

**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>

<b>Impairment(s)</b>			
<input checked="" type="checkbox"/> Bacteria/Pathogens	<input type="checkbox"/> Chloride	<input type="checkbox"/> Nitrogen	<input checked="" type="checkbox"/> Phosphorus
<input checked="" type="checkbox"/> Solids/ Oil/ Grease (Hydrocarbons)/ Metals			
<b>TMDL(s)</b>			
<i>In State:</i>	<input type="checkbox"/> Assabet River Phosphorus	<input checked="" type="checkbox"/> Bacteria and Pathogen	<input type="checkbox"/> Cape Cod Nitrogen
	<input type="checkbox"/> Charles River Watershed Phosphorus	<input type="checkbox"/> Lake and Pond Phosphorus	
<i>Out of State:</i>	<input type="checkbox"/> Bacteria/Pathogens	<input type="checkbox"/> Metals	<input type="checkbox"/> Nitrogen
			<input type="checkbox"/> Phosphorus
<input type="button" value="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:

The Stormwater Regulations to accompany the Town's Stormwater Management Bylaw are in draft format and awaiting final review and approval by Town Counsel and the Bedford Select Board. The anticipated release of the updated Stormwater Management Handbook by MassDEP, as well as staff turnover (including Conservation Administrator and Town Engineer) prompted a delay to the original timeline for adopting the regulations. The Regulations are intended to be adopted in Permit Year 4, regardless of the delayed Handbook, and will also be accompanied by a revision to the Town's Wetlands Regulations through the Conservation Commission (currently also in draft format).

### 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:

The opportunity for a public hearing was delayed due to the delay in adopting the Stormwater Management Regulations as noted on page 2, which would have been through the public meeting process with the required public notice. The Stormwater Management Plan and Annual Reports are available on the Stormwater Management Program website and the public is encouraged to send feedback to the stormwater email address listed on the website and included in publications.

Inspection of above-ground treatment structures is not yet complete but was started in late August 2021. The BMP inspection form was changed from paper to electronic format for improved access and data management through PeopleForms on tablets. Inspection of below-ground treatment structures has been delayed due to staffing shortages/turnover and equipment repairs that are ongoing. All structures will be inspected in Permit Year 4 as required.

## **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:*

**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:*

The Town took ownership of a new vacuum sweeper in July of 2020. The entire town was swept once with the new vacuum sweeper, and additional street sweeping was conducted on main roads, after storm debris accumulation, and for various public events. With increased staffing levels, the Town plans to increase street

sweeping to twice per year in Permit Year 4.  
The Town has confirmed two new BMPs were installed in the regulated area as part of the MassDOT project for the widening of Middlesex Turnpike (still under construction). Following receipt of design calculations, the estimated phosphorus removal will be calculated and reported in Permit Year 4.

**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

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:

See page 4 for street sweeping details.

*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:

The MS4 outfall mapping was updated based on IDDE field investigations completed in FY21. The updated inventory lists receiving waters for each location. There were no changes to the list of applicable TMDL or impaired waters requirements for the Town.

Following release of the final Massachusetts Year 2018/2020 Integrated List of Waters, any necessary revisions will be updated and included in the Annual Report.

## 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: Special Events**

Message Description and Distribution Method:

Distributed rolls of pet waste bags at Recycle Events held on Saturdays in the fall and continued weekly on Wednesdays during regular business hours at the Town's Compost, Storage & Recycling Center. Displayed sign on site with public message that pet waste pollutes our rivers, lakes & streams. Also advertised "Pet Waste Bags Available" on Town of Bedford MA social media.

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

Distributed 500 rolls of pet waste bags. Town's Facebook page has over 2,900 followers. October 8, 2020 posting had 3,611 view on Facebook and 890 views on Twitter, with reminder on November 30 having 531 views.

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: Newspaper Article/Press Release**

Message Description and Distribution Method:

Posted articles in Town's online newspaper regarding yard waste collection, noting the EPA Stormwater Permit and urging proper disposal of leaves and yard waste as they are a source of stormwater pollution.

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

Four separate articles published in The Bedford Citizen, which has over 2000 email subscribers, 2500

Facebook followers, and 1600 Twitter followers.

Message Date(s): September 29, 2020; November 4, 2020; January 13, 2021; June 23, 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: Webpage**

Message Description and Distribution Method:

Posting on Code Enforcement website and Stormwater Management Program website with PDF of poster "Best Management Practices for Stormwater Management" which includes photographs of good and bad practices for maintaining BMPs and notes both the EPA website for NPDES Stormwater information and the Town of Bedford Stormwater Management Team email address.

Targeted Audience: Developers (construction)

Responsible Department/Parties: Building Permitting and Enforcement

Measurable Goal(s):

The website counters show approximately 211 clicks.

Message Date(s): November 12, 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: Brochure/Pamphlet**

Message Description and Distribution Method:

A direct mailing to septic system owners including EPA's infographic "Do Your Part. Be Septic Smart!" on proper maintenance of systems, including cover letter referencing the Town's Stormwater Management Program with website link and email address for any questions.

Targeted Audience: Residents & Businesses

Responsible Department/Parties: DPW & Health Department

Measurable Goal(s):

Direct mailing to 131 recipients shown on Town records as having an active on-site septic system.

Message Date(s): August 20, 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: Newspaper Article/Press Release**

Message Description and Distribution Method:

The Town participated in the Community Program with the Great American Rain Barrel Company. Distributed residential mailer regarding availability of rain barrels for purchase, "Reduce Pollution from Stormwater Right in Your Yard and Save Money at the Same Time!", along with article in online newspaper "Help Your Garden Grow & Conserve Water with DPW Rain Barrel".

Targeted Audience: Residents

Responsible Department/Parties: DPW Engineering & Recycling

Measurable Goal(s):

124 Rain Barrels were purchased by Bedford residents. The March 8 Facebook post has 719 views and Twitter had 423 views. A reminder on April 5 had 429 views.

Message Date(s): March 5, 2021 (Newspaper Article); March 8, 2021 (Social Media Posting)

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:

Surrounding Towns were participating in the same program and Bedford residents were interested.

### **BMP: Brochure/Pamphlet**

Message Description and Distribution Method:

Color cardstock postcard was mailed directly to property owners and tenants. The following messages were included: What Is Stormwater?, Hazardous Waste Disposal & hotline, Maintenance of Dumpsters/Litter, Use of Sand/Salt, Disposal of Yard Waste, Use of phosphorus-free fertilizer, Maintenance of Grease Traps.

Targeted Audience: Businesses, institutions and commercial facilities

Responsible Department/Parties: DPW Operations & Engineering

Measurable Goal(s):

Mailed two-sided postcard to 147 business, commercial, industrial property owners in Bedford

[Empty text box]

Message Date(s): May 4, 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:

[Empty text box]

**BMP: Brochure/Pamphlet & Press Release**

Message Description and Distribution Method:

Direct mailer to residents and email distribution list to businesses with message "Fertilize Wisely! Be the Solution to Stormwater Pollution!" which included a message to alert professional landscape companies to learn about how their efforts affect the quality of rivers and streams. Noted grass clippings should not be left on pavement; fertilizers should be used sparingly and never before predicted rain storms; avoid over-watering and use organic, slow-release or phosphorus-free fertilizers.

Targeted Audience: Residents, Businesses

Responsible Department/Parties: DPW Engineering/Recycling & Economic Development Director

Measurable Goal(s):

Resident mailer, including schedule for Compost & Recycling Center was sent to 4500 recipients. Economic Development Director email distribution list from Constant Contact was sent to Bedford Chamber of Commerce including 832 email addresses (business contacts and employees).

Message Date(s): May 26, 2021 (email) & June 11, 2021 (mailer)

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:

[Empty text box]

**BMP: Brochures/Pamphlets**

Message Description and Distribution Method:

A revised version of the full-color, tri-fold brochure "Pet Waste Pollutes...We need your help!" was mailed to dog owners with their license renewal information. The brochure references the bylaws, notes pet waste belong in the trash, and educated the public on pet waste as a major source of water contamination as it contains harmful bacteria and parasites.

Targeted Audience: Residents

Responsible Department/Parties: DPW & Town Clerk

Measurable Goal(s):

600 tri-fold color brochures mailed directly to dog owners in Bedford.

Message Date(s): June 3, 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:

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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 public has access to the Town's Stormwater Management website and all posted materials, as well as an email address to provide any questions, comments or concerns about stormwater matters, however a formal opportunity for the public to be involved in the Stormwater Management Program was not provided in Permit Year 3. Due to delays in adopting the Stormwater Management Regulations and staff turnover, the timeline to hold a public hearing has been moved to Permit Year 4.

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:**

Although there were no formal opportunities for public participation, as noted above under MCM1: Public Education, in Permit Year 3, the Town did increase the number and frequency of stormwater messages to the general public using both traditional direct mail and social media platforms.

## 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:*

The MS4 drainage outfall map has been updated to reflect changes found during IDDE field investigations and is posted to the Town's Stormwater Management Program website.

### **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:*

### **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:*

There are no known Problem Catchments. Catchment investigations are scheduled to begin in Permit Year 4.

### **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:*

No illicit discharges were found as defined by the Permit, however dry weather sampling indicated a few catchments that need further investigation in Permit Year 4.

### **Employee Training**

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

The Town's consultant finalized a PowerPoint training video that was distributed on June 23, 2021 to all DPW Operations Managers for viewing by their individual departments. The video lasts approximately 20 minutes and covers Stormwater Best Practices.

**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**

**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, but will be completed in Permit Year 4 as required.

**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, but will be completed in Permit Year 4 as required.

### **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:

The Retrofit Properties Inventory has not yet begun, but will be completed in Permit Year 4 as required.

## **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:

Trash and cardboard scattered by high wind/storm events was cleaned up around dumpsters at the DPW facility. The cardboard dumpster for use by the public was relocated to a fenced in location.

**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:

### **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 related impacts were noted above in the applicable sections.

### **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:

The Town of Bedford acknowledges the Permit Year 4 requirements and will complete as many as possible based on funding and staff availability.

## 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]*