# MASSACHUSETTS MOSQUITO CONTROL

ANNUAL OPERATIONS REPORT

Year Report Covers: 2017 Date of Report: 00/10/2018

Project/District Name: Norfolk County Mosquito Control District

Address: 144 Production Road

City/Town: Walpole

Zip: 02081

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Report prepared by: David Lawson

NPDES permit no. MAG87A021

If you have a mission statement, please include it here: "The Norfolk County Mosquito Control District Commission represents the interests of the member communities and their residents by providing oversight of District activities. The Commissioners each live or work within a community serviced by the District, were nominated by municipal authorities, and were evaluated and appointed to their posts by the State Reclamation and Mosquito Control Board. The Commission strives to ensure that the member communities receive services consistent with applicable laws and justified by tenets of public health, vector control, environmental safety and fiscal responsibility. The Commission invites input and questions from community officials and residents. The District's website announces the Commission's monthly meetings and planned agendas, and hosts minutes from past meetings."

### ORGANIZATION SETUP:

#### Commissioner names:

<u>Robin L. Chapell</u> <u>Maureen P. MacEachern</u> <u>Linda R. Shea</u> <u>Norman P. Jacques</u> <u>Richard J. Pollack, PhD</u>

Superintendent/Director name: David Lawson

Superintendent/Director contact phone number: (781) 762-3681 Asst. Superintendent/Director name: Caroline Haviand - Field Operations Manager

District/Project website: http://www.norfolkcountymosquito.org Twitter handle: @ Facebook page: http://www.facebook.com/Norfolk-County-Mosquito-Control-District-152138671525303/?fref=ts

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## Staffing levels for the year of this report:

Full time: 12 Part time: Seasonal: 1 Other: (please describe)

#### Of the above, how many are:

(Please check off all that apply, and list employee name(s) next to each category)

Administrative Liz Donnell, David Lawson, Caroline Haviland

Biologist Kaitlyn O'Donnell, Caroline Haviland

Educator Kaitlyn O'Donnell, David Lawson

Entomologist Kaitlyn O'Donnell

Facilities David Lawson, Caroline Haviland

Information technology Nate Boonisar

Laboratory Kaitlyn O'Donnell

Operations Caroline Haviland, David Lawson, Brian Moore, William Haviland, Robert

O'Halloran, John Tuana, Anthony Caso, Eric Tarala, Greg Gangitano

Public relations Kaitlyn O'Donnell, Caroline Haviland, David Lawson

Wetland scientist Caroline Haviland

Other (please describe) GIS - Nate Boonisar

For the year of this report, the following were maintained (enter number in the column to the left):

A Modified wetland equipment (list type) Linkbelt 1600 quantum series excavator, modified (extended tracks) Kobelco SK60 excavator, non wetland - John deere 880 bulldozer, Bombadier Muskeg

Larval control equipment (list type) Mid-Atlantic Equipment high pressure larvicide unit, A-1 Mist sprayer

8 ULV sprayers (list type) 7 Clarke Dura Promist, 1 Cougar

19 Vehicles

Other (please be specific):

#### Comments: \_\_\_\_\_

How many cities and towns are in your service area?\* 25

Alphabetical list: Avon, Bellingham, Braintree, Canton, Dedham, Dover, Foxborough, Franklin, Holbrook, Medfield, Medway, Millis, Milton, Needham, Norfolk, Norwood, Plainville, Quincy, Randolph, Sharon, Stoughton, Walpole, Westwood, Weymouth, Wrentham

Map of Service area www.norfolkcountymosquito.org/service-request/

Were there any changes to your service area this year? No Cities/towns added: Cities/towns removed:

#### \*Please attach a map of your service area (or a website link to that map).

#### INTEGRATED PEST MANAGEMENT (IPM):

Check off all services that your district/project currently provides to member cities and towns as part of an IPM program (details will be provided in the sections below):

$\boxtimes$	Adult mosquito control
$\ge$	Adult mosquito surveillance
$\ge$	Ditch maintenance
$\ge$	Education, Outreach & Public education
$\ge$	Larval mosquito control
$\boxtimes$	Larval mosquito surveillance
$\boxtimes$	Open Marsh Water Management
$\boxtimes$	Research
$\square$	Source reduction (tire removals)
$\square$	Other (please list):

Comments: \_\_\_\_\_

#### LARVAL MOSQUITO CONTROL:

If you have a larval mosquito control program, please fill out the section below, else skip ahead to the next section.

Describe the purpose of this program: Targeted preemptive control measures are the most cost effective, efficient and environmentally friendly way to reduce mosquito populations. NCMCD applies biorational insecticides to shallow water to control mosquitoes in their most vulnerable aquatic stages in an attempt to prevent the emergence of adult mosquitoes. A GIS database of mosquito larval development sites are checked and treated as necessary by means of hand and/or aerial application. Spring and summer flooding following snow melt and/or heavy rainfall creates a potential each year for significant mosquito larval development in various wetlands across Norfolk County. The predominate species which develop in the spring are Ochlerotatus abserratus, Ochlerotatus excrucians and Ochlerotatus canadensis. In the summer the predominate species following river flooding are Ochlerotatus trivittatus, Aedes cinereus, Aedes vexans, Psorophora ferox and Ochlerotatus canadensis. All of these mosquito species are strong human biters and can create significant nuisance level populations during the late spring and summer months. During certain years some of the summer mosquito species, such as Aedes vexans, may be involved in the transmission of Eastern Equine Encephalitis (EEE) from birds to humans. In an effort to proactively control these aggressive human biting species, and in an environmentally responsible manner, the Norfolk County Mosquito Control District conducts aerial larval control operations using products with the active ingredient Bacillus thuringiensis israelensis (Bti). In small wetlands and in larval development sites proximate to homes, where aircraft applications are not suitable, hand applications using the same products at the same rates are utlilized.

NCMCD makes applications of an insecticide to catch basins, storm water structures, etc. to control primarily Culex mosquitoes in their aquatic stages. Culex species have been identified as likely vectors of WNv.

NCMCD has begun research and surveillance in consideration of conducting fall aerial applications to control Coquilletidia perturbans in the unique wetland habitats that they overwinter in.

What months is this program active? April - September

Describe the types of areas where you use this program: Ground larvicide treatments are typically made to smaller natural and manmade wetlands and depressions. The typical wetlands treated during the spring aerial larvicide are described as large (greater than five acres) Wooded Swamp Deciduous/Coniferous/Mixed, Shrub Swamp, Shallow Marsh/Meadow/Fen wetlands. Summer aerial applications applications are more typically conducted over river floodplain areas especially within wetlands adjacent to the Neponset and Charles Rivers. Maps of aerially targeted wetlands are available on the District's website.

Rain Basin treatments typically occur in high density population areas around centers of towns and heavy residential/commercial areas.

Do you use: Ground application (hand, portable and/or backpack, etc.) Aerial applications Other (please list): Comments: \_\_\_\_\_

Product Name	EPA #	Application Rate(s)	Application Method	Targeted life stage	Habitat Type	Total finished product applied
VectoBac GR	73049-486	2.5-10 Lbs/acre	aerial	Larvae	Catch basins Containers Wetland Other (please list):	44,476 lbs
VectoBac G	73049-10	2.5-10 Lbs/acre	hand/back pack blower	Larvae	☐ Catch basins ☑ Containers ☑ Wetland ☐ Other (please list):	2,967.98 lbs
VectoBac 12AS	73049-38	.25-2 pints/acre	Pressure sprayer	Larvae	Catch basins Containers Wetland Other (please list):	140.4 pints
VectoLex WSP	73049-20	1 pouch/50 sq. ft.	hand	Larvae	Catch basins Containers Wetland Other (please list):	4,563
Fourstar Briquet	83362-3	1 Briquet/100 sq. ft.	hand	Larvae	Catch basins Containers Wetland Other (please list):	11,103
Altosid XR	2724-421	1 Briquet/100 sq. ft.	hand	Larvae	Catch basins Containers Wetland Other (please list): 21 swimming pools	21
Altosid 30 day briquet	2724-375	1 briquet/100 sq/ ft.	hand	Larvae	Catch basins Containers Wetland Other (please list): 6 swimming pools	1,881

List all products that you use for larval mosquito control in the table below (leave blank if not applicable):

Product Name	EPA #	Application	Application	Targeted life	Habitat Type	Total finished
		Rate(s)	Method	stage		product applied
Altosid WSP	2724-448	1 pouch / 135 sq. ft.	hand	Larvae	Catch basins Containers Wetland Other (please list):	10,107
Fourstar 45 day briquet	83362-3	1 briquet / 100 sq. ft.	hand	Larvae	Catch basins Containers Wetland Other (please list):	200
Fourstar Bti CRG	85685-4	7.5-20 lbs / acre	hand/Backpack blower	Larvae	Catch basins Containers Wetland Other (please list):	22lbs
CocoBear Oil	8329-93	10 oz/1000 sq. ft.	hand pump sprayer	Larvae/pupae	☐ Catch basins ☐ Containers ⊠ Wetland ⊠ Other (please list):	1,062 oz
				Choose one	Catch basins Containers Wetland Other (please list):	
				Choose one	Catch basins Containers Wetland Other (please list):	
				Choose one	Catch basins Containers Wetland Other (please list):	

List all products that you use for larval mosquito control in the table below (leave blank if not applicable):

What is your trigger for larviciding operations? (check all that apply)

- Best professional judgment
- Historical records
- 🔀 Larval dip counts please list trigger for application:

Other (please describe):

Comments:

# Please attach a map of your service area (or a website link to that map). www.norfolkcountymosquito.org/service-request/

#### ADULT MOSQUITO CONTROL:

If you have a larval mosquito control program, please fill out the section below, else skip ahead to the next section.

Describe the purpose of this program: When larviciding is not a viable option (example: Coquillettidia perturbans) and/or when adult mosquito populations reach levels which are either bothersome to residents and/or a public health concern is realized, targeted adulticiding applications are used. NCMCD makes decisions to use adulticides based on evaluations of the risks of EEE or WNv transmission to humans in collaboration with MDPH or based on evaluations of the nuisance level that residents report to NCMCD. NCMCD also bases decisions to adulticide on mosquito surveillance (trap counts), field crew observations and after careful analysis of predicted local weather conditions.

What is the time frame for this program? June through September

Describe the types of areas where you use this program: ULV applications can be conducted anywhere the trucks can access, though mostly on paved streets in residential neighborhoods. Barrier applications are conducted on municipal properties that the public utilizes and where the public may be at risk, such as schools, public parks, and athletic fields.

Do you use: Aerial applications Portable applications Truck applications Other (please list): Comments:

For each product used, please list the name, EPA #, and application rate(s):

Product Name	EPA #	Application	Application	Total finished
		Rate(s)	Method	product applied
Zenivex E4	2724-807	1.0 oz/acre	Truck mounted ULV	1,003.82 gal
Mavrik	2724-478	0.1oz/gal/10	Truck mounted	270 oz
Perimeter		00 sq. ft.	sprayer	

Please describe the maximum amounts or frequency used in a particular time frame such as season and areas

ULV is potentially conducted in each town once per week. Possibly more if a disease threat warrants further applications. Barrier applications are conducted based on requests from municipal officials and our own assessments and surveillance. Barrier applications are effective for a couple weeks, and so not repeated for at least 2 weeks.

What is your trigger for adulticiding operations? (check all that apply)

Arbovirus data

Best professional judgment

Complaint calls (Describe trigger for application: GEIR - more than one call per square mile)

Landing rates (Describe trigger for application GEIR - more than one bite per minute)

Light trap data (Describe trigger for application GEIR - more than 5 human biting

mosquitoes per trap per night )

Comments: \_\_\_\_\_

# Please attach a map of your service area (or a website link to that map). www.norfolkcountymosquito.org/service-request/

#### **SOURCE REDUCTION (Tire Removals)**

If you practice source reduction methods, such as tire removal, please fill out the section below, else skip ahead to the next section.

Please describe your program: NCMCD advises residents/Boards of Health in person or via phone or internet to empty any containers that may hold water on their property. When performing site visits, personnel will overturn containers that hold water with mosquito larvae present. In 2012 NCMCD initiated a tire removal program which continued into 2017. The District picks up tires from residents who request this service. Tires must be off the rim and the District takes no more than 10 tires per resident per year. The District also removes dumped tires from the enviroment. Locations are reported as employees find tires during routine field work. 819 tires were removed and recylced in 2017.

What time frame during the year is this method employed? year round

#### Comments: \_\_\_\_\_

#### WATER MANAGEMENT/DITCH MAINTENANCE

If you have a water management or ditch maintenance program, please fill out the section below, else skip ahead to the next section.

Please check all that apply:
Inland/freshwater
Saltmarsh
Please describe your program:

Estimate of cumulative length of culverts, ditches swales, etc. maintained (ft)	
554 culverts cleaned	
74,910 feet	
5,768 feet	
780 feet	

#### For inland/freshwater water management, check off all that apply.

Comments: \_\_\_\_\_

#### For saltmarsh ditch maintenance, check off all that apply:

Maintenance Type	Estimate of cumulative length of ditches maintained (ft)
Hand cleaning	980
Mechanized cleaning	1,010
Other (please list):	

Comments: \_\_\_\_\_

What time frame during the year is this method employed? all year, but primarily fall-winter.

Comments:

Please attach a map of ditch maintenance areas (or a website link to that map).

#### **OPEN MARSH WATER MANAGEMENT**

If you have an Open Marsh Water Management program, please fill out the section below, else skip ahead to the next section.

Describe the purpose of this program: OMWM is currently not active at NCMCD

What months is this program active?

Please give an estimate of total square feet or acreage:

**Comments:** The NCMCD has conducted OMWM in the past, but has stopped performing OMWM due to regulatory requirements that make it overly burdensome to the District. The Districts OMWM permit from the ACOE expired in January 2016, and was not renewed. The District conducted maintenance this year on a previous OMWM project completed in 2001.

#### Please attach a map of OMWM areas (or a website link to that map).

#### **MONITORING (Measures of Efficacy)**

#### Describe monitoring efforts for each of the following:

Aerial Larvicide – wetlands: In the weeks prior to a spring aerial application, wetlands are dipped in all aerial regions and this data is compiled in the GIS map data. Post application dipping is conducted. During the aerial application in 2016, aerial Bti application efficacy was compared in treated and untreated experimental wetlands before and after application.

Ground ULV Adulticide:NCMCD did not monitor ULV efficacy in 2017Larvicide – catch basins:NCMCD did not monitor efficacy in catch basins in 2017Larvicide-hand/small areaThe Director randomly inspects ground larvicide sites in<br/>the spring for employee reporting follow up and concurrently inspects sites for efficacy.Open Marsh Water Management:NASource Poduction:The Eicld Operations Manager conducts follow up site

Source Reduction: The Field Operations Manager conducts follow-up site visits to water management project sites to make sure the work is fucntioning as designed.

Other (please list):

Provide or list standard steps, criterion, or protocols regarding the documentation of efficacy (pre and post data), and resistance testing (if any): **No resistance testing was performed in 2017.** 

Check the boxes below, indicating if your program has performed any of the following:

Research Project	Details
Bottle assays	
Efficacy testing	
Other:	
Other:	

#### ADULT MOSQUITO SURVEILLANCE

If you have an adult mosquito surveillance program, please fill out the section below, else skip ahead to the next section.

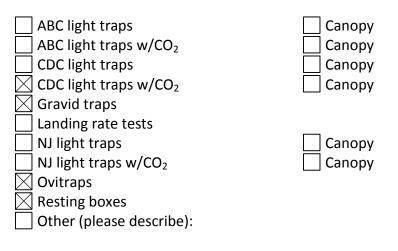
Describe the purpose of this program: CDC Light Traps: CDC Light Traps with CO2 are used to determine the presence of adult mosquitoes and their density. CDC Light Traps with CO2 are also used to monitor for EEE and West Nile Virus. Collections of mosquitoes (pools) are submited weekly to the Massachusetts Arbovirus Surveillance Laboratory (MDPH) and tested for the presence of West Nile Virus and EEE in local mosquito populations.

Gravid Traps: These traps are used by NCMCD to collect primarily Culex pipiens and restuans mosquitoes for submission to the Massachusetts Arbovirus Surveillance Laboratory (MDPH) for West Nile Virus analysis. The gravid mosquitoes attracted to these traps are important for virus surveillance because they have previously fed on a host. Bird biting mosquito species are usually the first to pick up West Nile and Eastern Equine viruses each season.

Resting boxes are used to supplement capture of C. melanura for the detection of EEE.

What months is this program active? June - October

Check off all trap types currently in use by your program:



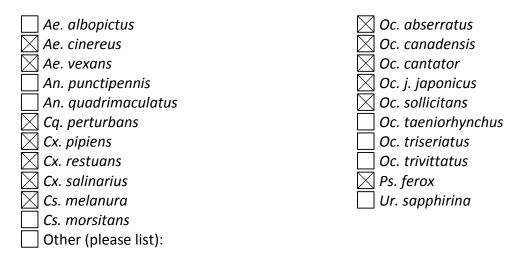
Do you maintain long-term trap sites in any of your areas? Yes

If yes, please describe how you chose these long-term sites:

CDC Light Traps: CDC Light traps with CO2 are placed for maximum collection of species of interest both for monitoring of human biting populations as well as for collection of species important in the transmission of EEE and WNv.

Gravid Traps: Gravid Traps are placed at locations for maximum collection of Culex pipiens and restuans. Traps are located in all 25 communities usually in the highest urbanized areas to maximize collections.

Please check off the species of concern in your service area:



Do you participate in the MDPH Arboviral Surveillance program? Yes How many pools do you submit weekly on average? 25

Number of traps in your service area placed by MDPH: 2

Were these long-term trap sites or supplemental trapping sites? long-term

Which arboviruses were found in your area during the previous mosquito season? Enter the number of pools/cases below:

Arbovirus	Positive Mosquito Pools	Equine Cases	Human Cases
Eastern Equine Encephalitis (EEE)	0	0	0
🛛 West Nile Virus (WNV)	9	0	0
Other (please list):	0	0	0

#### Comments:

For each arbovirus listed below, please list the risk levels in your project area at both the start and end of the season (if more than one, please list all):

Arbovirus	Start of Season	End of Season
EEE	low	low
WNV	low	low - moderate

#### Comments: \_\_\_\_\_

#### **EDUCATION, OUTREACH & PUBLIC RELATIONS**

*If you have an education/outreach program, please fill out the section below, else skip ahead to the next section.* 

Describe the purpose of this program: NCMCD maintains a very informative website which is updated frequently during the season. It contains fact sheets concerning West Nile virus and EEE virus. It also contains notices and news regarding treatment beginning and end dates and ways for residents to protect themselves from mosquito bites around the home. The website also contains links to the Massachusetts Department of Public Health and the Centers for Disease Control and Prevention (CDC) where residents can find up to date information on arbovirus activity in the county, the state as well as country wide. Our Entomologist participates in educational activities such as classroom activites in the schools and field education activities with summer camp programs as appropriate, as well as health fairs and farmers markets. Employees leave door hangers at residents homes after completeing larvicide requests. The hangers highlight actions a resident can do to reduce or eliminate mosquito breeding on their property. Employees conducting ULV applications, have brochures on the ULV program to hand to residents with questions regarding the program. Employees connect to various outside organizations in an effort to better inform the public about what the District does.

What time frame during the year is this method employed? all year

Check off all education/outreach methods that were performed by your program this year:

- Development/distribution of brochures, handouts, etc.
  - Door-to-door canvassing (door hangers, speaking to property owners, etc.)
- Kacebook page, Twitter, or other social media
  - Mailings (Describe target audience(s): )
- Media outreach (interviews for print or online media sources, press releases, etc.)

Presentations at meetings

School-based programs, science fairs, etc.

 $\boxtimes$  Tabling at events (local events, annual meetings, etc.)

🛛 Website

Other (please describe):

Estimate the audience reached this year using the education/outreach methods above: unknown

Comments:

List your program's top 3 education/outreach activities for this year:

- 1. <u>Website</u>
- 2. Health Fairs/Farmers Markets
- 3. <u>School talks</u>

Were you involved in any collaborations with the following partners this year? Provide details below, including a list of technical reports, white/grey papers, journal publications, trade magazine articles, etc:

Academia

Another mosquito control district/project

Another state agency (DCR, DPH, etc.)

Environmental groups

Industry Collaboration with Clarke on Cq. perturbans control study using Natular

List any training/education your staff received this year:

Please list the certifications and degrees held by your staff: Director - Master of Science (Geology), Field Operations Manager - Bachelor of Science (Biology), GIS Coordinator - Master of Science (Geological Oceanography), Entomologist - Master of Science (Entomology)

Comments: \_\_\_\_\_

#### INFORMATION TECHNOLOGY (IT)

Does your program use (check all that apply):

- 🔀 Aerial Photography
- 🔀 Databases
- Dataloggers (monitoring for temperature, etc.)

)

- GIS mapping (Describe:
- GPS equipment
- Smartphones
  - Tablets/Toughbooks
  - Other (please describe):

Describe any changes/enhancements in IT from the previous year: no major changes

Describe any difficulties your program had with IT software/equipment this year:

#### Comments: \_\_\_\_\_

#### **REVENUES & EXPENDITURES**

Please provide the amounts for your approved budgets for the current, previous, and future fiscal years. Please note if the budget for the next fiscal year is an estimate, or put "n/a" if it is not yet available.

Fiscal Year	Approved Budget
FY 2017	\$1,711,433
FY 2018	\$1,762,776

List each member municipality, along with the corresponding (cherry sheet) funding assessment dollar amount, for the current fiscal year (or provide a web link to this information): NCMCD Municipality FY 2018 Total Town Assessment

NCMCD Municipality	y FY 2018 To
AVON	\$19 <i>,</i> 363
BELLINGHAM	\$63,116
BRAINTREE	\$93,096
CANTON	\$100,465
DEDHAM	\$69 <i>,</i> 827
DOVER	\$61 <i>,</i> 731
FOXBOROUGH	\$75 <i>,</i> 826
FRANKLIN	\$117,753
HOLBROOK	\$28,441
MEDFIELD	\$62,712
MEDWAY	\$46,423
MILLIS	\$35 <i>,</i> 796
MILTON	\$84,751
NEEDHAM	\$105,328
NORFOLK	\$48,201
NORWOOD	\$71 <i>,</i> 471
PLAINVILLE	\$37,910
QUINCY	\$140,452
RANDOLPH	\$59 <i>,</i> 865
SHARON	\$86,642
STOUGHTON	\$81,848
WALPOLE	\$99 <i>,</i> 121
WESTWOOD	\$70,019
WEYMOUTH	\$110,356
WRENTHAM	\$64 <i>,</i> 997
	\$1,835,509

Comments:

#### SERVICE REQUESTS

How many service requests did you receive this season? 6,191 How many were for larviciding? 430 How many were for adulticiding? 5,761

Was this an increase or decrease over last season? Increase

#### Comments:

#### EXCLUSIONS

How many exclusion requests did you receive this season? 214

Was this an increase or decrease over last season? Increase

Do you have large areas of pesticide exclusion, such as estimated or priority habitats? Yes

If yes, please explain, and attach maps or a web link if possible. Our largest single exclusion zone is the Massachusetts Audubon Society's Moose Hill Wildlife Sanctuary in Sharon. NCMCD does not adulticide or larvicide this area. Moose Hill accounts for approximately 11% of the Town of Sharon's wetland area. The towns of Canton and Norfolk have smaller, but still significant Audubon properties that are excluded. The Trustees of Reservation excludes some significant property acreage in Millis, Medfield, Dover, and Needham. All resident exclusion zones are located via parcel maps, geocoding, or field checks, and a 300-foot buffer zone is placed around them. These areas are shown on the field crew ULV maps, along with the written address of the exclusion.

#### SPECIAL PROJECTS

Did your program perform any of the following special projects? Check all that apply.

• Inspectional services (inspections at sewage treatment facilities, review of subdivision plans, etc.)

Describe:

• Work with DPW departments or other local or state officials to address stormwater systems, clogged culverts, or other areas identified as man-made mosquito problem areas

Describe: NCMCD is in direct communication with both state DOT and local DPW departments with regard to clogged culverts, general drainage issues, and stormwater systems. NCMCD coordinates with several local DPWs annually to clean outfall areas and drainage pipes and associated drainage ditches of sand and debris that may eventually discharge into adjacent wetlands. Some town departments have assisted NCMCD by bearing the burden of disposing of sands and sediments NCMCD removes

from drainage ditches and/or streams. NCMCD has communicated with several Conservation Agents and Planning Board members in recent years relative to review, advice and discussion of stormwater issues.

- Work with groups as described above on long term solutions?
   Describe:
- Conduct or participate in any cooperative research or restoration projects?
   Describe:
- Participate in any state/regional/national workgroups or panels, or attend any meeting pertaining to the above?

Describe:

 Work on any biological control projects, such as enhancement of habitat for native predators, release of predatory fish or invertebrates, etc.?

Describe:

#### CHILDREN AND FAMILIES PROTECTION ACT (CFPA)

Is your program impacted by the CFPA? Yes

If yes, please explain: Throughout the Districts service area, NCMCD has approximately 225 schools and 250+ day cares that must comply with this law. Each school/day care has been located either through parcel maps, when available, or through geocoding, combined with aerial photography. These properties are excluded from routine applications. The exclusion zones are clearly marked on the ULV route maps that are posted on the districts website in an effort to keep the public informed of the exclusionary status of these areas.

If you have data on compliance rates with the CFPA within your program area, please list here:

Describe any difficulties you have had with the implementation of your program due to the CFPA, please elaborate here:

Comments:

#### NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) PERMIT PROGRAM

Did your program report any adverse incidents during this reporting period? No

If yes, please list any corrective actions here: \_\_\_\_\_

## **GENERAL COMMENTS**

Please add any comments here for topics not covered elsewhere in this report: \_\_\_\_\_