

**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>

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

#### Annual Requirements

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

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

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

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

Hamilton does not own any stormwater treatment structures

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

### Part III: Receiving Waters/Impaired Waters/TMDL

Have you made any changes to your lists of receiving waters, outfalls, or impairments since the NOI was submitted?

- Yes  
 No

If yes, describe below, including any relevant impairments or TMDLs:

The Miles River (MA92-03) no longer requires a TMDL according to the Final Massachusetts Year 2018/2020 Integrated List of Waters. The Miles River (MA92-03) remains off of the Final Massachusetts Year 2022 Integrated List of Waters.

## Part IV: Minimum Control Measures

Please fill out all of the metrics below. If applicable, include in the description who completed the task if completed by a third party.

### MCM1: Public Education

Number of educational messages completed **during this reporting period:**

Below, report on the educational messages completed **during this reporting period**. For the measurable goal(s) please describe the method/measures used to assess the overall effectiveness of the educational program.

#### **BMP: Elementary School Program - Keeping Water Clean**

Message Description and Distribution Method:

Students in several activities designed to raise their stormwater and water conservation awareness. Students learn about watersheds, stormwater, ground water, wastewater, how we impact these systems, and how they should be protected/ma

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

3,001 Students  
334 Volunteers and Teachers  
46 Schools

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: Print Material/Magazine - Greenscapes Guide**

Message Description and Distribution Method:

The Greenscapes Guide is a 26 page magazine that covers sustainable landscaping tips, stormwater management tips for homeowners, and ways to conserve water use. These guides are distributed at every school program Greenscapes conducted this year. A digital version can be found on our website, under Resources: <https://greenscapes.org/greenscapes-guide/>

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

3,000 Greenscapes Guides distributed at school programs.

Message Date(s): Various dates between September 2023 - June 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: Regional Tabling Events**

Message Description and Distribution Method:

Events attended by Greenscapes personnel where printed materials were passed out: Boxford Apple Festival, Salem Living Green Expo, New England Biolabs Sustainability Fair.

Targeted Audience: Residents +

Responsible Department/Parties: Greenscapes Coalition

Measurable Goal(s):

Message Date(s): Various dates between September 2023 - June 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 - Scoop the Poop**

Message Description and Distribution Method:

Social media content informing residents the impact pet waste has on nearby watersheds.  
<https://greenscapes.org/resources-socialmedia/>

Targeted Audience: Residents +

Responsible Department/Parties: Greenscapes Coalition

Measurable Goal(s):

Facebook: 36 impressions  
Instagram: 99 impressions, 14 likes

Message Date(s): August 16th, 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: Social Media - Septic SMART**

Message Description and Distribution Method:

Social media content providing information on proper septic tank maintenance, reminding residents to routinely pump the tank.

<https://greenscapes.org/resources-socialmedia/>

Targeted Audience: Residents +

Responsible Department/Parties: Greenscapes Coalition

Measurable Goal(s):

Facebook: 136 impressions, 6 likes

Instagram: 41 impressions, 6 likes

Message Date(s): September 20th, 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: Social Media - Yard Waste Disposal**

Message Description and Distribution Method:

Social media content sharing how to properly dispose of yard waste and to never place waste in wetlands.

<https://greenscapes.org/resources-socialmedia/>

Targeted Audience: Residents +

Responsible Department/Parties: Greenscapes Coalition

Measurable Goal(s):

Facebook: 68 impressions, 1 share

Instagram: 50 impressions, 5 likes, 1 share.

Message Date(s): October 11th, 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: Social Media - What is a Storm Drain?**

Message Description and Distribution Method:

Social media content informing viewers the purpose storm drains serve and the importance of clearing them when they are clogged.

<https://greenscapes.org/resources-socialmedia/>

Targeted Audience: Residents +

Responsible Department/Parties: Greenscapes Coalition

Measurable Goal(s):

Facebook: 31 impressions

Instagram: 47 impressions, 10 likes, 1 share.

Message Date(s): October 12th, 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: Social Media - Swimming Pools & Water Quality**

Message Description and Distribution Method:

Social media flier to educate residents on proper pool drainage to reduce chlorinated water from entering our water ways.

<https://greenscapes.org/resources-socialmedia/>

Targeted Audience: Residents +

Responsible Department/Parties: Greenscapes Coalition

Measurable Goal(s):

Facebook: 37 impressions

Instagram: 37 impressions, 3 likes

Message Date(s): October 18th, 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: Social Media - Save your Drain**

Message Description and Distribution Method:

Social media content reminding residents to never put oils, fats, or grease down their drains.  
<https://greenscapes.org/resources-socialmedia/>

Targeted Audience: Residents +

Responsible Department/Parties: Greenscapes Coalition

Measurable Goal(s):

Facebook: 33 impressions  
Instagram: 38 impressions, 3 likes

Message Date(s): November 22nd, 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: Social Media - Salt Goes Where Water Flows**

Message Description and Distribution Method:

Social media content that provided the dangers of road salt. Post included environmental friendly options to reduce salt in local bodies of water.  
<https://greenscapes.org/resources-socialmedia/>

Targeted Audience: Residents +

Responsible Department/Parties: Greenscapes Coalition

Measurable Goal(s):

Facebook: 45 impressions, 4 likes  
Instagram: 46 impressions, 7 likes

Message Date(s): December 14th, 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: Media - Salt Goes Where Water Flows Flyer**

Message Description and Distribution Method:

Flyer that provides the dangers of road salt and environmentally friendly alternatives.  
<https://greenscapes.org/resources-socialmedia/>

Targeted Audience: Residents +

Responsible Department/Parties: Greenscapes Coalition

Measurable Goal(s):

Distributed to 90 Greenscapes Municipal members.

Message Date(s): December 14th, 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: Social Media - Consider Native Plants**

Message Description and Distribution Method:

Social media content sharing the benefits native species provide, requiring no fertilizer and less water.  
<https://greenscapes.org/resources-socialmedia/>

Targeted Audience: Residents +

Responsible Department/Parties: Greenscapes Coalition

Measurable Goal(s):

Facebook: 49 impressions, 3 likes, 1 share  
Instagram: 41 impressions, 11 likes, 1 share

Message Date(s): May 24th, 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: Public Lecture - Hamilton Wenham League of Women Voters**

Message Description and Distribution Method:

Greenscapes personnel attended a panel discussion with Senator Tarr and Rep. Kassner about the regional work we do to improve water resource management and water conservation.

Targeted Audience: Residents +

Responsible Department/Parties: Greenscapes Coalition

Measurable Goal(s):

35 residents

Message Date(s): March 28th 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: Public Lecture - Greenscapes 101**

Message Description and Distribution Method:

Presented to Hamilton/Wenham's Garden club the importance of native species, water conservation, and fertilizer use.

Targeted Audience: Residents +

Responsible Department/Parties: Greenscapes Coalition

Measurable Goal(s):

30 residents

Message Date(s): February 14th 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 Department of Public Works (DPW) made the Stormwater Management Plan (SWMP) available to the public on their website and upon request.

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:**

Hamilton DPW maintains their stormwater hotline (DPW main number) and continues to inform residents of the proper town offices to contact if they need information or to report problems dealing with stormwater issues.

Hamilton participated in a Hazardous Waste Dropoff Day with the Town of Wenham, where residents of the towns can drop off waste. This year's event took place on November 11, 2023, and a total of 5,900 pounds of materials were collected, with 2,950 pounds collected from Hamilton residents. Some of the items collected included motor oil, liquid pesticide, bleach, flammable liquids, and flammable aerosols.

## 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:

Phase I mapping requirements have been fulfilled. Pipes, manholes, catch basins and refined catchment delineations continue to be updated/incorporated into the system map as catchment investigations are conducted. The required applicable information for all outfalls will be included within ten (10) years of the permit effective date.

**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:

All outfalls were monitored during dry weather and the results were reported in the Year 2 (2020) annual report.

**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 performed the remaining 5 catchment investigations during Permit Year 6, which included sandbagging, as needed, to isolate flow. Any flowing outfalls were traced upstream to track and identify the source of the flow. All town-owned structures, where flowing, were screened for the sampling parameters required by the MS4 Permit. Catchment Investigation data is attached to this email submission.

Per the permit, the Town is only reporting catchment investigations as complete when outfalls/interconnections have been screened during dry weather, when key junction manholes in these catchments have been screened, when wet weather sampling has been completed, and when all results indicate no evidence of likely sewer input based on field observations and sampling. Most outfalls in Hamilton have at least one System Vulnerability Factor, therefore wet weather outfall/interconnection sampling must be conducted for catchment investigation to be considered complete. Wet weather outfall/interconnection sampling is scheduled to begin in Permit Year 7 and will be completed by Permit Year 10.

**IDDE Progress**

*If illicit discharges were found, please submit a document describing work conducted over this reporting period, and cumulative to date, including location source; description of the discharge; method of discovery; date of discovery; and date of elimination, mitigation, or enforcement OR planned corrective measures and schedule of removal.*

- No illicit discharges were found
- The illicit discharge removal report is attached to the email submission
- The illicit discharge removal report can be found at the following publicly available website:

*Below, report on the number of illicit discharges identified and removed, along with the volume of sewage removed **during this reporting period.***

Number of illicit discharges identified:

Number of illicit discharges removed:

Estimated volume of sewage removed:  gallons/day

*Below, report on the total number of illicit discharges identified and removed to date. At a minimum, report on the number of illicit discharges identified and removed **since the effective date of the permit (July 1, 2018).***

Total number of illicit discharges identified:

Total number of illicit discharges removed:

*Optional:* Provide any additional information for clarity regarding illicit discharges identified, removed, or planned to be removed below:

**Employee Training**

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

IDDE and Good Housekeeping Practices training was completed jointly with the Town of Wenham on March 14, 2024. A total of 8 municipal personnel were in attendance. Specific topics covered included how to correctly identify and illicit discharge, how to report and illicit discharge, and tips for best housekeeping practices at municipal facilities, and in particular, those facilities with a SWPPP.

**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:

**As-built Drawings**

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

Number of as-built drawings received:

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

### **Street Design and Parking Lots Report**

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

No changes were made during this reporting period. The Town is planning on implementing changes based on the report throughout future permit years.

### **Green Infrastructure Report**

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

No changes were made during this reporting period. The Town is planning on implementing changes based on the report throughout future permit years.

### **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) Hamilton Town Hall
- 2) Hamilton Wenham Public Library
- 3) Winthrop Elementary School
- 4) Council of Aging - Senior Center
- 5) Patton Park

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.

No properties were modified or retrofitted with BMPS during Permit Year 6.

### 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:

If catch basin sumps are more than 50 percent full during two consecutive routine inspections/cleaning events, the Town documents the finding and investigates the contributing drainage area for sources of excessive sediment loading. This process is in addition to cleaning the sediment from the catch basin.

#### **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:

No corrective actions were taken during Permit Year 6.

Quarterly inspections occurred at the DPW Facility on:  
 08/14/2023  
 11/13/2023

02/12/2024 05/13/2024
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### 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):

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If such monitoring or studies were conducted on your behalf or if monitoring or studies conducted by other entities were reported to you, a brief description of the type of information gathered or received shall be described below:

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#### **Additional Information**

*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.

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**Year 7**

#### **Activities Planned for Next Reporting Period**

Please confirm that your SWMP has been, or will be, updated to comply with all applicable permit requirements including but not limited to the year 7 requirements summarized below. (Note: impaired waters and TMDL requirements are not listed below)

Yes, I agree

- Complete investigations of catchments associated with Problem Outfalls
- Complete investigations of catchments where any information gathered on the outfall/interconnection identifies sewer input

#### Annual Requirements

- Annual report submitted and available to the public
- Annual opportunity for public participation in review and implementation of SWMP
- Keep records relating to the permit available for 5 years and make available to the public
- Properly store and dispose of catch basin cleanings and street sweepings so they do not discharge to receiving waters
- Annual training to employees involved in IDDE program
- Update inventory of all known locations where SSOs have discharged to the MS4
- Continue public education and outreach program
- Update outfall and interconnection inventory and priority ranking and include data collected in connection with the dry weather screening and other relevant inspections conducted
- Implement IDDE program
- Review site plans of construction sites as part of the construction stormwater runoff control program
- Conduct site inspection of construction sites as necessary
- Inspect and maintain stormwater treatment structures
- Log catch basins cleaned or inspected
- Sweep all curbed streets at least annually
- Continue investigations of catchments associated with Problem Outfalls
- Implemented SWPPPs for all permittee owned or operated maintenance garages, public works yards, transfer stations, and other waste handling facilities
- Review inventory of all permittee owned facilities in the categories of parks and open space, buildings and facilities, and vehicles and equipment; update if necessary
- Review O&M programs for all permittee owned facilities; update if necessary
- Implement all maintenance procedures for permittee owned facilities in accordance with O&M programs
- Implement program for MS4 infrastructure maintenance to reduce the discharge of pollutants
- Enclose all road salt storage piles or facilities and implemented winter road maintenance procedures to minimize the use of road salt
- Review as-built drawings for new and redevelopment to ensure compliance with post construction bylaws, regulations, or regulatory mechanism consistent with permit requirements
- Inspect all permittee owned treatment structures (excluding catch basins)
- Identify additional permittee-owned properties that could potentially be modified or retrofitted with BMPs to reduce impervious areas so that the permittee maintains a minimum of 5 sites in their inventory, until such a time when the permittee has less than 5 sites remaining

Provide any additional details on activities planned for permit year 7 below:



## Part V: Certification of Small MS4 Annual Report 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:  Title:

Signature:  Date:

*[Signatory may be a duly authorized representative]*