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 Organ	ization: Tov	wn of Soutl	ı Hadley			
EPA N	IPDES Permit Number:	1AR041020					
Prima	ry MS4 Program Manag	ger Contac	t Informat	ion			
Name:	Melissa LaBonte			Title:	Superintendent	, Div. of WPC	
Street .	Address Line 1: 2 James 5	Street					
Street	Address Line 2: na						
City:	Chicopee	S	tate: MA	Zip Co	de: 01020		
Email: mlabonte@southhadleyma.gov			Phon	e Number: (413	5) 538-5040		
Storm	water Management Prog	gram (SWN	MP) Inform	nation			
SWMF	Location (web address):	https://ww	w.southhac	lley.org/	995/Stormwater	-compliance	
Date S	WMP was Last Updated:	9/28/2020					
If the S	SWMP is not available on	the web plo	ease provid	e the phy	ysical address:		

Part II: Self-Assessment

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

Impairment	(s)			
	⊠ Bacteria/Pathogens	☐ Chloride	☐ Nitrogen	☐ Phosphorus
	Solids/ Oil/ Grease (Hy	/drocarbons)/ Meta	ls	
TMDL(s)				
In State:	☐ Assabet River Phospho ☐ Charles River Watersho		eria and Pathogen Lake and Pond	Cape Cod Nitrogen Phosphorus
Out of State:	☐ Bacteria/Pathogens	☐ Metals		☐ Phosphorus
	,		Cl	ear Impairments and TMDLs
<u></u>			- Contraction of the Contraction	
you have con	ff all requirements below the spleted that permit requirent dditional information will be	nent fully. If you ha	we not completed a re	ch box you are certifying that equirement leave the box
Year 3 Requi	rements			
☐ Inspec	ted and screened all outfalls.	/interconnections (e	excluding Problem and	d Excluded outfalls)
	ed outfall/interconnection pr er inspections as necessary	iority ranking based	d on the information c	ollected during the dry
Post-co		e, or other regulator	ry mechanism was upo	dated and adopted consistent
any additional impacts of Co	you would like to describe particle information, and/or if any OVID-19, please identify the mplete the requirement, and	of the above year 3 e requirement that of	requirements could not be completed	ot be completed due to the d, any actions taken to
	y weather inspections of 10			A CONTRACTOR OF THE PROPERTY O
The remainin when that is o	g outfalls are scheduled for complete.	inspection this Fall	, and the outfall priori	ty rankings will be updated
	struction bylaw has been up oproved at the next Town M			rd, however the Bylaw still
Annual Requi				
	ed an opportunity for public ate Public Notice requireme		iew and implementati	on of SWMP and complied

Provided information to owners of septic systems about proper maintenance in any catchment that

renewal of dog license, or other appropriate time

discharges to a water body impaired for bacteria

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

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

The Connecticut River Stormwater Committee provided messaging on each of these within the region and is reporting on these activities under Part IV - MCM 1 of the annual report.

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)
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.
C The BMP information is attached to the email submissionC 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:
No increase in street sweeping due to staffing shortages, and high rainfall this summer. Minimal sand and salt usage due to a mild winter.
The Connecticut River Stormwater Committee provided messaging on each of these within the region and is

reporting on these activities under Part IV - MCM 1 of the annual report.

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:
Optional: Use the box below to provide any additional information you would like to share as part of your self-assessment:
The Town of South Hadley participated in a group project through PVPC and NepRWA for Nitrogen Source Identification reporting, funded by a MassDEP Municipal Assistance Program Grant. This report, required under Appendix F, is due in year 4. The deliverable was a draft report for the Town to build on going forward.

Part III: Receiving Waters/Impaired Waters/TMDL

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

YesNo

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

Based on Massachusetts 2016 Impaired Waters listing, Bachelor Brook has been added for E. coli, while the TSS impairment for the Connecticut River has been removed.

Determined that the Lake & Pond TMDL did not apply to South Hadley. Confirmed with EPA.

Adjusted the number of outfalls discharging to various waterbodies per initial outfall inspections.

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: 0 Below, report on the educational messages completed during this reporting period. For the measurable goal(s) please describe the method/measures used to assess the overall effectiveness of the educational program. BMP: #1. Think Blue Connecticut River Website Message Description and Distribution Method: See: https://thinkblueconnecticutriver.org/wp-content/uploads/2021/09/CT-River-SWC-Annual-Report-Narrative-MCM-1-Year-3.pdf Targeted Audience: Residents, business/institutional/commercial, developers, and industrial Responsible Department/Parties: Connecticut River Stormwater Committee Measurable Goal(s): Message Date(s): Appendix F Requirements Appendix H Requirements Message Completed for: Was this message different than what was proposed in your NOI? Yes C No C If yes, describe why the change was made: **BMP: #2. Cigarette butts** Message Description and Distribution Method: See: https://thinkblueconnecticutriver.org/wp-content/uploads/2021/09/CT-River-SWC-Annual-Report-Narrative-MCM-1-Year-3.pdf Targeted Audience: Residents

Town of South Hadley	Page 8
Responsible Department/Parties: Connecticut River Stormwater Committee	
Measurable Goal(s):	
·	
Message Date(s):	
Message Completed for: Appendix F Requirements ☐ Appendix H Requirements ☐	
Was this message different than what was proposed in your NOI? Yes C No C	
If yes, describe why the change was made:	
BMP: #3. Dumpster waste and avoiding contaminated flows	
Message Description and Distribution Method:	
See: https://thinkblueconnecticutriver.org/wp-content/uploads/2021/09/CT-River-SWC-Annual-Reponentative-MCM-1-Year-3.pdf	ort-

	ACCOUNT A SEASON
Targeted Audience: Businesses, institutions, and commercial facilities	
Responsible Department/Parties: Connecticut River Stormwater Committee	
Measurable Goal(s):	
Message Date(s):	
Message Completed for: Appendix F Requirements ☐ Appendix H Requirements ☐	
Was this message different than what was proposed in your NOI? Yes C No C If yes, describe why the change was made:	
11 yes, describe why the change was made.	

BMP: #4. New MS4 development standards and erosion and sediment control

Message Description and Distribution Method:
See: https://thinkblueconnecticutriver.org/wp-content/uploads/2021/09/CT-River-SWC-Annual-Report-
Narrative-MCM-1-Year-3.pdf
Targeted Audience: Developers
Responsible Department/Parties: Connecticut River Stormwater Committee
Measurable Goal(s):
Message Date(s):
iviessage Date(s).
Message Completed for: Appendix F Requirements ☐ Appendix H Requirements ☐
Was this message different than what was proposed in your NOI? Yes C No C
If yes, describe why the change was made:
BMP: #5. Fleet maintenance to avoid spills and leaks
Message Description and Distribution Method:
See: https://thinkblueconnecticutriver.org/wp-content/uploads/2021/09/CT-River-SWC-Annual-Report-Narrative-MCM-1-Year-3.pdf
Namative-MCM-1-1 Car-3.pu
Targeted Audience: Industrial facilities
Responsible Department/Parties: Connecticut River Stormwater Committee
Measurable Goal(s):

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Message Date(s):	
Message Completed for: Appendix F Requirements Appendix H Requirements	
Was this message different than what was proposed in your NOI? Yes C No C If yes, describe why the change was made:	
BMP: #6. Proper disposal of leaf litter	
Message Description and Distribution Method: See: https://thinkblueconnecticutriver.org/wp-content/uploads/2021/09/CT-River-SWC-Annual-Report Narrative-MCM-1-Year-3.pdf	t-
Targeted Audience: Residents	
Responsible Department/Parties: Connecticut River Stormwater Committee	
Measurable Goal(s):	
Message Date(s):	
Message Completed for: Appendix F Requirements ☐ Appendix H Requirements ☐	
Was this message different than what was proposed in your NOI? Yes C No C	
If yes, describe why the change was made:	
BMP: #7. Importance of soil test, proper use of fertilizers, disposal of grass clippings	
Message Description and Distribution Method:	
See: Add new url to access annual report See: https://thinkblueconnecticutriver.org/wp-content/uploads/2021/09/CT-River-SWC-Annual-Report-Narrative-MCM-1-Year-3.pdf	

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Targeted Audience: Residents	
Responsible Department/Parties: Connecticut River Stormwater Committee	
Measurable Goal(s):	
Message Date(s):	
Message Completed for: Appendix F Requirements Appendix H Requirements	
Was this message different than what was proposed in your NOI? Yes C No C	
If yes, describe why the change was made:	to on an in an analysis of the field that the order to the field and the
See: https://thinkblueconnecticutriver.org/wp-content/uploads/2021/09/CT-River-SWC-An Narrative-MCM-1-Year-3.pdf	nual-Report-
Targeted Audience: Residents	
Responsible Department/Parties: Connecticut River Stormwater Committee Measurable Goal(s):	
Message Date(s):	
Message Completed for: Appendix F Requirements Appendix H Requirements	
Was this message different than what was proposed in your NOI? Yes \(\cap \) No \(\cap \) If yes, describe why the change was made:	
	<u> </u>

professional and the contract of the contract	n and Distribution Method:
See: https://thinkblu Narrative-MCM-1-Y	econnecticutriver.org/wp-content/uploads/2021/09/CT-River-SWC-Annual-Report- Tear-3.pdf
Targeted Audience:	Residents
Responsible Departr	nent/Parties: Connecticut River Stormwater Committee
Measurable Goal(s):	
Message Date(s):	
Wichhard Daicing.	
- Industry	for: Appendix F Requirements Appendix H Requirements
Message Completed Was this message dif	for: Appendix F Requirements Appendix H Requirements Ferent than what was proposed in your NOI? Yes No the change was made:
Message Completed Was this message dif If yes, describe why BMP: #10. Proper	ferent than what was proposed in your NOI? Yes C No C the change was made: disposal of leaf litter
Message Completed Was this message dif If yes, describe why BMP: #10. Proper of Message Description See: https://thinkblue	ferent than what was proposed in your NOI? Yes C No C the change was made: disposal of leaf litter and Distribution Method: econnecticutriver.org/wp-content/uploads/2021/09/CT-River-SWC-Annual-Report-
Message Completed Was this message dif If yes, describe why BMP: #10. Proper of Message Description See: https://thinkblue Narrative-MCM-1-Y	ferent than what was proposed in your NOI? Yes C No C the change was made: disposal of leaf litter and Distribution Method: econnecticutriver.org/wp-content/uploads/2021/09/CT-River-SWC-Annual-Report-

Town of South Hadley Page 13
Message Date(s):
Message Completed for: Appendix F Requirements ☐ Appendix H Requirements ☐
Was this message different than what was proposed in your NOI? Yes C No C
If yes, describe why the change was made:
BMP: #11. Importance of soil test, proper use of fertilizers, disposal of grass clippings
Message Description and Distribution Method:
See: https://thinkblueconnecticutriver.org/wp-content/uploads/2021/09/CT-River-SWC-Annual-Report-Narrative-MCM-1-Year-3.pdf
Targeted Audience: Business/institutions/commercial facilities
Responsible Department/Parties: Connecticut River Stormwater Committee
Measurable Goal(s):
Message Date(s):
Message Completed for: Appendix F Requirements Appendix H Requirements
Was this message different than what was proposed in your NOI? Yes C No C
If yes, describe why the change was made:
BMP: #12. Proper management of pet waste - businesses
Message Description and Distribution Method:
See: https://thinkblueconnecticutriver.org/wp-content/uploads/2021/09/CT-River-SWC-Annual-Report-Narrative-MCM-1-Year-3.pdf

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Targeted Audience: Businesses/institutions/commercial facilities	
Responsible Department/Parties: Connecticut River Stormwater Committee	
Measurable Goal(s):	
Message Date(s):	
Message Completed for: Appendix F Requirements ☐ Appendix H Requirements ☐	
Was this message different than what was proposed in your NOI? Yes C No C	
If yes, describe why the change was made:	
See: https://thinkblueconnecticutriver.org/wp-content/uploads/2021/09/CT-River-SWC-Annual-FN Narrative-MCM-1-Year-3.pdf	₹eport-
Targeted Audience: Residents and businesses/institutions/commercial facilities	
Responsible Department/Parties: Think Blue Massachusetts and Water Words that Work	
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 C No C	
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 :
Although we did not actively pursue public comment (BMP #2), the SWMP and email addresses for relevant Town personnel remained posted throughout the year (BMP #1).
Was this opportunity different than what was proposed in your NOI? Yes • No C
Describe any other public involvement or participation opportunities conducted during this reporting period : The revisions to the Stormwater Bylaw were presented to the Planning Board during a public meeting on May 10, 2021. It was originally also expected to be presented to Town Meeting for approval during the reporting year, but that meeting was limited to budget items only. It should be on the agenda for the next Town Meeting.
MCM3: Illicit Discharge Detection and Elimination (IDDE)
Sanitary Sewer Overflows (SSOs)
Check off the box below if the statement is true. This SSO section is NOT applicable because we DO NOT have sanitary sewer
Below, report on the number of SSOs identified in the MS4 system and removed during this reporting period. Number of SSOs identified: 0 Number of SSOs removed: 0
MS4 System Mapping
Optional: Provide additional status information regarding your map: Mapping of outfalls was completed, and catchment delineations were added.

Screening of Outfalls/Interconnections

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If conducted, please submit any outfall monitoring results from this reporting period. Outfall monitoring

sampling, pr	Id include the date, outfall/interconnection identifier, location, weather conditions at time of recipitation in previous 48 hours, field screening parameter results, and results from all analyses.
	include the updated inventory and ranking of outfalls/interconnections based on monitoring results. No outfalls were inspected
	C The outfall screening data is attached to the email submission
	• The outfall screening data can be found at the following website:
	https://tinyurl.com/ms4-public-viewer-southhadley
Below, repo	rt on the number of outfalls/interconnections screened during this reporting period.
	Number of outfalls screened: 100
Below, repo	rt on the percent of outfalls/interconnections screened to date.
	Percent of outfalls screened: 55
Optional: P	rovide additional information regarding your outfall/interconnection screening:
Will comple	ete dry weather inspections this Fall.
Catchment	Investigations
-	, please submit all data collected during this reporting period as part of the dry and wet weather
_	s. 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
	C The catchment investigation data can be found at the following website:
Below, repor	rt on the number of catchment investigations completed during this reporting period.
	Number of catchment investigations completed this reporting period: 0
Below, repor	t on the percent of catchments investigated to date.
	Percent of total catchments investigated: 0
Optional: Pr	rovide 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	
	C The illicit discharge removal report is attached	
	C The illicit discharge removal report can be foun	d at the following website:
•	ort on the number of illicit discharges identified and uring this reporting period.	removed, along with the volume of sewage
	Number of illicit discharges identified: 0	(100 to
	Number of illicit discharges removed: 0	
	Estimated volume of sewage removed: 0	gallons/day
	ort on the total number of illicit discharges identified of illicit discharges identified and removed since th	*
	Total number of illicit discharges identified: 0	
	Total number of illicit discharges removed: 0	
Employee 'Describe th	Training ne frequency and type of employee training conducte	d during this reporting period:
Below, repo his reporti	MCM4: Construction Site Storms or ton the construction site plan reviews, inspections, and period.	
	Number of site plan reviews completed: 0	
	Number of inspections completed: 0	
	Number of enforcement actions taken: 0	

<i>Optional:</i> 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:
Assessment completed by Scott Turner of Environmental Partners. The report, with recommendations, is included with this submittal.
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:
Assessment completed by Scott Turner of Environmental Partners. The report, with recommendations, is included with this submittal.

Retrofit Properties Inventory

Describe the status of the inventory, due in y be modified or retrofitted with BMPs to miti modified or retrofitted:			
			anni anni anni anni anni anni anni anni
NACINA	K. Cood II	Januarin a	
IVICIV	ю: Good п	lousekeeping	
Catch Basin Cleaning Below, report on the number of catch basins removed from the catch basins during this re			volume of material
Number of catch basins inspe	cted: 28		
Number of catch basins clean	ed: 28		
Total volume or mass of mate	rial removed	from all catch basins: 90	tons
Below, report on the total number of catch ba	sins in the M	IS4 system.	
Total number of catch basins:	1,216		
If applicable:			
Report on the actions taken if a catch basin so inspections/cleaning events:	ump is more	than 50% full during two cons	secutive routine
Street Sweeping			
Report on street sweeping completed during t	his reporting	period using <u>one</u> of the three	metrics below.
C Number of miles cleaned:			
C Volume of material removed:		[Select Units]	
• Weight of material removed:	167.31	tons	
Stormwater Pollution Prevention Plan (SW Below, report on the number of site inspection reporting period.		rs that require a SWPPP comp	oleted during this
Number of site inspections con	mpleted: 0		

Town of South Hadley	Page 20
Describe any corrective actions taken at a facility with a SW	PPP:
	.•
Additional Info	mation
Monitoring or Study Results Results from any other stormwater or receiving water quality reporting period not otherwise mentioned above, where the appearant effectiveness must be attached.	*
Not applicable	
C The results from additional reports or studies	are attached to the email submission
C The results from additional reports or studies	can be found at the following website(s):
If such monitoring or studies were conducted on your behalf entities were reported to you, a brief description of the type of described below:	
Additional Information	
Optional: Enter any additional information relevant to your s during the reporting period. Include any BMP modifications	
Three DDW personnel Participated in a 7 day course in March	h on Graan Infrastructura Training and will be

Three DPW personnel Participated in a 7 day course in March on Green Infrastructure Training and will be taking the exam for national certification.

The Town has been converting all trucks to ground speed control for salt application. The last vehicle will be done before the snow season begins. In addition, the Town is no longer using sand, just 100% sodium chloride, and magnesium chloride only if necessary.

The Town finished construction this year on a new Council on Aging facility. This included rain gardens and an infiltrator system.

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:

The South Hadley DPW has continued to face staffing shortages throughout its divisions, in conjunction with ongoing Covid-19 impacts on DPW operations and staffing. This has resulted in delays in implementing or completing some requirements, such as SWPPP's, however the Town does continue to make progress on Permit requirements.

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 SWPPs 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

representative]

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:	CHRIstophen J Bouchaso	Title:	Direction of Public Works
Signature:	Signatory may be a duly authorized	Date:	69-23-2421