

**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

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:

### **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:

Public Education - Information related to pet waste and septic system maintenance is available continuously on the Town's website.

### **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 - Information related to fertilizer usage, lawn care, pet waste, and leaf litter disposal is available continuously on the Town's website

**Lake and Pond Phosphorus TMDL**

- Completed the written Phase 1 Lake Phosphorus Control Plan (LPCP), including: *(select the items in the Phase 1 LPCP that have been completed)*
  - Planned nonstructural controls

- Planned structural controls
- O&M program for structural controls
- Implementation schedule
- Cost of implementation

The Phase 1 LPCP: *(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 LPCP Area **(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 nonstructural control measures information is attached to the email submission
- The 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 weight/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 baseline loading was calculated in **lbs/year [D]:**

Current phosphorus export rate from the LPCP 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 31.00 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 Town has not yet calculated increases in phosphorous load due to development since the baseline loading was calculated. The Town will update loading pending availability of updated land use data from publicly available sources that can be readily compared with previously released data.

Stormwater BMPs being claimed for phosphorous reduction credit have been evaluated in the field and/or through analysis of available design plans. Pollutant removals for BMPs with available plans have been assessed according to the provided engineering design plans to estimate pollutant reductions provided. BMPs with no available plans were instead assessed in the field according to best engineering judgment. The Town cannot certify that BMPs assessed in the field are performing as originally designed, as design plans are not available. However, we feel that reasonable steps have been made to accurately quantify pollutant removals provided by existing stormwater BMPs. Additionally, the Town continues to follow its Operation and Maintenance Plan which includes annual inspections of Town-owned BMPs, with maintenance performed as needed such that they maintain proper working order consistent with state and federal stormwater guidance.

*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:  
-Connecticut River (e.coli), bacteria TMDL requirements (Appendix F, Part A.III)

## 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: Video, ThinkBlue Massachusetts "Fowl Water"**

Message Description and Distribution Method:

ThinkBlue Massachusetts "Fowl Water" video (<https://www.thinkbluemassachusetts.org/>) Advertisement on Facebook, Instagram, & YouTube.

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

Results of the statewide ThinkBlue campaign were not available prior to submitting this annual report.

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: Stormwater Website**

Message Description and Distribution Method:

Develop a town stormwater website with a links to external sites such as EPA and MassDEP, as well as provide stormwater brochures for download.

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

Create a website and complete periodic updates.

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 Brochures**

Message Description and Distribution Method:

Distribute fact sheets or brochures on pet waste pickup with dog licenses

Targeted Audience: Residents

Responsible Department/Parties: Town Clerk

Measurable Goal(s):

Provide information with all applications and renewals

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:Seasonal Messages - Website**

Message Description and Distribution Method:

Post seasonal messages on fertilizer application methods, pet waste cleanup, septic system maintenance, and leaf litter removal on the town stormwater website for download. All flyers were also posted the Town website as well as on Hadley Media Community Bulletin Board and FaceBook page.

Targeted Audience: Residents, Businesses, institutions and commercial

Responsible Department/Parties: Department of Public Works

Measurable Goal(s):

Make seasonal messages available on the website for use by target audience members.

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:Seasonal Messages - Public Places**

Message Description and Distribution Method:

Make seasonal messages on fertilizer application methods, pet waste cleanup, septic system maintenance, and leaf litter removal available at multiple public locations for collection. All flyers were also posted the Town website as well as on Hadley Media Community Bulletin Board and FaceBook page.

Targeted Audience: Residents, Businesses, institutions and commercial

Responsible Department/Parties: Department of Public Works

Measurable Goal(s):

08/05/2022 - Summer message, ThinkBlue Pet Waste. 20 copies left at the Town Hall, 12 collected.  
 08/05/2022 - Summer message, ThinkBlue Pet Waste. 20 copies left at the Library, 8 collected.  
 08/05/2022 - Summer message, ThinkBlue Pet Waste. 15 copies left at the Council on Aging, 10 collected.  
  
 10/06/2022 - Fall message, Leaf Brochure. 25 copies left at the Town Hall, 9 collected.  
 10/06/2022 - Fall message, Leaf Brochure. 30 copies left at the Library, 22 collected.  
 10/06/2022 - Fall message, Leaf Brochure. 15 copies left at the Council on Aging, 8 collected.  
  
 03/28/2022 - Spring message, Fertilizer and Lawn Care. 20 copies left at the Town Hall, 12 collected.  
 03/28/2022 - Spring message, Fertilizer and Lawn Care. 20 copies left at the Library, 9 collected.  
 03/28/2022 - Spring message, Fertilizer and Lawn Care. 15 copies left at the Council on Aging, 10 collected.  
  
 06/07/2022 - Spring message, Leaf Brochure. 15 copies left at the Town Hall, 8 collected.  
 06/07/2022 - Spring message, Leaf Brochure. 15 copies left at the Library, 9 collected.  
 06/07/2022 - Spring message, Leaf Brochure. 15 copies left at the Council on Aging, 6 collected  
  
 07/12/2023 - Summer message, ThinkBlue Pet Waste. 20 copies left at the Town Hall, 11 collected.  
 07/12/2023 - Summer message, ThinkBlue Pet Waste. 20 copies left at the Library, 12 collected.  
 07/12/2023 - Summer message, ThinkBlue Pet Waste. 15 copies left at the Council on Aging, 8 collected.

Note, summer seasonal message materials provided on July 12, 2023 are intended to count towards Year 5 requirements.

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:

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:**

### 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:

All known outfalls, catch basins, manholes, and receiving waterbodies with impairments have been mapped to

date. Initial catchment delineations have also been completed based on topographic mapping and available stormwater system information. Mapping of open channel conveyances and any newly located outfalls is ongoing. Mapping 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.

The Town 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 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:*

Outfalls were screened during previous permit years; no additional outfalls were screened during Year 5. As/if additional outfalls are located, they are screened during dry weather for potential illicit discharges.

### **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 is assessing catchment investigation status during Year 6. Many catchments do not have Key Junction Manholes and/or System Vulnerability Factors; and thus inspections are complete as outfalls have been screened during dry weather.

**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:**

An on-site IDDE training session was held on May 11, 2023 with applicable DPW staff. This session also provided training on Stormwater Pollution Prevention Plan (SWPPP) implementation and inspections at the DPW Garage.

### 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:

10/18/2022: 401 Russell Street  
01/03/2023: 13 Russell Street

### 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:

No changes 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 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):

Hadley Elementary School - Recommend the installation of two small infiltration basins in the northwestern corner of the site. This basins would be in place of two catch basins within grassy areas, using the existing catch basins as outlets. Also recommend the installation of a large constructed wetland west of the parking lot to treat the majority of runoff collected by the drainage system. Recommend verifying the drainage connectivity of the manhole near the southern entrance.

Hopkins Academy, Secondary Building - Recommend the installation of an infiltration basin with sediment forebay that intercepts an existing drainage pipe that runs from Russell Street to an outfall in the southern portion of S1. This basin would contain an outlet structure that would tie into an existing catch basin in the Hopkins Academy parking area.

West Street Right-of-Way at Bay Road - Recommend the installation of a large infiltration basin to intercept two drainage lines before they combine and outfall at Outfall A-15. It's recommended that the existing manhole be retrofitted to serve as the outlet control structure.

Hadley Department of Public Works - Limited space is available at the site. Recommend replacing the existing catch basin with a manhole, allowing for continued access. The installation of two new catch basins and a proprietary underground sediment separation system that ties into the retrofitted manhole. Separator should include oil/water separator.

Hadley Housing Authority - Recommend the installation of an underground proprietary sediment trap/

separator at the end of Golden Court to intercept stormwater flow before it ties into the drainage on Middle Street. It is also recommended that the drainage and sewer manholes at the end of Golden Court be inspected for possible connections.

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 with BMPs to date.

### 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 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:

*Carolyn Brennan*

Title:

*Town Administrator*

Signature:

*Carolyn Brennan*

Date:

*9/22/23*

*[Signatory may be a duly authorized representative]*