

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 Paxton

EPA NPDES Permit Number: MAR041148

Primary MS4 Program Manager Contact Information

Name: Travis Thibault

Title: Director of Public Works

Street Address Line 1: 107 Holden Road

Street Address Line 2: NA

City: Paxton

State: MA

Zip Code: 01612

Email: tthibault@townofpaxton.net

Phone Number: (508) 753-9077

Stormwater Management Program (SWMP) Information

SWMP Location (publicly available web address): <https://www.townofpaxton.net/stormwater-awareness>

Date SWMP was Last Updated: Sep 23, 2022

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:

- ☒ 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:

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)

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 Nitrogen 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:

Any structural BMPs listed in Attachment 3 to Appendix F already existing or installed in the regulated area by the permittee or its agents was tracked and the nitrogen 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 nitrogen 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 nitrogen removed in lbs/year from the installed BMPs: 0

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 permit does not require tracking of existing BMP's for municipalities subject to Nitrogen TMDL requirements (Appendix F, part B.I.1.c.iii). No new BMP's have been installed to date, but any such changes will be tracked as they are installed. The Nitrogen source Identification report is in progress, including an assessment of stormwater retrofit opportunities.

Lake and Pond Phosphorus TMDL

- ☐ Completed the written Lake Phosphorus Control Plan (LPCP), including: *(select the items in the LPCP that have been completed)*
- ☐ Planned nonstructural controls
 - ☐ Planned structural controls
 - ☐ O&M program for structural controls
 - ☐ Implementation schedule
 - ☐ Cost of implementation

The LPCP: *(select one of the following options)*

- ☐ is attached to the email submission
- ☐ can be found at the following publicly available website:

Below, calculate your current phosphorus export rate by first filling out the individual phosphorus loading components (labeled [A], [B], [C], and [D]) and then computing your current phosphorus export rate using the equation provided.

Baseline phosphorus export reduction required from LPCP Area (lbs/ year) [A]: 0

- ☐ Documented the nonstructural control measures implemented during **this reporting period** and their phosphorus reduction

total phosphorus reduction from all nonstructural controls this reporting period (**lbs/year**) [B]:

0

- ☐ No nonstructural control measures were implemented
- ☐ The nonstructural control measures information is attached to the email submission
- ☐ The nonstructural control measures information can be found at the following publicly available website:

- ☐ Documented the structural control measures implemented during **this reporting period and all previous years**, including location, phosphorus reduction in weight/year, and date of last completed maintenance and inspection for each control

total phosphorus reduction from all structural controls installed this reporting period and all previous years (**lbs/year**) [C]:

0

- ☐ No structural control measures were implemented
- ☐ The structural control measures information is attached to the email submission
- ☐ The structural control measures information can be found at the following publicly available website:

Phosphorus load increase due to development incurred since baseline loading was calculated in **lbs/year** [D]:

0

Current phosphorus export rate from the LPCP Area in **lbs/year** [=A-(B+C)+D from above]:

0

- ☐ I certify under penalty of law that all source control and treatment Best Management Practices being claimed for phosphorus reduction credit have been inspected, maintained and repaired in accordance with manufacturer or design specification. I certify that, to the best of my knowledge, all Best Management Practices being claimed for a phosphorus reduction credit are performing as originally designed.
- ☐ All municipally owned and maintained turf grass areas are being managed in accordance with Massachusetts Regulation 331 CMR 31.00 pertaining to proper use of fertilizers on turf grasses

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:

We're currently working with Fuss and O'Neil, and the Lake and Phosphorus Control Plan is 90% completed.

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

The Town of Paxton has subcontracted Fuss and O'Neil to assist with bringing the Town into compliance with all items related to the MS4 Permit. To date the Street Design and Parking lot Guidelines are 100% completed, and we are in the process of working with the Towns Planning board to make alterations to the Towns current Subdivision Bylaws, the Outfall screenings are 98% complete, the Nitrogen Source Identification Report is

95% complete, the Lake Phosphorus Control Plan is 90% complete, and the Stormwater Retrofit Plan: Phase 2 is 10% complete.

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:

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:Clean Water Begins with you Let's Think Blue

Message Description and Distribution Method:

Annual Census: Pollution threats due to dog waste, close trash barrels, construction prevent dirt runoff, businesses can stop oil, gas & grease runoff by using drip pan, etc.

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

2,000 flyers were mailed

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:

The Town felt it was a good way to distribute the message to the public.

BMP:Be a leaf hero

Message Description and Distribution Method:

Annual Census: Don't sweep into the streets, runoff causes pollution

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

2,000 Flyers were mailed

Message Date(s): January 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:

The town felt this was a good way to distribute the message

BMP:Think Blue Developers Sediment Control Press Release

Message Description and Distribution Method:

Flyer is present on the town's website providing information on the importance of erosion control for construction sites.

Targeted Audience: Developers (construction)

Responsible Department/Parties: Conservation Committee

Measurable Goal(s):

Visitors to the website

Message Date(s): Rolling

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:

Town felt it was a good way to introduce developers to stormwater

BMP:Gas, Oil, Grease...Oh My!

Message Description and Distribution Method:

Town of Paxton web post outlining the correct handling of gas, oil, and grease for spill prevention

Targeted Audience: Residents/Businesses

Responsible Department/Parties: DPW Operations/Board of Health

Measurable Goal(s):

Visitors to the website

Message Date(s): Rolling

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:Think Blue Stop Erosion in its Tracks to Keep Our Water Clean

Message Description and Distribution Method:

Providing information in regards to construction site runoff

Targeted Audience: Developers (construction)

Responsible Department/Parties: DPW Operations/Building Inspector

Measurable Goal(s):

Reduction in issues on construction sites.

Message Date(s): Rolling

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:Think Blue Put Waste in its Place for Clean Water

Message Description and Distribution Method:

Put waste in its place

Targeted Audience: Businesses

Responsible Department/Parties: BOH

Measurable Goal(s):

clean businesses

Message Date(s): rolling

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:

message to reach businesses

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 SWMP was posted on the Town's website for public comment during this reporting period.

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 is a member of Wachusett Earthday, Inc., where hazardous collections were held this year.

The Town's residents coordinated an Earth Day event where residents collected trash and debris along roadways, parks, and trails.

MCM3: Illicit Discharge Detection and Elimination (IDDE)

Sanitary Sewer Overflows (SSOs)

Check off the box below if the statement is true.

☒ This SSO section is NOT applicable because we DO NOT have sanitary sewer

*Below, report on the number of SSOs identified in the MS4 system and removed **during this reporting period.***

Number of SSOs identified:

Number of SSOs removed:

MS4 System Mapping

Optional: Provide additional status information regarding your map:

The storm system mapping of structures (outfalls, catch basins, manholes) is substantially complete. Fuss and O'Neil updated/fixed some of the mapping issues we had for structures as they did catchment investigations for the Town. The Town will continue working on further developing the mapping for the storm system as necessary.

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 outfall screenings have been completed to date. Attached you should find a table with the results of dry weather outfall sampling that Fuss & O'Neil completed for the Town this year.

Town of Paxton staff had previously screened the Town's 105 outfalls during dry weather conditions. Of the 105 outfalls screened there 40 outfalls observed to have flow. Fuss and O'Neil's field staff visited each of these 40 outfalls to conduct follow-up sampling between November 2022 and December of 2022. However, when revisited, 24 of the 40 outfalls were flowing and therefore sampled. The Town is working with Fuss and O'Neil to finalize a memo summarizing the dry weather outfall screening and sampling results.

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:

Catchment investigations are 98% completed. There are a couple structures that may need follow-up to see if there is active flow. Attached you should find a table with the catchment investigations to date. The Town is working with Fuss and O'Neil to complete catchment investigations and finalize a memo summarizing the catchment investigation results.

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:

Fuss and O'Neil is currently working on finalizing a memo to describe the findings of their sampling and provide their recommendations.

Employee Training

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

All staff Participated in an in house IDDE training by watching the training video on CMRSWC's website at the below link:

<https://www.centralmastormwater.org/toolbox/pages/2020-idde-workshop-ms4-assistance-grant>

We also had several toolbox talks pertaining to storm water where we discussed the importance of Catch basin cleanings and inspections, outfall inspections, and manhole inspections.

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: 0

Number of inspections completed: 0

Number of enforcement actions taken: 0

Optional: Enter any additional information relevant to construction site plan reviews, inspections, and enforcement actions:

No Construction Site storm systems necessary in this reporting period.

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: 0

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:

Fuss and O'Neil prepared the Street design and Parking lot Guidelines for the Town of Paxton. Earlier this year we met with Fuss and O'Neil, the Town Administrator, and members of the Planning Board to discuss implementing changes into the Town's zoning bylaws and Subdivision Rules and Regulations as per the recommendations of the report. The Planning Board is in the process over reviewing all data, and making changes to do so. The projected time line is as follows:

Summer/Fall 2023 Develop draft of amended language of Zoning Bylaws and Subdivision Rules and Regulations

Winter/Spring 2024 Hold public hearings and make amendments

Spring /Summer 2024 Present final draft to boards and Town Meeting

Green Infrastructure Report

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

As part of the review and updating process for the Zoning Bylaws, and Subdivision Rules The Planning Board will also be looking at the best way to implement the recommendations made to allow for Green Infrastructure throughout town.

The Time line for this process is as follows:

Summer/Fall 2023 Develop draft of amended language of Zoning Bylaws and Subdivision Rules and Regulations

Winter/Spring 2024 Hold public hearings and make amendments

Spring /Summer 2024 Present final draft to boards and Town Meeting

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. Paxton Center School
2. Paxton Senior Center
3. Paxton Town Hall
4. ROW along Richards ave./MA-56
5. Klingele Fields

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.

To date we are still in the process of working with Fuss and O'Neil on the Retrofit Concepts task. We are currently 10% complete with Phase 2 of the Stormwater Retrofit Plan.

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: [Select Units]

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

Total number of catch basins:

If applicable:

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

Street Sweeping

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

☐ Number of miles cleaned:

☐ Volume of material removed: [Select Units]

☒ Weight of material removed: tons

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:

We are still currently working to finalize all SWPPP's sites, so to date no inspections have been completed.

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:

During the reporting year we had some significant mechanical issues with our catch basin truck in the Fall of 2022, and this took several months for the Town to get all repairs corrected. The Town's plan was to clean all basins throughout the Town in the Spring of 2023 since we were unable to do any cleanings in the Fall of 2022.

In the later part of winter/early spring of 2023 when we were getting ready to start system wide catch basin cleanings the one operator that we had to run the equipment at the time was injured, and the Town was unable to complete any basin cleanings throughout the reporting period.

Since the start of this Fiscal Year we have been out cleaning basins when time allows, and we have almost completed a system wide cleaning of every catch basin thus far this year. We anticipate to have all cleanings completed for this year by the end of October, and a second round of cleanings to start in May of 2024.

The Town has all necessary information gathered together for the Stormwater Pollution Prevention Plans (SWPPP's), and anticipates by the end of the calendar year to have all SWPPP's completed, and to start implementing all necessary inspection at that time.

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:

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:

Travis Thibault

Title:

Director of Public Works

Signature:

Date:

*[Signatory may be a duly authorized
representative]*

Note: When prompted during signing, save the document under a new file name.

Annual Report Submission

Please submit the form electronically via email to both EPA and MassDEP by clicking on one of the links below or using the email addresses listed below. Please ensure that all required attachments are included in the email and not attached to this PDF.

EPA: stormwater.reports@epa.govMassDEP: Stormwater.DEP@mass.gov

Paper Signature:

If you did not sign electronically above, you can print the signature page by clicking the button below.

[Print Signature Page](#)

Optional: If you did not sign electronically above, you may lock the form by clicking the "Lock Form" button below which will prompt you to save the locked version of the form. Save this locked version under a new file name.

[Lock Form](#)