

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: City of Newton

EPA NPDES Permit Number: MAR041080

Primary MS4 Program Manager Contact Information

Name: Maria Rose

Title: Environmental Engineer

Street Address Line 1: 1000 Commonwealth Ave

Street Address Line 2: NA

City: Newton Centre

State: MA

Zip Code: 02459

Email: mrose@newtonma.gov

Phone Number: (617) 796-1661

Stormwater Management Program (SWMP) Information

SWMP Location (web address): <https://www.newtonma.gov/government/public-works/water-sewer-division/stormwater-resources>

Date SWMP was Last Updated: Aug 10, 2020

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:

Extensive time was spent developing a comprehensive new stormwater management ordinance and comprehensive supporting regulations. Collaboration amongst multiple City departments and legal reviews to ensure an effective product have taken longer than expected. The draft stormwater ordinance is ready to be docketed and will soon be reviewed and voted on by our City Council.

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:

We sweep our public roads four to five times per year and supplement with daily, weekday sweeps in the village centers. Implementation of maintenance procedures for stormwater facilities managed by the Dept. of Public Works was accomplished this reporting period. We are working with our School and Public Buildings Departments to obtain O&M plans and develop a maintenance schedule and budget for other City-owned facilities.

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:

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:

The attached structural BMP spreadsheet along with dozens of additional site plans and stormwater reports (retrieved from our records) has been submitted to our consultant to use as a baseline assessment for phosphorus removal. We engaged the services of a consultant to develop a preliminary Phase 1 Phosphorus Control Plan (PCP) and to assist us with interim goals related to the PCP permit requirements under the MS4 Permit.

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:

Since August of 2019 we have been documenting catch basin cleaning in PeopleGIS, which was a significant change and upgrade from our former paper tracking by street. As we collect and assess this data, we will soon be able to determine the location and frequency of catch basins with sumps more than 50% full for 2 consecutive cleaning events. Note: due to the number of catch basins in our City, it will take several years to reach every catch basin twice under the new tracking system (we clean roughly half of our CBs each year).

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:

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:

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: Proper Pet Waste Disposal (SWMP 1-13)

Message Description and Distribution Method:

"Do Your Doody. Scoop my poop." pet waste message sent out via social media.

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

@NewtonDPW has 867 followers. Pet waste bags in our catch basins have significantly reduced over the last few years.

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: Septic System maintenance (SWMP 1-11)

Message Description and Distribution Method:

Twitter message for septic system maintenance. Do your part to be Septic Smart during EPA's Septic Smart week.

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

@NewtonDPW has 867 followers. We have a low percentage of properties on private septic systems and the number continues to decrease as more properties connect to City sewer.

Message Date(s): 9/15/20 and 9/16/20

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: Fall Leaf collection and flood prevention (SWMP 1-14)

Message Description and Distribution Method:

A message on the importance of raking, bagging and/or composting leaves for nutrient reduction / water quality and flood mitigation was published in Newton's Green Cart fall 2020 newsletter.

Targeted Audience: Residents

Responsible Department/Parties: DPW Operations

Measurable Goal(s):

Newton's Green Cart Chronicle is received by 4,658 contacts. Distribution is via email.

Message Date(s): 11/01/20

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: Winter Deicers - reduce salt usage (SWMP 1-2)

Message Description and Distribution Method:

Information from the ThinkBlueMA campaign on reducing and using de-icers in moderation was posted on the City's stormwater web page during the winter.

Targeted Audience: Businesses, institutions and commercial facilities

Responsible Department/Parties: DPW Operations

Measurable Goal(s):

Responsible use of deicers was noted in the chloride impacted watershed (Saw Mill brook).

Message Date(s): December 2020 through March 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: Proper pet waste disposal message (SWMP 1-13)

Message Description and Distribution Method:

Working with the City Clerk's office, information was posted on Dog Licensing web page. The message headline is: Properly Dispose of Pet Waste - it's the Law! A link with a map to pet waste stations was included. A flier is also available for walk-in registration.

Targeted Audience: Residents

Responsible Department/Parties: MS4 Program Manager and City Clerk's Office

Measurable Goal(s):

Over 5,000 dog licenses are issued annually. The owners are made aware of the pet waste disposal law at the time of licensing.

Message Date(s): February 2021 to present

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: School Visits

Message Description and Distribution Method:

Upon request by Newton teachers, we bring our EnviroScape watershed model and give a presentation on watersheds, pollution prevention or stormwater depending on the teacher's curriculum needs and grade level. Due to COVID-19, we reformatted our presentation to be virtual and maintained interactive participation through small incentives.

Targeted Audience: Residents (students)

Responsible Department/Parties: MS4 Program Manager

Measurable Goal(s):

Presentations are given upon request. A virtual presentation was made to the 5th grade classes at the Jackson School this reporting period.

Message Date(s): 2/5/21

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:

This is an extra BMP (not proposed in our NOI) we wish to include in our Annual Report.

BMP: Lawn and Garden Tips to Help Curb Stormwater Pollution (SWMP 1-12)

Message Description and Distribution Method:

Info-graphic flier from ThinkBlue Massachusetts with ten tips on lawn care with link on how to get soil tested prior to applying fertilizer.

Targeted Audience: Residents

Responsible Department/Parties: DPW Operations

Measurable Goal(s):

Information posted on May 5, 2020 via social media. @NewtonDPW has 867 followers.

Message Date(s): 5/5/20

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:

For implementation ease during the pandemic, information was posted on social media instead of in the local newspaper. Since a spring lawn care message is required each year, we will use a different media outlet next year.

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:**

A bill insert was included in fall cycle of water / sewer / stormwater bills. The insert briefly explained our MS4 Permit and Stormwater Management Program with a link to the plan. It also included an explanation of stormwater runoff and how who to contact if there were any comments or questions about the SWMP Plan.

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:**

Our Household Hazardous Waste (HHW) Collection program schedule was disrupted during most of the COVID-19 pandemic shut down. The regular schedule resumed in the spring. During this reporting period: 705 cars dropped off HHW material over the course of 10 collection days.

Newton has a 311 system and dedicated customer service division. We receive reports of illegal dumping into our storm drains through direct phone calls, emails and the 311 system. This year we received 5 reports of illegal dumping (one was a power washing incident that activated a MaDEP response). Follow-up response actions and letters to the offenders were completed for these incidents.

We hosted a community rain barrel sale on June 22, 2021.

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:

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:

<https://www.newtonma.gov/government/public-works/water-sewer-division/stormwater-resources> with the MS4 Annual Reports

*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:

Both dry weather and wet screening occurred at outfalls / interconnections during this reporting period.

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:

<https://www.newtonma.gov/government/public-works/water-sewer-division/stormwater-resources>

*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:

We continue to implement our IDDE Plan. Our stormwater consultant and contractor have conducted field work (manhole inspections, sand bagging and field screening) with support from our Utilities Division. This year investigations proceeded in the Laundry Brook watershed (77), Hyde Brook watershed (81) and smaller catchment areas: 32 and 90. Due to the COVID-19 pandemic, we could not enter houses or buildings to inspect plumbing, therefore we are not counting any of these catchment investigations as "complete" until the building inspections and dye testing are conducted.

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:

The illicit discharges noted above are cumulative from this permit term and the prior 2003 MS4 permit term. A master summary of illicit discharges found and removed is attached.

Employee Training

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

Key staff listened to a prerecorded IDDE training on June 2, 2021.

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:

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:

Newton has developed Complete Streets Policy and a Street Design Guide. Low impact development and disconnecting impervious areas are encouraged, as part of a balanced approach for addressing multiple needs. These documents can be viewed here:
<https://www.newtonma.gov/government/planning/transportation-planning/transportation-plans>

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:

Our proposed stormwater management ordinance requires infiltration practices and low impact development techniques. We will work with our Planning and Inspectional Services Departments as we prepare the Green Infrastructure report this year.

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:

Several public schools have been re-built or retrofitted in the last few years, including Zervas, Angier, Cabot, and Franklin elementary schools. Stormwater best management practices have been installed at each of these locations.

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:

☒ 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:

Parking lot / DPW yard sweeping is often needed after a SWPPP inspection, particularly in the spring. Several catch basins needed to be cleaned, as well.

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):

<https://www.newtonma.gov/government/public-works/water-sewer-division/stormwater-resources>

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:

As noted in our previous annual report, a comprehensive study to determine internal and external (watershed) nutrient loads to Crystal lake was completed and a management plan developed. The strategies implemented in the lake watershed will provide insights for City-wide phosphorus control planning. Implementation of the Crystal Lake Management Plan is underway. The plan and 2020 monitoring report are provided on City's stormwater web page.

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:

As noted in the IDDE section of this report, we could not enter houses or buildings to inspect plumbing or conduct dye testing due to the COVID-19 pandemic. IDDE work continued as much as practicable during this time and included manhole inspections and field work within the right of way. Our consultant has recently resumed building inspections; and this important step in finding illicit discharges and connections has resumed on a small scale.

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:

James McGonagle

Title:

Commissioner, Public Works Dept.

Signature:

James

McGonagle

Digitally signed by James
McGonagle
Date: 2021.09.28 11:04:35 -04'00'

Date:

*[Signatory may be a duly authorized
representative]*