

2016 NPDES UPDATE to the BOARD OF SELECTMEN

I. Introduction

- A. Needham has been complying with the EPA's 2003 NPDES Permit since July 1, 2003. Prior to that date, the Town has been in compliance with an MOU signed by the Town in June 1996. The Town has made significant improvements to its Stormwater Quality since then.
- B. The new 2016 NPDES Regulations are the most sweeping set of stormwater requirements in the last 45 years. Fortunately, Needham began planning stormwater improvements early on and will be able to take credit for much of its past improvements under the new Permit. Even with its past successes, the new regulations will require substantial changes to the Town's Stormwater Operations, Site Plan and Subdivision Reviews, and the creation of a new Stormwater General Bylaw. The Permit application is required to be submitted by September 28, 2017. A request for funding should be made at the October 5, 2016 Special Town Meeting to begin the Permit application work.
- C. All urbanized areas located within Needham which have a Small Municipal Separate Storm Sewer System (MS4) are required to be covered by a Permit. The Permit only authorizes the discharge of clean stormwater and/or stormwater that does not cause or contribute to an exceedance of water quality standards. The Permit also requires that pollutants in MS4 stormwater discharges be reduced to the maximum extent practicable.
- D. Needham is subject to a Total Maximum Daily Load (TMDL) requirement for phosphorus and pathogens. All stormwater discharges from urbanized areas must reduce the amount of phosphorus discharging to waterbodies and the tributaries thereto by 45 percent (45%) and pathogens must be eliminated and/or reduced to the maximum extent practicable through the use of enhanced structural and non-structural BMPs.
- E. Needham also has five (5) Water Quality Limited Waters impaired by turbidity, nutrients, organic enrichment/low dissolved oxygen, priority organics, noxious aquatic plants, exotic species, oil & grease, taste, odor, color, suspended solids, and causes unknown. The five waterbodies impaired are: Alder Brook, Charles River (segment South Natick Dam to Chestnut Street), Charles River (Chestnut Street to Watertown Dam), Fuller Brook, and Rosemary Brook. All five waterbodies are classified as Category 5 Waters.
- F. An enhanced Storm Water Management Program (SWMP) is required to address the impairments listed above and any other impairments that the Town becomes aware of as a result of activities required or voluntarily taken under the 2016 NPDES Permit.

II. 2016 NPDES Permit Requirements

- A. The new 2016 Regulations kept the same basic format as the 2003 Permit. The Regulations are divided up into Six (6) Minimum Control Measures:
 - 1. Public Education and Outreach
 - 2. Public Participation and Involvement
 - 3. Illicit Discharge Detection and Elimination
 - 4. Construction Site Runoff Control
 - 5. Post-Construction Runoff Control
 - 6. Pollution Prevention/Good Housekeeping

B. Each of the Control Measures minimum requirements has been significantly increased.

1. Public Education and Outreach

- a. The new regulations require that 4 specific audiences be targeted: Residential, Business/Commercial, Developers/Construction, and Industrial.
- b. Each audience must receive at least 2 focused notices within the 5 year Permit term spaced at least a year apart.
- c. Significant documentation, tracking, reporting and effectiveness evaluations are required with immediate changes required to the program for any effort deemed ineffective.

2. Public Participation and Involvement

- a. Opportunities for the Public to participate in the Storm Water Management Program (SWMP) must be created by holding hearings compliant with the Open Meeting Law once each year for 5 years.
- b. The SWMP must be posted on the Town's website during the 5 year Permit term with updates to the program as they occur.
- c. Tracking and reporting requirements are also required.

3. Illicit Discharge Detection and Elimination (IDDE)

- a. A Stormwater General Bylaw must be created to prevent and prohibit sanitary sewage connections and Sanitary Sewer Overflows (SSOs) to the stormwater drainage system.
- b. A Study is required to be performed on all SSOs within the past five (5) years with data on the incidents, mapping, analysis and resolutions preventing future occurrences by July 1, 2018. Thereafter, the status, mitigation and corrective measures must be reported each year in the Annual Report.
- c. The 2016 IDDE minimum control measure requires a revised and more detailed Map than the one required for the 2003 Permit. The additional and revised information required to be shown on the 2016 map must be submitted in two phases. The first phase must be completed by July 1, 2019 and requires:
 - i. All swales, ditches, and water conveyances to be shown
 - ii. All interconnections with other MS4's and other storm sewer systems be shown
 - iii. All municipal stormwater treatment structures (BMPs) be shown
 - iv. All water bodies be identified by name with all use impairments identified
 - v. Catchment areas to be delineated for every outfall and interconnection
- d. The second phase requires:
 - i. Refinement of all catchment areas in accordance with detailed mandated procedures identified in the 2016 NPDES regulations. All outfalls (295 of them) and interconnections (to adjacent municipalities and private property connections) must be completed by July 1, 2027.
 - ii. The sanitary sewer system in relation to the stormwater drainage system must be shown on the 2016 map in its entirety by July 1, 2027.
 - iii. There is a list of 10 additional recommended items or groups of items that EPA would like to see incorporated into the 2016 mapping.
 - iv. A written IDDE Program must be created detailing the lead department responsible for implementing the program as well as other agencies involvements, coordination and data sharing.

- v. The IDDE Program shall include the procedures and timelines demonstrating compliance with the 2016 regulations.
- vi. The Program shall also include:
 - 1. Assessment and initial ranking of all outfalls and interconnections for potential illicit connections and SSOs and the related public health significance. The ranking shall provide a prioritization for screening of outfalls by dry weather testing and a prioritization for catchment investigations. The ranking shall be classified into one of four categories: Problem Outfalls; High Priority Outfalls; Low Priority Outfalls, and; Excluded Outfalls and must be completed by July 1, 2018.
 - 2. All High Priority and Low Priority outfalls and interconnections must be inspected and screened by July 1, 2020. There are multiple screening parameters that must be followed, including re-testing of samples that test positive for contamination.
 - 3. A written Catchment Investigation procedure must be developed by December 31, 2018 and investigations of Problem Outfalls/Interconnections must begin by July 1, 2019 and be completed by July 1, 2024.
 - 4. System Vulnerability Factors (SVFs) (8 predefined/required and 4 recommended) must be identified within each Catchment Area in accordance with the 2016 regulations. Any Catchment Area exhibiting at least one (1) SVF is required to have its outfall/interconnection undergo wet weather sampling.
 - 5. Dry and wet weather sampling shall continue until the source of contamination has been identified and removed. Once the illicit connection or contamination source has been verified removed, dry weather and potentially wet weather screening shall be conducted once every five (5) years thereafter.

4. Construction Site Stormwater Runoff Control

- a. A Stormwater General Bylaw must be created to address sediment and erosion control at construction sites. The bylaw must also include controls for demolition debris, litter, concrete truck washouts, chemicals, and sanitary wastes. The bylaw should enact regulations that specify the enforcing person or agency, the procedures to be followed, and any sanctions that may be applied to the extent authorized by law. The enacted regulations may impose controls minimizing the amount of disturbed areas and/or protection of existing natural resources such as trees or land in its natural state; stabilization of sites and/or sloping areas when projects are complete or when operations have temporarily ceased; protection of all downstream inlets, including catch basins; perimeter controls, such as silt socks and hay bales; stabilization of construction entrances/exits to prevent offsite tracking of soils, and; street sweeping.
- b. Written procedures for site plan review, inspection, and enforcement are required by July 1, 2018. The procedures shall include:
 - i. A preconstruction review by the permittee of the site design
 - ii. The planned operations at the construction site
 - iii. The planned BMPs during the construction phase
 - iv. The planned BMPs to be used to manage runoff created after development
 - v. Consideration of potential water quality impacts
 - vi. The receipt and consideration of information submitted by the public
 - vii. The evaluation of opportunities for use of low impact design and green infrastructure

- viii. Site inspections by the permittee during the construction of BMPs and after BMPs have been installed to insure they are working as designed
- ix. Qualification requirements of the permittee's inspectors to perform the necessary inspections, the use of mandated inspection forms, and tracking the number of site reviews, inspections, and enforcement actions

5. Post Construction Stormwater Management

- a. A Stormwater General Bylaw must be created to address onsite infiltration, small diameter drain connections, and contributions to a communal infiltration system (if warranted) by July 1, 2019. The goal of this Minimum Control Measure is to reduce the discharge of pollutants found in stormwater through the retention and/or treatment of stormwater after construction of new or redeveloped sites. The bylaw and/or accompanying regulations created thereunder shall require that as-built drawings and a long term stormwater Operation & Maintenance program be submitted within two (2) years after the completion of each construction project. The bylaw shall also require that an annual certification be submitted documenting the work that has been done over the previous 12 months to properly operate and maintain the stormwater control measures.
- b. The 2016 NPDES regulations mandate that the bylaw and/or the accompanying regulations created thereunder also include provisions that, at a minimum, require the following for land disturbances or a combination of land disturbances of one (1) acre or more:
 - i. Low Impact Development (LID) site planning and design strategies be used to the maximum extent feasible
 - ii. Compliance with Volume 2 of the Massachusetts Stormwater Handbook for the design of stormwater treatment and infiltration practices
 - iii. Prevention of any new stormwater conveyances from discharging untreated stormwater on new development sites, and prevention of any new stormwater conveyances from discharging untreated stormwater to the maximum extent feasible on redevelopment sites, in accordance with Massachusetts Stormwater Handbook Standard 1
 - iv. Control peak runoff rates on new development sites, and control peak runoff rates on redevelopment sites to the maximum extent feasible, in accordance with Massachusetts Stormwater Handbook Standard 2
 - v. Recharge groundwater on new development sites, and recharge groundwater on redevelopment sites to the maximum extent feasible, in accordance with Massachusetts Stormwater Handbook Standard 3
 - vi. Eliminate or reduce the discharge of pollutants on new development sites from land uses with higher pollutant loads, and eliminate or reduce the discharge of pollutants on redevelopment sites from land uses with higher pollutant loads to the maximum extent feasible, in accordance with Massachusetts Stormwater Handbook Standard 5
 - vii. Protect Zone II or Interim Wellhead Protection Areas of public water supplies on new development sites, and protect Zone II or Interim Wellhead Protection Areas of public water supplies on redevelopment sites to the maximum extent feasible, in accordance with Massachusetts Stormwater Handbook Standard 6
 - viii. Implement long term maintenance practices on new development and redevelopment sites in accordance with Massachusetts Stormwater Handbook Standard 9
 - ix. Require that all stormwater management systems on new development sites be designed to retain a minimum of one (1) inch of stormwater runoff from all impervious areas on post-development sites OR perform a complex set of

calculations to demonstrate Total Suspended Solids (TSS) and Total Phosphorus (TS) removal rates will be met as required by the 2016 NPDES regulations

- x. Require that all stormwater management systems on redevelopment sites be designed to retain a minimum of eight tenths (0.8) of an inch of stormwater runoff from all impervious areas on post-development sites OR perform a complex set of calculations to demonstrate Total Suspended Solids (TSS) and Total Phosphorus (TS) removal rates will be met as required by the 2016 NPDES regulations
- c. Stormwater management systems on redevelopment sites may use offsite mitigation within the same watershed area.
- d. Roadway maintenance activities on existing roads that result in the widening of the pavement by less than one lane, adding shoulders, correcting substandard intersections, improving existing drainage systems, and repaving/resurfacing projects shall improve existing conditions where feasible and are exempt from the requirements regarding new untreated stormwater conveyances (#3 above), peak rate of runoff control (#4 above), and groundwater recharge (#5 above).
- e. A Report assessing Needham's current street and parking lot design guidelines and other local requirements that affect the creation of impervious cover is required to be submitted to the EPA by July 1, 2021. The assessment shall discuss whether impervious cover can be reduced in roadway and parking lot design and how it might be achieved. The assessment shall include recommendations and proposed schedules for incorporating policies and standards into relevant documents and procedures in order to minimize impervious cover. The status of the planned or completed changes to the local policies and/or standards shall be reported in each annual report.
- f. A Report assessing Needham's local regulations to determine the feasibility of making, at a minimum, the following practices allowable when appropriate site conditions exist is required to be submitted to the EPA by July 1, 2021:
 - i. Green roofs
 - ii. Infiltration practices such as rain gardens, curb extensions, planter gardens, porous and pervious pavements, and other designs to manage stormwater using landscaping and structured or augmented soils
 - iii. Water harvesting devices such as rain barrels, cisterns, and the use of stormwater for non-potable uses
- g. The assessment should indicate if the practices are allowed and under what circumstances they are allowed. If the practices are not allowed, the assessment shall determine what hinders the use of these practices and what changes in local regulations may be made to make them allowable. The assessment shall include a schedule for the implementation of the changes and shall report the status of the changes in each annual report.
- h. A Report assessing at least five (5) of Needham's publicly owned properties that could potentially be modified or retro-fitted with BMPs designed to reduce the frequency, volume, and pollutant loads of stormwater discharges to and/or from its properties through the reduction of Impervious Area (IA) shall be submitted to the EPA by July 1, 2021. The assessment shall consider at, a minimum, properties with significant impervious cover for retro-fitting and/or modification, access for maintenance purposes, subsurface geology, depth to water table, proximity to aquifers, subsurface infrastructure including sanitary sewers and septic systems, and opportunities for public

use and education. The assessment shall be prioritized with consideration given to existing CIP schedules and proposed paving projects, drain capacity projects; water quality limited waters, public swimming beaches, and drinking water supply sources. Additional Town owned properties shall be identified for retro-fit and/or modification beginning with the May 1, 2022 annual report so that a minimum of five (5) properties will be maintained in the inventory for retro-fit and/or modification each year thereafter. The annual report shall include information on all Town properties that have been retro-fitted and/or modified with BMPs to mitigate IA each year and may include private properties that have been retro-fitted and/or modified to mitigate IA.

6. Good Housekeeping and Pollution Prevention

- a. An Operations & Maintenance (O&M) Program shall be submitted to the EPA for all Town owned properties and operations to prevent or reduce pollutant runoff and protect water quality. The O&M program shall be submitted as part of the Stormwater Management Program (SWMP) required in the 2003 NPDES Permit. By July 1, 2019, an inventory of all Town owned properties and facilities shall be created and shall address the listed issues within the following categories:

i. Parks and Open Space

1. Establish procedures to address proper use, storage, and disposal of pesticides, herbicides, and fertilizers
2. Evaluate lawn maintenance, reduced lawn mowing, disposal of lawn clippings, and drought resistant plantings practices
3. Establish pet waste collection and disposal locations, and signage
4. Establish water fowl procedures or practices to reduce water fowl droppings
5. Establish procedures for the management of trash containers
6. Establish procedures to address erosion or poor vegetative cover such that water quality is protected

ii. Buildings and Facilities Where Pollutants are Exposed to Stormwater

1. Evaluate the use, storage, and disposal of petroleum products and other potential stormwater pollutants
2. Provide employee training to ensure proper handling of potential pollutants and that proper procedures are followed
3. Ensure that Spill Prevention Plans are in place and coordinate with the Fire Department
4. Develop waste management procedures for dumpsters and waste management equipment
5. Develop parking lot sweeping procedures and cleaning of walkways and areas around buildings to reduce runoff of pollutants

iii. Vehicles and Equipment

1. Establish procedures for the storage of vehicles and equipment. Vehicles with fluid leaks shall be stored indoors or containment shall be provided until repaired
2. Evaluate Fueling Areas. Fueling Areas shall be placed under cover if possible in order to minimize exposure
3. Establish procedures to ensure that vehicle wash waters are not discharged to the storm sewer system and/or surface waters (e.g. streams, ponds, wetlands)

- b. The categorized inventory and listed issues above are required to be reviewed and updated annually. The status of the inventories, any subsequent updates, O&M programs, and the maintenance activities associated with each shall be reported annually in each annual report.
- c. An Operations & Maintenance (O&M) Program shall be submitted to the EPA for the Municipal Separate Storm Sewer System (MS4) detailing the activities and procedures that will be implemented to ensure that the MS4 is maintained in a timely manner in order to prevent or reduce pollutant runoff and protect water quality. The O&M program shall be submitted as part of the Stormwater Management Program (SWMP) required in the 2003 NPDES Permit. The Program shall be submitted by July 1, 2019 and shall optimize routine inspections and the cleaning and maintenance of catch basins such that the following conditions are met:
 - i. Catch basins located near Construction Sites shall be prioritized for inspections and maintenance to determine if additional efforts are needed to address excessive sediment or debris loading
 - ii. The catch basin cleaning frequency is sufficient to support a goal of preventing catch basin sumps from becoming more than 50% full
 - iii. Catch basin sumps that are found to be more than 50% full during two consecutive inspections shall be documented, its contributing drainage area analyzed, and to the extent practicable, have the contributing sources abated. All efforts to inspect, analyze, and remedy shall be reported in the annual report
 - iv. The plan for catch basin cleaning optimization, inspection plans, or the schedule for gathering information to develop the optimization plan shall be reported in the SWMP and the first annual report due on May 1, 2018. The report shall include the metrics upon which the determination was based to conclude that the optimization plan is, in fact, optimal. A log of catch basin cleaned and inspected shall be kept by the Town
 - v. Each annual report shall include the total number of catch basins in the MS4, the number of catch basins inspected, the number cleaned, and the total volume or mass of material removed from all catch basins
- d. An Operations & Maintenance program shall be developed for sweeping and cleaning of streets and parking lots. All streets shall be swept and/or cleaned at least once per year in the Spring. The program shall also include more frequent sweeping of targeted areas on the basis of pollutant loads, inspections, catch basin cleaning results, land use, water quality limited waters, and/or TMDL waters. Each annual report shall include the miles of roads cleaned or the volume or mass of material removed
- e. An Operations & Maintenance program shall be developed for the storage of catch basin cleanings and street sweepings prior to disposal or re-use such that they do not discharge to receiving waters. The status of the O&M program and the maintenance activities associated with it shall be reported annually in each annual report.
- f. An Operations & Maintenance program shall be developed for winter road maintenance including the use and storage of salt and sand materials, the minimization of sodium chloride and other chloride containing material use, the evaluation of alternative de-icing materials, and snow storage and disposal activities such that snow is not deposited into waters of the United States. The status of the O&M program and the maintenance activities associated with it shall be reported annually in each annual report.
- g. An Operations & Maintenance program shall be developed for inspection and maintenance frequencies and procedures for all stormwater treatment structures such as water quality swales, retention/detention basins, infiltration structures, and proprietary treatment devices.

All treatment structures, except catch basins, shall be inspected at least once annually. The status of the O&M program and the maintenance activities associated with it shall be reported annually in each annual report.

- h. A written record of all required activities including, but not limited to, maintenance activities, inspections, and training required under this Minimum Control Measure shall be kept for a minimum of five (5) years, be made available to the public, and be posted on the Town's website.
- i. A written Stormwater Pollution Prevention Plan (SWPPP) shall be created for each of the following Town owned or operated facilities by July 1, 2019:
 - i. Maintenance Garages
 - ii. Public Works Yards
 - iii. Transfer Stations
 - iv. Waste Handling Facilities where pollutants are exposed to stormwater
- j. The SWPPP shall include the following elements:
 - i. Pollution Prevention Team composed of staff identified by name and position title
 - ii. Description of the facility and identification of potential pollutant sources located on a map of the facility with a description of the activities that occur at the facility. The map shall include the location of all outfalls, receiving waters, floor drains, and all structural controls (BMPs)
 - iii. The BMPs shall be selected, designed, installed, and implemented to prevent or reduce the discharge of pollutants that originate from the facility. Pollutants that do not originate from the facility shall also be controlled and addressed to the reasonable extent possible. Discharges to water quality limited waters shall be retro-fitted or modified with BMPs to specifically target the pollutant(s) that limit water quality to ensure that the discharge does not contribute to and/or cause a violation of a water quality standard
 - iv. Materials and activities at the facility shall be located to minimize or prevent exposure to stormwater by enclosure or storm-resistant coverings when not in use [Minimize or Prevent Exposure]
 - v. All exposed areas that are potential sources of pollution shall be kept clean by sweeping, litter removal, and/or removal of leaking containers and vehicles [Good Housekeeping]
 - vi. All equipment and systems shall be regularly inspected, tested, maintained and repaired to avoid situations that may result in leaks, spills, and other releases of pollutants to receiving waters. Inspections shall be conducted at least once per quarter [Preventative Maintenance]
 - vii. A Spill Prevention and Response plan that includes the following provisions:
 - 1. Preventative measures such as barriers, secondary containment systems, and procedures for materials storage and handling
 - 2. Response procedures that include notification of supervisory personnel, emergency agencies, and regulatory agencies. Contact information for individuals and agencies shall be stated in the procedures and at locations that are readily accessible and available. Should a leak, spill, or other release containing a hazardous substance or oil in an amount equal to or in excess of a reportable quantity established under 40 CFR 110, 117, and/or 302 occur, the National Response Center (NRC) shall be notified at 800-424-8802 as soon as knowledge of the discharge is realized. State and local agencies dealing with hazardous spills including environmental, public health and owners of public drinking water supplies shall also be identified and have their contact information provided in the procedures

3. Procedures for stopping, containing, and cleaning up leaks, spills, and other releases. Measures for cleaning up hazardous material spills or leaks shall be consistent with applicable Resource Conservation and Recovery Act (RCRA) regulations
 4. Training of personnel in the proper preventative measures, notification procedures, and clean up procedures. The appropriate spill response equipment shall be provided and made available. If possible, one of these staff members should be a member of the Pollution Prevention Team
- viii. Erosion and Sediment Control structural and non-structural measures shall be used to stabilize areas and minimize or eliminate onsite erosion and sedimentation
 - ix. Stormwater Management of runoff in order to prevent or reduce the discharge of pollutants by diverting runoff from receiving waters, capturing or containing runoff, re-using runoff, infiltrating runoff, or treating runoff
 - x. Storage of Salt or chloride containing products shall be enclosed or covered by July 1, 2019
 - xi. Training of personnel on the SWPPP for each facility, including all members of the Pollution Prevention Team shall be conducted covering all components identified in the SWPPP. Each training shall be documented and shall include the training date, title, and training duration; the list of municipal attendees; and subjects covered during the training
 - xii. Site inspections of all areas exposed to stormwater shall be conducted at least once per quarter
 - xiii. All Control Measures, structural and non-structural BMPs, and related equipment shall be maintained in effective operating condition and the written maintenance procedures, including the regular schedule thereof, shall be kept onsite at all times. A back-up plan or procedure shall be developed for each control measure when it goes off-line for maintenance and emergency reasons. Should a control measure need repair or be found to not be operating effectively, the control measure shall be repaired or replaced before the next anticipated storm event if possible or as soon as practicable following the storm event. While the control measure is off-line, the back-up plan or procedure shall be placed in operation
 - xiv. Site inspections of all areas exposed to stormwater and all control measures shall be conducted at least once per quarter when the facility is in operation. At least one inspection shall be conducted when a stormwater discharge is occurring. The inspections shall be documented and shall include the following information:
 1. The inspection date and time
 2. The name of the inspector
 3. Weather information and a description of any discharge occurring at the time of inspection
 4. Identification of any previously unidentified discharges from the site
 5. Any control measures needing maintenance or repair
 6. Any failed control measures that need replacement
 7. Any SWPPP changes required as a result of the inspection
 - xv. A written record of all required activities in the SWPPP including, but not limited to, maintenance, inspections, and training shall be kept for a minimum of five (5) years and shall be made available to the public by posting on the Town's website, and shall be included in the annual report due each May 1st

C. The 2016 NPDES Regulations require an annual Program Evaluation by the permittee and to document the self-evaluation in the annual report. The annual evaluation shall also be documented as part of the SWMP. Each BMP shall be evaluated for appropriateness and effectiveness in achieving the objectives of each control measure and the defined measurable goals. If a BMP is found to be ineffective, the BMP may be changed after the basis for the change has been

documented in the SWMP that includes, at a minimum, an analysis of why the BMP is ineffective or infeasible, the expectations on the effectiveness of the replacement BMP, and an analysis of why the replacement BMP is expected to achieve the defined goals of the BMP to be replaced. Changes that add BMPs or control measures made be made at any time. EPA or MassDEP may require the Town to add, modify, repair, replace, or change any BMP or other measure described in the annual reports it determines to be necessary. All BMP modifications along with a brief explanation of each modification shall be documented in the annual report.

- D. All Records required by the 2016 NPDES Permit, including back-up documentation, shall be kept for a minimum of five (5) years. All records required by the 2016 NPDES Permit, excluding back-up documentation, shall be posted on the Town's website. All record information shall be made available to the public upon request.
- E. Outfall Monitoring and Reporting is required by the 2016 NPDES Regulations in connection with the IDDE Minimum Control Measure (II B 3 in this Update to the BOS) and the assessment of SWMP effectiveness (II C in this Update to the BOS).
- F. Annual Reports covering the period from July 1st to June 30th are required to be submitted by September 28th of each year. The annual reports shall contain the following information:
 - 1. A self-assessment review of compliance with the permit terms and conditions
 - 2. An assessment of the appropriateness of the selected BMPs
 - 3. The status of any plans or activities required to meet Water Quality Based Effluent Limitations and Discharges to Certain Impaired Waters requirements including:
 - a. Identification of all discharges determined to be causing or contributing to an exceedance of water quality standards and a description of the permittee's response to eliminate or reduce such exceedances
 - b. Identification of specific BMPs used to address the pollutant identified as the cause of an impairment in discharges subject to a TMDL and assessment of the BMP's effectiveness at controlling the pollutant
 - c. Identification and description of specific BMPs used to address the pollutants identified as the cause of an impairment in discharges to a water quality limited water
 - 4. An assessment of the progress towards achieving the measurable goals and objectives of each Control Measure including:
 - a. An evaluation of the Public Education program including a description of the targeted messages for each audience, method of distribution and dates of distribution, methods used evaluate the program, and any changes to the program
 - b. Description of the activities used to promote Public Participation including documentation of compliance with State public notice regulations
 - c. Description of the activities related to implementation of the IDDE Program including status of the map, status and results of the illicit discharge potential ranking and assessment, identification of problem catchments, status of all protocols concerning program responsibilities and systematic procedures in the IDDE program, number and identification of catchments evaluated, number and identification of outfalls screened, number of illicit discharges located, number of illicit discharges removed, gallons of sanitary sewage removed from stormwater, identification of tracking indicators and measures of progress based on those indicators, and employee training
 - d. Evaluation of the Construction Site Stormwater Runoff Control measure including the number of project plans reviewed, number of inspections, and number of enforcement actions
 - e. Evaluation of the Post Construction Stormwater Management measure for new development and redevelopment including status of bylaw development, review

and status of the street design assessment, assessments to barriers to green infrastructure, and retro-fit inventory status

- f. Status of all O&M Programs required
- g. Status of all SWPPP's required

- 5. All Outfall screening and monitoring data collected or received during the five year permit term
- 6. A description of all activities for the next year permit reporting cycle
- 7. A description of any changes in identified BMPs or measurable goals
- 8. A description of activities undertaken by any entity contracted for achieving any measurable goal or implementing any control measure