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: | Bridgewater S | tate University | | |
|--|-----------------|--|--|--|
| EPA NPDES Permit Number: MAR04 | 2027 | | | |
| Primary MS4 Program Manager Con | ntact Informat | tion | | |
| Name: Karen Johnson Jason | | Title: Vice President of Operations | | |
| Street Address Line 1: Division of Ope | rations | | | |
| Street Address Line 2: Boyden Hall, 13 | 1 Summer Stre | eet, Room 216 | | |
| City: Bridgewater | State: MA | Zip Code: 02325 | | |
| Email: kjason@bridgew.edu | | Phone Number: (508) 531-2750 | | |
| Stormwater Management Program (| | | | |
| SWMP Location (web address): https:/ | /www.bridgew | .edu/office/stormwater-management | | |
| Date SWMP was Last Updated: Jun 30 |), 2021 | | | |
| If the SWMP is not available on the we | b please provid | de the physical address: | | |
| Office of Environmental Health and Sa | fety (Operation | ns Center), 200 Great Hill Drive, Room 221 | | |

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

| nere. nups.// | www.epa.gov/imai/region-1 | -umpun ea-waters-ai | na-303a-usis-siale | | | | |
|--|---|--|--|--|--|--|--|
| Impairment(| <u>(s)</u> | | | | | | |
| | | ☐ Chloride | | ☐ Phosphorus | | | |
| | ☐ Solids/ Oil/ Grease (Hy | drocarbons)/ Metal | S | | | | |
| TMDL(s) | | | | | | | |
| In State: | ☐ Assabet River Phospho | orus 🛛 Bacte | eria and Pathogen | ☐ Cape Cod Nitrogen | | | |
| | ☐ Charles River Watersh | ed Phosphorus | Lake and Pond | l Phosphorus | | | |
| Out of State: | ☐ Bacteria/Pathogens | ☐ Metals | ☐ Nitrogen | ☐ Phosphorus | | | |
| | | | CI | ear Impairments and TMDLs | | | |
| you have com | ff all requirements below the spleted that permit requirent dditional information will be | nent fully. If you ha | ve not completed a re | ch box you are certifying that equirement leave the box | | | |
| Year 3 Requir | rements | | | | | | |
| | ted and screened all outfalls | /interconnections (e | xcluding Problem an | d Excluded outfalls) | | | |
| □ Update weather | ed outfall/interconnection pr r inspections as necessary | iority ranking based | on the information of | collected during the dry | | | |
| | onstruction bylaw, ordinance ermit requirements | e, or other regulator | y mechanism was up | dated and adopted consistent | | | |
| any additiona impacts of Co attempt to con | you would like to describe p l information, and/or if any OVID-19, please identify the mplete the requirement, and | of the above year 3 e requirement that c reason the requirem | requirements could rould not be complete nent could not be con | not be completed due to the ed, any actions taken to appleted below: | | | |
| updated and a | struction Stormwater Mana adopted by the BSU Stormwapital Planning position, wh | vater Committee. No | ote that BSU is curren | ntly working to fill the | | | |
| Annual Requi | <u>rements</u> | | | | | | |
| | ed an opportunity for public rate Public Notice requireme | | iew and implementat | tion of SWMP and complied | | | |
| ⊠ Kept re | ecords relating to the permit | available for 5 year | s and made available | to the public | | | |
| 1 1 | 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
 ⑥ This is not applicable because we did not find any new SSOs

| | The updated SSO inventory is attached to the email submission |
|-------------|--|
| | C The updated SSO inventory can be found at the following website: |
| | |
| \boxtimes | Properly stored and disposed of catch basin cleanings and street sweepings so they did not discharge to receiving waters |
| \boxtimes | Provided training to employees involved in IDDE program within the reporting period |
| \boxtimes | All curbed roadways were swept at least once within the reporting period |
| \boxtimes | Updated system map due in year 2 as necessary |
| \boxtimes | Enclosed all road salt storage piles or facilities and implemented winter road maintenance procedures to minimize the use of road salt |
| \boxtimes | Implemented SWPPPs for all permittee owned or operated maintenance garages, public works yards, transfer stations, and other waste handling facilities |
| \boxtimes | Updated inventory of all permittee owned facilities as necessary |
| \boxtimes | O&M programs for all permittee owned facilities have been completed and updated as necessary |
| \boxtimes | Implemented all maintenance procedures for permittee owned facilities in accordance with O&M programs |
| X | 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:

The Town of Bridgewater routinely sweeps streets as part of its annual roadway maintenance program. The majority of streets on BSU's campus are owned by the Town of Bridgewater. Campus parking lots are regularly inspected and cleaned for trash by Facilities Management. BSU was unable to schedule a meeting with the Town of Bridgewater in year 3 to coordinate sweeping efforts. BSU will attempt to meet with the Town in year 4.

There were no updates necessary for the inventory of all permittee owned facilities.

The majority of catch basins on campus were inspected during the reporting period. Due to the timing of inspections, catch basins flagged for cleaning will be cleaned in year 4.

Several structural BMPs were informally inspected during site visits to update system mapping with structure naming. However, due to the disruptions in usual Facilities Management operations and staffing as a result of COVID-19, formal inspections and maintenance of structural BMPs could not be completed within the reporting period. The rain garden in the Green Parking Lot was inspected and 4 catch basins were cleaned out on 05/26/21 in association with its maintenance. BMP inspections will be contracted out for year 4.

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

<u>Annual Requirements</u>

Public Education and Outreach*

Annual message was distributed encouraging the proper management of pet waste, including noting any existing ordinances where appropriate

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|--|-----------------------|
| Permittee or its agents disseminated educational material to dog owners at the time of renewal of dog license, or other appropriate time | |
| Provided information to owners of septic systems about proper maintenance in any odischarges to a water body impaired for bacteria | |
| * Public education messages can be combined with other public education requirement Appendix H and F for more information) | 's as applicable (see |
| Optional: If you would like to describe progress made on any incomplete requirements listed any additional details, please use the box below: | ed above or provide |
| BSU has a formalized Pet Policy and requires all new pet owners on campus to sign the Pet pet waste management stations installed at walking trails on campus with educational mess signage at the stations. | aging displayed on |
| There are no septic systems on campus. The entire campus is on the Town of Bridgewater | sewer system. |
| Nitrogen (Combination of Impaired Waters Requirements and TMDL Requirements as Apparents Annual Requirements | plicable) |
| Public Education and Outreach* | |
| Distributed an annual message in the spring (April/May) that encourages the proper use of slow-release fertilizers | use and disposal of |
| Distributed an annual message in the summer (June/July) encouraging the proper ma waste, including noting any existing ordinances where appropriate | nagement of pet |
| Distributed an annual message in the fall (August/September/October) encouraging to of leaf litter | |
| * Public education messages can be combined with other public education requirements (see Appendix H and F for more information) | s as applicable |
| Good Housekeeping and Pollution Prevention for Permittee Owned Operations | l'att David |
| Increased street sweeping frequency of all municipal owned streets and parking lots spart 2.3.7.a.iii.(c) to a minimum of two times per year (spring and fall) | subject to Permit |
| Potential structural BMPs | |

Any structural BMPs listed in Table 3 of Attachment 1 to Appendix H already existing or installed in the regulated area by the permittee or its agents was tracked and the nitrogen removal by the BMP was

estimated consistent with Attachment 1 to Appendix H. The BMP type, total area treated by the BMP, the design storage volume of the BMP and the estimated nitrogen removed in mass per year by the BMP were documented.

| • The BMP inform | nauon is | allached | to the | eman | Sudiiissidi |
|------------------|----------|----------|--------|------|-------------|
|------------------|----------|----------|--------|------|-------------|

| 0 | 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 Town of Bridgewater routinely sweeps streets as part of its annual roadway maintenance program. The majority of streets on BSU's campus are owned by the Town of Bridgewater. Campus parking lots are regularly inspected and cleaned for trash by Facilities Management. As a result of COVID-19, BSU was

| unable to schedule a meeting with the Town of Bridgewater in year 3 to coordinate sweeping efforts. | BSU |
|---|-----|
| will attempt to meet with the Town in year 4. | |
| The nitrogen removal for each structural RMP was undeted this reporting period and is attached | |

| | x below to provide a | any additional in | formation you wo | ould like to share as | part of you |
|--------------|----------------------|-------------------|------------------|-----------------------|-------------|
| -assessment: | | | | | |
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Part III: Receiving Waters/Impaired Waters/TMDL

| Have you made submitted? | e any changes to your lists of receiving waters, outfalls, or impairments since the NOI was |
|--------------------------|---|
| 0 | Yes |
| • | No |
| If yes, describe | e below, including any relevant impairments or TMDLs: |
| | |
| | |
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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: 5 |
| 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:Electronic Brochures/Handouts |
| Message Description and Distribution Method: |
| Email and pamphlets with educational material on pathogen-related maintenance practices for stormwater management sent in BSU's Community Announcements to all faculty and staff. |
| Targeted Audience: Faculty and staff (due to COVID-19, majority of students were no longer on campus) |
| Responsible Department/Parties: EH&S - Patricia Delaney |
| Measurable Goal(s): |
| Inspection of campus grounds during routine maintenance by Facilities Management staff will be used to assess the overall effectiveness of the educational program. |
| Message Date(s): 05/20/21, 05/25/21, and 06/02/21 |
| Message Completed for: Appendix F Requirements ☑ Appendix H Requirements ☑ |
| Was this message different than what was proposed in your NOI? Yes C No • |
| If yes, describe why the change was made: |

BMP:Electronic Brochures/Handouts

Message Description and Distribution Method:

Email and pamphlets with educational material on nitrogen-related maintenance practices for stormwater management sent in BSU's Community Announcements to all Facilities Maintenance Grounds staff

Targeted Audience: Facilities Management Grounds staff

Responsible Department/Parties: EH&S - Patricia Delaney

Measurable Goal(s):

Targeted inspections by Facilities Management senior personnel will be used to assess the overall effectiveness of the educational program.

| Message Date(s): 11/04/20 and 05/18/21 | |
|---|---------|
| Message Completed for: Appendix F Requirements ☐ Appendix H Requirements ☐ | |
| Was this message different than what was proposed in your NOI? Yes • No C | |
| If yes, describe why the change was made: | |
| BSU was notified by EPA via email on 03/13/19 that the Taunton River Watershed discharges to water tributary to water(s) impaired due to nitrogen (Mount Hope Bay) and therefore must adhere to the requirements in Appendix H Part I. | rbodies |
| BMP:School Curricula/Programs | |
| Message Description and Distribution Method: | |
| School curricula/programs including stormwater management/issues as a topic offered in various seme SUST101 - Sustainability (water management) BIOL117 - Environmental Biology GEOG130 - Environmental Geography GEOL194 - Environmental Geology CHEM290 - Environmental Chemistry CHEM486 - Advanced Environmental Chemistry Lab CHEM489 - Advanced Environmental Chemistry | sters: |
| Targeted Audience: Students | |
| Responsible Department/Parties: Faculty | |
| | |
| Measurable Goal(s): The frequency and registration of classes will be used to assess the overall effectiveness of the education program. | nal |
| Message Date(s): SUST101, BIOL117, GEOG130, and GEOG194 offered in Fall 2020 and Spring 2021. CHEM486 and CHEM489 offered in Spring 2021. | 1. |
| Message Completed for: Appendix F Requirements ☐ Appendix H Requirements ☐ | |
| Was this message different than what was proposed in your NOI? Yes O No • | |
| If yes, describe why the change was made: | |
| | |
| BMP:Public Outreach Class | |
| Message Description and Distribution Method: | |
| The Watershed Access Lab offers a class module called "Does This Parking Lot Look Green to You?" | on a CC |
| Educators can bring their middle school or high school students to learn about hydrology, stormwater re | unott. |

and the use of low impact design for improving water quality. Several hundred students attend each year

mostly from southeastern Massachusetts.

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| | |

| Responsible Department/Parties: EH&S - Patricia Delaney | | | | | | | |
|--|--|--|--|--|--|--|--|
| Measurable Goal(s): | | | | | | | |
| The number of attendees will be used to assess the overall effectiveness of the educational program. | | | | | | | |
| Message Date(s): 04/28/21 | | | | | | | |
| Message Completed for: Appendix F Requirements Appendix H Requirements | | | | | | | |
| Was this message different than what was proposed in your NOI? Yes © No O | | | | | | | |
| If yes, describe why the change was made: | | | | | | | |
| The workshop was incorporated with the Public Outreach and Participation Meeting to provide background information about why managing stormwater is important prior to reviewing elements of the SWMP and opening the meeting to questions and comments. This format was determined to be more efficient and effective to provide a more comprehensive experience for attendees going forward. | | | | | | | |
| MCM2: Public Participation Describe the opportunity provided for public involvement in the development of the Stormwater Management Program (SWMP) during this reporting period: | | | | | | | |
| BSU Public Outreach and Participation Meeting was held virtually on 04/28/21. At the meeting, the BSU community was provided information and updates on the SWMP, on how to get involved, and to report stormwater-related problems or concerns to EH&S. Meeting attendees were encouraged to ask questions verbally or using the chat feature. | | | | | | | |
| Was this opportunity different than what was proposed in your NOI? Yes O No . | | | | | | | |
| Describe any other public involvement or participation opportunities conducted during this reporting period: | | | | | | | |
| SWMP was publicly available at EH&S Office. | | | | | | | |
| BSU Stormwater Management Program Committee met 7 times during the reporting period (11/10/20, 01/05/21, 02/09/21, 03/02/21, 04/06/21, 05/11/21, 06/08/21). All Committee meetings were held virtually. | | | | | | | |
| | | | | | | | |

MCM3: Illicit Discharge Detection and Elimination (IDDE)

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 | | | | |
|--|--|--|---|--|--|
| C | | | | | |
| C | C The catchment investigation data can be found at the following website: | | | | |
| | | | | | |
| Below, report | on the number of catchment investigation | ns completed | during this reporting period. | | |
| - | Number of catchment investigations con | mpleted this | reporting period: 0 | | |
| Below, report | on the percent of catchments investigated | d to date. | | | |
| | Percent of total catchments investigated | l: 0 | | | |
| Optional: Pro | vide any additional information for clarit | y regarding | the catchment investigations below: | | |
| for dry weather receiving water examining its inventory. By | er screening and sampling. BSU spent co ers and neighboring MS4s (including the system mapping and ultimately increasing | onsiderable e Town of Bri ng the number ne outfalls fro | dgewater and MBTA) by carefully or of outfalls and interconnections in its or dry weather screening and may find that | | |
| date of discove schedule of ren © | ry; and date of elimination, mitigation, o | or enforceme | e email submission | | |
| | on the number of illicit discharges identij | fied and rem | oved, along with the volume of sewage | | |
| removed durin | g this reporting period. | | 7 | | |
| | Number of illicit discharges identified: | 3 | | | |
| | Number of illicit discharges removed: | 0 | | | |
| | Estimated volume of sewage removed: |) | gallons/day | | |
| • | on the total number of illicit discharges id illicit discharges identified and removed : | | removed to date. At a minimum, report on ective date of the permit (July 1, 2018). | | |
| | Total number of illicit discharges identif | fied: 0 | | | |
| | Total number of illicit discharges remov | ed: 0 | | | |
| | 2 | | | | |

As-built drawings are required to be submitted at the conclusion of construction projects per the Post-

Construction Stormwater Management in New Development and Redevelopment policy. Facilities Management will be responsible for the long-term O&M of stormwater BMPs at completed construction sites and will be added to the inventory of stormwater treatment structures for annual maintenance.

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:

| BSU will assess potential changes to street and parking lot design guidelines 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:

As a non-traditional MS4, BSU is not required to meet the requirements of part 2.3.6.c.

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:

BSU will evaluate campus properties that can be modified or retrofitted with BMPs to mitigate impervious areas in 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: 145

Number of catch basins cleaned: 4

Total volume or mass of material removed from all catch basins: 400 cubic feet

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

Total number of catch basins: 149

| If applicable: Report on the actions taken if a catch basin sump i inspections/cleaning events: | s more than 50% full during two consecutive routine |
|---|--|
| | |
| Street Sweeping | |
| Report on street sweeping completed during this re | eporting period using one of the three metrics below. |
| Number of miles cleaned: 30 | |
| O Volume of material removed: | [Select Units] |
| C Weight of material removed: | [Select Units] |
| Describe any corrective actions taken at a facility v | with a SWPPP: |
| Monitoring or Study Results Results from any other stormwater or receiving was | nal Information ter quality monitoring or studies conducted during the here the data is being used to inform permit compliance or |
| Not applicable | |
| | or studies are attached to the email submission or studies can be found at the following website(s): |
| • | |
| | our behalf or if monitoring or studies conducted by other the type of information gathered or received shall be |
| | |

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:

Used motor oil from BSU fleet vehicles is sent off-site for recycling.

Recyclable materials are managed through the campus Recycling Program.

BSU installed 5 pet waste management stations at walking trails on campus in fall 2019. The stations include display signage related to pathogen messaging. The stations were inspected and refilled with bags on 06/01/21.

The target audience for the annual educational messages in the fall and spring on nitrogen-related maintenance practices for stormwater management was modified to the Facilities Maintenance Grounds staff, which handles all landscape maintenance on campus.

The majority of catch basins on campus were inspected during the reporting period; 4 catch basins could not be inspected as one was not accessible and the others had grate openings that were too small for the measuring stick that was used for the inspections.

The 192 SWPPP inspections includes monthly underground storage tank inspections at two locations (the Operations Center and the Power Plant) and monthly inspections of diesel emergency generators at 14 locations throughout campus.

BSU's Spill Prevention, Control, and Countermeasure Plan prepared by The Environmental Corp. was updated in June 2021.

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:

Several structural BMPs were informally inspected; however, due to the disruptions in usual Facilities Management operations and staffing as a result of COVID-19, formal inspections and maintenance of structural BMPs could not be completed within the reporting period. The rain garden in the Green Parking Lot was inspected and 4 catch basins were cleaned out on 05/26/21 in association with its maintenance. Catch basin inspection was ultimately contracted out, but due to the timing of the inspections, catch basins flagged for cleaning will be cleaned in year 4. Catch basin inspections, as well as BMP inspections, will be contracted out for year 4.

Public Outreach class module called "Does This Parking Lot Look Green to You?" was not offered this reporting period due to COVID-19.

Annual Earth Day clean-up involving administrators, faculty, staff, students, and campus fraternities was canceled as a result of COVID-19.

MassDOT training for winter road maintenance could not be completed this reporting period as it was not offered due to COVID-19.

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:

The Post-Construction Stormwater Management in New Development and Redevelopment policy will be reviewed with the new Director of Capital Planning once hired, adjusted as necessary, and implemented accordingly.

Catch basins flagged for cleaning will be cleaned in year 4.

Catch basin inspections, as well as structural BMP inspections, will be contracted out for year 4.
BSU will attempt to meet with the Town of Bridgewater in year 4 to coordinate efforts around street sweeping, winter road maintenance, catchment investigations, SSO reporting, training and other points of coordination.

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: | Karen Jason | Title: Vic | e President of Operations | |
|-------|---|------------|---------------------------|--|
| | [Signatory may be a duly authorized representative] | Date: q | 24/2021 | |