

Year 5 Annual Report
Massachusetts Small MS4 General Permit
Reporting Period: July 1, 2022-June 30, 2023

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, 2022 and June 30, 2023 unless otherwise requested.

Part I: Contact Information

Name of Municipality or Organization: Avon

EPA NPDES Permit Number: MAR041089

Primary MS4 Program Manager Contact Information

Name: William Fitzgerald Title: DPW Director

Street Address Line 1: 65 East Main Street

Street Address Line 2:

City: Avon State: MA Zip Code: 02332

Email: wfitzgerald@avon-ma.gov Phone Number: (508) 588-0414

Stormwater Management Program (SWMP) Information

SWMP Location (publicly available web address): <https://www.avon-ma.gov/stormwater-dpw>

Date SWMP was Last Updated: June 2019

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

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 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:

IDDE Training - Training was not performed during this permit year.

SWPPPs - Two SWPPPs for the DPW Facility and Transfer Station were not in place at the end of Year 5, however were finalized in September 2022. SWPPPs are currently being implemented.

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 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:

The Town is a member of the Neponset River Watershed Association which distributed a number of public education messages throughout the year. Targeted messages addresses topics related to pet waste collection, septic system maintenance, and other general stormwater maintenance. The Town's dedicated stormwater website <https://www.avon-ma.gov/stormwater-dpw> has a number of fact sheets available for download, including brochures related to septic system maintenance, dog waste clean-up, and other general stormwater information. The Town also distributed a fact sheet with a dog license registration renewals.

Nitrogen (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) that encourages the proper use and disposal of grass clippings and encourages the proper use of slow-release fertilizers
- Distributed an annual message in the summer (June/July) encouraging the proper management of pet waste, including noting any existing ordinances where appropriate

- Distributed an annual message in the fall (August/September/October) encouraging the proper disposal of leaf litter

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

Good Housekeeping and Pollution Prevention for Permittee Owned Operations

- Increased street sweeping frequency of all municipal owned streets and parking lots subject to Permit part 2.3.7.a.iii.(c) to a minimum of two times per year (spring and fall)

Structural BMPs

- Completed the evaluation of all permittee owned properties identified as presenting retrofit opportunities or areas for structural BMP installation under permit part 2.3.6.d or identified in the Nitrogen Source Identification Report, including: *(select the items of the evaluation that have been completed below)*

- Next planned infrastructure, resurfacing, or redevelopment activity planned for the property (if applicable) OR planned retrofit date
- Estimated cost of redevelopment or retrofit BMPs
- Engineering and regulatory feasibility of redevelopment or retrofit BMPs

- Completed a listing of planned structural BMPs and a plan and schedule for implementation
 - The BMP list and implementation schedule is attached to the email submission
 - The BMP list and implementation schedule can be found at the following publicly available website:

Any structural BMPs listed in Table 3 of Attachment 1 to Appendix F already existing or installed in the regulated area by the permittee or its agents was tracked and the nitrogen removal by the BMP was

- estimated consistent with Attachment 1 to Appendix F. The BMP type, total area treated by the BMP, the design storage volume of the BMP, and the estimated nitrogen removed in mass per year by the BMP were documented.
 - No BMPs were installed
 - The above referenced BMP information is attached to the email submission
 - The above referenced BMP information can be found at the following publicly available website:

Total estimated nitrogen removed in lbs/year from the installed BMPs:

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:

Public Education and Outreach - The Town is a member of the Neponset River Watershed Association which distributed a number of public education messages throughout the year. Targeted messages addressed topics related to pet waste collection, yard maintenance, and other general stormwater maintenance. The Town's dedicated stormwater website <https://www.avon-ma.gov/stormwater-dpw> has a number of fact sheets available for download, including brochures related to dog waste clean-up, lawn and garden maintenance, and

other general stormwater information. The Town also distributed a fact sheet with dog license registrations/renewals.

Street Sweeping - All roads were swept once during Permit Year 5, and select priority roads were also swept a second time.

Nitrogen Source Identification Report - Trout Brook Watershed Study - The Town completed a comprehensive investigation of its stormwater infrastructure within the Trout Brook watershed, a water body impaired for bacteria. Trout Brook discharges to the Matfield River which is impaired for bacteria and total phosphorus, which then eventually discharges to Mount Hope Bay which is impaired for bacteria and total nitrogen. Avon considers Trout Brook to be its priority waterbody for improving water quality, in part because more than 65% of the Town's drinking water supply is drawn from the Trout Brook aquifer. As part of this study, the Town inspected 21 outfalls within the watershed out of a total of 43 known outfalls for dry weather flows that could be indicative of an illicit discharge. Of the 21 outfalls, only 1 was flowing and did not meet EPA's requirements for an illicit discharge due to likely sewer input. 5 outfalls were also inspected during wet weather. Town has actively been pursuing grants such as a 604b and s.319 to fund design, permitting, and construction of drainage improvements. One project completed to date is a comprehensive rehabilitation of the Town Hall to include various public demonstration BMPs, including a gravel wetland, rain garden, tree box, swale, and drywells, etc. The Town is looking to install expanded signage to explain the function of various BMPs to interested members of the public.

Phosphorus (Combination of Impaired Waters Requirements and TMDL Requirements as Applicable)

Annual Requirements

*Public Education and Outreach**

- Distributed an annual message in the spring (April/May) encouraging the proper use and disposal of grass clippings and encouraging the proper use of slow-release and phosphorus-free fertilizers
- Distributed an annual message in the summer (June/July) encouraging the proper management of pet waste, including noting any existing ordinances where appropriate
- Distributed an annual message in the fall (August/September/October) encouraging the proper disposal of leaf litter

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

Good Housekeeping and Pollution Prevention for Permittee Owned Operations

- Increased street sweeping frequency of all municipal owned streets and parking lots subject to Permit part 2.3.7.a.iii.(c) to a minimum of two times per year (spring and fall)

Structural BMPs

- Completed the evaluation of all permittee owned properties identified as presenting retrofit opportunities or areas for structural BMP installation under permit part 2.3.6.d or identified in the Phosphorus Source Identification Report, including: *(select the items of the evaluation that have been completed below)*
 - Next planned infrastructure, resurfacing, or redevelopment activity planned for the property (if applicable) OR planned retrofit date
 - Estimated cost of redevelopment or retrofit BMPs
 - Engineering and regulatory feasibility of redevelopment or retrofit BMPs

- Completed a listing of planned structural BMPs and a plan and schedule for implementation
 - The BMP list and implementation schedule is attached to the email submission
 - The BMP list and implementation schedule can be found at the following publicly available website:

- Any structural BMPs already existing or installed in the regulated area by the permittee or its agents was tracked and the phosphorus removal by the BMP was estimated consistent with Attachment 3 to Appendix F. The BMP type, total area treated by the BMP, the design storage volume of the BMP, and the estimated phosphorus removed in mass per year by the BMP were documented.
- No BMPs were installed
 - The above referenced BMP information is attached to the email submission
 - The above referenced BMP information can be found at the following publicly available website:

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

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:

Public Education and Outreach - The Town is a member of the Neponset River Watershed Association which distributed a number of public education messages throughout the year. Targeted messages addressed topics related to pet waste collection, yard maintenance, and other general stormwater maintenance. The Town's dedicated stormwater website <https://www.avon-ma.gov/stormwater-dpw> has a number of fact sheets available for download, including brochures related to dog waste clean-up, lawn and garden maintenance, and other general stormwater information. The Town also distributed a fact sheet with dog license registrations/renewals.

Street Sweeping - All roads were swept once during Permit Year 3, and select priority roads were also swept a second time.

Phosphorus Source Identification Report - Trout Brook Watershed Study - The Town completed a comprehensive investigation of its stormwater infrastructure within the Trout Brook watershed, a water body impaired for bacteria. Trout Brook discharges to the Matfield River which is impaired for bacteria and total phosphorus, which then eventually discharges to Mount Hope Bay which is impaired for bacteria and total nitrogen. Avon considers Trout Brook to be its priority waterbody for improving water quality, in part because more than 65% of the Town's drinking water supply is drawn from the Trout Brook aquifer. As part of this study, the Town inspected 21 outfalls within the watershed out of a total of 43 known outfalls for dry weather flows that could be indicative of an illicit discharge. Of the 21 outfalls, only 1 was flowing and did not meet EPA's requirements for an illicit discharge due to likely sewer input. 5 outfalls were also inspected during wet weather. Town has actively been pursuing grants such as a 604b and s.319 to fund design, permitting, and construction of drainage improvements. One project completed to date is a comprehensive rehabilitation of the Town Hall to include various public demonstration BMPs, including a gravel wetland, rain garden, tree box, swale, and drywells, etc. The Town is looking to install expanded signage to explain the function of various BMPs to interested members of the public.

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:

The Town has determined it is subject to the following additional TMDL and Impaired Waters requirements:

- Mount Hope Bay (MA61-06), bacteria water quality impairments requirements (Appendix H, Part III)
- Trout Brook (MA62-07), bacteria water quality impairments requirements (Appendix H, Part III)
- Trout Brook (MA62-07), turbidity/TSS water quality impairments have been removed

Part IV: Minimum Control Measures

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

MCM1: Public Education

Number of educational messages completed during this reporting period:

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

BMP: Stormwater Hotline

Message Description and Distribution Method:

The Neponset River Watershed Association has developed a stormwater hotline to allow residents within the watershed to call about stormwater-related items

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

Make a stormwater hotline available to Avon residents

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:

The Town has opted to partner with the Neponset River Watershed Association to broaden its public education reach

BMP:Stormwater Website

Message Description and Distribution Method:

The Town's dedicated stormwater website <https://www.avon-ma.gov/stormwater-dpw> has a number of fact sheets available for download, including brochures related to septic system maintenance, dog waste clean-up, use of erosion controls during construction, lawn and garden maintenance, and other general stormwater information.

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

Distribute a minimum of two (2) educational messages spaced at least a year apart by Permit Year 5 (June 30,

2023) as well as any that may be required by Appendices F and H

Message Date(s): Ongoing / Continuous

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: Pet Waste Brochure Distribution

Message Description and Distribution Method:
Distribute a fact sheet with dog license registrations/renewals.

Targeted Audience: Residents

Responsible Department/Parties: Town Clerk, Public Works

Measurable Goal(s):
Distribute fact sheets on dog waste cleanup with all dog license registrations and renewals

Message Date(s): Ongoing

Message Completed for: Appendix F Requirements Appendix H Requirements

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

If yes, describe why the change was made:
To comply with TMDL and impaired waters requirements

BMP: School Education Program

Message Description and Distribution Method:
The Neponset River Watershed Association has been presenting a Water Education Program that covers materials that are in the current MA State Educational Frameworks for 5th grade, under “Earth’s Systems” and “Earth and Human Activity”. In addition, the program addressed local water resources (groundwater, surface water), water infrastructure (wells, pumps, tanks, pipes), water usage, methods of conservation, storm drains, runoff, septic, and sewer.

The complete program requires two visits per class, for one hour each time, and multiple classes can be visited in one day.

Targeted Audience: Residents (students)

Responsible Department/Parties: Neponset River Watershed Association

Measurable Goal(s):

Provide a public education program, consisting of two separate one-hour courses annually.

Message Date(s): Varies, annual course provided

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 made the SWMP Plan publicly available 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:**

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 Town has completed a comprehensive mapping program over the past several years during which receiving waterbodies and impairments, outfalls, catch basins, manholes, stormwater BMPs, and pipe interconnectivity were mapped in GIS. Initial catchment delineations have also been completed based on topographic mapping and available stormwater system information. Completion of these items has put the the Town largely in compliance with the Phase II requirements which are not due until Year 10. Mapping of open channel conveyances and interconnections with other MS4s (e.g. DOT) is ongoing, and it is expected that this will continue as part of DOT's own mapping efforts to be completed under a future TS4 permit.

Screening of Outfalls/Interconnections

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

- No outfalls were inspected
- The above referenced outfall screening data is attached to the email submission
- The above referenced outfall screening data can be found at the following publicly available website:

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

Number of outfalls screened:

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:

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:

Employee Training

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

Training was not performed during this permit year.

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: 0

Number of inspections completed: 0

Number of enforcement actions taken: 0

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): Bylaw: June 29, 2020
Regulations: November 5, 2020

Website of ordinance or regulatory mechanism: Bylaw: Chapter 120. <https://ecode360.com/37523681>

As-built Drawings

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

Number of as-built drawings received: 0

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

Street Design and Parking Lots Report

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

No changes have been made to date. To be determined pending discussions between various departments. Estimated June 30, 2027.

Green Infrastructure Report

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

No changes have been made to date. To be determined pending discussions between various departments. Estimated June 30, 2027.

Retrofit Properties Inventory

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

Town Hall (completed) - Gravel wetland, rain garden, tree box, swale, and drywells

Grant Drive and Stockwell Drive - Bioretention and subsurface infiltration

South Street - Subsurface infiltration and grassed sand filter

Wales Avenue and Bodwell Street - Bioretention and grassed sand filter

North Main Street - Subsurface infiltration and subsurface sand filter

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. 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.

No properties have been modified or retrofitted to BMPs to date.

[Empty text box]

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: [Select Units]

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:

[Empty text box for reporting actions]

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: [Select Units]

Weight of material removed: [Select Units]

Stormwater Pollution Prevention Plan (SWPPP)

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

Number of site inspections completed:

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

Two SWPPPs for the DPW Facility and Transfer Station were not in place at the end of Year 4, however, were finalized in September 2022. SWPPPs are currently being implemented. Site inspections will be completed quarterly with corrective actions taken as needed.

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

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. If any of the above year 5 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 6 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 6 below:

Part V: Certification of Small MS4 Annual Report 2023

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]