

**New Hampshire Small MS4 General Permit
Annual Report**

Merrimack, NH

Permit Year 3

July 1, 2020 through June 30, 2021

EPA NPDES Permit Number NHR041018

Certification

Authorized Representative:

The authorization letter is:

Attached to this document (document name listed below):

210910 - Merrimack NH Authorization Signed.PDF (See attachment 1)

Publicly available at the website:

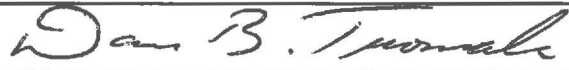
Pending

"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."

Printed Name

Dawn B. Tuomala

Signature



Date

9/28/2021

Primary MS4 Program Manager Contact Information:

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Small MS4 Authorization

The following annual report, which serves as a self-assessment, is intended to document the activities undertaken over the **reporting period from July 1, 2020 through June 30, 2021** in accordance with the Permit. The Notice of Intent (NOI) can be found at the following (document name or web address):

<https://www.epa.gov/npdes-permits/regulated-ms4-new-hampshire-communities>

Compliance activities have been identified and described in the Merrimack Stormwater Management Plan (SWMP) and Illicit Discharge Detection and Elimination Plan (IDDE). The SWMP document can be found at the following website and will be referred to throughout this report:

SWMP: https://www.merrimacknh.gov/sites/g/files/vyhlf3456/f/uploads/1._swmp.pdf

Copies of the draft IDDE plan are available at the Public Works Administration office located at town hall for review.

IDDE: Draft - pending final Town Council approval

The draft IDDE plan is available for review at the Public Works Administration office and will be put online when the Public comments period opens. The process has taken longer than expected due to Covid-19 meeting requirements. There are several code changes that will need to be changed and each change will require three (3) meetings to be approved. The changes will enhance the codes we already have in place. The codes have always been working for us in the past in town. IDDE's are not and have not been allowed. Each one has been dealt with as needed as it has occurred to resolve the issue.

MCM1 - Public Education and Outreach

Year 3 Activities

BMP: Grass and Fertilizer

Document Name and/or Web Address:

Merrimack specific flyer – “Green Grass & Clear Water”:

https://www.merrimacknh.gov/sites/g/files/vyhlf3456/f/uploads/green_glass_clear_water.pdf

Description:

Distribution and promotion of “Green Grass & Clear Water” produced by UNH Cooperative Extension and NH Sea Grant with minor modifications made by the Town of Merrimack, outlining simple recommendations to keep lawns healthy while reducing water quality impacts - including proper fertilizer techniques and disposal of grass clippings and are made aware of proper lawn care management techniques for reducing those impacts.

Targeted Audience:

Residential

Businesses, Commercial and Institutions

Developer/Construction

Industrial

Measurable Goal(s):

Lawn care enthusiast, residents and professionals, need to be made aware of the potential water quality impacts from fertilizer and improper disposal of grass clippings. Measurement includes quantity of materials distributed and website views.

Flyers are available at Town buildings and facilities and available to view on the town’s website.

The Environmental Coordinator position filled in early 2021 is working on procedures to track distribution methods and website views.

Goal was achieved.

Message Date:

Year round; fliers are available at Town buildings and facilities and can be viewed on the Towns website.

Typically fliers are distributed at Town events during the summer and fall last year. This year due to Covid-19, town events were cancelled.

BMP: Pet Waste Disposal

Document Name and/or Web Address:

Merrimack specific Flyer – “I Poop You Scoop”:

https://www.merrimacknh.gov/sites/g/files/vyhlf3456/f/uploads/dog_waste_brochure.pdf

Merrimack infomercial:

Merrimack specific infomercial – “Bag it Then Trash It” Pet waste and storm water

<https://www.youtube.com/watch?v=2K5RMVGmUPg>

Description:

Distribution and promotion of "I Poop You Scoop" flyer and the infomercial “Bag it Then Trash It” created by the Town of Merrimack outlining proper pet waste management, impacts of improper management, pet waste ordinance, and disposal requirements messaging.

Targeted Audience:

Residential - Pet Owners

Measurable Goal(s):

Measurement includes quantity of materials distributed, infomercial and website views.

The Town Clerk sent out 4,000 fliers to those residents who registered their dogs.

The flyer is posted at the various trail head kiosks and added to the posted park/trail rules.

A link to view the flyer is on the town’s website.

The Merrimack produced infomercial was played 125 times on the local television station and viewed 149 times on social media.

Goal was achieved.

Message Date:

Year round, fliers are available at Town buildings and facilities and can be viewed on the Towns website. Flyers are distributed at the time of dog registration. The infomercial is periodically play on the Town’s television station throughout the year.

BMP: Disposal of Leaf and Grass Clippings

Document Name and Web Address:

Merrimack specific Flyer – “Rake it or leave it”:

https://www.merrimacknh.gov/sites/g/files/vyhlf3456/f/uploads/yard_waste.pdf

Merrimack infomercial and Web Address:

The Town of Merrimack has produced an infomercial that is periodically played on the Town’s television station and is available to view on the Town’s website and social media. The video can be viewed at the following website:

<https://www.youtube.com/watch?v=VDSu5rEGB6Q>

Description:

Distribution and promotion of the “Rake it or leave it” flyer produced by NH Department of Environmental Services with minor modifications made by the Town of Merrimack and the infomercial produced by the Town of Merrimack, with messaging about impacts from yard waste to waterbodies, alternatives to dumping yard waste and laws against dumping yard waste near or in waterbodies.

Targeted Audience:

Residential

Businesses, Commercial and Institutions

Measurable Goal(s):

Measurement includes quantity of materials distributed, infomercial and website views.

Flyers are available at Town buildings and facilities and available to view on the town’s website.

The Environmental Coordinator position filled in early 2021 is working on procedures to track distribution methods and website views.

Goal was achieved.

Message Date:

Year round, fliers are available at Town buildings and facilities and can be viewed on the Towns website. Typically fliers are distributed at Town events during the summer and fall last year. This year due to Covid-19, town events were cancelled.

BMP: Septic System Maintenance

Document Name and/or Web Address:

Merrimack specific Flyer – “Get pumped” brochure / flyer:

https://www.merrimacknh.gov/sites/g/files/vyhlf3456/f/uploads/ge_pumped_community_brochure.pdf

Social media posts – EPS Septic Smart Week - September 14-18, 2020.:

Provided a Facebook link to NHDES website promoting the EPA’s Septic Smart Week which included links EPA septic related websites and NHDES “Get Pumped NH” website.

Description:

Distributed and promoted brochure “Get pumped” created by the Town of Merrimack and a social media link to “Get Pumped NH” with messaging about how a septic system works, maintenance requirements and impacts to waterbodies as a result of no maintenance.

Targeted Audience:

Residential

Businesses, commercial and Institutions

Measurable Goal(s):

Measurement includes quantity of materials distributed

Flyers are available at Town buildings and facilities and available to view on the town’s website. Flyers are also distributed to the septic haulers for their direct distribution to their Merrimack customers.

When a septic hauler comes to the Merrimack Wastewater Division to dispose of a load, they are tracked on the septic tanks pumps that were located in Merrimack. The goal is to determine if a residence might be having an issue with their septic system by tracking the number of times per year they have to pump their system. The more pumping requirements might indicate that a leachfield is going into failure. 41 parcels were noted to have been pumped 2 or more times during year 3. The Environmental Coordinator position filled in early 2021 is working on procedures to track distribution methods and website views.

Goal was achieved.

Message Date:

Year round, fliers are available at Town buildings and facilities and can be viewed on the Towns website. Typically fliers are distributed at Town events during the summer and fall last year. This year due to Covid-19, town events were cancelled.

BMP: Industrial Outreach

Document Name and/or Web Address:

Merrimack specific brochure / flyer – “Stormwater information for Businesses”

https://www.merrimacknh.gov/sites/g/files/vyhlf3456/f/uploads/stormwater_business.pdf

Description:

Distributed and promoted brochure “Stormwater information for Businesses” created by the Town of Merrimack with messaging lawn and building maintenance, parking lot management, ice prevention, material storage and dumpster waste management.

Targeted Audience:

Businesses, commercial and Institutions
Industrial Facilities

Measurable Goal(s):

Measurement includes quantity of materials distributed.

Flyers are available at Town buildings and facilities and available to view on the town’s website. The Environmental Coordinator position filled in early 2021 is working on procedures to track distribution methods. In the future the information will be handed out at the pre-construction and post-construction meetings where applicable.

Goal was achieved.

Message Date:

Year round, fliers are available at Town buildings and facilities and can be viewed on the Towns website. Typically fliers are distributed at Town events during the summer and fall last year. This year due to Covid-19, town events were cancelled.

Merrimack is actively in the process of distributing an outreach letter and stormwater fact sheet to industrial facilities located within municipal boundaries to explain best management practices related to maintenance of parking lots, spill prevention, storage of industrial materials, and winter maintenance. Industrial facility operators were also made aware that they fall under the EPA Multi-Sector General Permit (MSGP) and must meet those requirements as well. It is our intent to distribute this information prior to winter maintenance activities to stress the importance of de-icing management. We are also updating the website brochure links for the ability to track the number of views.

BMP: Developer/Construction Outreach

Description:

Review checklists with developers and construction contractors prior to beginning of construction project (pre-construction) to identify responsible parties, erosions control practices, other best management practices, and requirements for EPA Construction General Permit as appropriate.

A flyer was created in June to provide to commercial businesses and industrial properties to help them with their future maintenance of their properties, see below:

https://www.merrimacknh.gov/sites/g/files/vyhlf3456/f/uploads/stormwater_business.pdf

Targeted Audience:

Businesses, commercial and Institutions

Developer/Construction

Measurable Goal(s):

Contractors and Developers are aware of the need for proper erosion control practices during construction work.

The Town of Merrimack has been conducting pre-construction meetings for any construction project that disturbs over 20,000 square feet of land disturbance. Many of the various Town Departments are represented at these meetings. Department representatives come from Fire, Police, Building, Community Development; Public Works (Administration, Highway and Sewer). Each department brings their own standards, expertise and check lists to the meeting.

During the meeting the owner, developer and contractor are presented with a copy of Code Chapter 167 for construction and the review of stormwater plans. At the end of the meeting everyone is required to sign that they were given this information and it was discussed and understood.

The Town requires storm water erosion control reports be given to Community Development at least weekly and if there is a quarter of an inch of rain or more on any active construction site. There were 6 new Pre-Construction meetings representing 100% of projects that had received planning board approval and were actually ready to begin construction during this reporting period.

Goal was achieved.

Message Date:

Ongoing. Meetings are required within 2 weeks prior to construction beginning on any project that exceeds 20,000 square feet of disturbance.

MCM2 - Public Participation

BMP: Public Participation in Stormwater Management Program Development

Description:

The Stormwater Management Program was publicly reviewed at a Town Council Meeting on June 24, 2021. The Town Councilors and the public were given the opportunity to ask questions on the plan. A letter was also prepared to the Town Manager to go into their records.

The meeting minutes from the Town council meeting can be viewed at the following link:

https://www.merrimacknh.gov/sites/g/files/vyhlf3456/f/minutes/tcm_210624_-_final.pdf

Documents and records relating to the permit are retained at the Public Works Administration office located at town hall with the previous 5 years available for the public to view.

Measurable Goal(s):

Input was received and records are maintained.

Goal was achieved.

Message Date:

Due to Covid-19 the Town's other public participation events were cancelled for the year. They will resume when conditions permit and the public feels comfortable participating again.

BMP: Public Participation in Household Hazardous Waste (HHW) Program

Description:

The Town of Merrimack participates in the Nashua Region Solid Waste Management Districts (NRSWMD) Household Hazardous Waste Program. This is a program funded by municipal assessments, user fees and a grant received by the Nashua Regional Planning Commission from the NH Department of Environmental Services

Measurable Goal(s):

Participation from residents of Merrimack

The Merrimack Annual report note that 132 households participated in the HHW collection event.

Goal was achieved.

Message Date:

Typically six (6) events are held during the summer and fall.

BMP: Adopt-a-Road/Spot

Description:

Adopt-a-Road allows individuals, organizations, or business to “adopt” all or parts of Town roads for the purpose of litter pick up. Sponsors are asked to perform their roadside litter clean-up every spring and fall.

Measurable Goal(s):

Number of participants

The Merrimack Annual report note that there are 27 participants.

Goal was achieved.

Message Date:

Year round open sponsorship

BMP: Eversource (Power Company) and New Hampshire saves – Freon event

Description:

Through a partnership with Eversource (Power Company) and New Hampshire Saves, Merrimack was able to offer resident’s free disposal of Freon based appliances (refrigerators, air conditioners, dehumidifiers and freezers). Eversource (Power Company) covered the cost (\$4,020) in disposal fees for the items.

Measurable Goal(s):

Number of appliances collected

The Merrimack Annual report note that there are 268 Freon appliances collected.

Goal was achieved.

Message Date:

October 17, 2020

MCM3 – Illicit Discharge Detection and Elimination

BMP: IDDE Legal Authority

The municipality has established legal authority under Administrative Code Chapter A198. The revised ordinance is in draft form pending minor edits and final review by the Town Attorney and final approval by Town Council.

To comply with the EPA NPDES program, authority and responsibility in existing statutes have been used. New Hampshire DES Bureau programs such as; Alteration of Terrain, Wetland, Shoreland, clearly have the authorization to establish water pollution control and promote pollution prevention. Coupling this authority with an appointed Health Officers authority to investigate and enforce public health hazards, The Town of Merrimack has been implementing the (IDDE) program in accordance with the EPA MS4 Permit Section 2.3.4.

Authority:

State statutes and local code providing guidance for implementation and enforcement of the IDDE Program;

- a. RSA 21-O, Which established the New Hampshire Department of Environmental Services (NHDES) to promote pollution prevention actions in all sectors of the State.
- b. RSA 128, Which authorize the Department of Health and Human Services (DHHS) to appoint a Health Officer for each Town of New Hampshire.
- c. Town Code A198-12 Fire and Rescue Department, Which authorizes the Health Officer to investigate complaints and enforce State and Local sanitary laws and ordinances.

The draft IDDE procedure has been implemented and has identified and corrected one illicit discharge proving the program's effectiveness The Fire and Rescue Department responded to several hazardous material spills that were successfully addressed.

BMP: Sanitary Sewer Overflow (SSO) Inventory

Number of SSO's identified this year: Zero SSO's identified

Number of SSO's removed this year: Zero SSO's removed

BMP: Map of Storm Sewer System

The transition between paper plans and inspection forms to the internal GIS system has continued throughout the year. Due to security reasons the utilities are not available to the general public. Copies can be provided upon request to the Department of Public Works. Corrections and additions to the map will continually be updated in the future.

BMP: IDDE Program (Screening Outfalls/Interconn., Catchment Investigations, and IDDE Progress)

All outfalls and interconnections (excluding problem and excluded outfalls) were inspected and screened. Outfall catchments and interconnections priority ranking were updated based on the information collected during the dry weather inspections (See attachment 2). A draft written IDDE plan has been developed and written catchment investigation procedures are included.

Outfall identification, characterization and prioritization information has been updated and included in the draft IDDE plan based on dry weather sampling.

The following tasks have been completed in accordance with the permit. Dry weather outfall screenings and sample information included (see attachment 3).

Number of dry weather outfall investigations/screenings: 76 outfall investigations

Number of dry weather samples taken: 11 samples, one outfall sampled twice.

Number of wet weather outfall inspections/sampling events: zero inspection/samples

Number of wet weather samples taken: zero wet weather samples taken

Number of catchment investigations: One catchment investigation (Harris Ave). This investigation is still ongoing into year 4.

Number of illicit discharges: One illicit discharge identified (Pearson Rd)

Number of illicit discharges removed: One illicit discharge removed (Pearson Rd)

Estimated gallons of flow removed: approximately 500 gallons

One Illicit discharge was found and is submitted with this report (see attachment 4). The details of the discharges including the location source, description of discharge, method of discovery, date of discovery, and date of elimination, mitigation, and enforcement OR the planned corrective measures and schedule of removal are included in the report.

BMP: Employee Training

Merrimack staff were trained using IDDE training videos created by UNH, the City of Dover, and NHDES. Video topics included collecting data and water samples in the field, and analyzing for pertinent parameters as identified in the permit. A video addressing the issues associated with stormwater, common pollutants of concern, how to identify an illicit discharge, and general IDDE sampling protocols is being prepared by NHDES. The video is estimated to be finalized and available to permittees in late 2021. Training logs are included in Appendix F of the IDDE report.

In addition, as a routine, IDDE materials and training, including information on how to identify illicit discharges and SSOs are made available to applicable employees in accordance with IDDE plan.

The Town of Merrimack has always encouraged the Town employees to attend classes. The Public Works Employees attend classes specifically targeted for public works through the University of New Hampshire Technology Transfer Center (T2) Road Scholars Program. The program offers a wide variety of classes including safety, drainage and erosion control along with salt usage topics.

These classes have been curtailed due to the impacts of the Covid-19 meeting size limitations.

MCM4 – Construction Site Stormwater Runoff Control

A written site inspection and enforcement program for erosion and sediment control measures was created and is included in our SWMP. The Town of Merrimack has an existing Construction Site Stormwater Runoff Control Ordinance that is presently part of Town Code 167 (Adopted July, 2011 and amended December, 2017). The Ordinance will be reviewed and updated as needed when the IDDE is added to the ordinance.

Site Plan Regulations were adopted in September 2019 and have incorporated many more provisions for drainage including Low Impact Development and Water Quality Measures. The Subdivision Regulations and Construction Standards are currently undergoing the reviews and will be updated when time, the ability to meet and finances allow.

The following tasks are in progress in accordance with the permit.

Number of site plan reviews completed: 14 site plan review completed

These are reviews that were given final approved and signed during the year. The planning process might have begun the year before for some of them. There are projects that were given conditional approval but until they are given final approval and signed they are not included in the numbers.

Number of inspections: 379 stormwater site inspections

The Town of Merrimack requires any project over 20,000 square feet of disturbance provide a weekly and after a ¼" rain event SWPPP report. The reports are to be supplied by a third party for any site that is currently under construction. The reports also follow the State of NH DES Stormwater Manual requirements. Substantial growth is required before the reports are allowed to stop.

In addition, Public Works Department performs daily, semi-weekly or weekly inspections on all projects that impacts the Town Right of Way depending upon what work is being conducted. All road construction projects are monitored daily for erosion control measures.

Number of enforcement actions: Zero enforcement actions

If any issues are evident during a visit the contractor is notified immediately. Corrections are generally made as soon as possible after the request is made. If the contractor is not on site, an email is sent to the contractor and the owner outlining the issues. Violations have not resulted in any enforcement actions during the past year. Issues were immediately addressed and resolved as requested.

MCM5 – Post Construction Stormwater Management in New Development and Redevelopment

BMP: Post-Construction Ordinance (due in year 3)

A Post-Construction Ordinance has been in place within Chapter 167, links and references are included in our SWMP and the link provided below. Site Plan Regulations also references the Post Construction Stormwater requirements.

https://www.merrimacknh.gov/sites/g/files/vyhlf3456/f/file/file/stormwater_ord_chapt_167.pdf

BMP: As-built Drawings

A program to address post-construction stormwater runoff from all new development and redevelopment projects has been developed and implemented, and includes projects that disturb a minimum of 20,000 SF. The purpose of Stormwater Management Standards is to provide reasonable guidance for the regulation of stormwater runoff, during planning, design, construction and post-construction phases, to protect local natural resources from degradation and prevent adverse impacts to adjacent and downstream land, property, facilities and infrastructure. These standards regulate discharges from stormwater and runoff from land development projects and other construction activities to control and minimize increases in stormwater runoff rates and volumes, soil erosion, stream channel erosion, and nonpoint source pollution associated with stormwater runoff. The Stormwater Management Standards apply to any development or redevelopment projects which are subject to Site Plan Review or Subdivision approval that disturb more than 20,000 square feet. The applicant shall submit as-built drawings of the constructed stormwater management system to the Community Development Department following construction. As-built drawings are required prior to surety bond release, final road and utility acceptance and post construction meeting.

Number of as-built drawings received: 3 as-built drawing received

BMP: Long-term Operation and Maintenance Procedures

Chapter 167, Stormwater Management Standards have been adopted and addresses long-term post-construction stormwater runoff from all new development and redevelopment projects which that disturb a minimum of 20,000 SF. Submission requirements for stormwater management reports and plans are included in local regulations and can be found at the Community Development Department located at Town Hall and:

https://www.merrimacknh.gov/sites/g/files/vyhlf3456/f/file/file/stormwater_ord_chapt_167.pdf

In an effort to standardize the long-term O&M and inspection submission requirements across all New Hampshire MS4 communities, as well as standardize any non-compliance actions taken by the municipality, the Seacoast Stormwater Coalition is in the process of working with a selected engineering group (VHB) to develop standardized resources, guidance and an inspection template that towns and municipalities can use to better promote, track and enforce the implementation of best management practices for privately-owned parking areas and drainage infrastructure. These are anticipated to be available for review in late 2021.

BMP: Street Design and Parking Lot Guidance Report (due in year 4)

Deliverables will progress in accordance with the permit and is scheduled for year 4.

BMP: Green Infrastructure Report (due in year 4)

Deliverables will progress in accordance with the permit and is scheduled for year 4.

BMP: List of Municipal Retrofit Opportunities (due in year 4)

Deliverables will progress in accordance with the permit and is scheduled for year 4.

MCM6 – Good Housekeeping and Pollution Prevention for Permittee Owned Operations

BMP: Catch Basin Cleaning Program

A schedule for catch basin cleaning has been established with the goal of ensuring that a catch basin should not be more than 50% full. Catch basin cleanings were properly stored and disposed of so that they did not discharge to receiving waters. This is detailed in the SWMP.

The following tasks are in progress in accordance with the permit.

Number of catch basins within MS4 regulated area: 3,500 catch basins

Number catch basins inspected in accordance with the SWMP: 216 catch basins inspected

Number of catch basins cleaned: 149 catch basins cleaned

Total mass of material removed: 90 tons of material removed

BMP: Street Sweeping Program

A street sweeping program has been established such that all streets with curbing and/or catch basins and permittee-owned parking lots are swept in accordance with permit conditions. Street sweepings were properly stored and disposed so that they did not discharge to receiving waters.

The following tasks are in progress in accordance with the permit.

Number of (lane) miles swept: 360 lane miles

Mass of swept material: 3,141 tons

BMP: Winter Road Maintenance Program

A winter road maintenance program has been established with a goal of reducing salt usage. Salt reduction strategies have been implemented as outlined in our SWMP. Work is continuing on updating both the road and ice maintenance policy (from 1999) and the reduced salt policy (from 1984) within the Town of Merrimack. Employees are trained under the Green Snow Pro Program.

BMP: Permittee Owned Facilities Inventory

All permittee owned facilities, including inventory, are included in our SWMP. There were no changes to report for Year 3.

BMP: O&M Programs and Procedures for Permittee-Owned Properties

O&M programs for all permittee owned facilities have been completed and are included in our SWMP. All maintenance procedures have been implemented for permittee owned facilities according with O&M programs.

BMP: Permittee Owned Treatment Structures

Merrimack has inspected all permittee owned treatment structures (excluding catch basins)

BMP: SWPPP (due year 3)

SWPPPs were implemented for the following facilities: maintenance garages, public works yards, transfer stations, and other waste handling facilities where pollutants are exposed to stormwater.

Inspections are completed, corrective actions taken, and employees regularly trained as outlined in the SWPPP(s). The SWPPP(s) and associated documentation are located at Public Works Administration Department located at Town Hall.

Number of site inspections for facilities that require a SWPPP completed:
25 town facilities

Number of corrective actions identified:
Zero

Number of corrective actions taken:
Zero

BMP: Stormwater Treatment Structures Inspection and Maintenance Procedures

Merrimack continues to collect information with a goal of inventorying and formally inspecting all municipally owned BMPs. Maintenance is carried out in accordance with the procedures outlined in the SWMP. Any BMPs that are safety or flooding hazards are dealt with as needed.

TMDL's and Water Quality Limited Waters

Bacteria/Pathogens

Outfalls to these receiving waters have been ranked as high priority for the IDDE implementation in the initial outfall ranking and enhanced BMP's have been implemented in accordance with the SWMP.

Phosphorus

Outfalls to these receiving waters have been ranked as high priority for the IDDE implementation in the outfall ranking and enhanced BMP's have been implemented in accordance with the SWMP.

The Town of Merrimack, NH through its participation in the Lower Merrimack Valley Stormwater Coalition and will become involved in the NHDES led Pollutant Tracking and Accounting Program (PTAP), will satisfy the tracking and accounting requirement of the municipally owned structural BMP's listed in Attachment 1 to Appendix H. Public Education and outreach to the residents, commercial and business owners has been a large focus. The development and redevelopment site plan regulations have been updated to improve the discharges. The remaining requirements will be addressed within years 4 and 5 of the permit as required.

Solids, Oil and Grease (Hydrocarbons), or Metals

Outfalls to these receiving waters have been ranked as high priority for the IDDE implementation in the initial outfall ranking and enhanced BMP's have been implemented in accordance with the SWMP. Catch Basin cleaning and Street Sweeping remain a Good Housekeeping and Pollution Prevention for Permittee Owned Operations.

Additional Required Information

Monitoring or Study Results

No additional monitoring or studies were completed.

Description of Any Changes in Identified BMPs or Measurable Goals

Merrimack made changes as noted below to the following BMPs and/or measurable goals that were outlined in the permit and identified in the SWMP.

The Town of Merrimack, NH has made changes as noted below to the following BMPs and/or measurable goals that were outlined in the approved Notice of Intent.

- MCM 1: New outreach infomercial on disposal of leaf and grass clippings. Improved activity tracking methods
- MCM 2: Expand public participation information to include programs that have been run in the town for many years.
- MCM 4: Improved tracking of site plan reviews
Improved tracking of construction inspections
- MCM 5: Initiated and better tracked post construction, meetings, utility plans and as-built submission. Setup program to include requiring owners put this regulation in deeds, covenants, etc. Improved tracking of long-term operation and maintenance inspections
- MCM 6: Completed a draft copy of the Operation and Maintenance manual. Initiated and documented SWPPP inspection of municipal facilities.

Activities for the Next Reporting Cycle

Merrimack will continue to implement activities in accordance with the permit and SWMP.