

# MS4 Annual Report/Interim Progress Certification 2025

version 1.0

(Submission #: HQA-D0Y9-T2EX6, version 1)

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## Details

**Alternate Identifier** NYR20A237

**Submission ID** HQA-D0Y9-T2EX6

## Form Input

### MS4 Operator Information

**Municipality Name or Legal Entity Name**

Town of Newburgh

**Permit ID #:**

NYR20A237

**MS4 Operator Type**

Traditional land use control

**Traditional Land Use Control**

Town

**Traditional Land Use Control**

Traditional land use control MS4 Operator requirements are found in Part VI of the MS4 General Permit.

**Legal Municipal/Entity Mailing address**

1496 Route 300  
Newburgh, NY 12550  
Orange

**Ranking Official**

Official Title	First and Last Name	Phone	Email
Town Supervisor	Gil Piaquadio	845-564-7824	supervisor@townofnewburgh.org

**Report Preparer**

Report Preparer Title	First and Last Name	Phone	Email
Other: Municipal Consultant	Brett Sherman	845-567-3100	bsherman@mhepc.com
Other: Municipal Consultant	David Fritts	570-296-2765	dfritts@mhepc.com

**Stormwater Program Coordinator**

Coordinator Title	First and Last Name	Phone	Email
Stormwater Program Coordinator	Gil Piaquadio	845-564-7824	supervisor@townofnewburgh.org

## Part IV

Was the information in this section completed as part of a coalition/group?

No

## MS4 General Permit Resources

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Use the following webpages for more information on the permit and fact sheet:

[MS4 Permit Webpage](#)

[MS4 Toolbox](#)

## SWMP Plan

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**Annually: Have the alternative implementation agreements in the SWMP Plan been updated? (Part IV.A.1.e.)**

Yes

**Annually: Has the SWMP been updated? (Part IV.B.3.)**

Yes

## Mapping

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**Annually: Has the comprehensive system mapping been updated? (Part IV.D.)**

Yes

**What tools are used to satisfy the comprehensive system mapping requirements? (e.g. paper maps, GIS, web mappers, etc.)**

GIS

**Within three (3) years of the EDC: Has Phase I of the comprehensive mapping been completed? (Part IV.D.2.a.)**

No

**Please clarify the reason for selecting "No" for this item.**

Municipality is working towards meeting deadline.

**Within five (5) years of the EDC: Has Phase II of the comprehensive mapping been completed? (Part IV.D.2.b.)**

No

**Please clarify the reason for selecting "No" for this item.**

Municipality is working towards meeting deadline.

## Legal Authority

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**Within three (3) years of the EDC: For newly designated MS4 Operators, has adequate legal authority been developed and implemented? (Part IV.E.)**

No

**Please clarify the reason for selecting "No" or "N/A" for this item.**

Town of Newburgh is not a new MS4.

**Please enter any comments related to the questions in this section below:**

N/A

## Part V

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**In Year 5: Has the SWMP Plan been evaluated? (Part V.C.)**

No

**Please clarify the reason for selecting "No" or "N/A" for this item.**

Municipality is working towards meeting deadline.

## Part VI

**Which MCMs in this Part were completed as a coalition/group, if any?**

NONE PROVIDED

### Minimum Control Measure 1

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**Within three (3) years of the EDC: Have the focus areas been identified? (Part VI.A.1.a.)**

No

**Please clarify the reason for selecting "No" or "N/A" for this item.**

Municipality is working towards meeting deadline.

**Within three (3) years of the EDC: Have the target audience(s) and associated pollutant generating activities been identified? (Part VI.A.1.b.)**

No

**Please clarify the reason for selecting "No" or "N/A" for this item.**

Municipality is working towards meeting deadline.

**Within three (3) years of the EDC: Have the education and outreach topics been identified and how the education and outreach topics will reduce the potential for pollutants explained? (Part VI.A.1.c.)**

No

**Please clarify the reason for selecting "No" or "N/A" for this item.**

Municipality is working towards meeting deadline.

**In Year 5: Has the method(s) used for distribution of educational messages been identified? (Part VI.A.2.a.)**

No

**Please clarify the reason for selecting "No" or "N/A" for this item.**

Municipality is working towards meeting deadline.

**In Year 5: Has one educational message been delivered to each target audience(s) for each focus area based on the education and outreach topic(s)? (Part VI.A.2.b.)**

No

**Please clarify the reason for selecting "No" or "N/A" for this item.**

Municipality is working towards meeting deadline.

**In Year 4 and Year 5: Have target audiences, focus areas, and/or education and outreach topics been updated? (Part VI.A.2.c.)**

No

**Please clarify the reason for selecting "No" or "N/A" for this item.**

Municipality is working towards meeting deadline.

**Please enter any comments related to the questions in this section below:**

N/A

### Minimum Control Measure 2

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**Annually: Has an opportunity for public involvement/participation in the development and implementation of the SWMP been provided? (Part VI.B.1.a.)**

Yes

**What was the opportunity for public involvement/participation in the SWMP?**

Reporting concerns about activities or behaviors observed

**Annually: Has the public been informed about the opportunity for their involvement in the development and implementation of the SWMP and how they can get involved? (Part VI.B.1.b.)**

Yes

**What is the method(s) used for distribution to inform the public of the opportunity for involvement?**

Electronic materials (e.g., websites, email listservs)

**Annually: Has an opportunity to review and comment on the publicly available SWMP Plan been provided? (Part VI.B.2.a.)**

Yes

**Annually: Has an opportunity to review and comment on the draft annual report been provided? (Part VI.B.2.b.i.)**

Yes

**What opportunity for review and comment on the draft annual report has been provided?**

Posting of draft Annual Report on a public website

**Annually: Have the comments received on the SWMP Plan been summarized? (Part VI.B.2.c.i.)**

No

**Please clarify the reason for selecting "No" or "N/A" for this item.**

No comments were received.

**Annually: Have the comments received on the draft annual report been summarized? (Part VI.B.2.c.i.)**

No

**Please clarify the reason for selecting "No" or "N/A" for this item.**

No comments received.

**Please enter any comments related to the questions in this section below:**

N/A

### **Minimum Control Measure 3**

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**Within three (3) years of the EDC: Has an inventory of monitoring locations been developed? (Part VI.C.1.c.i.)**

No

**Please clarify the reason for selecting "No" or "N/A" for this item.**

Municipality is working towards meeting deadline.

**In Year 4 and Year 5: Has the monitoring location inventory been updated? (Part VI.C.1.c.ii.)**

No

**Please clarify the reason for selecting "No" or "N/A" for this item.**

Municipality is working towards meeting deadline.

**Within three (3) years of the EDC: Have monitoring locations been prioritized? (Part VI.C.1.d.i.)**

No

**Please clarify the reason for selecting "No" or "N/A" for this item.**

Municipality is working towards meeting deadline.

**In Year 4 and Year 5: Has the monitoring location prioritization been updated? (Part VI.C.1.d.iii.)**

No

**Please clarify the reason for selecting "No" or "N/A" for this item.**

Municipality is working towards meeting deadline.

**Within two (2) years of the EDC: Has a monitoring locations inspection and sampling program been developed and implemented? (Part VI.C.1.e.)**

No

**Please clarify the reason for selecting "No" or "N/A" for this item.**

Municipality is working towards meeting deadline.

**In Year 5: Have all the monitoring locations been inspected? (Part VI.C.1.e.i.a))**

No

**Please clarify the reason for selecting "No" or "N/A" for this item.**

Municipality is working towards meeting deadline.

**How many monitoring locations have been inspected?**

0

**In Year 5: Has training on the MS4 Operator's monitoring locations inspection and sampling procedures been provided? (Part VI.C.1.e.ii.)**

No

**Please clarify the reason for selecting "No" or "N/A" for this item.**

Municipality is working towards meeting deadline.

**In Year 3, Year 4, and Year 5: Have the names, titles, and contact information for the individuals who have received monitoring locations inspection and sampling training been updated? (Part VI.C.1.e.iii.)**

No

**Please clarify the reason for selecting "No" or "N/A" for this item.**

Municipality is working towards meeting deadline.

**In Year 3, Year 4, and Year 5: Have the monitoring locations inspection and sampling procedures been updated? (Part VI.C.1.e.iv.)**

No

**Please clarify the reason for selecting "No" or "N/A" for this item.**

Municipality is working towards meeting deadline.

**Within two (2) years of the EDC: Has an illicit discharge track down program been developed and implemented? (Part VI.C.2.)**

No

**Please clarify the reason for selecting "No" or "N/A" for this item.**

Municipality is working towards meeting deadline.

**In Year 5: Has training on the MS4 Operator's illicit discharge track down procedures prior to conducting illicit discharge track down been provided? (Part VI.C.2.b.)**

No

**Please clarify the reason for selecting "No" or "N/A" for this item.**

Municipality is working towards meeting deadline.

**In Year 3, Year 4, and Year 5: Have the names, titles, and contact information for the individuals who have received illicit discharge track down procedures training been updated? (Part VI.C.2.c.)**

No

**Please clarify the reason for selecting "No" or "N/A" for this item.**

Municipality is working towards meeting deadline.

**In Year 3, Year 4, and Year 5: Have the illicit discharge track down procedures been reviewed and updated? (Part VI.C.2.d.)**

No

**Please clarify the reason for selecting "No" or "N/A" for this item.**

Municipality is working towards meeting deadline.

**Within two (2) years of the EDC: Has an illicit discharge elimination program been developed and implemented? (Part VI.C.3.)**

No

**Please clarify the reason for selecting "No" or "N/A" for this item.**

Municipality is working towards meeting deadline.

**In Year 5: Has training on the MS4 Operator's illicit discharge elimination procedures prior to conducting illicit discharge elimination been provided? (Part VI.C.3.b.)**

No

**Please clarify the reason for selecting "No" or "N/A" for this item.**

Municipality is working towards meeting deadline.

**In Year 3, Year 4, and Year 5: Have the names, titles, and contact information for the individuals who have received illicit discharge elimination procedures training been updated? (Part VI.C.3.c.)**

No

**Please clarify the reason for selecting "No" or "N/A" for this item.**

Municipality is working towards meeting deadline.

**In Year 3, Year 4, and Year 5: Have the illicit discharge elimination procedures been reviewed and updated? (Part VI.C.3.d.)**

No

**Please clarify the reason for selecting "No" or "N/A" for this item.**

Municipality is working towards meeting deadline.

**Please enter any comments related to the questions in this section below:**

N/A

#### **Minimum Control Measure 4**

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**Within one (1) year of the EDC: Has a construction oversight program been developed and implemented? (Part VI.D.3)**

Yes

**In Year 5: Has training on the MS4 Operator's construction oversight procedures prior to conducting construction oversight been provided? (Part VI.D.3.b.)**

No

**Please clarify the reason for selecting "No" or "N/A" for this item.**

Municipality is working towards meeting deadline.

**In Year 2, Year 3, Year 4, and Year 5: Have the names, titles, and contact information for the individuals who have received construction oversight procedures training been updated? (Part VI.D.3.c.)**

No

**Please clarify the reason for selecting "No" or "N/A" for this item.**

Municipality is working towards meeting deadline.

**In Year 2, Year 3, Year 4, and Year 5: Have the construction oversight procedures been reviewed and updated? (Part VI.D.3.e.)**

No

**Please clarify the reason for selecting "No" or "N/A" for this item.**

Municipality is working towards meeting deadline.

**Annually: Has the inventory of construction sites been updated? (Part VI.D.4.b.)**

Yes

**How many construction sites are on the inventory?**

11

**Within one (1) year of the EDC: Have construction sites been prioritized? (Part VI.D.5.a.)**

Yes

**How many high priority construction sites are on the inventory?**

3

**In Year 2, Year 3, Year 4, and Year 5: Has the construction site prioritization been updated? (Part VI.D.5.c.)**

No

**Please clarify the reason for selecting "No" or "N/A" for this item.**

Municipality is working towards meeting deadline.

**Within three (3) years of the EDC: Have the individuals responsible for reviewing SWPPPs for acceptance received four (4) hours of Department endorsed training in proper erosion and sediment control principles from a Soil & Water Conservation District, or other Department endorsed entity prior to conducting SWPPP reviews and/or approvals? (Part VI.D.6.a.i.)**

Yes

**Annually: Have the names, titles, and contact information for the individuals who have received four (4) hours of Department endorsed training in proper erosion and sediment control principles from a Soil & Water Conservation District, or other Department endorsed entity, for individuals responsible for reviewing SWPPPs been updated? (Part VI.D.6.d.)**

Yes

**Are pre-construction meetings conducted prior to the commencement of construction activity? (Part VI.D.7.)**

Yes

**Within three (3) years of the EDC: Have the individuals responsible for construction site inspections received four (4) hours of Department endorsed training in proper erosion and sediment control principles from a Soil & Water Conservation District, or other Department endorsed entity prior to conducting construction site inspections? (Part VI.D.8.a.i.)**

Yes

**Annually: Have all sites with construction activity identified in the inventory been inspected during active construction after the pre-construction meeting, or sooner if deficiencies are noted that require attention? (Part VI.D.8.c.)**

Yes

**Annually: Have the names, titles, and contact information for the individuals who have received four (4) hours of Department endorsed training in proper erosion and sediment control principles from a Soil & Water Conservation District, or other Department endorsed entity, for individuals responsible for construction site inspections been updated? (Part VI.D.8.d.)**

Yes

**Are final construction site inspections conducted? (Part VI.D.9.)**

Yes

**Please enter any comments related to the questions in this section below:**

N/A

#### **Minimum Control Measure 5**

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**Annually: Has the inventory of post-construction SMPs been updated? (Part VI.E.2.c.)**

Yes

**How many post-construction SMPs are on the inventory?**

232

**Within five (5) years of the EDC: Have the required components been included in the post-construction SMP inventory? (Part VI.E.2.d.)**

No

**Please clarify the reason for selecting "No" or "N/A" for this item.**

Municipality is working towards meeting deadline.

**Within one (1) year of the EDC: Has a post-construction SMP inspection and maintenance program been developed and implemented? (Part VI.E.4.)**

Yes

**Has each post-construction SMP identified in the inventory been inspected at the required frequency? (Part VI.E.4.a.)**

No

**Please clarify the reason for selecting "No" or "N/A" for this item.**

Municipality is working towards meeting deadline.

**How many post-construction SMPs have been inspected at the required frequency?**

0

**In Year 5: Has training on the MS4 Operator's post-construction SMP inspection and maintenance procedures prior to conducting post-construction SMP inspection and maintenance been provided? (Part VI.E.4.b.)**

No

**Please clarify the reason for selecting "No" or "N/A" for this item.**

Municipality is working towards meeting deadline.

**Annually: Have names, titles, and contact information for the individuals who have received post-construction SMP inspection and maintenance procedures training updated? (Part VI.E.4.c.)**

Yes

**In Year 2, Year 3, Year 4, and Year 5: Have the post-construction SMP inspection and maintenance procedures been reviewed and updated? (Part VI.E.4.d.)**

No

**Please clarify the reason for selecting "No" or "N/A" for this item.**

Municipality is working towards meeting deadline.

**Please enter any comments related to the questions in this section below:**

N/A

#### **Minimum Control Measure 6**

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**Within three (3) years of the EDC: Have best management practices (BMPs) been incorporated into the municipal facility program and municipal operations program? (Part VI.F.1.)**

No

**Please clarify the reason for selecting "No" or "N/A" for this item.**

Municipality is working towards meeting deadline.

**Within three (3) years of the EDC: Has a municipal facility program been developed and implemented? (Part VI.F.2.a.)**

No

**Please clarify the reason for selecting "No" or "N/A" for this item.**

Municipality is working towards meeting deadline.

**In Year 5: Has training on the MS4 Operator's municipal facility procedures prior to conducting municipal facility procedures been provided? (Part VI.F.2.a.ii.)**

No

**Please clarify the reason for selecting "No" or "N/A" for this item.**

Municipality is working towards meeting deadline.

**In Year 4 and Year 5: Have the names, titles, and contact information for the individuals who have received municipal facility procedures training been updated? (Part VI.F.2.a.iii.)**

No

**Please clarify the reason for selecting "No" or "N/A" for this item.**

Municipality is working towards meeting deadline.

**In Year 4 and Year 5: Have the municipal facility procedures been updated? (Part VI.F.2.a.iv.)**

No

**Please clarify the reason for selecting "No" or "N/A" for this item.**

Municipality is working towards meeting deadline.

**Within two (2) years of the EDC: Has a municipal facility inventory been developed? (Part VI.F.2.b.i.)**

No

**Please clarify the reason for selecting "No" or "N/A" for this item.**

Municipality is working towards meeting deadline.



**In Year 3, Year 4, and Year 5: Has the municipal facility inventory been updated? (Part VI.F.2.b.ii.)**

No

**Please clarify the reason for selecting "No" or "N/A" for this item.**

Municipality is working towards meeting deadline.

**Within three (3) years of the EDC: Have the municipal facilities been prioritized? (Part VI.F.2.c.i.)**

No

**Please clarify the reason for selecting "No" or "N/A" for this item.**

Municipality is working towards meeting deadline.

**In Year 4 and Year 5: Has the municipal facility prioritization been updated? (Part VI.F.2.c.iii.)**

No

**Please clarify the reason for selecting "No" or "N/A" for this item.**

Municipality is working towards meeting deadline.

**Within five (5) years of the EDC: Has a municipal facility specific SWPPP for each high priority municipal facility been developed? (Part VI.F.2.d.i.)**

No

**Please clarify the reason for selecting "No" or "N/A" for this item.**

Municipality is working towards meeting deadline.

**How many municipal facility specific SWPPPs for high priority municipal facilities have been developed?**

0

**In Year 5: Has all wet weather visual monitoring of the monitoring locations at all high priority municipal facilities been conducted? (Part VI.F.2.d.ii.a))**

No

**Please clarify the reason for selecting "No" or "N/A" for this item.**

Municipality is working towards meeting deadline.

**At how many high priority municipal facilities was wet weather visual monitoring completed?**

0

**At how many monitoring locations was wet weather visual monitoring completed?**

0

**In Year 5: Has a comprehensive site assessment for each high priority municipal facility been completed? (Part VI.F.2.d.ii.c))**

No

**Please clarify the reason for selecting "No" or "N/A" for this item.**

Municipality is working towards meeting deadline.

**At how many high priority municipal facilities was a comprehensive site assessment completed?**

0

**In Year 5: Has a comprehensive site assessment for each low priority municipal facility been completed? (Part VI.F.2.e.ii.c))**

No

**Please clarify the reason for selecting "No" or "N/A" for this item.**

Municipality is working towards meeting deadline.

**At how many low priority municipal facilities was a comprehensive site assessment completed?**

0

**Within three (3) years of the EDC: Has a municipal operations program been developed? (Part VI.F.3.a.)**

No

**Please clarify the reason for selecting "No" or "N/A" for this item.**

Municipality is working towards meeting deadline.

**In Year 5: Has training on the MS4 Operator's municipal operations procedures prior to conducting municipal operations been provided? (Part VI.F.3.a.ii.)**

No

**Please clarify the reason for selecting "No" or "N/A" for this item.**

Municipality is working towards meeting deadline.

**In Year 4 and Year 5: Have the names, titles, and contact information for the individuals who have received municipal operations procedures training been updated? (Part VI.F.3.a.iii.)**

No

**Please clarify the reason for selecting "No" or "N/A" for this item.**

Municipality is working towards meeting deadline.

**In Year 4 and Year 5: Have the municipal operations procedures been reviewed and updated? (Part VI.F.3.a.iv.)**

No

**Please clarify the reason for selecting "No" or "N/A" for this item.**

Municipality is working towards meeting deadline.

**Within three (3) years of the EDC: Have catch basins in need of inspection been identified? (Part VI.F.3.c.i.)**

No

**Please clarify the reason for selecting "No" or "N/A" for this item.**

Municipality is working towards meeting deadline.

**Within three (3) years of the EDC: Has catch basin inspection information been inventoried? (Part VI.F.3.c.ii.)**

No

**Please clarify the reason for selecting "No" or "N/A" for this item.**

Municipality is working towards meeting deadline.

**In Year 5: Have all streets, bridges, parking lots, and right of ways been swept? (Part VI.F.3.d.i.a))**

No

**Please clarify the reason for selecting "No" or "N/A" for this item.**

Municipality is working towards meeting deadline.

**What percentage of the total streets, bridges, parking lots, and right of ways have been swept?**

100

**Annually: Have all streets in business districts and commercial areas been swept? (Part VI.F.3.d.i.b))**

Yes

**Within five (5) years of the EDC: Have roads, bridges, parking lots, and right of way maintenance specific BMPs been implemented? (Part VI.F.3.d.ii.)**

No

**Please clarify the reason for selecting "No" or "N/A" for this item.**

Municipality is working towards meeting deadline.

**Within five (5) years of the EDC: Have winter road maintenance specific BMPs been implemented? (Part VI.F.3.d.iii.)**

No

**Please clarify the reason for selecting "No" or "N/A" for this item.**

Municipality is working towards meeting deadline.

**Please enter any comments related to the questions in this section below:**

N/A

## **Part VIII**

**Does the MS4 Operator discharge to an impaired water listed in Appendix C of GP-0-24-001?**

Yes

**For which pollutant(s) is the waterbody impaired? Select the pollutants for all the impaired waters listed in Appendix C of GP-0-24-001 to which the MS4 Operator discharges.**

Phosphorus

**Which requirements in this Part were completed as a coalition/group, if any?**

NONE PROVIDED

### **Phosphorus**

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**Within three (3) years of the EDC: Has the comprehensive system mapping been updated, in a geographic information system (GIS), to include MS4 infrastructure and sewershed information for each MS4 outfall and ADA MS4 outfall discharging to a phosphorus impaired water listed in Appendix C? (Part VIII.A.1.a.)**

No

**Please clarify the reason for selecting "No" or "N/A" for this item.**

Municipality is working towards meeting deadline.

**Within three (3) years of the EDC: Has the comprehensive system mapping been updated, in a geographic information system (GIS), to include the listed items for each MS4 outfall discharging to a phosphorus impaired water listed in Appendix C? (Part VIII.A.1.b.)**

No

**Please clarify the reason for selecting "No" or "N/A" for this item.**

Municipality is working towards meeting deadline.

**Within three (3) years of the EDC: Has the comprehensive system mapping been updated, in a geographic information system (GIS), to include ADA MS4 outfalls discharging to a phosphorus impaired water listed in Appendix C? (Part VIII.A.1.c.)**

No

**Please clarify the reason for selecting "No" or "N/A" for this item.**

Municipality is working towards meeting deadline.

### **Minimum Control Measure 1**

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**Twice a year, in Year 4 and Year 5: Have educational messages with information specific to phosphorus been provided? (Part VIII.A.2.b.)**

No

**Please clarify the reason for selecting "No" or "N/A" for this item.**

Municipality is working towards meeting deadline.

### **Minimum Control Measure 3**

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**Within five (5) years of the EDC: Has the number of each item listed in Part VIII.A.1.b. been included on the MS4 outfall inventory for each associated MS4 outfall? (Part VIII.A.4.)**

No

**Please clarify the reason for selecting "No" or "N/A" for this item.**

Municipality is working towards meeting deadline.

### **Minimum Control Measure 4**

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**How many high priority construction sites discharge to the phosphorus impaired water(s)?**

0

### **Minimum Control Measure 6**

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**In Year 4 and Year 5: Have all streets located in sewersheds discharging to phosphorus impaired segments been swept? (Part VIII.A.7.a.)**

No

**Please clarify the reason for selecting "No" or "N/A" for this item.**

Municipality is working towards meeting deadline.

**What percentage of streets located in sewersheds discharging to phosphorus impaired segments have been swept?**

100

**Please enter any comments related to the questions in this section below:**

N/A

## **Part IX**

**Does the MS4 Operator discharge to a TMDL listed in Table 3 of GP-0-24-001?**

No

**Please enter any comments related to the questions in this section below:**

NONE PROVIDED

## **Interim Progress Status**

### **Interim Progress Resources**

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Use the following webpages for more information on the permit and fact sheet:

[MS4 Permit Webpage](#)

[MS4 Toolbox](#)

**Have you reviewed compliance items due within two years of EDC?**

Yes

**Have you reviewed compliance items due within three years of EDC?**

Yes

**Have you reviewed compliance items due within four years of EDC?**

Yes

**Have you reviewed compliance items due within five years of EDC?**

Yes

**Have you reviewed compliance items which need to be completed routinely (annually, every five (5) years, etc.)?**

Yes

**Please enter any comments related to the questions in this section.**

N/A

## **Certification**

**The ranking elected official or Principal Executive Officer for the MS4 Operator will be signing the form.**

Yes

**As the Ranking Elected Official or Principal Executive Officer, please download the certification form using the link below. Complete and sign the certification. Then, upload the certification form to this Interim Progress Certification and/or Annual Report.**

[Certification Form](#)

**Attach completed certification form.**

Town of Newburgh\_MS4 - Signed Certification\_3-28-25.pdf - 03/28/2025 02:50 PM

**Comment**

*NONE PROVIDED*