# **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 Organi                          | zation: Town of Sutton | 1        |                      |          |
|----------|--|------------------------|----------|----------------------|----------|
| EPA N    | IPDES Permit Number: M                             | AR041241               |          |                      |          |
| Prima    | ry MS4 Program Manag                               | er Contact Informati   | on       |                      |          |
| Name:    | Matt Stencel                                       |                        | Title:   | Highway Superin      | tendent  |
| Street   | Address Line 1: 4 Uxbrida                          | ge Road                |          |                      |          |
| Street   | Address Line 2: N/A                                |                        |          |                      |          |
| City:    | Sutton   | State: MA              | Zip Co   | ode: 01590           |          |
| Email:   | mstencel@town.sutton.m                             | a.us                   | Phor     | ne Number: (508) 8   | 865-8743 |
|          | water Management Prog<br>P Location (web address): | ram (SWMP) Inform      |          | es/g/files/vyhlif390 | 01/f/    |
| 2 M MI   | Location (web address):                            | uploads/2019_sutton_   | swmp_    | plan_final.pdf       |          |
| Date S   | WMP was Last Updated:                              | June 30, 2019          |          |                      |          |
| If the S | SWMP is not available on                           | the web please provid  | e the ph | ysical 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: <a href="https://www.epa.gov/tmdl/region-1-impaired-waters-and-303d-lists-state">https://www.epa.gov/tmdl/region-1-impaired-waters-and-303d-lists-state</a>

Impairment(s)

× Bacteria/Pathogens Chloride Nitrogen × Phosphorus

× Solids/ Oil/ Grease (Hydrocarbons)/ Metals

TMDL(s)

In State: Assabet River Phosphorus Bacteria and Pathogen Cape Cod Nitrogen

Charles River Watershed Phosphorus

Lake and Pond Phosphorus

Out of State: Bacteria/Pathogens Metals X 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
- X 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
- Eveloped 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
- imes 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 - mapping of open channel conveyances and any newly located outfalls is ongoing. Mapping interconnections with other MS4s (e.g. DOT) is ongoing, and it is expected that this will continue as part of DOT's own mapping efforts to be completed under a future TS4 permit.

As-Builts and Long-Term O&M - the Town is working on incorporating procedures for submittal of as-builts and require long term operation and maintenance as part of its stormwater regulatory updates to be completed as part of the Year 3 requirements under EPA's pending updated permit schedule.

### **Annual Requirements**

- $\times$  Provided an opportunity for public participation in review and implementation of SWMP and complied with State Public Notice requirements
- imes Kept records relating to the permit available for 5 years and made available to the public
- X The SSO inventory has been updated, including the status of mitigation and corrective measures implemented
  - O This is not applicable because we do not have sanitary sewer
  - This is not applicable because we did not find any new SSOs
  - O The updated SSO inventory is attached to the email submission
  - O 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
- imes 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:

IDDE Training - training was not performed during this permit year due to COVID-19 social distancing requirements and limited staff availability.

Outfall Inventory and Ranking - 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)

<u>Annual Requirements</u>

Public Education and Outreach\*

- $\times$  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:

Public Education and Outreach - during Year 2, the Town developed a comprehensive public education program. In part, this program consisted of website text with a permit overview, specific messages and topics for each of the Town's four audiences, links to external websites, and links for download of approximately 20 different outreach brochures. The Town is still working to bring this website online. The Town also distributed flyers with all pet registrations and renewal applications. Additional public education messaging was not completed during Year 2 in part due to the COVID-19 outbreak.

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

### **Annual Requirements**

Public Education and Outreach\*

Distributed an annual message in the spring (April/May) that encourages the proper use and disposal of grass clippings and encourages the proper use of slow-release fertilizers

- X Distributed an annual message in the summer (June/July) encouraging the proper management of pet waste, including noting any existing ordinances where appropriate

  Distributed an annual message in the fall (August/September/October) encouraging the proper disposal of leaf litter
- \* Public education messages can be combined with other public education requirements as applicable (see Appendix H and F for more information)

Good Housekeeping and Pollution Prevention for Permittee Owned Operations
Increased street sweeping frequency of all municipal owned streets and parking lots subject to Permit part 2.3.7.a.iii.(c) to a minimum of two times per year (spring and fall)

### Potential structural BMPs

Any structural BMPs 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.

| $\bigcirc$ | The BMP information is attached to the email submission    |
|------------|--|
| $\bigcirc$ | 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:

Public Education and Outreach - during Year 2, the Town developed a comprehensive public education program. In part, this program consisted of website text with a permit overview, specific messages and topics for each of the Town's four audiences, links to external websites, and links for download of approximately 20 different outreach brochures. The Town is still working to bring this website online. The Town also distributed flyers with all pet registrations and renewal applications. Additional public education messaging

was not completed during Year 2 in part due to the COVID-19 outbreak.

Street Sweeping - streets were swept only once during Year 2.

Structural BMPs - BMPs pollutant removal has not yet been computed, however, it is expected that this will be completed during Year 4 as part of a Nitrogen Source Identification Report for Long Island Sound.

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

# **Annual Requirements**

Public Education and Outreach\*

Distributed an annual message in the spring (April/May) encouraging the proper use and disposal of grass clippings and encouraging the proper use of slow-release and phosphorus-free fertilizers

- X 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
  - Distributed an annual message in the fall (August/September/October) encouraging the proper disposal of leaf litter
- \* Public education messages can be combined with other public education requirements as applicable (see Appendix H and F for more information)

Good Housekeeping and Pollution Prevention for Permittee Owned Operations

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

### Potential structural BMPs

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

| $\bigcirc$ | The BMP information is attached to the email submission    |
|------------|--|
| $\bigcirc$ | 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:

Public Education and Outreach - during Year 2, the Town developed a comprehensive public education program. In part, this program consisted of website text with a permit overview, specific messages and topics for each of the Town's four audiences, links to external websites, and links for download of approximately 20 different outreach brochures. The Town is still working to bring this website online. The Town also distributed flyers with all pet registrations and renewal applications. Additional public education messaging was not completed during Year 2 in part due to the COVID-19 outbreak.

Street Sweeping - streets were swept only once during Year 2.

Structural BMPs - BMPs pollutant removal has not yet been computed, however, it is expected that this will be completed during Year 4 as part of a Phosphorus Source Identification Report for the Blackstone River.

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

# **Annual Requirements**

Good Housekeeping and Pollution Prevention for Permittee Owned Operations

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

| Optional: If you would like to describe progress made on any incomplete requirements listed above or provide  |
|---|
| any additional details, please use the box below:   |
| Street Sweeping - all streets were swept once during Year 2.  |
| Increased Sweeping for High Pollutant Loads - this was determined not to be necessary for the Town as these areas are not observed to accumulate more sediment and debris than other areas within the Town. |

| <i>Optional:</i> Use the box bel self-assessment: | ow to provide any additi | onal information you w | ould like to share as | s part of your |
|---|--------------------------|------------------------|-----------------------|----------------|
|   |                          |                        |                       |                |
|   |                          |                        |                       |                |
|   |                          |                        |                       |                |
|   |                          |                        |                       |                |

# 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?        |                 |                    |                   |                |                   |

YesNo

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

The Town has determined it is subject to the following additional TMDL and Impaired Waters requirements: -Blackstone River (MA51-03), bacteria water quality impairments requirements (Appendix H, Part III)

The following changes were made that do not affect TMDL and Impaired Waters requirements:
-Hudson Pond (MA42029), nutrient/eutrophication biological indicators impairment added to 303(d) list
-Sutton Falls (MA51163), harmful algal blooms impairment added to 303(d) list

# **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 <b>during this reporting period</b> : 3   |
|--|
| 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: Social Media |
| Message Description and Distribution Method:   |
| Provide relevant stormwater information to different audiences via social media.   |
| Targeted Audience: Residents, Businesses, Institutions, Commercial Facilities, Developers (construction)   |
| Responsible Department/Parties: Highway Department   |
| Measurable Goal(s):  |
| Post periodic updates onto Town's social media page.   |
| Message Date(s): Ongoing   |
| Message Completed for: Appendix F Requirements $\times$ Appendix H Requirements $\times$   |
| Was this message different than what was proposed in your NOI? Yes ○ No ●  |
| If yes, describe why the change was made:  |
|  |
| BMP:Pet Waste Informational Brochure   |
| Message Description and Distribution Method:   |
| Distributed information regarding the proper disposal of pet waste with all dog licenses and renewals.   |
| Targeted Audience: Residents   |
| Responsible Department/Parties: Town Clerk   |
| Measurable Goal(s):  |
| Provide informational brochure/flyer with all applications or renewals. The Town distributed approximately 1,100 flyers during Permit Year 2.  |

| Town of Sutton   | Page 9      |  |  |
|--|-------------|--|--|
| Message Date(s): Ongoing   |             |  |  |
| Message Completed for: Appendix F Requirements $\times$ Appendix H Requirements $\times$   |             |  |  |
| Was this message different than what was proposed in your NOI? Yes ○ No ●  |             |  |  |
| If yes, describe why the change was made:  |             |  |  |
|  |             |  |  |
| BMP:Distribute Brochures   |             |  |  |
| Message Description and Distribution Method:   |             |  |  |
| Brochures distributed at Town Hall with general information on stormwater.   |             |  |  |
| Targeted Audience: Residents   |             |  |  |
| Responsible Department/Parties: Highway Department   |             |  |  |
| Measurable Goal(s):  |             |  |  |
| Make informational flyers available to residents at several town-owned buildings.  |             |  |  |
| Message Date(s): Ongoing   |             |  |  |
| Message Completed for: Appendix F Requirements $\times$ Appendix H Requirements $\times$   |             |  |  |
| 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 M Program (SWMP) during this reporting period: | /lanagement |  |  |

SWMP Plan for Download - The Town has posted the SWMP Plan on Town website along with contact

information to allow for public comment.

| Fown of Sutton Page 10   |
|--|
| Was this opportunity different than what was proposed in your NOI? Yes ○ No ●  |
| Describe any other public involvement or participation opportunities conducted <b>during this reporting perio</b>  |
|  |
|  |
|  |
|  |
| 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   |
| ☐ Interconnections   |
| Municipally-owned stormwater treatment structures  |
|  |
|  |
| Optional: Describe any additional progress you made on your map during this reporting period or provide additional status information regarding your map:  |
| Phase I Mapping - all known outfalls, stormwater BMPs, and receiving waterbodies with impairments have   |
| been mapped to date. Initial catchment delineations have also been completed based on topographic mapping and available stormwater system information. Mapping of open channel conveyances and any newly located |
| outfalls is ongoing. Mapping interconnections with other MS4s (e.g. DOT) is ongoing, and it is expected that this will continue as part of DOT's own mapping efforts to be completed under a future TS4 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.

O The outfall screening data is attached to the email submission

| Town of Sutton Page 11  |
|---|
| The outfall screening data can be found at the following website:   |
| N/A, none completed to date   |
| Below, report on the number of outfalls/interconnections screened during this reporting period.  Number of outfalls screened: 0   |
| 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.  O The catchment investigation data is attached to the email submission  O The catchment investigation data can be found at the following website:  |
| N/A, none completed to date   |
| 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.  O The illicit discharge removal report is attached to the email submission  O The illicit discharge removal report can be found at the following website: |
| N/A, none found to date   |
| 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).

| Town of Sutton  | Page 12                                       |
|---|---|
| Total number of illicit discharges identified: 0  |   |
| Total number of illicit discharges removed: 0   |   |
| Optional: Provide any additional information for clarity regarding planned to be removed below:                               | ng illicit discharges identified, removed, or |
|   |   |
| <b>Employee Training</b>  |   |
| Describe the frequency and type of employee training conducted  | during the reporting period:                  |
| IDDE Training - training was not performed during this permit y requirements and limited staff availability.                  | vear due to COVID-19 social distancing        |
| MCM4: Construction Site Stormw<br>Below, report on the construction site plan reviews, inspections,<br>this reporting period. |   |
| Number of site plan reviews completed: 11   |   |
| Number of inspections completed: 14   |   |
| Number of enforcement actions taken: 3  |   |
| Optional: Enter any additional information relevant to construct enforcement actions:   | ion site plan reviews, inspections, and       |
|   |   |
|   |   |
|   |   |
|   |   |

# 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.

Town of Sutton Page 13 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 • 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 is working on incorporating procedures for submittal of as-builts and long term operation and maintenance as part of its stormwater regulatory updates to be completed 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 during this permit year. 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.

Describe any corrective actions taken at a facility with a SWPPP:

Not applicable, no corrective actions have been taken to date. Note that a SWPPP for the Highway Garage was completed in June 2020. Quarterly site inspections will begin during 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  |
|-----------------|---|
| C               | The results from additional reports or studies are attached to the email submission   |
| C               | The results from additional reports or studies can be found at the following website(s):  |
|                 |   |
|                 | oring or studies were conducted on your behalf or if monitoring or studies conducted by other reported to you, a brief description of the type of information gathered or received shall be |
| described belo  |   |
| N/A, not starte | ed yet.   |
|                 |   |
| Additional In   | formation   |
|                 | ter any additional information relevant to your stormwater management program implementation porting 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:

IDDE Training - training was not performed during this permit year due to COVID-19 social distancing requirements and limited staff availability.

Public Education and Outreach - additional public education messaging was not completed during Year 2 in part due to the COVID-19 outbreak.

Road Maintenance - COVID-19 forced the full closure of the Highway Department for approximately two to three weeks during the spring months. The Highway Department also had several weeks where they were forced to run smaller crews due to social distancing requirements. This delayed much of the Town's roadway and stormwater infrastructure maintenance program, such as street sweeping, catch basin cleaning. etc.

## **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

| <ul> <li>Continue investigations of catchments associated with Problem Outfalls</li> <li>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</li> </ul> |
|---|
| 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:

James Smith

Title: Town Manager

Signature:

[Signatory may be a duly authorized representative]

Date:

9/24/20