



DEPARTMENT OF PUBLIC WORKS,
Michael Fowler, P.E., Director
Thomas A. Carrier, Deputy Director

PW10-187

VIA EMAIL: stormwater.reports@epa.gov

April 16, 2010

Glenda Velez
USEPA
5 Post Office Square – OEP06-01
Boston, MA 02109-3912

**RE: NPDES Small MS4 General Permit Number NHR041005
Year 7 Annual Report**

Dear Ms. Velez,

Enclosed please find the Town of Derry's NPDES Small MS4 General Permit Year 7 Annual Report for period of April 1, 2009 through March 31, 2010.

If you have any questions, please contact Craig Durrett or me at (603) 432-6144

Very truly yours,

Michael A. Fowler, P.E.
Director of Public Works

Cc/att: Craig Durrett, Derry Public Works

/csd

Municipality/Organization: Town of Derry, NH

EPA NPDES Permit Number: NHR041005

MaDEP Transmittal Number: W-

Annual Report Number

& Reporting Period: [No. 7: April 1, 2009-March 31, 2010](#)

NPDES PII Small MS4 General Permit Annual Report

Part I. General Information

Contact Person: Michael A. Fowler P.E.

Title: Director of Public Works

Telephone #: (603) 432-6144

Email: mikefowler@ci.derry.nh.us

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, 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.

Signature:

Printed Name: Michael A Fowler P.E.

Title: Director of Public Works

Date: April 15, 2010

Part II. Self-Assessment

General

The Department of Public Works (DPW) is continually making progress on the NPDES Phase II Storm Water Program with the Town of Derry well on its way to improving the quality of its storm water run-off. The Town of Derry continues to implement, encourage, and require the use of Best Management Practices established at the onset of the program, as well as new or revised BMPs throughout the term of the permit. The Town continues to receive support from the residents of Derry since the inception of the program as well as from prospective developers interested in incorporating recommendations from Derry's adopted Stormwater Ordinance. Its principles are being followed and incorporated into projects managed by town, commercial, and private entities. There is a sincere interest and enthusiasm by a diverse group of people in Derry to improve the storm water quality in the water ways and teach others about the importance of eliminating non-point source pollution as expressed in the town-wide meetings for the Master Plan update.

All goals identified in the last permit have been met as of this reporting period. Previously, the Master Plan Update was delayed pending public input. The Master Plan, with the assistance of the UNH Cooperative Extension, was updated with an expected completion date of April 2010. A Community Profile project "Our Town, Our Future" was implemented to promote the community involvement and solicit input. The adopted stormwater and illicit discharge ordinance along with the Beaver Lake Watershed Management Plan are incorporated in the Master Plan by reference.

Due to the extension of the permit renewal by USEPA, all measurable goals and planned activities are subject to change based on the contents and requirements of the new MS4GP. The Town of Derry is once again going through intense budget negotiations and experiencing significant cuts in budgets across all departments. This will have a significant impact on DPW's ability to conduct all planned activities, reach all measurable goals in a timely manner, or be able to meet all additional requirements of the new permit. The Town conducted a comprehensive review of the Draft Permit and provided USEPA with comments and suggestions for incorporation into the new permit.

Illicit Discharges

The Town responded to several illicit discharges during the reporting period.

1. Land clearing and alteration – Two abutting private landowners had a contractor clear and level large area of their property without implementing BMPs for stormwater control, impacting wetlands, and impacting stormwater drainage along a town road. The Town enforced implementation of stormwater BMPs. With assistance from NHDES, further protection and mitigation of impacted wetlands were enforced.
2. Sediment runoff from parking lot expansion – The Town responded to a complaint of sediment runoff into a stream caused by construction associated with the parking lot expansion at the NH Dept of Resource and Economic Development Rail Trail. The Town enforced the implementation of additional BMPs at the construction site entrance as BMPs had been implemented on the site itself.
3. Exceedance of allowed land alteration/stormwater controls – The Town's engineering Department with assistance from NHDES, enforced a violation of land alteration and stormwater regulations at a proposed residential development. The enforcement required mitigation and re-filing of AOT

and NOIs.

4. Dumping of leaves/grass clipping into wetlands/surface water - During a separate inspections in response to public complaint, it was observed that private and commercial entities had been dumping their leaves and grass clippings into wetlands impacting seasonal stream and stormwater runoff/storage. Public Works issued letters to the property owners to discontinue this practice.
5. Fill placement with lack of stormwater controls near wetlands – Public Works responded to several instances of private homeowners placing fill in and adjacent to wetlands and within jurisdiction of Shoreline Protection Act without filing proper permits and/or installation of sediment/erosion control. NHDES assisted with enforcement of a couple the cases.
6. Lack of erosion control – Public Works enforced the use of erosion control BMPs at a single building lot where land clearing was conducted without installation of erosion control and heavy rain impacted the MS4.

Catch Basin Cleaning and Street Sweeping

In the 2009 construction season, 750 catch basins were cleaned. The catch basin cleaning program is set up to schedule higher priority catch basins on a more frequent cleaning schedule. Basins that pick up little debris are cleaned less often. The Town has budgeted to clean an additional 750 catch basins during the next reporting period.

Drain Stenciling

Catch basin stenciling program continued to be very popular with a local Girl Scouts troop. This group stenciled over 100 catch basins with “No Dumping, Drains to Wetlands” or other messages. The Town’s Public Works Department provided the stencils and paint for the event and continues to make it available for any group interested in conducting these activities. The Town has already loaned our storm drain stencils and provided paint to the Beaver lake Improvement Association for their spring storm drain stenciling program.

Public Outreach and Participation

The Town continues to use events such as BLWP meetings, Town-wide Derry Fest, and Derry Doggy Days as a means of outreach to the public. By partnering up with or through open communication with organizations such as BWLP, Conservation Commission, Recreation Department, the town was able to distribute information on stormwater pollution prevention BMPs, household hazardous waste, pet waste management, rain barrels and rain gardening. The town often gives tours of the Town Hall to students and youth groups (cub scouts, girl scouts). During these tours the Director of Public Works and/or Environmental Engineer gives short presentations on the town environmental responsibility and distributes age appropriate literature to participants. These tours and presentations has resulted in groups contacting us in order to participate in storm drain stenciling, and to brain storm on other volunteer opportunities.

Derry remains active in the Manchester area inter-community storm water group with participation in monthly to bimonthly meetings and attendance by NHDES and USEPA representatives.

The Town continues to sponsor Derry Clean Up day during the week of Earth Day and has had broad participation from the public in this program as well. The Beaver Lake Watershed Partnership (BLWP) continues to work diligently within Derry as well as Auburn and Chester to improve water

quality within the Beaver Lake Watershed. Many of the Partnerships goals parallel the goals set for the Town of Derry in our MS4GP, benefiting the Town. Town representatives involved in the partnership meetings throughout the year include the Superintendent of Operations, Community and Economic Development Director, Code Enforcement Officer, Environmental Engineer, and Chairman of the Conservation Commission. Town representatives also conduct outreach to children with presentations on recycling and water pollution at area schools.

The Town is involved in two household hazardous waste collection events per year cosponsored with the Town of Londonderry. Derry conducts an active outreach with public notice and stormwater handouts to Derry residents at our Transfer Station and other town venues. Our aggressive outreach and advertising for the last several events resulted in a significant increase in participation of Derry residents. We plan to continue this approach with scheduled May 2010 event being held in Derry.

Training

One or more Public Works Employees (including the Environmental Engineer, Superintendant of Operations, and Crew Chiefs) participate throughout the year in various training opportunities or live streaming webcasts related to stormwater pollution prevention including the following:

- Salt Education and Reduction Workgroup Meetings, Londonderry (various dates)
- Association of Engineering Geologists 2009 Spring Symposium, Boston College 4/4/09
- 2009 BIA/DES Waste Management Seminar, Manchester, NH (5/5/09)
- NHDES Land Resource management Workshop (3/29/09)

The Town has continued with or is scheduled for training opportunities into the next period with the following:

- NHDES Drinking Water Source Protection Workshop (4/30/09)

During this reporting period, the town gave conditional approval for the first installation of pervious pavement associated with a parking lot expansion at the Overlook Medical Office Park. Approval is based on a stormwater management design based on an absence of pervious pavement in case it should fail due to factors associated with climate or maintenance issues.

1.3	Coordinate information and Program Distribution within School Network	Public Works	Prepare brochures or fact sheets to be distributed to the public by direct mailings. Provide information on the Town's website. Begin developing curriculum to be used to educate students about storm water issues. Contact 50% of the schools located within the Town.	<p>Goals Met: Approximately 4500 residents received direct mailings of Notices of the Household Hazardous Waste Collection events and Stormwater Pollution Prevention which were included with "Drinking Water Consumer Confidence Reports". The Public Works Department continues to distribute informational brochures and fact sheets at the annual "Town Fair" Derryfest. The Town contacts public schools including Pinkerton Academy through their biology department. The Town Environmental Engineer and Recycling Coordinator made presentations to youth groups including Cub Scouts and Girl Scouts, and elementary school students or stormwater and drinking water protection, and recycling.</p>	Conduct additional direct mailings to community water system customers of HHW events and stormwater pollution prevention. Continue to work with the public schools and Pinkerton Academy to distribute information.
Revised					

2. Public Involvement and Participation

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 7 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Next Permit Year
2.1	Create Task Committee	Public Works	Task committee is established. The task committee will be responsible for organizing volunteers, etc., to assist the Town with the implementation requirements for the Phase II Storm Water Program. Document meeting minutes.	Discontinued in previous years. See annual report for 2004-2005. Redundant due to other groups already established.	N/A
Revised	<i>The Town of Derry has determined that a task committee is not necessary to achieve the goals set forth in the Storm Water Management Plan. Therefore, this BMP has been eliminated from the plan.</i>				
2.2	Conduct Public Meeting/Acquire Public Input	Public Works & Town Administration	Public Meeting. Phase II Storm Water Program information to be presented. Document meeting minutes.	Goals Met: Public meeting held on the Storm Water Ordinance and Stormwater System Design Regulations. The Public Works Department continues to encourage public input into the Storm Water Program. As part of the Master Plan Update, several public meetings were held through the Our Town, Our Future Derry Community Profile initiative which solicited public input on issues that included a Natural Resources component.	The Public Works Department will continue to strive to educate the public in storm water. Specific public meetings are not scheduled. Instead public input is solicited through public event displays.
Revised					
2.3	Establish Storm Water Information Display at Major Town Events	Public Works	Phase II Storm Water information display at one town event per year.	Goals Met: This task was completed with a display set up at Derryfest, Derry Doggie Days, and public meetings.	Displays will again be set up at Derryfest and Derry Doggie Days events this year. Youth Groups have also expressed interest in helping with these events for public education as community service projects.
Revised					
2.4	Storm Drain Stenciling/Community Clean-up Day	Public Works	50% of storm drains stenciled using volunteers or school students. Community clean-up day held once a year using volunteers and/or students.	Goals Met: Storm Drain stenciling is periodically conducted by various groups including Girl Scouts and Beaver Lake Improvement Association (BLIA). Numerous groups participate each year in Derry Cleanup Day. Additional interest in these activities are voiced regularly.	The Stenciling program will be an ongoing program as the paint will wear off and need to be touched up. The Town has already provided storm drain stencils and paint to the BLIA for their spring 2010 outreach efforts.
Revised					

3. Illicit Discharge Detection and Elimination

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 7 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Next Permit Year
3.1 Revised	Map Outfalls and Receiving Waters	Public Works & IT Department	Produce a map showing outfalls and receiving waters	Goals Met: The Town of Derry has completed mapping the entire storm water collection system including the outfalls. Follow-up inspection during dry weather conditions continued with remapping and stream cleaning projects.	The Town of Derry will strive to keep the database up to date by adding any new storm water collection systems to the base map. Make any necessary revisions and corrections to the data base as errors or old infrastructure previously missed are discovered.
3.2 Revised	Evaluate Need for Storm Sewer Ordinance; Develop if Necessary	Public Works, through a consultant.	Complete review of existing local regulations and ordinances to determine what mechanisms are already in place. Prepare a Storm Sewer Ordinance for adoption by the Town.	Goals Met: The Derry Town Council adopted the stand-alone Storm Water Ordinance and Stormwater System Design Regulations during a previous reporting period.	Continue to implement and enforce the Storm Water Ordinance and Stormwater System Design Regulations. Prepare revisions if necessary.
3.3 Revised	Train Volunteers in Illicit Discharge Identification	Public Works	Complete a training document. Complete volunteer training for illicit discharge identification. This must include information related to the hazards associated with illegal discharges and improper waste disposal.	Goals Met: The Town uses the illicit discharge report form if/when illicit discharges are identified. to be used by Town employees and volunteers. Any reports that are made to the Code Enforcement Office or Public Works Department are investigated.	Update the Town’s website with information on identifying and reporting illicit discharges. Train and work with the BLIA stream and lake monitoring volunteers on illicit discharge detection.
3.4 Revised	Dry Weather Screening of Outfalls	Public Works	Utilize trained volunteers and/or students to complete dry-weather screening of outfalls. Complete dry-weather screening forms for inspection. Document findings of screening. Identify outfalls requiring further follow-up.	Goals Met: Dry weather screening of outfall continued through 2008. No specific illicit discharges were identified during the screening. However, illegal dumping of lawn waste (grass clipping and leaves) into streams were identified and addressed.	Limited dry weather screening of outfalls will continue, dependent upon availability of funding and other budget constraints. In addition, volunteers working with the Beaver Lake Watershed Partnership are encouraged to become involved in this process.
3.5 Revised	Develop System of Identifying Illicit Discharges and Initiate Program to Eliminate Them	Public Works	Complete Plan outlining system for eliminating illicit discharges. Initiate elimination program. Eliminate the majority of identified illicit discharges.	Goals Met: The Town of Derry utilizes an illicit discharge form to note any potential illicit discharges discovered during catch basin cleaning. Any reports from the public are placed on work orders and investigated by the Environmental Engineer, Supt. of Operations, or the Code Enforcement Officer. Three were identified and reported over the last year.	Continue with existing program and practices of identifying and investigating illicit discharges. Step up enforcement if necessary.

3.6	Identify Magnitude of Effort to Continue Mapping Storm Sewer System.	Public Works	Complete a review of the storm sewer system mapping in Town. Prepare an assessment of the effort required to continue this mapping.	Goals Met: All new additions to the Public Storm Sewer system are added to the Town's Geographic Information System.	Continue updates as required. Due to significant budget constraints for the next year, plans to conduct catchment mapping and delineation over the next year may be postponed for 1 to 2 years. The Town had hoped to complete this effort even though it was not an originally identified and scheduled measurable goal.
Revised					

4. Construction Site Stormwater Runoff Control

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 7 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 5
4.1	Document Existing Programs and Expand Them as Required	Public Works	Complete Review of Existing Local regulations pertaining to construction site runoff control. Complete written summary of existing requirements. This may require additional assessment of potential water quality impacts. Complete necessary additions to existing documents/ordinances for establishing water quality benchmarks, site inspection procedures, etc. Ordinance revisions will be accompanied by appropriate public notice and comment opportunities. The regulations will ultimately address areas of concern noted above.	<p>Goals Met: The Town is routinely checking to verify that an NOI has been submitted to the EPA for all sites over one acre in disturbance. We continue to use a Construction Site Run-off Control Inspection form when inspecting sites through our engineering division to ensure the SWPPP for a construction site is being adhered to.</p>	Continue to be vigilant in the enforcement of construction site erosion control, ensuring SWPPP are present on site and adhered to, continue random cross-checking of CGP NOIs filed against projects in town.
Revised					

5. Post-Construction Stormwater Management in New Development and Redevelopment

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 7 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Next Permit Year
5.1	Document and Enhance Procedures for MS4 Storm Sewer System	Public Works	Complete review of existing MS4 maintenance procedures. Complete formal procedures manual for conducting MS4 maintenance, including record keeping forms, BMPs related to development, etc. Regulations and ordinances will be expanded, as appropriate, to incorporate measures to address the areas of concern noted above.	Goals Met: The Town continues to keep records of the locations and number of catch basins cleaned using its Geographic Information System. The crosschecks the EPA's eNOI database to ensure that NOIs and NOTs have been filed. All site plan review include a review by the Environmental Engineer which includes a focus on construction and post-construction stormwater management.	Continue keeping records on areas cleaned. Upon completion, the Town will develop a schedule based on historical amounts of debris removed from specific catch basins.
Revised					
5.2	Incorporate Best Management Practices into Town Master Plan	Public Works & Planning Department	Complete update of Town's Master Plan to include Best Management Practices.	Goals Met: State and nationally recognized BMPs are included by reference in the Town's storm water ordinance and Storm Water System Design Regulations.	Follow BMPs in Town activities and projects. Make copies of BMPs available to public. Update BMPs as revisions occur.
Revised	<i>The updates to the Town's Master Plan is delayed until 2008-2009 time period. Instead, BMPs will be Incorporated into the draft Storm Water Ordinance currently being revised.</i>		Incorporate BMPs into Storm Water Ordinance and Storm water System Design Regulations.		

6. Pollution Prevention and Good Housekeeping in Municipal Operations

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 7 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Next Permit Year
6.1 Revised	Document and Enhance Employee Training Procedures	Public Works	Complete review of existing training programs. Complete formal employee training manual.	Goals Met: DPW continues to have employees trained and provide employees with informational literature. Lessons learned and training received is transferred to other employees through on the job training and dialogue with employees.	Training and refreshers on SWPPPs, housekeeping, spill response, and erosion control will be conducted periodically as needed.
6.2 Revised	Evaluate the Use of Pesticides, Sand and Salt	Public Works	Complete review of existing procedures. Complete formal procedures manual for handling and use of pesticides, sand, and salt.	Goals Met: Pesticides and herbicide are applied only by licensed applicators for any substantial projects. Fertilizer application on recreational fields is contracted to licensed commercial applicators and are required to use only low phosphorus, slow-release nitrogen fertilizer. The Town has also consulted with the Agricultural Office of the UNH Cooperative Extension in Brentwood to evaluate alternative herbicides and pesticides.	Continue with existing practices. Conduct outreach to public. The Town will continue to look at better technology to reduce the salt and sand usage.

7. BMPs for Meeting Total Maximum Daily Load (TMDL) Waste Load Allocations (WLA) <<if applicable>>

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 7 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Next Permit Year
Revised				<p>The state has developed a chloride TMDL for Beaver Brook. The town has continued its involvement in Salt E'd and Reduction workgroup meetings with NHDES and other stakeholders. As part of our own evaluation, the town initiated a data sharing of chloride monitoring with NHDES. The Town also began preliminary field screening of conductivity in local streams to identify the primary contributors of chloride to surface water in Derry over the past winter.</p>	<p>The town will continue random stream testing of conductivity with periodic chloride analysis. The Town anticipates including chloride use education in its outreach efforts.</p>

7a. Additions

7b. WLA Assessment

Part IV. Summary of Information Collected and Analyzed

Part V. Program Outputs & Accomplishments (OPTIONAL)

Programmatic

Stormwater management position created/staffed	(y/n)	Yes
Annual program budget/expenditures	(\$)	\$70,000 est.

Education, Involvement, and Training

Estimated number of residents reached by education program(s)	(# or %)	20,000 est.
Stormwater management committee established	(y/n)	No
Stream teams established or supported	(# or y/n)	Yes
Shoreline clean-up participation or quantity of shoreline miles cleaned	(y/n or mi.)	Y, ~2 miles
Household Hazardous Waste Collection Days		
▪ days sponsored <i>(Twice/year cosponsored with Town of Londonderry)</i>	(#)	2
▪ community participation <i>(estimate 300 Derry households represented)</i>	(%)	(see comment)
▪ material collected	(tons or gal)	Unknown
School curricula implemented	(y/n)	Yes

Legal/Regulatory

	In Place Prior to Phase II	Under Review	Drafted	Adopted
Regulatory Mechanism Status (indicate with "X")				
▪ Illicit Discharge Detection & Elimination				X
▪ Erosion & Sediment Control	X			X

▪ Post-Development Stormwater Management	X			X
Accompanying Regulation Status (indicate with “X”)				
▪ Illicit Discharge Detection & Elimination				X
▪ Erosion & Sediment Control	X			X
▪ Post-Development Stormwater Management	X			X

Mapping and Illicit Discharges

Outfall mapping complete	(%)	100%
Estimated or actual number of outfalls	(*Includes road crossings)	(#) 1289*
System-Wide mapping complete	(%)	100%
Mapping method(s)		
▪ Paper/Mylar	(%)	
▪ CADD	(%)	100%
▪ GIS	(%)	100%
Outfalls inspected/screened	(# or %)	50%
Illicit discharges identified	(#)	
Illicit connections removed	(#) (est. gpd)	
% of population on sewer	(%)	~50%
% of population on septic systems	(%)	~50%

Construction

Number of construction starts (>1-acre)	(#)	9
Estimated percentage of construction starts adequately regulated for erosion and sediment control	(%)	100%
Site inspections completed	(# or %)	100%
Tickets/Stop work orders issued	(# or %)	0
Fines collected	(# and \$)	0
Complaints/concerns received from public <i>(*Specific to stormwater, erosion, or sediment control on sites > 1-acre)</i>	(#)	6*

Post-Development Stormwater Management

Estimated percentage of development/redevelopment projects adequately regulated for post-construction stormwater control	(%)	100%
Site inspections completed	(# or %)	100%
Estimated volume of stormwater recharged	(gpy)	Unknown

Operations and Maintenance

Average frequency of catch basin cleaning (non-commercial/non-arterial streets)	(times/yr)	Once/4yrs
Average frequency of catch basin cleaning (commercial/arterial or other critical streets)	(times/yr)	Once/yr
Total number of structures cleaned	(#)	750 (this period)*
Storm drain cleaned	(LF or mi.)	unknown
Qty. of screenings/debris removed from storm sewer infrastructure <i>(*estimated)</i>	(tons)	500*
Disposal or use of sweepings (landfill, POTW, compost, recycle for sand, beneficial use, etc.)		Beneficial use
Cost of screenings disposal	(\$)	Unknown

Average frequency of street sweeping (non-commercial/non-arterial streets)	(times/yr)	1/year
Average frequency of street sweeping (commercial/arterial or other critical streets) <i>(weekly April-Nov.)</i>	(times/yr)	35/year
Qty. of sand/debris collected by sweeping (*estimated)	(tons)	750
Disposal of sweepings (landfill, POTW, compost, beneficial use, etc.)	(location)	Beneficial use
Cost of sweepings disposal	(\$)	unknown
Vacuum street sweepers purchased/leased	(#)	0
Vacuum street sweepers specified in contracts	(y/n)	n
Mechanical street sweepers contracted out		

Reduction in application on public land of: (“N/A” = never used; “100%” = elimination)		
▪ Fertilizers (Commercial application to recreational/athletic fields)	(lbs. or %)	Unknown
▪ Herbicides (mandatory by NHDES-Commercial application on waste water lagoons embankment)	(lbs. or %)	Unknown
▪ Pesticides	(lbs. or %)	Unknown

Anti-/De-Icing products and ratios (*Average for season based on total purchased. Actual rations vary based on weather conditions.)	(3500 Tons)	% NaCl % CaCl ₂ % MgCl ₂ % CMA % Kac % KCl	72%*
	(1000 Tons)	% Sand	28%*
Pre-wetting techniques utilized	(y/n)		No
Manual control spreaders used	(y/n)		Yes (12)
Automatic or Zero-velocity spreaders used	(y/n)		Yes (2)
Estimated net reduction in typical year salt application	(lbs. or %)		None
Salt pile(s) covered in storage shed(s)	(y/n)		Yes
Storage shed(s) in design or under construction *New storage and loading facility completed	(y/n)		N*