

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: Town of Sterling

EPA NPDES Permit Number: MAR041222

Primary MS4 Program Manager Contact Information

Name: Ryan Mouradian

Title: DPW Superintendent

Street Address Line 1: 171 Worcester Rd

Street Address Line 2:

City: Sterling

State: MA

Zip Code: 01564

Email: RMouradian@sterling-ma.gov

Phone Number: (978) 422-6767

Stormwater Management Program (SWMP) Information

SWMP Location (publicly available web address): https://www.sterling-ma.gov/sites/g/files/vyhlif1266/f/uploads/sterling_swmp_2023.pdf

Date SWMP was Last Updated: Jun 30, 2023

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 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:

- ☒ 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:

SWPPP implementation unchecked bc inspections forms were not filed.

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

Details of the social media posts made thru the Towns partnership with the CMRSWC are attached with this report submission.

Agenda for the IDDE Training session facilitated by the WCHA is attached with this report submission.

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:

Changes in 2018/2020 Integrated List of Waters:

1. Waschacum Brook - Updated from Category 3 to Category 5. Impairment added for dissolved oxygen.
2. West Waushacum Pond - Updated from Category 3 to Category 4c. Impairments added for Brittle Naiad, Najas Minor and Non-Native Aquatic Plants (impairments not requiring a TMDL).
3. The Quag - Updated from Category 3 to Category 4c. Impairments added for Brittle Naiad, Najas Minor and Non-Native Aquatic Plants (impairments not requiring a TMDL).

No changes in the 2022 Integrated List of Waters.

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: 9

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. DPW Open House: Impact of Road Salt on Surface Waters

Message Description and Distribution Method:

At Sterling DPW Annual Open House and Touch-a-Truck event, DCR Division of Water Resources attended and setup a display table providing information and educational materials on road salt use and its impact in the watershed as well as an EnviroScape Pollution Prevention display (interactive) illustrating point and non-point pollution sources and impacts to the environment. Salt Brine recipe cards were created and handed out at this event.

Targeted Audience: Residents

Responsible Department/Parties: DPW Operations, DCR

Measurable Goal(s):

Inform general public on the impact of road salt on surface waters.

Message Date(s): 5/3/2025

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:

DCR Partnership

BMP:2. DCR Stormwater Brochures

Message Description and Distribution Method:

Hardcopies of DCR brochures that address a range of stormwater issues specific to homeowners, businesses, and developers are available at the Town Hall. There were 25 brochures re-stocked at the Sterling Town Hall during this reporting period. The Road Salt outreach materials were updated during this reporting period.

Targeted Audience: Residents, Businesses, and developers

Responsible Department/Parties: DPW Operations, DCR

Measurable Goal(s):

Inform general public (all audiences) about stormwater issues. 25 brochures re-stocked.

Message Date(s): Year-round

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:3. DCR Educational Programs

Message Description and Distribution Method:

DCR Rangers and education staff provide educational programs to students and the general public throughout the year that address a variety of topics including stormwater issues. Stormwater pollution prevention public service announcements are read by Ranger staff at public interpretive programs.

Interpretive programs that included a stormwater message about the water cycle and watersheds were held at the elementary schools.

Targeted Audience: Residents

Responsible Department/Parties: DPW Operations, DCR

Measurable Goal(s):

Inform general public about stormwater issues.

Message Date(s): Multiple

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:

DCR Partnership

BMP:4. Road Salt/Sand Mix Educational Sign

Message Description and Distribution Method:

DCR provided the Sterling DPW Director with a "Salt Smarter, Not Harder - Ways to Reduce Salt Use" metal placard that has been placed on the residential salt/sand containment shed in the DPW Yard.

Targeted Audience: Residents

Responsible Department/Parties: DPW Operations, DCR

Measurable Goal(s):

Targeted message to residents that utilize the Town's salt/sand supply

Message Date(s): Winter/road salt season

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:

DCR Partnership

BMP:5. DCR Household SWPP Brochure Mailing

Message Description and Distribution Method:

The DCR Household Stormwater Pollution Prevention brochure has been included in mailings to all new homeowners listed in land transfers

Targeted Audience: Residents

Responsible Department/Parties: DPW Operations, DCR

Measurable Goal(s):

Targeted message to new residents.

Message Date(s): Year-round.

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:

DCR Partnership

BMP:6. DCR Wachusett Dam Day

Message Description and Distribution Method:

Wachusett Dam Day was held spring 2025 with over 1,000 people in attendance. A table was set up with a hands-on Enviroscape model demonstrating stormwater impacts and stormwater pollution prevention. DCR staff also provided educational brochures and handouts.

Targeted Audience: Residents

Responsible Department/Parties: DPW Operations, DCR

Measurable Goal(s):

1,000 people in attendance

Message Date(s): 5/10/2025

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:

DCR Partnership

BMP:7. DCR Clean Water Makes Great Beer

Message Description and Distribution Method:

Building upon DCR's "Clean Water Makes Great Beer" campaign throughout the watershed, posters were developed and are displayed at 24 retail establishments. Coasters were also designed and 2,000 were delivered to local restaurants and bars where they were utilized during National Drinking Water Week.

Targeted Audience: Residents

Responsible Department/Parties: DPW Operations, DCR

Measurable Goal(s):

24 retail establishments and 2,000 coasters delivered to local restaurants

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:

DCR Partnership

BMP:8. DCR Stormwater Videos

Message Description and Distribution Method:

DCR Water Supply Education staff produced several videos on topics such as stormwater pollution, "The Importance of Road Salt Reduction", "Make Your Own Salt Brine", and "Salt Smarter, Not Harder!" All videos can be found and linked to on the DCR YouTube website at: MassDCR - YouTube.

Targeted Audience: Residents, businesses

Responsible Department/Parties: DPW Operations, DCR

Measurable Goal(s):

Inform general public about stormwater issues.

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:

DCR Partnership

BMP:9. CMRSWC Social Media Posts

Message Description and Distribution Method:

Sterling is a member community of the Central Massachusetts Regional Stormwater Coalition (CMRSWC). The CMRSWC manages a very active social media account on several platforms with posts about stormwater issues covering a variety of topics including winter deicing, lawn care, pet waste disposal, septic system maintenance, leaf and yard waste, and including messages targeted at residents, businesses, industrial sites, and developers.

Targeted Audience: ALL

Responsible Department/Parties: Conservation Committee

Measurable Goal(s):

January 6, 2025 to July 31, 2025 CMRSWC has delivered messages across Facebook, Instagram, and Twitter (X), publishing over 1,100 posts in total, resulting in a combined reach of more than 33,000 users across all audiences.

Message Date(s): January 6, 2025 through July 31, 2025

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:

CMRSWC Partnership

Add an Educational Message

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

The SWMP is available on the Town's website.

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:**

Household Hazardous Products (HHP) collection (10/26/24) and Latex Paint collection (7/6/24, 8/3/24, 9/7/24, 10/5/24, 5/3/25, 6/7/25) through the Wachusett Watershed Regional Recycling Center. Link provided on Town website.

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

Percent of Phase II map complete: 100

Optional: Provide additional status information regarding your map:

Phase I and II mapping requirements were completed prior to this reporting period. The Phase II map will continue to be updated as-needed to reflect IDDE findings.

The DCR has also done extensive mapping of catchbasins and stormwater drainage structures. DCR staff continues to improve and update maps with both online corrections and field inspections and will coordinate efforts with the watershed communities. An effort is underway to develop connectivity and flow direction information for compliance with the updated MS4 permit.

Screening of Outfalls/Interconnections

If conducted, please submit any outfall monitoring results from this reporting period. Outfall monitoring results should include the date, outfall/interconnection identifier, location, weather conditions at time of sampling, precipitation in previous 48 hours, field screening parameter results, and results from all analyses. Please also include the updated inventory and ranking of outfalls/interconnections based on monitoring results.

- ☒ No outfalls were inspected
- ☐ The 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: 0

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

Percent of outfalls screened: 100

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

100% of known stormwater outfalls owned by the Town within the MS4 regulated area were screened/sampled during dry weather prior to 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 publicly available website:

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

Number of catchment investigations completed this reporting period: 0

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

Percent of total catchments investigated: 47

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

29 catchments investigations were determined to be complete during a prior reporting period, including catchments where 2021 outfall screening was dry or below all IDDE screening thresholds and there are no upstream junction manholes.

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 Town does not own/operate a sanitary sewer or combined system. DCR personnel continue to look for illicit discharges or other stormwater problems during routine stream investigations and will pass on any relevant information to the towns (no issues identified during this reporting period).

Employee Training

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

Stormwater issues are discussed frequently during regularly scheduled DPW staff meetings. DPW Superintendent and DPW Foreman also attended a Worcester County Highway Association (WCHA) meeting 4/29/2025 focused on stormwater: "Draft 2024 MS4 Permit, What's New? Implications to Municipal Operations and Budgets. Any Support from Regional and State Organizations? What Help will Municipalities Need to Comply?."

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: 13

Number of enforcement actions taken: 0

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

Town: The Town planning board approved 8 site plans. Graves Engineering on behalf of the town issued 19 peer review letters (site plan reviews, ZBA plan reviews etc), performed 13 site visits for monitoring construction or to observe site conditions to support the peer reviews. No enforcement actions were required.

DCR: Routine inspections of construction sites that disturb more than one acre are done by the DCR EQ staff during dry and wet weather. There were no SWPPP compliance monitoring inspections for EPA Construction General Permits during the July 1, 2024 - June 30, 2025, period.

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

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

The assessment identified several potential updates to local regulations that could reduce the amount of impervious cover for future new development and redevelopment projects. These items will be considered if updates to the regulations are made in the future. None currently planned.

Green Infrastructure Report

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

The Town's existing local regulations do not contain any language that would prohibit or hinder the ability to

implement green infrastructure practices when appropriate site conditions exist. The Town drafted updates to stormwater regulations to comply with section 2.3.6.a of the MS4 Permit in 2021 which addresses post-construction stormwater runoff from new development and redevelopment sites. The regulations need to be approved thru Con Com, and unfortunately there has been a constant turnover of the Town Conservation Agent for the past several years. The Town's next Con Com agent will be starting in a few weeks.

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):

Town parcels: Fire Dept, DPW, Light Dept, Light Plant Ops, Police Dept. See comment under SWPPP section about plans for the DPW Facility.

Town ROW: The Town is about to undertake a large stormwater project on Swett Hill Road which includes installing closed drainage and two large stormwater basins. Con com hearing for the NOI just occurred and the plan is to construct next year (2026).

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.

Town-owned: An infiltration trench and swale with check dams and rain garden/detention pond were installed at the Town Beach (completed June 2024). These BMPs are located within the Town's regulated MS4 area. DPW Superintendent has been inspecting the BMPs bi-monthly since installation.

DCR: The DCR continues to monitor and map structural best management practices (BMPs) in the watershed. To date, 72 BMPs (including sediment forebays, drywells, infiltration trenches, Stormceptors, and detention basins) have been mapped within Sterling and are part of a larger Geographic Information System (GIS) hydrology layer project.

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: 1,687

If applicable:

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

1,687 catch basins town-wide, however only ~460 catch basins are located within the urbanized area.

Street Sweeping

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

☒ Number of miles cleaned: 93.75

☐ Volume of material removed: [Select Units]

☐ Weight of material removed: [Select Units]

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: 0

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

The Town is planning to construct a new DPW facility at a new site. One of the driving factors to not re-using the existing DPW site is stormwater management concerns and not having enough space to properly treat stormwater. The current schedule is to bid the project in 2026 and have construction complete in 2028 (contingent on town meetings and funding). The new facility will provide better stormwater management on the site and include stormwater BMPs.

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:

DCR:

- DCR monitors stormwater basins located on DCR property within the Town to determine if there are any maintenance needs. One DCR Basin site in Sterling was inspected during the reporting period (Route 62/140).
- Biweekly samples for bacteria, turbidity, and specific conductance were collected by DCR from two tributaries in Sterling and monthly nutrient samples were collected at one location.
- DCR performed regular site visits in the fall of 2024 and the spring of 2025. DCR staff also spot checked periodically after larger storm events.
- All agricultural sites are regularly monitored by DCR staff for stormwater related issues such as erosion and manure runoff.

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.

The town of Sterling was awarded a \$16,583 Salt Use Reduction Grant 50/50 match to purchase and install a closed loop spreader controller in a large salt truck. Closed loop controllers take the human element out of salt spreader controls and allow a fixed calibration to be entered into the system. Also included in the grant was matching funds to purchase flexible plow blades to outfit one loader, one one-ton truck, two pickup trucks, and increase the effectiveness of other larger trucks that already have flexible plow blades. These flexible plow blades will improve the quality of snow removal thus reducing salt usage.

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:

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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:

Blaine Bershad

Title:

DPW Board Chairman

Signature:



Date:

9/24/25

[Signatory may be a duly authorized representative]