

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: Town of Sudbury

EPA NPDES Permit Number: MAR041224

Primary MS4 Program Manager Contact Information

Name: Dan Nason

Title: Director of Public Works

Street Address Line 1: 275 Old Lancaster Road

Street Address Line 2:

City: Sudbury

State: MA

Zip Code: 01776

Email: nasond@sudbury.ma.us

Phone Number: (978) 440-5421

Stormwater Management Program (SWMP) Information

SWMP Location (web address): <https://sudbury.ma.us/pcd/2020/09/17/sudbury-updates-stormwater-management-program/2021-06-25-sudbury-py3-swmp-update/>

Date SWMP was Last Updated: June 25, 2021

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)			
<i>In State:</i>	☐ Assabet River Phosphorus	☐ Bacteria and Pathogen	☐ Cape Cod Nitrogen
	☐ Charles River Watershed Phosphorus	☐ Lake and Pond Phosphorus	
<i>Out of State:</i>	☐ 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.

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:

Sudbury has a stormwater management bylaw that meets or exceeds requirements in the MS4 General Permit (Permit) for a number of provisions of the Permit. Applicability thresholds for a General Stormwater Management Permit are 5,000 sf disturbance for new and redevelopment, water quality volumes are at the 1-inch design standards and as-builts are required for all projects requiring a Stormwater Management Permit. Sudbury's stormwater and wetland bylaws rely on the MA state stormwater handbook for water quality performance standards. The Town is underway on several updates to zoning and land use regulations consistent with recommendations developed in the 2019 Municipal Vulnerability Preparedness Plan and the MS4 General Permit. COVID and the desire to comprehensively align local land use policy with MVP and MS4 regulations has challenged the schedule for final updates to the Town's water quality performance standards to align more fully with the MS4 General Permit.

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:

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 Town of Sudbury was unable to advance a standard approach to distribute educational materials to dog owners during the renewal of dog licensing due to the effects of COVID-19 on the Town Clerks office.

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:

Not applicable in Permit Year 3. To be considered during stormwater retrofit inventory and phosphorus control planning in Permit Year 4.

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:

A message encouraging proper use of slow-releasing and phosphorus-free fertilizers was distributed July 1st of 2021 on the Town of Sudbury's Facebook page.

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:

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:

Stearns Mill Pond, formerly segment MA82104 on the Impaired Waters List, is now considered to be a part of Hop Brook, segment MA 82A-05. All impairments from Stearns Mill Pond have been added to Hop Brook, so are still accounted for.

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: Targeted Message - Help Needed to Keep Stormwater Drainage Working Properly

Message Description and Distribution Method:

The Town posted a message on their Planning and Community Development page. This message was posted to educate the public on how to properly manage catch basin grates to keep the drainage systems working properly. It advised the public to clear leaves and other debris from catch basin grates near them, sweep debris off of impervious surfaces, dispose of leaf litter and debris in a trash can, and remove snow and ice from catch basin grates in the winter. The post also explained what the simple tasks could do for them, the city, and waterways.

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

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: Targeted Message - Outfall Rehabilitation

Message Description and Distribution Method:

The Town posted a before and after picture of an outfall rehabilitation to their Sudbury DPW Facebook page. This message was used to enhance public awareness of outfall conditions and rehabilitation.

On Facebook, this posting was "liked" 20 times and "shared" 0 times. 442 Facebook users currently "follow" the page and can view the Town's postings in their newsfeed.

Targeted Audience:

Responsible Department/Parties: DPW Operations

Measurable Goal(s):

Post educational messages on the Town website. Maintain educational content throughout the Permit term.

Message Date(s): April 9, 2021

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:

Additional educational content has been posted as needed to address outreach priorities in any given year. This is a supplemental outreach effort.

BMP: Targeted Message - IDDE Investigation Notification and Outreach

Message Description and Distribution Method:

The Town posted a blurb along with flyer attachments on their Sudbury DWP Facebook page. This post was a notification that the Town will be continuing their IDDE investigations. The attachments included information about the Town's drainage systems and their purposes, what the residents could expect when the IDDE inspections resumed, why the IDDE investigations are being performed, and what residents could do to prevent runoff pollution including septic maintenance and pet waste clean up.

On Facebook, this posting was "liked" 7 times and "shared" 4 times. 442 Facebook users currently "follow" the page and can view the Town's postings in their newsfeed.

Targeted Audience: Residents

Responsible Department/Parties: DPW Operations

Measurable Goal(s):

Post educational messages on the Town website. Maintain educational content throughout the Permit term.

Message Date(s): October 30, 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:

IDDE notification and mailings have been developed and implemented to assist in supplemental messaging within bacteria impaired waterbodies.

BMP: Targeted Message - Catch Basin Cleanings

Message Description and Distribution Method:

The Town posted on their Sudbury DPW Facebook page about the beginning of their catch basin cleaning efforts. This post educated the public that the cleaning efforts were being cleaned to comply with the MS4 permit to minimize flooding and to protect water quality by removing trash, sediment, debris, and other solids. It specified that cleaning catch basins prevents clogging, reduces odors, and reduces TSS, nutrient, bacteria, and other pollutant loading to receiving waters.

On Facebook, this posting was "liked" 4 times and "shared" 1 times. 442 Facebook users currently "follow" the page and can view the Town's postings in their newsfeed.

Targeted Audience: Residents

Responsible Department/Parties: DPW Operations

Measurable Goal(s):

Post educational messages on the Town website. Maintain educational content throughout the Permit term.

Message Date(s): September 21, 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:

Additional educational content has been posted as needed to address outreach priorities in any given year. This is a supplemental outreach effort.

BMP: Supplemental Message - Dog Waste in Catch Basins**Message Description and Distribution Method:**

The Town posted on their Sudbury DPW Facebook page about the ongoing catch basin cleanings and their recent discovery of dog waste in catch basins. The post informed the public that the drainage system flows to waterways and not wastewater plants, and that dumping dog waste into the catch basins was not only illegal and prohibited, but could also pose as a public health hazard.

On Facebook, this posting was "reacted to" 12 times and "shared" 7 times. 442 Facebook users currently "follow" the page and can view the Town's postings in their newsfeed.

Targeted Audience: Residents

Responsible Department/Parties: DPW Operations

Measurable Goal(s):

Supplemental message developed and distributed for impaired waters.

Message Date(s): October 26, 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:

BMP: Targeted Message - Cleanup Day Announcement

Message Description and Distribution Method:

The Town posted a flyer about the 2021 Cleanup Day on their Sudbury DPW Facebook page. The flyer asked the public to sign up to "Adopt A Street and to help beautify Sudbury" by participating in the annual, spring roadside cleanup. The post also included a link to more information.

On Facebook, this posting was "liked" 2 times and "shared" 0 times. 442 Facebook users currently "follow" the page and can view the Town's postings in their newsfeed.

Targeted Audience: Residents, Businesses, institutions and commercial facilities

Responsible Department/Parties: DPW Operations

Measurable Goal(s):

Distribute a minimum of 1 additional educational message to each of the 4 target audiences (missing the construction and industrial target audience).

Message Date(s): March 30, 2021

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:

Additional educational content has been posted as needed to address outreach priorities in any given year. This is a supplemental outreach effort.

BMP: Targeted Message - Town of Sudbury Website

Message Description and Distribution Method:

The Town's website includes pages about their comprehensive wastewater management plan (CWMP), interactive, public stormwater map, and updates to their stormwater management program. The CWMP page is a resource to residents, neighborhoods, and businesses that need information and suggestions regarding their wastewater issues and solutions. This site has the capacity to give the public the necessary information to curb potential wastewater leaks, spills, or contaminations that may occur due to certain constraints or issues they are experiencing. The interactive map shows all of the Town's drainage system lines, catch basins, manholes, and outfalls. This information can be used for the public's personal education and awareness. With more people aware of where the stormwater is flowing can even people's behaviors and actions such as blowing leaves into roads, littering, and washing the car in the driveway or road. The stormwater management page contains information about the Town's efforts to comply with the MS4 permit and why along with links to the

DPW's letter to residents and educational flyer about IDDE inspections as well as links to present and past stormwater management plans.

Targeted Audience: Residents

Responsible Department/Parties: DPW Operations

Measurable Goal(s):

Post educational messages on the Town website. Maintain educational content throughout the Permit term.

Message Date(s): Ongoing

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

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

If yes, describe why the change was made:

Additional educational content has been posted as needed to address outreach priorities in any given year. This is a supplemental outreach effort.

Add an Educational Message

MCM2: Public Participation

Describe the opportunity provided for public involvement in the development of the Stormwater Management Program (SWMP) **during this reporting period:**

The Town of Sudbury had their SWMP available at the Department of Public Works and on their website for public viewing and commentary.

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:

Sudbury continues to refine and revise their storm sewer system infrastructure attributes/map. Consistent with the Town's operations programs, staff conduct mapping refinements during capital improvement projects, catch basin and storm sewer cleaning, CCTV inspections and/or other field efforts; in Sudbury, staff use a digital catch basin inspection application that integrates with the Town GIS data. As infrastructure gets built or rehabilitated, updates to the Town GIS are made.

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:

*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:

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:

*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:

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:

Employee Training

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

Pollution prevention and good housekeeping training was conducted in April of 2021. Additionally, the Town's stormwater team (Public Works, Planning, Conservation and Engineering) conduct frequent internal meetings/trainings on various aspects of the compliance program.

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: 44

Number of inspections completed: 107

Number of enforcement actions taken: 3

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

As-built Drawings

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

Number of as-built drawings received: 9

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

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:

Not applicable in Permit Year 3. To be considered during Permit 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:

Not applicable in Permit Year 3. To be considered during Permit Year 4.

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:

Not applicable in Permit Year 3. To be considered during Permit Year 4.

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: 2,719

Number of catch basins cleaned: 2,719

Total volume or mass of material removed from all catch basins: 503.17 tons

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

Total number of catch basins: 3,000

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 necessary, scheduled advancements will be made to prioritize catch basins located at known problem areas (low spots) and near construction activities (roadway construction, residential, commercial, or industrial

development). If inspections and maintenance activities indicate excessive sediment and debris loading (i.e. the sump is more than 50% full during two consecutive routine inspections//cleanings), these catch basins will be marked for more frequent cleaning. Where necessary, street sweeping will be utilized to aid in minimizing catch basin sediment loading.

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:

Spill Prevention, Control and Countermeasure (SPCC) plan was updated at the DPW facility.

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:

Henry L. Hayes, Jr.

Title:

Sudbury Town Manager

Signature:

Date:

Sept 23, 2021

*[Signatory may be a duly authorized
representative]*