

**Year 3 Annual Report**  
**New Hampshire Small MS4 General Permit**  
**Reporting Period: July 1, 2020-June 30, 2021**

*\*\*Please DO NOT attach any documents to this form. Instead, attach all requested documents to an email when submitting the form\*\**

*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, 2020 and June 30, 2021 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 (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: <https://www.epa.gov/tmdl/region-1-impaired-waters-and-303d-lists-state>

<b>Impairment(s)</b>			
<input type="checkbox"/> Bacteria/Pathogens	<input checked="" type="checkbox"/> Chloride	<input type="checkbox"/> Nitrogen	<input checked="" type="checkbox"/> Phosphorus
<input checked="" type="checkbox"/> Solids/ Oil/ Grease (Hydrocarbons)/ Metals			
<b>TMDL(s)</b>			
<input checked="" type="checkbox"/> Bacteria and Pathogen	<input checked="" type="checkbox"/> Chloride	<input type="checkbox"/> 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 3 Requirements

- Inspected and screened all outfalls/interconnections (excluding Problem and Excluded outfalls)
- Updated outfall/interconnection priority ranking based on the information collected during the dry weather inspections as necessary
- Post-construction bylaw, ordinance, or other regulatory mechanism was updated and adopted consistent with permit requirements

*Optional:* If you would like to describe progress made on any incomplete requirements listed above, provide any additional information, and/or if any of the above year 3 requirements could not be completed due to the impacts of COVID-19, please identify the requirement that could not be completed, any actions taken to attempt to complete the requirement, and reason the requirement could not be completed below:

The Town has drafted updates to the existing municipal code which governs stormwater management to comply with the post-construction stormwater runoff control requirements of the permit. The impacts of COVID-19 have slowed the adoption process, and due to the Town's commitment to adopting and implementing a comprehensive stormwater management regulatory framework, it has taken longer than anticipated to ensure that municipal departments involved in review/approval of proposed construction projects are in agreement on the language to be incorporated that will not only meet permit requirements, but the Town's stormwater management needs going forward. The Town intends to hold the required public hearings and discuss these regulatory updates with the Board of Selectmen before the end of the calendar year 2021. The Town is working to get these regulatory updates adopted and incorporated into the municipal codes as soon as possible.

### 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 website:

- Properly stored and disposed of catch basin cleanings and street sweepings so they did not discharge to receiving waters
- Provided training to employees involved in IDDE program within the reporting period
- All curbed roadways were swept at least once within the reporting period
- Updated system map due in year 2 as necessary
- 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, provide any additional information, and/or if any of the above annual requirements could not be completed due to the impacts of COVID-19, please identify the requirement that could not be completed, any actions taken to attempt to complete the requirement, and reason the requirement could not be completed below:

No employee training was conducted during the reporting period related to the Town's IDDE program or Good Housekeeping/ Pollution Prevention. The impacts of COVID-19 resulted in the postponement of any in-person training.

The Town stores a majority of their salt within their salt shed. Some sand/salt mix for town use and use by residential property owners is also stored outside in bins on site. These bins are covered via tarps. As part of a feasibility study being conducted at the DPW Facility, the Town is evaluating more permanent long-term storage options for this limited sand/salt mix that is available on site.

The Town inspected stormwater treatment structures known to be under town jurisdiction. The Town is still actively working to reconcile ownership of structural BMPs, and therefore there may be additional BMPs in the future where the responsibility for annual inspection falls under the Town's umbrella as opposed to a private entity.

**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 H and F 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**Annual Requirements

*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:*

During Permit Year 1, the Town developed a Chloride Reduction Plan for Policy-Porcupine Brook, which has an approved TMDL for chloride, as required by the MS4 Permit. This Plan was modified during Permit Year 3 to include Policy Brook and the unnamed tributary to Harris Brook, which require, but do not currently have, approved TMDLs for chloride.

**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 H and F 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)

*Potential structural BMPs*

- 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.
  - The BMP information is attached to the email submission
  - The BMP information can be found at the following 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:

Although Captain Pond currently has a TMDL for phosphorus, the TMDL was not approved prior to the permit effective date and therefore the Town is not subject to the requirements of Appendix F under the current permit. Appendix H requires the Town to track and estimate the amount of phosphorus removed by structural BMPs installed as a result of the retrofit inventory conducted as part of the Phosphorus Source Identification Report for Captain Pond, which must be completed by the end of Permit Year 4. As required by the permit, at least one structural BMP must be installed by the end of Permit Year 6. Appendix H does not require permittees to estimate the amount of phosphorus removed by existing structural BMPs-- that is only a requirement for permittees that discharge to a waterbody with an existing TMDL for phosphorus where a municipality wants to obtain credit for phosphorus removed as part of a comprehensive Phosphorus Control Plan, and is therefore not applicable to Salem. However, once the Town begins installation of structural BMPs as identified as part of their Phosphorus Source Identification Report, the Town will track and estimate the phosphorus removed by the BMP consistent with Attachment 3 to Appendix F, including reporting on BMP type, total area treated, design storage volume, and the estimated phosphorus removed in mass per year.

As part of the proposed regulatory updates related to post-construction stormwater management, the Town of Salem will be tracking phosphorus removal attributable to structural BMPs on development projects. This effort will ensure that phosphorus reduction requirements are being met for new development and redevelopment, and will be beneficial to the Town in compliance with the TMDL for Captain Pond.

**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

*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 TMDL**

- Implemented Chloride Reduction Plan or Alternative Chloride Reduction Plan

*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:

### 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:

The list of outfalls/interconnections and their receiving waters was updated during Permit Year 3 as part of the completed dry-weather outfall/interconnection screening and sampling effort. The updated list of receiving waters and outfalls is included in Section 1 of the Town's SWMP.

The 2018 New Hampshire list of impaired waters, or 303(d) list, was approved by EPA on February 25, 2020. The updated list of impaired waters includes the following changes that are relevant to Salem:

- 1) Captain Pond has been moved from designation as a Category 5 receiving water to a Category 4A due to the development and approval of the "Total Maximum Daily Load for Phosphorus for Captain Pond, Salem NH" in September 2017.
- 2) Arlington Mill Reservoir was added to the 2018 list of impaired waters after cyanobacteria blooms occurred in amounts and for a duration that interfered with the primary contract recreational use of the lake. Arlington Mill Reservoir is now listed as a Category 5-M water body.

## 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: Brochure/Factsheet**

Message Description and Distribution Method:

During Permit Year 3, the Town developed a flyer focusing on stormwater pollution control for industrial facilities. The flyer was posted to the Town website.

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

The flyer was mailed, along with a cover letter, to the list of 10 industrial facilities within MS4 boundaries. The flyer was also posted to the Town's stormwater public education web page. The web page was viewed 54 times during the reporting period.

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: Displays/Posters/Kiosks (4 Messages)**

Message Description and Distribution Method:

In addition to maintaining general stormwater information at kiosks around Salem, the Town also posted the EPA pamphlet "Protecting Water Quality from Urban Runoff", the UNH fact sheet "Green Grass & Clean Water", a Salem-specific pet waste brochure, and a Salem-specific yard waste flyer to the Town's website during the reporting period. These materials are included in Appendix G of the SWMP and at the following location: <https://www.townofsalemnh.org/engineering/pages/public-education-and-outreach>

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

The Town ensured that the stormwater information was visible to residents and replaced/updated the materials both online and in kiosks as needed. The stormwater public education web page was viewed 54 times during the reporting period. The yard waste/leaf litter flyer was posted through the Town's Facebook page on October 14, 2020 and reached 782 people, with 19 engagements. The grass clippings and fertilizer flyer was posted through the Town's Facebook page on June 15, 2021 and reached 820 people, with 15 engagements.

Message Date(s): FY2021

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:

The Town decided to post information online as well as at kiosks since the internet is a cost-effective and efficient way to share information with a broad audience.

**BMP: Brochures/Pamphlets**

Message Description and Distribution Method:

The Town posted the EPA flyer "What you can do as a Developer" to its website, providing general information on stormwater management during construction, including required sediment and erosion control measures, to prospective developers and contractors. The flyer is available at this location: <https://www.townofsalemnh.org/engineering/pages/public-education-and-outreach>

Targeted Audience: Developers/Contractors (construction)

Responsible Department/Parties: Engineering Division, Planning & Community Development

Measurable Goal(s):

This pamphlet was made available to a wide audience by posting it to the Town's stormwater public education web page. The web page was viewed 54 times during the reporting period.

Message Date(s): FY2021

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: Website**

Message Description and Distribution Method:

The Health Division maintains a comprehensive web page dedicated to septic system installation and maintenance. It provides information regarding how often septic systems should be inspected and pumped, the environmental impacts associated with septic system failures, and what materials should not be discharged to the plumbing system as they can have a negative impact on septic systems. There is also a separate link to

EPA's webpage - "Do Your Part, Be Septic Smart", which provides information on septic system maintenance.

Targeted Audience: Residents

Responsible Department/Parties: Engineering, Health Division

Measurable Goal(s):

This information is available to all residents with septic systems, not just those property owners located in the catchments tributary to water bodies impaired for bacteria. The information is available at this location: <https://www.townofsalemnh.org/health-division/pages/septic-systems>

Message Date(s): FY2021

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:Brochures/Factsheets**

Message Description and Distribution Method:

The Town has posted five separate flyers/brochures from the NHDES regarding winter maintenance best management practices regarding anti-icing, calibration, prewetting, storage and maintenance, and salt application and tracking.

Targeted Audience: Businesses, Institutions and Commercial Facilities, Industrial Facilities

Responsible Department/Parties: Engineering Division, DPW

Measurable Goal(s):

The materials are all posted to the Town's stormwater public education web page. The web page was viewed 54 times during the reporting period.

Message Date(s): FY2021

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:

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 updated the SWMP to reflect progress made during Permit Year 3 and posted the updated document to its website at the link provided on the first page of this report. The Town plans to continue to keep its SWMP posted on its website. The Town also posts their Annual Reports to EPA on the Town website. The Town makes their SWMP available at Town Hall and at the DPW Facility.

On January 25, 2021, a presentation was made to the Select Board, which was open to the public, discussing implementation of the Town's Stormwater Management Program.

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:**

Salem continued to provide multiple opportunities for public involvement during the reporting period. The Town held its annual Household Hazardous Waste day on October 31, 2020, and collected 38,725 pounds of hazardous material that may have otherwise been disposed of improperly. Materials collected include pesticides, aerosols, antifreeze, engine oil, paint, and various kinds of batteries. The disposal manifest for the hazardous materials collected is included in the SWMP.

The Municipal Services Department hosted and participated in a community-wide roadside litter clean-up event between March 29 and April 8, 2021. As part of the clean-up, 2.06 tons of paper, cans, bottles, batteries, glass, cardboard, tires, hypodermic needles, car parts, and construction materials were collected and disposed of properly from 41 streets.

The Town also continued its mandatory recycling program and 2283.6 tons of recycling was collected during the reporting period. The Town continued to maintain a public works hotline on the Town's website to respond to work order requests.

Rain barrels were made available for residents to purchase and 37 rain barrels were sold to 29 individuals/households during the reporting period.

## **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**

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

During the reporting period, the Town was able to refine their outfall and interconnection inventory as a result of dry weather outfall/interconnection screening efforts. The Town will continue to update their MS4 system mapping as catchment investigations are conducted during Permit Year 4.

### **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 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:

### **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 website:

Catchment investigation data for catchments investigated in prior years has been posted to the Town's website at the following location: <https://www.townofsalemnh.org/engineering/pages/stormwater-management-program-swmp>. The Town will resume catchment investigations during Permit Year 4. The Town's System Vulnerability Factor matrix has been attached to the e-mail included with this annual report submission.

*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:*

The Town developed catchment investigation procedures as part of their IDDE plan during Permit Year 1. The Town will resume catchment investigations in accordance with permit requirements in Permit Year 4.

### **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 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**:

No in-house employee training was conducted during the reporting period. The Town had plans to conduct training on the IDDE program and Good Housekeeping/ Pollution Prevention by June 30, 2021. However, the impacts of COVID-19 caused the training to be postponed.

Individual employees (Municipal Services Department) attended various virtual training workshops and conferences focused on stormwater management and erosion & sedimentation control during the reporting period.

### **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:

If violations or potential violations are identified during a construction site inspection, the item(s) is verbally discussed with the site contractor and addressed immediately. In the event that an item is not addressed immediately (while the inspector is still on-site), then it is noted in the inspection report and checked during the next inspection.

### **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**

Describe the status of the street design and parking lots assessment due in year 4 of the permit term, including any planned or completed changes to local regulations and guidelines:

The Town will complete the required street design and parking lot assessment by the end of Year 4, as required by the permit.

#### **Green Infrastructure Report**

Describe the status of the green infrastructure report due in year 4 of the permit term, including the findings and progress towards making the practice allowable:

The Town will complete the required green infrastructure report by the end of Year 4, as required by the permit.

## 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:

The Town is still working to collect the necessary data to develop a Catch Basin Optimization Plan. If a catch basin sump is more than 50% full during two consecutive routine inspections/cleaning events, the Town will document the finding, investigate the contributing drainage area for sources of excessive sediment loading, and to the extent practicable, abate contribution sources.

### 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:

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:

Four site inspections were completed during the reporting period. Two site inspections were conducted at the DPW Facility and two were conducted at the Transfer Station. Due to miscommunications in scheduling and staff turnover, inspections were not conducted for the first two quarters of the reporting period. There were minimal corrective actions taken at these facilities due to the lack of funding available for large scale site improvements. The Town has partnered with a local engineering consultant to conduct a site needs assessment and feasibility study for improvements at the DPW Facility. The Town is examining more permanent long-term storage options for materials (i.e. sand/salt mix) and more sustainable vehicle washing operations among other site and operations improvements.

**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**

*Optional:* 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:

## **COVID-19 Impacts**

*Optional:* If any of the above year 3 requirements could not be completed due to the impacts of COVID-19, please identify the requirement that could not be completed, any actions taken to attempt to complete the requirement, and reason the requirement could not be completed below:

Impacts due to COVID-19 response are noted above in applicable MCMs/sections of this annual report.

## **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 4 requirements summarized below. (Note: impaired waters and TMDL requirements are not listed below)

Yes, I agree

- Develop a report assessing current street design and parking lot guidelines and other local requirements within the municipality that affect the creation of impervious cover
- Develop a report assessing existing local regulations to determine the feasibility of making green infrastructure practices allowable when appropriate site conditions exist
- Identify a minimum of 5 permittee-owned properties that could potentially be modified or retrofitted with BMPs to reduce impervious areas

## **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)

Provide any additional details on activities planned for permit year 4 below:

## Part V: Certification of Small MS4 Annual Report 2021

### 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:

Christopher A. Dillon

Title:

Town Manager

Signature:



Date:

9/24/21

*[Signatory may be a duly authorized representative]*