

# Year 7 Annual Report

## Massachusetts Small MS4 General Permit

### Reporting Period: July 1, 2024-June 30, 2025

**\*\*Please DO NOT attach any documents to this form. Instead, attach all requested documents to an email when submitting the form. Also ensure any websites included on this form are to publicly accessible sites\*\***

*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, 2024 and June 30, 2025 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 (publicly available 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>

<b>Impairment(s)</b>			
<input checked="" type="checkbox"/> Bacteria/Pathogens	<input type="checkbox"/> Chloride	<input type="checkbox"/> Nitrogen	<input checked="" type="checkbox"/> Phosphorus
<input type="checkbox"/> Solids/ Oil/ Grease (Hydrocarbons)/ Metals			
<b>TMDL(s)</b>			
<i>In State:</i>	<input checked="" type="checkbox"/> Assabet River Phosphorus	<input type="checkbox"/> Bacteria and Pathogen	<input type="checkbox"/> Cape Cod Nitrogen
	<input type="checkbox"/> Charles River Watershed Phosphorus	<input type="checkbox"/> Lake and Pond Phosphorus	
<i>Out of State:</i>	<input type="checkbox"/> Bacteria/Pathogens	<input type="checkbox"/> Metals	<input type="checkbox"/> Nitrogen
			<input type="checkbox"/> 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 7 Requirements

- ☒ Completed catchment investigations associated with Problem Outfalls
- ☒ Completed catchment investigations where information gathered on the outfall/interconnection indicated sewer input

### 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 publicly available website:

<https://concordma.gov/3143/SSO-Public-Notification>

- ☒ Updated system map due in year 10 with information from completed catchment investigations
- ☒ Provided training to employees involved in IDDE program within the reporting period
- ☒ Properly stored and disposed of catch basin cleanings and street sweepings so they did not discharge to receiving waters

- ☒ All curbed roadways were swept at least once within the reporting period
- ☒ 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 or provide any additional details, please use the box below:

Regular inspections of the BMPs have been ongoing through highway and grounds department. Not all treatment structures were inspected, because of the lack of the staff and availability of the cleaning equipment.

### **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
- ☐ This is not applicable because there are no septic systems present

*\* Public education messages can be combined with other public education requirements as applicable (see Appendix F and H 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:

### **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)

*Structural BMPs*

- ☐ Installed a structural BMP as a demonstration project within the drainage area of the water quality limited water or its tributaries. The type of BMP installed is (*e.g. biofiltration*):

- ☒ 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.

- ☐ No BMPs were installed
- ☐ The above referenced BMP information is attached to the email submission
- ☒ The above referenced BMP information can be found at the following publicly available website:

chrome-extension://efaidnbmnnnibpcajpcgglefindmkaj/https://concordma.gov/DocumentCenter/View/44523/Concord-Phosphorus-Source-Identification-and-Potential-Structural-BMP-Report\_Draft

Total estimated phosphorus removed in **lbs/year** from the installed BMPs: 0.96

*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:

Town is working on identifying and analyzing all of the BMPs within the impairment areas.

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

Street Sweeping: Weekly sweeping is performed in the business districts, which includes Concord Center, Thoreau Depot and West Concord. 108 miles of road is swept twice a year in fall and spring.

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### 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 identified multiple structures that are not MS4 outfalls in the process of inspecting and screening outfalls in Permit year 3. The outfall inventory was updated and documented in the outfall/intersection priority ranking. Additionally, the list of impairments to receiving waters was updated based on the most recent version of the Integrated List of Waters. These changes are reflected in the updated SWMP, resubmitted July 30, 2021.

In year 4, the town visited fourteen of previously identified interconnections. During the field observations, the Town determined that these locations are not interconnections, they do not require sampling, and they will be removed from the outfall/interconnection priority ranking. Additionally, the list of impairments to receiving waters was updated based on the most recent version of the integrated list of Waters, which is the 2018/2020 integrated list of waters approved by EPA on February 2, 2022.

## 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:Stormwater Outreach (Septic System Maintenance) on Town Website**

Message Description and Distribution Method:

Stormwater outreach information covering lawn care, pet waste, septic tanks, non-point pollution source and stormwater runoff and more posted to Concord's website. The septic system information is included in the following flyers that are linked from the Health Department Webpages:

- "Septic Betterment Loan Program"
- "Buying or Selling Property with a septic System"
- "Title 5 Building Review"
- EPA - Septic System Information
- EPA - How to care for Your Septic System

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

Message Date(s):

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

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

If yes, describe why the change was made:

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#### **BMP:Spring Messaging**

Message Description and Distribution Method:

Brochure posted on the Town's Stormwater Website:

"Don't Trash the Grass"

"What's the problem with Fertilizer"

Targeted Audience:

Responsible Department/Parties: CPW

Measurable Goal(s):

Deliver annual messaging on applicable items in permit Appendix H and F.

Message Date(s): Ongoing

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

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

If yes, describe why the change was made:

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**BMP:Fall Messaging**

Message Description and Distribution Method:

Messaging on town's website for proper disposal of leaf litter - "Lawn Care (Leaf Litter and Grass Clippings" brochure.

Targeted Audience: Residents

Responsible Department/Parties: Engineering

Measurable Goal(s):

Deliver annual messaging on applicable items in permit Appendix H and F.

Message Date(s): Ongoing

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

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

If yes, describe why the change was made:

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**BMP:Stormwater Outreach on Town Website**

Message Description and Distribution Method:

Public outreach material on the following subjects continually available at <https://www.concordma.gov/2476/Public-Outreach-Information>

- Lawn Care (Leaf, Litter and Grass Clippings)
- Don't Trash the Grass
- Pet Waste
- Septic Tanks



- Signs You Should Clean Your Septic Tank
- Pet Waste - Civic Duty
- Creating a Healthy Yard
- Protect Your Pond
- What's the Problem with Fertilizers?
- Going Green - Raingardens
- Rake it or Leave it!

Stormwater information for local businesses:

- Stormwater Tips for Business Community
- What is Stormwater & Why does it Matter

Targeted Audience: Residents

Responsible Department/Parties: CPW

Measurable Goal(s):

Town stormwater website is operational and continually updated based on questions and concerns that arise, with sections directed towards target audience.

Message Date(s): Ongoing

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

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

If yes, describe why the change was made:

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### **BMP:Stormwater Information for Developers**

Message Description and Distribution Method:

Public outreach material on the following subjects:

- Disturbing 1 Acre or More?
- What you Can Do As a Developer
- Builder's Guide to Low-Impact Development
- Construction Tips

Targeted Audience: Developers (construction)

Responsible Department/Parties: Engineering

Measurable Goal(s):

Town stormwater website is operational and continually updated based on questions and concerns that arise, with sections directed towards target audience.

Message Date(s): Ongoing

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

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

If yes, describe why the change was made:

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### **BMP:Stormwater Management**

Message Description and Distribution Method:

Requirements regarding new construction have been communicated to developers and contractor via planning board.

Targeted Audience: Developers (construction)

Responsible Department/Parties: Planning Board

Measurable Goal(s):

Requirements have been clearly communicated with the engineering company and contractors before the applications are submitted for reviews.

Message Date(s): Ongoing

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

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

If yes, describe why the change was made:

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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:**

The latest version of the SWMP is available Online with a link to email comments or questions.

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:**

Worked with the Concord Public Schools Department's Elementary School Science Coordinator, Staff visited

all 5th grade classes within the Concord Public School system (~230 students, across Thoreau Elementary, Alcott Elementary and Willard Elementary schools) on January to provide special water resources presentation. This annual outreach opportunity provides students with an introduction to local water resource issues - touching upon water resources protection (including stormwater management and “unflushables”), the fundamentals of public water system infrastructure, and drinking water quality and conservation awareness. Students were also provided with copies of the “A Homeowner’s Guide to Being Sewer Smart” informational tri-fold brochure. In addition, presentations on the stormwater utility have been given to the League of Women Voters and the Climate Action Group, highlighting actions property owners can take to reduce runoff. Residents have also been informed about stormwater management practices during neighborhood meetings held as part of our roads program.

### **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**

Percent of Phase II map complete:

*Optional: Provide additional status information regarding your map:*

The town updates its stormwater map periodically, as new information is collected. In particular, stormwater catchments were delineated in fiscal year 2022 based on available stormwater infrastructure information, elevation contours, and LIDAR digital elevation models available.

#### **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 above referenced outfall screening data is attached to the email submission
- ☐ The above referenced outfall screening data can be found at the following publicly available 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:

The town visited fourteen locations previously identified as interconnections. During the field observations, the Town determined that these locations have no interconnections and do not require sampling.

### **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 publicly available website:

The contract for wet weather sampling of the identified outfalls has been executed, and CEI has been conducting the sampling throughout this year. The 55 outfalls selected for wet weather sampling were identified through the SVF analysis and the Town's past records. A final report will be provided upon completion of sampling at all 55 outfalls. As the work is weather-dependent, the schedule remains flexible; however, based on the consultant's most recent update, completion is anticipated by next year.

*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:

The majority of catchment investigation took place in year 3, and all of the catchment investigation was completed by year 5. Now we are doing wet weather sampling of the outfalls identified via SVF analysis completed and town's past records.

### **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 publicly available 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 incident report from the Concord Fire Department was submitted with year 5 submittal package.

### **Employee Training**

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

The Town completed its annual IDDE training for appropriate staff on May 13, 2025. The in-person training was provided by Comprehensive Environmental Incorporated and was attended by Public Works engineers, Highway and Grounds crew leaders and operators, and staff from the Water and Sewer Divisions.

### **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:

The total number of site inspections are approximate and include site visits from the Engineering Division, Health Division and Natural Resources Division (NRD) of various projects. The estimated site inspections include pre-construction meetings, soil testing for the septic and stormwater, periodic site visits, and final inspection. Pre-construction meetings/site visits are held by Engineering and NRD to discuss various construction projects which include erosion controls and stormwater management.

## **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:

As-built plans and long-term operation and maintenance (O&M) plans have traditionally been required for non-residential developments and subdivisions. With the implementation of the stormwater utility, we are now encouraging residents to maintain the best management practices (BMPs) on their own properties and provide proof of maintenance in order to receive credit. This approach aims to promote the installation and ongoing upkeep of stormwater infrastructure within private developments.

### **Street Design and Parking Lots Report**

Below, describe any changes made or planned to be made to local regulations and guidelines based on the report completed in Year 4:

The evaluation has been finalized, and the town is currently engaged in the process of formulating revisions to local regulations and guidelines as advised in the report.

### **Green Infrastructure Report**

Below, describe progress towards making green infrastructure practices allowable based on the report completed in Year 4:

Concord have been promoting Sustainable landscape, usage of rain barrels and rain garden. Detail information regarding planning and design, construction and installation and maintenance can be found on Sustainable landscape handbook.

### **Retrofit Properties Inventory**

Below, list remaining permittee-owned properties that could be modified or retrofitted with BMPs to mitigate impervious areas (must maintain a minimum of 5 sites in inventory until less than 5 sites remain):

55 Church Street

8A Conant Street  
12 Main Street  
9A Stow Street  
Silver Hill Road Neighborhood Infrastructure Improvements Phase I

Below, list all properties that have been modified or retrofitted with BMPs to mitigate impervious area that were inventoried as part of 2.3.6.d of the permit and the type of BMP(s) implemented. Non-MS4 owned properties that have been modified or retrofitted with BMPs to mitigate impervious area may also be listed, but must be indicated as non-MS4.

Main St. & Walden St  
Ripley Hill Road  
835/1231 Old Marlboro Rd, Concord, MA 01742 (Sanborn Middle School)  
Highland Street  
Silver Hill Road Neighborhood Infrastructure Improvements Phase II

## 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:

*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: 8

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

The SWPPP is in place for Town facilities, and structural/maintenance actions have been implemented, including sweeping or vacuuming paved areas to remove accumulated debris, repairing leaking equipment, tanks, or vehicles, and improving containment around salt, sand, or chemical storage areas.

**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 publicly available 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**

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.



## Year 8

### **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 8 requirements summarized below. (Note: impaired waters and TMDL requirements are not listed below)

Yes, I agree ☒

### **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)
- Identify additional permittee-owned properties that could potentially be modified or retrofitted with BMPs to reduce impervious areas so that the permittee maintains a minimum of 5 sites in their inventory, until such a time when the permittee has less than 5 sites remaining

Provide any additional details on activities planned for permit year 8 below:

The Town has approved the Stormwater Utility, along with the associated budget and fees for FY26. We are
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currently in the process of setting up the billing platform, after which revenue collection will begin. The funds generated through the utility will be used to meet the obligations outlined in the MS4 permit.

## Part V: Certification of Small MS4 Annual Report 2025

### **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.

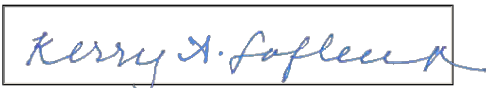
Name:

Kerry A. Lafleur

Title:

Town Manager

Signature:



Date:

09/26/2025

*[Signatory may be a duly authorized  
representative]*