

Year 5 Annual Report

Massachusetts Small MS4 General Permit

Reporting Period: July 1, 2022-June 30, 2023

*****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, 2022 and June 30, 2023 unless otherwise requested.

Part I: Contact Information

Name of Municipality or Organization: Town of Concord

EPA NPDES Permit Number: MAR041187

Primary MS4 Program Manager Contact Information

Name: Steve Dookran

Title: Town Engineer

Street Address Line 1: 133 Keyes Road

Street Address Line 2: 2nd Floor

City: Concord

State: MA

Zip Code: 01742

Email: sdookran@concordma.gov

Phone Number: (978) 318-3210

Stormwater Management Program (SWMP) Information

SWMP Location (publicly available web address): <https://www.concordma.gov/3398/Stormwater-Management-Plan>

Date SWMP was Last Updated: June 30, 2023

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:

<https://www.concordma.gov/DocumentCenter/View/44607/Concord-Stormwater-Management-Plan---2023>

- ☒ Updated system map due in year 2 as necessary
☒ Provided training to employees involved in IDDE program within the reporting period
☒ Properly stored and disposed of catch basin cleanings and street sweepings so they did not discharge to receiving waters
☒ All curbed roadways were swept at least once within the reporting period
☒ Enclosed all road salt storage piles or facilities and implemented winter road maintenance procedures to minimize the use of road salt

- ☒ Implemented SWPPPs for all permittee owned or operated maintenance garages, public works yards, transfer stations, and other waste handling facilities
- ☒ Updated inventory of all permittee owned facilities as necessary
- ☒ O&M programs for all permittee owned facilities have been completed and updated as necessary
- ☒ Implemented all maintenance procedures for permittee owned facilities in accordance with O&M programs
- ☒ Implemented program for MS4 infrastructure maintenance to reduce the discharge of pollutants
- ☐ Inspected all permittee owned treatment structures (excluding catch basins)

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

The Town of Concord has engaged the services of an engineering consultant to carry out an analysis and formulate a plan for the implementation of a Stormwater Utility program. Currently, the Town is in the process of drafting an Article for the April 2024 Town Meeting, with the aim of officially adopting this Stormwater Utility initiative. Once established, this utility will play a crucial role in providing funding to meet all obligations outlined in the MS4 permit.

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:

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

- Completed the evaluation of all permittee owned properties identified as presenting retrofit opportunities or areas for structural BMP installation under permit part 2.3.6.d or identified in the
- ☒ Phosphorus Source Identification Report, including: *(select the items of the evaluation that have been completed below)*
- ☒ Next planned infrastructure, resurfacing, or redevelopment activity planned for the property (if applicable) OR planned retrofit date
 - ☒ Estimated cost of redevelopment or retrofit BMPs
 - ☒ Engineering and regulatory feasibility of redevelopment or retrofit BMPs
- ☒ Completed a listing of planned structural BMPs and a plan and schedule for implementation
- ☐ The BMP list and implementation schedule is attached to the email submission
 - ☒ The BMP list and implementation schedule can be found at the following publicly available website:
https://www.concordma.gov/DocumentCenter/View/44523/Concord-Phosphorus-Source-Identification-and-Potential-Structural-BMP-Report_Draft

- 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:

https://www.concordma.gov/DocumentCenter/View/44523/Concord-Phosphorus-Source-Identification-and-Potential-Structural-BMP-Report_Draft

Total estimated phosphorus removed in **lbs/year** from the installed BMPs: 0.96

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:

Street sweeping: In the business district and some parking lots, street sweeping occurred at a higher frequency, once a week from May-November.

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 Town identified multiple structures that are not MS4 outfalls in the process of inspecting and screening outfalls in Permit Year 3. The outfall inventory was updated and documented in the outfall / interconnection priority ranking. Additionally, the list of impairments to receiving waters was updated based on the most recent version of the Integrated List of Waters. These changes are reflected in the updated SWMP, resubmitted July 30, 2021.

In Year 4, the Town visited fourteen the locations of fourteen previously identified interconnections. During the field observations, the Town determined that these locations are not interconnections, they do not require sampling, and they will be removed from the outfall/interconnection priority ranking. Additionally, the list of impairments to receiving waters was updated based on the most recent version of the Integrated List of Waters, which is the 2018/2020 Integrated List of Waters approved by EPA on February 2, 2022.

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: 10

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:MS4 General Messaging Brochure

Message Description and Distribution Method:

Brochures with general MS4 information distributed to 1330 homeowners at the following locations: Alford Cir, Ayershire Ln, Macmillan Dr, Mattison Dr, College Rd, Commonwealth Ave, Hildreth Ln, Prairie St, Stacey Cir, Winthrop St. Brochure included a QR code linking to the Town website for additional MS4 information.

Targeted Audience: Residents

Responsible Department/Parties: Engineering

Measurable Goal(s):

Distribute a minimum of two educational messages over the permit term (5 years)

Message Date(s): 02/01/2023

Message Completed for: Appendix F Requirements ☐ Appendix H Requirements ☐

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

If yes, describe why the change was made:

BMP:Stormwater Outreach (Septic System Maintenance) on Town Website

Message Description and Distribution Method:

Stormwater outreach information covering lawn care, pet waste, septic tanks, non-point pollution source and stormwater runoff and more posted to Concord's website. The septic system information is included in the following flyers that are linked from the Health Department webpages:

- "Septic Betterment Loan Program"
- "Buying or Selling Property with a Septic System"
- "Protect Your Family's Health: A Guide to Water Quality Testing for Private Wells"
- "Title 5 Building Review"

Targeted Audience: Residents

Responsible Department/Parties: CPW

Measurable Goal(s):

Distribute annual messaging in accordance with the Town's Bacteria/Pathogens impairment requirements

Message Date(s): Ongoing

Message Completed for: Appendix F Requirements ☒ Appendix H Requirements ☒Was this message different than what was proposed in your NOI? Yes ☐ No ☒

If yes, describe why the change was made:

BMP:Spring Messaging

Message Description and Distribution Method:

"Don't Trash the Grass" brochure posted on the Town Stormwater Website

Targeted Audience: Residents

Responsible Department/Parties: Engineering

Measurable Goal(s):

Deliver annual messaging on applicable items in permit Appendix H and F.

Message Date(s): Ongoing

Message Completed for: Appendix F Requirements ☒ Appendix H Requirements ☒Was this message different than what was proposed in your NOI? Yes ☐ No ☒

If yes, describe why the change was made:

BMP:Spring Messaging

Message Description and Distribution Method:

"Do Your Civic Doody" proper pet waste disposal brochure on Town Website

Targeted Audience: Residents

Responsible Department/Parties: Engineering

Measurable Goal(s):

Distribute annual message of proper pet waste disposal.

Message Date(s): Ongoing

Message Completed for: Appendix F Requirements ☒ Appendix H Requirements ☐

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

If yes, describe why the change was made:

BMP:Fall Annual Messaging

Message Description and Distribution Method:

Messaging on town website for proper disposal of leaf litter - "Lawn Care (Leaf Litter and Grass Clippings" brochure.

Targeted Audience: Residents

Responsible Department/Parties: Engineering

Measurable Goal(s):

Deliver annual messaging on applicable items in permit Appendix H and F.

Message Date(s): Ongoing

Message Completed for: Appendix F Requirements ☒ Appendix H Requirements ☒

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

If yes, describe why the change was made:

BMP:Stormwater Outreach on Town Website

Message Description and Distribution Method:

Public outreach material on the following subjects continually available at concordma.gov/2476/Public-Outreach-Information:

- Lawn Care (Leaf, Litter, and Grass Clippings)
- Pet Waste
- Septic Tanks
- Signs You Should Clean Your Septic Tank
- Pet Waste - Civic Duty
- Creating a Healthy Yard

- Soak Up the Rain Presentation

Stormwater information for local businesses:

- Stormwater Tips for Business Community
- What is Stormwater and Why Does it Matter

Targeted Audience: Residents, Business

Responsible Department/Parties: CPW

Measurable Goal(s):

Town stormwater web site is operational and continually updated based on questions and comments that arise, with sections directed towards target audience.

Message Date(s): Ongoing

Message Completed for: Appendix F Requirements ☒ Appendix H Requirements ☒

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

If yes, describe why the change was made:

BMP: Stormwater Information for Industrial Facilities

Message Description and Distribution Method:

"Put Hazardous Materials in Their Place" brochure posted to the Town website.

Targeted Audience: Industrial facilities

Responsible Department/Parties: CPW

Measurable Goal(s):

Deliver messaging in year 5 to target industrial sites.

Message Date(s): Ongoing

Message Completed for: Appendix F Requirements ☒ Appendix H Requirements ☒

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

If yes, describe why the change was made:

BMP: Stormwater Information for Industrial Facilities

Message Description and Distribution Method:

"Stormwater Pollution Prevention for Industrial Sites" brochure posted to the Town website.

Targeted Audience: Industrial facilities

Responsible Department/Parties: CPW

Measurable Goal(s):

Deliver messaging in year 5 to target industrial sites.

Message Date(s): Ongoing

Message Completed for: Appendix F Requirements ☒ Appendix H Requirements ☒

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

If yes, describe why the change was made:

BMP: Industrial Facilities**Message Description and Distribution Method:**

Facebook post aimed at educating industrial site managers on the importance of pollutants on their property.

Targeted Audience: Industrial facilities

Responsible Department/Parties: Engineering

Measurable Goal(s):

Deliver messaging in year 5 to target industrial sites.

Message Date(s): June 2023

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 Messaging**Message Description and Distribution Method:**

"What's the problem with fertilizers" brochure and comment posted to Facebook

Targeted Audience: Residents

Responsible Department/Parties: Engineering

Measurable Goal(s):

Deliver messaging on proper lawn care.

Message Date(s): June 2023

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 latest version of the SWMP is available online with a link to email comments or questions.

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 organized an educational event at the local elementary schools on January 17th, 24th, and 31st. The purpose was to enlighten school-aged children about the significance of preventing pollutants from entering our surface waters. The event featured a groundwater model demonstration to engage the children and illustrate how surface pollutants can infiltrate groundwater, ultimately affecting our rivers and ponds.

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: 1

Number of SSOs removed: 1

MS4 System Mapping

Optional: Provide additional status information regarding your map:

The Town updates its stormwater map periodically, as new information is collected. In particular, stormwater catchments were delineated in fiscal year 2022 based on available stormwater infrastructure information, elevation contours, and LIDAR digital elevation models available.

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: 0

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

Percent of outfalls screened: 100

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

The Town visited fourteen locations previously identified as interconnections. During the field observations, the Town determined that these locations are not interconnections and do not require sampling. As such, they will be removed from the outfall and interconnection priority ranking.

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:

57 catchments have been successfully investigated to-date of the 144 total. An additional 13 catchment inspections occurred where the outfall was identified as "not an outfall", which have been excluded from the totals reported. The Town has contracted with a consultant to conduct a catchment system vulnerability factors report. This report will inform wet weather sampling locations to begin in year-6 of the permit.

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:

See attached incident report from the Concord Fire Department.

Employee Training

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

The Town completed annual IDDE training for appropriate staff on June 23, 2022. This training included virtual classroom instruction hosted by UMASS-Amherst.

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: 12

Number of inspections completed: 8

Number of enforcement actions taken: 0

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): 6/30/2021

Website of ordinance or regulatory mechanism: <https://www.concordma.gov/DocumentCenter/View/96/Concord-Storm-Water-Regulations-PDF>

As-built Drawings

Below, report on the number of as-built drawings received during this reporting period.

Number of as-built drawings received: 1

Optional: Enter any additional information relevant to the submission of as-built drawings:

Street Design and Parking Lots Report

Below, describe any changes made or planned to be made to local regulations and guidelines based on the report completed in Year 4:

The evaluation has been finalized, and the Town is currently engaged in the process of formulating revisions to local regulations and guidelines as advised in the report.

Green Infrastructure Report

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

Concord regulations and guidelines do not explicitly ban green roofs or water harvesting devices, and infiltration practices are allowed and specified under Public Works' Design and Construction Standards.

Retrofit Properties Inventory

Below, list remaining permittee-owned properties that could be modified or retrofitted with BMPs to mitigate impervious areas (must maintain a minimum of 5 sites in inventory until less than 5 sites remain):

- 1) 37B Commonwealth Ave (Gerrow Recreation Area, SC-AR-96)
- 2) 29 Prairie St (Thoreau Elementary School, SC-AR-60)
- 3) 1276 Main St (Harvey Wheeler Community Center, SC-AR-66)
- 4) 41 Knox Tr (Concord Municipal Light Plant, SC-AR-67)
- 5) 8A Brown St (Cousins Park, SC-AR-89)

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. 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.

Baker Avenue Biofiltration
Nashoba and Wilson Rd Biofiltration
Finigan Way Basin #1
Finigan Way Basin #2
Finigan Way Basin #3

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: 572

Number of catch basins cleaned: 572

Total volume or mass of material removed from all catch basins: 404 cubic yards

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

Total number of catch basins: 3,785

If applicable:

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

A GIS tool has been created for the utilization of catch basin maintenance teams to record inspections and quantify debris removal. This tool is, in part, designed to pinpoint catch basins that exceed a 50% fill level. CPW will employ this data to enhance the cleaning of catch basins that do not meet the criteria specified in the MS4 permit.

Street Sweeping

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

☒ Number of miles cleaned: 360

☐ 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: 0

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

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

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. If any of the above year 5 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:

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

Yes, I agree ☒

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 6 below:

The Town of Concord has engaged the services of an engineering consultant to carry out an analysis and formulate a plan for the implementation of a Stormwater Utility program. Currently, the Town is in the process of drafting an Article for the April 2024 Town Meeting, with the aim of officially adopting this Stormwater Utility initiative. Once established, this utility will play a crucial role in providing funding to meet all obligations outlined in the MS4 permit.

Part V: Certification of Small MS4 Annual Report 2023

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:

Kerry A. Lafleur

Title:

Town Manager

Signature:



Date:

09/27/23

[Signatory may be a duly authorized representative]