

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 written operations maintenance (O+M) procedures and inventories were drafted before the end of permit year 2, but because of staffing limitations due to COVID-19, the O+M procedures and inventories were not finalized and posted until August.

In Permit Year 2, Grafton completed review of the new Grafton DPW Yard site and determined that the facility is outside of the MS4 regulated area and that it does not drain to the MS4 regulated area. As indicated in EPA's Response to Comments on the MS4 permit document, "municipal facilities outside of the MS4 area are not subject to the good housekeeping requirements at part 2.3.7." Therefore, Grafton determined that a SWPPP for the new DPW Yard is not required under the MS4 permit.

<https://www3.epa.gov/region1/npdes/stormwater/ma/2016fpd/rtc-2016-ma-sms4-gp.pdf> .

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:
- https://www.grafton-ma.gov/sites/g/files/vyhlf4461f/uploads/grafton_idde_plan_2020-final-compiled.pdf
(in IDDE Plan)
- 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 SWMP was updated and ready for posting on 6/30/20, but Grafton's website was undergoing maintenance. The SWMP was reposted as soon as possible after maintenance was complete, on 7/6/20.

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:

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:

Per Appendix F and H requirements for discharges to nutrient-impaired waterbodies, Grafton will track and estimate nutrient removal for structural BMPs after developing a list of potential structural BMPs in Permit Year 5.

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:

Lake and Pond Phosphorus TMDL

- Completed Legal Analysis

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:

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:

"Quinsigamond Ave" in the NOI was replaced with Quinsigamond River in the SWMP for clarification. That distinction did not change relevant impairments or TMDLs. Grafton continues to review its list of receiving waters, outfalls, and impairments and will update as needed in Permit Year 3. Specific updates made in Permit Year 2 based on the 2016 impaired waters list include the following:

-Cronin brook is now listed as impaired for E. Coli. The Massachusetts 303d list notes "New segment - Impairment added based on new data/assessment."

-Flint Pond is now listed as impaired for nutrient/Eutrophication Biological Indicators. The Massachusetts 303d list notes, "New impairment, covered under existing TMDL [CN 115.0, 6/28/2002], added to this segment for 2016. "

-Blackstone River (51-03 segment) impairments were updated to include Oil & Grease/PAH. While not included in Appendix 2 of the 2016 impaired waters list, Foam/Flocs/Scum/Oil Slicks has been removed and Oil and Grease and Flocculant Masses has been added, so this clarification was made in Grafton's list of impaired waterbodies.

These impairments were already included elsewhere in the SWMP, so did not change regulatory requirements for Grafton.

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: 1-1 Stormwater Management Webpage

Message Description and Distribution Method:

Grafton continued to update the Stormwater Management webpage with general educational information on stormwater and as a repository for information (e.g., SWMP, IDDE Plan). The Stormwater Management webpage also includes an informational video from Think Blue Massachusetts and resources for pollution prevention best practices.

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:1-3 Stormwater 101 Educational Message

Message Description and Distribution Method:

Grafton shared the Stormwater 101 educational message from Think Blue Massachusetts (<https://www.thinkbluemassachusetts.org/>) on the Town of Grafton Planning & Conservation Departments' Facebook page. The message included information about proper disposal of pet waste, covering trash cans, and preventing spills from job sites and businesses.

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

Facebook: 1 like, 1 share (326 followers, 308 likes Facebook page total)

Message Date(s): May 5, 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:

BMP: 1-5 Septic System Educational Message

Message Description and Distribution Method:

Grafton distributed an annual septic system educational message (EPA SepticSmart) using Town of Grafton Planning & Conservation Department's Facebook page.

Targeted Audience: Residents

Responsible Department/Parties: Board of Health, Department of Public Works

Measurable Goal(s):

Facebook: 1 like (326 followers, 308 likes Facebook page total)

Message Date(s): November 22, 2019 and May 13, 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:

Grafton added this BMP, upon understanding permit requirement.

BMP: 1-6 Dog Owner Education

Message Description and Distribution Method:

The Grafton Town Clerk distributed a fact sheet about pet waste management to dog owners seeking or renewing dog licenses.

Targeted Audience: Residents

Responsible Department/Parties: Department of Public Works, Town Clerk

Measurable Goal(s):

99 dog owner fact sheets distributed by the Town Clerk

Message Date(s): Ongoing

Message Completed for: Appendix F Requirements Appendix H Requirements Was this message different than what was proposed in your NOI? Yes No

If yes, describe why the change was made:

Grafton added this BMP, upon additional impairments and understanding permit requirement.

BMP: 1-7 Spring Message about Grass Clippings and Fertilizer

Message Description and Distribution Method:

Grafton shared educational information from Think Blue Massachusetts on the Town of Grafton Planning & Conservation Department's Facebook page with information about the proper use and disposal of grass clippings and encouraging the use of phosphorus-free fertilizers.

Targeted Audience: Residents, Businesses, Developers

Responsible Department/Parties: Planning/Conservation

Measurable Goal(s):

326 followers, 308 likes Facebook page total

Message Date(s): April 1, 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:

BMP: 1-8 Summer Message about Dog Waste Management

Message Description and Distribution Method:

Grafton posted the Think Blue Massachusetts "Do Your Doody for Clean Water" with information on proper disposal of dog waste on the Town of Grafton Planning & Conservation Department's Facebook page. Stormwater 101 Educational Message (BMP 1-3) described above also covered pet waste.

Targeted Audience: Residents

Responsible Department/Parties: Planning/Conservation

Measurable Goal(s):

Facebook: 2 likes (326 followers, 308 likes Facebook page total)

Message Date(s): June 2, 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:

BMP: 1-9 Fall Message about Leaf Litter

Message Description and Distribution Method:

Grafton posted the "Be a Leaf Hero" flyer with information about best practices for leaf litter management and disposal on the Town of Grafton Planning & Conservation Department's Facebook page.

Targeted Audience: Residents

Responsible Department/Parties: Planning/Conservation

Measurable Goal(s):

Facebook: 1 like (326 followers, 308 likes Facebook page total)

Message Date(s): October 10, 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: Stormwater Education Flyers and Posters in Town Hall

Message Description and Distribution Method:

Continued to post stormwater education flyers and posters in Town Hall, as initiated under the 2003 MS4 Permit.

Targeted Audience: Targeted Audience: Residents, Businesses, Developers, Industries

Responsible Department/Parties: Conservation/Planning

Measurable Goal(s):

Continued to post and have these materials available in Town Hall.

[Empty text box]

Message Date(s): Ongoing

Message Completed for: Appendix F Requirements Appendix H Requirements

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

If yes, describe why the change was made:

[Empty text box]

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:**

Grafton posted its SWMP on the updated Stormwater Management Program website: <https://www.grafton-ma.gov/conservation-commission/pages/stormwater-management-program-swmp>
The webpage also welcomes comments and provides an email address for comments: "stormwater@graftonma.gov." No comments were received.

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:**

-Grafton DPW helped with trash pick-up for informal volunteer clean-ups that happened in spring 2020, instead of larger town-wide clean-ups that were canceled due to COVID-19.
-The household hazardous waste collection day (BMP 2-3) was postponed due to COVID-19.

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:

Grafton will continue to update mapping as new information becomes available.

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.grafton-ma.gov/sites/g/files/vyhlf4461/f/uploads/grafton_idde_plan_2020-final-compiled.pdf
in IDDE Plan)

*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:

N/A

*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: 0

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

[Empty text box for optional information]

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:

[Empty text box for website information]

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: 1

Number of illicit discharges removed: 1

Estimated volume of sewage removed: 140 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: 1

Total number of illicit discharges removed: 1

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

[Empty text box for optional information]

Employee Training

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

Grafton DPW Director and Highway Superintendent participated in Central Massachusetts Regional Stormwater Coalition (CMRSWC) IDDE Training Workshop held May 7, 2020.

*Below, report on the construction site plan reviews, inspections, and enforcement actions completed **during this reporting period.***

Number of site plan reviews completed: 4

Number of inspections completed: 2

Number of enforcement actions taken: 0

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:

Grafton's Stormwater Management Bylaw and Regulations requires post-construction stormwater management for new development and redevelopment projects under the Stormwater Management Bylaw and Regulations, including as-built drawings and long term operation and maintenance of completed construction sites.

During Permit Year 3, Grafton will revise the bylaw and regulations, as needed, to bring the bylaw and regulations into compliance with new water quality requirements in the 2016 MS4 Permit. The Bylaw and Regulations are available on Grafton Conservation Commission's website at: <https://www.grafton-ma.gov/conservation-commission/pages/stormwater-bylaw>

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:

No progress made during the reporting period.

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:

Grafton has completed a green infrastructure assessment meeting permit requirements as part of a 2016 report available at the following link:
<https://www.grafton-ma.gov/planning-department/pages/low-impact-development-study>

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:

No progress during the reporting period.

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:

N/A

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: tons

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:

N/A

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:

N/A

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:

Under MCM 6, the total number of catch basins in the MS4 system refers to the total number of inlets (2,028) in the MS4 regulated area, as shown on Grafton's stormwater map at the link below. Not all inlets are catch basins, as catch basins are a sub-set of those total inlets. The number of catch basins inspected and cleaned is a town-wide metric, but the non-MS4 area is small and does not have many catch basins.

<https://vhb.maps.arcgis.com/apps/webappviewer/index.html?id=9e7d127e6b934026bf68e193937a650d>

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:

N/A

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:

N/A

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:

Carter Terenzini

Title:

Temporary Town Administrator

Signature:



Date:

09/28/20

[Signatory may be a duly authorized representative]