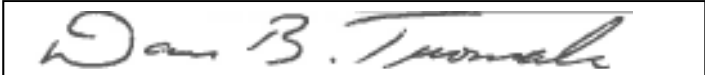


Year 4 Annual Report
New Hampshire Small MS4 General Permit
Reporting Period: July 1, 2021 - June 30, 2022
Merrimack, NH

EPA NPDES Permit Number NHR041018

Certification of Small MS4 Year 4 Annual Report

"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	
Title	Deputy DPW Director / Town Engineer	
Signature		Date
		September 27, 2022

Authorized Representative:

The authorization letter is:

- Attached to this document (document name listed below):

See Attachment 1 – Authorization Letter – Signed PDF

- Publicly available at the website:

N/A Available at the Town Hall Public Works Administration Office

Primary MS4 Program Manager Contact Information:

Name: Dawn B Tuomala, PE, LLS, CWS Title/Position: Deputy DPW Director / Town Engineer

Department: Public Works Administration

Street Address: 6 Baboosic Lake Road

City: Merrimack

State: New Hampshire

Zip Code: 03054

Email: DTuomala@MerrimackNH.Gov

Phone Number: (603) 424-5137

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, 2021 through June 30, 2022** 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’s Stormwater Management Plan (SWMP) and Illicit Discharge Detection and Elimination Plan (IDDE). Those documents and other pertinent Year 4 information can be found in submission or at the following websites, and will be referred to throughout this report:

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

Date SWMP was Last Updated: 2020
(Working on Updating in 2022)

IDDE Program Plan: See **Attachment 2** – IDDE Program Plan (Draft) Scheduled before Town Council in March 2023.

SSO Inventory: **N/A** – No Combined Sewers

Dry Weather Screening Data: **See Attachment 3** – Dry Weather Screening Data 2022

Inventory and Ranking of Outfalls/Interconnections: **See Attachment 4A** - Inventory of Outfall Priority Ranking and **Attachment 4B** – Inventory of Outfalls System Vulnerability Factors

Wet Weather Screening Data: **N/A**

Catchment Investigation Data: **See Attachment 5** – Harris Ave Catchment Investigation Summary

Illicit Discharge Removal Report: **N/A**

Salt Reduction Plan: **N/A**

Nitrogen Source Identification Report: **N/A**

Phosphorus Source Identification Report: **See Attachment 6** – Phosphorus Source Identification Report

Chloride Reduction Plan: **N/A**

Results from additional stormwater or receiving water quality monitoring reports or studies:
N/A

Self-Assessment

Select the impairment(s) and/or TMDL(s) that are applicable to your MS4. Make sure you are referring to the 2018 EPA approved Section 303(d) Impaired Waters List which was used for the Year 4 reporting period and can be found here:

<https://www.des.nh.gov/sites/g/files/ehbemt341/files/documents/2020-01/2018-epa-approval-20200225.pdf>

All **Appendix F and H requirements** can be found under “Appendix F and H: Water Quality Limited Waters & TMDLs” section of this report.

Impairment(s)

- | | | |
|--|--|-----------------------------------|
| <input checked="" type="checkbox"/> Bacteria/Pathogens | <input type="checkbox"/> Chloride | <input type="checkbox"/> Nitrogen |
| <input checked="" type="checkbox"/> Phosphorus | <input checked="" type="checkbox"/> Solids/ Oil/ Grease (Hydrocarbons)/ Metals | |

TMDL(s)

- | | | |
|--|-----------------------------------|--|
| <input checked="" type="checkbox"/> Bacteria and Pathogens | <input type="checkbox"/> Chloride | <input checked="" type="checkbox"/> Lake and Pond Phosphorus |
|--|-----------------------------------|--|

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

Merrimack has made changes to the list of receiving waters, outfalls, or impairments since the last NOI submission. The following impairments and/or TMDLs have been added or delisted:

Water Quality Impaired Waters: **See Attachment 7 – NOI 2018 Comparison to 2012 Receiving Waters Chart**

TMDL: None

Describe progress made on any **incomplete requirements** listed above or optionally provide any additional relevant details, in the box below:

Comparisons were made between the 2012 and the 2018 303D lists, see **Attachment 7**. The items in red have been added. Items in Green were delisted. The items in black were there before, and are still present.

Minimum Control Measures

MCM 1: Public Education

Total number of all MS4 related educational efforts completed *during this reporting period*: 10 educational efforts completed

BMP: Grass and Fertilizer

Outreach Resources:

Merrimack Green Grass & Clear Water Brochure:

https://www.merrimacknh.gov/sites/g/files/vyhlif3456/f/uploads/green_glass_clear_water.pdf

Description:

Distribution and promotion of flyers and social media posts produced by UNH Cooperative Extension, NH Sea Grant, and NHDES outlining simple recommendations to keep lawns healthy while reducing water quality impacts - including proper fertilizer techniques and disposal of grass clippings. Merrimack also held a Lawn Care Workshop presented by NH Sea Grant Extension and Squam Lakes Natural Science Center, NH Department of Environmental Services and UNH Extension Service

Targeted Audience:

Residential and/or Business and Institutions

Responsible Department/ Parties:

Department of Public Works Administration

Measurable Goal(s):

Lawn care enthusiast residents understand the potential water quality impacts from fertilizer and improper disposal of grass clippings and are aware of the proper lawn care management techniques for reducing those impacts. Measurement includes quantity of materials distributed, fertilizing class over zoom, and website views. Flyers are available at Town buildings and facilities and available to view on the town's website.

Following is the number of flyers that were distributed *during this reporting period*:

Year 4 = 17 flyers

Following is the number of impressions the social media posts received *during this reporting period*:

Year 4 = 24 attendees to virtual class

Goal was achieved.

Message Date: Year Round with emphasis in the spring – Continued distribution yearly

BMP: Pet Waste Disposal

Outreach Resources:

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:

Residents - Pet Owners

Responsible Department/ Parties:

Department of Public Works Administration

Measurable Goal(s):

Dog owners and/or dog walkers are aware of the potential water quality impacts from pet waste, local pet waste ordinances, and how to dispose of pet waste properly.

The Town Clerk handed out 4,514 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.

Following is the number of impressions the social media posts received ***during this reporting period:***

Year 4 = 125 views on pet waste disposal infomercial on local television station

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

Outreach Resources:

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. Distribute and promote informational flyer, with messaging about impacts from yard waste to waterbodies, alternatives to dumping yard waste and laws against dumping yard waste near or in waterbodies. There was also a social media post on Department of Public Works Facebook page on 8/12/21 regarding “Rake it or leave it”.

Targeted Audience:

Residential &/or Business and Institutions

Responsible Department/ Parties:

Department of Public Works Administration

Measurable Goal(s):

Residents are aware of the water quality impacts of yard waste dumping near or in water bodies and safe alternatives for yard waste disposal.

Following is the number of social media views that were distributed **during this reporting period**:

Year 4 = 5 social media views on the infomercial

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 past year due to Covid-19, some town events were cancelled.

BMP: Septic System Maintenance

Outreach Resources:

“Get Pumped NH” brochure:

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

“What’s Flushable?” Brochure:

<https://www.des.nh.gov/sites/g/files/ehbemt341/files/documents/whats-flushable-brochure.pdf>

Description:

Distributed and promoted brochure “Get Pumped NH” to educate New Hampshire homeowners with septic systems on how to identify, locate and maintain those systems. Get Pumped NH is a collaborated effort between the New Hampshire Association of Septage Haulers (NHASH) and the New Hampshire Department of Environmental Services (NHDES).

Targeted Audience:

Septic System Owners

Responsible Department/ Parties:

Department of Public Works Administration

Measurable Goal(s):

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. Residents are aware of water quality impacts from septic systems, the importance of maintaining septic systems and how to maintain them.

Following is the number of “What’s flushable?” brochure *during this reporting period*:

Year 4 = 20 of “What’s flushable” brochures were distributed

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, some town events were cancelled.

BMP: Construction/Developers Outreach

Outreach Resources:

Stormwater Information for Business brochure:

<https://www.merrimacknh.gov/stormwater/files/stormwater-for-businesses>

Description:

Provide the Construction General Permit outreach letter and brochure to developers, construction contractors, and other municipal or local organizations to educate them on both the new and updated requirements within the EPA 2022 Construction General Permit.

Targeted Audience:

Construction/ Developers

Responsible Department/ Parties:

Department of Public Works Administration

Measurable Goal(s):

Contractors, developers, and municipal or local organizations are made aware of the updates and changes made to the EPA 2022 Construction General Permit including the requirement that those who wish to be considered a qualified person to conduct inspections must meet EPA training standards. Contractors and developers are also made aware of the need for proper erosion control practices during construction work.

Following is the number of brochures that were distributed to municipal or local organizations ***during this reporting period:***

Year 4 = 7 brochures

Following is the number of outreach letters that were distributed to municipal or local organizations ***during this reporting period:***

Year 4 = 20 outreach letters

Merrimack held 7 pre-construction meetings, representing 28% of projects that received planning board approval and began construction ***during this reporting period. Goal was achieved.***

Message Date: Ongoing.

Describe progress made on any **incomplete requirements** listed above **or** optionally provide any additional relevant details, in the box below:

Please note that not all approved projects require a pre-construction meeting. If there is ground disturbance under 20,000 square feet then a pre-construction meeting is not required. Items like lot line adjustments and administrative approvals do not require pre-construction meetings. In addition some of the projects do not begin until a few years after the approvals are given. They have up to 5 years by law.

MCM 2: Public Participation

- ☒ Provided an opportunity for public participation in review and implementation of SWMP and complied with State Public Notice requirements as described in the Merrimack SWMP.
- ☒ Kept records relating to the permit available for 5 years and made available to the public

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

Description: The Stormwater Management Program (SWMP) was publicly reviewed at Merrimack's Yearly Town Council Meeting on June 9, 2022. The Town Councilors and the public were given opportunity to ask questions on the plan. Documents and records relating to the permit are retained and available for 5 years to the public at Merrimack Town Hall, and on the website.

Measurable Goal(s):

Input was received and records are maintained. **Goal was achieved.**

Public involvement or participation opportunities are ancillary to daily operations.

And

Merrimack has conducted the following public involvement or participation opportunities:

Hazardous Waste Collection Day - 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

Adopt A Road – 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. This effort keeps the litter from getting into our catch basins.

Eversource Freon Event - 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. This event happens at our DPW Solid Waste facility.

Rain Barrel Sale and Distribution through DPW Solid Waste – allows residents to collect and use storm water that would otherwise flow into the drainage system. Rain barrels are for sale at our DPW Solid Waste facility, 2 Rain Barrels were sold during the annual reporting time frame.

Touch a Truck – first graders tour highway facilities and use Enviroscope table to learn about rainwater. The students also learn about littering, put their hand prints on plows, and are given coloring books.

Compost Bins for Sale through DPW Solid Waste - allows residents to collect and produce their own compost. Recycling materials thus helps keep the environment clean, there were 2 Compost bins sold during the annual reporting time frame.

Describe progress made on any **incomplete requirements** listed above or optionally provide any additional relevant details, in the box below:

We have continued with the programs as best as we were able to due to Covid-19 restrictions. We have been trying to find other ways to get the messages out there including using the Town Web site and our Facebook Page. Information regarding these and other events that we hold in Town are listed on our Facebook Page: <https://www.facebook.com/MerrimackDPW/>

MCM 3: Illicit Discharge Detection and Elimination (IDDE)

Sanitary Sewer Overflows (SSOs)

- This SSO section is NOT applicable because we DO NOT have sanitary sewer.
- This SSO section is NOT applicable because we DID NOT find any new SSOs.
- The SSO inventory has been updated, including the status of mitigation and corrective measures implemented or was addressed and can be found in submission and found at the following website: N/A

Below, report on the number of SSOs identified in the MS4 system and removed:

Number of SSO's identified **during this reporting period**: 0 SSO's identified

Number of SSO's removed **during this reporting period**: 0 SSO's removed

MS4 System Mapping

- Updated system map due in Year 2 as necessary:

Provide additional status information regarding your map:

Map of storm sewer system and associated outfalls is continually updated to reflect findings, changes, and continued construction.

Screening of Outfalls/Interconnections

- No outfalls were inspected for dry weather screening **during this report period**.
- Dry weather outfall screening data can be found in submission as **Attachment 3 – Dry Weather Screening Data 2022**.

Dry Weather Screening

Number of outfalls screened **during this reporting period**: 72 outfalls

Percent of total known outfalls screened to date **during this reporting period**: 94.7%

The inventory and ranking of outfalls/interconnections was updated and the IDDE Program Plan was revised as a result. The revised inventory and ranking of outfalls/interconnections can be found in submission as attachment 4.

Wet Weather Screening

- No outfalls were inspected for wet weather screening **during this report period.**
- Wet weather outfall screening data can be found in submission or at the following website: N/A

Number of outfalls screened **during this reporting period:** 0 outfalls

Percent of total outfalls screened to date **during this reporting period:** 0%

Catchment Investigations

- No catchment investigations were conducted **during this report period.**
- Catchment investigation data can be found in submission.

Number of catchment investigations **during this reporting period:** 1 catchment investigation (Harris Ave) investigation began in Year 3, was closed in Year 4.

Percentage of total catchments investigated to date (Years 1 - Year 4): 3.7% (total of 3 investigations between Years 1-4/ out of 82 outfalls)

IDDE Progress

- No illicit discharges were found **during this reporting period.**
- The illicit discharges removal report can be found in submission and found at the following website:

Number of illicit discharges identified **during this reporting period:** 0

Number of illicit discharges removed **during this reporting period:** 0

Estimated gallons of flow removed **during this reporting period:** 0 gallons

Total number of illicit discharges identified since the effective date of the permit (July 1, 2018):
1 illicit discharges identified

Total number of illicit discharges removed since the effective date of the permit (July 1, 2018):
1 illicit discharges identified

Employee Training

- Provided training to employees involved in IDDE program **during the reporting period:**

Merrimack held an IDDE training session for municipal staff on June 23, 2022. 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.

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.

Describe progress made on any **incomplete requirements** listed above or optionally provide any additional relevant details, in the box below:

Additional Trainings for employees:

9/22/21 – ASSHTO Stormwater Maintenance Training – Maintenance Stormwater Field Guide – All Highway Personnel

6/8/22 – UNH T2 – Installation of Culverts – 2 Employees

MCM 4: Construction Site Stormwater Runoff Control

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

Number of site plan reviews completed *during this reporting period*: 25 site plan reviews

Number of inspections completed *during this reporting period*: 320 stormwater site inspections

Number of enforcement actions taken *during this reporting period*: 0 enforcement actions

Merrimack works closely with contractors to address environmental concerns for the least environmental impact.

Describe progress made on any **incomplete requirements** listed above or optionally provide any additional relevant details, in the box below:

Merrimack requires that the contractor for each construction site submit SWPP weekly and after at least 0.25 in of rain. These inspections are not included in the number above. The inspections listed above are only for Town Personnel performing inspections.

In addition, DPW Administration staff visit each site which is under construction at least on a weekly basis. Highway crews and other departments have also been asked/trained to report back to DPW Admin with any issues they see.

We work hard at stopping any issues before they become enforcement issues. Before issues rise to enforcement action status we work with the contractors to immediately correct any issues that might be occurring. Good working relationships and communications with the contractors gone a long way for prevention.

MCM 5: Post-Construction Stormwater Management in New Development and Redevelopment

Ordinance or Regulatory Mechanism

- Merrimack has regulatory mechanism consistent with permit requirements 2.3.6.a.ii.
Date regulatory mechanism was adopted: Prior to July 1st 2021

As-built Drawings

Number of as-built drawings received *during this reporting period*: 4 sets of As-built drawings

Retrofit Properties Inventory

- Identified permittee-owned properties that could potentially be modified or retrofitted with BMPs to reduce impervious cover

Merrimack has identified the following permittee-owned properties that could be modified or retrofitted with BMPs to mitigate impervious areas:
See Attachment 8 – Permittee Owned Properties

Street Design and Parking Lot Guidelines

- Developed a report assessing current street design and parking lot guidelines and other local Requirements within the municipality that affect the creation of impervious cover, will make it available as part of the SWMP 2022, and:
 - No updates were recommended.
 - Updates were recommended. The anticipated date or date of completion for updates is June or August 2024 outlined in the report.

Green Infrastructure Practices

- Developed a report assessing local regulations to determine the feasibility of making green infrastructure practices allowable when appropriate site conditions exist, will be made available as part of the SWMP 2022, and:
 - Updates were recommended. The anticipated date or date of completion for updates is June or August 2024 outlined in the report.

Describe progress made on any **incomplete requirements** listed above or optionally provide any additional relevant details, in the box below:

Merrimack is in the process of updating the Subdivision Regulations and the Construction Regulations which will have additional erosion control and impervious reductions built in. Presently, Merrimack follows NH DES guidance on allowing the Green Infrastructure Practices. Regulations are still going through the vetting process, no date has been set for their finalization. As you are well aware sweeping changes take time to work through the process.

MCM 6: Good Housekeeping

Catch Basin Cleaning

- Properly stored and disposed of catch basin cleanings so they did not discharge to receiving waters
- Report on the actions taken if a catch basin sump is more than 50% full during two consecutive routine inspections/cleaning events:

Number of catch basins inspected **during this reporting period:** 944 catch basins

Number of catch basins cleaned **during this reporting period:** 944 catch basins

Total volume or mass of material removed from all catch basins **during this reporting period:** 497 tons

Total number of catch basins within the MS4 system: 3711 Town owned and maintained catch basins

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.

Street Sweeping

- Properly stored and disposed of street sweepings so they did not discharge to receiving waters
- All curbed roadways were swept at least once within the reporting period

Number of (lane) miles swept **during this reporting period:** 360 miles

Mass of swept material **during this reporting period:** 2,360 tons

Stormwater Pollution Prevention Plan (SWPPP)

- Implemented SWPPPs for all permittee owned or operated maintenance garages, public works yards, transfer stations, and other waste handling facilities

Number of site inspections completed for **during this reporting period:** 29 site inspections

Number of corrective actions taken **during this reporting period:** 0 Corrective Actions

Describe any corrective actions taken at a facility with a SWPPP: **No corrective actions necessary**

Operations and Maintenance (O & M) Programs

- O&M programs for all permittee owned facilities have been completed and/or updated as noted below:
- Implemented all maintenance procedures for permittee owned facilities in accordance with O&M programs
- Updated inventory of all permittee owned facilities as necessary

All permittee owned facilities, including an inventory, are included in our SWMP. There were no changes to report during Year 4.

- Implemented program for MS4 infrastructure maintenance to reduce the discharge of pollutants as outlined in the SWMP
- Inspected all permittee owned treatment structures (excluding catch basins) as outlined in the SWMP
- Enclosed all road salt storage piles or facilities and implemented winter road maintenance procedures to minimize the use of road salt as outlined in the SWMP

Describe progress made on any **incomplete requirements** listed above **or** optionally provide any additional relevant details, in the box below:

N/A

Appendix F and H: Water Quality Limited Waters & TMDLs

Bacteria/Pathogens Impairment (Appendix H) AND TMDL (Appendix F)

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

Describe progress made on any **incomplete requirements** listed above or optionally provide any additional relevant details, in the box below:

N/A

Chloride Impairment (Appendix H)

- Permittee does not have a chloride impairment
- Updated Salt Reduction Plan as necessary *during this reporting period* and can be found in submission and found at the following website: **N/A**

Describe progress made on any **incomplete requirements** listed above or optionally provide any additional relevant details, in the box below:

N/A

Nitrogen Impairment (Appendix H)

- Permittee does not have a nitrogen impairment
- Distributed an annual message that encourages the proper use and disposal of grass clippings and encourages the proper use of slow-release fertilizers **during this reporting period**
- Distributed an annual message encouraging the proper management of pet waste, including noting any existing ordinances where appropriate **during this reporting period**
- Distributed an annual message encouraging the proper disposal of leaf litter **during this reporting period**
- Increased street sweeping frequency of all municipal owned streets and parking lots subject to Permit part 2.3.7.d.iii to a minimum of two times per year (spring and fall) **during this reporting period**
- Increased street sweeping frequency of all municipal owned streets and parking lots subject to Permit part 2.3.7.d.iii to a minimum of one time per year (spring) and implemented a fall leaf litter collection program in lieu of post-drop street sweeping **during this reporting period**

Nitrogen Source Identification Report

- The Nitrogen Source Identification Report can be found in submission or at website: N/A

Potential Structural BMPs

Describe progress made on any **incomplete requirements** listed above or optionally provide any additional relevant details, in the box below:

N/A

Phosphorus Impairment (Appendix H)

- Permittee does not have a phosphorus impairment
- Distributed an annual message that encourages the proper use and disposal of grass clippings and encourages the proper use of slow-release fertilizers *during this reporting period*
- Distributed an annual message encouraging the proper management of pet waste, including noting any existing ordinances where appropriate *during this reporting period*
- Distributed an annual message encouraging the proper disposal of leaf litter *during this reporting period*
- Increased street sweeping frequency of all municipal owned streets and parking lots subject to Permit part 2.3.7.d.iii to a minimum of two times per year (spring and fall) *during this reporting period*

Phosphorus Source Identification Report

- The Phosphorus Source Identification Report can be found in submission as Attachment 6.

Potential Structural BMPs

The tracking and accounting elements associated with the NH MS4 permit are ongoing, adaptive and are consistent with Attachment 3 of Appendix F of the permit. Currently there is emergent utilization of a new database tracking system called the Pollutant Tracing and Accounting Program (PTAP) supported by NHDES and a select number of municipalities. Coalition communities understand the importance of this effort and are committed to continuing to work towards better tracking and accounting strategies for both structural and non-structural BMPs. PTAP theoretically has limitless expansion capacity in the region and is already integrated with the EPA Region 1 supported BMP Accounting and Tracking Tool (BATT). This emerging collaboration will be a large component of future implementation efforts. While BMP tracking and accounting programs are not fully functional, these integrated planning tools provide a comprehensive solution to successful tracking and accounting metrics now and moving forward in the future.

Describe progress made on any **incomplete requirements** listed above or optionally provide any additional relevant details, in the box below:

Due to budget constraints the second street sweeping did not occur last fall. Some of the areas requiring a second sweeping due to the TMDL or Impairments will be able to be done this fall. Going forward the extra funds needed will be asked for in the next budget cycle. Funding will be dependent upon the approval of the Town Tax Payers of the proposed Budget. Budget constraints could be very well have a negative impact on the program if they don't pass.

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

- Permittee does not have a solids, oil and grease, or metals impairment(s)
- Increased street sweeping frequency of all municipal owned streets and parking lots to a schedule that targets areas with potential for high pollutant loads **during this reporting period**

Describe progress made on any **incomplete requirements** listed above **or** optionally provide any additional relevant details, in the box below:

Due to budget constraints the second street sweeping did not occur last fall. Some of the areas requiring a second sweeping due to the TMDL or Impairments will be able to be done this fall. Going forward the extra funds needed will be asked for in the next budget cycle. Funding will be dependent upon the approval of the Town Tax Payers of the proposed Budget.

Chloride TMDL (Appendix F)

- Permittee does not have a chloride TMDL
- Updated Chloride Reduction Plan as necessary **during this reporting period** and can be found in submission and found at the following website: N/A

Describe progress made on any **incomplete requirements** listed above **or** optionally provide any additional relevant details, in the box below:

N/A

Lake and Pond Phosphorus TMDL (Appendix F)

- Permittee does not have a lake and pond phosphorus TMDL
- Calculated baseline phosphorus, allowable phosphorus load, and phosphorus reduction requirement **during this reporting period**
- Defined the scope of the Lake Phosphorus Control Plan (LPCP).

The PCP scope is the urbanized area portion of our jurisdiction discharging to the impaired Waterbody **during this reporting period**

Describe progress made on any **incomplete requirements** listed above **or** optionally provide any additional relevant details, in the box below:

Merrimack received a Clean Water State Revolving Fund (CWSRF) loan to develop a Stormwater (Drainage) Planning Project for a section of Baboosic Lake known as Pine Knoll Shores. This report will be addressing the existing pollutant load and will be outlining the next recommended steps for the pollutant reduction. Once the report is complete we will be applying for another loan/grant to complete the Design Plans and then implementing the construction of the proposed BMP's to reduce the pollutant load. This is all dependent upon the available funding and the Tax Payer approval of the Capital Improvements.

The next project we will be starting is to apply for next year are the CWSRF funding sources for the Horseshoe Pond area to implement the same type of planning process. Timelines are contingent upon the available funding.

Additional Required Information

Monitoring or Study Results

Results from all stormwater or receiving water quality monitoring or studies conducted **during the reporting period** and **not otherwise mentioned above**, where the data is being used to inform permit compliance or permit effectiveness is:

Not applicable

The results from additional reports or studies are in submission **or** can be found at the following website: N/A

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:

N/A

Description of Any Changes in Identified BMPs or Measurable Goals

Merrimack has implemented activities in accordance with the permit and outlined in the SWMP. All BMPs and measurable goals outlined in the SWMP are appropriate.

COVID-19 Impacts

If any of the above Year 4 requirements could not be completed **during this reporting period** due to the impacts of COVID-19, please identify the requirement(s) that could not be completed, any actions taken to attempt to complete the requirement, and reason the requirement could not be completed below:

COVID-19 caused cancellation of Town events, and training classes early in the reporting period. There has been a large reduction in the municipal staffing due to the aftermath of COVID-19. There have been absences due to the illness, when each variant that comes around this creates a new round absenteeism. The Covid-19 has led to inflation in nearly all aspects of life, this is creating a very volatile work environment where people are retiring and getting new jobs at higher rates. A municipality cannot spend outside of the established budget and are very much reliant on the approval of the Tax Payer for the Budget each year. It is getting more and more difficult to get the budgets passed especially when the residents are feeling the pinch everywhere else in their lives.

Activities Planned for Next Reporting Period

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