

**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:

N/A

- 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 has posted the Stormwater Management Plan (SWMP) on their website for public access; however, they have not provided notice of its availability per State Public Notice requirements. The Town will provide the public with an opportunity to comment on the SWMP and notify the public in accordance with State Public Notice requirements during the Permit Year 7 cycle.

The Town completed IDDE, Good Housekeeping and Pollution Prevention, and SWPPP trainings to applicable staff on March 13, 2024.

### **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:

The Town does not have any direct MS4 discharges to bacteria/pathogen impaired waterbodies. However, the above mentioned educational materials were distributed in Permit Year 6.

### **Nitrogen** (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) that encourages the proper use and disposal of grass clippings and encourages the proper use of slow-release 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)

*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)

*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 identified a future retrofit project at Walkers Pond Landing in the Walkers Pond and Lower Mill Pond Phosphorus Source Identification Report completed in PY5. The retrofit work has been designed and is planned to be constructed in PY7. No other structural BMPs exist in catchments discharging to phosphorus impaired waterbodies.

---

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

The Brewster Department of Public Works posted public announcements for proper leaf litter handling, the effects of fertilizer use, and know before you mow to inform the public about best housekeeping practices. These news posts can be found on the Town of Brewster website here: <https://www.brewster-ma.gov/node/1486/news>

### 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 Town of Brewster evaluated the "Final Massachusetts Integrated List of Waters for the Clean Water Act 2022 Reporting Cycle" and found that no changes related to receiving waters/impaired or TMDL waters have been made during this reporting period. The Town will reevaluate when the "2024/2026 Integrated List of Waters" is made public in Fall 2025.

The Town continues to perform opportunistic catchment investigations during the course of infrastructure related work throughout the Town.

## 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: Proper Leaf Litter Handling**

Message Description and Distribution Method:

The Brewster Department of Public Works posted a public announcement on the Town of Brewster website on October 17, 2023 titled "Don't Just 'Leaf' Your Leaves!". The goal of this announcement was to inform the public about how to properly handle and dispose of yard leaf litter during the Fall season. The post also educated the public on the impacts of leaf litter entering roads and catch basins on water quality, including the increase in nitrogen and phosphorus loading. The post can be found on the Town's website here: <https://www.brewster-ma.gov/department-public-works/news/proper-leaf-litter-handling>

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

Inform the public on how to handle leaf litter and the impacts leaf litter has on water quality when not properly handled.

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: Know Before You Mow**

Message Description and Distribution Method:

The Brewster Department of Public Works posted a public announcement on the Town of Brewster website on May 6, 2024 titled "Know Before you Mow". The goal of this announcement was to inform the public about the impacts of lawn waste on the water quality and the Town's drainage system. The post informed the public that grass clippings that enter the street can clog catch basins, damage the drainage system, and cause flooding. The post also linked to a PDF with further information about the proper disposal of lawn waste to prevent stormwater pollution. The post can be found on the Town's website here: <https://www.brewster-ma.gov/department-public-works/news/know-you-mow-0>

Targeted Audience: Residents

Responsible Department/Parties: Department of Public Works

Measurable Goal(s):

To inform the public about the impacts of lawn waste on water quality and the Town's drainage system and how to properly dispose of lawn waste to prevent these impacts.

Message Date(s): May 6, 2024

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 Effects of Fertilizer Use**

Message Description and Distribution Method:

The Brewster Department of Public Works posted a news announcement titled "The Effects of Fertilizer Use" on the Town of Brewster's website on May 1, 2024. The goal of the announcement was to inform the public that stormwater can carry fertilizer into waterbodies and cause algal blues and impact wildlife. The post also included a link to a PDF that further detailed how fertilizer can deposit excess nutrients into waterbodies. The can be found on the Town's website here: <https://www.brewster-ma.gov/department-public-works/news/effects-fertilizer-use-0>

Targeted Audience: Residents

Responsible Department/Parties: Department of Public Works

Measurable Goal(s):

To inform the public on the impacts of fertilizer on waterbody nutrient loading and how they can reduce their fertilizer use to improve water quality.

Message Date(s): May 1, 2024

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: Household Hazardous Waste Collection Days**

Message Description and Distribution Method:

The Brewster Board of Health posted the a schedule for hazardous waste collection days on the Town of

Brewster website. The post informed the public of the upcoming collection days and what materials are considered household hazardous waste. The schedule includes six (6) dates from May to October where the public can bring hazardous waste for proper disposal. The post can be found on the Town's website here: <https://www.brewster-ma.gov/board-health-and-health-department/news/household-hazardous-waste-collection-days>

Targeted Audience: Residents

Responsible Department/Parties: Board of Health

Measurable Goal(s):

To inform the public of the household hazardous waste collection schedule and what materials are considered hazardous waste.

Message Date(s): April 2, 2024

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: Social Media Post - Dogs Prohibited from Ponds & Beaches**

Message Description and Distribution Method:

On May 18, 2024 the Town of Brewster posted a notification on their Facebook page that dogs, horses and pets are prohibited from public ponds, landings, beaches and tidal flats from May 15 until September 15.

Targeted Audience: Residents

Responsible Department/Parties: Town of Brewster

Measurable Goal(s):

To inform the public that no pets are allowed on public beaches, ponds, landings, or tidal flats during summer months.

Message Date(s): May 18, 2024

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: Intermunicipal Shoreline Management for Southeastern Cape Cod Bay**

**Message Description and Distribution Method:**

On June 25, 2024 members of the Center for Coastal Studies presented the framework for the Intermunicipal Shoreline Management for Southeastern Cape Cod Bay, an agreement between the Towns of Brewster, Dennis, and Orleans to work together to preserve their shared coastline. The presentation detailed how the communities would make a "science-based framework for managing the 14.5 mile shoreline between Rock Harbor in Orleans and Bass Hole in Dennis". This project will concentrate on managing the effects of stormwater runoff on coastal erosion, water quality, flood prevention, and natural habitat protection. This agreement will ensure the three communities can work together to better achieve the goal of coastline protection.

Targeted Audience: Residents

Responsible Department/Parties: The Center for Coastal Studies, the Town of Brewster

**Measurable Goal(s):**

To educate the residents of Brewster, Dennis, and Orleans on how the three municipalities are working together to preserve their shared coastline and manage stormwater.

Message Date(s): June 25, 2024

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 Town of Brewster posted the June 2023 Stormwater Management Plan to the Town's website. The Department of Public Works contact information, including phone number, email address, and mailing address, are available on the website to solicit public comments on the SWMP.

The Town of Brewster did not receive any comments on the Stormwater Management Plan in Permit Year 6.

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 of Brewster held the "Beautify Brewster" clean up event on April 27, 2024. The event, held on Earth Day, encouraged members of the public to clean up litter from Brewster. The Department of Natural Resources posted an announcement of the event on the Town's website here: <https://www.brewster-ma.gov/>

natural-resources-harbormaster-shellfish/news/beautify-brewster-saturday-april-27-2024

### 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 Phase II map was updated in PY6 to include data from Brewster's dry weather outfall screening and catchment investigations. This information will be evaluated annually and updated as needed.

#### 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 outfall screening data attached includes some inspections that occurred in PY5 (May 2023); however, the

8 outfalls screened were all conducted during the PY6 time period. The Town of Brewster has 17 identified outfalls. During inspections in May and July of 2023 3 of these outfalls could not be located for inspection and 1 was determined to not be an outfall.

**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 of Brewster conducted dry weather catchment investigations in September of 2023.

**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:**

Woodard & Curran conducted a training course with staff at the Brewster Department of Public Works (DPW) on March 13, 2024. The goal of the training was to familiarize DPW staff with the Town's Stormwater Management Plan and the control measures outline within the Plan. 15 total DPW staff members completed the training course.

**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**

Date update was completed (due in year 3):

Website of ordinance or regulatory

mechanism:

stormwater\_management\_guidance\_document\_041423.pdf

**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:

1 as-built reviewed for the stormwater drainage facilities installed at the Town of Brewster Planning Department.

**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:

The Town of Brewster prepared a regulatory assessment report to determine how the Town's existing street and parking lot guidelines impact the creation of impervious cover. This report was completed during PY5, no additional work occurred during PY6. A copy of that regulatory assessment report is available at the Brewster Department of Public Works

**Green Infrastructure Report**

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

The Town of Brewster completed a report to assess their existing regulations impact on making green infrastructure available. This report was completed in PY5, no additional work occurred during PY6. A copy of this report is available at the Brewster Department of Public Works.

**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):

Two (2) sites were studied for future BMP retrofits in PY6. Cahoon Road runs adjacent to Smalls Pond and Black Pond in Brewster. Under existing conditions this roadway does not have a closed drainage system or curbing, allowing roadway runoff to enter the adjacent ponds untreated. The proposed BMP retrofit would install catch basins along Cahoon Road to capture runoff and direct it to either a vegetated swale or infiltration trench. Further investigation of the groundwater table will determine which BMP would be a best fit in this location. The second retrofit location is Long Pond Road (Route 137) in Brewster, which runs adjacent to Mill

Pond and Cahoon Pond. The proposed BMP work would retrofit existing catch basins on Long Pond Road into a leaching system to store and infiltrate runoff. Additionally, an infiltration basin is proposed at a natural low point at the intersection of Long Pond Road and Old Long Pond Road with a deep sump catch basin to provide pretreatment.

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.

A retrofit project at Walkers Pond has been designed and permitted and is currently out to bid.

### **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:

The Town of Brewster cleaned and inspected 965 Town owned and 82 privately owned catch basins in PY6 for a total of 1,047 catch basins cleaned and inspected. The 148.11 tons of material removed includes waste from the 82 privately owned catch basins.

**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:

Woodard & Curran staff observed ponding and petroleum runoff at the Brewster Transfer Station during the Q3 2023 SWPPP inspection. Efforts were made to contain fuel runoff at the Transfer Station, resulting in an elimination of the point source. Excess debris was observed at the DPW Yard during the Q1 2024 inspection. The debris was removed from the DPW Yard. Erosion from vehicle washing was observed at the DPW Yard was also observed during the Q1 2024 inspection. The Town placed crushed stone in eroding areas, eliminating the erosion source.

**Additional Information**

**Monitoring or Study Results**

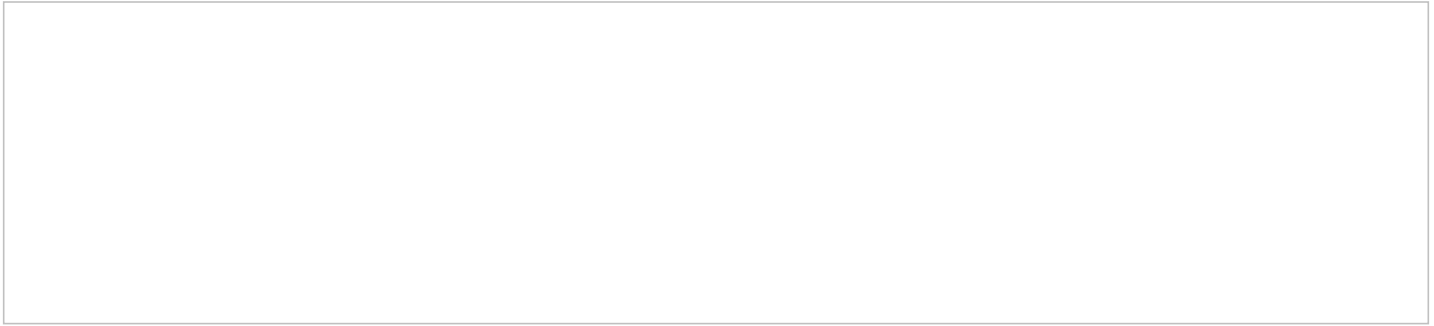
*Results from any other stormwater or receiving water quality monitoring or studies conducted during the reporting period not otherwise mentioned above, where the data is being used to inform permit compliance or permit effectiveness must be attached.*

- 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:

**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.



## 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:

The Town identified a future retrofit project at Walkers Pond Landing in the Walkers Pond and Lower Mill Pond Phosphorus Source Identification Report completed in PY5. The retrofit work has been designed and is planned to be constructed in PY7.

## 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]*