

**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>

**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:

**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)

*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:

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

### Part III: Receiving Waters/Impaired Waters/TMDL

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

- Yes
- No

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

### Part IV: Minimum Control Measures

Please fill out all of the metrics below. If applicable, include in the description who completed the task if completed by a third party.

#### MCM1: Public Education

Number of educational messages completed during this reporting period:

Below, report on the educational messages completed during this reporting period. For the measurable goal(s) please describe the method/measures used to assess the overall effectiveness of the educational program.

**BMP: Targeted Message**

Message Description and Distribution Method:

The Department of Public Works has a page dedicated to stormwater. The page gives an overview of stormwater, provides information on good stormwater management practices, explains the benefits of proper stormwater management, and what the Town is doing to address stormwater issues. The page also includes a "Think Blue Massachusetts" educational YouTube video. The video breaks down and explains where stormwater pollution can start from, how it affects our environment, and the waterbodies they can discharge into.

Other resource links are available on the Town stormwater page, such as a link to MassDEP, EPA, and a Stormwater 101 video.

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:

**BMP: Additional Educational Messaging - DPW Facebook Page**

Message Description and Distribution Method:

The Town's DPW Facebook page frequently posts various educational messages regarding stormwater pollution sources, proper fertilizer usage, septic system management, and pet waste disposal. Other messaging includes reminders for events such as Clean-up week and Hazardous Waste Disposal Day. Below are educational messages for this permit year.

- 7/19/2024, 4/11/2025, 5/30/2025, 6/6/2025, 6/13/2025, and 6/17/2025: "Household Hazardous Waste Day"
- 7/25/2024: Acton Conservation Division "Water Chestnut @ Ice House Pond Removal"
- 9/17/2024: "Acton Clean-Up Week"
- 9/18/2024: "Municipal Vulnerability Preparedness 2.0 Survey"
- 10/3/2024: "2025 Community Preservation Act Application"
- 10/7/2024: "Ice House Pond Defenders – Invasive Species Education"
- 10/18/2024: "Local Species Education"
- 11/2024: "Keep Fallen Leaves Out of the Street!" Graphic (Municipal Monthly)
- 11/7/2024: "Explore the Storywalk® Project @ the Town Forest Conservation Land"
- 12/2024: "Scoop the Poop" Graphic (Municipal Monthly)
- 12/2/2024: "This Old Land – Land for Conservation"
- 12/3/2024: "Municipal Vulnerability Preparedness 2.0 Webinar"
- 12/30/2024: "Municipal Vulnerability Preparedness 2.0 Survey"
- 1/15/2025: "DPW Facility Open House"
- 1/24/2025: "2025 Polystyrene Collection Schedule"
- 2/11/2025: "Fall in Love with our Beautiful Natural Resource"
- 2/16/2025: "DPW Snow & Road Maintenance/Repair"
- 3/3/2025, 3/14/2025, 3/27/2025: "Happy Migration & Vernal Pool Month"
- 4/4/2025: "DPW Routine Maintenance"
- 4/9/2025: "Remove Invasive Species@ Great Hill Conservation Area"
- 4/17/2025: "Celebrate Earth Week in Acton"
- 5/2025: "Where Stormwater Flows, Everything Goes" Graphic (Municipal Monthly) and Stormwater Management Forum Notice
- 5/1/2025: "Happy American Wetlands Month"
- 5/28/2025: "Stormwater Management in Action"
- 5/30/2025: "Household Hazardous Waste Day"
- 6/4/2025: "Happy Great Outdoors Month"
- 6/4/2025: "June Municipal Monthly"
- 6/26/2025: "Build-A-Trail & Climate Resilient Pocket Park"

Targeted Audience: Residents, Businesses, Institutions, and Commercial/Industrial Facilities

Responsible Department/Parties: DPW Operations

Measurable Goal(s):  
Maintain educational content throughout the Permit term.

Message Date(s): On-going

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: Annual Arbor Day Event Outreach**

## Message Description and Distribution Method:

Various posters and handouts were given to the public who attended the Arbor Day event. The posters and handouts include "Increase Recharge, Decrease Runoff, Put a LID on Stormwater Pollution," "Oil and Water Don't Mix", "Please Scoop the Poop", "Green Lawns without Green Waters", "What's Going Down Your Storm Drain?", "Make the Connection, Storm Drains Empty into Waterbodies", "Where Does All the Litter Go?", "Building a Cleaner Greener Massachusetts", and " Stormwater Matters." The handouts were in an effort to educate the public on to help mitigate contaminated runoff and increase stormwater awareness.

Targeted Audience:

Responsible Department/Parties:

## Measurable Goal(s):

Supplemental messages for water quality impaired waterways and maintain educational content throughout the Permit term.

Message Date(s):

Message Completed for: Appendix F Requirements  Appendix H Requirements

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

If yes, describe why the change was made:

**BMP:Supplemental Message - Do Your "Doody" for Clean Water**

## Message Description and Distribution Method:

The Town attached an educational dog waste flyer along with dog license renewal forms. The flyer informs dog owners on proper dog waste handling and disposal procedures on private and public properties. It also informs owners of how dog waste is harmful to children, plants, and waterways.

Targeted Audience:

Responsible Department/Parties:

## Measurable Goal(s):

Supplemental message for water quality impaired waterways

Message Date(s):

Message Completed for: Appendix F Requirements  Appendix H Requirements

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

If yes, describe why the change was made:



**BMP: Town Meetings / Improvement Notifications**

Message Description and Distribution Method:

Presentations on stormwater management and operation were given at multiple Town Select Board meetings and the Water Resource Advisory Committee. Topics included:

- Asset Management Plan
  - Climate Acton Plan
  - FY Budget Process (January 2025)
  - MS4 Permit/Stormwater Program Funding
  - "How Should We Pay for Stormwater Management" Select Board Meeting (May 2025)
  - Stormwater-Related Insert in Consumer Confidence Reports
- Communication with local groups (Green Acton, OARs, etc.) on stormwater collaborations

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:

**MCM2: Public Participation**

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

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**:

The Acton Department of Public Works (DPW) presented the Town of Acton Stormwater Asset Management Plan to the Select Board and the Water Resources Advisory Committee in multiple separate meetings, during which the Town's current stormwater management and operations were reviewed and discussed.

Additionally, the Town held an Arbor Day event in April 2025. This event was open to the public to participate in a traditional event of planting a magnolia tree to recognize the Town's efforts for a greener environment. Throughout the event, an information station was open to the public that provided information about the Town's programs and organizations. It allowed the Town to distribute education messages, receive comments from the public and answer questions.

### **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 maintains on-going updates to its Storm Sewer Map as necessary to ensure alignment with its operational program and compliance with permit requirements. While all catch basins and manholes have been documented via field inspections and/or record drawings, the verification of the Town's pipe network is on-going, and subsequent updates to the map will be implemented accordingly.

Throughout PY7 the Town has worked to inspect the drainage system and expand upon the Asset Management Plan to develop a more comprehensive plan.

#### **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:

All outfall screening was completed in PY4 and was previously submitted.

*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:*

**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:

*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 Town has identified junction manholes and commenced their investigation process in PY7 completing dry weather CCTV pipe inspections within 32 catchments.

**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:

Acton has focused on identifying and inspecting key junction manholes throughout PY7 for evidence of a suspected illicit discharge or sewage contribution. Additionally, the Town has been inspecting the system for illicit connections while the DPW inspect, repair and replace damaged sections and/or prepare the structures for the annual paving program and other localized road projects.

**Employee Training**

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

The Town of Acton Public Works Department conducts frequent internal meetings/trainings on various aspects of the compliance program. Woodard & Curran held training for the Town's stormwater team on 6/5/2025 and educated staff on the following topics: SWPPP, IDDE, pollution prevention, and good house keeping.

**MCM4: Construction Site Stormwater Runoff Control**

*Below, report on the construction site plan reviews, inspections, and enforcement actions completed **during this reporting period.***

Number of site plan reviews completed:

Number of inspections completed:

Number of enforcement actions taken:

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

## MCM5: Post-Construction Stormwater Management in New Development and Redevelopment

### As-built Drawings

Below, report on the number of as-built drawings received *during this reporting period*.

Number of as-built drawings received:

*Optional:* Enter any additional information relevant to the submission of as-built drawings:

The DPW Engineering Department are working on five as-built submissions and conducted three as-built inspections for PY7.

### 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:

Town of Acton developed the Acton Code and Ordinance Assessment Report (PY4) assessing current street design, parking lot guidelines, and other "code" requirements. The purpose of the report was to identify the possible influence of impervious cover creation or to avoid creating barriers to green infrastructure installations during property development and redevelopment.

During PY5, the Town addressed green infrastructure and influenced site design in several planning documents, including the Climate Action Plan (CAP) and Master Plan. The CAP includes the action that specifically address sustainable and resilience water management, calling for the Town to incorporate green infrastructure in the upcoming Hazard Mitigation Plan and Municipal Vulnerability Preparedness Plan. These public improvements could include: small-scale "vest-pocket" with bioretention areas, rain gardens, playgrounds, and public seating areas.

Additionally, the Town works closely with the Acton Water District (AWD) to continue to explore ways to ensure clean water for current and future generations. As part of these efforts, the Town recently partnered with the AWD to install a water-wise garden with information panels educating the public on sustainable water management practices, complete with a bioswale, rain garden, and plants that help filter stormwater.

### Green Infrastructure Report

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

Town of Acton developed the Acton Code and Ordinance Assessment Report (PY4) assessing current street design, parking lot guidelines, and other "code" requirements. The purpose of the report was to identify the possible influence of impervious cover creation or to avoid creating barriers to green infrastructure installations during property development and redevelopment.

During PY5, the Town addressed green infrastructure and influenced site design in several planning documents, including the Climate Action Plan (CAP) and Master Plan. The CAP includes the action that specially address sustainable and resilience water management, calling for the Town to incorporate green infrastructure in the upcoming Hazard Mitigation Plan and Municipal Vulnerability Preparedness Plan. These public improvements could include: small-scale "vest-pocket" with bioretention areas, rain gardens, playgrounds, and public seating areas.

The Town recently adopted new regulations for the newly established Assabet River Overlay District, an optional overlay district. These regulations include additional stormwater-related standards specific to the overlay district. Accordingly, stormwater management on each LOT must incorporate at least one of the following methods, unless the applicant demonstrates to the Site Plan Special Permit Granting Authority that such measures cannot be accommodated on the LOT: bioretention cells, constructed stormwater wetlands, treebox filters, water quality swales, grass channels, or green roofs.

Additionally, the Town works closely with the Acton Water District (AWD) to continue to explore ways to ensure clean water for current and future generations. As part of these efforts, the Town recently partnered with the AWD to install a water-wise garden with information panels educating the public on sustainable water management practices, complete with a bioswale, rain garden, and plants that help filter stormwater.

### **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):

Kelley's Corner Infrastructure (PY8 in construction/completion)  
 Commuter Rail Parking (design plans approved, permitted and shovel ready in PY7. PY 8/9 in construction)  
 Minuteman Ridge Subdivision (investigation/feasibility underway)  
 Town Hall/Library (Town Hall Library Parking Lot in design approved; PY8/9 in construction)  
 530 Mass Ave (Gardner Field Playground Improvement Project completed)  
 Jones Field Improvement Project (underway)  
 Power Mill Road Complete Street/Streetscape Project (75-100% design completed. PY 8/9 in construction)  
 53 River Street – Old Paving Company (Removal of dam completed, seeking for funding on Phase II)

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.

The Gardner Field Playground Improvement Project was completed in PY6 to install new stormwater treatment infrastructure for a new parking lot. The Town also updated their drainage infrastructure to improve water quality for the Acton Center Improvement Project. Additionally, the Town is in the design phase for the multiple retrofit projects as listed above.

## **MCM6: Good Housekeeping**

### **Catch Basin Cleaning**

*Below, report on the number of catch basins inspected and cleaned, along with the total volume of material removed from the catch basins **during this reporting period.***

Number of catch basins inspected:

Number of catch basins cleaned:

Total volume or mass of material removed from all catch basins:

*Below, report on the total number of catch basins in the MS4 system.*

Total number of catch basins:

*If applicable:*

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

If necessary, schedule adjustments will be made to prioritize catch basins at known problem areas (low spots) and near construction activities. If inspections and maintenance activities indicate excessive sediment and debris loading (i.e.. the sump is more than 50% full during two consecutive routine inspections/cleanings), these catch basins will be marked for more frequent cleaning.

### **Street Sweeping**

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

Number of miles cleaned:

Volume of material removed:

Weight of material removed:

### **Stormwater Pollution Prevention Plan (SWPPP)**

*Below, report on the number of site inspections for facilities that require a SWPPP completed **during this reporting period.***

Number of site inspections completed:

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

Site review is undertaken on a continuous basis during operations. Facility personnel have been trained on the SWPPP and help to reduce exposure of potential stormwater pollutants.

### **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.

The Town has completed the Stormwater Asset Management Plan, which is a valuable resource for addressing future maintenance needs. The plan was presented to the Select Board in the PY6 spring and was put into effect in PY7. The Town is currently undertaking the next round of infrastructure investigations to ensure the continued functionality of their system.

**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:

## 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:  Title:

Signature:  Date:

*[Signatory may be a duly authorized representative]*