

July 26, 2017

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U.S. EPA
REGION II
CARIBBEAN ENVIRONMENTAL PROTECTION DIVISION

Dear Ms. Rodríguez:

**NPDES PERMIT NO. PRR040001 ANNUAL REPORT 2017
AUTONOMOUS MUNICIPALITY OF CAGUAS SMALL SEPARATE STORM
SEWER SYSTEM (MS4)**

As requested in the provisions of the Clean Water Act, as amended, we are submitting our Annual Report for the NPDES Permit mentioned in reference. This report corresponds to the November 1, 2015 – June 30 2017 period.

If you need any further information, please contact me, the Environmental Specialist for the Municipal Stormwater Management Program at (787) 653-8833, extension 1717 or 1733.

Cordially,



Rosa M. Ramos Alicea
Acting Director
Environmental Affairs Office

RMR

Enclosure



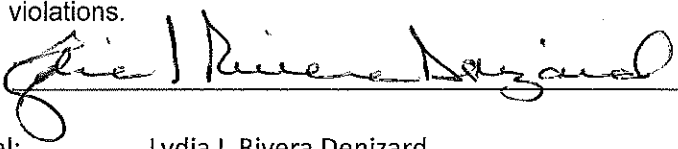
EPA Region 2 Small MS4 General Permit Annual Report 2017

General Information:

Small MS4 Annual Report for period: NOV 2015- JUN 2017		
MS4 Permit Number: PR040001		
Name of MS4: Autonomous Municipality of Caguas		
Primary Contact: Guillermo Rivera Cruz	Title: Director, Environmental Affairs Office	
Telephone: (787) 653-6354	Email Address: guillermor@caguas.gov.pr	
Mailing Address: PO Box 907		
City: Caguas	State: PR	Zip Code: 00726-0907

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 gathered and evaluated 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, 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.

Signature of Mayor/ Elected Official: 

Print name Of Mayor/ Elected Official: Lydia I. Rivera Denizard

Title: Acting Mayor Date: 27-07-2017



Annual Report Information Requirements:

I. Self-Assessment review of compliance with the permits terms and conditions (section 3.4.2.1)

Caguas is updating the Stormwater Management Plan (SWMP) to include the 2016 MS4 new requirements. The updated SWMP must be submitted to EPA on or before December 27, 2017. For this reporting period, Caguas used the approved SWMP. Table 1 summarizes Caguas self-assessment of compliance based on the previous MS4 Permit.

Table 1. Requirements of Caguas's NPDES Permit and compliance with 2006 MS4 Permit terms and conditions

Minimum Control Measures and Permit Requirements	Compliance with the permits terms and conditions
<p>Public Education and Outreach on Storm Water Impacts</p> <p>4.2.1.1 The permittee must implement a public education program to distribute educational materials to the community or conduct equivalent outreach activities about the impacts of storm water discharges on water bodies and the steps that the public can take to reduce pollutants in storm water runoff.</p>	<p>Caguas has implemented a public education program effectively.</p> <ol style="list-style-type: none"> 1. Caguas distributed educational material such as brochures during educational activities with information in how to reduce storm water pollution. 2. Caguas offered educational activities such as workshops, trainings and seminars to target audience such as students from all levels and general public in communities. 3. The Environmental Affairs Office webpage offers educational material in how to reduce stormwater pollution and laws and regulation regarding stormwater pollution issues.
<p>Public Involvement / Participation</p> <p>4.2.2.1 The permittee must at a minimum, comply with State and local public notice requirements when implementing a public involvement/ participation program.</p>	<ol style="list-style-type: none"> 1. Caguas has conducted public hearing to discuss the MS4 annual report using all media available (internet, press, flyers, etc.), but have had zero audience. Instead, Caguas has used the Municipality Land Use Community Boards meetings, as their members represent all wards of the municipality.
<p>Illicit Discharge Detection and Elimination</p> <p>4.2.3.1.1 Develop, implement and enforce a program to detect and eliminate illicit discharges (as defined in 40 CFR §122.26(b)(2)) into the permittee small MS4;</p> <p>4.2.3.1.2 Develop, if not already completed, a storm sewer system map, showing the location of all outfalls and the names and location of all waters of the United States that receive discharges from those outfalls;</p> <p>4.2.3.1.3 To the extent allowable under State or local law, effectively prohibit, through ordinance, or</p>	<ol style="list-style-type: none"> 1. Caguas has an enforcement program to detect and eliminate illicit discharges into the MS4. It involves the Environmental Affairs Office, the Municipal Police and the Public Works Department. 2. Caguas had not completed a storm sewer system map showing the location of all outfalls. Due to the economic recession, less funds have been assigned to this task. Nevertheless, there has been slow but keep continuous advance towards the completion of this task. 3. Caguas had adopted articles into its municipal code and regulations to prohibit non-stormwater

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<p>other regulatory mechanism, non-storm water discharges into the permittee storm sewer system and implement appropriate enforcement procedures and actions; 4.2.3.1.4 Develop and implement a plan to detect and address non-storm water discharges, including illegal dumping, to the permittees' system;</p>	<p>discharges to the MS4, and the enforcement procedures have been developed. 4. Caguas has developed and implemented a formal plan, and the dry weather field screening to detect and address non-stormwater discharges to the MS4 is schedules to start during the next permit cycle.</p>
<p>Construction Site Storm Water Runoff Control 4.2.4.1 The permittee must develop, implement, and enforce a program to reduce pollutants in any storm water runoff to their small MS4 from construction activities that result in a land disturbance of greater than or equal to one acre. Reduction of storm water discharges from construction activity disturbing less than one acre must be included in your program if that construction activity is part of a larger common plan of development or sale that would disturb one acre or more.</p>	<ol style="list-style-type: none"> 1. Caguas had adopted a municipal ordinance that requires developers to obtain coverage under the General Consolidated Permit from the Puerto Rico Environmental Quality Board (EQB). 2. Caguas had developed procedures for construction site plan review. 3. Caguas had developed some procedures for receipt and consideration of information submitted by the public regarding construction sites. 4. Caguas had developed procedures for site inspection and enforcement of control measures for construction sites, which includes inspections and maintenance of records of the enforcement executed on construction sites.
<p>Post-Construction Storm Water Management in New Development and Redevelopment 4.2.5.1.1 Develop, implement, and enforce a program to address storm water runoff from new development and redevelopment projects that disturb greater than or equal to one acre, including projects less than one acre that are part of a larger common plan of development or sale, that discharge into the permittee small MS4; 4.2.5.1.3 Use an ordinance or other regulatory mechanism to address post-construction runoff from new development and redevelopment projects to the extent allowable under State or local law; and</p>	<ol style="list-style-type: none"> 1. Caguas had not developed formal procedures for site inspection and enforcement of control measures for construction sites, but inspects and maintain records of the enforcement executed on construction sites. 2. Caguas has not developed an ordinance or other regulatory mechanism to address post-construction runoff from new developments and redevelopments because many regulations related to stormwater management in new development and redevelopment required by this permit, are responsibilities of State and Federal regulatory agencies. Caguas depends mainly in State regulations and actions to comply enforcement. Nevertheless, Caguas will make efforts towards complying with these permit conditions.
<p>Pollution Prevention and Good Housekeeping for Municipal Operations 4.2.6.1.1 Develop and implement an operation and maintenance program... has the ultimate goal of preventing or reducing pollutant runoff from municipal operations; and 4.2.6.1.2 Employee training to prevent and reduce storm water pollution from activities such as park and open space maintenance, fleet and building maintenance, new construction and land disturbances, and storm water system maintenance.</p>	<ol style="list-style-type: none"> 1. Caguas has implemented an operation and maintenance program for preventing or reducing pollutant runoff from municipal operations. 2. Caguas has implemented an employee training program to prevent and reduce stormwater pollution in municipal operations and maintenance activities.

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II. Assessment of the appropriateness of the selected BMPs (section 3.4.2.2)

The following tables includes the assessment of the current BMPs, and if it will be included in the new SWMP or if it will be substituted for another.

MCM Public Education and Outreach

BMP Description	Is the BMP Appropriate?	Modification(s) to BMP for next permit cycle
Distribute Stormwater Education Materials	Yes	BMP is appropriate and is update as needed to comply with permit's requirements.
Stormwater Workshops	Yes	BMP is appropriate and is update as needed to comply with permit's requirements.
Stormwater Workshops for Industry	No	This BMP will be substituted for MSGP inspections as needed, to verify compliance with this permit.
Educational Website	Yes	BMP is appropriate and is update as needed to comply with permit's requirements.
Create a Stormwater Hotline Link	No	Hot line link has been substituted for various telephone lines in different municipal dependencies.

MCM- Public Participation and Involvement

BMP Description	Is the BMP Appropriate?	Modification(s) to BMP for next permit cycle
Meet with Local Community Groups and Organizations to Involve them in Stormwater Efforts	No	Participation of Community Groups is very low. Instead of using local community groups, Caguas has determined that participating in the Municipal Land Use Community Boards meetings is more effective and is a better way to canalize resources.
Develop and Conduct Periodical "Focus Groups" from the Community to Discuss Stormwater Related Issues	No	There is not enough personnel to develop this BMP. Caguas has determined that participating in the Land Use Community Boards meetings is more effective and is a better way to canalize resources.
Conduct Public Hearings on Stormwater Issues	No	If not feasible a public hearing, the Land Use Community Boards meetings will be used instead, as their members represent all wards of the municipality.

MCM Pollution Prevention and Good Housekeeping

BMP Description	Is the BMP Appropriate?	Modification(s) to BMP for next permit cycle
Employee Training	Yes	Update as needed to comply with permit requirements.
Stormwater Inspections	Yes	Modification as needed to add permit requirements.
Storm System Cleaning and Recordkeeping	Yes	None

MCM Illicit Discharge Detection and Elimination

BMP Description	Is the BMP Appropriate?	Modification(s) to BMP for next permit cycle
Create Municipal Ordinance(s) for Detection and Elimination of Illegal Discharges	Yes	BMP will be substituted for Review and Update Municipal Ordinance
Stormwater System Map of MS4	Yes	Continue with mapping and update as needed, depending on budget availability.
Inventory of Federally Impaired Water Bodies	Yes	Update as needed.
Digitalized Maps Upgrading System	Yes	Continue in the next permit cycle.
Develop an Inspection and Enforcement Program	Yes	Revise and update as needed.

MCM Construction Site Runoff Control

BMP Description	Is the BMP Appropriate?	Modification(s) to BMP for next permit cycle
Creation of Ordinance(s) for the Review of Erosion and Sediment Control (ESC) for New Developments and Construction Projects greater or equal to 1 acre	Yes	BMP will be substituted for Review and Update Municipal Ordinance
Develop Procedures for Review of Required Control Measures and Reports	Yes	Update as needed.
Construction Site Inspections	Yes	Update inspection procedures as needed.

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MCM Post-Construction Runoff Control

BMP Description	Is the BMP Appropriate?	Modification(s) to BMP for next permit cycle
Development of Municipal Ordinance(s) to Support Post-Construction Runoff Control	Yes	Determine by which means the municipality will have the authority to perform this task.
Inspection Program and Inventory of Structural Runoff Controls	Yes	Determine by which means the municipality will have the authority to perform this task.

III. Status of plans or activities required by section 2.1 and/or 2.2 (section 3.4.2.3):

- a. Compliance of Section 2.1: Water Quality Standards Effluent Limitations: Identification of all discharges determined to be causing or contributing to an exceedance of WQ standards and a description of the response, including all in section 2.1.1.c

Caguas is studying all the available data at the State and federal level including, but not limited to list of contaminated water bodies and data available on the EPA Web pages (EPA Enforcement and Compliance History Online website) to assess whether the discharges causes or contributes to an exceedance on applicable water quality standards.

- b. Compliance of Section 2.2: Discharges to Water Quality Impaired Waters : The permittee shall identify in the SWMP and Annual Reports all discharges, including both outfalls and interconnections to other MS4 or other separate storm sewer systems, that:
- i. Are subject to an approved Total Maximum Daily Load (TMDL) as identified in Section 2.2.1; or
 - ii. Discharge to a water identified as impaired by the PREQB pursuant to Section 303(d) of the Clean Water Act and for which TMDL development has been identified as necessary, but for which a TMDL has not yet been approved.

According to PREQB Puerto Rico 2016 305(b) and 303(d) Integrated Report, all water bodies that pass through Caguas are identified as impaired. Based on the information available on EPA's Website, for the moment there are no waterbodies segments in Caguas that are subject to an approved TMDL. Nevertheless, Rio Grande de Loiza (PRER14A2), Rio Bairoa, Rio Cagüitas, and Rio Turabo assessment units have high priority to development of TMDL. Caguas has not yet identified outfalls with an ID.

SDA.

IV. Assessment of the progress towards achieving the measurable goals and objectives of each control measure (section 3.4.2.4)

The following tables summarizes the performance of Caguas MS4 program for each MCM for this permit cycle, as well as the progress towards achieving measurable goals of each control measure.

Public Education and Outreach

BMP	Measurable Goal	Target Audience Reached	Summary of Results
Distribute Stormwater Education Materials	Implementation.	General Public	Different educational material was distributed in municipal offices and educational activities.
	Revision of educational material and available new information.	Completed? YES	Our educational material is revised and updated at least once a year.
Stormwater Workshops	Deliver and document workshops within our municipality. Specify audience targeted.	226 students from private and public elementary schools 19 food businesses 40 future businesses	Educational efforts were made in schools and food businesses (Plaza de Mercado and Downtown) regarding stormwater pollution prevention
	Revision of workshop content and/or actualizations.	Completed? YES	Workshop content is adapted to fit stormwater pollution control issues.
Stormwater Workshops for Industry	Deliver and document the workshop at the industrial facilities.	Completed? NO	This BMP was substituted for compliance inspections
	Follow up meeting delivery and documentation.	Completed? YES	Periodic communication has been established due to noncompliance issues.
Educational Website	Electronic documentation of number of hits to Stormwater Section and monthly reports from officials.	1,038 hits	There were 4 months with no data available.
	Meetings and documentation of periodic reviews of content and efficiency.	Completed? YES	The website contents was updated and documented.
Create a Stormwater Hotline Link	Documentation such as biannual reports, incidents handling and follow up. Review number and types of complaints received to assess program effectiveness and identify problem areas at the end of the permit period.	Completed? YES	A total of 76 Requests for Services were received in the Environmental Affairs Office
	Make periodic reviews and document annual meeting.	Completed? YES	Results are documented in monthly reports.

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Public Involvement/ Participation

BMP	Measurable Goal	Target Audience Reached	Summary of Results
Meet with Local Community Groups and Organizations to Involve them in Stormwater Efforts	Establish a follow-up system with group through periodical meeting, calls, letters, etc.	38 educational activities about recycling	Communities and other activities participants received workshops on how to recycle.
	Continue programs and clean up events and evaluate types and amounts of wastes collected or dropped-off to assess program effectiveness.	City wide (MS4 and non-MS4)	There are a total of 160 communities, 111 private and public schools, 243 private sector entities, 54 state and municipal entities, and 11 industries participating from our waste reduction program (recycling).
Develop and Conduct Periodical "Focus Groups" from the Community to Discuss Stormwater Related Issues	Implement and document Focus Group meetings.	25 members	We are using the Municipal Land Use Community Boards from the Planning Office as our focal group. These Boards include representatives from all the municipality's communities sectors.
	Documents follow up actions and/or direct feedback.	1	Documents were required for the reporting cycle.
Conduct Public Hearings on Stormwater Issues	Conduct Public Hearings periodically and discuss Phase II Annual Reports. Document comments and hearings.	2 meetings	Since there has been 0 attendance in public hearings, we are using instead the the Municipal Land Use Community Boards from the Planning Office. These Boards have representatives from all the municipality's communities sectors.

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Illicit Discharge Detection and Elimination (IDDE)

BMP	Measurable Goal	Completed (Yes or No)	Summary of Results
Ordinance or Other Regulatory Mechanism	Upgrade existing ordinances and/or develop Citywide ordinance to outlaw all illicit discharges and establish penalties. Use other regulatory mechanisms and create an inventory. Document process.	YES	Municipal Public Order Code, which included articles related to illicit discharges, is now under an evaluating process for amendments.
	Review of Municipal Ordinances created regarding stormwater and document procedures.	YES	Municipal Public Order Code, which included articles related to illicit discharges, is now under an evaluating process for amendments.
Storm Sewer System Map	Development of the storm sewer system map in the 5 sections specified, complete at least 20% after every year with final goal of having complete map by the end of the first permit term. Document completion percent based on area covered.	NO	Of the 5 sections of the map, section 1, the largest one. Has been completed. This section includes Rio Turabo, Rio Cagüitas and Rio Grande de Loíza basins. Section 2.1 has been digitalized basins, which is part of the Rio Bairoa Basin.
Inventory of Federally Impaired Water Bodies	Identify and prioritize illicit discharge problem areas according to list.	YES	Thru the development of the storm water system map and available state and federal data, we are in the process of identifying priority areas.
Digitalized Maps Upgrading System	Implement by the end of the permit term.	NO	System information (data base) is in the process of being compiled and there is no need for upgrading the information yet. We have our GIS system in place and operating.
Develop an Inspection and Enforcement Program	Implement an Inspection and Enforcement Program with local, state and/or federal agencies. Document number of illicit connections found, repaired and/or corrected, and number of illegal dumping incidents identified and cleaned up. Train city employees on how to identify illicit discharges, proper response to complaints, procedures of notification of violation and actions required. Document efforts.	YES	The Environmental Affairs Office received 76 complaints and the Municipal Police Department received 81 complaints, most of which were eliminated. The police department submitted 36 fines for municipal ordinance violations. The Public Works Department found 6 illicit discharges during storm sewer inspections, which were identified and eliminated. The Municipal Office for Emergency Management handled 21 oil spills on roads and pavement. Only one spill reached a water body in which the Natural and Environmental Resources Department took control of the situation.
	Train city employees the identification of illicit discharges, response to complaints, procedures of notification of violations and actions required.	NO	The Municipal Police is trained every 2 years. Thus this BMP is scheduled for next reporting cycle.

SPD



Construction Site Runoff Control

BMP	Measurable Goal	Completed (Yes or No)	Summary of Results
Ordinance or Other Regulatory Mechanism	Implement program.	YES	A digital copy of the ESC plan is solicited by the Municipal Permits Office to every project evaluated in the Municipality that constructs /disturbs 1 acre or more of land. This to support project evaluations and improve site ESC inspections.
Procedures for Review of Control Measures and Reports	Implement in process of request for endorsement from the Municipality.	YES	7 construction projects greater than 1 acre
	Count and document reviewed endorsement requests biannually.	YES	Reported annually by the Permit's Office
Construction Site Inspections	Implement program and complete annual reports with number of inspections completed.	YES	7 of 9 construction sites greater than 1 acre were inspected: 1 administrative fine, 2 referred to PRNRED, 1 referred to EQB, 1 stop order; 15 smaller construction sites were inspected: 7 stop orders, 4 administrative fines, 2 referred to PRNRED, 2 referred to EQB, 1 referred to Health Department, Inspections are made periodically according to citizen's complaints, extensive developments (residential, commercial or industrial), and projects near water bodies, susceptible or environmentally sensitive areas. Municipal projects are inspected on a regular basis.
	Annual evaluation of program.	YES	

ES

Post- construction Storm Water Management in New Development and Redevelopment

BMP	Measurable Goal	Completed (Yes or No)	Summary of Results
Ordinance or Other Regulatory Mechanism	Limit thru ordinance, surface runoff volumes from new developments and redevelopment projects to reduce runoff pollution loadings. Promote the use of onsite stormwater treatment options and vegetative practices, rather than hard connections of runoff from impervious surfaces to the municipal system.	NO	In process of determining by which means the municipality will have the authority to perform this task.
	Draft an ordinance to require submittal and review of post-construction stormwater management plans (CES Plans) prior to construction for all new construction and redevelopment.	NO	N/A
	Establish a protocol for determining responsibility for maintenance of control measures.	NO	In process of determining by which means the municipality will have the authority to perform this task.



Site Inspection Program & Inventory of Structural Runoffs	Research current examples of programs. Develop a program that establishes schedules, locations, and responsible parties for conducting inspections of all stormwater control measures in the City.	NO	In process of identifying the stormwater control measures in the City.
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Pollution Prevention and Good House Keeping for Municipal Operations

BMP	Measurable Goal	# Employees Attended	Summary of Results		
Employee Training Program	Implement program by training all appropriate City personnel at least once per year.	162	Employees from the Infrastructure, Landscaping, Public Works and Building Conservation brigades trained		
		45	Employees from the Municipal Building Safety Committee trained		
Stormwater Inspections	Develop a program for conducting periodic inspections of stormwater management at the municipal facilities. Dry weather screening should also be conducted. Program should include responsibilities of involved parties and protocol for conducting and reporting results. Develop a checklist format inspection form.	YES	5 inspections in the Center for Municipal Operations 1 inspection in the Municipal Sports Complex		
Storm System Cleaning and Recordkeeping	Record and evaluate all maintenance efforts performed by the City and all other requests for such tasks to other local, state and federal agencies. Report semiannually the number of efforts and brief description of tasks completed.	# Inspections	# Maintenance Efforts	# Replaced Damaged Stormwater Infrastructure	
		281	89	91	

V. Outfall screening and monitoring data collected by or on behalf of MAC- pursuant 2.4.4 y 3.3 (section 3.4.2.5)

Caguas did not performed screening and monitoring during this reporting period, as required by this section.

VI. Description of activities for the next reporting cycle (section 3.4.2.6)

The following activities will be performed during the next reporting cycle:

Public Education and Outreach

- Educational activities will be performed in communities, schools, businesses and to municipal employees to educate them about the hazards associated with illegal discharges, improper disposal of waste, the impact that stormwater discharges can have on local waterways, as well as the steps that the public can take to reduce pollutants in stormwater.
- Revise and update educational material as needed.

Public Involvement

- Make SWMP available to the general public to get input from them.
- Explain the contents of the SWMP during the Municipal Land Use Community Boards meetings, to give members the opportunity for public comments.

Illicit Discharge Detection and Elimination

- Determine whether Caguas may be a source of the pollutants of concern by referring to the CWA Section 303(d) and then determining if discharges from the MS4 would be likely to contain the pollutants of concern at levels of concern.
- Update the SSO inventory.
- Continue to develop the MS4 digitalized map.
- Assessment and priority ranking of catchments in terms of their potential to have illicit discharges and SSOs and the related public health significance.
- Dry weather screening and sampling.
- Illicit discharges inspections to identify responsible parties and require discharge elimination.

Construction Site Stormwater Runoff Control

- Construction site inspections on all private and public construction sites to require state and federal (if applicable) compliance.

Stormwater Management in New Development and Redevelopment

- Develop, to the extent allowed under the Commonwealth of Puerto Rico and local law, a program to control stormwater discharges from new development and redevelopment sites that discharges to the MS4 and disturbs one acre or more.

Pollution Prevention and Good Housekeeping

- Revise written operation and maintenance procedures for the municipal activities listed in the permit.
- Perform SWPPP inspections in required municipal facilities.

Other activities to be performed

- Complete updating the SWMP and submit it to EPA

VII. Description of any changes in identified BMPs or measure goals.

The following table summarizes the changes that will be evaluated and the modifications that may take effect.

MCM	BMP Description	Modification(s) to goals or BMP for next permit cycle
Public Education and Outreach	Stormwater Workshops for Industry	This BMP will be substituted for MSGP inspections as needed (inquiries), to verify compliance with this permit.
	Create a Stormwater Hotline Link	Hot line link has been substituted for various telephone lines in different municipal dependencies.
Public Participation and Involvement	Meet with Local Community Groups and Organizations to Involve them in Stormwater Efforts	Participate in the Municipal Land Use Community Boards Committee meetings
	Develop and Conduct Periodical "Focus Groups" from the Community to Discuss Stormwater Related Issues	It will be consolidated with the one above.
	Conduct Public Hearings on Stormwater Issues	If not feasible a public hearing, the Municipal Land Use Community Boards Committee (from the Planning Office) will be used instead, as their members represent all wards of the municipality.
Construction Site Runoff Control	Creation of Ordinance(s) for the Review of Erosion and Sediment Control (ESC) for New Developments and Construction Projects greater or equal to 1 acre	Modification as needed to comply with new requirements.
	Develop Procedures for Review of Required Control Measures and Reports	Update as needed.
	Construction Site Inspections	Update inspection procedures as needed.
Post-Construction Runoff Control	Development of Municipal Ordinance(s) to Support Post-Construction Runoff Control	Determine by which means the municipality will have the authority to perform this task.
	Inspection Program and Inventory of Structural Runoff Controls	Determine by which means the municipality will have the authority to perform this task.
Pollution Prevention and Good Housekeeping	Employee Training	Update as needed
	Stormwater Inspections	Modification as needed to add new permit requirements.
	Storm System Cleaning and Recordkeeping	Update as needed

VIII. Description of activities undertaken by any entity contracted for achieving any measurable goal or implementing any control measure.

The following table describes the activities undertaken by entities contracted by Caguas and the applicable measurable goals.

Entity or person Contracted	Description of applicable measurable goal
Arcadis Puerto Rico	Digitalization of the MS4 map.
Idalia McCormick Calimano	Aids in the SSO detection and notification to PRASA and the illicit discharge inspections, among other tasks.
EC Waste	Solid waste and recycling collection and disposal.
IFCO	Recycling Company
Vivo Recycling	Composting of vegetable materials that is picked up during public service requests and produced during maintenance of public areas.
AA Environmental Inc. (for this reporting period)	Maintenance of Center for Municipal Operations storm sewer system, oil skimmers and parking lot.
Landscaping (12 private contracts and 11 nonprofit organizations)	Landscaping and maintenance of green areas in specific sites throughout Caguas.

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