

# 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

Clear Impairments and TMDLs

Next, check off all requirements below that have been completed. **By checking each box you are certifying that you have completed that permit requirement fully.** If you have not completed a requirement leave the box unchecked. Additional information will be requested in later sections.

Annual Requirements

- Provided an opportunity for public participation in review and implementation of SWMP and complied with State Public Notice requirements
- Kept records relating to the permit available for 5 years and made available to the public
- The SSO inventory has been updated, including the status of mitigation and corrective measures implemented
  - This is not applicable because we do not have sanitary sewer
  - This is not applicable because we did not find any new SSOs
  - The updated SSO inventory is attached to the email submission
  - The updated SSO inventory can be found at the following publicly available website:

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

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

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

The Town of Blackstone has O&M procedures for the following: Parks/Open Spaces, Buildings and Facilities, and Municipal Vehicles and Equipment. The Town currently implements maintenance procedures for permittee owned facilities in accordance with the written O&M plans and will be developing O&M plans for Structural Stormwater BMPs, Winter Road Maintenance, and Street Sweeping Operations in Permit Year 7. The Town currently implements standard procedures for winter road maintenance and street sweeping. Currently, the Town sweeps all streets twice a year, once in the spring and once in the fall. The Town keeps track of the streets swept in a written log. The Town currently implements MS4 infrastructure maintenance procedures as needed.

Five (5) known municipally-owned stormwater BMPs were mapped and inspected in Permit Year 5. These structural BMPs were not inspected during this reporting period. All known structural stormwater BMPs will be inspected during Permit Year 7. Any unmapped structural BMPs will be identified and inspected during mapping efforts in Permit Year 7.

### **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:

Educational materials about proper management of pet waste were distributed in the Dog Waste and Surface Water Quality pamphlets at the Town Clerk's office and the Blackstone Regional Animal Shelter, and in a monthly ad in the Blackstone Enlightener.

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

Annual Requirements

*Public Education and Outreach\**

- Distributed an annual message in the spring (April/May) encouraging the proper use and disposal of grass clippings and encouraging the proper use of slow-release and phosphorus-free fertilizers
- Distributed an annual message in the summer (June/July) encouraging the proper management of pet waste, including noting any existing ordinances where appropriate
- Distributed an annual message in the fall (August/September/October) encouraging the proper disposal of leaf litter

*\* Public education messages can be combined with other public education requirements as applicable (see Appendix H and F for more information)*

*Good Housekeeping and Pollution Prevention for Permittee Owned Operations*

- Increased street sweeping frequency of all municipal owned streets and parking lots subject to Permit part 2.3.7.a.iii.(c) to a minimum of two times per year (spring and fall)

*Structural BMPs*

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

Any structural BMPs already existing or installed in the regulated area by the permittee or its agents was tracked and the phosphorus removal by the BMP was estimated consistent with Attachment 3 to Appendix F. The BMP type, total area treated by the BMP, the design storage volume of the BMP, and the estimated phosphorus removed in mass per year by the BMP were documented.

- No BMPs were installed
  - The above referenced BMP information is attached to the email submission
  - The above referenced BMP information can be found at the following publicly available website:

Total estimated phosphorus removed in **lbs/year** from the installed BMPs:

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

The Town is actively working on identifying a suitable site for installation of a structural BMP in the Blackstone River watershed.

The Town of Blackstone does not currently have any impaired water bodies with an approved TMDL for phosphorus. However, the Town does have direct discharges to water bodies that are impaired for phosphorus without an approved TMDL. Appendix H does not require permittees to estimate the amount of phosphorus removed by existing structural BMPs - that is only a requirement for permittees discharging to a waterbody with an existing TMDL for phosphorus and therefore not applicable to Blackstone.

**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:

- 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 Town of Blackstone currently has a comprehensive street sweeping plan, where the streets are swept twice a year, in the spring and in the fall. The written Street Sweeping O&M Plan to be developed in Permit Year 7 will include a schedule for targeting areas with a potential for high pollutant loads.

As the Town continues to collect data for its Catch Basin Optimization Plan, the Town will be using the data it collects to identify areas of higher sediment loading within the Blackstone River watershed, which will be incorporated into the schedule for potentially increased sweeping.

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*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:

There are 109 outfalls and 6 interconnections under Town ownership. As mapping efforts continue in Permit Year 7, the number of outfalls and interconnections will be updated as needed. The most updated list of outfalls, receiving waters and impairments is included in the most recent version of the Town's SWMP and reflects impairments included within the Final 2022 Integrated list of Waters.

## 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:Dog Waste Management Ad**

Message Description and Distribution Method:

Monthly ad in the Blackstone Enlightener encouraging dog owners to properly dispose of pet waste.

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

Information was maintained in the Blackstone Enlightener monthly throughout the permit year.

Message Date(s):

Message Completed for: Appendix F Requirements  Appendix H Requirements

Was this message different than what was proposed in your NOI? Yes  No

If yes, describe why the change was made:

#### **BMP:Stormwater Pollution Prevention Tips**

Message Description and Distribution Method:

With each water bill, the Town distributes simple tips for preventing pollutants from entering stormwater. Tips cover pet waste management, proper disposal of disposable wipes, water conservation, proper storage of snow piles, and limiting salt and de-icer use.

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

The information was mailed to 3,266 residents with water bills.

Message Date(s): Permit Year 6

Message Completed for: Appendix F Requirements  Appendix H Requirements

Was this message different than what was proposed in your NOI? Yes  No

If yes, describe why the change was made:

**BMP:Stormwater Tips for Auto Repair and Maintenance**

Message Description and Distribution Method:

A flyer outlining pollutants of concern at auto repair facilities and best management practices for preventing stormwater contamination at such facilities.

Targeted Audience: Businesses, institutions and commercial facilities

Responsible Department/Parties: DPW Operations

Measurable Goal(s):

Mailed to 14 applicable businesses in the Town in April 2024.

Message Date(s): Permit Year 6

Message Completed for: Appendix F Requirements  Appendix H Requirements

Was this message different than what was proposed in your NOI? Yes  No

If yes, describe why the change was made:

**BMP:Stormwater Pollution Prevention - Parking Lot Maintenance**

Message Description and Distribution Method:

An informational mailer outlining best management practices for parking lots and keeping common pollutants found in parking lots out of stormwater.

Targeted Audience: Businesses, institutions and commercial facilities

Responsible Department/Parties: DPW Operations

Measurable Goal(s):

Mailed to 14 applicable businesses in the Town in April 2024.

Message Date(s): Permit Year 6

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:Dog Waste and Surface Water Quality**

Message Description and Distribution Method:

Pamphlets with information regarding dog waste and its effects on stormwater quality were mailed to registered dog owners and distributed at the Town Clerk's Office and the Blackstone Regional Animal Shelter.

Targeted Audience: Residents

Responsible Department/Parties: DPW Operations/ Blackstone Animal Control

Measurable Goal(s):

Mailed to 25 registered dog owners, and made available at the Town Clerk's Office and Blackstone Regional Animal Shelter.

Message Date(s): Permit Year 6

Message Completed for: Appendix F Requirements  Appendix H Requirements

Was this message different than what was proposed in your NOI? Yes  No

If yes, describe why the change was made:

**BMP:Stormwater Pollution Prevention for Industrial Sites**

Message Description and Distribution Method:

Pamphlets with stormwater pollution prevention tips for industrial sites including erosion prevention and sediment control, dust control, eliminating unauthorized non-stormwater discharges, employee training, salt storage, spill prevention and response, and Stormwater Pollution Prevention Plans were distributed at the Building Department.

Targeted Audience: Industrial facilities

Responsible Department/Parties: DPW Operations

Measurable Goal(s):

The information was made available to all relevant parties.

Message Date(s): Permit Year 6

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:Be a Beneficial Lake Effect: Protecting Your Lake or Pond from Stormwater Pollution**

Message Description and Distribution Method:

Pamphlets with information about water quality, reducing and eliminating nutrients and bacteria in waterbodies, how stormwater pollution affects lake quality, and infiltration and sedimentation control were distributed at Town Hall.

Targeted Audience: Residents

Responsible Department/Parties: DPW Operations

Measurable Goal(s):

The information was made available to all relevant parties.

Message Date(s): Permit Year 6

Message Completed for: Appendix F Requirements  Appendix H Requirements

Was this message different than what was proposed in your NOI? Yes  No

If yes, describe why the change was made:

**BMP:Stormwater Awareness: Septic Systems**

Message Description and Distribution Method:

An informational mailer regarding septic systems, how they work, and proper maintenance.

Targeted Audience: Residents

Responsible Department/Parties: DPW Operations

Measurable Goal(s):

The information was mailed to 3,266 residents in November 2023.

Message Date(s): Permit Year 6

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:Fall Stormwater Pollution Prevention Tips**

Message Description and Distribution Method:

An informational mailer with stormwater pollution prevention tips for the fall including keeping leaf litter out of storm drains, mowing techniques and tips, fertilizer application, proper watering practices, composting clippings, and alternative landscapes.

Targeted Audience: Residents

Responsible Department/Parties: DPW Operations

Measurable Goal(s):

The information was mailed to 3,266 residents in November 2023.

Message Date(s): Permit Year 6

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 SWMP is posted and maintained on the Town's website for public review and comment.

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

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

The Town hosted an Earth Day celebration which included collection of roadside trash and a community art

project at Roosevelt Park on April 20, 2024 from 8am to 4pm.

The Town hosted a "Connect with your Community Night" at the Town Library on April 18, 2024 from 6 pm to 8 pm which included a meet-and-greet with the various boards and committees of the Town. Members of the DPW attended and distributed "Be Stormwater Smart" pamphlets with information about stormwater, how pollution enters the storm drain system, and how green infrastructure can manage the impacts of stormwater.

### 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:

The Town continues to map new outfalls, interconnections and BMPs as they are identified. The Town is actively working to meet Phase II mapping requirements. Extensive mapping efforts are planned for Permit Year 7 to identify and GPS new outfalls, interconnections, and structural BMPs, as well as catch basins, drain manholes, pipes, culverts and open channel conveyances. Catchment areas delineations will be refined after mapping efforts are completed in Permit Year 7.

#### 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:*

The Town performed a majority of their dry weather outfall screening and sampling in Permit Year 3 and screened and sampled newly identified outfalls and interconnections in Permit Year 5. The Town has not started wet weather outfall and interconnection sampling yet.

**Catchment Investigations**

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

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

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

Number of catchment investigations completed this reporting period:

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

Percent of total catchments investigated:

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

The Town will be initiating catchment investigations in Permit Year 7.

**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:**

IDDE training was conducted in December 2023.

Municipal employees attended the following additional trainings during Permit Year 6: NPDES Stormwater Webcast: Building a Local Program to Maintain Your Stormwater Practices (June 2024); eCampus Webinar Series: Common Stormwater Violations and Tips to Avoid Them (February 2024).

**MCM4: Construction Site Stormwater Runoff Control**

*Below, report on the construction site plan reviews, inspections, and enforcement actions completed **during this reporting period.***

Number of site plan reviews completed:

Number of inspections completed:

Number of enforcement actions taken:

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

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

**Ordinance or Regulatory Mechanism**

Chapter 110, Stormwater Management and Land Disturbance, of the Town of Blackstone's General Bylaws, was adopted in May 2011.

Development of supporting Rules and Regulations is ongoing, with adoption by the Planning Board planned no later than December 13, 2024. A meeting was held with the Planning Board on June 6, 2024 to discuss adoption of the Stormwater Rules & Regs.

Date update was completed (due in year 3):

Website of ordinance or regulatory mechanism:

<https://ecode360.com/15990110#15990110>

**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:

Low impact design will be required for projects requiring a Land Disturbance Permit unless infeasible in the Rules and Regulations that are planned for adoption in Permit Year 7. The Town plans to continue the review of other recommendations included as part of the Land Use Regulatory Review Memo developed during Permit Year 4 with various Town boards and commissions to identify other regulatory changes feasible for implementation.

**Green Infrastructure Report**

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

Low impact design will be required for projects requiring a Land Disturbance Permit unless infeasible in the Rules and Regulations that are planned for adoption in Permit Year 7. The Town plans to continue the review of other recommendations included as part of the Land Use Regulatory Review Memo developed during Permit Year 4 with various Town boards and commissions to identify other regulatory changes feasible for implementation.

**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):

- 1) Blackstone Town Offices
- 2) Memorial Park
- 3) Historical Museum
- 4) Blackstone Public Library
- 5) John F Kennedy Elementary School
- 6) Rathbun Street (Diana Street to Ethel Street)
- 7) Washington Street (Main St to Brown Street)
- 8) Liberty Hill Drive
- 9) Reilly Avenue (Mendon Street to Kimberly Lane)
- 10) Mendon Street at Lincoln Street
- 11) Summer Street (Rennie Drive to Blackstone Street)
- 12) Rocco Drive

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.

**MCM6: Good Housekeeping**

**Catch Basin Cleaning**

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

Number of catch basins inspected:

Number of catch basins cleaned:

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

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

Total number of catch basins:

*If applicable:*

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

**Street Sweeping**

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

- Number of miles cleaned:
- Volume of material removed:  [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:

3 site inspections were completed at each facility requiring a SWPPP, the DPW Facility and the Recycling Center.

**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:

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### **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.

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## **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]*