

# Year 7 Annual Report

## New Hampshire Small MS4 General Permit

### Reporting Period: July 1, 2024-June 30, 2025

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

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

### Part I: Contact Information

Name of Municipality or Organization:

EPA NPDES Permit Number:

#### Primary MS4 Program Manager Contact Information

Name:  Title:

Street Address Line 1:

Street Address Line 2:

City:  State:  Zip Code:

Email:  Phone Number:

#### Stormwater Management Program (SWMP) Information

SWMP Location (publicly available web address):

Date SWMP was Last Updated:

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

## Part II: Self-Assessment

First, in the box below, select the impairment(s) and/or TMDL(s) that are applicable to your MS4. Make sure you are referring to the most recent EPA approved Section 303(d) Impaired Waters List which can be found here: <https://www.epa.gov/tmdl/region-1-impaired-waters-and-303d-lists-state>

<b>Impairment(s)</b>			
<input checked="" 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	
<input type="button" value="Clear Impairments and TMDLs"/>			

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

### Year 7 Requirements

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

### Annual Requirements

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

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

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

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

Outfalls flagged as Problem Outfalls at the beginning of the permit have all been investigated. Follow-up investigations have been initiated in all catchments where new information gathered on the outfall/interconnection indicated likely sewer input, which includes drainage infrastructure within 12 catchment areas in Salem. During Permit Year 7, follow-up investigations included supplementary catchment investigations, dye testing, and CCTV investigation. Efforts to identify and eliminate sources of likely sewer input will continue in Permit Year 8, including sandbagging, dye testing, and continued monitoring during IDDE efforts.

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

Annual Requirements

*Public Education and Outreach\**

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

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

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

**Chloride Impairment**

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

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

The Town developed a Chloride Reduction Plan for Policy-Porcupine Brook in Permit Year 1. This plan was updated and expanded on in Permit Year 3 to include Policy Brook and an unnamed tributary to Harris Brook. Annual Salt Report Forms have been submitted for Permit Years 3-7. The Town utilized the Annual Salt Usage Report Form prepared by NHDES in lieu of using the UNH Technology Transfer Center Online Tool for reporting salt usage.

## Phosphorus Impairment

### Annual Requirements

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

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

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

#### *Good Housekeeping and Pollution Prevention for Permittee Owned Operations*

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

#### *Structural BMPs*

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

Rain Garden/Biofiltration

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

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

The phosphorus reduction data for this BMP was submitted through the Pollutant Tracking and Account Project (PTAP) in Permit Year 7. The PTAP tool estimated a total phosphorus removal of 1.87 lb/year for the BMPs installed in the Captains Pond watershed.

Total estimated phosphorus removed in **lbs/year** from the installed BMPs: 1.87

*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 Captains 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 (PSIR) for Captains Pond, which was completed in 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 water body 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, as the Town installs structural BMPs as identified in 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 estimate phosphorus removed in mass per year. As part of the regulatory updates related to post-construction stormwater management, the Town of Salem will track 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 Captains Pond. The Town developed a Phase II Phosphorous Source Identification Report for Captains Pond during Permit Year 5 to further evaluate the BMP retrofit opportunities identified in the PSIR developed during the previous permit year.

Two retrofit projects have occurred in the Captains Pond Watershed. Salem is utilizing the Pollutant Tracking and Account Project (PTAP), to track nutrient reductions associated with stormwater structural and non-structural best management practices. PTAP was developed by the University of New Hampshire Stormwater Center and New Hampshire Department of Environmental Services utilizing the EPA Region 1 approved performance curves, to provide New Hampshire communities with a way to track their nutrient reductions. PTAP allows Salem the benefit of utilizing a uniform, defensible and consistent method for tracking reductions so that a common, weight of evidence based approach can be shared with other entities including EPA, NHDES, and other MS4 communities and interest groups. The consistent and systematic tracking and accounting framework also allows for routine updates when improved science becomes available. In Permit Year 7, the following projects were submitted to PTAP:

1. Captains Drive Drainage Improvements (Bioretention) - Demonstration Project

The Town completed a roadway project at Captains Drive in 2018, which included updates to the drainage system and the installation of a bioretention area immediately downstream of outfall CAP-0517-OF.

2. Plaisted Circle Right-of-Way Improvements

The Town completed a roadway project at Plaisted Circle in 2020, which included the removal of two direct stormwater discharges to Captains Pond.

The Town swept all streets tributary to Captains Pond twice during the reporting period.

The Town developed a preliminary watershed-based plan for Captains Pond to establish water quality goals and outline a series of management measures that can be implemented to achieve those goals. The Town received SRF funding to expand development of the watershed-based plan and to move forward with the preliminary design of structural BMPs within the Captains Pond watershed. This work will begin in Permit Year 8.

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

Annual Requirements

*Good Housekeeping and Pollution Prevention for Permittee Owned Operations*

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

The street sweeping schedule is attached to the Town's SWMP, available on the Town's website: <https://www.salemnh.gov/483/Stormwater-Management-Program-SWMP>

*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:

Metals impairments include iron and arsenic impairments for Policy-Porcupine Brook. The Town continues to evaluate potential areas of high pollutant loads within the tributary drainage area, and adjust street sweeping frequencies as needed.

**Chloride TMDL**

Annual Requirements

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

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

The Town developed a Chloride Reduction Plan for Policy-Porcupine Brook in Permit Year 1. This plan was updated and expanded on in Permit Year 3 to include Policy Brook and an unnamed tributary to Harris Brook.

The Town reported the amount of salt applied to all municipally-owned and maintained surfaces by completing the New Hampshire DES Annual Salt Usage reporting form and submitting it to NHDES. Annual Salt Report Forms have been submitted for Permit Years 3-7.

*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 7. The updated list of receiving waters and outfalls is included in Section 1 of the Town's SWMP.

The 2020/2022 Section 303(d) Surface Water Quality List for the State of New Hampshire, was approved by EPA on March 14, 2022. The updated list of impaired waters includes the following changes that are relevant to Salem:

- 1) Arlington Mill Reservoir was added to the 2018 list for cyanobacteria hepatotoxic microcystins
- 2) Canobie Lake was added to the 2020/2022 list for dissolved oxygen saturation and dissolved oxygen.
- 3) Shadow Lake was added to the 2020/2022 list for pH. Shadow Lake - Shadow Lake Association Beach was also added to the 2020/2022 list for E. coli.

## 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: Fertilizer Message**

Message Description and Distribution Method:

The Town maintained a UNH "Green Grass & Clear Water" flyer on their stormwater public education webpage (<https://salemnh.gov/484/Public-Education-Outreach>) with water-quality friendly lawn care and fertilizer recommendations.

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

This flyer was made available to a wide audience by posting it to the Town's stormwater public education web page.

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:

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#### **BMP: Leaf Litter Message**

Message Description and Distribution Method:

The Town developed and maintained a flyer on their stormwater public education webpage (<https://salemnh.gov/484/Public-Education-Outreach>) with information about proper disposal of leaves and grass clippings.

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

This flyer was made available to a wide audience by posting it to the Town's stormwater public education

web page.

Message Date(s): Permit Year 7

Message Completed for: Appendix F Requirements  Appendix H Requirements

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

If yes, describe why the change was made:

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**BMP: Pet Waste Message**

Message Description and Distribution Method:

The Town developed and maintained a flyer on their stormwater public education webpage (<https://salemnh.gov/484/Public-Education-Outreach>) with information about proper disposal of pet waste.

Targeted Audience: Residents

Responsible Department/Parties: Engineering Division

Measurable Goal(s):

This flyer was made available to a wide audience by posting it to the Town's stormwater public education web page.

Message Date(s): Permit Year 7

Message Completed for: Appendix F Requirements  Appendix H Requirements

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

If yes, describe why the change was made:

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**BMP: Septic Message**

Message Description and Distribution Method:

The Town maintained a factsheet on their stormwater public education webpage (<https://salemnh.gov/484/Public-Education-Outreach>) with information about septic system maintenance.

Additionally, The Health Division maintains a comprehensive web page (<https://www.townofsalemnh.org/health-division/pages/septic-systems>) 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 web page - "Do Your Part, Be Septic Smart", which provides information on septic system maintenance.

Targeted Audience: Residents

Responsible Department/Parties: Engineering Division

Measurable Goal(s):

This factsheet was made available to a wide audience by posting it to the Town's stormwater public education web page. 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.

Message Date(s): Permit Year 7

Message Completed for: Appendix F Requirements  Appendix H Requirements

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

If yes, describe why the change was made:

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**BMP: Winter Deicing Message**

Message Description and Distribution Method:

The Town maintained several factsheets and informational flyers on their stormwater public education webpage (<https://salemnh.gov/484/Public-Education-Outreach>) which cover winter maintenance best management practices regarding anti-icing, calibration, prewetting, storage and maintenance, and salt application and tracking, including:

- Anti-Icing, Pony Motor-Run Spreader and Hydraulic-Run Spreader Calibration, and Pre-Wetting NH Best Management Practices flyers
- An NHDES "Storage and Management of Deicing Materials" factsheet
- An NHDES "Snow and Ice Management for the Business Owner" factsheet
- A Green SnowPro brochure

Targeted Audience: Businesses, institutions and commercial facilities, Industrial Facilities

Responsible Department/Parties: Engineering Division

Measurable Goal(s):

These flyers and factsheets were made available to a wide audience by posting them to the Town's stormwater public education web page.

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: Developer Outreach**

Message Description and Distribution Method:

The Town maintained several informational flyers on their stormwater public education webpage (<https://salemnh.gov/484/Public-Education-Outreach>) with information targeting developers, including:

- A U.S. EPA "What you can do as a Developer" innovative development practices flyer
- An informational flyer developed by the Town regarding the New EPA 2022 Construction General Permit (CGP)
- An NHDES "Low Impact Development and Stormwater Management" factsheet

Targeted Audience: Developers (construction)

Responsible Department/Parties: Engineering Division

Measurable Goal(s):

Contractors, developers, and municipal or local organizations are made aware of the EPA 2022 Construction General Permit and its associated requirements including that those who wish to be considered a qualified person to conduct inspections must meet EPA training standards. Contractors, developers, and municipal or local organizations are also educated on how to properly select, install, and maintain construction related best management practices.

These flyers and factsheets were made available to a wide audience by posting them to the Town's stormwater public education web page.

Message Date(s): Permit Year 7

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: Industrial Facility Outreach**

Message Description and Distribution Method:

The Town developed and maintained a factsheet on their stormwater public education webpage (<https://salemnh.gov/484/Public-Education-Outreach>) targeting industrial facilities with information about material handling and storage, equipment maintenance and cleaning, and other activities at industrial facilities.

Targeted Audience: Industrial facilities

Responsible Department/Parties: Engineering

Measurable Goal(s):

This flyer was made available to a wide audience by posting them to the Town's stormwater public education web page.

Message Date(s): Permit Year 7

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: Stormwater Flyer (Website)**

Message Description and Distribution Method:

The Town maintained an EPA "Protecting Water Quality from Urban Runoff" flyer on their stormwater public education webpage (<https://salemnh.gov/484/Public-Education-Outreach>).

Targeted Audience: Residents, Businesses, institutions and commercial facilities, Developers (construction), Ir

Responsible Department/Parties: Engineering Division

Measurable Goal(s):

This flyer was made available to a wide audience by posting them to the Town's stormwater public education web page.

Message Date(s): Permit Year 7

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 their SWMP to reflect progress made during Permit Year 7 and the Town's SWMP is posted to the Town's website at the link provided on the first page of this report. The Town plans to continue to maintain the SWMP on the Town's website. The Town also posts their Annual Reports to EPA on the Town's website, and also makes their SWMP available at Town Hall and at the DPW Facility.

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 November 16, 2024, and collected 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 Municipal Services Department hosted and participated in a community-wide roadside litter clean-up event in April 2025. As part of the clean-up, paper, cans, bottles, batteries, glass, cardboard, tires, hypodermic needles, car parts, and construction materials were collected and disposed of properly.

The Town continued its mandatory recycling program.

The Town continued to maintain a public works hotline on the Town's website to respond to work order requests.

Residents can drop off their yard waste at the Salem, NH Transfer Station on Shannon Road for processing into compost, with free compost available to residents on a first-come, first-served basis until the pile is gone.

Rain barrels were made available for residents to purchase 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**

Percent of Phase II map complete:

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

As of Permit Year 7, aspects of the Phase II mapping requirements that have been completed to date include mapping of outfall spatial locations, drainage pipes, storm drain manholes, catch basins, and the municipal sanitary sewer system. The Town of Salem does not have any municipally-owned combined sanitary sewers. Initial catchment delineations have been completed, but these delineations have not been refined based on catchment investigations completed to date. This work will be completed by Permit Year 10. The BMP inventory is being evaluated by the Town to identify any unmapped BMPs. The MS4 map will continue to be updated annually as updates are made to existing drainage infrastructure and as new drainage infrastructure is

constructed.

**Screening of Outfalls/Interconnections**

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

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

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

Number of outfalls screened: 19

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

Percent of outfalls screened: 100

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

Dry weather screening of outfalls and interconnections was completed for 100% of the Town's outfalls during Permit Year 3. 19 outfalls were screened during wet weather in Permit Year 7.

As of Permit Year 7, 222 outfalls/interconnections in total have been sampled during wet weather out of the 489 outfalls/interconnections identified as having at least one SVF, or approximately 45%.

**Catchment Investigations**

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

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

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

Number of catchment investigations completed this reporting period: 155

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

Percent of total catchments investigated: 50.3

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

The Town investigated 155 catchments during Permit Year 7. The Town of Salem has 622 NH MS4 Permit regulated outfalls within its jurisdiction. 224 of these outfalls were determined to not have any junction manholes and therefore do not require catchment investigation per Section 2.3.4.8.c.ii.1.c of the 2017 NH MS4 Permit. As of Permit Year 7 (FY2025), 306 of the 398 NH MS4 Permit regulated catchments in Salem

requiring catchment investigations have been screened and cleared, or approximately 76.9%.

As of Permit Year 7, 313 catchments, or 50.3% of all catchments, have been fully completed. Per the Permit, the Town is only reporting that catchment investigations are complete in catchments where outfalls/interconnections have been screened during dry weather, where key junction manholes in these catchments have been screened, and where wet weather sampling has been completed, and where all results indicated no evidence of likely sewer input based on field observations and sampling. Catchment investigation data attached to this report includes all the investigations completed during the reporting period.

**IDDE Progress**

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

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

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

Number of illicit discharges identified:

Number of illicit discharges removed:

Estimated volume of sewage removed:  gallons/day

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

Total number of illicit discharges identified:

Total number of illicit discharges removed:

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

During field investigations, the Town’s Engineering Division discovered a suspected illicit connection where a 6-inch utility pipe presumed to be originating from the Pleasant Street United Methodist Church property located at 8 Pleasant Street is believed to connect to the Town-owned drainage system on Pleasant Street. On October 15, 2024, the Town was provided with access to the 6 Pleasant Street building to perform dye testing of the building’s plumbing fixtures. A dye test of a toilet on the first floor of the building confirmed a direct connection of the building’s sewer service lateral to the catch basin on Pleasant Street. The property owner was notified of the illicit connection on October 24, 2024. The property owner was able to disconnect the sewer service from the drainage system and connect to the sanitary sewer system on November 7, 2024. Follow up dye testing confirmed the repair on November 27, 2024.

The estimated volume of sewage removed for this illicit discharge is 230 gallons/day. The estimate is based on

New Hampshire Department of Environmental Services (NHDES) design flow standards (Env-Wq 704.03) and reflects both pantry operation and baseline facility use.

### **Employee Training**

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

A training on the Town's IDDE program and Good Housekeeping/Pollution Prevention measures, which included SWPPP requirements for the DPW Facility and the Transfer Station, were conducted on June 25, 2025 with 13 municipal employees. This training covered the purpose of the IDDE program, including how to identify illicit discharges and SSOs. It also covered good housekeeping procedures and the impact those procedures have on reducing pollutants in stormwater runoff from municipal activities and facilities.

### **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:

The numbers provided for site plan reviews and inspections cover all projects town-wide, including those projects that disturb less than one acre. 17 verbal enforcement actions were taken during Permit Year 7.

### **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:

The numbers provided for as-builts received covers all projects town-wide, including those projects that disturb less than one acre.

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

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

During Permit Year 4, the Town developed their Street Design and Parking Lot Report, which assessed current street design and parking lot guidelines and other local requirements that affect the creation of impervious cover. Regulatory mechanisms were reviewed to determine if changes to existing design standards could be made to support low impact design options and, where appropriate, proposed recommendations to incorporate policies and standards to minimize impervious cover in parking areas and street designs.

Updates to Chapter 417 of the Town's municipal code, which governs stormwater management, were made during Permit Year 6. These updates were documented as draft at the time the Street Design and Parking Lots Report was prepared.

### **Green Infrastructure Report**

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

During Permit Year 4, the Town developed a Green Infrastructure Report, which assessed existing local regulatory mechanisms to determine the feasibility of making the following practices allowable when appropriate site conditions exist:

- Green roofs
- Infiltration practices such as rain gardens, curb extensions, planter gardens, porous and pervious pavements, and nature-based stormwater management practices
- Water harvesting devices such as rain barrels and cisterns, and the use of stormwater for non-potable uses
- Open space preservation or cluster development practices

Updates to Chapter 417 of the Town's municipal code, which governs stormwater management, were made during Permit Year 6. These updates were documented as draft at the time the Green Infrastructure Report was prepared.

### **Retrofit Properties Inventory**

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

Department of Public Works - 21 Cross Street  
Transfer Station - 101 Shannon Road  
Town Hall - 33 Geremonty Drive  
Police Department - 9 Veterans Memorial Pkwy  
Fire Department - 152 Main Street

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

## 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 continues to work to develop their Catch Basin Cleaning Optimization Plan as new data becomes available. The Town is working to incorporate this year's data to analyze and prioritize cleaning of catch basins where the sumps are filling more quickly to ensure that sumps are never more than 50% full.

### 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 (4) site inspections were completed during the reporting period at the DPW facility and at the Transfer Station for a total of eight (8) inspections. There were minimal corrective actions taken at these facilities.

Improvements were made during Permit Year 7 to temporarily accommodate police forces while a new police station is being built. The Town completed improvements scheduled for the Department of Public Works facility at 21 Cross Street during Permit Year 7. Improvements included upgrading one of the central buildings, adding enclosed truck storage spaces and a new fleet area, removal of interior drains, and installation of a new trench drain with oil/water separator.

### **Additional Information**

#### **Monitoring or Study Results**

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

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

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

#### **Additional Information**

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

During Permit Year 6, the Town received funding under the NHDES Local Source Water Protection Grant Program to move forward with the development of a Nutrient Source Identification Report for Arlington Mill Reservoir. This report was developed and submitted to NHDES in Permit Year 7. The findings from this report will be incorporated into the Arlington Mill Reservoir Watershed-Based Plan, which is planned for Permit Year 8 with funding provided by the NHDES 2024 Clean Water State Revolving Fund (CWSRF).

### **Activities Planned for Next Reporting Period**

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

Yes, I agree

### **Annual Requirements**

- Annual report submitted and available to the public
- Annual opportunity for public participation in review and implementation of SWMP
- Keep records relating to the permit available for 5 years and make available to the public
- Properly store and dispose of catch basin cleanings and street sweepings so they do not discharge to receiving waters
- Annual training to employees involved in IDDE program
- Update inventory of all known locations where SSOs have discharged to the MS4
- Continue public education and outreach program
- Update outfall and interconnection inventory and priority ranking and include data collected in connection with the dry weather screening and other relevant inspections conducted
- Implement IDDE program
- Review site plans of construction sites as part of the construction stormwater runoff control program
- Conduct site inspection of construction sites as necessary
- Inspect and maintain stormwater treatment structures
- Log catch basins cleaned or inspected
- Sweep all curbed streets at least annually
- Continue investigations of catchments associated with Problem Outfalls
- Implemented SWPPPs for all permittee owned or operated maintenance garages, public works yards, transfer stations, and other waste handling facilities
- Review inventory of all permittee owned facilities in the categories of parks and open space, buildings and facilities, and vehicles and equipment; update if necessary
- Review O&M programs for all permittee owned facilities; update if necessary
- Implement all maintenance procedures for permittee owned facilities in accordance with O&M programs
- Implement program for MS4 infrastructure maintenance to reduce the discharge of pollutants
- Enclose all road salt storage piles or facilities and implemented winter road maintenance procedures to minimize the use of road salt
- Review as-built drawings for new and redevelopment to ensure compliance with post construction bylaws, regulations, or regulatory mechanism consistent with permit requirements
- Inspect all permittee owned treatment structures (excluding catch basins)
- Identify additional permittee-owned properties that could potentially be modified or retrofitted with BMPs to reduce impervious areas so that the permittee maintains a minimum of 5 sites in their inventory, until such a time when the permittee has less than 5 sites remaining

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

The Town received funding in Permit Year 6 under the NHDES 2023 Clean Water State Revolving Fund (CWSRF) to complete development of the watershed-based plan for Captains Pond and move forward with the preliminary design of structural BMPs within the Captains Pond Watershed. Work on this project will commenced in Permit Year 8.

The Town also received funding in Permit Year 7 under the NHDES 2024 CWSRF for the development of a

Watershed-Based Plan for Arlington Mill Reservoir. Work on this project is expected to commence in Permit Year 8.

The Town is also in the process of overseeing several additional initiatives which may have stormwater quality benefits. The Town is currently implementing a comprehensive I/I program, which provides an opportunity to identify potential instances where the sanitary sewer could be impacting water quality within the storm drain system. The Town is in the process of replacing multiple culverts that have failed recently. The Town also completes minor drainage improvements as part of their annual road program. This includes drainage repairs, outfall and headwall repairs, and other miscellaneous repairs and maintenance to the drainage system during road paving.

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

### 40 CFR 144.32(d) Certification

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

Name:  Title:

Signature:  Date:

*[Signatory may be a duly authorized representative]*