Year 4 Annual Report

Massachusetts Small MS4 General Permit Reporting Period: July 1, 2021-June 30, 2022

Please DO NOT attach any documents to this form. Instead, attach all requested documents to an email when submitting the form

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, 2021 and June 30, 2022 unless otherwise requested.

Part I: Contact Information

Name	of Municipality or Organi	zation: City of So	omerville	;				
EPA N	EPA NPDES Permit Number: MAR041082							
Prima	ry MS4 Program Manag	er Contact Info	rmation					
Name:	me: Lucica S. Hiller		Т	Title:	Stormwat	er Progra	m Manag	ger
Street	Address Line 1: 1 Franey	Road						
Street .	Address Line 2:							
City:	Somerville	State: N	MA Zi	ip Coo	de: 02145			
Email:	lhiller@somervillema.gov	V		Phone	e Number	(617) 44	18-3716	
Storm	water Management Prog	ram (SWMP) I	nformati	ion				
SWMP Location (web address): www.somervillema.gov/Stormwater								
Date SWMP was Last Updated: 06/30/2020								
If the S	SWMP is not available on	the web please p	provide th	ne phy	sical addı	ess:		

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

		- T		
Impairment(<u>(s)</u>			
	⊠ Bacteria/Pathogens		☐ Nitrogen	
	⊠ Solids/ Oil/ Grease (H	ydrocarbons)/ Metal	s	
TMDL(s)				
In State:	☐ Assabet River Phospho	orus 🗌 Bacte	eria and Pathogen	☐ Cape Cod Nitrogen
	☐ Charles River Watersh	ed Phosphorus	☐ Lake and Pond	l Phosphorus
Out of State:	☐ Bacteria/Pathogens	☐ Metals	☐ Nitrogen	☐ Phosphorus
	Bacteria i atriogens	ivictais		•
			Cl	lear Impairments and TMDLs
	spleted that permit require Aditional information will b rements		-	equirement leave the box
⊠ require	<u> </u>	_		es and other local cover, made it available as
•	the SWMP, and:	1 1		
	No updates were recomm		1-4 1-4 6	1.4:
	Updates were recommend	ded. The anticipated	date or date of comp	or updates 18/was:
Develo	oped a report assessing loca	l regulations to dete	rmine the feasibility	of making green
⊠ infrastı SWMF	-	when appropriate si	te conditions exist, m	nade it available as part of the
•	No updates were recomm	ended		
C	Updates were recommend	ded. The anticipated	date or date of comp	pletion for updates is/was:
⊠ Identif with B	ied a minimum of 5 permitt MPs to reduce impervious	tee-owned properties	s that could potential	ly be modified or retrofitted
•	you would like to describe previous incomplete milest	_	• •	ments listed above, provide lease use the box below:

City of Somerville Page 3 **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 O This is not applicable because we do not have sanitary sewer O This is not applicable because we did not find any new SSOs O The updated SSO inventory is attached to the email submission • The updated SSO inventory can be found at the following website: www.somervillema.gov/Stormwater ☑ Updated system map due in year 2 as necessary Provided training to employees involved in IDDE program within the reporting period Properly stored and disposed of catch basin cleanings and street sweepings so they did not discharge to receiving waters All curbed roadways were swept at least once within the reporting period Enclosed all road salt storage piles or facilities and implemented winter road maintenance procedures to minimize the use of road salt Implemented SWPPPs for all permittee owned or operated maintenance garages, public works yards, transfer stations, and other waste handling facilities ☑ Updated inventory of all permittee owned facilities as necessary ⊠ O&M programs for all permittee owned facilities have been completed and updated as necessary Implemented all maintenance procedures for permittee owned facilities in accordance with O&M programs ☑ Implemented program for MS4 infrastructure maintenance to reduce the discharge of pollutants ☐ Inspected all permittee owned treatment structures (excluding catch basins) Optional: If you would like to describe progress made on any incomplete requirements listed above or provide

any additional details, please use the box below:

The SWMP is available on-line for residents to read and ask questions. The SWMP is currently being updated into a public facing report that will be made available by the end of 2022. The City will schedule a follow-up public meeting in the Spring of 2023 to solicit public comments and feedback.

The City of Somerville relies on third party contractors to implement the IDDE Program. City staff directly involved in the implementation of the IDDE program at this stage of dye testing residences is minimal. For these reasons, IDDE employee training this reporting period focus on hands-on in -the-field training while performing dye testing of pipe connectivity under the supervision of the Stormwater Program Manager.

The City does not currently have any facilities in the MS4 area that require SWPPPs.

The City, like many other communities, is struggling to find staff for inspection, operation, and maintenance

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of our systems. We have not inspected all the city-owned treatment structures because of limited staff availability and instead focused our inspections on newly built treatment structures that also have significant phosphorus water quality benefits. Several hydrodynamic separators have been identified and flagged for inspection and maintenance through a third party catch basin cleaning contract in the coming years. Additionally, the City is currently working on bidding the O&M of all our city-owned stormwater treatment structures, both in the MS4 and outside the MS4 area, and we expect to start this contract in the Spring of 2023.

Bacteria/ Pathogens (Combination of Impaired Waters Requirements and TMDL Requirements as Applicable
Annual Requirements

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
* Public education messages can be combined with other public education requirements as applicable (see Appendix H and F for more information)
Optional: If you would like to describe progress made on any incomplete requirements listed above or provide any additional details, please use the box below:
The City does not have any residences with septic systems so will not be distributing information regarding maintenance of septic systems.
The City is still working to distribute information at the time of the licensing to supply dog owners with educational materials regarding the proper disposal of pet waste.
Chloride
☐ Completed the Salt Reduction Plan due in Year 3, updated if necessary
○ The Salt Reduction Plan is attached to the email submission
○ The Salt Reduction Plan can be found at the following website:
Annual Requirements
Public Education and Outreach
Included an annual message in November/ December to private road salt applicators and commercial
industrial site owners on the proper storage and application rates of winter deicing material, along with
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for amount of salt:
Type(s) of salt applied: plain road salt and ICEB'GONE MAGIG brand treated salt
Amount of salt applied: 1,043.31 tons (plain road salt) and 5,560.26 tons (treated salt)
the steps that can be taken to minimize salt use and protect local waterbodies Please fill out the following information on salt usage over Year 4 of the permit. Be sure to include units for amount of salt: Type(s) of salt applied: plain road salt and ICEB'GONE MAGIG brand treated salt

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:

Chloride is a new impairment for the Alewife Brook based on the Final 2018/2020 Integrated List of Waters (303(d) list) that was approved by EPA on February 2, 2022. The City understands that we have three years from 2022 to develop a Salt Reduction Plan. The Public Education Program will also be updated to incorporate the chloride public education requirement.

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)

Phosphorus Source Identification Report

- ⊠ Completed the Phosphorus Source Identification Report
 - O The Phosphorus Sourchace Identification Report is attached to the email submission
 - The Phosphorus Source Identification Report can be found at the following website:

www.somervillema.gov/Stormwater

Potential structural BMPs

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.

O The BMP information is attached to the email submission

The BMP information can be found at the following 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:

The Stormwater Management website has been updated to include educational information about proper pet waste disposal, grass clippings and fertilizer use, and leaf litter in our City. Additionally the City is relying on the educational materials developed and distributed by MyRWA and other local organizations (i.e. ThinkBlue

Massachusetts).

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
 - O The street sweeping schedule is attached to the email submission
 - The street sweeping schedule can be found at the following website:

https://www.somervillema.gov/departments/sweeping

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

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

The City has an extensive street sweeping program ad the existing street sweeping contract with a third party vendor is set for sweeping every public street every other week. The City is not currently considering further increasing the sweeping frequency in our MS4 area.

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

The City's Stormwater Management website (www.somervillema.gov/Stormwater) has been updated this reporting period to include additional information about what the City is doing to manage stormwater and stormwater pollution, and also educational materials targeted at the four audiences on stormwater pollution topics most prevalent in our urban environment.

The City is part of the Mystic River Stormwater Collaborative and relies on the Mystic River Watershed Association to provide targeted educational materials at the required frequency. The City then posts these materials on our social media accounts and website.

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 City has made changes to the list of receiving waters and impairments based on the Final 2018/2020 Integrated List of Waters (303(d) list) that was approved by EPA on February 2, 2022. Chloride is now an impairment in the Alewife Brook, segment MA71-20.

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: 5 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: Use Fertilizer Resposabily** Message Description and Distribution Method: A video PSA in English and Spanish was posted on Twitter and the Stormwater page. Message was developed by MyRWA. Targeted Audience: Residents Responsible Department/Parties: Engineering Measurable Goal(s): N/A Message Date(s): June 2022 Appendix H Requirements ⊠ Message Completed for: Appendix F Requirements Was this message different than what was proposed in your NOI? Yes • No O If yes, describe why the change was made: Video versus printed brochure **BMP:Scoop the Poop** Message Description and Distribution Method: Education material was posted on the Stromwater Management page with additional links about how residents can properly dispose of pet waste. Targeted Audience: Residents Responsible Department/Parties: Engineering Measurable Goal(s): N/A

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Message Date(s): May 2022	
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:	
Brochure was posted on-line as opposed to being distributed.	
BMP:Leave the Leaves and Yard Waste Message Description and Distribution Method:	
Education material was posted on the Stromwater Management page with additional links about how can be a leaf hero with a link to the yard waste collection calender.	residents
Targeted Audience: Residents	
Responsible Department/Parties: Engineering	
Measurable Goal(s):	
N/A	
Message Date(s): May 2022	
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:	
Information was posted on-line as opposed to being distributed.	
BMP:Keep a (Trash) Lid on It	
Message Description and Distribution Method: Education material was posted on the Stromwater Management page with additional links about tras	h in our
City and watersheds.	ii iii oui
Targeted Audience: Residents	
Responsible Department/Parties: Engineering	
Measurable Goal(s):	
N/A	
Message Date(s): May 2022	

Page 10 City of Somerville Appendix F Requirements Appendix H Requirements Message Completed for: Was this message different than what was proposed in your NOI? Yes • No O If yes, describe why the change was made: This educational material was not identified in the NOI. **BMP: Fowl Water** Message Description and Distribution Method: Video educational advertising campaign on different social media platforms in English and Spanish to help viewers visualize stormwater pollution in our community. This campaign was run by Think Blue Massachusetts for all the members of the Mystic River Watershed Collaboartive. Targeted Audience: Residents Responsible Department/Parties: Engineering Measurable Goal(s): 33,177 FB/Instagram English impressions 5,101 FB/Instagram Spanish Impressions 55,278 YouTube English impressions 6,554 YouTube Spanish impressions Message Date(s): from May 31st to June 17th 2022 Message Completed for: Appendix F Requirements Appendix H Requirements ⊠ Was this message different than what was proposed in your NOI? Yes • No O If yes, describe why the change was made: This educational campaign was not included in our initial NOI. 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 City's SWMP is available on-line for residents to read and ask questions. The SWMP is currently being updated into a public facing report that will be made available by the end of 2022. The City will schedule a follow-up public meeting in the Spring of 2023 to solicit public comments and feedback.

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
The City hosted a number of public meetings in the Spring and Summer of 2022 to educate and gather input from residents on flooding, water quality, and combined sewer overflow challenges. Stormwater management was a topic included in the presentation to the public.
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: 0
Number of SSOs removed: 0
MS4 System Mapping
Optional: Provide additional status information regarding your map:
The City's System Map has been updated since last year, as the City is refining the GIS system and connectivities through the extensive IDDE implementation program and coordination with DCR. The updated map can be found at www.somervillema.gov/Stormwater.
Screening of Outfalls/Interconnections
Sercening of Outrans/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
O The outfall screening data is attached to the email submission
○ The outfall screening data can be found at the following website:
Below, report on the number of outfalls/interconnections screened during this reporting period.
Number of outfalls screened: 0
Below, report on the percent of outfalls/interconnections screened to date .

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Percent of outfalls screened: 100			
Optional: Provide additional information regarding your outfall/int	erconnection screening:		
Somerville has completed the dry weather and wet weather outfall a Permit Year 3. Additional screening and sampling is planned if and removed.	screening and sampling by the end of		
Catchment Investigations			
If conducted, please submit all data collected during this reporting investigations. Also include the presence or absence of System Vuln			
O No catchment investigations were conducted			
The catchment investigation data is attached to the e			
• The catchment investigation data can be found at the	e following website:		
www.somervillema.gov/Stormwater			
Below, report on the number of catchment investigations completed	during this reporting period.		
Number of catchment investigations completed this	reporting period: 0		
Below, report on the percent of catchments investigated to date.			
Percent of total catchments investigated: 95			
Optional: Provide any additional information for clarity regarding to	the catchment investigations below:		
Catchment investigations are continuing for the catchments in our ladditional tributary area draining into MS4 outfalls - 11, 21, 25, 31 and, as connectivity is confirmed, the City will update the system in	MS4 that have been identified as having , and 32. Field investigations are ongoing		
IDDE Progress			
If illicit discharges were found, please submit a document describin period, and cumulative to date, including location source; descripti date of discovery; and date of elimination, mitigation, or enforceme schedule of removal. No illicit discharges were found	on of the discharge; method of discovery;		
 The illicit discharge removal report is attached to the email submission 			
 The illicit discharge removal report can be found at 	the following website:		
www.somervillema.gov/Stormwater			
Below, report on the number of illicit discharges identified and rem removed during this reporting period.	oved, along with the volume of sewage		
Number of illicit discharges identified: 1			
Number of illicit discharges removed: 1			
Estimated volume of sewage removed: 165	gallons/day		

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

Total number of illicit discharges identified:	1
Total number of illicit discharges removed:	1

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

The City was successful in contacting the property owner at 1241 Broadways Street and educating them in the next steps needed to remove the illicit connection identified in the sewer lateral at their property. On July 4th, a three-alarm fire broke out at the property and the three-apartment house has been uninhabitable since. The City has flagged this address in the permitting system: when a demolition permit comes through the conditions on that permit will be to cut and cap all existing utilities at their respective mains; when a building permit comes through the applicant will be required to create a new sewer connection before a Certificate of Occupancy is issued. For these reasons, the City considers that this illicit connection has been removed as of July 4th 2022. The City plans to conduct:

- confirmatory dye testing at this location at the time the Certificate of Occupancy is issued, and
- additional dye testing in the upstream and downstream sewer manholes to confirm that no additional illicit connections exist in that segment of the pipe.

Employee Training

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

IDDE employee training this reporting period focused on hands-on field training with the Stormwater Program Manager and Sewer staff. This training included dye testing on Weston Ave (Catchment 7) and Fairfax Street (Catchment 11) to verify connectivity and interconnections.

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: 1		
Number of inspections completed: 1		
Number of enforcement actions taken: 0		

Optional: Enter any additional information relevant to construction site plan reviews, inspections, and enforcement actions:

The City finalized the Site Review and Site Inspection Procedures in June 2022. These procedures are being implemented citywide, not only for the MS4 area, for any construction sites that fall under the MCM 4 and 5 thresholds.

Site Plan Reviews:

- Home Depot repaying of parking lot project. Through the site plan review process, the City was able to confirm drainage connectivity from the Home Deport site to the City's MS4.
- two additional site reviews were completed for two parcels adjacent to one of the MS4 catchments (5 Middlesex and 74 Middlesex Ave.).

Inspections and Enforcements:

- During this reporting period, only one construction site was active: 290 Revolution Drive. This site was inspected and no enforcement actions have been taken.

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

Ordinance or R	Regulatory	Mechanism

Date update was completed (due in year 3):	August 2020
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As-built Drawings

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

Number of as-built drawings received:	1
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Optional: Enter any additional information relevant to the submission of as-built drawings:

The as-built drawings for 290 Revolution Drive was received	this reporting period.
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Retrofit Properties Inventory

Below, list the permittee-owned properties that could be modified or retrofitted with BMPs to mitigate impervious areas (at least 5):

- Woodstock Street Playground, Alewife Brook Parkway, catchment 4
- Vacant (Silver Parcel), Russel Road, Catchment 7
- Healy School Rear Parcel, Mount Vernon Avenue, Catchment 21
- Healy School, Meacham Street, Catchment 21
- Ten Hills Playground, Governor Winthrop Road, Catchment 26

MCM6: Good Housekeeping

Below, report on the number of catch bast removed from the catch basins <mark>during this</mark>	1	anea, atong with the total v	oiume of materiai	
Number of catch basins ins	spected: 480			
Number of catch basins cle	eaned: 476			
Total volume or mass of m	naterial removed from	m all catch basins: 440	cubic yards	
Below, report on the total number of catch	h basins in the MS4 s	system.		
Total number of catch basi	ns: 480			
If applicable:				
Report on the actions taken if a catch basi inspections/cleaning events:	n sump is more than	50% full during two conse	cutive routine	
During this reporting period, we started us basis. To collect field data, we are relying basins sump debris data is currently based	g on tablets equipped	with the Esri Survey123 ap		
Street Sweeping Report on street sweeping completed duri	ng this reporting pe	riod using <u>one</u> of the three i	metrics below.	
• Number of miles cleaned:	12.5			
O Volume of material remov	red:	[Select Units]		
O Weight of material removed:		[Select Units]		
Stormwater Pollution Prevention Plan (Below, report on the number of site inspections reporting period. Number of site inspections	ctions for facilities th	nat require a SWPPP compl	leted during this	
Describe any corrective actions taken at a	facility with a SWF	PP:		
The City does not have any facilities in th	<u> </u>			

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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 O The results from additional reports or studies can be found at the following 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: **COVID-19 Impacts** Optional: If any of the above year 4 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 5 requirements summarized below. (Note: impaired waters and TMDL requirements are not listed below) Yes, I agree 🖂

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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 5 below:					

Part V: Certification of Small MS4 Annual Report 2021

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:	Richard E. Raiche	Title:	Director or IAM
	[Signatory may be a duly authorized representative]	Date:	09/28/22

Note: When prompted during signing, save the document under a new file name.

Annual Report Submission

Please submit the form electronically via email to both EPA and MassDEP by clicking on one of the links below or using the email addresses listed below. Please ensure that all required attachments are included in the email and not attached to this PDF.

EPA: stormwater.reports@epa.gov MassDEP: Stormwater.DEP@mass.gov

Paper Signature:

If you did not sign electronically above, you can print the signature page by clicking the button below.

Print Signature Page

Optional: If you did not sign electronically above, you may lock the form by clicking the "Lock Form" button below which will prompt you to save the locked version of the form. Save this locked version under a new file name.

Lock Form