

# Annual Report

## City of New Bedford, Massachusetts



### MS4 General Permit Compliance

**Year 2**

(July 1, 2019 to June 30, 2020)

September 28, 2020

**CDM  
Smith**



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## Attachments (Under Separate Cover)

**Attachment A – SSO Inventory**

**Attachment B – Priority Ranking of Outfalls/Interconnections**

**Attachment C – Nitrogen Removal by BMP**

**Attachment D – Outfall Monitoring Results**

**Attachment E – Catchment Investigation Results**

# Section 1

## Contact Information

The City's EPA NPDES Permit number is MAR041140.

The City of New Bedford submits this Annual Report under the Massachusetts Small MS4 General permit for the following reporting period:

Permit Year: Year 2

Reporting Period: July 1, 2019 to June 30, 2020

## Primary MS4 Program Manager

<b>Name:</b>	Jamie Ponte
<b>Title:</b>	Commissioner
<b>Department:</b>	Public Infrastructure
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<b>Phone Number:</b>	508-979-1550
<b>Street Address:</b>	1105 Shawmut Avenue
<b>City:</b> New Bedford	<b>State:</b> MA <b>Zip Code:</b> 02746

## Stormwater Management Program (SWMP) Information

The SWMP was last updated: June 28, 2019

The SWMP can be found at the web address: <http://s3.amazonaws.com/newbedford-ma/wp-content/uploads/sites/49/20191219211632/Final-New-Bedford-SWMP-6-28-19.pdf>

## Section 2

# Self-Assessment

**Table 1** states the impairments and the TMDL that are applicable to the City's MS4 permit.

**Table 1: Summary of Impairments of Receiving Waters**

Impairments	TMDLs In state
Bacteria/Pathogens	Bacteria/Pathogens
Nitrogen	
Solids/Oil/Grease (Hydrocarbons)/ Metals	

## Year 1 Requirements

Year 1 permit requirements are listed below and were reported on in the annual report titled "MS4 General Permit Compliance Year 1 (May 1, 2018 to June 30, 2019)" dated September 30, 2019.

- ☒ Develop and begin public education and outreach program.
- ☒ Identify and develop an inventory of all known locations where SSOs have discharged to the MS4 in the last 5 years.
- ☒ The SSO inventory is attached to the email submission (Attachment A)
- ☒ Develop written IDDE plan including a procedure for screening and sampling outfalls.
- ☒ IDDE ordinance complete.
- ☒ Identify each outfall and interconnection discharging from MS4, classify into the relevant category, and priority rank each catchment for investigation.
  - ☒ The priority ranking of outfalls/interconnections is attached to the email submission. (Attachment B)
- ☒ Construction/Erosion and Sediment Control (ESC) ordinance complete.
- ☒ Develop written procedures for site inspections and enforcement of sediment and erosion control measures.
- ☒ Develop written procedures for site plan review.
- ☒ Keep a log of catch basins cleaned or inspected.
- ☒ Complete inspection of all stormwater treatment structures.

## Year 2 Requirements

Year 2 permit requirements are listed below. Additional information on each of the requirements are discussed in later sections.

- ☒ Completed Phase I of system mapping.
- ☒ Developed a written catchment investigation procedure and assess 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.
- ☒ The SSO inventory has been updated, including the status of mitigation and corrective measures implemented.
  - ☒ The updated SSO inventory is attached as an appendix.
- ☒ Updated outfall and interconnection inventory and priority ranking as needed.

## Annual Requirements

Items to be completed on a recurring annual basis are noted below.

- ☒ Annual opportunity for public participation in review and implementation of SWMP.
- ☒ Comply with State Public Notice requirements.
- ☒ Keep records relating to the permit available for 5 years and make available to the public.

- ☒ Properly store and dispose of catch basin cleanings and street sweepings so they do not discharge to receiving waters.
- ☒ Annual training to employees involved in IDDE program.
- ☒ All curbed roadways have been swept a minimum of one time per year.

## Bacteria/Pathogens

### Annual Requirements

#### Public Education and Outreach

- ☒ Annual message encouraging the proper management of pet waste, including noting any existing ordinances where appropriate.
- ☒ Permittee or its agents disseminate educational material to dog owners at the time of issuance or renewal of dog license, or other appropriate time.
- ☒ Provide information to owners of septic systems about proper maintenance in any catchment that discharges to a water body impaired for bacteria. (N/A)

## Nitrogen

### Annual Requirements

#### Public Education and Outreach

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

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

- ☒ Increase 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 listed in Table 3 of Attachment 1 to Appendix H already existing or installed in the regulated area by the permittee or its agents shall be tracked and the permittee shall estimate the nitrogen removal by the BMP consistent with Attachment 1 to Appendix H. Document the BMP type, total area treated by the BMP, the design storage volume of the BMP and the estimated nitrogen removed in mass per year by the BMP in each annual report.
- ☒ The estimate of nitrogen removal is attached to the email submission. (Attachment C)

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

### Annual Requirements

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

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



## Section 3

### Receiving Waters/Impaired Waters/TMDL

Changes have been made to the lists of receiving waters, outfalls, and impairments since the NOI was submitted:

- Turner's Pond was added to the list of receiving waterbodies. No outfalls or interconnections are tributary to this receiving water.
- Following field activities and a more detailed review of available record drawings, five City-owned outfalls/interconnections were removed. The removed locations fell into one of two categories: 1) outfalls owned by other MS4s (e.g., MassDOT) that had been incorrectly mapped as owned by the City, or 2) the downstream end of culverts with no internal pipe connections (i.e., are strictly receiving water conveyance).
- Following clarification of definition of an "outfall", 181 additional City-owned discharge locations have been added. These discharges are connected to combined sewer outfall pipes, downstream of regulating structures. Note: discharges were identified based on existing GIS mapping. An update will be provided following field inspection(s) as appropriate.

**Table 2** summarizes the most current list of receiving waters, outfalls, and impairments.

**Table 2: List of Receiving Waters, Outfalls and Impairments**

Waterbody segment that receives flow from MS4	# Outfalls/ Interconnections	Dissolved Oxygen/ DO Saturation	Nitrogen	Oil & Grease/ PAH	Other pollutants causing impairments
Acushnet River (MA95-33)	39	X	X	X	Fecal Coliform, (Debris/Floatables/trash), Color, Polychlorinated biphenyls, Taste and Odor, Other
Buttonwood Brook (MA95-13)	16				Fecal Coliform
Clarks Cove (MA95-38)	16				Fecal Coliform, PCB Fish tissue
New Bedford Inner Harbor (MA95-42)	146	X	X	X	(Debris/floatables/ trash), Fecal Coliform, PCB in fish tissue, Other
Outer New Bedford Harbor (MA95-63)	32	X	X		Estuarine Bioassessments, Fecal Coliform, PCB in Fish tissue, Other
Buttonwood Park Pond (MA95020)	1				N/A
Sassaquin Pond (MA62232)	10				Excess algal growth, Fecal Coliform, Taste and Odor
Copper Brook	7				N/A
Nash Pond	3				N/A



Waterbody segment that receives flow from MS4	# Outfalls/ Interconnections	Dissolved Oxygen/ DO Saturation	Nitrogen	Oil & Grease/ PAH	Other pollutants causing impairments
Brooklawn Brook	2				N/A
Paskamanset River (MA95-11)	21				N/A
Acushnet Cedar Swamp	33				N/A
Deep Brook	2				N/A
Wetlands/Open Space	27				N/A
Turner's Pond (MA95151)	0				Mercury in Fish tissue
<b>Total Number of Outfalls</b>	<b>355</b>				

## Section 4

### Minimum Control Measures

#### MCM 1: Public Education

In total, 7 educational messages were completed during the reporting period. The City attended a limited number of events due to COVID-19, but was able to provide outreach at school programs such as Sea Lab.

##### **BMP: 1-1: Nitrogen Brochures/Pamphlets**

###### *Message Description and Distribution Method*

A Nitrogen lawn management pamphlet was developed and displayed in the Parks, Recreation & Beaches main office and distributed at public events.

###### *Targeted Audience*

Businesses/Commercial/Institutional & Residential

###### *Responsible Department/Parties*

Departments of Public Infrastructure and Parks, Recreation and Beaches

###### *Measurable Goals*

Distribute pamphlet during the March/April timeframe and made available continuously through the spring and summer months at the DPI office.

###### *Message Date(s)*

The pamphlet was displayed in the spring of 2020 and continuously available at the DPI office during the spring and summer months. The pamphlets regarding leaf waste were available at the DPI office starting in the fall of 2019 and remain available presently.

###### *Comments*

This message was completed for Appendix H requirements and is not different than what was proposed in the NOI.

##### **BMP 1-2: Bacterial/Nitrogen Brochures/Pamphlets**

###### *Message Description and Distribution Method*

A Scoop the Poop pamphlet was developed. The pamphlet was distributed to dog owners at the time of issuance or renewal of dog license. Pamphlets were disseminated to residents and businesses along the Inner & Outer Harbors local events and discussed at school educational presentations.

Proper disposal of animal feces is also discussed with students at school presentations.

###### *Targeted Audience*

Residential

*Responsible Department/Parties*  
Department of Public Infrastructure

*Measurable Goals*

Distribute pamphlet to dog owners at the time of issuance or renewal of a dog license. Pamphlets are also available at the DPI office as well as at various public events throughout the year.

*Message Date(s)*

The pamphlet was continuously available at City Hall, and the DPI office with emphasis on distributing during spring and summer months of 2020 with pamphlets being handed out at time of each dog registration.

*Comments*

This message was completed for Appendix H requirements and is not different than what was proposed in the NOI.

**BMP: 1-3: Leaf Litter Brochures/Pamphlets**

*Message Description and Distribution Method*

A pamphlet describing proper disposal of leaf litter poster was developed and displayed at DPI office at the Billing Window and distributed at various public events.

*Targeted Audience*

Businesses/Commercial/Institutional

*Responsible Department/Parties*

Departments of Public Infrastructure and Parks, Recreation and Beaches

*Measurable Goals*

Distribute pamphlet during the August/September/October timeframe

*Message Date(s)*

The pamphlets were available continuously at the DPI office and distributed at public events between August 2019 through June 2020

*Comments*

This message was completed for Appendix H requirements and is not different than what was proposed in the NOI.

**BMP: 1-4: Dumpster Management Brochures/Pamphlets**

*Message Description and Distribution Method*

A pamphlet describing good stormwater housekeeping practices, including dumpster management, was developed. Pamphlets will be distributed during IPP inspections, FOG inspections (leave at BOH office) and at issuance of permit for temporary dumpsters.



*Targeted Audience*

Businesses/Commercial/Institutional

*Responsible Department/Parties*

Department of Public Infrastructure and Board of Health

*Measurable Goals*

Distribute pamphlet to the target audience at least once over the permit term.

*Message Date(s)*

The pamphlet was distributed to restaurants throughout the reporting year during FOG inspections.

*Comments*

This message is not different than what was proposed in the NOI.

**BMP: 1-5: Rain Barrel Program**

There was no rain barrel program in 2020 due to restrictions of COVID-19. The rain barrel program will resume at a future date and in compliance with COVID-19 guidance.

*Message Description and Method of Distribution*

A pamphlet promoting the City's rain barrel program was developed. It will be distributed at the DPI counter.

*Targeted Audience*

Residential & Business/Commercial/Institutional

*Responsible Department/Parties*

Department of Public Infrastructure

*Measurable Goals*

The pamphlets are distributed annually during the rain barrel program period; typically in the spring.

*Message Date(s)*

No rain barrel program in 2020 due to COVID.

*Comments*

The subject of the public message has changed from what was originally submitted in the NOI.

**BMP: 1-6: Proper Disposal Brochures/Pamphlets**

*Message Description and Method of Distribution*

An informational brochure including information on the proper disposal of water from car washing, dog washing, pools and sump pumps was developed.

Proper disposal of water from car/bike washing, dog washing, patio washing, sidewalk washing, and driveway washing is discussed during school presentations and summer camp presentations.

*Targeted Audience*

Residential

*Responsible Department/Parties*

Department of Public Infrastructure

*Measurable Goals*

Distribute pamphlet to the target audience at least once over the permit term.

*Message Date(s)*

The pamphlets were distributed as door hangers in different neighborhoods throughout the year in response to complaints.

*Comments*

The subject of the public message has changed from what was originally submitted in the NOI.

**BMP: 1-7: Hazardous Waste Disposal Day Brochures/Pamphlets**

*Message Description and Distribution Method*

An informational brochure encouraging residents and industries to participate in hazardous waste disposal days was developed.

*Targeted Audience*

Residents, Business/Commercial/Institutional, and Industrial

*Responsible Department/Parties*

Department of Public Infrastructure

*Measurable Goals*

Distribute pamphlet to the target audience at least once over the permit term.

*Message Date(s)*

The pamphlets were made available at the DPI office during the reporting period.

*Comments*

The subject of the public message has changed from what was originally submitted in the NOI.

**BMP: 1-8: City Construction Standards Meeting**

There was no City Construction Standards meeting in 2020 due to restrictions of COVID-19. The City will resume annual Construction Standard meetings at a future date and in accordance with COVID-19 guidance.

*Message Description and Distribution Method*

The City will coordinate a meeting of contractors allowed to work in the City to discuss existing specifications and work requirements, including stormwater requirements.

*Targeted Audience*

Developers/Contractors

*Responsible Department/Parties*

Department of Public Infrastructure

*Measurable Goals*

Hold annual meeting.

*Message Date(s)*

The meeting did not take place in 2020 due to COVID.

*Comments*

This BMP as originally submitted in the NOI consisted of distributing a pamphlet. However, it was felt that in-person discussion would be more effective.

**BMP: 1-9: Parking Lot Care and Maintenance Brochures/Pamphlets**

*Message Description and Distribution Method*

A pamphlet including information on the care and proper maintenance of parking lots was developed.

*Targeted Audience*

Business/Commercial/Institutional & Industrial

*Responsible Department/Parties*

Department of Public Infrastructure

*Measurable Goals*

The pamphlet will be distributed during a later permit year.

*Message Date(s)*

Pamphlets were made available at the DPI office throughout the reporting period.

*Comments*

The subject of the public message has changed from what was originally submitted in the NOI.

## **MCM 2: Public Participation**

The Stormwater Management Program is publicly available. Meetings and reviews that the public had the option to attend were posted in accordance with state public notice requirements (MGL Chapter 30A, Sections 18-25). This opportunity matches what was proposed in the NOI.

## MCM 3: Illicit Discharge Detection and Elimination

### Sanitary Sewer Overflows (SSOs)

Data pertaining to Sanitary Sewer Overflows is attached to the email submission (Attachment A).

During this reporting period:

- Number of SSOs identified in the MS4 system: 6
- Number SSOs removed: 6

SSO Record Keeping:

- Reporting Period (Last 5-years): 2014 – June 2020
- Number SSOs identified in the MS4 system: 40
- Number of SSOs removed: 40

### MS4 System Mapping

The City's MS4 includes the following elements:

- Outfalls and receiving waters
- Open channel conveyances
- Interconnections with other MS4s
- Municipally-owned stormwater treatment structures
- Receiving waterbodies and indication of use impairments
- Initial catchment delineations
- Drainage pipes, manholes, and catch basins
- Sanitary and combined sewer pipes, manholes, and catch basins

### Screening of Outfalls/Interconnections

Outfall monitoring results from this reporting period are attached to the email submission (Attachment D). The results 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 analyses.

- Outfalls/interconnections screened during this reporting period: 1% (3 of 355)
- To date, total outfalls/interconnections screened: 49% (177 of 355)

### Catchment Investigations

Data collected for catchment investigations during this reporting period are attached to the email submission (Attachment E).

- Catchment investigations completed during this reporting period: 2% (6 of 355)
- To date, total catchments investigated: 2.5% (9 of 355)



## IDDE Progress

During this reporting period:

- Number of illicit discharges identified: 11
- Number of illicit discharges removed: 7
- Estimated volume of illicit discharges removed: 1,700 gpd

To date (from July 2018 to June 2020):

- Number of illicit discharges identified: 11
- Number of illicit discharges removed: 7
- Estimated volume of illicit discharges removed: 1,700 gpd

Work orders for the removal of illicit discharges will remain in Lucy.

The few illicit discharges that remain are on Kearsage St. and Mathew St. During the removal process on Kearsage St., City crews encountered unanticipated obstacles (e.g. large storm-drain pipe and proximity to sewer main) during the first attempt of removal. The removal of these illicit discharges will require accommodation of the large storm-drain pipe and lateral distance to the sewer main from the point of connection.

The connection on Mathew St. flows to the sewer system via an open over-under manhole. Given system complexities, City crews are working to develop an approach to remove the connection and connect it directly to the sanitary sewer and seal the open over-under.

## Employee Training

IDDE staff (Dennis Souza and Wayne Perry) attended IDDE training provided by Central Massachusetts Regional Stormwater Coalition and Fuss & O'Neill in May 2020. A handout presentation on the IDDE program, including how to recognize illicit discharges and SSOs was updated, printed and distributed to 139 DPI employees throughout June 2020.

## MCM 4: Construction Site Stormwater Runoff Control

During this reporting period:

- Number of site plan reviews completed: 23
- Number of Active Construction Sites Over 1-Acre: 3
- Number of inspections completed: 39
- Number of enforcement actions taken: 4

Construction site sediment and erosion control inspections and corrective action inspections are collected with the Survey123 application and maintained in esri™ ArcGIS.

## **MCM 5: Post-Construction Stormwater Management in New Development and Redevelopment**

### **Ordinance Development**

Describe the status of post-construction ordinance required to be completed in Year 3 of the permit term (in accordance with the MS4 permit modifications made in 2020):

In 2017 the City passed an ordinance and associated stormwater rules and regulations giving authority to enforce and implement aspects of the MS4 Permit associated with reduction of pollutants to the MS4 system and reduction in peak flows associated with new development and redevelopment projects. Legal action delayed the promulgation of ordinance changes. The rules and regulations will be updated to:

- Include supplemental requirements included in the 2016 MS4 permit.
- Provide updates based on lessons learned from the initial several years of ordinance enforcement.

### **As-built Drawings**

The City's existing Stormwater Rules and Regulations (SMRR) currently requires the submittal of as-built drawings.

### **Street Design and Parking Lots Report**

The City continues the process of reviewing available ordinances and planning documents. The report will be completed by Year 4.

### **Green Infrastructure Report**

The City continues the process of reviewing available ordinances and planning documents. Several pilot green infrastructure projects have been implemented including rain gardens and tree filter boxes. The report will be completed by Year 4.

### **Retrofit Properties Inventory**

The City continues the process of identifying City-owned parcels and gathering GIS information (e.g., soil types, impervious area) that will be used to evaluate retrofit opportunities. The report will be completed by Year 4.

## **MCM 6: Good Housekeeping**

### **Catch Basin Cleaning**

The City has continued to develop and alter its system for tracking catch basin investigations and work. In the past year, the City has developed forms in the Survey123 application to conduct its catch basin inspections. We have also created two different types of inspections, one being a 'visual inspection', and the other being a 'physical inspection'. As an effort to properly locate every catch basin, with the Global Navigation Satellite System (GNSS), in the MS4 and combined sewer system areas, the visual (drive by) inspection was created. The physical inspection is an

actual assessment of basin layout, grit amount (i.e. more or less than 50% full), and physical condition of the basin. Catch basin cleaning work orders will remain in Lucity.

During this reporting period:

- Number of catch basins visually inspected: 2,515
- Number of catch basins physically inspected: 786
- Number of catch basins cleaned: 326
- Volume or mass of material removed: 724 cubic yards
- Number of catch basins in MS4: 2,515

No duplicate inspections were completed within the year to identify any catch basins with sumps more than 50 percent full during two consecutive routine inspections/cleaning events.

The City's combined sewer and drainage systems are intricately intertwined. The catch basin cleaning data presented here is for streets that are physically located within the 2010 Census MS4 Regulated Area regardless of whether they discharge to a drainage or combined sewer system.

As noted above, all catch basins in the City were GNSS located. In addition to the 2,515 MS4 catch basins, the City located 3,284 catch basins in the combined sewer system and partially separated areas. In total there are 5,799 catch basins in the City.

## Street Sweeping

Written procedures for sweeping streets and municipal-owned lots have been developed.

During this reporting period:

- Curb miles of streets cleaned: 10,296 miles
- Material removed: 2,626 yards

Every street and municipal owned lot in the City was cleaned at a minimum of twice during the reporting period and is reflected in the above data. Street sweeping is tracked using driver logs.

Note: The City's combined sewer and drainage systems are intricately intertwined. The street sweeping data presented here is for streets that are physically located within the 2010 Census MS4 Regulated Area regardless of whether they discharge to a drainage or combined sewer system.

## Winter Road Maintenance

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

The City revised the written procedures for winter road maintenance including the storage of salt and sand (formerly memorialized in 2019).

## **Inventory of Permittee-Owned Properties**

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

The City has completed the inventory of permittee-owned properties.

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

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

The City has created and finalized standard operating procedures (SOPs) for parks and open spaces, buildings and facilities, and vehicles and equipment.

## **Stormwater Pollution Prevention Plan (SWPPP)**

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

The SWPPPs have been completed.

During this reporting period, 0 site inspections were completed for facilities that require a SWPPP.

## **O&M Procedures for Stormwater Treatment Structures**

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

The City has completed written procedures for maintenance of stormwater treatment structures.

## **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 previously, where the data is being used to inform permit compliance or permit effectiveness are not applicable:

- N/A

### **Additional Information**

Optional: enter additional information relevant to your SWMP implementation during the reporting period. Include any BMP modifications made by the MS4 if not previously discussed:

- N/A



## COVID-19 Impacts

The largest impact to our MS4 program due to COVID-19 was seen in our Public Outreach schedules. Unfortunately, all City events beginning on March 10, 2020 through June 30, 2020 were cancelled. In lieu of face-to-face meetings, the City did its best to utilize social media to continue outreach efforts to its residents and commercial/industrial businesses. In regard to inspections, sweeping and basin cleanings; COVID-19 at times reduced our work staff; however, the City met its anticipated requirements.

## Activities Planned for Next Reporting Period

The SWMP has been, or will be, updated to comply with applicable permit requirements including but not limited to the Year 3 requirements summarized below. The SWMP also has been, or will be, updated to comply with applicable permit requirements for impaired waters and TMDL requirements, not included below.

- 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
- Promulgate Revisions to the New Development and Redevelopment Ordinance and associated Stormwater Rules and Regulations

## 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 receiving waters
- Annual training to employees involved in IDDE program
- Update inventory of known locations where SSOs have discharged to the MS4 in the last 5 years
- Continue public education and outreach program to the extent feasible given COVID-19 restrictions
- 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
- Conduct site inspection of construction sites as necessary
- Inspect and maintain stormwater treatment structures
- Log catch basins cleaned or inspected
- Sweep curbed streets at least twice 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



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In December 2019, the City received an Administrative Order from the EPA which requires accelerated MS4 action. The following summarizes the Administrative Order MS4 action to be completed in the Year 3 MS4 reporting period (July 1, 2020 through June 30, 2021):

- IDDE investigation of the area tributary to DP-200

## Section 5

# 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: Jamie Ponte

Title: DPI Commissioner

Signature: 

Date: 9/28/2020