

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

Phase I mapping - All known drainage infrastructure has been mapped, including outfalls, open channels, catch basins and pipes. Some data gaps were identified and are being investigated as part of the ongoing outfall and catchment investigations. Any changes in locations and/or new infrastructure will be incorporated

into the map as the investigations are completed.

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 outfall and interconnection inventory is updated on an ongoing basis as dry weather screening is performed. The priority ranking will be updated after dry weather inspections are completed and before catchment investigations commence.

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:

Charles River Watershed 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:

The MS4 Permit requires the Town to reduce phosphorus loads to the Charles River, a portion of which comes from existing privately developed properties that discharge to the Town's MS4 or directly to surface waters. These existing private properties are currently not subject to stormwater permits and are not regulated to reduce their share of phosphorus contributions to TMDL waters. Instead, the Town is responsible for achieving phosphorus reductions from these private developments because these developments are located within Holliston's MS4. The Town supports exploring a state or federal level stormwater permit for existing large commercial, industrial, and institutional properties located within the Charles River watershed to help mitigate impacts from development per EPA's August 13, 2020 stakeholder letter.

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 2016 Integrated List of Waters was finalized and includes the following new impairments and/or TMDLs in Holliston:

- Bogastow Brook (MA72-16) has a TMDL for E.Coli (previously just fecal coliform)
- Chicken Brook (MA72-34) is impaired for E.Coli
- Hopping Brook (MA72-35) is impaired for E.Coli

An updated list of outfalls and receiving waters is ongoing as outfall inspections are performed and will be included in the Town's updated IDDE Plan, which includes a detailed list of each outfall by ID and receiving water.

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: Follow Think Blue Campaign on Facebook

Message Description and Distribution Method:

The Town follows the state Think Blue campaign on its Facebook page. The Think Blue campaign provides tips for residents (pet waste, yard waste, lawn care, lawn watering, chemical disposal, care care, infiltration, septic systems and pool care), businesses (waste and material storage, infiltration, snow and ice removal, outdoor cleaning, landscaping, irrigation, fleet care), developers (permitting, LID, pre-construction planning, erosion control, site maintenance) and industrial facilities (permitting, equipment maintenance, site landscaping, irrigation, waste disposal, chemical storage, spill prevention/response and snow and ice removal) to prevent stormwater pollution.

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: Pet Waste Education

Message Description and Distribution Method:

The Think Blue Do Your Doody flyer was modified to include reference to Holliston's dog waste bylaw. The flyer was posted on Facebook, copies were provided at the Town Clerk's counter, copies were distributed to dog owners by the Town Clerk during dog licensing in April, copies were posted by the Recreation Department at Pleasure Point, Stoddard Park, Mission Springs and Weston Pond, copies were posted by the Trails Committee along the Upper Charles Trail, and a copy was posted at the Board of Health information kiosk in Town Hall. The "Pet Waste on Bathing Beaches: Guidelines for Pet Owners (MA Dept. of Public

Health)" flyer was also posted at the Board of Health information kiosk in Town Hall. Additionally, the Town follows the Think Blue campaign on Facebook, which provides additional pet waste tips.

Targeted Audience: Residents

Responsible Department/Parties: DPW, Town Clerk, Recreation Department

Measurable Goal(s):
778 Facebook reaches, 1583 dog licenses issued.

Message Date(s): Dog licensing in April 2020. Flyers continuously available at Town Clerk's office. Do Your Doody flyer posted on Facebook, recreation areas and parks in March 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: Stormwater and the Construction Industry Outreach

Message Description and Distribution Method:
The Town has a webpage dedicated to Stormwater Management educational materials. The webpage can be linked from the DPW website where the SWMP and IDDE Plan are made available online. A "Stormwater Management and the Construction Industry" brochure is available and contains information on planning and implementing erosion and sediment control practices and maintaining construction BMPs.

Targeted Audience: Developers (construction)

Responsible Department/Parties: DPW, Planning Board, Conservation Commission, Technology Dept.

Measurable Goal(s):
Continued webpage maintenance updates.

Message Date(s): Continuous posting.

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: Swimming Pool Outreach

Message Description and Distribution Method:

The "Swimming Pools and Surface Water Quality: Best Practices Guide for Swimming Pool Owners in the Wachusett Watershed (Mass. DCR) is posted at the Board of Health information kiosk in Town Hall.

Targeted Audience: Residents

Responsible Department/Parties: DPW, Planning Board, Conservation Commission

Measurable Goal(s):

Distribution of flyers through public office.

Message Date(s): Continuous posting.

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: Waste Disposal Outreach

Message Description and Distribution Method:

The Town posted hazardous waste day disposal/don't dump it down the drain information on Facebook. The Town also posted information on the Board of Health tire drop off day. All hazardous waste days, tire drops, mosquito spraying and Earth Day clean-ups are run as public service announcements on local cable access television.

Targeted Audience: Residents and Business, institutions and commercial facilities

Responsible Department/Parties: DPW, Planning Board, Board of Health, Technology Dept.

Measurable Goal(s):

521 Facebook reaches for the hazardous waste posting and 1129 Facebook reaches for the tire drop off day.

Message Date(s): March 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: Pollution Prevention Outreach

Message Description and Distribution Method:

The Town has a webpage dedicated to Stormwater Management educational materials. The webpage can be linked from the DPW website where the SWMP and IDDE Plan are made available online. A Stormwater Management fact sheet and Stormwater Management Helpful Hints fact sheet are available and contain information on: erosion, hazardous waste collection; outside water use, septic management, pet waste management, and water conservation. The Town also posts a "Take the Stormwater Runoff Challenge" word puzzle and a brochure on water efficient landscaping. A "Clean Water begins with you. Let's Think Blue!" poster is displayed in Town Hall.

Targeted Audience: Residents, Businesses, institutions and commercial facilities

Responsible Department/Parties: DPW, Planning Board, Conservation Commission, Technology Dept.

Measurable Goal(s):

Continued webpage maintenance updates and display of materials in Town Hall.

Message Date(s): Continuous posting.

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 Maintenance

Message Description and Distribution Method:

In addition to following Think Blue pollution prevention tips, the EPA's "A Homeowner's Guide to Septic Systems" is available in the public information slot in Town Hall. The Board of Health also has a link to MassDEP's website for tips on caring for your septic system.

Targeted Audience: Residents, Business, institutions and commercial facilities, industrial facilities

Responsible Department/Parties: DPW, Planning Board, Board of Health

Measurable Goal(s):

Distribution of brochure through Town Hall and tips through website.

Message Date(s): Continuous posting.

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: Local Coverage of Conservation Commission Meetings

Message Description and Distribution Method:

Local coverage of Conservation Commission meetings is provided through newspaper articles/press releases twice monthly. Since March 2020, all regulatory boards are being covered by HCAT and being recorded and posted. Stormwater topics and water quality protection are often discussed at these meetings.

Targeted Audience: Residents

Responsible Department/Parties: Conservation Commission, Planning Board, Technology Dept.

Measurable Goal(s):

Broadcast public meetings.

Message Date(s): Twice monthly.

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 this reporting period:**

SWMP Plan for Download - The Town has posted the SWMP Plan on Town website along with contact information to allow for public comment.

The Town's policy for handling stormwater complaints or inquiries is to send it to the department that has jurisdiction over the project or issue.

River and Pond Cleanups - The Parks and Recreation Department does seasonal debris cleanup annually at both park areas on Lake Winthrop (Stoddard Park and Pleasure Point) using lifeguards and camp counselors. They also employ benthic mats for weed control and rake and re-position periodically.

Annual household hazardous waste collection day provided 7/11/2019 with nearly 277 cars/residents participating. Clean Harbors Environmental Services conducted the event and disposed of materials collected (e.g., solvents, aerosols, pesticides, paints, motor oil, lead acid batteries, etc.). Holliston paid \$13,198 to Clean

Harbors Environmental Services.

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:**

[Empty text box for public involvement description]

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:

The Town has mapped all known outfalls and receiving waters/waterbodies, open channel conveyances, stormwater BMPs, and completed initial catchment delineations. Additionally, most of the known catch basins, manholes, and piping have been mapped which is not required until Year 10. Interconnections along state owned portions of Route 16 and Route 126 have been mapped where mapping of state infrastructure was readily available. The Town expects that MassDOT will lead the effort to map additional interconnections along state owned roads as part of their TS4 Permit.

Some data gaps in the mapping were identified and are being investigated/reconciled as part of the ongoing outfall and catchment investigations. Any changes in locations and/or new infrastructure will be incorporated into the map as the investigations are completed.

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:

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 found this period.

Employee Training

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

IDDE training was performed on March 4, 2020 and included background information on stormwater pollution, MS4 requirements, illicit discharge program requirements and investigations and general good housekeeping practices.

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:

There are a total of 11 projects with ongoing periodic inspections: Nine projects are inspected periodically by Planning Board third party inspectors; two projects are inspected periodically by the Conservation agent on wetlands district projects not in common jurisdiction. The Town is working on a tracking system to document the total number of inspections performed.

One enforcement action under the Land Disturbance and Stormwater Management By-Law and one enforcement action under the local Wetland By-law (resulted in stormwater design retrofit currently under construction).

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:

The Town's existing bylaw and regulations require the permittee to submit as-built drawings of all structural stormwater controls and treatment best management practices at the completion of the project. Stormwater Management and Operation and Maintenance Plan are also required under the regulations. As a result of the COVID-19 outbreak, regulations have not been adopted as planned during Permit Year 2. The Town now anticipates adopting stormwater regulatory updates as part of the Year 3 requirements under EPA's pending updated permit schedule.

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:

N/A, to be completed during future permit years.

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:

N/A, to be completed during future permit years.

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:

The Town completed an inventory of its permittee-owned properties. Facilities will be evaluated for potential BMP retrofit opportunities during future permit years.

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:

Not yet applicable.

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:

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:

SWPPPs were developed at the end of Permit Year 2. SWPPP inspections will begin in Permit Year 3.

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 held a tire recycling day in October 2019 in partnership with Central Mass. Mosquito Control 248 tires were removed.

The Town adopted an illicit discharge bylaw in October 2019.

The Recreation Department spent \$1200 on Canadian goose management at Stoddard Park fields and beachfront to improve the water quality at Lake Winthrop.

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:

The Highway Department had a limited work schedule between March 20 and July 9, 2020 due to COVID-19. Employees at Town Hall worked a flexible remote schedule during this same period. Any normal public education postings at the Annual Town Meeting were banned.

Due to COVID-19, Town meeting was rescheduled for July 2020 at which time the Town's updated Stormwater and Land Disturbance Bylaw was adopted. Accompanying regulations have been updated and are expected to be adopted as part of the Year 3 requirements under EPA's pending updated permit schedule.

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:

The SWMP and IDDE Plan will be updated in FY-21 to address work performed through Year 3. This will include incorporating the above items as necessary, results from outfall dry weather screening, as well as documenting results of other annual activities such as BMP inspections.

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:

Date:

[Signatory may be a duly authorized representative]