

Year 3 Annual Report

Massachusetts Small MS4 General Permit

Reporting Period: July 1, 2020-June 30, 2021

****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, 2020 and June 30, 2021 unless otherwise requested.

Part I: Contact Information

Name of Municipality or Organization: Avon

EPA NPDES Permit Number: MAR041089

Primary MS4 Program Manager Contact Information

Name: William Fitzgerald

Title: DPW Director

Street Address Line 1: 65 East Main Street

Street Address Line 2:

City: Avon

State: MA

Zip Code: 02322

Email: wfitzgerald@avon-ma.gov

Phone Number: (508) 588-0414

Stormwater Management Program (SWMP) Information

SWMP Location (web address): <https://www.avon-ma.gov/stormwater-dpw>

Date SWMP was Last Updated: June 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>

Impairment(s)

- ☒ Bacteria/Pathogens
 ☐ Chloride
 ☒ Nitrogen
 ☒ Phosphorus
☐ Solids/ Oil/ Grease (Hydrocarbons)/ Metals

TMDL(s)

- In State:**
☐ Assabet River Phosphorus
 ☒ Bacteria and Pathogen
 ☐ Cape Cod Nitrogen
☐ Charles River Watershed Phosphorus
 ☐ Lake and Pond Phosphorus
Out of State:
☐ Bacteria/Pathogens
 ☐ Metals
 ☐ Nitrogen
 ☐ Phosphorus

Clear Impairments and TMDLs

Next, check off all requirements below that have been completed. **By checking each box you are certifying that you have completed that permit requirement fully.** If you have not completed a requirement leave the box unchecked. Additional information will be requested in later sections.

Year 3 Requirements

- ☐ Inspected and screened all outfalls/interconnections (excluding Problem and Excluded outfalls)
☐ Updated outfall/interconnection priority ranking based on the information collected during the dry weather inspections as necessary
☒ Post-construction bylaw, ordinance, or other regulatory mechanism was updated and adopted consistent with permit requirements

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 3 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:

Dry Weather Outfall Screening - The Town began screening its outfalls for dry weather flows during Permit Year 3, however, screening has not yet been completed. The Town has hired a consultant to assist with training Town staff to complete this work using in-house personnel.

Update Outfall Inventory and Priority Ranking - Outfall inventory and priority ranking will be updated once dry weather inspections are completed. This is expected to occur during Permit Year 4.

Construction and Post-Construction Bylaw - The Town established both an Illicit Discharge Control bylaw (Chapter 151) and a Construction and Post-Construction Stormwater Management bylaw (Chapter 120) at the June 29, 2020 Town Meeting. The Town has also adopted accompanying "Stormwater Management Rules and Regulations" on November 20, 2020 which regulate construction projects greater than 1 acre. This bylaw and accompanying regulations meet all permit requirements for construction and post-construction requirements, including provisions for new/redevelopment to remove 90%/80% of total phosphorus and 60%/50% of total

suspended solid, respectively.

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 system map due in year 2 as necessary
- ☒ Enclosed all road salt storage piles or facilities and implemented winter road maintenance procedures to minimize the use of road salt
- ☐ Implemented SWPPPs for all permittee owned or operated maintenance garages, public works yards, transfer stations, and other waste handling facilities
- ☒ Updated inventory of all permittee owned facilities as necessary
- ☒ O&M programs for all permittee owned facilities have been completed and updated as necessary
- ☒ Implemented all maintenance procedures for permittee owned facilities in accordance with O&M programs
- ☒ Implemented program for MS4 infrastructure maintenance to reduce the discharge of pollutants
- ☒ Inspected all permittee owned treatment structures (excluding catch basins)

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.

SWPPPs - a preliminary review indicates that the Town has one eligible facility, the DPW Garage, as well as potentially a second eligible facility associated with material stockpiling. The Town has hired a consultant to assist with this task, anticipated to occur during Permit Year 4, likely during fall 2021.

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

Annual Requirements

*Public Education and Outreach**

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

** Public education messages can be combined with other public education requirements as applicable (see Appendix H and F for more information)*

Optional: If you would like to describe progress made on any incomplete requirements listed above or provide any additional details, please use the box below:

Public Education and Outreach - the Town is a member of the Neponset River Watershed Association which distributed a number of public education messages throughout the year. Targeted messages addressed topics related to pet waste collection, septic system maintenance, and other general stormwater maintenance. The Town's dedicated stormwater website <https://www.avon-ma.gov/stormwater-dpw> has a number of fact sheets available for download, including brochures related to septic system maintenance, dog waste clean-up, and other general stormwater information. The Town also distributed a fact sheet with dog license registrations/renewals.

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
- ☒ 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.

- ☐ 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:

Public Education and Outreach - the Town is a member of the Neponset River Watershed Association which distributed a number of public education messages throughout the year. Targeted messages addressed topics related to pet waste collection, yard maintenance, and other general stormwater maintenance. The Town's dedicated stormwater website <https://www.avon-ma.gov/stormwater-dpw> has a number of fact sheets available for download, including brochures related to dog waste clean-up, lawn and garden maintenance, and other general stormwater information. The Town also distributed a fact sheet with dog license registrations/renewals.

Street Sweeping - All roads were swept once during Permit Year 3, and select priority roads were also swept a second time.

Structural BMPs - The Town developed an inventory of its town-owned Stormwater BMPs during Permit Year 3. BMP pollutant removal has not yet been computed, and it is expected that this will be completed as part of a future Source Identification Report to be completed by Year 4.

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

Annual Requirements

*Public Education and Outreach**

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

** Public education messages can be combined with other public education requirements as applicable (see Appendix H and F for more information)*

Good Housekeeping and Pollution Prevention for Permittee Owned Operations

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

Potential structural BMPs

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

- ☐ The BMP information is attached to the email submission
- ☐ The BMP information can be found at the following website:

Optional: If you would like to describe progress made on any incomplete requirements listed above or provide any additional details, please use the box below:

Public Education and Outreach - the Town is a member of the Neponset River Watershed Association which distributed a number of public education messages throughout the year. Targeted messages addressed topics related to pet waste collection, yard maintenance, and other general stormwater maintenance. The Town's dedicated stormwater website <https://www.avon-ma.gov/stormwater-dpw> has a number of fact sheets available for download, including brochures related to dog waste clean-up, lawn and garden maintenance, and other general stormwater information. The Town also distributed a fact sheet with dog license registrations/renewals.

Street Sweeping - All roads were swept once during Permit Year 3, and select priority roads were also swept a second time.

Structural BMPs - The Town developed an inventory of its town-owned Stormwater BMPs during Permit Year 3. BMP pollutant removal has not yet been computed, and it is expected that this will be completed as part of a future Source Identification Report to be completed by Year 4.

Optional: Use the box below to provide any additional information you would like to share as part of your self-assessment:

The Town has completed substantial work since submitting its Year 2 annual report as follows:

Illicit Discharge Detection and Elimination (IDDE) Plan - The Town completed a comprehensive written IDDE Plan that in part includes a written program for MS4 infrastructure maintenance to reduce pollution, a written catchment investigation procedures, as well as other requirements as outlined in the permit. As part of plan preparation, outfall catchments were also delineated, classified, and ranked as per permit requirements.

Operation and Maintenance (O&M) Plan - The Town prepared an O&M Plan that in part included procedures for parks and open spaces, buildings and facilities, vehicles and equipment, and MS4 infrastructure. This Plan also included development of a Winter Road Maintenance Plan to address winter O&M procedures.

Street Sweeping Plan - The Town prepared a street sweeping plan to determine which town-owned roadways should be swept once or twice a year.

Catch Basin Cleaning Optimization Plan - The Town developed a preliminary Catch Basin Cleaning Optimization Plan with a goal of streamlining catch basin cleaning to help clean catch basins with a sufficient frequency that sumps are not more than 50% full. It is anticipated that the Town will work to obtain sufficient data over the next several years to finalize this plan.

Facility Inventory - As part of the O&M Plan, the town developed an inventory of town-owned facilities.

Trout Brook Watershed Study - The Town completed a comprehensive investigation of its stormwater infrastructure within the Trout Brook watershed, a water body impaired for bacteria. Trout Brook discharges to the Matfield River which is impaired for bacteria and total phosphorus, which then eventually discharges to Mount Hope Bay which is impaired for bacteria and total nitrogen. Avon considers Trout Brook to be its priority waterbody for improving water quality, in part because more than 65% of the Town's drinking water supply is drawn from the Trout Brook aquifer. As part of this study, the Town inspected 21 outfalls within the

watershed out of a total of 43 known outfalls for dry weather flows that could be indicative of an illicit discharge. Of the 21 outfalls, only 1 was flowing and did not meet EPA's requirements for an illicit discharge due to likely sewer input. 5 outfalls were also inspected during wet weather. Town has actively been pursuing grants such as a 604b and s.319 to fund design, permitting, and construction of drainage improvements. One project completed to date is a comprehensive rehabilitation of the Town Hall to include various public demonstration BMPs, including a gravel wetland, rain garden, tree box, swale, and drywells, etc. The Town is looking to install expanded signage to explain the function of various BMPs to interested members of the public.

Part III: Receiving Waters/Impaired Waters/TMDL

Have you made any changes to your lists of receiving waters, outfalls, or impairments since the NOI was submitted?

☒ Yes

☐ No

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

The Town has determined it is subject to the following additional TMDL and Impaired Waters requirements:

- Mount Hope Bay (MA61-06), bacteria water quality impairments requirements (Appendix H, Part III)
- Trout Brook (MA62-07), bacteria water quality impairments requirements (Appendix H, Part III)
- Trout Brook (MA62-07), turbidity/TSS water quality impairments have been removed

Part IV: Minimum Control Measures

Please fill out all of the metrics below. If applicable, include in the description who completed the task if completed by a third party.

MCM1: Public Education

Number of educational messages completed **during this reporting period:**

Below, report on the educational messages completed **during this reporting period**. For the measurable goal(s) please describe the method/measures used to assess the overall effectiveness of the educational program.

BMP: Neponset River Watershed Association

Message Description and Distribution Method:

The Neponset River Watershed Association provided a direct mailing to all residential and business addresses in Avon. The flyer consisted of a number of general stormwater-related public information topics, including pet waste, fertilizer application, and lawn care.

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

Message Date(s):

Message Completed for: Appendix F Requirements ☒ Appendix H Requirements ☒

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

If yes, describe why the change was made:

BMP: Stormwater Hotline

Message Description and Distribution Method:

The Neponset River Watershed Association has developed a stormwater hotline to allow residents within the watershed to call about stormwater-related items

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

Message Date(s): Ongoing / Continuous

Message Completed for: Appendix F Requirements ☐ Appendix H Requirements ☐

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

If yes, describe why the change was made:

The Town has opted to partner with the Neponset River Watershed Association to broaden its public education reach

BMP: Stormwater Website

Message Description and Distribution Method:

The Town's dedicated stormwater website <https://www.avon-ma.gov/stormwater-dpw> has a number of fact sheets available for download, including brochures related to septic system maintenance, dog waste clean-up, use of erosion controls during construction, lawn and garden maintenance, and other general stormwater information

Targeted Audience: Residents; Businesses, institutions and commercial facilities; Developers; Industrial

Responsible Department/Parties: Public Works, Board of Health

Measurable Goal(s):

Distribute a minimum of two (2) educational messages spaced at least a year apart by Permit Year 5 (June 30, 2023) as well as any that may be required by Appendices F and H

Message Date(s): Ongoing / Continuous

Message Completed for: Appendix F Requirements ☒ Appendix H Requirements ☒

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

If yes, describe why the change was made:

BMP: Pet Waste Brochure Distribution

Message Description and Distribution Method:

Distribute a fact sheet with dog license registrations/renewals.

Targeted Audience: Residents

Responsible Department/Parties: Town Clerk, Public Works

Measurable Goal(s):

Distribute fact sheets on dog waste cleanup with all dog license registrations and renewals

Message Date(s): Ongoing

Message Completed for: Appendix F Requirements ☒ Appendix H Requirements ☒

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

If yes, describe why the change was made:

To comply with TMDL and impaired waters requirements

Add an Educational Message

MCM2: Public Participation

Describe the opportunity provided for public involvement in the development of the Stormwater Management Program (SWMP) **during this reporting period:**

SWMP Plan for Download - The Town has made the SWMP Plan publicly available for public comment.

Was this opportunity different than what was proposed in your NOI? Yes ☐ No ☒

Describe any other public involvement or participation opportunities conducted **during this reporting period:**

The Town constructed multiple public demonstration stormwater treatment BMPs at the Town Hall, including a gravel wetland, rain garden, tree box, swale, and drywells, etc. The Town held several site walkthroughs with interested parties, however, walkthroughs have been discontinued in light of the COVID-19 outbreak. The Town is also looking to install expanded signage to explain the function of various BMPs to interested members of the public.

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:

MS4 System Mapping

Optional: Provide additional status information regarding your map:

The Town has completed a comprehensive mapping program over the past several years during which receiving waterbodies and impairments, outfalls, catch basins, manholes, stormwater BMPs, and pipe interconnectivity were mapped in GIS. Initial catchment delineations have also been completed based on topographic mapping and available stormwater system information. Completion of these items has put the the Town largely in compliance with the Phase II requirements which are not due until Year 10. Mapping of open channel conveyances and 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. Please also include the updated inventory and ranking of outfalls/interconnections based on monitoring results.

- ☐ No outfalls were inspected
- ☐ 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:

*Below, report on the percent of outfalls/interconnections screened **to date.***

Percent of outfalls screened:

Optional: Provide additional information regarding your outfall/interconnection screening:

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.

- ☒ No catchment investigations were conducted
- ☐ The catchment investigation data is attached to the email submission
- ☐ The catchment investigation data can be found at the following website:

*Below, report on the number of catchment investigations completed **during this reporting period.***

Number of catchment investigations completed this reporting period:

*Below, report on the percent of catchments investigated **to date**.*

Percent of total catchments investigated:

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

IDDE Progress

If illicit discharges were found, please submit a document describing work conducted over this reporting period, and cumulative to date, including location source; description of the discharge; method of discovery; date of discovery; and date of elimination, mitigation, or enforcement OR planned corrective measures and schedule of removal.

- ☒ No illicit discharges were found
- ☐ The illicit discharge removal report is attached to the email submission
- ☐ The illicit discharge removal report can be found at the following website:

*Below, report on the number of illicit discharges identified and removed, along with the volume of sewage removed **during this reporting period**.*

Number of illicit discharges identified:

Number of illicit discharges removed:

Estimated volume of sewage removed: gallons/day

*Below, report on the total number of illicit discharges identified and removed to date. At a minimum, report on the number of illicit discharges identified and removed **since the effective date of the permit (July 1, 2018)**.*

Total number of illicit discharges identified:

Total number of illicit discharges removed:

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

Employee Training

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

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

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: 0

Number of inspections completed: 0

Number of enforcement actions taken: 0

Optional: Enter any additional information relevant to construction site plan reviews, inspections, and enforcement actions:

MCM5: Post-Construction Stormwater Management in New Development and Redevelopment**As-built Drawings**

*Below, report on the number of as-built drawings received **during this reporting period**.*

Number of as-built drawings received: 0

Optional: Enter any additional information relevant to the submission of as-built drawings:

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 Permit Year 4.

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 Permit Year 4.

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 Permit Year 4.

MCM6: Good Housekeeping

Catch Basin Cleaning

*Below, report on the number of catch basins inspected and cleaned, along with the total volume of material removed from the catch basins **during this reporting period**.*

Number of catch basins inspected:

Number of catch basins cleaned:

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

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

Total number of catch basins:

If applicable:

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

Street Sweeping

*Report on street sweeping completed **during this reporting period** using one of the three metrics below.*

- ☐ Number of miles cleaned:
- ☐ Volume of material removed: [Select Units]
- ☒ Weight of material removed:

Stormwater Pollution Prevention Plan (SWPPP)

*Below, report on the number of site inspections for facilities that require a SWPPP completed **during this reporting period**.*

Number of site inspections completed:

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

A preliminary review indicates that the Town has one eligible facility, the DPW Garage, as well as potentially a second eligible facility associated with material stockpiling. The Town has hired a consultant to assist with this task, anticipated to occur during Permit Year 4, likely during fall 2021.

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:

As noted previously, the Town has completed substantial work since submitting its Year 2 annual report as follows:

Illicit Discharge Detection and Elimination (IDDE) Plan - The Town completed a comprehensive written

IDDE Plan that in part includes a written program for MS4 infrastructure maintenance to reduce pollution, a written catchment investigation procedures, as well as other requirements as outlined in the permit. As part of plan preparation, outfall catchments were also delineated, classified, and ranked as per permit requirements.

Operation and Maintenance (O&M) Plan - The Town prepared an O&M Plan that in part included procedures for parks and open spaces, buildings and facilities, vehicles and equipment, and MS4 infrastructure. This Plan also included development of a Winter Road Maintenance Plan to address winter O&M procedures.

Street Sweeping Plan - The Town prepared a street sweeping plan to determine which town-owned roadways should be swept once or twice a year.

Catch Basin Cleaning Optimization Plan - The Town developed a preliminary Catch Basin Cleaning Optimization Plan with a goal of streamlining catch basin cleaning to help clean catch basins with a sufficient frequency that sumps are not more than 50% full. It is anticipated that the Town will work to obtain sufficient data over the next several years to finalize this plan.

Facility Inventory - As part of the O&M Plan, the town developed an inventory of town-owned facilities.

COVID-19 Impacts

Optional: If any of the above year 3 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:

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 4 requirements summarized below. (Note: impaired waters and TMDL requirements are not listed below)

Yes, I agree ☒

- Develop a report assessing current street design and parking lot guidelines and other local requirements within the municipality that affect the creation of impervious cover
- Develop a report assessing existing local regulations to determine the feasibility of making green infrastructure practices allowable when appropriate site conditions exist
- Identify a minimum of 5 permittee-owned properties that could potentially be modified or retrofitted with BMPs to reduce impervious areas

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 curbed streets at least annually
- Continue investigations of catchments associated with Problem Outfalls
- Implemented SWPPPs for all permittee owned or operated maintenance garages, public works yards, transfer stations, and other waste handling facilities
- 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
- Review O&M programs for all permittee owned facilities; update if necessary
- Implement all maintenance procedures for permittee owned facilities in accordance with O&M programs
- Implement program for MS4 infrastructure maintenance to reduce the discharge of pollutants
- Enclose all road salt storage piles or facilities and implemented winter road maintenance procedures to minimize the use of road salt
- Review as-built drawings for new and redevelopment to ensure compliance with post construction bylaws, regulations, or regulatory mechanism consistent with permit requirements
- Inspect all permittee owned treatment structures (excluding catch basins)

Provide any additional details on activities planned for permit year 4 below:

Part V: Certification of Small MS4 Annual Report 2021

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:

William A. Fitzgerald Jr

Title:

DPW Director

Signature:



Date:

09/27/21

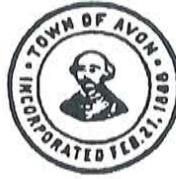
[Signatory may be a duly authorized representative]

BOARD OF SELECTMEN
Steven P. Rose, Chairman,
Eric S. Beckerman, Clerk
Robert F. Brady, Jr., Associate

Gregory S. Enos
TOWN ADMINISTRATOR

Town of Avon Massachusetts

Town Offices
Buckley Center 02322
(508) 588-0414
FAX (508) 559-0209



September 27, 2018

Ms. Thelma Murphy
U.S. Environmental Protection Agency
5 Post Office Square, Suite 100 (OEP06-1)
Boston, MA 02109-3912

Re: NPDES MA Small MS4 General Permit
Delegating an "Authorized Representative"

Dear Ms. Murphy:

This letter serves to designate the Town of Avon **DPW Director** as an authorized person for signing the Stormwater Management Plan (SWMP), stormwater pollution prevention plans (SWPPPs), inspection reports, annual reports, monitoring reports, reports on training and other information required under the General Permit. This authorization cannot be used for signing a NPDES permit application (e.g., Notice of Intent (NOI)) in accordance with 40 CFR 122.22.

By signing this authorization, I confirm that the Chairman of the Board of Selectman meets the following requirements to make such a designation as set forth in Appendix B, Subparagraph 11 of the Small MS4 General Permit:

For a municipality, state, federal, or other public agency: By either a principal executive officer or ranking elected official. For purposes of this subsection, a principal executive officer of a federal agency includes (i) the chief executive officer of the agency, or (ii) a senior executive officer having responsibility for the overall operations of a principal geographic unit of the agency (e.g., Regional Administrator of EPA).

"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 gathered and evaluated 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, 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."

Sincerely,

Steven P. Rose
Chairman, Avon Board of Selectman