

# Year 1 Annual Report

## Massachusetts Small MS4 General Permit

### Reporting Period: May 1, 2018-June 30, 2019

**\*\*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.*

### Part I: Contact Information

Name of Municipality or Organization: Town of Billerica, MA

EPA NPDES Permit Number: MA041182

#### Primary MS4 Program Manager Contact Information

Name: Kelley Conway

Title: Town Engineer

Street Address Line 1: DPW - Engineering Division

Street Address Line 2: 365 Boston Road

City: Billerica

State: MA

Zip Code: 01821

Email: kconway@town.billerica.ma.us

Phone Number: (978) 671-1300

Fax Number: (978) 671-0958

#### Stormwater Management Program (SWMP) Information

SWMP Location (web address): <https://www.town.billerica.ma.us/214/Stormwater-Management>

Date SWMP was Last Updated: March 2019

If the SWMP is not available on the web please provide the physical address and an explanation of why it is not posted on the web:

## Part II: Self Assessment

First, in the box below, select the impairment(s) and/or TMDL(s) that are applicable to your MS4.

### 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.

### Year 1 Requirements

- ☒ Develop and begin public education and outreach program  
☒ Identify and develop inventory of all known locations where SSOs have discharged to the MS4 in the last 5 years
  - ☒ The SSO inventory is attached to the email submission
  - ☐ The SSO inventory can be found at the following website:☒ Develop written IDDE plan including a procedure for screening and sampling outfalls  
☒ IDDE ordinance complete  
☒ Identify each outfall and interconnection discharging from MS4, classify into the relevant category, and priority rank each catchment for investigation
  - ☒ The priority ranking of outfalls/interconnections is attached to the email submission
  - ☐ The priority ranking of outfalls/interconnections can be found at the following website:☒ Construction/ Erosion and Sediment Control (ESC) ordinance complete  
☒ Develop written procedures for site inspections and enforcement of sediment and erosion control measures  
☒ Develop written procedures for site plan review  
☒ Keep a log of catch basins cleaned or inspected  
☐ Complete inspection of all stormwater treatment structures

### Annual Requirements

- ☒ Annual opportunity for public participation in review and implementation of SWMP
- ☒ Comply with State Public Notice requirements
- ☒ 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
- ☒ All curbed roadways have been swept a minimum of one time per year

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

Annual Requirements

*Public Education and Outreach\**

- ☒ Annual message encouraging the proper management of pet waste, including noting any existing ordinances where appropriate
- ☒ Permittee or its agents disseminate educational material to dog owners at the time of issuance or renewal of dog license, or other appropriate time
- ☒ Provide 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)*

**Phosphorus** (Combination of Impaired Waters Requirements and TMDL Requirements as Applicable)

Annual Requirements

*Public Education and Outreach\**

- ☒ Distribute 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 and phosphorus-free fertilizers
- ☒ Distribute an annual message in the summer (June/July) encouraging the proper management of pet waste, including noting any existing ordinances where appropriate
- ☒ Distribute 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*

- ☐ Increase 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)

*Potential structural BMPs*

- ☐ Any structural BMPs listed in Attachment 3 to Appendix F already existing or installed in the regulated area by the permittee or its agents shall be tracked and the permittee shall estimate the phosphorus removal by the BMP consistent with Attachment 1 to Appendix H. Document 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 in each annual report

Use the box below to input additional details on any unchecked boxes above or any additional information you would like to share as part of your self assessment:

Year 1 Requirements, Inspect all stormwater treatment structures: Mapping of structural BMPs and stormwater treatment structures is not due until Permit Year 2. Therefore, all BMPs were not inspected during Permit Year 1. This will begin in Permit Year 3, after Town-owned structural BMPs and treatment structures have been identified and mapped as part of Phase I mapping efforts.

Phosphorus Good Housekeeping: All paved streets are swept at least once annually, and priority areas are swept twice annually. The town anticipates increasing the street sweeping frequency in target watersheds in future Permit Years to meet impairment and TMDL requirements, dependent on available funding.

Phosphorus Potential Structural BMPs: Mapping of structural BMPs and stormwater treatment structures is not due until Permit Year 2. Therefore, BMPs have not been tracked or estimated for phosphorus removal. This will begin during Permit Year 3, after Town-owned structural BMPs and treatment structures have been identified and mapped as part of Phase I mapping efforts.

### 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:

During Permit Year 1, the Town has modified its outfall mapping as the GIS is improved and outfall investigation field work is completed. 85 outfalls were removed from the MS4 mapping because they were determined to be privately-owned or a different stormwater asset (e.g., culvert or BMP structure), which removed the following receiving water from what was listed in the NOI: Wetland to Unnamed Tributary to Lubbers Brook. This did not change any impairments or TMDLs listed in the NOI.

The Town completed a desktop exercise throughout Permit Year 1 to improve mapping and identified 41 new outfalls. Assigning receiving waters and a priority ranking for each outfall is in progress, but was not finalized in time to be included in the submission of this annual report. This effort will be completed in Permit Year 2, prior to visiting outfalls for IDDE field investigations.

## 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 the reporting period: 6+

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

#### **BMP: Education and Outreach to Residents: Neighborhood Meetings**

Message Description and Distribution Method:

Post cards, pamphlets, and flyers were distributed to residents at neighborhood meetings. Topics of the educational materials included avoiding excessive fertilizer use, proper disposal of waste oil, low impact development, proper pet waste disposal, and general information about stormwater conveyance.

Targeted Audience: Residents

Responsible Department/Parties: DPW

Measurable Goal(s):

Copies of the materials were available to residents during the neighborhood meetings. There were approximately 100 attendees at the neighborhood meetings.

Message Date(s): 6/10/2019, 6/11/2019, 6/12/2019 (two meetings), 6/13/2019

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: Education and Outreach to Residents and Businesses: 2018 Water Quality Report**

Message Description and Distribution Method:

The 2018 Drinking Water Quality report included two pages dedicated to stormwater, including an overview of the Small MS4 program, general stormwater management topics, and a discussion about proper pet waste disposal. The report was mailed out to all Billerica properties with water accounts.

Targeted Audience: Residents and Businesses, institutions and commercial facilities

Responsible Department/Parties: DPW

Measurable Goal(s):

Copies of the drinking water quality reported were distributed to all Billerica addresses that receive a water

bill (more than 14,000 residential and business properties).

Message Date(s): Spring 2019

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: Education and Outreach to All Audiences: Stormwater Webpage**

Message Description and Distribution Method:

Billerica maintains a robust stormwater webpage that includes links to the Town's stormwater bylaws and regulations, educational topics regarding IDDE and pollution prevention (including proper lawn care, pet waste management, and automobile maintenance), and other stormwater-related documents, including the SWMP and NOI. Additional stormwater-related messages are also provided on other Town webpages, including proper septic system maintenance information on the Board of Health FAQ page.

Targeted Audience: All audiences

Responsible Department/Parties: DPW

Measurable Goal(s):

There were 210 page hits on the stormwater webpage during Permit Year 1.

Message Date(s): Ongoing

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: Education and Outreach to Residents: ThinkBlue Messaging**

Message Description and Distribution Method:

The Town is a member of the Northern Middlesex Stormwater Collaborative (NMSC), which participated in the Think Blue Massachusetts educational advertisement campaign. Think Blue Massachusetts created a baseline survey to gauge community knowledge on stormwater, released an advertising campaign that targeted member communities, and carried out a follow-up survey to measure the impact of the advertising campaign. A "Fowl Water" video was shared across Facebook, Instagram, and YouTube to educate the public on stormwater runoff, and highlighted proper pet waste management as an example.

Targeted Audience: Residents

Responsible Department/Parties: DPW

Measurable Goal(s):

The follow-up survey indicated that 15.25% of respondents recalled seeing the "Fowl Water" video and those that saw the video were more likely to correctly answer that stormwater pollution ends up in local waterways. The ad campaign received 54,651 impressions across Facebook, Instagram, and YouTube for Billerica.

Message Date(s): June 23 to July 12, 2019

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: Education and Outreach to Residents: Yard Waste Collection**

Message Description and Distribution Method:

Yard Waste collection is advertised on the Town's website and DPW Facebook page. In addition, Waste Management provides a "collection guide" that includes the schedule for yard waste collection and describes how to properly dispose of the yard waste.

Targeted Audience: Residents

Responsible Department/Parties: DPW

Measurable Goal(s):

A 4/25/2019 Facebook post about yard waste collection had 15 comments, 24 likes, and 20 shares. The "collection guide" was mailed to all residents receiving trash pick up.

Message Date(s): Ongoing

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: Education and Outreach to Residents: School Education Program**

Message Description and Distribution Method:

Wastewater staff annually educate school classrooms, from elementary schools to colleges, about water quality and stormwater pollution. Stormwater-related materials were distributed amongst the classrooms, including topics such as pet waste, littering, rain barrels and low impact development, illegal dumping, lawn care and fertilizers, "green" stormwater habits, and stormwater puzzles. Staff also conducted a World Water Monitoring Day with students from the Dutile Elementary School on May 22, 2019.



Targeted Audience: Residents

Responsible Department/Parties: DPW

Measurable Goal(s):

Approximately 110 elementary school classrooms and 20 high school classrooms were visited in Permit Year 1. 50 copies of each educational material were distributed throughout the classrooms. Approximately 10 tours of the wastewater treatment plant were given to middle school, high school, and college groups.

Message Date(s): Ongoing

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 the reporting period:

The Stormwater Management Program (SWMP) was posted for public review on the Town's website and comments were requested from the public. On September 10, 2018, an email was sent to the DPW's distribution list advertising the draft Notice of Intent on the stormwater webpage. The SWMP was also discussed at 5 neighborhood meetings throughout Billerica in June 2019.

Was this opportunity different than what was proposed in your NOI? Yes ☐ No ☒

Describe any other public involvement or participation opportunities conducted during the reporting period:

3 household hazardous waste (HHW) drop-off events were hosted during this reporting period (5/19/2018, 10/20/2018, and 5/18/2019). A total of 19,799 pounds of HHW was collected during these events. Billerica also holds monthly waste oil drop-off days throughout the Permit Year. In Permit Year 1, more than 200 residents disposed of approximately 1,200 gallons of waste oil.

Waste Management provided yard waste collection during the spring and fall with the regular curbside trash and recycling removal.

The Town partners with the Central Massachusetts Mosquito Control Project for restoration and maintenance of almost 9,000 feet of wetlands and ditches, as well as cleaning 19 culverts. Brush, tires, and other accumulated debris were removed from culverts and streams. Efforts also included insertion of larvicides into almost 3,000 Town catch basins.

Billerica's annual 'Clean Up, Green Up' event was held on 4/28/2018 and 5/4/2019. 265+ volunteers participated in these events and the Highway Department disposes of the trash that is collected.

OARS, a local organization whose mission is to protect, improve and preserve the Assabet, Sudbury, and Concord Rivers and their watersheds, held the 32nd annual river cleanup along the Assabet River in Billerica on September 15, 2018. More than 130 volunteers helped pick up trash and debris from the watershed during the event.

### **MCM3: Illicit Discharge Detection and Elimination (IDDE)**

#### **Sanitary Sewer Overflows (SSOs)**

*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:

*Below, report on the total number of SSOs identified in the MS4 system and removed to date. At a minimum, report SSOs identified since 2013.*

Total number of SSOs identified:

Total number of SSOs removed:

#### **MS4 System Mapping**

Describe the status of your MS4 map, including any progress made during the reporting period (phase I map due in year 2):

The Town has improved the stormwater mapping throughout Permit Year 1. Most Phase I mapping elements are complete and the Town is working to add Town-owned stormwater treatment structures. Many Phase II mapping elements are complete, including manholes, catch basins, and most connectivity. The Town will continue to improve the map as modifications are made and the IDDE Program is implemented.

#### **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.*

- ☒ 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:

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

Percent of total outfalls screened: 51

### **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.*

- ☐ The catchment investigation data is attached to the email submission  
☐ The catchment investigation data can be found at the following website:

N/A

*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: 0

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

No catchment investigations were completed during Permit Year 1 and are not required until Permit Year 2.  
There are no known problem catchments.

### **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.*

- ☐ The illicit discharge removal report is attached to the email submission  
☐ The illicit discharge removal report can be found at the following website:

N/A

*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: 0

Number of illicit discharges removed: N/A

Estimated volume of sewage removed: N/A [UNITS]

*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.*

Total number of illicit discharges identified: 0

Total number of illicit discharges removed: N/A

*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 the reporting period:

On 6/25/2019, Tighe & Bond hosted an 'MS4 "101" Training' for 31 Billerica employees from multiple departments, including DPW, Highway, Engineering, Conservation, Facilities, and Schools. Topics included an overview of the MS4 program, Billerica's stormwater management program, illicit discharges to the drainage system, and an overview of good housekeeping in municipal operations.

### **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: 5

Number of inspections completed: 65

Number of enforcement actions taken: 0

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

#### **Ordinance Development**

Describe the status of the post-construction ordinance required to be complete in year 2 of the permit term:

The Stormwater Management By-law, Article XXV of the General By-laws, was adopted in 2007. The Town will review the Stormwater Management Regulations, Chapter 6 of the Board of Health Rules and Regulations, to determine whether updates or additions are needed to meet the requirements of the General Permit in Permit Year 2.

#### **As-built Drawings**

Describe the status of the measures the MS4 has utilized to require the submission of as-built drawings and ensure long term operation and maintenance of completed construction sites required to be complete in year 2 of the permit term:

Complete. Chapter 6 of the Board of Health Rules and Regulations, Stormwater Management Regulations, require submission of as-built drawings and long-term operation and maintenance.

**Street Design and Parking Lots Report**

Describe the status of the street design and parking lots assessment due in year 4 of the permit term, including any planned or completed changes to local regulations and guidelines:

Preparation for the Street Design and Parking Lots Report has not yet begun as this requirement is due in Permit Year 4.

**Green Infrastructure Report**

Describe the status of the green infrastructure report due in year 4 of the permit term, including the findings and progress towards making the practice allowable:

Preparation for the Green Infrastructure Report has not yet begun as this requirement is due in Permit Year 4.

**Retrofit Properties Inventory**

Describe the status of the inventory, due in year 4 of the permit term, of permittee-owned properties that could be modified or retrofitted with BMPs to mitigate impervious areas and report on any properties that have been modified or retrofitted:

Preparation for the Retrofit Properties Inventory has not yet begun as this requirement is due in Permit Year 4.

**MCM6: Good Housekeeping****Catch Basin Cleaning**

Describe the status of the catch basin cleaning optimization plan:

The schedule to gather information to develop the catch basin cleaning optimization plan is attached.

*If complete, attach the catch basin cleaning optimization plan or the schedule to gather information to develop the optimization plan:*

- ☒ The catch basin cleaning optimization plan or schedule is attached to the email submission
- ☐ The catch basin cleaning optimization plan or schedule can be found at the following website:

*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: 3,808

Number of catch basins cleaned: 3,808

Total volume or mass of material removed from all catch basins: 390.73 tons

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

Total number of catch basins: 4,793

*If applicable:*

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

In Permit Year 2, the Town will complete targeted catch basin cleaning for catch basins that were more than 40% full during the last cleaning.

### **Street Sweeping**

Describe the status of the written procedures for sweeping streets and municipal-owned lots:

Billerica's Highway Division sweeps all streets annually from late spring until late autumn, and some streets are swept twice. Written procedures for street sweeping will be formalized during development of a written operation and maintenance plan in Permit Year 2.

*Report on street sweeping completed during the reporting period using one of the three metrics below.*

☐ Number of miles cleaned:

☒ Volume of material removed: 576 CY

☐ Weight of material removed: [UNITS]

*If applicable:*

For rural uncurbed roadways with no catch basins, describe the progress of the inspection, documentation, and targeted sweeping plan:

### **Winter Road Maintenance**

Describe the status of the written procedures for winter road maintenance including the storage of salt and sand:

Written procedures for winter road maintenance will be formalized during development of a written operation and maintenance plan in Permit Year 2.

**Inventory of Permittee-Owned Properties**

Describe the status of the inventory, due in year 2 of the permit term, of permittee-owned properties, including parks and open spaces, buildings and facilities, and vehicles and equipment, and include any updates:

The Town possesses institutional knowledge of Town-owned properties to be included in the inventory. The Town will develop a written inventory during Permit Year 2.

**O&M Procedures for Parks and Open Spaces, Buildings and Facilities, and Vehicles and Equipment**

Describe the status of the operation and maintenance procedures, due in year 2 of the permit term, of permittee-owned properties (parks and open spaces, buildings and facilities, vehicles and equipment) and include maintenance activities associated with each:

Operation and maintenance procedures associated with the properties included in the inventory will be formalized during development of a written operation and maintenance plan in Permit Year 2.

**Stormwater Pollution Prevention Plan (SWPPP)**

Describe the status of any SWPPP, due in year 2 of the permit term, for permittee-owned or operated facilities including maintenance garages, public works yards, transfer stations, and other waste handling facilities where pollutants are exposed to stormwater:

The Town has an established SWPPP for the Wastewater Treatment Facility (September 2015). A SWPPP has been drafted for the Department of Public Works Highway Facility and will be finalized in Permit Year 2. The Town will identify any additional properties and facilities that are in need of a SWPPP and will prepare these in accordance with the General Permit by the end of Permit Year 2.

*Below, report on the number of site inspections for facilities that require a SWPPP completed during this reporting period.*

Number of site inspections completed: 4

Describe any corrective actions taken at a facility with a SWPPP:

None

**O&M Procedures for Stormwater Treatment Structures**

Describe the status of the written procedure for stormwater treatment structure maintenance:

Written procedures for operation and maintenance of stormwater treatment structures will be formalized during development of a written operation and maintenance plan in Permit Year 2.

## 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 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:

Billerica has completed a significant portion of the dry weather screening field effort. Two rounds of field work have been completed, in Summer 2018 and in Summer 2019, by the Town's stormwater consultant, Town staff, and Billerica summer interns. Included in this annual report is the data for all of the field work completed to date. The data completed prior to Permit Year 1 is included in a memorandum summarizing the work completed. The data completed at the end of Permit Year 1 should be considered draft as it is being finalized by the Town's stormwater consultant. The Town continues to implement its IDDE Program and complete dry weather outfall screening in accordance with the General Permit schedule.

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

Yes, I agree ☒



Annual Requirements

Provide any additional details on activities planned for permit year 2 below:

The Town acknowledges the General Permit Year 2 requirements and will complete as many activities as possible based on funding and staff availability.

## Part V: Certification of Small MS4 Annual Report 2019

### **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:

Abdul Alkhatib

Title:

Director of Public Works

Signature:

Date:

*[Signatory may be a duly authorized  
representative]*