

**Year 6 Annual Report**  
**Massachusetts Small MS4 General Permit**  
**Reporting Period: July 1, 2023-June 30, 2024**

*\*\*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, 2023 and June 30, 2024 unless otherwise requested.*

**Part I: Contact Information**

Name of Municipality or Organization: Lynn Water & Sewer Commission

EPA NPDES Permit Number: MAR041044

**Primary MS4 Program Manager Contact Information**

Name: Daniel F. O'Neill

Title: Executive Director

Street Address Line 1: 400 Parkland Ave

Street Address Line 2:

City: Lynn

State: MA

Zip Code: 01905

Email: doneill@lynnwatersewer.org

Phone Number: (781) 596-2400

**Stormwater Management Program (SWMP) Information**

SWMP Location (publicly available web address): na

Date SWMP was Last Updated: Aug 19, 2020

If the SWMP is not available on the web please provide the physical address:

LWSC Headquarters

## 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 10 with information from completed catchment investigations
- Provided training to employees involved in IDDE program within the reporting period
- Properly stored and disposed of catch basin cleanings and street sweepings so they did not discharge to receiving waters
- All curbed roadways were swept at least once within the reporting period
- Enclosed all road salt storage piles or facilities and implemented winter road maintenance procedures to minimize the use of road salt
- Implemented SWPPPs for all permittee owned or operated maintenance garages, public works yards, transfer stations, and other waste handling facilities

- Updated inventory of all permittee owned facilities as necessary
- O&M programs for all permittee owned facilities have been completed and updated as necessary
- Implemented all maintenance procedures for permittee owned facilities in accordance with O&M programs
- Implemented program for MS4 infrastructure maintenance to reduce the discharge of pollutants
- Inspected all permittee owned treatment structures (excluding catch basins)

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

SWPPP/ O&M procedures exist for LWSC owned and operated facilities (WWTP, WTP). City of Lynn Department of Public Works is the responsible party for roadway maintenance, street sweeping, salt storage, public works yards, etc. Lynn Water and Sewer Commission (LWSC) is a separate entity from the City of Lynn and has no jurisdiction over City of Lynn Departments.

### **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:

Pamphlet posted in Lobby encouraging proper disposal of dog waste. City of Lynn Clerk's Office is the responsible party for issuing dog licenses. City of Lynn Department of Inspectional Services is the responsible party for septic system inspections. Lynn Water and Sewer Commission (LWSC) is a separate entity from the City of Lynn and has no jurisdiction over City of Lynn Departments.

### **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

- Installed a structural BMP as a demonstration project within the drainage area of the water quality limited water or its tributaries. The type of BMP installed is (e.g. biofiltration):

[Empty text box for BMP type]

Any structural BMPs listed in Attachment 3 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 3 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:

[Empty text box for website]

Total estimated nitrogen removed in lbs/year from the installed BMPs: 0

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:

Pamphlet posted in Lobby encouraging proper disposal of dog waste. City of Lynn Department of Public Works is the responsible party for yard waste, leaf litter, and street sweeping. Lynn Water and Sewer Commission (L WSC) is a separate entity from the City of Lynn and has no jurisdiction over City of Lynn Departments.

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*

- Installed a structural BMP as a demonstration project within the drainage area of the water quality limited water or its tributaries. The type of BMP installed is (*e.g. biofiltration*):

- 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:

Pamphlet posted in Lobby encouraging proper disposal of dog waste. City of Lynn Department of Public Works is the responsible party for yard waste, leaf litter, and street sweeping. Lynn Water and Sewer Commission (LWSC) is a separate entity from the City of Lynn and has no jurisdiction over City of Lynn Departments.

**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:

LWSC has no jurisdiction or control over Street Sweeping. This is through the City of Lynn DPW who is a separate entity.

- 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:

City of Lynn Department of Public Works is the responsible party for conducting street sweeping. Lynn Water and Sewer Commission (LWSC) is a separate entity from the City of Lynn and has no jurisdiction over City of Lynn Departments. LWSC prioritizes catch basin cleaning in areas of the City that accumulate more

sediment in catch basin sumps, especially those located in a MS4 watershed.

**Lake and Pond Phosphorus TMDL**

*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 rate from LPCP Area (lbs/year) [A]:

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

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

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

Implemented all nonstructural control measures **during this reporting period** and documented the measures and their phosphorus reduction. The nonstructural control measure information:

- is attached to the email submission
- 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. The structural control measure information:

- is not applicable; no structural control measures were implemented
- is attached to the email submission
- can be found at the following publicly available website:

The LPCP: (select one of the following options. If you submitted your LPCP last year and have an updated website, please include the website below)

- was submitted in the Year 5 Annual Report
- is attached to the email submission

can be found at the following publicly available website:

*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:

City of Lynn Department of Public Works is the responsible party for operating, treating, and maintaining the ponds in the City. Lynn Water and Sewer Commission (LWSC) is a separate entity from the City of Lynn and has no jurisdiction over City of Lynn Departments.

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

The LWSC has complied with MS4 requirements to the best of our ability, given the limited jurisdiction LWSC has within the management and operation of the City of Lynn. The City of Lynn is the owner and operator responsible for several aspects under this permit, including but not limited to: additional garages and facilities, parking lot and roadway maintenance, disposal of household and yard waste, stipulations for developers/new developments, wetlands/drainage basins, operation and treatment of ponds, etc.

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

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

- Yes
- No

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

## Part IV: Minimum Control Measures

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

### MCM1: Public Education

Number of educational messages completed during this reporting period: 4

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: Pollution Prevention for Businesses**

Message Description and Distribution Method:

Pamphlet promoting pollution prevention for businesses

Targeted Audience: Businesses, institutions and commercial facilities

Responsible Department/Parties: DPW/ ISD/ LWSC

Measurable Goal(s):

Educate businesses about the benefits of Pollution Prevention. While LWSC posts an educational pamphlet in the office lobby, LWSC has no jurisdiction over private properties or business permits. LWSC also has no jurisdiction to enforce waste or litter ordinances in the City.

Message Date(s): Year round in lobby

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: Builder's Guide to Low-Impact Development**

Message Description and Distribution Method:

Pamphlet promoting Low Impact Development

Targeted Audience: Developers (construction)

Responsible Department/Parties: Conservation Committee, Planning Board, Planning Department

Measurable Goal(s):

While LWSC posts an educational pamphlet in the office lobby, LWSC has no jurisdiction over developments in the City outside of w/s/d infrastructure. LWSC also has no jurisdiction to allow or deny developments

within the City, promote or require LID, or enforce stipulations of the development. The Committees/ departments listed above could enforce these measures, and are under jurisdiction of the City of Lynn.

Message Date(s): Year round in lobby

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 Pollution Prevention for Industrial Sites**

Message Description and Distribution Method:

Pamphlet highlighting BMP's for stormwater pollution prevention

Targeted Audience: Industrial facilities

Responsible Department/Parties: LWSC/ISD

Measurable Goal(s):

Emphasize importance of reducing stormwater pollution from sites within the City. Enforcement of this goal would be under the jurisdiction of the City of Lynn.

Message Date(s): Year round in LWSC lobby

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:What you can do as a Citizen**

Message Description and Distribution Method:

Educational flier about common household stromwater pollution issues.

Targeted Audience: Residents

Responsible Department/Parties: DPW Operations

Measurable Goal(s):

While L WSC posts an educational pamphlet in the office lobby, L WSC has no jurisdiction over developments in the City outside of w/s/d infrastructure. LWSC also has no jurisdiction to allow or deny developments within the City, promote or require LID, or enforce stipulations of the development. The

Committees/Departments listed above could enforce these measures, and are under jurisdiction of the City of Lynn.

Message Date(s): Year round in LWSC lobby.

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:

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**Percent of Phase II map complete: *Optional: Provide additional status information regarding your map:*ArcGIS and VUEworks software is up to date and is updated regularly as needed.  
**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:*

Continued to conduct CCTV inspection and sampling within the largest watershed (King's Beach, approximately 725 acres) and Flax Pond watershed with consulting firm Environmental Partners Group.

**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:

On the job training occurs year round.

### 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:*

Majority of projects are on-going.

#### 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:

City of Lynn Department of Public Works and Planning Department are the responsible parties for street and parking lot design requirements for developers. Lynn Water and Sewer Commission (L WSC) is a separate entity from the City of Lynn and has no jurisdiction over City of Lynn Departments.

**Green Infrastructure Report**

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

City of Lynn Department Planning Department and Inspectional Services would be the responsible parties for GI practices or requirements for developers. Lynn Water and Sewer Commission (L WSC) is a separate entity from the City of Lynn and has no jurisdiction over City of Lynn Departments.

**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):

NA see above

Below, list all properties that have been modified or retrofitted with BMPs to mitigate impervious area that were inventoried as part of 2.3.6.d of the permit and the type of BMP(s) implemented. Non-MS4 owned properties that have been modified or retrofitted with BMPs to mitigate impervious area may also be listed, but must be indicated as non-MS4.

NA see above

## MCM6: Good Housekeeping

### Catch Basin Cleaning

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

Number of catch basins inspected:

Number of catch basins cleaned:

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

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

Total number of catch basins:

If applicable:

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

Increase the catch basin cleaning in areas prone to heavier debris collection (downtown, low-lying drainage areas, bottom of steep roadway, etc)

### 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:

N/A

### Additional Information

#### Monitoring or Study Results

*Results from any other stormwater or receiving water quality monitoring or studies conducted during the reporting period not otherwise mentioned above, where the data is being used to inform permit compliance or permit effectiveness must be attached.*

- Not applicable
- The results from additional reports or studies are attached to the email submission
- The results from additional reports or studies can be found at the following publicly available website(s):

If such monitoring or studies were conducted on your behalf or if monitoring or studies conducted by other entities were reported to you, a brief description of the type of information gathered or received shall be described below:

#### Additional Information

Enter any additional information relevant to your stormwater management program implementation during the reporting period. Include any BMP modifications made by the MS4 if not already discussed above.

Several year 6 requirements could not be completed due to the limited jurisdiction of LWSC within the operations of the City of Lynn, as noted in the previous annual reports.

### Year 7

#### 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 7 requirements summarized below. (Note: impaired waters and TMDL requirements are not listed below)

Yes, I agree

- Complete investigations of catchments associated with Problem Outfalls
- Complete investigations of catchments where any information gathered on the outfall/interconnection identifies sewer input

#### 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 7 below:

As the current permit holder, LWSC will continue to implement stormwater management program elements to the best of our ability, given limited jurisdiction within the City and limited control in it's operations.

## Part V: Certification of Small MS4 Annual Report 2024

### 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]*