



TOWN OF BURLINGTON

5-1-07

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April 25, 2007

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Ms. Ann Herrick
United States Environmental Protection Agency
1 Congress Street
Suite 1100 (CIP)
Boston, Massachusetts 02114-2023

Annual Report - Reporting Period May 1, 2006 to May 1, 2007 **Town of Burlington - Storm Water Management Program**

To: Environmental Protection Agency

Attached to this transmittal letter is the Annual Report for the Town of Burlington's Storm Water Management Program for the reporting period May 1, 2006 to May 1, 2007.

This report combined with this transmittal letter constitutes a self-assessment review of compliance with the permit conditions. The attached report is constructed in table format to facilitate review of the progress on each Best Management Practice. The table contains a(n):

- assessment of the appropriateness of the selected BMPs
- assessment of the progress toward achieving the measurable goals
- summary of results of any information collected to date
- discussion of activities for the next reporting cycle
- discussion of any changes in identified BMPs or measurable goals

The Town of Burlington accomplished the following major activities during the 4th permit year:

- Implemented a storm sewer stenciling project in a cooperative effort between the Burlington School Department and the Burlington Department of Public Works. This event took place on April 21, 2007. Ten (10) students participated with DPW personnel who provided logistics and safety services. The list of streets where storm sewers were stenciled include: Spruce Hill, Valley, Shady Lane, Woodside, Pine Ridge, Partridge, Willow Way, Hickory Lane, Demone, Mark, Hope and Laurel Hill.
- Assigned names to the tributaries of named waterbodies. As required (but deferred) in our original permit application, we are providing the naming of tributaries and number of outfalls within each as an attachment to this transmittal letter.

Work started on a draft of our illicit Discharge and Detection Plan. We are planning to finish this plan during the 5th permit year.

- Developed and obtained Town Meeting approval for a bylaw to prohibit non-storm water discharges into the Town's storm water system, including the provisions for the appropriate enforcement procedures and actions. Approval of this bylaw was subsequently obtained by the State Attorney General.

The "Illicit Discharge and Detection Bylaw" is a prohibition-type bylaw prohibiting illegal discharges, illegal connections, and illegal obstructions to Burlington's municipal storm water system.

The Board of Health is the lead agency. This bylaw also gives the Board of Health the authority to request information from non-NPDES permitted facilities and conduct site visits when probable cause of an illegal discharge exists. The Board of Health also has the authority to promulgate regulations of "best management practices" and require non-NPDES facility owners to comply if a pollutant discharge is in question.

- Developed and obtained Town Meeting approval of a bylaw requiring the implementation of proper erosion and sediment controls on applicable construction sites. Approval of this bylaw was subsequently obtained by the State Attorney General.

The "Erosion and Sedimentation Control Bylaw" implements a permit program that controls polluted runoff, and requires the implementation of erosion and sedimentation controls on construction sites (for applicants proposing 10,000 ft² or greater of land disturbance).

Burlington's Erosion and Sedimentation Control Bylaw has novel features to make the permitting experience more streamlined and efficient for the regulated public. These features are:

- Permitting is the joint responsibility of both the Conservation Commission and the Planning Board. The majority of projects applications (having routine erosion control requirements) will be heard by the Planning Board for issuance of this permit at the same time with other matters on the same project, which are already pending before the Planning Board. Proposed projects that have potentially significant erosion and water quality runoff issues, will be heard in a separate hearing before the Conservation Commission.
- This bylaw provides for the permitting of smaller land disturbances (10,000 to 20,000 ft²) with a much simplified process. Homeowners will be the most likely applicants for these sized land disturbances. For these sites, homeowners will have minimal fees, no hearing necessary, reduced waiting period, and minimum application requirements. The applicant gets a "standard" permit listing best management practices that must be adhered to.
- No permits are required for land disturbances less than 10,000 ft². However, if substantial erosion from a small land disturbance occurs into the street and flows into our storm drain system, enforcement authority under this bylaw is granted to the Planning Board / Conservation Commission for land disturbing activities greater than 500 ft² (even though no permit is required).

If you have any questions or comments regarding the above or the attached annual report, please contact John Sanchez, DPW Superintendent, at Tel (781) 270-1670.

Sincerely yours,



Robert Mercier, Town Administrator
Town of Burlington, Massachusetts

Public Education and Outreach - Annual Report
Town of Burlington - Storm Water Management Program
Reporting Period: May 1, 2006 to May 1, 2007

BMP ID #	BMP Description	Measurable Goal	Progress Toward Achieving Goals	BMP Still Approp 'yes / no'	Activities for 5 th Reporting Cycle	Changes Req'd in BMP 'Yes / No'	Comments, Notes, and/or Summary of Results
1 - 1	Develop brochure and / or fact sheet for homeowners	Final drafts - 1st yr; review by SWMC; distribute 2nd year	Extensive research done to identify resources materials. Pamphlet for homeowner has been drafted and reviewed by SWMC. Edits were incorporated. Brochure was mailed to all residents within Town.	Yes	None - completed	No	Completed - Brochure addresses 'What is storm water pollution', 'What you can do', auto maintenance, yard work, herbicides and pesticides, landscaping, and painting.
1 - 2	Develop brochure and fact sheet for sector businesses	Draft within 2nd year; review by SWMC; distribute 3rd year	Draft brochure for business sectors was reviewed by BOH staff for food service facilities and finalized. Brochure was formatted, printed, addressed and mailed to all businesses within the Town of Burlington.	Yes	None - completed	No	Completed - Draft brochure for business sectors was reviewed by BOH staff for food service facilities and finalized. Brochure was formatted, printed, addressed and mailed to all businesses within the Town of Burlington. Brochure addresses: - general best practices for all - landscape contractors - food service facilities - automotive repair shops
1 - 3	Collect / assemble educational materials for school use	Discuss with schools and collect materials 3rd year; implement into curriculum in 4th yr	Efforts were made to identify educational materials for school use during 1 st and 2 nd permit years.	Yes	Additional search for resources will take place during the next reporting period.	Maybe	Ongoing - Adequate resource materials not identified (except for EPA placemat and stickers). A meeting was held in May 2006 with EPA personnel. EPA agreed to send a resource disk with additional materials that may be useful to schools. Additional efforts will be made to identify educational materials in the 5 th year. Also, this curricula topic may not be a priority for schools compared with other objectives.

1 - 4	Place educational materials for BMPs 1-3 in library	If suitable materials found, discuss with library and place materials in library in 4th year	Some materials identified. Additional materials will be researched during the 4th year as per BMP 1.3.	Yes	Implement BMP1-3	No	<u>Ongoing</u> - Intent was to place educational materials for children in library. If resources are identified, this will be done (as per BMP 1-3).
1 - 5	Add storm water information and links to Town web site	Convert materials to pdf format in 4th yr; develop web pg 5th yr	No progress during this reporting period.	Yes	Identify web references and install on web site	No	<u>Ongoing</u> - Additional resources needed for labor to generate a new web page. This activity may be budget constrained.
1 - 6	Publicize SWMC meetings for public education opportunities	Conduct at least 4 public meetings in 5 years	4th Annual SWMC meeting to be held in summer 2006. Press releases will be issued to local newspapers.	Yes	Will continue	No	<u>Completed to date</u> – 4 th Annual Meeting scheduled for Summer 2007

Public Involvement and Participation - Annual Report

Town of Burlington - Storm Water Management Program

Reporting Period: May 1, 2006 to May 1, 2007

BMP ID #	BMP Description	Measurable Goal	Progress Toward Achieving Goals	BMP Still Approp 'yes / no'	Activities for Next Reporting Cycle	Changes Req'd in BMP 'Yes / No'	Comments, Notes, and/or Summary of Results
2 - 1	Document existing public involvement opportunities	Summarize in 1st annual report	No activity	No	None	Yes	<u>Not continued</u> - Summary of existing public involvement opportunities(BMP 2-1) is not useful, since these opportunities are now being created under the EPA permit (i.e., Annual SWMC meeting, hearings on new bylaws, etc). This BMP will not be continued.
2 - 2	Publicize participation opportunities with Shawsheen, Mystic River, and Ipswich Watershed Associations	Monitor publicity generated in local newspapers during permit term. Provide assistance to ensure publicity if needed.	No activity	Yes	Continue monitoring for publicity of appropriate events.	No	<u>No action needed</u> - Activities of the Shawsheen, Mystic River, and Ipswich Watershed Associations are periodically publicized in the local newspaper. Further effort under this permit to publicize these activities is redundant and not needed. We will monitor to ensure that events are publicized and assist if needed.
2 - 3	Plan and implement projects with High School environmental group	Develop plan and implement projects during 4th and 5th years of permit	Initial conversations were held with Dr. David Luther (now retired) from the High School - Environmental Science program and leader of Students for Environmental Action club. We have renewed contact with Ms. Jill McInerney at the High School. A storm sewer stenciling project took place on April 21, 2007. Ten (10) students participated with DPW personnel who provided logistics and safety services	Maybe	Additional streets may be targeted for stormwater catch basin stenciling during the 5 th permit year.	No	<u>Completed</u> - The list of streets where storm sewers were stenciled include: - Spruce Hill - Valley - Shady Lane - Woodside - Pine Ridge - Partridge - Willow Way - Hickory Lane - Demone - Mark - Hope - Laurel Hill

2 - 4	Publicize SWMC meetings for opportunities for public involvement	Maintain copies of publicity in file over 5 year permit term	3 rd Annual SWMC meeting held first quarter 2006. Press releases were issued to local newspapers.	Yes	Press releases will continue to be issued.	No	<u>Completed to date</u>
2 - 5	Issue press releases when storm water materials in library	Maintain copies of publicity in file over 5 yr permit term	Efforts were made to identify educational materials for school use during 1st and 2nd permit year. These resources would also be placed in the library. Adequate resource materials not identified (except for EPA placemat and stickers). Additional efforts will be made to identify educational materials; delay until 5th year.	Yes	Press releases will be issued when materials for library is ready.	No	<u>Ongoing</u> - See BMP 1-4

Illicit Discharge Detection and Elimination - Annual Report

Town of Burlington - Storm Water Management Program

Reporting Period: May 1, 2006 to May 1, 2007

BMP ID #	BMP Description	Measurable Goal	Progress Toward Achieving Goals	BMP Still Approp 'yes / no'	Activities Next Reporting Cycle	Changes Req'd in BMP 'Yes / No'	Comments, Notes, and/or Summary of Results
3 - 1	Map storm water system and outfall locations	Complete map and outfall database by end of 2nd permit year	The GIS mapping and outfall database is now complete.	Yes	None	No	Completed - during 2nd permit year. Work left on mapping such as corrections to flow direction and the addition of some outfall locations was finished.
3 - 2	Finish map database and assign names for tributaries that discharge into named waterbodies	Finalize database in 2nd year; submit revised waterbodies list to EPA / DEP as permit modification if needed; and update mapping database in 3rd and 5th years from manual checking selected data.	Completed - GIS mapping and outfall database is 100 percent complete.	Yes	Submit information as needed to EPA.	No	Completed - GIS mapping and outfall database is 100 percent complete during 2nd permit year.
3 - 3	Develop sampling and analysis plan for dry weather flows	Plan completed in year 1.	Completed	Yes	None	No	Completed - A plan was developed during 1st permit year to sample 5 locations of dry weather flows detected during the mapping field verification. Two samples were collected from each location.
3 - 4	Visually inspect outfalls for dry weather flows	Selective inspection 1st & 2nd year; spot inspection yrs 3-5, inspection records in program file	Town-wide inspection for first year was completed.	Yes	Selected inspections will be done if needed	No	Completed - A field check of the entire town was completed as part of field verification to support the mapping activity. Five (5) outfalls were identified as having dry weather flows.

3 - 5	Conduct sampling at outfalls with dry weather flows	Conduct sampling - selected outfalls in 1st yr; selected additional sampling in years 3 & 5 if needed; results in program file	Sampling and analysis activities were completed at 5 outfall locations during 1st permit year.	Yes	Additional sampling will be done if needed	No	<u>Completed</u> - Each outfall location was sampled for bacteria, ammonia, surfactants, conductivity, and fluorides. Since no flowing water was occurring at 4 of 5 sites, samples of standing water at the mouth of pipe were taken. Based on these results, no illicit connections are believed to exist at these locations.
3 - 6	Develop training materials for DPW / others for illicit discharge	Develop training materials in 5th year	No activity during this year	Yes	Develop training materials in 5th year	No	<u>Ongoing</u> - Rescheduled for completion in 5th year.
3 - 7	Review current bylaws / regs relevant to illicit discharge - Burlington and other towns	Review was completed in 1st year	Complete	Yes	None	No	<u>Completed</u> - Extensive effort was made during the 1st permit year to identify bylaws in use by others districts (nationwide). Bylaws have been obtained that will serve as a model for Burlington's adoption and implementation of an illicit discharge bylaw. A review of these bylaws has been completed.
3 - 8	Develop bylaw to prohibit illicit discharge	Develop draft bylaw in 3rd year and brought to Town Meeting in 4th year for approval	Draft illicit discharge bylaw was presented to Planning Board, Board of Health, Conservation Commission, Board of Selectmen, and Town Bylaw Review Committee. Draft bylaw has also been reviewed by Town Counsel. Comments were incorporated. Presentation was made to September 2006 Town Meeting.	Yes	None	No	<u>Completed</u> - Comments by Town Boards and Committees have been incorporated. Meetings and public hearings were held with various Town Departments to arrive at a consensus on implementation logistics for a new bylaw. Review by Town Counsel was completed. Town meeting approved bylaw in 4th permit year at the September 2006 Town Meeting. Approval of this bylaw was subsequently obtained by the State Attorney General.
3 - 9	Develop illicit discharge and detection plan	Draft plan to be finalized in 5th year.	Draft of Illicit Discharge and Detection Plan completed.	Yes	Final plan to be completed during the coming year	No	<u>Ongoing</u> - Finalization of plan has been scheduled for the 5th year.

3 - 10	Train DPW personnel to recognize illicit discharges	Train DPW / others in 5th year (which is after BMP 3-9 completed).	No activity scheduled for this reporting period.	Yes	Hold training sessions during 5 th permit year	No	<u>Ongoing</u> - Delayed until 5th year since it depends on completing BMP 3-9.
3 - 11	Implement discharge and detection plan	Plan will be implemented in year 5 and will be documented by records of activities relative illicit discharge and detection.	No activity scheduled for this reporting period.	Yes	Initial activities may include sampling of impaired waters for coliform bacteria.	No	<u>Ongoing</u> – Initial activities of illicit discharge and detection has been scheduled for 5th year.

Construction Site Storm Water Runoff Control - Annual Report

Town of Burlington - Storm Water Management Program

Reporting Period: May 1, 2006 to May 1, 2007

BMP ID #	BMP Description	Measurable Goal	Progress Toward Achieving Goals	BMP Still Approp 'yes / no'	Activities for Next Reporting Cycle	Changes Req'd in BMP 'Yes / No'	Comments, Notes, and/or Summary of Results
4 - 1	Collect and summarize other towns' sedimentation and erosion control bylaws	Sample bylaws collected, will be put in file for review.	Other districts' bylaws were found and reviewed.	Yes	None	No	<u>Completed</u> - Extensive effort was made to identify other districts' bylaws as a model has been completed. Review of these bylaws has been completed.
4 - 2	Summarize existing bylaws and regs within Burlington for evaluating storm water impacts	Summary memo to file (completed in 1st year)	Not completed	No	None scheduled	Yes	<u>Not continued</u> - The MA State Wetlands Protection Act and Burlington's Bylaw Articles XIV (Wetlands Protection) are the main regulations that offer evaluation of storm water impacts. These regulations are well known to Town residents. An additional summary memo would not provide any significant additional value.
4 - 3	Conduct meetings with various stakeholders in Town to obtain input regarding erosion bylaw implementation	Notes summarizing the results of these meetings (completed in 1st or 2nd year) in the form of minutes of meeting taken during Annual SWMC meeting.	Discussions were held with various stakeholders in Town. Numerous public meetings were held.	Yes	None	No	<u>Completed</u>

4 - 4	Develop draft sedimentation and erosion control bylaw and obtain final approval	Develop draft bylaw in 3rd year and brought to Town Meeting in 4th year for approval	Draft erosion bylaw was presented to Planning Board, Board of Health, Conservation Commission, Board of Selectmen, and Town Bylaw Review Committee in public meetings. Draft bylaw has also been reviewed by Town Counsel. Comments were incorporated. Presentation was made to September 2006 Town Meeting.	Yes	None	No	<u>Completed</u> - Comments by Town Boards and Committees have been incorporated. Meetings and public hearings were held with various Town Departments to arrive at a consensus on implementation logistics for a new bylaw. Review by Town Counsel was completed. Town meeting approved bylaw in 4th permit year at the September 2006 Town Meeting. Approval of this bylaw was subsequently obtained by the State Attorney General.
4 - 5	Develop site inspection checklists to support bylaw implementation	Draft checklists completed in 5th year	No activity scheduled for this reporting period	Yes	To be done in 5th permit year. No activity scheduled for the next reporting period.	No	<u>Ongoing</u>

Post Construction Stormwater Management - Annual Report

Town of Burlington - Storm Water Management Program

Reporting Period: May 1, 2006 to May 1, 2007

BMP ID #	BMP Description	Measurable Goal	Progress Toward Achieving Goals	BMP Still Approp 'yes / no'	Activities for Next Reporting Cycle	Changes Req'd in BMP 'Yes / No'	Comments, Notes, and/or Summary of Results
5 - 1	Collect and summarize other towns' sedimentation and erosion control bylaws for post construction control	Sample bylaws collected, will be put in file for review.	Other districts' bylaws were found and reviewed.	Yes	None	No	<u>Completed</u> - Extensive effort was made to identify other districts' bylaws as a model has been completed. Review of these bylaws has been completed.
5 - 2	Summarize existing bylaws and regs within Burlington for eval stormwater impacts for post construction control	Summary memo to file (completed in 1st year to be done with BMP 4-2)	Not completed	No	None scheduled	Yes	<u>Not continued</u> - The MA State Wetlands Protection Act and Burlington's Bylaw Articles XIV (Wetlands Protection) are the main regulations that offer evaluation of storm water impacts. These regulations are well known to Town residents. An additional summary memo would not provide any significant additional value.
5 - 3	Conduct meetings with various stakeholders in Town to solicit input on implementing bylaw for post construction control	Notes summarizing the results of these meetings (completed in 1st or 2nd year) in the form of minutes of meeting taken during Annual SWMC meeting.	Discussions were held with various stakeholders in Town. Numerous public meetings were held.	Yes	None	No	<u>Completed</u>

5 - 4	Develop draft sedimentation and erosion control bylaw and obtain final approval for post construction control	Develop draft bylaw in 3rd year and brought to Town Meeting in 4th year for approval	Draft erosion bylaw was presented to Planning Board, Board of Health, Conservation Commission, Board of Selectmen, and Town Bylaw Review Committee in public meetings. Draft bylaw has also been reviewed by Town Counsel. Comments were incorporated. Presentation was made to September 2006 Town Meeting.	Yes	None	No	<u>Completed</u> - Comments by Town Boards and Committees have been incorporated. Meetings and public hearings were held with various Town Departments to arrive at a consensus on implementation logistics for a new bylaw. Review by Town Counsel was completed. Town meeting approved bylaw in 4th permit year at the September 2006 Town Meeting. Approval of this bylaw was subsequently obtained by the State Attorney General.
5 - 5	Develop site inspection checklists to support bylaw implementation for post construction control	Draft checklists completed in 5th year	No activity scheduled for this reporting period	Yes	To be done in 5th permit year. No activity scheduled for the next reporting period.	No	<u>Ongoing</u>

Pollution Prevention and Good Housekeeping - Annual Report

Town of Burlington - Storm Water Management Program

Reporting Period: May 1, 2006 to May 1, 2007

BMP ID #	BMP Description	Measurable Goal	Progress Toward Achieving Goals	BMP Still Approp 'yes / no'	Activities for Next Reporting Cycle	Changes Req'd in BMP 'Yes / No'	Comments, Notes, and/or Summary of Results
6 - 1	Summarize existing procedures within Burlington for preventing pollution from parks/open space, fleet, storage yards, roads/parking lots, and storm sewer maintenance activities	Summary memo to file (to be completed in 4th year)	Work has begun to identify and collect existing procedures.	Yes	Complete activity to identify and collect existing procedures in Town during 5 th permit year.	No	<u>Ongoing</u> - Rescheduled for completion in 5th year. Requires interviews with various town personnel.
6 - 2	Summarize existing Town of Burlington programs for preventing pollution (including Recycling, Haz Waste Collection, mercury recycling, activities of stream cleaning committee, and stream cleaning program)	Summary memo to file (completed in 4th year)	Work has begun to assemble materials for this activity.	Yes	Complete summary of existing Town of Burlington programs	No	<u>Ongoing</u> - Rescheduled for completion in 5th year. Requires interviews with various town personnel.
6 - 3	Develop and promulgate procedures (as needed) for controlling pollutant discharges from the maintenance of parks and open space	Procedures to be developed in 5th permit year followed by initial implementation	No activity.	Yes	Draft procedures during 5th year.	No	<u>Ongoing</u> - Rescheduled for completion in 5th and 5th years
6 - 4	Develop and promulgate procedures (as needed) for controlling pollutant discharges from the maintenance of vehicle fleet	Procedures to be developed in 5th permit year followed by initial implementation	No activity.	Yes	Draft procedures during 5th year	No	<u>Ongoing</u> - Rescheduled for completion in 5th and 5th years
6 - 5	Develop and promulgate implement procedures (as needed) for controlling pollutant discharges from the maintenance of storage yards	Procedures to be developed in 5th permit year followed by initial implementation	No activity.	Yes	Draft procedures during 5th year	No	<u>Ongoing</u> - Rescheduled for completion in 5th and 5th years

6 - 6	Develop and promulgate procedures (as needed) for controlling pollutant discharges from the maintenance of streets and parking lots	Procedures to be developed in 5th permit year followed by initial implementation	No activity.	Yes	Draft procedures during 5th year	No	<u>Ongoing</u> - Rescheduled for completion in 5th and 5th years
6 - 7	Develop and promulgate procedures (as needed) for controlling pollutant discharges from the maintenance of storm sewer system	Procedures to be developed in 5th permit year followed by initial implementation	No activity.	Yes	Draft procedures during 5th year	No	<u>Ongoing</u> - Rescheduled for completion in 5th and 5th years
6 - 8	Develop training materials for controlling pollutant discharges from operation and maintenance activities by town personnel	Training materials to be drafted in 5th year	No activity. Not scheduled for this reporting period.	Yes	Draft training materials during 5 th permit year	No	<u>Ongoing</u> - Rescheduled for completion in 5th year.
6 - 9	Finalize training materials and implement training sessions for controlling pollutant discharges from operation and maintenance activities by town personnel	Training materials to be finalized in 5th year and training sessions implemented in 5th year	No activity. Not scheduled for this reporting period.	Yes	Finalize training materials and implement training sessions for controlling pollutant discharges from operation and maintenance activities by town personnel during 5 th permit year.	No	<u>Ongoing</u> - Rescheduled for completion in 5th year

BMPs for Meeting TMDL - Annual Report
Town of Burlington - Storm Water Management Program
Reporting Period: May 1, 2006 to May 1, 2007

BMP ID #	BMP Description	Measurable Goal	Progress Toward Achieving Goals	BMP Still Approp 'yes / no'	Activities for Next Reporting Cycle	Changes Req'd in BMP 'Yes / No'	Comments, Notes, and/or Summary of Results
7 - 1	Continue street sweeping program	Priority to be given in both frequency and priority to Butterfield Pond, Vine Brook, Sandy Brook, and Long Meadow Brook to reduce turbidity (implemented in all 5 years); budget avail for review	Ongoing	Yes	Continue program	No	<u>Completed to date</u> – will continue
7 - 2	Implement illicit discharge & detection plan	Priority given to Long Meadow Brook and Sandy Brook areas which are impaired with pathogens and have TMDLs (to be implemented in 5th year). Records of activity to be placed in program file	No activity scheduled for this reporting period.	Yes	Initial activities may include sampling of impaired waters for coliform bacteria.	No	<u>Ongoing</u>
7 - 3	Implement Control Measures 6-3 to 6-7 to reduce pathogen load and other pollutants contributed by storm sewers to Vine Brook, Sandy Brook and Long Meadow Brook. (repeat from above)	Procedures drafted and implemented in 5th year	No activity during this reporting period	Yes	Draft procedures during 5th year.	No	<u>Ongoing</u> - Scheduled for completion in 5th year
7 - 4	Develop surface water sampling plan (both source and in-stream) for fecal coliform on Vine Brook, Sandy Brook, and Long Meadow Brook (impaired streams)	Develop plan in 5 th year	Not scheduled for this reporting period.	Yes	Plan for surface water sampling of impaired waters for coliform bacteria, will be developed during this permit year.	No	<u>Ongoing</u>
7 - 5	Implement surface water sampling plan	Conduct sampling in 5th year	Not scheduled for this reporting period.	Yes	Initial surface water sampling of impaired waters for coliform bacteria, will be done during this permit year.	No	<u>Ongoing</u>