

**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:

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.

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:

The Town has scheduled winter operations training with the full DPW staff for October 2023 and good housekeeping/pollution prevention, and IDDE training scheduled for September 19th, 2023.

### **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:

2,843 messages regarding pet waste management were distributed via Viewpoint Cloud. An additional 100 septic educational flyers were distributed at the Health Department and DPW.

### **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 publicly available website:

<https://www.franklinma.gov/highwaygrounds-division/pages/street-sweeping>

- 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:

The electronic tracking of inspection and maintenance work continues to be utilized to identify catch basins at >50% capacity. These catch basins are targeted for more frequent inspections and maintenance.

Main roads in Franklin were swept as much as possible during "leaf season", and the downtown area was swept biweekly between Memorial Day and Labor Day, weekly during autumn months, and monthly during all other months. All roads were swept in accordance with Appendix H.V.2.a.ii a minimum of two times this permit year.

**Charles River Watershed Phosphorus TMDL**

- Completed the written Phase 1 Phosphorus Control Plan (PCP), including: *(select the items in the Phase 1 PCP that have been completed)*
  - Planned nonstructural controls
  - Planned structural controls
  - O&M program for structural controls
  - Implementation schedule
  - Cost of implementation

The Phase 1 PCP: *(select one of the following options)*

- is attached to the email submission
- can be found at the following publicly available website:

*Below, calculate your current phosphorus export rate by first filling out the individual phosphorus loading components (labeled [A], [B], [C], and [D]) and then computing your current phosphorus export rate using the equation provided.*

Baseline phosphorus export reduction required from PCP Area, as identified in Appendix F **(lbs/year) [A]:**

- Documented the nonstructural control measures implemented during **this reporting period** and their phosphorus reduction

total phosphorus reduction from all nonstructural controls this reporting period **(lbs/year) [B]:**

- No nonstructural control measures were implemented
- The above referenced nonstructural control measures information is attached to the email submission
- The above referenced nonstructural control measures information can be found at the following publicly available website:

Documented the structural control measures implemented during **this reporting period and all previous years**, including location, phosphorus reduction in mass/year, and date of last completed maintenance and inspection for each control

total phosphorus reduction from all structural controls installed this reporting period and all previous years **(lbs/year) [C]:**

- No structural control measures were implemented
- The structural control measures information is attached to the email submission
- The structural control measures information can be found at the following publicly available website:

Phosphorus load increase due to development incurred since 2005 in **lbs/year [D]:**

Current phosphorus export rate from the PCP Area in **lbs/year [=A-(B+C)+D from above]:**

I certify under penalty of law that all source control and treatment Best Management Practices being claimed for phosphorus reduction credit have been inspected, maintained and repaired in accordance with manufacturer or design specification. I certify that, to the best of my knowledge, all Best Management Practices being claimed for a phosphorus reduction credit are performing as originally designed.

All municipally owned and maintained turf grass areas are being managed in accordance with Massachusetts Regulation 331 CMR 31 pertaining to proper use of fertilizers on turf grasses

*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 total phosphorus reduction from existing structural controls (provided above as letter C) is based on the assumption that all municipal and private stormwater control measures are being inspected and maintained adequately and are performing as designed. Prior to the Permit Year 8 deadline, Franklin and Woodard & Curran (W&C) will advance the municipal operation and maintenance program as outlined in the PCP and work with private property owners to obtain annual inspection and maintenance reports.

During Permit Year 6, W&C anticipates updating the phosphorus load increase due to development incurred since 2005 (provided as letter D) using recently available UVM/CRWA 2021 LULC data. Additionally, W&C plans to refine the total phosphorus reduction from existing structural controls (provided as letter C) by evaluating their reduction using the EPA's BMP-BATT calculator.

Franklin will meet the phosphorus load reduction requirement through structural control measure retrofits and design of new structural control measures. W&C will update the Phosphorus Control Plan annually to account for the new total phosphorus reductions based on structural and non-structural control measures.

Franklin and W&C will review the reissued MS4 General Permit once it becomes available and revise the PCP should credit policies change, specifically the non-structural street sweeping policy. Lastly, W&C will evaluate the potential affects of the RDA designations on municipal total phosphorus reduction requirements.

***NON-TRADITIONAL AND TRANSPORTATION MS4s ONLY-*** municipalities please skip this section:

Describe the planned phosphorus reduction activities on site and coordination progress with the applicable municipality:

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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:

The Town evaluated the "Draft Massachusetts Integrated List of Waters from the Clean Water Act 2022 Reporting Cycle" and noted no changes related to receiving waters/impaired or TMDL waters/outfalls have been made during this reporting period.

One unmapped outfall was identified during catchment investigation activities and added to the Town's outfall inventory.

## 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: 1A - Brochure for Residents**

Message Description and Distribution Method:

The Stormwater Division website, located on the DPW website, includes general educational information about stormwater pollution and the importance of keeping stormwater clean. The page contains various flyers and brochures. The following messages directed towards residents are available on the website: stormwater utility fee (implemented July 1, 2023), rain barrel program, general stormwater information mailer, pet waste flyer, and septic system care flyer. The stormwater utility fee information was posted in the April and June 2023 E-newsletter. The general stormwater mailer was also distributed to roughly 14,000 residents via USPS.

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: 1B - Displays for Businesses, Institutions, and Commercial Facilities**

Message Description and Distribution Method:

The Stormwater Division website and Town Hall contain flyers (and/or their links) geared towards Businesses and Institutions, Industrial Spill Prevention, Industrial Material Handling, and Industrial Fleet Management.

Flyers are available to the DBA license application in Viewpoint. 221 were distributed in Permit Year 5.

Targeted Audience:

Responsible Department/Parties: DPW Environmental Affairs and GIS Manager

Measurable Goal(s):

Update posters and displays with appropriate non-residential stormwater pollution control messages annually.

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: 1C - Brochures for Developers**

Message Description and Distribution Method:

Brochures/flyers educating construction developers about soil erosion controls were distributed with the on-line Soil Erosion and Sediment Control Plan permit application Viewpoint Cloud. 4 brochures were distributed in Permit Year 5.

Targeted Audience: Developers (construction)

Responsible Department/Parties: DPW Environmental Affairs and GIS Manager

Measurable Goal(s):

Preparation and distribution of stormwater messages targeting the development community.

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: 1D - Brochures for Industrial Facilities**

Message Description and Distribution Method:

The Stormwater Division website, located at the DPW website, includes general educational information about stormwater pollution and the importance of keeping stormwater clean. The page contains links to various flyers and brochures with messages directed toward industrial facilities regarding Industrial Spill Prevention, Industrial Material Handling, and Industrial Fleet Management flyers. Additionally, these brochures are available at the Town Hall/DPW, and 26 brochures were taken in Permit Year 5.

Targeted Audience: Industrial facilities

Responsible Department/Parties: DPW Operations

Measurable Goal(s):

Preparation and distribution of stormwater messages targeting operations.

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:

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**BMP: 1E - Website Updates for General Public**

Message Description and Distribution Method:

The Town's 2023 newsletter has 4,646 recipients and contained various seasonal educational messaging regarding the following:

- February 2023: Rain barrel program and stormwater utility fee implementation
- April 2023: Earth Day Extravaganza for Beaver Pond cleanup, rain barrel program, inspect impervious areas, and stormwater utility fee implementation
- June and July 2023: Stormwater utility fee implementation
- September 2023: Rain barrel program

The Town posts flyers, videos, and other educational information to their DPW Facebook, Twitter, and Instagram pages.

- Several dates: "Fall Rain Barrel Program" - Facebook, Instagram posts
- Several dates: "Great American Rain Barrel Ad" - Facebook, Twitter, Instagram posts
- Several dates: "Yard Waste/Leaf Disposal" - Facebook posts
- Several dates: Stormwater Credit Application - Facebook posts
- 11/10/2022: Salt Truck Calibration - Facebook posts

Targeted Audience: Residents

Responsible Department/Parties: DPW Operations

Measurable Goal(s):

Promote stormwater awareness by linking key stormwater information, regulations, and activity updates with a goal to increase website hits. The community Facebook page "All About Franklin" has 20k followers, the DPW Facebook page has 3.5k followers, the Town of Franklin Facebook page has 3k followers, the Town of Franklin Instagram page has 2.2k followers, the Town of Franklin Twitter account has 3.9k followers, and the Town newsletter is distributed to 4.6k community members.

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:

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:**

The Town of Franklin posted their MS4 General Permit Notice of Intent and Permit Year 2, 3, 4, and 5 SWMP updates to the Stormwater Division web page on the Town website. DPW contact information, including email and DPW address, were provided for public comment. No comments were received during this permit year.

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:**

Franklin hosted a stormwater booth at Franklin's touch-a-truck event on October 15, 2022 with 600+ residents. Franklin also hosted a Earth Day clean up on April 22, 2022 with 225 participants.

### 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:

BMP 3B Stormwater Sewer System Maps are provided in Appendix F and Appendix G of the PY5 SWMP.

**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:

As of Permit Year 5, 504 outfalls have been screened which accounts for 100 percent of all outfalls in Franklin.

**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 contracted with a sub-consultant to perform catchment investigations, which commenced in

September 2022. Catchments assigned the most elevated priority for investigation, per Permit Part 2.3.4.8.a, were prioritized for investigation. To date, investigations have occurred in 142 of the Town's catchments. Drainage infrastructure in these catchments has been completely or almost completely investigated. Catchment investigations will be marked "complete" upon an evaluation of the need for and implementation of wet weather sampling. Catchment investigation data is appended to the Permit Year 5 annual report. It is planned that the remaining catchments will be investigated in Permit Year 6 and 7.

**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:**

The Town has scheduled SPCC and SWPPP trainings containing IDDE components for DPW staff for September 19, 2023. Opportunistic trainings are provided throughout the year in the field and/or office during implementation of drainage infrastructure related work.

**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**

**Ordinance or Regulatory Mechanism**

Date update was completed (due in year 3):

Website of ordinance or regulatory mechanism:

**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:

**Street Design and Parking Lots Report**

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

The Town is currently working on the following recommendations:

Create a guidance document to supplement Zoning Bylaws and provide additional direction on and variation in design parameters for street, sidewalk, and parking lot design.

Create a guidance document to supplement Subdivision Bylaws to provide direction related to variation in design parameters for driveway and cul-de-sac design.

### **Green Infrastructure Report**

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

Create a guidance document to supplement Zoning Bylaws and provide additional direction on and variation in design parameters for street, sidewalk, and parking lot design.

Create a guidance document to supplement Subdivision Bylaws to provide direction related to variation in design parameters for driveway and cul-de-sac design.

Revise the Town's Best Development Practice Guidebook to include an urban forestry plan and reference methods for delineation and protection of the critical root zone of trees at sites.

### **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):

Dean Avenue Stormwater Improvement Project (2021)  
 Griffin Road Stormwater Improvement Project (2021)  
 Meadowlark Lane Stormwater Improvement Project (2021)  
 Greensfield Road (2012)  
 Wachusett Street (2011)  
 Panther Way (2009)

In addition to the permittee-owned properties listed, the Town proactively evaluates additional properties for future retrofit opportunities in conjunction with capital improvement planning and Phosphorus Control Plan development and is in the process of refining their list of potential projects to jointly meet impervious area reduction and phosphorus removal goals.

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.

The Town has identified municipally owned BMPs and privately owned BMPs for retrofits as part of Phosphorus Control Planning. Retrofits will be advanced and reported in upcoming years.

### 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:

A catch basin SOP was adopted in 2020, resulting in electronic tracking of maintenance work and scheduling of catch basins identified to be at 50% capacity that will require more frequent maintenance and inspections. The enhanced maintenance cycle started in Fall 2020.

If necessary, schedule adjustments will be made to prioritize catch basins located at known problem areas (low spots, etc.) and near construction activities. If inspection and maintenance activities indicate excessive sediment and debris loading (sump is more than 50% full during two consecutive routine inspections/cleanings), these catch basins will be cleaned more frequently.

In addition, during this permit year (as in PY4) the Town subcontracted a subset of catch basin cleaning operations to more fully target drainage infrastructure maintenance, resulting in an overall net increase of catch basins inspected and cleaned during this period. The Town expects to continue to subcontract catch basin cleanings to target cleaning all municipally owned catch basins at least once every two years, regardless of sump capacity.

**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:

Corrective actions included pushing mulch and stone material back within the confines of the bin/container and increased frequency of sweeping residual salt after snow events.

**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:

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## 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]*