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: City of Northampton

EPA NPDES Permit Number: MAR041016

Primary MS4 Program Manager Contact Information

Name: Donna LaScaleia Title: Director

Street Address Line 1: 125 Locust St.

Street Address Line 2:

City: Northampton State: MA Zip Code: 01060

Email: dlascaleia@northamptonma.gov Phone Number: (413)-587-1570

Stormwater Management Program (SWMP) Information

SWMP Location (web address): http://northamptonma.gov/1998/Stormwater-Management-Program

Date SWMP was Last Updated: 6/27/2019

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

<u>Impairment</u>	<u>(s)</u>			
	☑ Bacteria/Pathogens☑ Solids/ Oil/ Grease (H	☐ Chloride ydrocarbons)/ Metal	☐ Nitrogen	☐ Phosphorus
TMDL(s)				
In State:	☐ Assabet River Phosph	orus 🗌 Bact	eria and Pathogen	☐ Cape Cod Nitrogen
	Charles River Watersh	ed Phosphorus	☐ Lake and Pond	l Phosphorus
Out of State:	☐ Bacteria/Pathogens	☐ Metals	Nitrogen	☐ Phosphorus
			C	ear Impairments and TMDLs
Year 2 Requi	rements leted Phase I of system map	pping		
Vaar 2 Dagui	inamenta.			
	leted Phase I of system map	pping		
	oped a written catchment in		•	
	oped written procedures to a ion and maintenance of con			
⊠ Enclos	sed or covered storage piles	of salt or piles cont	aining salt used for d	eicing 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			
1 1	oped an inventory of all per ngs and facilities, and vehic		-	
	leted a written program for	MS4 infrastructure	maintenance to reduc	e the discharge of pollutants
operat	oped written SWPPPs, included facilities: maintenance gies where pollutants are exp	arages, public work		ng permittee owned or ons, and other waste handling

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 City of Northampton has required As-built drawings and Long Term Operation, Inspection and Maintenance Agreements (recorded at the Registry of Deeds) as a condition of every Stormwater Management Permit issued since 2004 based on requirements in the current Stormwater Management Ordinance (Chapter

281 of the Northampton Code of Ordinances). Additionally, many smaller development projects (<1 acre) have also been required to record a Stormwater O&M Agreement through Northampton Planning Board permit conditions. Northampton is working to revise the Stormwater Management Ordinance and regulations as necessary to be consistent with model language prepared by the Pioneer Valley Planning Commission for As-built and O&M requirements. We anticipate adoption of this language in the coming year along with the other updates required for local stormwater management permit standards under the MS4 permit - Section 2.3.6.

- -A draft operation and maintenance procedures for parks and open space, buildings and facilities, and vehicles and equipment has been developed but due to COVID-19 related issues and limitations these procedures will be finalized in year 3 and added to the SWMP.
- -A draft inventory of all permittee owned facilities in the categories of parks and open space, buildings and facilities, and vehicles and equipment has been developed but due to COVID-19 related issues and limitations these procedures will be finalized in year 3 and added to the SWMP.
- -A draft written SWPPP has been developed for a permittee owned maintenance garage, public works yard, and transfer station but due to COVID-19 related issues and limitations these procedures will be finalized in year 3 and added to the SWMP.

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:

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

<u>Annual Requirements</u>

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:

-The City of Northampton and the Connecticut River Stormwater Committee promoted information on Facebook for owners of septic systems regarding the SepticSmart Week in September 2019 and ongoing information on the Think Blue Connecticut River website. A letter will be sent to all owners of septic systems from the Northampton Health Department in year 3 once the list of properties with septic systems in Northampton has been finalized.

Nitrogen (Combination of Impaired Waters Requirements and TMDL Requirements as Applicable)

Annual	Reg	uirements

Public	Education	and O	utraach*
I uouc	Laucanon	unu U	unreach

- Distributed 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
- 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 Perr	mit
ш	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 was tracked and the nitrogen removal by the BMP was
estimated consistent with Attachment 1 to Appendix H. 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 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:

- -The DPW is working toward meeting the requirement to sweep all curbed roadways and parking lots a minimum of two times per year. Normally all curbed roadways and parking lots are swept once and roadways in the main commercial/downtown areas are swept at least two times per year and some monthly but due to COVID-19 constraints this level of sweeping has not been possible.
- -Existing BMPs are continuing to be inspected and assessed and the estimate of nitrogen removal will be completed in Year 3 when all the information has been gathered. Due to COVID-19 field work was delayed to confirm details of the BMPs.

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

C No

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

- -Additional outfalls within the MS4 area have been added to the list.
- -The Mill River (MA34-28) in the final version of the Massachusetts Year 2016 Integrated List of Waters (December 2019) was revised to Category 5 with an impairment for Escherichia Coli (E. Coli).

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

MENT: I ublic Education
Number of educational messages completed during this reporting period: 16
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. Think Blue Connecticut River Website Message Description and Distribution Method:
https://thinkblueconnecticutriver.org/wp-content/uploads/2020/09/CT-River-SWC-Annual-Report-Narrative-MCM-1pdf
Targeted Audience: Residents, businesses, institutions and commercial facilities, developers, and industrial fa
Responsible Department/Parties: Connecticut River Stormwater Committee
Measurable Goal(s):
Message Date(s):
Wiessage Date(s).
Message Completed for: Appendix F Requirements Appendix H Requirements
Was this message different than what was proposed in your NOI? Yes C No C
If yes, describe why the change was made:
BMP: 2. COVID-19 Litter
Message Description and Distribution Method:
https://thinkblueconnecticutriver.org/wp-content/uploads/2020/09/CT-River-SWC-Annual-Report-Narrative-MCM-1pdf
Targeted Audience: Residents, and business, institutional and commercial facilities
Responsible Department/Parties: Connecticut River Stormwater Committee
Measurable Goal(s):

City of Northampton Page 8
Message Date(s):
Message Completed for: Appendix F Requirements Appendix H Requirements
Was this message different than what was proposed in your NOI? Yes \(\cap \) No \(\cap \) If yes, describe why the change was made:
BMP: 3. Cigarette Butts Message Description and Distribution Method:
https://thinkblueconnecticutriver.org/wp-content/uploads/2020/09/CT-River-SWC-Annual-Report-Narrative-MCM-1pdf
Targeted Audience: Residents
Responsible Department/Parties: Connecticut River Stormwater Committee
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 O No O If yes, describe why the change was made:
BMP: 4. Dumpster Waste and Avoiding Contaminated Flows Message Message Description and Distribution Method:
https://thinkblueconnecticutriver.org/wp-content/uploads/2020/09/CT-River-SWC-Annual-Report-Narrative-MCM-1pdf
Targeted Audience: Businesses, institutions and commercial facilities
Responsible Department/Parties: Connecticut River Stormwater Committee
Measurable Goal(s):
Message Date(s):

Appendix F Requirements

Appendix H Requirements

Message Date(s):

Message Completed for:

Was this message different than what was proposed in your NOI? Yes O No O	
If yes, describe why the change was made:	
BMP: 7. Fleet Maintenance to Avoid Spills and Leaks	
Message Description and Distribution Method: https://thinkblueconnecticutriver.org/wp-content/uploads/2020/09/CT-River-SWC-Annual-Report-N MCM-1pdf	arrative-
Targeted Audience: Industrial facilities	
Responsible Department/Parties: Connecticut River Stormwater Committee	
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 O No O	
If yes, describe why the change was made:	
BMP: 8. Proper Disposal of Leaf Litter	
Message Description and Distribution Method:	
https://thinkblueconnecticutriver.org/wp-content/uploads/2020/09/CT-River-SWC-Annual-Report-NMCM-1pdf	arrative-
Targeted Audience: Residents	
Responsible Department/Parties: Connecticut River Stormwater Committee	
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 O No O	

Appendix F Requirements

Was this message different than what was proposed in your NOI?

Message Completed for:

Appendix H Requirements

Yes No

City of Northampton	Page 15
If yes, describe why the change was made:	
BMP:[Message name here]	
Message Description and Distribution Method:	
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 O No O	
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 Mana Program (SWMP) during this reporting period:	agement
The SWMP was made available to the public for review and comment starting in June 2019 on the DF website and a hard copy available for review at the DPW administration office. A Public Notice was r Daily Hampshire Gazette on 9/17/2019.	
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 -Northampton DPW continued to offer rain barrels at a discounted price to City residents and 27 rain were purchased.	

City of Northampton	Page 16

-The annual household hazardous waste collection in Northampton was delayed and occurred on August 12, 2020 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: 0
Number of SSOs removed: 0
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
- ✓ 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 Northampton MS4 map is complete for stormwater outfalls, receiving waters, waterbody impairments, open channel conveyances, interconnections with other MS4s, catch basins and other intakes, manholes, pipes, sanitary sewer system, municipally-owned stormwater treatment structures and initial delineation of outfall catchment areas. All this information is continually updated as necessary and further work to refine the initial catchment delineation will be completed in year 3 of the permit.

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: 56

Catchment	Investigat	tions

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: 0

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:

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: 0

Number of illicit discharges removed: 0

Estimated volume of sewage removed: 0

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: 20

Total number of illicit discharges removed: 20

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

Employee Training

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

3 DPW staff attended the Central Massachusetts Regional Stormwater Coalition IDDE Training Workshop conducted by Fuss & O'Neill on May 5 and 7, 2020.

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: 17

Number of inspections completed: 43

Number of enforcement actions taken: 3

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.

- O 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 City of Northampton has required As-built drawings and Long Term Operation, Inspection and Maintenance Agreements (recorded at the Registry of Deeds) as a condition of every Stormwater Management Permit issued since 2004 based on requirements in the current Stormwater Management Ordinance (Chapter 281 of the Northampton Code of Ordinances). Additionally, many smaller development projects (<1 acre) have also been required to record a Stormwater O&M Agreement through Northampton Planning Board permit conditions. Northampton is working to revise the Stormwater Management Ordinance and regulations as necessary to be consistent with model language prepared by the Pioneer Valley Planning Commission for As-built and O&M requirements. We anticipate adoption of this language in the coming year along with the other updates required for local stormwater management permit standards under the MS4 permit - Section 2.3.6.

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:

The City of Northampton is on track to complete this work for Year 4 and has previously adopted a Green Streets and Infrastructure Policy. The City will further review current street design and parking lot guidelines and requirements and use several resources to help in developing the report, including EPA's technical support document entitled, "Assessing Street and Parking Design Standards to Reduce Excess Impervious Cover in New Hampshire and Massachusetts," at the following link: https://www3.epa.gov/region1/npdes/stormwater/assets/pdfs/ImperviousAssessment.pdf

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:

The City of Northampton is on track to complete this work for Year 4 and has already taken steps to remove barrier's to green infrastructure practices in ordinances and regulations. The City will continue reviewing ordinances and regulations and will use several resources to help in developing the report, including MassAudubon's checklist entitled "Supporting LID in Your Community: How to Compare Local Land Use Regulations with Best Practices" at https://www.epa.gov/npdes-permits/stormwater-tools-new-england#pcsm; and guidance developed by the Pioneer Valley Planning Commission within the Green Infrastructure Toolkit at: http://www.pvpc.org/content/green-infrastructure-toolkit. Among these tools, there is a 2014 checklist that consolidates guidance from three excellent checklists: the Center for Watershed Protection's Code and Ordinance Worksheet, the U.S. Environmental Protection Agency's Water Quality Scorecard, and the Metropolitan Area Planning Council's Low Impact Development Toolkit Checklist for Regulatory Review.

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 City of Northampton is on track to complete this work for Year 4 and has already completed an inventory of green infrastructure opportunities on City owned properties, developed a plan to add small BMP structures in the City right of way in a flood prone watershed area and developed conceptual and final green

infrastructure BMP designs on City properties through an MVP Action Grant.

MCM6: Good Housekeeping

Catch	Basin	Clea	ning

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: 594

Number of catch basins cleaned: 594

Total volume or mass of material removed from all catch basins: 490.18

tons

Below, report on the total number of catch basins in the MS4 system.

Total number of catch basins: 3,882

If applicable:

Report on the actions taken if a catch basin sump is more than 50% full during two consecutive routine inspections/cleaning events:

If a catch basin sump is more than 50% full during two consecutive routine inspections/cleaning events, the catch basin will be placed on an accelerated inspection and cleaning schedule.

Street Sweeping

Report on street sweeping comp	leted during this re	eporting period using one o	of the three metrics below.
--------------------------------	----------------------	------------------------------------	-----------------------------

(•)	Number of miles cleaned: 205	
C	Volume of material removed:	[Select Units]
	Weight of material removed:	[Select Units]

O&M Procedures and Inventory of Permittee-Owned Properties

Below, check all that apply.
The following permittee-owned properties have been inventoried:
Parks and open spaces
☐ Buildings and facilities
☐ Vehicles and equipment

The following O&M	1 procedures for	permittee-owned	properties have	been completed:
-------------------	------------------	-----------------	-----------------	-----------------

Parks and	open spaces
Buildings	and facilities

City of Northampton Page 21
☐ 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: 2
Describe any corrective actions taken at a facility with a SWPPP:
The fueling facility at the DPW Highway Garage was reconstructed in 2019-2020 and includes improvements for stormwater including a roof canopy which drains to subsurface infiltration and grading to prevent stormwater from flowing onto fueling the area.
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:
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 City of Northampton has been very proactive in response to COVID-19 and has implemented measures to keep employees and residents safe. Unfortunately some of these measures have restricted the ability of City staff to complete requirements of the MS4 permit in the time-frame previously specified in the SWMP. For example limitations on the use of shared office space, lab facility, vehicles, equipment, access to paper files and records, restrictions on overtime and the need to divert staff attention elsewhere has severely limited the ability of the staff to complete all the work outlined in the SWMP particularly related to outfall inspections, catchment investigations, catch basin cleaning, street sweeping, site inspections, interdepartmental planning and other tasks. We are finding ways to work around these constraints and making every effort to meet the requirements of the MS4 Permit but it may not be feasible to maintain the schedule that was previously specified in the SWMP.

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:

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:	Donna LaScaleia	Title: DPW Director	
Signature:	[Signators may be a duly authorized representative]	Date: 9-17-20	