

**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:

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 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:

### **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:

### **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: 6.2

*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:

When new BMPs are installed the Town will complete follow-up data required to recalculate the phosphorus reduction. A demonstration project was not completed in PY6, however, the retrofit opportunity identified at the DPW Facility is currently under the design process. This project is planned to be completed in PY7. This project was delayed due to staffing storages, funding, and PY6 workload.

**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://sudbury.ma.us/dpw/>

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

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

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

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

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

- Yes
- No

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

## Part IV: Minimum Control Measures

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

### MCM1: Public Education

Number of educational messages completed **during this reporting period:**

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

#### **BMP: Town of Sudbury Website**

Message Description and Distribution Method:

The Town's website includes pages about their comprehensive wastewater management plan (CWMP), interactive, public stormwater map, and updates to their stormwater management program. The CWMP page is a resource to residents, neighborhoods, and businesses that need information and suggestions regarding their wastewater issues and solutions. This site has the capacity to give the public necessary information to curb potential wastewater leaks, spills, or contaminations that may occur due to certain constraints or issues they are experiencing. The interactive map shows all of the Town's drainage system lines, catch basins, manholes, and outfalls. This information can be used for the public's personal education and awareness. The Stormwater Management page contains information about the Town's efforts to comply with the MS4 permit along with links to the DPW's letter to residents and educational flyer about IDDE inspections as well as links to present and past stormwater management plans.

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

Post educational messages on Town and DPW Facebook pages and the Town of Sudbury website. Maintain educational content throughout the permit term.

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:

Additional educational content has been posted as needed to address outreach priorities in any given year. This is a supplemental outreach effort.

#### **BMP: Additional Educational Messaging - DPW Facebook Page**

Message Description and Distribution Method:

The Town's DPW Facebook page frequently posts various educational messages regarding proper stormwater management, including but not limited to, stormwater pollution sources, proper fertilizer usage, septic system

management, and pet waste disposal. Below are the education messages for this permit year.

- 4/12/2024,4/18/2024, 5/10/2024, 6/28/2024: “Automotive Body Repair and Vehicle Washing”
- 12/5/2023, 2/1/2024, 2/9/2024, 2/16/2024, 5/28/2024, 6/11/202: “Automotive Repair”
- 9/13/2023, 11/27/2023, 12/1/2023, 12/7/2023, 12/13/2023,12/26/2023,12/28/2023, 12/29/2023, 1/12/2024, 1/18/2024, 2/2/2024, 2/27/2024, 3/1/2024, 3/14/2024, 3/26/2024, 3/29/2024, 4/24/2023, 5/1/2024, 5/9/2024, 5/14/2024, 5/17/2024, 5/20/2024, 6/5/2024: “Cleaning & Maintaining Outdoor Areas”
- 1/25/2024,1/31/2024, 3/7/2024: “Illicit Discharge Detection & Elimination”
- 1/11/2024, 2/8/2024, 2/29/2024, 3/13/2024, 3/15/2024, 3/21/2024, 4/1/2024, 4/8/2024, 4/9/2024, 4/11/2024, 4/15/2024, 4/22/2024, 4/30/2024, 5/3/2024, 5/21/2024, 5/22/2024, 5/30/2024, 6/6/2024, 6/7/2024, 6/13/2024, 6/14/2024, 6/19/2024, 6/21/2024, 6/25/2024, 6/26/2024: “Lawn Care Educational Outreach”
- 11/20/2023, 12/11/2023, 3/11/2024, 5/7/2024: “Leaf/Yard Waste Educational Outreach”
- 11/21/2023, 11/24/2023, 1/5/2024, 1/22/2024, 2/5/2024, 2/23/2024, 2/28/2024, 3/6/2024, 3/18/2024, 3/25/2024, 4/3/2024, 4/5/2024, 4/10/2024, 4/25/2024, 4/26/2024, 5/8/2024, 5/23/2024, 5/29/2024, 6/3/2024, 6/24/2024: “Misc. MS4 BMPs”
- 12/15/2023: “Nurseries & Landscape Industries”
- 11/29/2023, 12/27/2023, 1/30/2024, 2/22/2024, 3/4/2024, 3/19/2024, 4/17/2024, 5/13/2024, 6/4/2024, 6/12/2024, 6/20/2024, 6/27/2024: “Pet Waste Educational Outreach”
- 1/4/2024, 2/7/2024, 3/5/2024, 3/8/2024, 3/20/2024, 3/27/2024, 4/19/2024, 4/24/2024, 5/2/2024, 5/16/2024, 5/31/2024: “Pollution Prevention for Construction Sites, Home Repair and General Contractors”
- 4/29/2024: “Residential & Office Cleaning Industries”
- 4/2/2024: “Retail & Food Services Industries”
- 11/28/2023, 12/6/2023, 1/3/2024,1/17/2024, 2/6/2024, 2/26/2024, 3/28/2024, 4/4/2024, 4/23/2024, 5/24/2024,6/17/2024, 6/18/2024: “Septic System Management Educational Outreach”
- 12/4/2023, 12/20/2023, 12/22/2023, 1/2/2024, 1/4/2024, 1/8/2024, 1/16/2024, 1/19/2024, 1/24/2024, 1/26/2024, 2/15/2024, 2/19/2024, 2/21/2024: “Winter Deicing Educational Outreach”

Targeted Audience: Residents, Businesses, Institutions, and Commercial/Industrial Facilities

Responsible Department/Parties: DPW Operations

Measurable Goal(s):

Maintain educational content throughout the Permit term.

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: Keep Stormwater Drainage Working Properly**

Message Description and Distribution Method:

The Town posts messages on their DPW and Town of Sudbury Facebook pages and posts flyers on their Town of Sudbury website regarding proper stormwater management. The posts and flyers advised the public

to opt for non-toxic pesticides, use fertilizer sparingly, direct downspouts to pervious areas, clear debris from catch basin grates, properly remove and dispose of pet waste, and removal snow and ice. The posts and flyers also explained what simple tasks could do for them, the city, and waterways.

Targeted Audience: Residents

Responsible Department/Parties: DPW Operations

Measurable Goal(s):  
Post educational messages on Town and DPW Facebook pages and the Town of Sudbury website. Maintain educational content throughout the permit term.

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 Sudbury had their SWMP available at the Department of Public Works and on their website for public viewing and commentary. The Planning Board also held regular Town Meetings via Zoom and/or in-person meetings and if residents had comments they would participate in the Zoom and/or in-person call and share their concerns. Residents can also notify the DPW directly if they had any comments or concerns.

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:

Sudbury continues to refine and revise their storm sewer system infrastructure attributes/map. Consistent with the Town's operations programs, staff conduct mapping refinements during capital improvement projects, catch basin and storm sewer cleaning, CCTV inspections and/or other field efforts. In Sudbury, staff use a digital catch basin inspection application that integrates with the Town GIS data. As infrastructure gets built or rehabilitated, updates to the Town's GIS are made. The Town also completes and refines their GIS map to be consistent with their IDDE investigation results.

#### Screening of Outfalls/Interconnections

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

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

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

Number of outfalls screened:

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

Percent of outfalls screened:

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

### **Catchment Investigations**

*If conducted, please submit all data collected during this reporting period as part of the dry and wet weather investigations. Also include the presence or absence of System Vulnerability Factors for each catchment.*

- No catchment investigations were conducted
- The catchment investigation data is attached to the email submission
- The catchment investigation data can be found at the following publicly available website:

*Below, report on the number of catchment investigations completed **during this reporting period.***

Number of catchment investigations completed this reporting period:

*Below, report on the percent of catchments investigated **to date.***

Percent of total catchments investigated:

*Optional: Provide any additional information for clarity regarding the catchment investigations below:*

### **IDDE Progress**

*If illicit discharges were found, please submit a document describing work conducted over this reporting period, and cumulative to date, including location source; description of the discharge; method of discovery; date of discovery; and date of elimination, mitigation, or enforcement OR planned corrective measures and schedule of removal.*

- No illicit discharges were found
- The illicit discharge removal report is attached to the email submission
- The illicit discharge removal report can be found at the following publicly available website:

*Below, report on the number of illicit discharges identified and removed, along with the volume of sewage removed **during this reporting period.***

Number of illicit discharges identified:

Number of illicit discharges removed:

Estimated volume of sewage removed:  gallons/day

*Below, report on the total number of illicit discharges identified and removed to date. At a minimum, report on the number of illicit discharges identified and removed **since the effective date of the permit (July 1, 2018).***

Total number of illicit discharges identified:

Total number of illicit discharges removed:

*Optional:* Provide any additional information for clarity regarding illicit discharges identified, removed, or planned to be removed below:

### **Employee Training**

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

The Town's stormwater team (Public Works, Planning, Conservation and Engineering) conducts frequent internal meetings/trainings on various aspects of the compliance program. Woodard & Curran held training on 12/11/2024 and educated staff on the following topics: SWPPP, IDDE, pollution prevention, and good house keeping.

### **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:

13 Major Permit and 10 General Permit reviews were performed during PY6. All major permits are inspected by third-party inspectors. All general permits are inspected by Town staff (Planning staff, DPW staff, or a combination thereof). Due to staff changes at the end of PY6 / beginning of PY7, the number of construction inspections is unknown for PY6.

### **MCM5: Post-Construction Stormwater Management in New Development and Redevelopment**

#### **Ordinance or Regulatory Mechanism**

Date update was completed (due in year 3):

Additional modifications to the bylaw were adopted on May 4, 2022.

Website of ordinance or regulatory mechanism:

<https://sudbury.ma.us/planning/>

**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:

In PY4, the Town of Sudbury developed the Sudbury Code and Ordinance Assessment and Schedule Memorandum assessing current street design, parking lot guidelines, and other “code” requirements to evaluate ways to minimize creation of impervious cover and allow opportunity for innovative stormwater management. This report can be accessed at the DPW.

**Green Infrastructure Report**

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

In PY4, Town developed the Sudbury Code and Ordinance Assessment and Schedule Memorandum assessing how local regulations affect the ability of development projects to include infiltration practices (e.g. green roofs, rain gardens, curb extensions, planter gardens, and porous and pervious pavement) and water harvesting devices (e.g., rain barrels and cisterns) that promote use of stormwater for non-potable uses. This report can be accessed at the DPW.

**Retrofit Properties Inventory**

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

Town developed the Permit Year 6 Retrofit Memorandum to assess their existing stormwater BMPs, identify sites where impervious areas can be reduced, and assess the likelihood and potential impacts of completing such retrofits. Below is the list of remaining permittee-owned properties that could be modified or retrofitted with BMPs.

Public Works Department Facility (PY6/PY7 design; PY7 planned construction)  
Featherland Park  
Cricket Pond

Town Hall  
 Concepts within Hop Brook Watershed Plan  
 Haskell Field

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.

The Town has begun to design retrofit opportunities identified at the chosen demonstration project for the Public Works Department Facility. This project was delayed due to staffing shortages, funding, and PY6 workload.

## 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:

The town is tracking catch basins with sumps more than 50% full when inspected. If basins were more than 50% full, maintenance activities are increased.

### **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:

(2) SWPPP inspections at the DPW and (2) SWPPP inspections at the Sudbury Transfer Station. The Town of Sudbury has implemented a system that ensures all SWPPP inspections are met during each permit year starting in Q1 2024. In addition to compliance inspections, site review is undertaken on a continuous basis during operations. Facility personnel have been trained on the SWPPP and help to reduce exposure of potential stormwater pollutants through daily operations.

**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.

The Town is in the process of developing a Town of Sudbury Stormwater Asset Management Plan, which is a valuable resource for addressing future stormwater and non-stormwater maintenance needs.

## 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:

### 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]*