

**Year 7 Annual Report**  
**New Hampshire Small MS4 General Permit**  
**Reporting Period: July 1, 2024-June 30, 2025**

*\*\*Please DO NOT attach any documents to this form. Instead, attach all requested documents to an email when submitting the form. Also ensure any websites included on this form are to publicly accessible sites\*\**

*Unless otherwise noted, all fields are required to be filled out. If a field is left blank, it will be assumed the requirement or task has not been completed. Please ONLY report on activities between July 1, 2024 and June 30, 2025 unless otherwise requested.*

**Part I: Contact Information**

Name of Municipality or Organization:

EPA NPDES Permit Number:

**Primary MS4 Program Manager Contact Information**

Name:  Title:

Street Address Line 1:

Street Address Line 2:

City:  State:  Zip Code:

Email:  Phone Number:

**Stormwater Management Program (SWMP) Information**

SWMP Location (publicly available web address):

Date SWMP was Last Updated:

If the SWMP is not available on the web please provide the physical address:

## Part II: Self-Assessment

First, in the box below, select the impairment(s) and/or TMDL(s) that are applicable to your MS4. Make sure you are referring to the most recent EPA approved Section 303(d) Impaired Waters List which can be found here:

**Impairment(s)**

Bacteria/Pathogens     
  Chloride     
  Nitrogen     
  Phosphorus  
 Solids/ Oil/ Grease (Hydrocarbons)/ Metals

**TMDL(s)**

Bacteria and Pathogen     
  Chloride     
  Lake and Pond Phosphorus

Clear Impairments and TMDLs

Next, check off all requirements below that have been completed. **By checking each box you are certifying that you have completed that permit requirement fully.** If you have not completed a requirement leave the box unchecked. Additional information will be requested in later sections.

Year 7 Requirements

- Completed catchment investigations associated with Problem Outfalls
- Completed catchment investigations where information gathered on the outfall/interconnection indicated sewer input

Annual Requirements

- Provided an opportunity for public participation in review and implementation of SWMP and complied with State Public Notice requirements
- Kept records relating to the permit available for 5 years and made available to the public
- The SSO inventory has been updated, including the status of mitigation and corrective measures implemented
  - This is not applicable because we do not have sanitary sewer
  - This is not applicable because we did not find any new SSOs
  - The updated SSO inventory is attached to the email submission
  - The updated SSO inventory can be found at the following publicly available website:

- Updated system map due in year 10 with information from completed catchment investigations
- Provided training to employees involved in IDDE program within the reporting period
- Properly stored and disposed of catch basin cleanings and street sweepings so they did not discharge to receiving waters
- All curbed roadways were swept at least once within the reporting period
- Implemented SWPPPs for all permittee owned or operated maintenance garages, public works yards, transfer stations, and other waste handling facilities

- Enclosed all road salt storage piles or facilities and implemented winter road maintenance procedures to minimize the use of road salt
- Updated inventory of all permittee owned facilities as necessary
- O&M programs for all permittee owned facilities have been completed and updated as necessary
- Implemented all maintenance procedures for permittee owned facilities in accordance with O&M programs
- Implemented program for MS4 infrastructure maintenance to reduce the discharge of pollutants
- Inspected all permittee owned treatment structures (excluding catch basins)

*Optional:* If you would like to describe progress made on any incomplete requirements listed above or provide any additional details, please use the box below:

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

#### Annual Requirements

##### *Public Education and Outreach\**

- Annual message was distributed encouraging the proper management of pet waste, including noting any existing ordinances where appropriate
- Permittee or its agents disseminated educational material to dog owners at the time of issuance or renewal of dog license, or other appropriate time
- Provided information to owners of septic systems about proper maintenance in any catchment that discharges to a water body impaired for bacteria

*\* Public education messages can be combined with other public education requirements as applicable (see Appendix F and H for more information)*

*Optional:* If you would like to describe progress made on any incomplete requirements listed above or provide any additional details, please use the box below:

### **Chloride Impairment**

- Implemented the Salt Reduction Plan
- Reported amount of salt applied to all municipally owned and maintained surfaces using the UNH Technology Transfer Center online tool

*Optional:* If you would like to describe progress made on any incomplete requirements listed above or provide any additional details, please use the box below:

Not Applicable.

**Nitrogen Impairment**

Annual Requirements

*Public Education and Outreach\**

- Distributed an annual message in the spring (April/May) that encourages the proper use and disposal of grass clippings and encourages the proper use of slow-release fertilizers
- Distributed an annual message in the summer (June/July) encouraging the proper management of pet waste, including noting any existing ordinances where appropriate
- Distributed an annual message in the fall (August/September/October) encouraging the proper disposal of leaf litter

*\* Public education messages can be combined with other public education requirements as applicable (see Appendix F and H for more information)*

*Good Housekeeping and Pollution Prevention for Permittee Owned Operations*

- Increased street sweeping frequency of all municipal owned streets and parking lots subject to Permit part 2.3.7.a.iii.(c) to a minimum of two times per year (spring and fall) or swept at least once in the spring and implemented a fall leaf litter collection program

*Structural BMPs*

- Installed a structural BMP as a demonstration project within the drainage area of the water quality limited water or its tributaries. The type of BMP installed is (*e.g. biofiltration*):

- Any structural BMPs listed in Attachment 3 to Appendix F already existing or installed in the regulated area by the permittee or its agents was tracked and the nitrogen removal by the BMP was estimated consistent with Attachment 3 to Appendix F. The BMP type, total area treated by the BMP, the design storage volume of the BMP and the estimated nitrogen removed in mass per year by the BMP were documented.

- No BMPs were installed
- The BMP information is attached to the email submission
- The BMP information can be found at the following publicly available website:

Total estimated nitrogen removed in lbs/year from the installed BMPs:

*Optional:* If you would like to describe progress made on any incomplete requirements listed above or provide any additional details, please use the box below:

Not Applicable.

**Phosphorus Impairment**

Annual Requirements

*Public Education and Outreach\**

- Distributed an annual message in the spring (April/May) encouraging the proper use and disposal of grass clippings and encouraging the proper use of slow-release and phosphorus-free fertilizers
- Distributed an annual message in the summer (June/July) encouraging the proper management of pet waste, including noting any existing ordinances where appropriate
- Distributed an annual message in the fall (August/September/October) encouraging the proper disposal of leaf litter

*\* Public education messages can be combined with other public education requirements as applicable (see Appendix F and H for more information)*

*Good Housekeeping and Pollution Prevention for Permittee Owned Operations*

- Increased street sweeping frequency of all municipal owned streets and parking lots subject to Permit part 2.3.7.a.iii.(c) to a minimum of two times per year (spring and fall) or swept at least once in the spring and implemented a fall leaf litter collection program

*Structural BMPs*

- Installed a structural BMP as a demonstration project within the drainage area of the water quality limited water or its tributaries. The type of BMP installed is (*e.g. biofiltration*):

- Any structural BMPs already existing or installed in the regulated area by the permittee or its agents was tracked and the phosphorus removal by the BMP was estimated consistent with Attachment 3 to Appendix F. The BMP type, total area treated by the BMP, the design storage volume of the BMP and the estimated phosphorus removed in mass per year by the BMP were documented.

- No BMPs were installed
- The BMP information is attached to the email submission
- The BMP information can be found at the following website:

Total estimated phosphorus removed in **lbs/year** from the installed BMPs:

*Optional:* If you would like to describe progress made on any incomplete requirements listed above or provide any additional details, please use the box below:

*A structural BMP has not yet been installed within the drainage area of the water quality limited water body, Robinson Pond. The Town is currently in the engineering design and permitting process for structural BMPs at the Town-owned beach and boat launch facilities adjacent to Robinson Pond, which are the priority municipal sites for stormwater retrofit as identified in the LPCP. The Conservation Commission is currently funding final design and permitting. The Town is in the process of applying to the Land & Water Conservation Fund Grant program to fund construction.*

**Solids, Oil and Grease (Hydrocarbons), or Metals Impairment(s)**

Annual Requirements

*Good Housekeeping and Pollution Prevention for Permittee Owned Operations*

- Increased street sweeping frequency of all municipal owned streets and parking lots to a schedule that targets areas with potential for high pollutant loads
  - The street sweeping schedule is attached to the email submission
  - The street sweeping schedule can be found at the following publicly available website:

*Optional:* If you would like to describe progress made on any incomplete requirements listed above or provide any additional details, please use the box below:

*The only water body limited by solids, oils & grease, or metals in Hudson is one segment of the Merrimack River. The Town routinely performs additional sweeping of sidewalks and streets in the downtown area which discharge to this segment.*

**Chloride TMDL**

Annual Requirements

- Implemented Chloride Reduction Plan or Alternative Chloride Reduction Plan
- Reported amount of salt applied to all municipally owned and maintained surfaces using the UNH Technology Transfer Center online tool

*Optional:* If you would like to describe progress made on any incomplete requirements listed above or provide any additional details, please use the box below:

*Not Applicable.*

**Lake and Pond Phosphorus TMDL**

|   |              |
|---|--------------|
| Baseline phosphorus export rate from LPCP Area <b>(lbs/year)[A]:</b>  | <i>155.8</i> |
| Total phosphorus reduction from all nonstructural controls this reporting period <b>(lbs/year) [B]:</b>                               | <i>4.33</i>  |
| Total phosphorus reduction from all structural controls installed this reporting period and all previous years <b>(lbs/year) [C]:</b> | <i>1.0</i>   |
| Phosphorus load increase due to development incurred since baseline loading was calculated in <b>lbs/year [D]:</b>                    | <i>0</i>     |

Current phosphorus export rate from the LPCP Area in **lbs/year [=A-(B+C)+D** from above]: *150.47*

- I certify under penalty of law that all source control and treatment Best Management Practices being claimed for phosphorus reduction credit have been inspected, maintained and repaired in accordance
- with manufacturer or design specification. I certify that, to the best of my knowledge, all Best Management Practices being claimed for a phosphorus reduction credit are performing as originally designed.
  - Implemented all nonstructural control measures **during this reporting period** and documented the measures and their phosphorus reduction. The nonstructural control measure information:
    - is attached to the email submission
    - can be found at the following publicly available website:

Documented the structural control measures implemented during **this reporting period and all**  **previous years**, including location, phosphorus reduction in weight/year, and date of last completed maintenance and inspection for each control. The structural control measure information:

- is not applicable; no structural control measures were implemented
- is attached to the email submission
- can be found at the following publicly available website:

The LPCP: (select one of the following options. If you submitted your LPCP in a prior annual report and have an updated website, please include the website below)

- was submitted in a prior annual report
- is attached to the email submission
- can be found at the following publicly available website:

<https://www.hudsonnh.gov/bc-swc>

*Optional:* If you would like to describe progress made on any incomplete requirements listed above or provide any additional details, please use the box below:

*Optional:* Use the box below to provide any additional information you would like to share as part of your self-assessment:

*The Nashua Regional Planning Commission (NRPC) applied to NHDES for an EPA 604(b) planning grant in the 2024 application round, however, the application was ranked fourth out of seven. Funding was awarded to only the top three highest ranked applications. The funding was intended to support development of a complete nine-element watershed management plan for Robinson Pond, in part to investigate the potential for internal phosphorus loading in Robinson Pond. Initial sediment sampling data collected during development of the 2024 Robinson Pond Water Quality Protection Plan by NRPC suggested internal phosphorus loading may be a considerably larger source of pollutant loading to Robinson Pond than was attributed to internal loading in the 2010 TMDL. If the Town or NRPC are successful in identifying funding to further investigate and calculate the relative contribution of internal loading to phosphorus concentrations in Robinson Pond, the Town understands this may reduce the phosphorus reductions required from stormwater sources within the watershed.*

*The Town is also pursuing funding under the National Park Service (NPS) Land & Water Conservation Fund (LWCF) to support redevelopment of the Town-owned boat launch and beach on Robinson Pond to improve outdoor recreational public access to Robinson Pond and install structural stormwater BMPs to make progress towards MS4 pollutant reduction requirements. This project has been designed and permitted. The Town made an application to LWCF in 2024 but was unsuccessful in raising the local matching funds required. The Town intends to reapply to LWCF in 2025 and divide the project into two phases. Funding award is conditional on the Town raising local matching funds and award under the competitive NPS LWCF program. However, even if the Town is awarded funding under this round, LWCF funds would not be made available to the Town until approximately November 2026. Therefore, construction of the first phase of the project likely would not begin until the spring of 2027 at the earliest.*

### Part III: Receiving Waters/Impaired Waters/TMDL

Have you made any changes to your lists of receiving waters, outfalls, or impairments since the NOI was submitted?

- Yes  
 No

If yes, describe below, including any relevant impairments or TMDLs:

*Additional Category 4 and 5 impairments (excluding Mercury) not included in the NOI and current as of the 2024 305(b)/303(d) list include:*

*NHLAK700061203-06-01 Robinson Pond: Chlorophyll-a, Cyanobacteria hepatotoxic microcystins, Dissolved oxygen saturation, pH, Non-native aquatic plants, Total phosphorus (TMDL)*

*NHLAK700061203-06-02 Robinson Pond - Town Beach: Cyanobacteria hepatotoxic microcystins, E. coli (TMDL)*

*NHLAK700061206-02 Otternick Pond: Non-native aquatic plants*

*NHRIV700061002-14 Merrimack River: pH, Creosote, E. coli (TMDL)*

*NHRIV700061203-21 Beaver Brook: pH*

*NHRIV700061203-22 Beaver Brook: Benthic-Macroinvertebrate Bioassessments, E. coli (TMDL)*

*NHRIV700061203-25 Howard Brook: Escherichia coli, pH*

*NHRIV700061203-35 Robinson Pond - Beach Brook: pH*

*NHRIV700061203-37 Juniper Brook: pH*

*NHRIV700061206-01 Glover Brook: pH*

*NHRIV700061206-04 Merrill Brook - Unnamed Brook: pH*

*NHRIV700061206-05 First Brook: pH*

*NHRIV700061206-10 Second Brook: pH*

*NHRIV700061206-24 Merrimack River: Aluminum, Chlorophyll-a, E. coli (TMDL), pH*

*Impairments included in the NOI and no longer current as of the 2024 305(b)/303(d) list include:*

*NHLAK700061206-02 Otternick Pond: pH*

## Part IV: Minimum Control Measures

Please fill out all of the metrics below. If applicable, include in the description who completed the task if completed by a third party.

### MCM1: Public Education

Number of educational messages completed **during this reporting period:**

Below, report on the educational messages completed **during this reporting period**. For the measurable goal(s) please describe the method/measures used to assess the overall effectiveness of the educational program.

#### **BMP:1-1 Pet Waste Clean-up and Disposal**

Message Description and Distribution Method:

*The Town Clerk's office distributes pet waste cards developed by the Piscataqua Region Estuaries Partnership during the dog licensing period and posted pet waste flyer's at various locations in Town to encourage residents to clean up and properly dispose of pet waste.*

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

*Reduce the number of incidences where dog waste is left on the ground in commonly used dog walking locations.*

Message Date(s):

Message Completed for: Appendix F Requirements  Appendix H Requirements

Was this message different than what was proposed in your NOI? Yes  No

If yes, describe why the change was made:

#### **BMP:1-2 Grass Clippings & Fertilizer Messages**

Message Description and Distribution Method:

*The Town distributes an educational postcard produced by the UNH Cooperative Extension promoting proper turf maintenance protocols, grass clipping disposal, and methods to reduce fertilizer usage at Town Hall and DPW building*

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

*Increase awareness on ways to maintain lawns using less fertilizer and properly dispose lawn waste*

Message Date(s): *Ongoing*

Message Completed for: Appendix F Requirements  Appendix H Requirements

Was this message different than what was proposed in your NOI? Yes  No

If yes, describe why the change was made:

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### **BMP:1-3 Septic Tank Maintenance & Pumping**

Message Description and Distribution Method:

*The Town printed and posted a "Get Pumped" brochure developed by NHDES to promote septic system pumping and increased maintenance. The brochure is distributed at the Town Hall and DPW buildings.*

Targeted Audience: *Residents*

Responsible Department/Parties: *Engineering/ Conservation Commission*

Measurable Goal(s):

*Increase awareness and encourage residents to pump and maintain their septic systems.*

Message Date(s): *Ongoing*

Message Completed for: Appendix F Requirements  Appendix H Requirements

Was this message different than what was proposed in your NOI? Yes  No

If yes, describe why the change was made:

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### **BMP:1-4 Yard Waste & Leaf Litter**

Message Description and Distribution Method:

*The Town printed and distributed brochures highlighting the curbside leaf litter pickup in the fall and provided information for leaf litter disposal at the transfer station.*

Targeted Audience: *Residents/ Businesses*

Responsible Department/Parties: *Engineering/ DPW Operations*

Measurable Goal(s):

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*Increase the quantity of leaf litter delivered to the transfer station.*

Message Date(s): *Ongoing*

Message Completed for: Appendix F Requirements  Appendix H Requirements

Was this message different than what was proposed in your NOI? Yes  No

If yes, describe why the change was made:

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*Add an Educational Message*

## **MCM2: Public Participation**

Describe the opportunity provided for public involvement in the development of the Stormwater Management Program (SWMP) **during this reporting period:**

*The Town's SWMP, related stormwater reports, and other relevant information is posted on the Town's website. The Conservation Commission regularly hosts meetings open to the public to discuss items relevant to the Town's MS4 stormwater management program. In addition, the Town's SWMP is publicly available on the Town's website year-round for public use and comment.*

Was this opportunity different than what was proposed in your NOI? Yes  No

Describe any other public involvement or participation opportunities conducted **during this reporting period:**

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## **MCM3: Illicit Discharge Detection and Elimination (IDDE)**

### **Sanitary Sewer Overflows (SSOs)**

*Check off the box below if the statement is true.*

This SSO section is NOT applicable because we DO NOT have sanitary sewer

Below, report on the number of SSOs identified in the MS4 system and removed **during this reporting period.**

Number of SSOs identified:

Number of SSOs removed:

### **MS4 System Mapping**

Percent of Phase II map complete:

*Optional:* Provide additional status information regarding your map:

*The Town is actively working to refine catchment delineations.*

### **Screening of Outfalls/Interconnections**

*If conducted, please submit any outfall monitoring results from this reporting period. Outfall monitoring results should include the date, outfall/interconnection identifier, location, weather conditions at time of sampling, precipitation in previous 48 hours, field screening parameter results, and results from all analyses. Please also include the updated inventory and ranking of outfalls/interconnections based on monitoring results.*

- No outfalls were inspected
- The outfall screening data is attached to the email submission
- The outfall screening data can be found at the following publicly available website:

Below, report on the number of outfalls/interconnections screened **during this reporting period.**

Number of outfalls screened:

Below, report on the percent of total outfalls/ interconnections screened **to date.**

Percent of outfalls screened:

*Optional:* Provide additional information regarding your outfall/interconnection screening:

*Through annual GIS mapping and outfall screening efforts, the Town identified additional Town-owned outfalls which may be subject to MS4 requirements, as well as some outfalls which had been identified as public but are actually privately owned. This led to an increase in the overall number of outfalls which may be subject to MS4 requirements. The Town continues to screen the outfalls as staff and funding allows.*

### **Catchment Investigations**

*If conducted, please submit all data collected during this reporting period as part of the dry and wet weather investigations. Also include the presence or absence of System Vulnerability Factors for each catchment.*

- No catchment investigations were conducted
- The catchment investigation data is attached to the email submission
- The catchment investigation data can be found at the following publicly available website:

Below, report on the number of catchment investigations completed **during this reporting period.**

Number of catchment investigations completed this reporting period:

Below, report on the percent of catchments investigated **to date**.

Percent of total catchments investigated:

*Optional:* Provide any additional information for clarity regarding the catchment investigations below:

*Catchment investigations were initiated in Year 6. The Town is developing an annual workload schedule to plan catchment investigations through Year 10.*

### **IDDE Progress**

*If illicit discharges were found, please submit a document describing work conducted over this reporting period, and cumulative to date, including location source; description of the discharge; method of discovery; date of discovery; and date of elimination, mitigation, or enforcement OR planned corrective measures and schedule of removal.*

- No illicit discharges were found
- The illicit discharge removal report is attached to the email submission
- The illicit discharge removal report can be found at the following publicly available website:

Below, report on the number of illicit discharges identified and removed, along with the volume of sewage removed **during this reporting period**.

Number of illicit discharges identified:

Number of illicit discharges removed:

Estimated volume of sewage removed:  gallons/day

Below, report on the total number of illicit discharges identified and removed to date. At a minimum, report on the number of illicit discharges identified and removed **since the effective date of the permit (July 1, 2018)**.

Total number of illicit discharges identified:

Total number of illicit discharges removed:

*Optional:* Provide any additional information for clarity regarding illicit discharges identified, removed, or planned to be removed below:

### **Employee Training**

Describe the frequency and type of employee training conducted **during this reporting period**:

*The Town's MS4 consultant performed an annual training with Engineering Department and Department of Public Works staff in June 2025. The training covered recognizing illicit discharges & SSOs (MCM3), operations & maintenance programs (MCM3), and municipal facility SWPPP maintenance and inspection requirements (MCM3).*

### **MCM4: Construction Site Stormwater Runoff Control**

*Below, report on the construction site plan reviews, inspections, and enforcement actions completed **during this reporting period.***

Number of site plan reviews completed:

Number of inspections completed:

Number of enforcement actions taken:

*Optional:* Enter any additional information relevant to construction site plan reviews, inspections, and enforcement actions:

### **MCM5: Post-Construction Stormwater Management in New Development and Redevelopment**

#### **As-built Drawings**

*Below, report on the number of as-built drawings received **during this reporting period.***

Number of as-built drawings received:

*Optional:* Enter any additional information relevant to the submission of as-built drawings:

#### **Street Design and Parking Lots Report**

Below, describe any changes made or planned to be made to local regulations and guidelines based on the report completed in Year 4:

*An assessment of the Town's street and parking design requirements was completed in Year 4. Although the current requirements were generally found to be consistent with the MS4 requirements and those in other communities, the Town updated their design requirements in May 2022.*

## **Green Infrastructure Report**

Below, describe progress towards making green infrastructure practices allowable based on the report completed in Year 4:

*An assessment of the Town's regulations to allow and/or encourage the use of green infrastructure in site design was completed in Year 4. The regulations generally allow and encourage the use of LID and green infrastructure both in the regulations and design guidelines. No regulation changes were proposed as a result of the assessment.*

## **Retrofit Properties Inventory**

Below, list remaining permittee-owned properties that could be modified or retrofitted with BMPs to mitigate impervious areas:

*Robinson Pond Beach  
Robinson Pond Boat Launch  
Bensen Park  
Hazelwood Avenue  
Parker Drive / Kienia Road*

Below, list all properties that have been modified or retrofitted with BMPs to mitigate impervious area that were inventoried as part of 2.3.6.e of the permit and the type of BMP(s) implemented. Non-MS4 owned properties that have been modified or retrofitted with BMPs to mitigate impervious area may also be listed, but must be indicated as non-MS4.

*Hudson Police Department: building expansion and parking improvements included the addition of a new bioretention basin in 2023*

## **MCM6: Good Housekeeping**

### **Catch Basin Cleaning**

Below, report on the number of catch basins inspected and cleaned, along with the total volume of material removed from the catch basins **during this reporting period**.

Number of catch basins inspected:

Number of catch basins cleaned:

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

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

Total number of catch basins:

*If applicable:*

Report on the actions taken if a catch basin sump is more than 50% full during two consecutive routine inspections/cleaning events:

*If over 50% full, catch basins are cleaned with a vacuum truck.*

### **Street Sweeping**

Report on the number of miles swept **during this reporting period** below.

Number of miles cleaned:

Report either the volume or weight of street sweeping materials collected **during this reporting period** below.

- Volume of material removed:  [Select Units]
- Weight of material removed:

### **Stormwater Pollution Prevention Plan (SWPPP)**

Below, report on the number of site inspections for facilities that require a SWPPP completed **during this reporting period**.

Number of site inspections completed:

Describe any corrective actions taken at a facility with a SWPPP:

*No corrective actions required.*

## **Additional Information**

### **Monitoring or Study Results**

Results from any other stormwater or receiving water quality monitoring or studies conducted during the reporting period not otherwise mentioned above, where the data is being used to inform permit compliance or permit effectiveness must be attached.

- Not applicable
- The results from additional reports or studies are attached to the email submission
- The results from additional reports or studies can be found at the following website(s):

If such monitoring or studies were conducted on your behalf or if monitoring or studies conducted by other entities were reported to you, a brief description of the type of information gathered or received shall be described below:

**Additional Information**

Enter any additional information relevant to your stormwater management program implementation during the reporting period. Include any BMP modifications made by the MS4 if not already discussed above.

*In 2025 Town received a Clean Water SRF / ARPA grant from NHDES to develop a Stormwater Asset Management Plan for a portion of the Town. The project is currently underway and expected to conclude no later than 2028.*

*As mentioned above, the Nashua Regional Planning Commission (NRPC) had applied for an EPA 604(b) watershed planning grant from NHDES to support the Town's development of a nine-element watershed management plan and investigation of internal phosphorus loading in Robinson Pond. The NRPC application was ranked fourth out of seven applications, and only the top three highest ranked applications were selected for award. NHDES has delayed the release of the 2026 request for pre-proposals under the 604(b) and 319 grant programs until NHDES has more certainty in the grant award from EPA. The Town is eager for funding to become available through this program to allow the Town to pursue this investigation and adequately plan for stormwater and nutrient pollution controls in the Robinson Pond watershed.*

**Year 8****Activities Planned for Next Reporting Period**

Please confirm that your SWMP has been, or will be, updated to comply with all applicable permit requirements including but not limited to the year 8 requirements summarized below. (Note: impaired waters and TMDL requirements are not listed below)

Yes, I agree

**Annual Requirements**

- Annual report submitted and available to the public
- Annual opportunity for public participation in review and implementation of SWMP
- Keep records relating to the permit available for 5 years and make available to the public
- Properly store and dispose of catch basin cleanings and street sweepings so they do not discharge to receiving waters
- Annual training to employees involved in IDDE program
- Update inventory of all known locations where SSOs have discharged to the MS4
- Continue public education and outreach program
- Update outfall and interconnection inventory and priority ranking and include data collected in connection with the dry weather screening and other relevant inspections conducted
- Implement IDDE program
- Review site plans of construction sites as part of the construction stormwater runoff control program
- Conduct site inspection of construction sites as necessary
- Inspect and maintain stormwater treatment structures

- Log catch basins cleaned or inspected
- Sweep all curbed streets at least annually
- Continue investigations of catchments associated with Problem Outfalls
- Implemented SWPPPs for all permittee owned or operated maintenance garages, public works yards, transfer stations, and other waste handling facilities
- Review inventory of all permittee owned facilities in the categories of parks and open space, buildings and facilities, and vehicles and equipment; update if necessary
- Review O&M programs for all permittee owned facilities; update if necessary
- Implement all maintenance procedures for permittee owned facilities in accordance with O&M programs
- Implement program for MS4 infrastructure maintenance to reduce the discharge of pollutants
- Enclose all road salt storage piles or facilities and implemented winter road maintenance procedures to minimize the use of road salt
- Review as-built drawings for new and redevelopment to ensure compliance with post construction bylaws, regulations, or regulatory mechanism consistent with permit requirements
- Inspect all permittee owned treatment structures (excluding catch basins)
- Identify additional permittee-owned properties that could potentially be modified or retrofitted with BMPs to reduce impervious areas so that the permittee maintains a minimum of 5 sites in their

Provide any additional details on activities planned for permit year 8 below:

## Part V: Certification of Small MS4 Annual Report 2025

### 40 CFR 144.32(d) Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, I certify that the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Name:

ROY E. SORWSON

Title:

TOWN ADMINISTRATOR

Signature:



Date:

9/20/25

*[Signatory may be a duly authorized representative]*