

Year 2 Annual Report

Massachusetts Small MS4 General Permit

Reporting Period: July 1, 2019-June 30, 2020

****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, 2019 and June 30, 2020 unless otherwise requested.

Part I: Contact Information

Name of Municipality or Organization: Town of Boylston

EPA NPDES Permit Number: MAR041095

Primary MS4 Program Manager Contact Information

Name: April Steward

Title: Town Administrator

Street Address Line 1: Town Hall

Street Address Line 2: 221 Main Street

City: Boylston

State: MA

Zip Code: 01505

Email: asteward@boylston-ma.gov

Phone Number: (508) 869-0143

Stormwater Management Program (SWMP) Information

SWMP Location (web address): <https://www.boylston-ma.gov/stormwater-committee>

Date SWMP was Last Updated: September 2019

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)			
<input type="checkbox"/> Bacteria/Pathogens	<input type="checkbox"/> Chloride	<input type="checkbox"/> Nitrogen	<input type="checkbox"/> Phosphorus
<input type="checkbox"/> Solids/ Oil/ Grease (Hydrocarbons)/ Metals			
TMDL(s)			
In State:	<input checked="" 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 checked="" type="checkbox"/> Lake and Pond Phosphorus	
Out of State:	<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 2 Requirements

- ☒ Completed Phase I of system mapping
- ☒ Developed a written catchment investigation procedure and added the procedure to the SWMP
- ☒ Developed written procedures to require the submission of as-built drawings and ensure the long term operation and maintenance of completed construction sites and added these procedures to the SWMP
- ☒ Enclosed or covered storage piles of salt or piles containing salt used for deicing or other purposes
- ☒ Developed written operations and maintenance procedures for parks and open space, buildings and facilities, and vehicles and equipment and added these procedures to the SWMP
- ☒ Developed an inventory of all permittee owned facilities in the categories of parks and open space, buildings and facilities, and vehicles and equipment and added this inventory to the SWMP
- ☒ Completed a written program for MS4 infrastructure maintenance to reduce the discharge of pollutants
 - Developed written SWPPPs, included in the SWMP, for all of the following permittee owned or
 - ☐ operated facilities: maintenance garages, public works yards, transfer stations, and other waste handling facilities where pollutants are exposed to stormwater

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 2 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:

The Town has determined that no facilities located within the MS4 require a site-specific SWPPP. The Highway Garage, located adjacent to the urbanized area, maintains its drainage on site and does not connect to the MS4, and therefore does not require a SWPPP under the MS4 Program.

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 outfall and interconnection inventory and priority ranking as needed

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:

Town staff completed a virtual IDDE training on September 10, 2020. This training was intended to be held in-person during Permit Year 2, but was delayed as the training had to be reformatted and recorded so staff could complete the training in accordance with COVID-19 social distancing guidelines.

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)

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

Phosphorus Good Housekeeping: All streets are swept annually in the spring. The Highway Department also sweeps priority areas up to 4 times per year. There are fewer than ten municipal streets within the area of Boylston's MS4 and the Assabet River watershed, many of which are low travel residential streets. The Town did not sweep all streets within this area two times in Permit Year 2, but does plan to increase the sweeping budget in Permit Year 3 to meet this requirement.

Lake and Pond Phosphorus TMDL

☐ Completed Legal Analysis

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 Legal Analysis for the LPCP has been drafted as of the date of this annual report submittal. The Town is currently reviewing and compiling additional information to finalize. Because Newton Pond was removed from the 2016 303(d) list and is considered Category 4c for non-native aquatic plants, we will be working with EPA and MassDEP to determine applicability of the Lake and Pond Phosphorus TMDL requirements in Permit Year 3.

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

Part III: Receiving Waters/Impaired Waters/TMDL

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

☒ Yes

☐ No

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

The Town's NOI listed receiving waters and impairments based on the water quality limited waters in the 2014 303(d) Integrated List. The Town has evaluated changes to the impairments and/or receiving waters based on the final 2016 303(d) Integrated List and enclosed the analysis herein. The enclosed document will be included in the Town's SWMP.

In September 2020, the Town's stormwater consultant completed field investigations to refine the MS4 outfall mapping. Based on these investigations, the Town will be able to remove many outfall points from the inventory because the mapped infrastructure was a culvert, BMP inlet, or private. A summary of the mapping efforts completed and the impact, if any, on the Town's receiving waters and impairments, will be included in the Year 3 Annual Report.

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:Education and Outreach to Residents (Multi-media Methods)

Message Description and Distribution Method:

For most of Permit Year 2, the Town displayed brochures and flyers at Town Hall on the following stormwater-related topics: dog waste and surface water quality, Massachusetts Watershed Protection Act, phosphorus-free fertilizer use, stormwater basins and importance of routine maintenance, proper car washing procedures, swimming pools and surface water quality, and household stormwater pollution prevention. Additionally, the Town posted flyers on leaf litter and ways to compost or properly dispose of leaves on the Town Hall bulletin board. During spring and summer of 2020, Town Hall was closed to the public and brochures were not on display due to COVID-19 safety concerns. The Town moved many of these educational materials to the Stormwater Committee webpage so they could be accessed safely, and also included additional materials that were not previously available at Town Hall..

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

All visitors to Town Hall are reached by this messaging. The educational materials on the Stormwater Committee webpage were available for all visitors of the Town's website.

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:Education and Outreach to Residents (Multi-media Methods)

Message Description and Distribution Method:

Multiple Town Departments and volunteer groups have active Facebook pages, including the Highway Department and Keep Boylston Beautiful volunteer group, where leaf litter collection, yard waste collection, and cleanup events are advertised. The Boylston Highway Department announced on May 5, 2020 that the Town will be accepting Spring yard waste at the Highway Garage. The Keep Boylston Beautiful Facebook

page announced results of the Spring Clean Up on June 7, 2020.

Targeted Audience: Residents

Responsible Department/Parties: Town Administrator with support from DCR

Measurable Goal(s):

475 people follow the Boylston Highway Department Facebook page and 368 people follow the Keep Boylston Beautiful Facebook page. Followers of these Facebook pages are reached by this messaging.

Yard waste post received 3 likes and 2 shares.

Clean up event post received 21 likes, 3 comments, and 7 shares.

Message Date(s): Various

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: Education and Outreach to Developers (Multi-media Methods)

Message Description and Distribution Method:

Informational letters about wetlands permitting, water quality, and stormwater pollution prevention were developed in Permit Year 1, and streamlined into one letter in Permit Year 2. This year, the Town continued to distribute the letter with stormwater permits and also provided the letter as an educational document to visitors of the Conservation Commission office.

Targeted Audience: Developers (construction)

Responsible Department/Parties: Town Administrator with support from DCR

Measurable Goal(s):

2 copies of the letter were issued with Stormwater permits in Year 2, and approximately 12 were distributed to visitors with questions about the permitting process.

Message Date(s): Ongoing

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

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

If yes, describe why the change was made:

BMP: Education and Outreach to Residents (Multi-media Methods)

Message Description and Distribution Method:

The Town maintains a Stormwater Committee page on the Town's website that contains public education materials on stormwater pollution prevention, including seasonal messaging for phosphorus, the "Fowl Water" video, and a link to an EPA article about nutrient pollution. The page also includes information about the Town's MS4 program, including the SWMP, stormwater bylaws, and Year 1 annual report.

Targeted Audience: Residents

Responsible Department/Parties: Town Administrator with support from DCR

Measurable Goal(s):

The Stormwater Committee page and its resources are available to all visitors of the Town's website.

Message Date(s): Ongoing

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

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

If yes, describe why the change was made:

BMP: Education and Outreach to Residents (Multi-media Methods)**Message Description and Distribution Method:**

The DCR incorporated new methods of public outreach due to COVID-19 and promoted online resource sharing. The DCR created activity guides and kiosk posters that are available on watershed education web pages. Additionally, a Virtual Reservoir Tour and Watershed Wildlife videos were created and distributed upon request to replace in-person visits. These educational materials were available to all Boylston residents.

Targeted Audience: Residents

Responsible Department/Parties: DCR

Measurable Goal(s):

The online activity guides created by DCR are available to all visitors of the DCR's webpage.

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:

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 Stormwater Management Plan (SWMP) was made publicly available for review and input on the Town's Stormwater Committee website.

The Conservation Commission held a meeting on February 24, 2020 to discuss updates needed to the Rules and Regulations to meet the revised post-construction stormwater management requirements in the General Permit. State Public Notice requirements were followed for this meeting.

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 of Boylston has created a Keep Boylston Beautiful volunteer organization to raise awareness on the issue of town littering and pollution. Keep Boylston Beautiful conducted two annual Town-wide clean ups in Permit Year 2 with the aid of local volunteers. A Fall clean up was completed on October 19 and 20, 2019 during which 1,000 lbs of litter was collected, and a Spring clean up was conducted on June 6 and 7, 2020 during which 1,349 lbs of litter and recyclables was collected.
- The Town offered Spring yard waste drop off for six days in May 2020.
- Boylston is a member community of the Wachusett Watershed Regional Recycling Center. The Recycling Center holds special collection days, where residents can properly dispose of their household hazardous waste for a small fee.
- The DCR conducted a guided hiking series in which the hike on January 18, 2020 was held in Boylston along Gate 8 of the Wachusett Reservoir and promoted water supply protection and responsible recreation.

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

Below, check all that apply.

The following elements of the Phase I map have been completed:

☒ Outfalls and receiving waters

- ☒ Open channel conveyances
- ☒ Interconnections
- ☒ Municipally-owned stormwater treatment structures
- ☒ Waterbodies identified by name and indication of all use impairments
- ☒ Initial catchment delineations

Optional: Describe any additional progress you made on your map during this reporting period or provide additional status information regarding your map:

The Town of Boylston has completed mapping of all known outfalls and has mapped additional stormwater structures required under the Phase II mapping requirements. The Town has no known interconnections and will update system mapping if any interconnections are located in future fieldwork efforts. In September 2020, the Town refined the outfall mapping by identifying mapped outfall points that are culverts, BMP inlets, or private, which reduced the total number of MS4 outfalls. This information will be provided in the Permit Year 3 Annual Report and further refined during dry weather outfall investigations. The Town will continue to improve the mapping as modifications are made and the IDDE Program is implemented.

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.

- ☐ The outfall screening data is attached to the email submission
- ☐ The outfall screening data can be found at the following website:

N/A

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

Number of outfalls screened:

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.

- ☐ The catchment investigation data is attached to the email submission
- ☐ The catchment investigation data can be found at the following website:

N/A

*Below, report on the number of catchment investigations completed **during this reporting period.***

Number of catchment investigations completed this reporting period:

*Below, report on the percent of catchments investigated **to date.***

Percent of total catchments investigated:

Optional: Provide any additional information for clarity regarding the catchment investigations below:

The Town has not identified any problem catchments.

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.

- ☐ The illicit discharge removal report is attached to the email submission
- ☐ The illicit discharge removal report can be found at the following website:

N/A

*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 the reporting period:**

5 Highway Department staff completed a virtual IDDE Refresher training on September 10, 2020. This training was intended to be held in-person during Permit Year 2, but was delayed as the training had to be reformatted and recorded so staff could complete the training in accordance with COVID-19 social distancing guidelines.

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 number of site plan reviews and site inspections listed in MCM 4 incorporates all construction sites in Town, including those outside of the MS4, because the Town's Stormwater Control By-Law and Boylston Conservation Commission Rules & Regulations for Stormwater are enforced throughout Boylston and those completed by the DCR for projects within the Wachusett Watershed..

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

Ordinance or Regulatory Mechanism

Below, select the option that describes your ordinance or regulatory mechanism progress.

- ☐ Bylaw, ordinance, or regulations are updated and adopted consistent with permit requirements
- ☐ Bylaw, ordinance, or regulations are updated consistent with permit requirements but are not yet adopted
- ☒ Bylaw, ordinance, or regulations have not been updated or adopted

As-built Drawings

Describe the measures the MS4 has utilized to require the submission of as-built drawings and ensure long term operation and maintenance of completed construction sites:

This requirement has been met through adoption of the Boylston Conservation Commission Rules and Regulations for Stormwater. Section 6.0 (I) requires the submission of as-built drawings and Section 13.0 requires ongoing maintenance and inspections for all structural and non-structural stormwater BMPs.

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:

Preparation for the Street Design and Parking Lots Report has not yet begun as this requirement is due in 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:

Preparation for the Green Infrastructure Report has not yet begun as this requirement is due in 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:

Preparation for the Retrofit Properties Inventory has not yet begun as this requirement is due in 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:

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:

N/A, all catch basins are cleaned annually.

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:

☐ Weight of material removed:

O&M Procedures and Inventory of Permittee-Owned Properties

Below, check all that apply.

The following permittee-owned properties have been inventoried:

- ☒ Parks and open spaces
- ☒ Buildings and facilities
- ☒ Vehicles and equipment

The following O&M procedures for permittee-owned properties have been completed:

- ☒ Parks and open spaces
- ☒ Buildings and facilities
- ☒ Vehicles and equipment

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:

SWPPP inspections are N/A - see SWPPP description on Page 2

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:

The Town's Stormwater Control By-law, Article VI, Section 9 of the General By-laws, and the Boylston Conservation Commission Rules and Regulations for Stormwater fulfill part of the MCM 4 and MCM 5 Construction and Post-Construction Stormwater Management requirements. Due to the delay of the MassDEP Stormwater Handbook update and in accordance with the revised schedule in the proposed General Permit modifications, the Town's regulatory mechanism is currently undergoing review and will be updated as needed for consistency with the revised General Permit requirements in Permit Year 3.

Catch Basin Cleaning: There are 530 Town-owned catch basins, 196 of which are located inside the MS4 permitted area. The Town cleans all catch basins annually. Note that the volume of material removed reported is an estimate.

COVID-19 Impacts

Optional: If any of the above year 2 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 3 requirements summarized below. (Note: impaired waters and TMDL requirements are not listed below)

Yes, I agree ☒

- Inspect all outfalls/ interconnections (excluding Problem and Excluded outfalls) for the presence of dry weather flow
- Complete follow-up ranking as dry weather screening becomes available

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 uncurbed streets at least annually
- Continue investigations of catchments associated with Problem Outfalls
- 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

Provide any additional details on activities planned for permit year 3 below:

The Town acknowledges the General Permit Year 3 requirements and intends to complete as many activities as possible based on funding and staff availability.

Part V: Certification of Small MS4 Annual Report 2020**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.

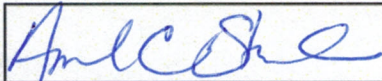
Name:

April Steward

Title:

Town Administrator

Signature:



Date:

9/29/2020

[Signatory may be a duly authorized representative]