

**Year 3 Annual Report**  
**Massachusetts Small MS4 General Permit**  
**Reporting Period: July 1, 2020-June 30, 2021**

*\*\*Please DO NOT attach any documents to this form. Instead, attach all requested documents to an email when submitting the form\*\**

*Unless otherwise noted, all fields are required to be filled out. If a field is left blank, it will be assumed the requirement or task has not been completed. Please ONLY report on activities between July 1, 2020 and June 30, 2021 unless otherwise requested.*

**Part I: Contact Information**

Name of Municipality or Organization: City of Somerville

EPA NPDES Permit Number: MAR041082

**Primary MS4 Program Manager Contact Information**

Name: Lucica S. Hiller

Title: Stormwater Program Manager

Street Address Line 1: 1 Franey Road

Street Address Line 2:

City: Somerville

State: MA

Zip Code: 02145

Email: lhiller@somervillema.gov

Phone Number: (617) 448-3716

**Stormwater Management Program (SWMP) Information**

SWMP Location (web address): <https://www.somervillema.gov/capital-projects-and-planning/engineering/stormwater-management-program>

Date SWMP was Last Updated: Jun 30, 2020

If the SWMP is not available on the web please provide the physical address:

## Part II: Self-Assessment

First, in the box below, select the impairment(s) and/or TMDL(s) that are applicable to your MS4. Make sure you are referring to the most recent EPA approved Section 303(d) Impaired Waters List which can be found here: <https://www.epa.gov/tmdl/region-1-impaired-waters-and-303d-lists-state>

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

Next, check off all requirements below that have been completed. **By checking each box you are certifying that you have completed that permit requirement fully.** If you have not completed a requirement leave the box unchecked. Additional information will be requested in later sections.

### Year 3 Requirements

- Inspected and screened all outfalls/interconnections (excluding Problem and Excluded outfalls)
- Updated outfall/interconnection priority ranking based on the information collected during the dry weather inspections as necessary
- Post-construction bylaw, ordinance, or other regulatory mechanism was updated and adopted consistent with permit requirements

*Optional:* If you would like to describe progress made on any incomplete requirements listed above, provide any additional information, and/or if any of the above year 3 requirements could not be completed due to the impacts of COVID-19, please identify the requirement that could not be completed, any actions taken to attempt to complete the requirement, and reason the requirement could not be completed below:

With the completion and submission of the Preliminary IDDE Plan in June 2020, the City started implementing the plan by conducting IDDE field investigations to fulfill the requirements of the Administrative Order CWA-AO-R01-FY19-27 (AO).

The City started the dry weather outfall screening and sampling for its sixteen (16) MS4 outfalls in October 2020. The results of the screening and sampling show that:

- At four (4) outfalls, the samples showed exceeding levels of ammonia ( $\geq 0.5$  mg/L)
- At six (6) outfalls, the water samples exceeded the water quality standard for E. coli ( $\geq 235$  CFU/100 mL)
- At eight (8) outfalls, the samples showed exceeding levels of surfactants ( $\geq 0.25$  mg/L)
- At eight (8) outfalls, the samples showed detectable levels of chlorine.
- Taken together, these results show that there is likely sewer input into Outfalls 7, 25, 28, 31, and 32.

These results have informed the prioritization of the dry weather catchment investigations, which the City

started in Year 3 and made significant progress on. The City decided to complete the catchment investigations for all our 16 MS4 outfall/interconnections during calendar year 2021 and we finalized more than 95% of the key junction manhole inspections during Permit Year 3.

The City's Stormwater Ordinance was adopted in May 2020 and the new Engineering Site Permit Rules and Regulations have been updated in August 2020.

### Annual Requirements

- Provided an opportunity for public participation in review and implementation of SWMP and complied with State Public Notice requirements
- Kept records relating to the permit available for 5 years and made available to the public
- The SSO inventory has been updated, including the status of mitigation and corrective measures implemented
  - This is not applicable because we do not have sanitary sewer
  - This is not applicable because we did not find any new SSOs
  - The updated SSO inventory is attached to the email submission
  - The updated SSO inventory can be found at the following website:
- Properly stored and disposed of catch basin cleanings and street sweepings so they did not discharge to receiving waters
- Provided training to employees involved in IDDE program within the reporting period
- All curbed roadways were swept at least once within the reporting period
- Updated system map due in year 2 as necessary
- Enclosed all road salt storage piles or facilities and implemented winter road maintenance procedures to minimize the use of road salt
- Implemented SWPPPs for all permittee owned or operated maintenance garages, public works yards, transfer stations, and other waste handling facilities
- Updated inventory of all permittee owned facilities as necessary
- O&M programs for all permittee owned facilities have been completed and updated as necessary
- Implemented all maintenance procedures for permittee owned facilities in accordance with O&M programs
- Implemented program for MS4 infrastructure maintenance to reduce the discharge of pollutants
- Inspected all permittee owned treatment structures (excluding catch basins)

*Optional:* If you would like to describe progress made on any incomplete requirements listed above, provide any additional information, and/or if any of the above annual requirements could not be completed due to the impacts of COVID-19, please identify the requirement that could not be completed, any actions taken to attempt to complete the requirement, and reason the requirement could not be completed below:

With the ongoing COVID 19 pandemic and the staffing transitions within the Engineering Division and the Water & Sewer Department, the SWMP has not been updated this permit year and no specific events for public participation and review of the existing document have been organized. The SWMP is available on-line

for residents to read and ask questions. The City hired a Stormwater Program Manager in November 2020, who has reviewed the existing program and planning documentation, including the SWMP. The SWMP is being updated with the help of a consultant to include the all the IDDE work completed in permit Year 3 and ongoing tin Year 4. The aim up this update is to align the schedule with the Final IDDE Plan due December 31, 2021. A draft SWMP will be available in the Spring of 2022 for public review and comments.

The Phase I system map has been updated since it was first created as the City has been refining the system and connectivities through the extensive IDDE program this reporting year, but the updated version has not been published yet. The City is working closely with DCR on identifying and confirming additional interconnections along the Alewife Brook Parkway and we are still identifying City owned treatment structures. The IDDE investigations has helped us make significant progress towards the Phase II system map. The City will publish an updated Phase I system map along with the Final IDDE Plan due December 31, 2021.

The City does not have any facilities in the MS4 area that require a SWPPP.

The City has completed draft O&M programs and procedures that are currently under review. We expect to finalize these during permit Year 4. Although these programs and procedures are in draft form, they are already being implemented by City staff.

The City is still working on an inventory of City owned treatment structures and is committed to complete it and start the inspection program during permit Year 4.

## **Bacteria/ Pathogens** (Combination of Impaired Waters Requirements and TMDL Requirements as Applicable)

### Annual Requirements

#### *Public Education and Outreach\**

- Annual message was distributed encouraging the proper management of pet waste, including noting any existing ordinances where appropriate
- Permittee or its agents disseminated educational material to dog owners at the time of issuance or renewal of dog license, or other appropriate time
- Provided information to owners of septic systems about proper maintenance in any catchment that discharges to a water body impaired for bacteria

*\* Public education messages can be combined with other public education requirements as applicable (see Appendix H and F for more information)*

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

The City does not have any residences with septic systems so will not be distributing information regarding maintenance of septic systems.

The City is still working to distribute information at the time of pet licensing to supply dog owners with educational materials regarding the proper disposal of pet waste.

## **Phosphorus** (Combination of Impaired Waters Requirements and TMDL Requirements as Applicable)

### Annual Requirements

#### *Public Education and Outreach\**

- Distributed an annual message in the spring (April/May) encouraging the proper use and disposal of grass clippings and encouraging the proper use of slow-release and phosphorus-free fertilizers
- Distributed an annual message in the summer (June/July) encouraging the proper management of pet waste, including noting any existing ordinances where appropriate
- Distributed an annual message in the fall (August/September/October) encouraging the proper disposal of leaf litter

*\* Public education messages can be combined with other public education requirements as applicable (see Appendix H and F for more information)*

*Good Housekeeping and Pollution Prevention for Permittee Owned Operations*

- Increased street sweeping frequency of all municipal owned streets and parking lots subject to Permit part 2.3.7.a.iii.(c) to a minimum of two times per year (spring and fall)

*Potential structural BMPs*

- Any structural BMPs already existing or installed in the regulated area by the permittee or its agents was tracked and the phosphorus removal by the BMP was estimated consistent with Attachment 3 to Appendix F. The BMP type, total area treated by the BMP, the design storage volume of the BMP and the estimated phosphorus removed in mass per year by the BMP were documented.
  - The BMP information is attached to the email submission
  - The BMP information can be found at the following website:

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

The City is currently evaluating the appropriateness of the existing public education program and the distribution methods we use for the educational materials that MyRWA is supplying us with. We are working on updating our Stormwater Management website to include more educational materials and general information.

The City is also working on developing an inventory of structural BMPs already installed in the MS4 area and collecting the relevant information needed to calculate phosphorus removal. We expect to have the inventory completed by the end of permit Year 4.

**Solids, Oil and Grease (Hydrocarbons), or Metals**

**Annual Requirements**

*Good Housekeeping and Pollution Prevention for Permittee Owned Operations*

- Increased street sweeping frequency of all municipal owned streets and parking lots to a schedule that targets areas with potential for high pollutant loads
  - Prioritized inspection and maintenance for catch basins to ensure that no sump shall be more than 50 percent full; Cleaned catch basins more frequently if inspection and maintenance activities indicated excessive sediment or debris loadings

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

The City has an extensive street sweeping program and the existing street sweeping contract with a third party

vendor is set for sweeping every street every other week. The City is not currently considering further increasing the sweeping frequency in our MS4 area.

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

A robust catch basin cleaning program has started during permit Year 3. This program relies on both City staff and a third party contractor to inspect and clean all the MS4 catch basins. The cleaning program started in the Assembly Square area, as construction is ongoing, and asset and debris measurements are collected using field tablets and Survey123. Catch basins with significant debris are being re-inspected after 6 months and cleaned, if needed. We anticipate that after 2 years of this catch basin cleaning program, we will have the necessary data to understand the areas and streets with excessive sediment and debris loads, and to update our catch basin cleaning program with a cleaning frequency targeted at problem areas.

### **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 City has updated our documentation and sampling requirements based on the new Final 2016 303(d) List.

## 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:Soil erosion and sediment controls at construction sites**

Message Description and Distribution Method:

Twitter message with image that shows implementation of soil erosion and sediment controls at construction sites. Message was developed by MyRWA.

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

4 likes

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:Shovel More, Salt Less!**

Message Description and Distribution Method:

Twitter message developed by MyRWA to educate the public in using de-icer instead of salt when it snows.

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

4 retweets, 11 likes, 2 comments

Message Date(s): February 224, 021

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:Pet Waste**

Message Description and Distribution Method:

Twitter message developed by MyRWA to remind people to clean up after their dogs.

Targeted Audience: Residents

Responsible Department/Parties: Engineering

Measurable Goal(s):

1 Retweet, 10 Likes

Message Date(s): June 12, 2020

Message Completed for: Appendix F Requirements  Appendix H Requirements

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

If yes, describe why the change was made:

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:**

With the ongoing COVID 19 pandemic and the staffing transitions within the Engineering Division and the Water & Sewer Department, the SWMP has not been updated this permit year and no specific events for public participation and review of the existing document have been organized. The SWMP is available on-line for residents to read and ask questions. The City hired a Stormwater Program Manager in November 2020, who has reviewed the existing program and planning documentation, including the SWMP. The SWMP is

being updated with the help of a consultant to include the all the IDDE work completed in permit Year 3 and ongoing to align with the Final IDDE Plan due December 31, 2021. A draft SWMP will be available in the Spring of 2022 for public review and comments.

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**:

### **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 Phase I system map has been updated since it was first created as the City has been refining the GIS system and connectivities through the extensive IDDE program this reporting year, but the updated version has not been published yet. The City is working closely with DCR on identifying and confirming additional interconnections along the Alewife Brook Parkway and we are still identifying City owned treatment structures. The IDDE investigations has helped us make significant progress towards the Phase II system map to include outfalls partial location, pipes, manholes catch basins, refined catchment delineation, and collected asset data such as size, material, and elevations.

#### **Screening of Outfalls/Interconnections**

*If conducted, please submit any outfall monitoring results from this reporting period. Outfall monitoring results should include the date, outfall/interconnection identifier, location, weather conditions at time of sampling, precipitation in previous 48 hours, field screening parameter results, and results from all analyses. Please also include the updated inventory and ranking of outfalls/interconnections based on monitoring results.*

- No outfalls were inspected
- The outfall screening data is attached to the email submission
- The outfall screening data can be found at the following website:

<https://www.somervillema.gov/capital-projects-and-planning/engineering/stormwater-management-program>

*Below, report on the number of outfalls/interconnections screened **during this reporting period.***

Number of outfalls screened:

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

Percent of outfalls screened:

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

The City started the dry weather outfall screening and sampling for its sixteen (16) MS4 outfalls in October 2020. The results of the screening and sampling show that:

- At four (4) outfalls, the samples showed exceeding levels of ammonia ( $\geq 0.5$  mg/L)
- At six (6) outfalls, the water samples exceeded the water quality standard for E. coli ( $\geq 235$  CFU/100 mL)
- At eight (8) outfalls, the samples showed exceeding levels of surfactants ( $\geq 0.25$  mg/L)
- At eight (8) outfalls, the samples showed detectable levels of chlorine.
- Taken together, these results show that there is likely sewer input into Outfalls 7, 25, 28, 31, and 32.

### **Catchment Investigations**

*If conducted, please submit all data collected during this reporting period as part of the dry and wet weather investigations. Also include the presence or absence of System Vulnerability Factors for each catchment.*

- No catchment investigations were conducted
- The catchment investigation data is attached to the email submission
- The catchment investigation data can be found at the following website:

<https://www.somervillema.gov/capital-projects-and-planning/engineering/stormwater-management-program>

*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:*

During this reporting period, the City was committed to the implementation of our IDDE program and the completion of the dry weather catchment investigations for all our catchments. We were successful in completing the investigations for all our catchment areas previously identified, but the field investigations showed that the catchment area for Outfall 32 is larger. The catchment investigation for Outfall 32 will be completed in the Fall of 2021 and the findings will be incorporated into the Final IDDE Plan due December 31, 2021.

### **IDDE Progress**

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

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

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

Number of illicit discharges identified:

Number of illicit discharges removed:

Estimated volume of sewage removed:  gallons/day

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

Total number of illicit discharges identified:

Total number of illicit discharges removed:

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

The catchment investigations for this permit Year 3 focused on both dry and wet weather sampling and investigations for all MS4 catchments to identify the pipe segments where potential illicit connections might exist. The continuing COVID 19 pandemic has prevented us from further investigating private residences to confirm illicit connections, but allowed us to complete the catchment investigations for all our MS4 system at the time of writing this report.

The focus for Year 4 will transition to dye testing private residences to confirm and remove illicit connections.

**Employee Training**

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

A general annual IDDE training was completed in July 2020. The city staff trained included Water & Sewer Department staff in charge of operating and maintaining the stormwater and sewer systems, and Engineering Division staff responsible for planning, designing, and constructing infrastructure improvements.

**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:

The only site larger than 1 acre in the MS4 area of the City still in construction this reporting period was 290 Revolution Drive in Assembly Square. This site's plan review took place during permit Year 2 and site inspections have been ongoing.

The City reviews site plans for any construction in the City, irrespective of size, and performs weekly inspections during active construction.

## **MCM5: Post-Construction Stormwater Management in New Development and Redevelopment**

### **As-built Drawings**

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

Number of as-built drawings received:

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

Assembly Block 5B (455 Grand Union) received its Certificate of Occupancy for the base building in May. This project is over 1 acre (71,952 sf) and included direct connections to the dedicated drainage system. The as-built has not been officially accepted by the City yet as the Certificate of Occupancy was conditionally approved.

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

Describe the status of the street design and parking lots assessment due in year 4 of the permit term, including any planned or completed changes to local regulations and guidelines:

As part Somervision 2020 and Somervision 2040, the City is committed to improving transportation experiences for the most vulnerable users: pedestrians, transit riders, and bicyclists. Low impact development will be explored and recommendations and scheduling of projects will be included in this report due in Year 4.

### **Green Infrastructure Report**

Describe the status of the green infrastructure report due in year 4 of the permit term, including the findings and progress towards making the practice allowable:

The City created a Green Stormwater Infrastructure Siting and Planning document a few years ago and that has been successfully used to incorporate green infrastructure into the design and construction of capital projects.

The City will develop a report assessing any City regulations that may prohibit the use of green roofs, infiltration practices, and water harvesting devices, and if such regulations are found to exist, the City will determine what hinders the use of these practices and what changes need to be made to allow them.

### **Retrofit Properties Inventory**

Describe the status of the inventory, due in year 4 of the permit term, of permittee-owned properties that could be modified or retrofitted with BMPs to mitigate impervious areas and report on any properties that have been modified or retrofitted:

As part of an MVP grant, the City identified more than 4 locations suitable for BMPs in MS4 areas of the City. None of these locations have yet been modified or retrofitted.

Additionally, we are working on the two Phosphorus Source Identification Reports for our MS4 areas discharging into the Alewife Brook and the Mystic River. These reports will identify additional retrofit properties.

## **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:

During this reporting period, the City has started an inventory of catch basins and their measurements taken during inspection and cleaning to calculate the percent full of debris. We will update the inventory with the measurements taken during the permit Year 4 cleaning and identify the catch basins that will need to be cleaned twice a year.

### **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:

The City does not have any facilities in the MS4 area that require 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 website(s):

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

**Additional Information**

*Optional:* Enter any additional information relevant to your stormwater management program implementation during the reporting period. Include any BMP modifications made by the MS4 if not already discussed above:

**COVID-19 Impacts**

*Optional:* If any of the above year 3 requirements could not be completed due to the impacts of COVID-19, please identify the requirement that could not be completed, any actions taken to attempt to complete the requirement, and reason the requirement could not be completed below:

**Activities Planned for Next Reporting Period**

Please confirm that your SWMP has been, or will be, updated to comply with all applicable permit requirements including but not limited to the year 4 requirements summarized below. (Note: impaired waters and TMDL requirements are not listed below)

Yes, I agree

- Develop a report assessing current street design and parking lot guidelines and other local requirements within the municipality that affect the creation of impervious cover
- Develop a report assessing existing local regulations to determine the feasibility of making green infrastructure practices allowable when appropriate site conditions exist
- Identify a minimum of 5 permittee-owned properties that could potentially be modified or retrofitted with BMPs to reduce impervious areas

**Annual Requirements**

- Annual report submitted and available to the public
- Annual opportunity for public participation in review and implementation of SWMP
- Keep records relating to the permit available for 5 years and make available to the public
- Properly store and dispose of catch basin cleanings and street sweepings so they do not discharge to receiving waters
- Annual training to employees involved in IDDE program
- Update inventory of all known locations where SSOs have discharged to the MS4
- Continue public education and outreach program
- Update outfall and interconnection inventory and priority ranking and include data collected in connection with the dry weather screening and other relevant inspections conducted
- Implement IDDE program
- Review site plans of construction sites as part of the construction stormwater runoff control program
- Conduct site inspection of construction sites as necessary
- Inspect and maintain stormwater treatment structures
- Log catch basins cleaned or inspected
- Sweep all curbed streets at least annually
- Continue investigations of catchments associated with Problem Outfalls
- Implemented SWPPPs for all permittee owned or operated maintenance garages, public works yards, transfer stations, and other waste handling facilities

- Review inventory of all permittee owned facilities in the categories of parks and open space, buildings and facilities, and vehicles and equipment; update if necessary
- Review O&M programs for all permittee owned facilities; update if necessary
- Implement all maintenance procedures for permittee owned facilities in accordance with O&M programs
- Implement program for MS4 infrastructure maintenance to reduce the discharge of pollutants
- Enclose all road salt storage piles or facilities and implemented winter road maintenance procedures to minimize the use of road salt
- Review as-built drawings for new and redevelopment to ensure compliance with post construction bylaws, regulations, or regulatory mechanism consistent with permit requirements
- Inspect all permittee owned treatment structures (excluding catch basins)

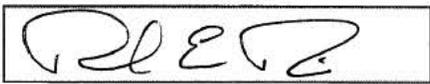
Provide any additional details on activities planned for permit year 4 below:

## Part V: Certification of Small MS4 Annual Report 2021

### 40 CFR 144.32(d) Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, I certify that the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Name: RICHARD E. RAICHE Title: DIRECTOR OF I.A.M.

Signature:  Date: 9/28/2021

*[Signatory may be a duly authorized representative]*