

Year 4 Annual Report
Massachusetts Small MS4 General Permit
Reporting Period: July 1, 2021-June 30, 2022

Please DO NOT attach any documents to this form. Instead, attach all requested documents to an email when submitting the form

Unless otherwise noted, all fields are required to be filled out. If a field is left blank, it will be assumed the requirement or task has not been completed. Please ONLY report on activities between July 1, 2021 and June 30, 2022 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 (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 4 Requirements

- Developed a report assessing current street design and parking lot guidelines and other local
 - requirements within the municipality that affect the creation of impervious cover, made it available as part of the SWMP, and:

- No updates were recommended
- Updates were recommended. The anticipated date or date of completion for updates is/was:

To be determined pending discussions between various departments. Estimated June 30, 2027.

- Developed a report assessing local regulations to determine the feasibility of making green
 - infrastructure practices allowable when appropriate site conditions exist, made it available as part of the SWMP, and:

- No updates were recommended
- Updates were recommended. The anticipated date or date of completion for updates is/was:

To be determined pending discussions between various departments. Estimated June 30, 2027.

- Identified a minimum of 5 permittee-owned properties that could potentially be modified or retrofitted with BMPs to reduce impervious cover

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

LID, GI, and Impervious Cover Regulatory Review - Members of the Greenscapes North Shore Coalition reviewed all municipal regulations related to impervious cover creation. The Greenscapes team used the MA Audubon bylaw review tool to evaluate all of the regulations in the context of green infrastructure feasibility and compiled a detailed report of their findings, which also includes recommended improvements for each

regulation reviewed. With guidance and input from municipal staff, timelines for implementation of recommended language were established on a case-by-case basis. The full report and community specific recommendations can be found here: https://greenscapes.org/wp-content/uploads/2022/08/MS4-Grant-Report-FINAL_reduced.pdf

In connection with the bylaw review efforts conducted by the Greenscapes Coalition, two educational webinars were also conducted. The first webinar was held at the onset of the review process and introduced the project scope while detailing the value of encouraging LID practices in municipal codes. This webinar yielded 70 attendees. The second webinar, held following the completion of the review process, was hosted by EPA's Soak Up the Rain and discussed the project results and lessons learned. This webinar had approximately 300 attendees.

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 website:
- Updated system map due in year 2 as necessary
- 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:

SWPPPs - The City previously completed a SWPPP for its DPW Facility located at 39 South Hunt Road and meets all permit requirements for this facility. The SWPPP also addresses a satellite storage facility at 56 South Hunt Road that is used for storage of catch basin cleanings, street sweepings, and winter snow dumping, however, does not adequately address pollutant sources and stormwater controls at the satellite storage area. The SWPPP document will be updated in Year 5 to address remaining permit requirements.

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

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

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

Solids, Oil and Grease (Hydrocarbons), or Metals

Annual Requirements

Good Housekeeping and Pollution Prevention for Permittee Owned Operations

- Increased street sweeping frequency of all municipal owned streets and parking lots to a schedule that targets areas with potential for high pollutant loads
 - The street sweeping schedule is attached to the email submission
 - The street sweeping schedule can be found at the following website:

Included as an appendix in the SWMP Plan, available for download at: <https://ceiengineers.com/amesbury-stormwater/>

- Prioritized inspection and maintenance for catch basins to ensure that no sump shall be more than 50 percent full; Cleaned catch basins more frequently if inspection and maintenance activities indicated excessive sediment or debris loadings

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

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

The City of Amesbury completed substantial work during Year 4 to address items required during Years 1 through 3 that were not previously completed. Work included the following:

Catchment Delineations and Outfall Classification/Ranking - The City completed initial catchment delineations for all 216 known outfalls. The City also completed an inventory and priority ranking of all 216 known outfalls, all of which were ranked as “High” as they are located in densely developed areas and in close proximity to sewer more than 40 years old. Outfalls were further prioritized based on other parameters as specified in the permit. Results are provided in an updated IDDE Plan.

Outfall Screening - Previous outfall screening included screening of approximately 196 outfalls out of 216. 20 remaining outfalls were screened during Year 4 and no sampling results indicated that discharges were highly likely to contain illicit discharges from sanitary sources. It is anticipated that additional screening will be completed during Year 5, as a number of outfalls have not been screened in over 5 years and/or could not be located or accessed.

Operation and Maintenance (O&M) Plan - The City completed a comprehensive O&M Plan that in part includes O&M procedures for municipal activities (parks and open space, buildings and facilities, vehicles and equipment) and stormwater infrastructure. The O&M Plan also includes a street sweeping plan, catch basin cleaning and inspections, and procedures for winter options and salt management.

Written Procedures for Site Inspections and Erosion/Sediment Control Enforcement - The City developed written procedures for site inspections and enforcement of erosion and sediment control measures at construction sites. Requirements were then incorporated into the City’s recently developed O&M Plan under the “Construction Management” section.

Inventory of Municipal Facilities - The O&M Plan provide an inventory and map of known City-owned facilities. Municipally owned facilities were then comprehensively inspected during Year 4 to identify potential BMP retrofit opportunities.

BMP Inspection and Maintenance - The City developed an inventory and map of known City-owned structural stormwater BMPs, as well as general inspection and maintenance procedures in the O&M Plan under the “Municipal Infrastructure” section subsection “BMP Inspection and Maintenance”. 31 BMPs were then inspected in spring 2022

SWPPP and IDDE Training - Training on IDDE program and SWPPP implementation was provided to relevant staff on December 15, 2021.

SWMP Plan and IDDE Plan Updates - The above items were included in an updated SWMP Plan and IDDE Plan, completed on December 31, 2021.

SWPPPs - The City previously completed a SWPPP for its DPW Facility located at 39 South Hunt Road and meets all permit requirements for this facility. The SWPPP also addresses a satellite storage facility at 56 South Hunt Road that is used for storage of catch basin cleanings, street sweepings, and winter snow dumping,

however, does not adequately address pollutant sources and stormwater controls at the satellite storage area. The SWPPP document will be updated in Year 5 to address remaining permit requirements.

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: Elementary School Program - Keeping Water Clean

Message Description and Distribution Method:

Program engages 5th grade students in several activities designed to raise their stormwater and water conservation awareness. Students learn about what a watershed is, what stormwater, groundwater and wastewater are, how they can negatively or positively impact these water systems, along with more details about each system and how it should be protected/maintained.

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

2166 students
370 teachers and parents
30 schools

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: Video - "Fowl Water"

Message Description and Distribution Method:

The Think Blue Massachusetts "Fowl Water" video defines stormwater and explains the impact that pollution like trash, oil, cigarettes and dog poop can have on stormwater and our waterways. Video available at <https://www.thinkbluemassachusetts.org/>, www.greenscapes.org/resources-videos/ and spread as an advertisement on Facebook, Instagram, & YouTube

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

237,249 impressions on Facebook/Instagram
351,249 impressions on YouTube

Message Date(s): May 31, 2022 - June 17th, 2022

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: Workshop - Planning Tools to Promote Natural Resource Stewardship

Message Description and Distribution Method:

Hosted by members of the PIE-Rivers Partnership, this free virtual workshop discussed the latest trends in promoting LID and other forms of Green Infrastructure in North Shore communities.

Targeted Audience: Residents +

Responsible Department/Parties: PIE Rivers Partnership, Greenscapes Coalition

Measurable Goal(s):

82 Participants

Message Date(s): November 9, 2021

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: Print Material/Rack Card - Storm Drain Info

Message Description and Distribution Method:

The Greenscapes storm drain rack card, originally printed in 2016 was modified for easy office printing and distribution. The original can be found here: <https://greenscapes.org/wp-content/uploads/2017/01/Greenscapes-Rack-Card-2014-final.pdf>

Targeted Audience: Residents +

Responsible Department/Parties: Greenscapes Coalition, Municipal Staff

Measurable Goal(s):

Message Date(s): Sent to Greenscapes network January 24th, 2022

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: Public Lecture - Coastal Communities Talk Water

Message Description and Distribution Method:

This free community event at the Cabot Theater in Beverly MA, featured guest speakers from Salem Sound Coastwatch, the Ipswich River Watershed Association, Green Beverly, Sustainable Marblehead and the EPA, who covered various topics related to water quality, water quantity and general watershed stewardship. Printed materials were also being passed out by Greenscapes personnel.

Targeted Audience: Residents +

Responsible Department/Parties: Greenscapes Coalition

Measurable Goal(s):

150 Attendees

Message Date(s): March 10th, 2022

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: Printed Material (Magazine) - Greenscapes Guide

Message Description and Distribution Method:

The Greenscapes Guide, a 26 page magazine that covers sustainable landscaping tips, DIY stormwater management for homeowners and more, was distributed at every school program that Greenscapes conducted this school year.

Targeted Audience: Residents +

Responsible Department/Parties: Greenscapes Coalition

Measurable Goal(s):

3,000 guides distributed throughout the North Shore

Message Date(s): Various dates between September 2021 - June 2022

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: In-Person Exhibit - Culture House

Message Description and Distribution Method:

Salem Sound Coastwatch, a contributing partner to the Greenscapes Coalition, was a resident exhibitor at Salem Culture House, a pilot project that created a community space in Salem's Old Town Hall. At the exhibit, SSCW staff ran two hands on activities that taught visitors about their connection to their watershed. Greenscapes materials were on display and passed out.

Targeted Audience: Residents +

Responsible Department/Parties: Greenscapes Coalition, Municipal Staff

Measurable Goal(s):

924 Attendees

Message Date(s): April 20th - April 23rd, 2022

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: Miscellaneous Social Media

Message Description and Distribution Method:

Social media content related to stormwater management, wastewater and groundwater protection, water conservation, pet waste, septic system maintenance and sustainable lawn care are always available on the Greenscapes social media pages and on the Greenscapes website. <https://greenscapes.org/resources-socialmedia/>

Targeted Audience: Residents +

Responsible Department/Parties: Greenscapes Coalition

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: Miscellaneous Tabling Events

Message Description and Distribution Method:

Events attended by Greenscapes personnel where printed materials were passed out: Middleton Earth Day, Tri-Town Spring Expo, Boxford Applefest, Topsfield Strawberry Fest, Ipswich STEAM Showcase, Beverly Earth Day, Salem Farmer's Market, Earth Week at the Peabody Essex Museum

Targeted Audience: Residents +

Responsible Department/Parties: Greenscapes Coalition

Measurable Goal(s):

Message Date(s): Various dates between September 2021 - June 2022

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:

Add an Educational Message

MCM2: Public Participation

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

SWMP Plan for Download - The Town has posted the SWMP Plan and other relevant information on Town website along with contact information to allow for public comment.

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 city is a member of the Merrimack Valley Stormwater Collaborative which is a coalition of 15 MVPC communities working together on regional approaches to cost-effective stormwater management. The Collaborative is focused on intermunicipal coordination in training, public education and best management practices implementation, all key elements in each community’s Stormwater Management Program and compliance with federal Environmental Protection Agency’s NPDES Phase II regulations and the MS4 Permit for Massachusetts. (Website: www.merrimackvalleystormwater.org)

The city is also a member of the Greenscapes North Shore Coalition which is a collaborative of municipalities and partner organizations, focusing on stormwater and watershed related issues. Specifically, Greenscapes provides outreach and education to support municipal compliance with water-related regulatory requirements, including the MS4 Stormwater and the Water Management Act permits. (Website: www.greenscapes.org)

The Amesbury DPW periodically meets with other departments and boards such as the Conservation Commission, Planning Board, etc. to discuss stormwater topics. Discussions include current and future construction projects within the city, as well as operations and maintenance of the MS4.

The Amesbury Lakes and Waterways Commission also conducts monthly meetings to discuss lake related issues such as stormwater impacts. These meetings are open to interested members of the public. The Lakes and Waterways Commission coordinates lake cleanup efforts such as trash removal, elimination of invasive species, etc. as funds are available. The commission also actively pursues funding opportunities for lake cleanup efforts.

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

Optional: Provide additional status information regarding your map:

The City has identified a number of data gaps in its drainage mapping (e.g., catch basins without piping, disconnected drainage networks, etc.) and has begun investigating these through field efforts. Any new outfalls/interconnections discovered through this process will be mapped and screened for dry weather flow.

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 outfall screening data is attached to the email submission
- The outfall screening data can be found at the following website:

*Below, report on the number of outfalls/interconnections screened **during this reporting period.***

Number of outfalls screened:

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

Percent of outfalls screened:

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

Previous outfall screening included screening of approximately 196 outfalls out of 216. 20 remaining structures were screened during Year 4, of which 15 were determined to be outfalls and 1 of which was flowing. No sampling results indicated likely input from sanitary sources. It is anticipated that additional screening will be completed during Year 5, as a number of outfalls have not been screened in over 5 years and/or could not be located or accessed.

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 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:

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 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:

Employee Training

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

Training on IDDE program and SWPPP implementation was provided to relevant staff on December 15, 2021.

*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

Ordinance or Regulatory Mechanism

Date update was completed (due in year 3):

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:

Stormwater Regulations - The City's current stormwater regulations partially meet permit requirements, addressing the majority of construction-related requirements. However, post-construction requirements are not fully addressed. The City has retained a consultant to assist with this work during Year 5.

Retrofit Properties Inventory

Below, list the permittee-owned properties that could be modified or retrofitted with BMPs to mitigate impervious areas (at least 5):

- Amesbury Elementary School - Construct BMP along roadside and redirect existing drainage networks from school and from S Hampton Road to proposed BMP, treating runoff before discharging to existing outfall area.

Department of Public Works - Improve existing ditch and redirect existing catch basins in DPW parking lot to proposed BMP. Further evaluation of existing DPW drainage structures required to determine existing connections and the potential to treat runoff from back lot as well.

Amesbury Innovation High School - Construct BMP in open grassed area and install catch basins throughout school parking lot to capture and treat runoff. Potential to install additional catch basin on Allens Court and capture some runoff from the street.

Amesbury Public Library - Construct a small BMP in the side yard of the library and redirect library roof leader. Install catch basin(s) north of building to capture runoff from municipal parking and direct to rain garden as well.

Affordable Housing Community - Construct long, narrow BMP along edge of parking lot and install a new catch basin uphill to capture and treat the majority of runoff from driveway and parking area. Install additional catch basin(s) along southern edge of parking area and extend apartment roof drains to capture and treat roof runoff.

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:

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:

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 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

Optional: 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:

COVID-19 Impacts

Optional: If any of the above year 4 requirements could not be completed due to the impacts of COVID-19, please identify the requirement that could not be completed, any actions taken to attempt to complete the requirement, and reason the requirement could not be completed below:

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 5 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 5 below:

Stormwater Regulations - The City's current stormwater regulations partially meet permit requirements, addressing the majority of construction-related requirements. However, post-construction requirements are not fully addressed. The City has retained a consultant to assist with this work during Year 5.

Outfall Screening - Previous outfall screening included screening of approximately 196 outfalls out of 216. 20 remaining outfalls were screened during Year 4 and no sampling results indicated that sewer input indicators were highly likely to contain illicit discharges from sanitary sources. It is anticipated that additional screening will be completed during Year 5, as a number of outfalls have not been screened in over 5 years and/or could not be located or accessed.

SWPPPs - The City previously completed a SWPPP for its DPW Facility located at 39 South Hunt Road and meets all permit requirements for this facility. The SWPPP also addresses a satellite storage facility at 56 South Hunt Road that is used for storage of catch basin cleanings, street sweepings, and winter snow dumping, however, does not adequately address pollutant sources and stormwater controls at the satellite storage area. The SWPPP document will be updated in Year 5 to address remaining permit requirements.

Part V: Certification of Small MS4 Annual Report 2021

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]