

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:

EPA NPDES Permit Number:

Primary MS4 Program Manager Contact Information

Name:

Title:

Street Address Line 1:

Street Address Line 2:

City:

State:

Zip Code:

Email:

Phone Number:

Stormwater Management Program (SWMP) Information

SWMP Location (web address):

Date SWMP was Last Updated:

If the SWMP is not available on the web please provide the physical address:

Part II: Self-Assessment

First, in the box below, select the impairment(s) and/or TMDL(s) that are applicable to your MS4. Make sure you are referring to the most recent EPA approved Section 303(d) Impaired Waters List which can be found here: <https://www.epa.gov/tmdl/region-1-impaired-waters-and-303d-lists-state>

Impairment(s)

- ☐ 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 - Over the past 2 years, the Town attempted to inspect all 83 known stormwater outfalls within the urbanized area during dry weather to investigate for potential illicit discharges. Of the 83 known stormwater outfalls that were attempted to be inspected, 75 were located and 1 of which were flowing. The single flowing outfall was sampled and did not meet the permit criteria for being highly likely to contain illicit discharges from sanitary sources. The remaining 8 outfalls that could not be located or accessed were instead investigated at the immediate upgradient structure for potential illicit discharge indicators, of which none were observed. Note, numbers above represent all outfall screening completed to date. Numerous outfalls were revisited between Year 2 and Year 3 and thus it is difficult to quantify the number of outfalls screened in individual years.

Update Outfall Inventory and Priority Ranking - Outfall inventory and priority ranking was conducted concurrent with a comprehensive update of the SWMP and IDDE Plans, completed on July 31, 2021. The Town will continue to locate and inspect additional stormwater infrastructure during future permit years.

Illicit Discharge Control Bylaw - The Town established an “Illicit Discharge Control” bylaw under Article XXVIII of the Town’s general bylaws, (adopted May 15, 2021) which in part prohibits illicit discharges, provides provisions for investigating and eliminating illicit discharges, and implementing enforcement actions.

Construction and Post-Construction Bylaw - The Town also established a “Construction and Post-Construction Stormwater Management” bylaw under Article XXIX of the Town’s general bylaws, (adopted May 15, 2021) and accompanying “Stormwater Management Rules and Regulations” (adopted July 27, 2021) 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. Bylaws were adopted within this reporting period, however, regulations were adopted just outside of the reporting period but have been in development since as early as 2018.

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:

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:

Chloride

Annual Requirements

Public Education and Outreach

- ☐ Included an annual message in November/ December to private road salt applicators and commercial industrial site owners on the proper storage and application rates of winter deicing material, along with the steps that can be taken to minimize salt use and protect local waterbodies

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 Town only recently became aware of this requirement and has not yet gone through a winter cycle that allows for distribution. This requirement will be addressed during future years.

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 3.

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.

Charles River Watershed Phosphorus TMDL

- ☒ Completed the funding source assessment

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

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

☐ 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:

- Cambridge Reservoir, chloride impaired waters requirements. (Appendix H, Part IV)
- Cambridge Reservoir Upper Basin, chloride impaired waters requirements. (Appendix H, Part IV)
- Elm Brook, bacteria impaired waters requirements. (Appendix H, Part III)
- Hobbs Brook, chloride impaired waters requirements. (Appendix H, Part IV)
- Shawsheen River, bacteria impaired waters requirements. (Appendix H, Part III)
- Unnamed Tributary, chloride impaired waters requirements. (Appendix H, Part IV)

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: Video, ThinkBlue Massachusetts "Fowl Water"

Message Description and Distribution Method:

ThinkBlue Massachusetts "Fowl Water" video (<https://www.thinkbluemasachusetts.org/>) Advertisement on Facebook, Instagram, & YouTube.

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

Social media impressions for the town totaled 24,212 through the town's membership in 3 coalitions/committees.

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: Flyer, Be a Leaf Hero

Message Description and Distribution Method:

Distributed "Be a Leaf Hero" flyers during Fall 2020 season to educate residents about proper leaf disposal. Flyers were placed in the atrium of town hall, posted on the town's website, and published in the local paper.

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

Distribute flyers through multiple avenues. Flyers were placed in the atrium of town hall, posted on the town's website, and published in the local paper.

Message Date(s): Fall 2020

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

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

If yes, describe why the change was made:

BMP: Flyer, Do Your "Doody" for Clean Water

Message Description and Distribution Method:

Distributed a ThinkBlue fact sheet describing proper dog waste management with all dog license applications.

Targeted Audience: Residents

Responsible Department/Parties: Town Clerk

Measurable Goal(s):

Distribute fact sheets with all dog license registrations.

Message Date(s): Continuously

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 Signage

Message Description and Distribution Method:

Designed and printed three different outreach signs about picking up after your dogs and leashing them in sensitive areas.

Targeted Audience: Residents

Responsible Department/Parties: Conservation

Measurable Goal(s):

17 signs were posted June 2021 at 10 agricultural field entrances and major trailheads, particularly those trailheads leading to Lincoln's public water supply. It is estimated that 50-250 people are seeing the signs each day.

Message Date(s): June 2021 then Continuous / 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:

Determined that this will be another effective outreach tool

BMP: Direct Mailing to Todd Pond Abutters

Message Description and Distribution Method:

In May 2021, all Todd Pond abutters were sent an educational letter and brochure on ways to protect the water quality of ponds. The brochure included environmental tips about lawn care, picking up after your dog, and proper maintenance of septic systems.

Targeted Audience: Residents

Responsible Department/Parties: Conservation Commission

Measurable Goal(s):

Distribute flyer to all abutters to Todd Pond.

Message Date(s): May 2021

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: Handbook, "Ecological Design, Construction and Maintenance"

Message Description and Distribution Method:

Provide a handbook on "Ecological Design, Construction and Maintenance" to all developers and interested residents. The Handbook is also available online for download from the Town's Conservation Commission website.

Targeted Audience: Residents, Developers (construction)

Responsible Department/Parties: Conservation Commission, Information Technology

Measurable Goal(s):

Make handbook available with all permit applications, continuously available online, and at the Conservation Department.

Message Date(s): Continuous / 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:

BMP: Website, Stormwater GIS Mapping

Message Description and Distribution Method:

Provide a Town website with free access to GIS data layers that in part pertain to stormwater

Targeted Audience: Residents, Businesses, Institutions, Commercial Facilities, Developers (construction)

Responsible Department/Parties: Information Technology

Measurable Goal(s):

Continue to update data layers to allow public access to accurate, up-to-date content.

Message Date(s): Continuous / 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:

BMP: Website, Stormwater Information

Message Description and Distribution Method:

Develop a town stormwater website with a links to external sites such as EPA and MassDEP, as well as provide stormwater brochures for download. <https://www.lincolntown.org/1010/Stormwater-and-Climate-Resiliency>

Targeted Audience: Residents, Businesses, Institutions, Commercial Facilities, Developers (construction)

Responsible Department/Parties: Conservation Commission, Information Technology

Measurable Goal(s):

Create a website and complete periodic updates.

Message Date(s): Continuous / 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:

Add an Educational Message

MCM2: Public Participation

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

SWMP Plan for Download - The Town has posted the SWMP Plan and other relevant information on Town website along with contact information to allow 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:**

Held two “Conservation Coffees” with 30 residents in attendance – topics included land conservation, proper dog waste disposal and construction monitoring near wetlands.

MCM3: Illicit Discharge Detection and Elimination (IDDE)

Sanitary Sewer Overflows (SSOs)

Check off the box below if the statement is true.

☒ This SSO section is NOT applicable because we DO NOT have sanitary sewer

*Below, report on the number of SSOs identified in the MS4 system and removed **during this reporting period.***

Number of SSOs identified:

Number of SSOs removed:

MS4 System Mapping

Optional: Provide additional status information regarding your map:

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. 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:

Over the past 2 years, the Town attempted to inspect all 83 known stormwater outfalls within the urbanized area during dry weather to investigate for potential illicit discharges. Of the 83 known stormwater outfalls that were attempted to be inspected, 75 were located and 1 of which was flowing. The single flowing outfall was sampled and did not meet the permit criteria for being highly likely to contain illicit discharges. The remaining 8 outfalls that could not be located or accessed were instead investigated at the immediate upgradient structure for potential illicit discharge indicators, of which none were observed. Note, numbers above represent all outfall screening completed to date. Numerous outfalls were revisited between Year 2 and Year 3 and thus it is difficult to quantify the number of outfalls screened in individual years.

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: 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.

- ☒ 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: 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: 0

Total number of illicit discharges removed: 0

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**:

An on-site IDDE training session was held on June 6, 2021 with applicable DPW staff. This session also provided training on Stormwater Pollution Prevention Plan (SWPPP) implementation and inspections at the DPW Garage.

MCM4: Construction Site Stormwater Runoff Control

*Below, report on the construction site plan reviews, inspections, and enforcement actions completed **during this reporting period**.*

Number of site plan reviews completed:

Number of inspections completed:

Number of enforcement actions taken:

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

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:

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

Note that the town just recently passed a regulations requiring submittal of as-built drawings for projects that disturb one or more acre. It is anticipated that the number of as-built drawings submitted will increase during future years.

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: 618

Number of catch basins cleaned: 618

Total volume or mass of material removed from all catch basins: 77 tons

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

Total number of catch basins: 0

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:

Not applicable, no corrective actions have been taken to date.

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 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)

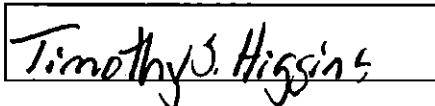
Provide any additional details on activities planned for permit year 4 below:

Part V: Certification of Small MS4 Annual Report 2021

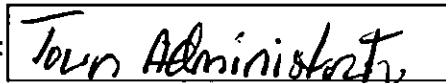
40 CFR 144.32(d) Certification

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.

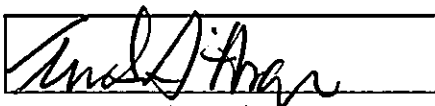
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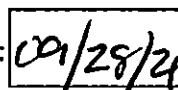
Title:



Signature:



Date:



[Signatory may be a duly authorized representative]