

Year 3 Annual Report
Massachusetts Small MS4 General Permit
Reporting Period: July 1, 2020-June 30, 2021

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, 2020 and June 30, 2021 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 (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.

Year 3 Requirements

- Inspected and screened all outfalls/interconnections (excluding Problem and Excluded outfalls)
- Updated outfall/interconnection priority ranking based on the information collected during the dry weather inspections as necessary
- Post-construction bylaw, ordinance, or other regulatory mechanism was updated and adopted consistent with permit requirements

Optional: If you would like to describe progress made on any incomplete requirements listed above, provide any additional information, and/or if any of the above year 3 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:

Due to COVID-19, the City was unable to continue its intern program, which assists in implementation of the IDDE Program, including outfall investigations. To date, more than 300 outfalls have been field verified and some inventory and dry weather screening information collected. The City intends to hire a consultant to continue making progress with outfall investigations and water quality sample analysis. The City intends to continue with outfall investigations and updating the outfall/interconnection priority ranking as necessary in Permit Year 4.

Title 13 Article IV of Woburn's Municipal Code addresses Stormwater Management of New Development and Redevelopment. While this Ordinance meets many of the requirements of the 2016 General Permit, modifications will be necessary to the Ordinance. This Ordinance refers to the Massachusetts Stormwater Handbook, which is being updated. The City plans to address this in Permit Year 4 with assistance from MAPC.

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 website:
- Properly stored and disposed of catch basin cleanings and street sweepings so they did not discharge to receiving waters
- Provided training to employees involved in IDDE program within the reporting period
- All curbed roadways were swept at least once within the reporting period
- Updated system map due in year 2 as necessary
- 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, provide any additional information, and/or if any of the above annual 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:

Applicable City employees attend trainings throughout the year, but an IDDE-specific training was not completed in Permit Year 3.

The system mapping is updated as routine drainage system field work, catch basin cleaning efforts, and outfall inspections are completed.

The City has a partial inventory of municipal properties available from the Assessing Department. There is a parks & recreation inventory from the Woburn Recreation Department, including a WebGIS map that describes the different amenities available at various parks around the City. A vehicles & equipment inventory is available from the DPW. The City anticipates formalizing the O&M inventories for municipal properties in Permit Year 4.

Standard O&M SOPs and best practices are followed for City facilities, infrastructure, parks, and treatment structures. The City anticipates formalizing the O&M program in Permit Year 4.

Some of the City's treatment structures were inspected in Permit Year 3, including the water quality structure at the Public Works facility. Maintenance is completed at BMPs as needed.

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

** 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 has very few properties that remain on private septic systems. Prior to road paving projects, the DPW notifies any septic system owners along the street to be paved of the potential for a new connection to the City sewer system. The DPW identifies these property owners via the sewer billing system and mails letters as applicable.

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)

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.

- 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:

Since 2017, a few new City-owned stormwater BMPs/treatment units have been installed in the Aberjona River and Horn Pond watersheds, including the Main Street parking lot and Clapp Park rain gardens. Phosphorus removal calculations were not completed in Permit Year 3 but will be estimated using available design plans, stormwater reports, and applicable EPA guidance in Permit Year 4.

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:

Per the 2016 Massachusetts Integrated List of Waters, turbidity was removed as an impairment for Aberjona River (MA71-01) because the water quality standard was attained. The requirements of Appendix H, Part V are no longer applicable for Woburn. In accordance with Appendix H, Part V.4.b., the City will document in the SWMP the date of this determination and date of EPA concurrence.

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:Bag Your Leaves

Message Description and Distribution Method:

City web site and social media post about proper disposal of leaves and other yard waste focused on fall yard clean-ups.

<https://www.woburnma.gov/news/2020/10/bag-your-leaves/>

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

Distribute a minimum of two (2) educational messages spaced at least a year apart. The Facebook post received 7 likes, Twitter post received two likes. Information was also shared by the news website "Patch."

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:Can the Grease

Message Description and Distribution Method:

City web site and social media post concerning FOG and proper disposal of household cooking fats and grease, focused on holiday cooking.

<https://www.woburnma.gov/news/2020/12/can-the-grease/>

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

The Facebook post received one like and one share.

Message Date(s): December 22, 2020

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: Catch Basin Cleaning in Woburn

Message Description and Distribution Method:

City web site and social media post about annual catch basin cleaning operations in the City, targeted at educating residents and other viewers about how and why we clean catch basins.

<https://www.woburnma.gov/news/2021/03/catch-basin-cleaning-in-woburn/>

Targeted Audience: Residents

Responsible Department/Parties: Engineering

Measurable Goal(s):

Distribute a minimum of two (2) educational messages spaced at least a year apart. The Facebook post received 8 likes.

Message Date(s): March 1, 2021

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: Bag Your Leaves

Message Description and Distribution Method:

City web site and social media post about proper disposal of leaves and other yard waste focused on spring yard clean-ups.

<https://www.woburnma.gov/news/2021/03/bag-your-leaves-2/>

Targeted Audience: Residents

Responsible Department/Parties: Engineering

Measurable Goal(s):

Distribute a minimum of two (2) educational messages spaced at least a year apart. The Facebook post received 3 likes, Twitter post received 2.

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:Spring Lawn Care and Water Quality

Message Description and Distribution Method:

City web site and social media post about lawn and garden fertilizers and their impacts on water quality.
<https://www.woburnma.gov/news/2021/04/spring-lawn-care-and-water-quality-2/>

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

Distribute a minimum of two (2) educational messages spaced at least a year apart. The Facebook post received 3 likes.

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:What do you do with grass clippings?

Message Description and Distribution Method:

City web site and social media post about proper disposal or mulching and grass clippings and the impact on water quality.
<https://www.woburnma.gov/news/2021/06/what-do-you-do-with-grass-clippings/>

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

Distribute a minimum of two (2) educational messages spaced at least a year apart. The Facebook post received 3 likes and 1 share.

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: The problem with pet waste

Message Description and Distribution Method:

City web site and social media post about pet waste and the impact of pet waste on water quality.
<https://www.woburnma.gov/news/2021/06/the-problem-with-pet-waste/>

Targeted Audience: Residents

Responsible Department/Parties: Engineering

Measurable Goal(s):

Distribute a minimum of two (2) educational messages spaced at least a year apart. Facebook post received 2 likes.

Message Date(s): June 24, 2021

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: Remember to check your construction site erosion controls regularly!

Message Description and Distribution Method:

Social media post shared from Think Blue Massachusetts targeted toward contractors concerning proper construction site erosion controls.

Targeted Audience: Developers (construction)

Responsible Department/Parties: Engineering

Measurable Goal(s):

Facebook post received 1 like and was shared by the organization "Think Blue Massachusetts."

Message Date(s): June 24, 2021

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:Defend Your Drains

Message Description and Distribution Method:

Social Media post (Facebook) shared from Think Blue Maine targeted towards residents about how stormwater drains are separate from the sewer system.

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

Facebook post received 5 likes.

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:

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 posted on the City's website and available for public review and comment. Additionally, social media posts in Permit Year 3 included links to Woburn's stormwater information hub, which includes extensive educational materials, resources, and SWMP documents.

As part of the ongoing MVP Action Grants, City staff engage and educate the public about targeted stormwater concerns.

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

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

The Conservation Commission usually sponsors Conservation Day, which is a clean up around Horn Pond. Due to COVID-19, Conservation Day could not be held in May 2021 as expected. However, additional cleanup events were held in the City in Permit Year 3:

- Friends of the Middlesex Canal hosted a Middlesex Canal Cleanup Day on May 15, 2021.
- Woburn United Methodist Church hosted a Woburn Community Cleanup on April 17, 2021.

The City had Christmas tree curbside pickup from January 4 to January 8 and January 11 to January 15, 2021. Yard waste is collected by the City during spring, summer, and fall.

The City allows residents to dispose of wastes, such as residential waste oil, car tires/batteries, mercury bearing wastes, and propane tanks, at specified locations on specific dates.

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

Optional: Provide additional status information regarding your map:

On-going map maintenance activities are performed as map discrepancies are found 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. Please also include the updated inventory and ranking of outfalls/interconnections based on monitoring results.

- No outfalls were inspected
- 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 outfalls/interconnections screened **to date**.

Percent of outfalls screened:

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

Due to COVID-19, the City was unable to continue its intern program, which completes IDDE field work. In PY1 the City reported 25% of outfall screening was complete (109 outfalls). Once the City is able to continue with outfall investigations, a first step will be to review screening considered complete under the 2016 General Permit vs. investigations remaining.

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 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:

Due to COVID-19, the City was unable to continue its intern program, which completes IDDE field work.

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 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:**

Applicable City employees attend trainings throughout the year, but an IDDE-specific training was not completed in Permit Year 3. DPW staff attended training on culvert assessment and drainage and roadway maintenance and reconstruction via virtual classroom offerings by the Bay State Roads Program.

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:

While formal enforcement actions were not taken in Year 3, the DPW worked with contractors to require the installation of erosion controls on some construction sites as needed.

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

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

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 of 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 of 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 of the Retrofit Properties Inventory has not yet begun as this requirement is due in Permit Year 4. The City will be partnering with the Mystic River Watershed Association (MyRWA) to evaluate potential retrofit sites in Permit Year 4.

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:

Issues that were identified during the initial SWPPP inspection of the Public Works facility (proper stockpiling and material storage) were corrected and BMPs are followed and maintained. No additional corrective actions were needed.

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:

The City applied for a Municipal Vulnerability Preparedness (MVP) Action Grant and received \$325,000 in FY21 for the Restoration of Horn Pond Brook. The project involves reducing localized flooding and improving fish habitat.

The City also applied for a Municipal Vulnerability Preparedness (MVP) Action Grant and received \$145,445 in FY20 for the Restoration of Horn Pond Brook. The project involves expanding the Shaker Glen conservation area, de-paving and restoring wetlands, improving water quality, and alleviating urban flooding.

COVID-19 Impacts

Optional: If any of the above year 3 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:

COVID-19 impacts have been discussed throughout the report.

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

Yes, I agree

- Develop a report assessing current street design and parking lot guidelines and other local requirements within the municipality that affect the creation of impervious cover
- Develop a report assessing existing local regulations to determine the feasibility of making green infrastructure practices allowable when appropriate site conditions exist
- Identify a minimum of 5 permittee-owned properties that could potentially be modified or retrofitted with BMPs to reduce impervious areas

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)

Provide any additional details on activities planned for permit year 4 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: Title:

Signature: Date:

[Signatory may be a duly authorized representative]