDL Requirements as Applicable)**

### Annual Requirements

#### *Public Education and Outreach\**

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

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

#### *Good Housekeeping and Pollution Prevention for Permittee Owned Operations*

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

#### *Potential structural BMPs*

- Any structural BMPs already existing or installed in the regulated area by the permittee or its agents was tracked and the phosphorus removal by the BMP was estimated consistent with Attachment 3 to Appendix F. The BMP type, total area treated by the BMP, the design storage volume of the BMP and the estimated phosphorus 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:

During Permit Year 2, the Town hired a contractor to inspect and clean town-owned stormwater treatment structures (i.e. Vortech units). The MS4 mapping of town-owned stormwater BMPs and the development of Operation & Maintenance Procedures were completed by the end of Year 2, as required. For street sweeping, the entire town is swept once per year in the spring, with some areas of high traffic being swept more frequently for public events, after storm debris accumulation, and in the event of any accident/spills where sand may be used for clean-up. The Town is working to increase street sweeping frequency to two times per year (per the requirements of the permit), within watersheds of impaired waterbodies or TMDLs. Additional funds were approved in FY21 and included funding for a vacuum sweeper.

Phosphorus Potential Structural BMPs: Mapping of structural BMPs and stormwater treatment structures was completed in Year 2, as required. Tracking of BMPs or estimated phosphorus removal will begin during Permit Year 3.

## **Solids, Oil and Grease (Hydrocarbons), or Metals**

Annual Requirements

*Good Housekeeping and Pollution Prevention for Permittee Owned Operations*

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

*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:

See street sweeping additional details noted on Page 4 under Phosphorus.  
All MS4 catch basins are cleaned annually regardless of sediment depth.

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

### Part III: Receiving Waters/Impaired Waters/TMDL

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

- Yes  
 No

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

The Town of Bedford has reviewed the Final Massachusetts Year 2016 Integrated List of Waters and found a number of changes since the 2014 List as follows:

- Concord River (MA82A-07) is no longer listed for phosphorus, but is now impaired for E. coli in addition to fecal coliform
- Elm Brook (formerly MA83-05) has been split into two segments
  - o MA83-23 Headwaters, south of Route 2A, Lincoln to beginning of channelized portion southwest of Kendall Court, Bedford – Category 2
  - o MA83-24 From beginning of channelized portion southwest of Kendall Court, Bedford to confluence with Shawsheen River, Bedford – Category 5, has TMDL for E.coli and fecal coliform, continues to have a sedimentation/siltation/solids concern
- Shawsheen River (MA83-01, MA83-08, and MA83-17) has a new impairment for E.coli, which is covered under existing TMDL [CN 122.0, 9/12/2002]
- Spring Brook (MA83-14) is now a Category 2 waterbody, Fecal Coliform impairment removed, applicable WQS attained; due to change in WQS.
- Vine Brook (MA83-06) - Headwaters (southeast of Granny Hill) near Grant Street, Lexington to confluence with Shawsheen River, Bedford (through Butterfield Pond formerly segment MA83003) is now impaired by DO and turbidity, but no longer impaired by Fecal Coliform.
- Note – no changes to Fawn Lake (MA83004)

We have also added approximately 20 new outfalls based on completed fieldwork and the Town's GIS Analyst confirming BMPs as part of the Phase I system mapping. The updated MS4 Drainage Outfall map is available on the Town's Stormwater Management Program website.

## 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: Special Events/Festivals/Fairs**

Message Description and Distribution Method:

At the annual Bedford Day Fair, the DPW booth displayed stormwater messages to the residents including notepads with "Bedford's Drains are just for rain!", pet waste bags with our message to clean up after your pet and protect our rivers and streams, and crayons and activity books "Dwayne the Storm Drain", with educational information to teach families about catch basins.

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: Brochures & Pamphlets**

Message Description and Distribution Method:

An updated tri-fold brochure was mailed to dog owners with their license renewals, describing the importance of proper disposal of pet waste to reduce stormwater pollution in rivers and streams, with references to the local bylaws. Brochures included a photograph of a catch basin with a bag of pet waste on top, and a diagonal red line through it, including text noting that storm drains are directly connected to resource areas.

Targeted Audience:

Responsible Department/Parties:

## Measurable Goal(s):

Town Clerk mailed out 550 pet waste brochures with dog license renewals.

Message Date(s): June 30, 2020

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:

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**BMP: Newspaper Article/Press Release**

## Message Description and Distribution Method:

Posted articles in the Town's online newspaper regarding yard waste collection, including information on proper disposal and keeping catch basins clear. The Town provides opportunities for yard waste drop-off and curbside pick-up, as well as additional clean-up following major storm events.

Targeted Audience: Residents, businesses, institutions and commercial facilities

Responsible Department/Parties: DPW Operations

## Measurable Goal(s):

The Bedford Citizen has over 1900 email subscribers, 2446 Facebook followers, and 1500 Twitter followers.

Message Date(s): October 18, 2019; November 26, 2019; & April 16, 2020

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:

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**BMP: Newspaper Article/Press Release**

## Message Description and Distribution Method:

Published an article in the Town's online newspaper entitled "Working Together to Prevent Stormwater Pollution ~ The DPW Needs Dog Owners' Help", which included information on why and how to prevent stormwater pollution from pet waste. The article also referenced EPA regulations for stormwater as well as the Town's bylaws. A link was provided to the Pet Waste Flyer noted above that was mailed to dog owners renewing their license.

Targeted Audience: Businesses, institutions and commercial facilities

Responsible Department/Parties: DPW Operations

Measurable Goal(s):

The Bedford Citizen has over 1900 email subscribers, 2446 Facebook followers, and 1500 Twitter followers.

Message Date(s): December 20, 2019

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: Brochures & Pamphlets**

Message Description and Distribution Method:

"Proper Disposal of Leaves & Yard Waste Prevents Flooding & Stormwater Pollution" referencing EPA Stormwater Regulations and noting leaf litter contributes nutrients which pollutes rivers and streams. Mailing included calendar and schedule of yard waste collection and drop-off opportunities at Compost Center.

Targeted Audience: Residents

Responsible Department/Parties: DPW Operations

Measurable Goal(s):

Direct mailing sent to all Bedford households (approximately 4,500)

Message Date(s): October 2019

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: Signage**

Message Description and Distribution Method:

Designed and purchased two metal signs noting "Please No Yard Waste Dumping; Protect Our Resources" including Stormwater Matters logo, placed in residential neighborhood where yard waste dumping was an issue.

Targeted Audience: Residents

Responsible Department/Parties: DPW Operations & Conservation Administrator

Measurable Goal(s):

Approximately 15 households in the residential neighborhood where signs were installed.

Message Date(s): December 2019

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:

Signs made in response to complaints of yard waste dumping in adjacent resource area.

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:**

An opportunity for public participation in the development of the Stormwater Management Program was not able to be provided as Covid-19 affected operations beginning on March 13, 2020.

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:**

During our annual Bedford Day fair, the DPW distributed educational materials related to stormwater, including pet waste bags and 'Dwayne the Storm Drain' coloring books from MRWA.

### 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**

Below, check all that apply.

The following elements of the Phase I map have been completed:

- Outfalls and receiving waters
- Open channel conveyances
- Interconnections
- Municipally-owned stormwater treatment structures
- Waterbodies identified by name and indication of all use impairments
- Initial catchment delineations

*Optional:* Describe any additional progress you made on your map during this reporting period or provide additional status information regarding your map:

During IDDE fieldwork with the Town's consultant, we were able to refine mapping based on connectivity observed in the field.

**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:

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

Number of 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:

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:*

Bedford has no problem outfalls. Catchment investigations are anticipated to begin in Permit Year 3.

### **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:

*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:*

No illicit discharges were found as defined by the permit, however dry weather sampling indicated a few catchments that need further investigation in Permit Year 3.

### **Employee Training**

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

November 26, 2019 - MS4 outfall inventory and screening training  
 December 16, 2019 - SWPPP site visits  
 May 7, 2020 - EPA Soak Up The Rain webinar "Effective Public Outreach in MA MS4 Communities"  
 June 15, 2020 - Distributed laminated placards to each DPW vehicle (24) "Pocket Guide to Illicit Discharge"  
 July 8, 2020 - Baystate Roads Zoom webinar "A User's Guide to MS4 Permitting"

### **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**

*Below, select the option that describes your ordinance or regulatory mechanism progress.*

- Bylaw, ordinance, or regulations are updated and adopted consistent with permit requirements
- Bylaw, ordinance, or regulations are updated consistent with permit requirements but are not yet adopted
- Bylaw, ordinance, or regulations have not been updated or adopted

#### **As-built Drawings**

Describe 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:

As-built requirements are included as part of the Conservation and Planning permitting process. As noted above, the (draft) stormwater regulations will also require as-built drawings as part of the stormwater permit process.

#### **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:

Preparation of the Street Design and Parking Lots Report has not yet begun but will be accomplished in Permit Year 4.

**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:

Preparation of the Green Infrastructure Report has not yet begun but will be accomplished in Permit Year 4.

**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:

Preparation of the Retrofit Properties Inventory has not yet begun but will be accomplished in Permit Year 4.

**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:

**Street Sweeping**

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

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

**O&M Procedures and Inventory of Permittee-Owned Properties**

Below, check all that apply.

The following permittee-owned properties have been inventoried:

- Parks and open spaces
- Buildings and facilities
- Vehicles and equipment

The following O&M procedures for permittee-owned properties have been completed:

- Parks and open spaces
- Buildings and facilities
- Vehicles and equipment

**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:

The Town completed initial site inspections for 3 municipal properties in December 2019 with our stormwater consultant, as part of SWPPP preparation and employee training. Corrective actions to address minor good housekeeping issues identified during the site visits were completed in January and February 2020.

**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 made changes to the public education message timelines for developers, businesses, commercial & industrial audiences as noted in the Stormwater Management Plan Amendment Log. Due to Covid-19 delays, the messages planned for Year 2 and 4 have been revised to be delivered in Year 3 and 5 instead, spaced 1 year apart as required by the permit.

Additionally, the Public Education BMP for Special Events/Festivals/Fairs had to be revised as the annual Bedford Day Fair will not be taking place in Permit Year 3, due to Covid-19. This change is also included in the Stormwater Management Plan Amendment Log.

### **COVID-19 Impacts**

*Optional:* If any of the above year 2 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:

Covid-19 related impacts were included above in the applicable sections.

### **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 3 requirements summarized below. (Note: impaired waters and TMDL requirements are not listed below)

Yes, I agree

- Inspect all outfalls/ interconnections (excluding Problem and Excluded outfalls) for the presence of dry weather flow
- Complete follow-up ranking as dry weather screening becomes available

### **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 uncurbed streets at least annually
- Continue investigations of catchments associated with Problem Outfalls
- 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

Provide any additional details on activities planned for permit year 3 below:

Due to Covid-19, our annual Bedford Day fair has been canceled for Permit Year 3, which changes our public education BMP for residents. The Town plans to use the fall and spring Recycle Days as an opportunity to distribute public education messages to residents as a replacement BMP.

## Part V: Certification of Small MS4 Annual Report 2020

### 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:  Digitally signed by David Manugian  
Date: 2020.09.28 14:48:55 -04'00' Date:

*[Signatory may be a duly authorized representative]*

*Note: When prompted during signing, save the document under a new file name.*

### Annual Report Submission

*Please submit the form electronically via email to both EPA and MassDEP by clicking on one of the links below or using the email addresses listed below. Please ensure that all required attachments are included in the email and not attached to this PDF.*

EPA: [stormwater.reports@epa.gov](mailto:stormwater.reports@epa.gov)

MassDEP: [laura.schifman@mass.gov](mailto:laura.schifman@mass.gov)

### Paper Signature:

*If you did not sign electronically above, you can print the signature page by clicking the button below.*

*Optional: If you did not sign electronically above, you may lock the form by clicking the "Lock Form" button below which will prompt you to save the locked version of the form. Save this locked version under a new file name.*