

Year 1 Annual Report
New Hampshire Small MS4 General Permit
Reporting Period: May 1, 2018-June 30, 2019

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.

Part I: Contact Information

Name of Municipality or Organization: Town of Windham, NH

EPA NPDES Permit Number: NHR041035

Primary MS4 Program Manager Contact Information

Name: David Sullivan

Title: Town Administrator

Street Address Line 1: 4 North Lowell Road

Street Address Line 2: na

City: Windham

State: NH

Zip Code: 03087

Email: townadmin@windhamnh.gov

Phone Number: (603)432-7732

Fax Number: na

Stormwater Management Program (SWMP) Information

SWMP Location (web address): <https://www.windhamnh.gov/DocumentCenter/View/6385/Stormwater-Management-Plan---June-28-2019>

Date SWMP was Last Updated: Jun 28, 2019

If the SWMP is not available on the web please provide the physical address and an explanation of why it is not posted on the web:

Part II: Self Assessment

First, in the box below, select the impairment(s) and/or TMDL(s) that are applicable to your MS4.

Impairment(s)

- ☒ Bacteria/Pathogens
 ☒ Chloride
 ☐ Nitrogen
 ☒ Phosphorus
- ☒ Solids/ Oil/ Grease (Hydrocarbons)/ Metals

TMDL(s)

- ☒ Bacteria/ Pathogens
 ☒ Chloride
 ☐ 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 1 Requirements

- ☒ Develop and begin public education and outreach program
- ☐ Identify and develop inventory of all known locations where SSOs have discharged to the MS4 in the last 5 years
 - ☐ The SSO inventory is attached to the email submission
 - ☐ The SSO inventory can be found at the following website:
- ☒ Develop written IDDE plan including a procedure for screening and sampling outfalls
- ☐ IDDE ordinance complete
- ☒ Identify each outfall and interconnection discharging from MS4, classify into the relevant category, and priority rank each catchment for investigation
 - ☐ The priority ranking of outfalls/interconnections is attached to the email submission
 - ☒ The priority ranking of outfalls/interconnections can be found at the following website:

<https://www.windhamnh.gov/DocumentCenter/View/6384/IDDE-Plan>
- ☐ Construction/ Erosion and Sediment Control (ESC) ordinance complete
- ☐ Develop written procedures for site inspections and enforcement of sediment and erosion control measures
- ☒ Develop written procedures for site plan review
- ☒ Keep a log of catch basins cleaned or inspected
- ☒ Complete inspection of all stormwater treatment structures

Annual Requirements

- ☒ Annual opportunity for public participation in review and implementation of SWMP
- ☒ Comply with State Public Notice requirements
- ☒ 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
- ☒ All curbed roadways have been swept a minimum of one time per year

Bacteria/ Pathogens (Combination of Impaired Waters Requirements and TMDL Requirements as Applicable)Annual Requirements*Public Education and Outreach**

- ☒ Annual message encouraging the proper management of pet waste, including noting any existing ordinances where appropriate
- ☒ Permittee or its agents disseminate educational material to dog owners at the time of issuance or renewal of dog license, or other appropriate time
- ☐ Provide 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)*

Chloride ImpairmentAnnual Requirements*Public Education and Outreach*

- ☐ Include an annual message in November/ December to private road salt applicators and commercial industrial site owners on the proper storage and application rates of winter deicing material, along with the steps that can be taken to minimize salt use and protect local waterbodies

Phosphorus ImpairmentAnnual Requirements*Public Education and Outreach**

- ☒ Distribute an annual message in the spring (April/May) that encourages the proper use and disposal of grass clippings and encourages the proper use of slow-release and phosphorus-free fertilizers
- ☒ Distribute an annual message in the summer (June/July) encouraging the proper management of pet waste, including noting any existing ordinances where appropriate
- ☐ Distribute 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

- ☐ Increase street sweeping frequency of all municipal owned streets and parking lots subject to Permit part 2.3.7.1.d.iii to a minimum of two times per year (spring and fall)

Potential structural BMPs

Any structural BMPs listed in Attachment 3 to Appendix F already existing or installed in the regulated area by the permittee or its agents shall be tracked and the permittee shall estimate the phosphorus

- ☐ removal by the BMP consistent with Attachment 1 to Appendix H. Document 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 in each annual report

Solids, Oil and Grease (Hydrocarbons), or Metals Impairments

Annual Requirements

Good Housekeeping and Pollution Prevention for Permittee Owned Operations

- ☐ Increase street sweeping frequency of all municipal owned streets and parking lots to a schedule to target areas with potential for high pollutant loads
- Prioritize inspection and maintenance for catch basins to ensure that no sump shall be more than 50
- ☒ percent full; Clean catch basins more frequently if inspection and maintenance activities indicate excessive sediment or debris loadings

Chloride TMDL

Complete a Chloride Reduction Plan that includes specific actions designated to achieve chloride

- ☒ reduction on municipal roads and facilities, and on private facilities that drain to the MS4 or complete an Alternative Chloride Reduction Plan

Use the box below to input additional details on any unchecked boxes above or any additional information you would like to share as part of your self assessment:

Year One Requirements:

SSO Box - The Town has no Municipal Sanitary Sewage so therefore the box is left blank

IDDE ORDINANCE Box - the Town adopted a Stormwater Management Ordinance several years ago that gives it the authority to address IDDE's and ensure correction and compliance. We are looking at either amending the current Ordinance or proposing a new Ordinance in the future.

CONSTRUCTION / EROSION AND SEDIMENT CONTROL (ESC) ORDINANCE - an ordinance was approved by the Planning Board effective September 4, 2019

WRITTEN PROCEDURES FOR SITE INVESTIGATIONS AND ENFORCEMENT OF SEDIMENT AND EROSION CONTROL MEASURES - approved by the Planning Board as part of the Ordinance approved above effective September 4, 2019

BACTERIA / PATHOGENS -

Permittee disseminate educational material to dog owners at time of issuance or renewal of licenses - Town distributed annual message to pet owners during our 2019 Annual Town Meeting in March as well as handed out pamphlets at our Transfer Station and at our local veterinarian offices. We plan to hand out these pamphlets from our Town Clerk office at time of license renewals in the future.

SEPTIC SYSTEM NOTICES - Flyers were not sent out during this reporting period. Town anticipates doing so in the fall of 2019

CHLORIDE IMPAIRMENT - to be completed in Nov / Dec 2019

PHOSPHEROUS IMPAIRMENT -

LEAF LITTER - Pamphlets will be distributed at our Transfer Station this Fall 2019

GOOD HOUSEKEEPING - INCREASE STREET SWEEPING FREQUENCY - Not applicable during this reporting period - no known target areas

POTENTIAL STRUCTURAL BMPs - Not applicable during this reporting period

SOLIDS, OILS, GREASES - INCREASE STREET SWEEPING - Not applicable during this reporting period - no known target areas

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:

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 the reporting period: 5

Below, report on the educational messages completed during the first year. For the measurable goal(s) please describe the method/measures used to assess the overall effectiveness of the educational program.

BMP: DO YOUR PART - BE SEPTIC SMART

Message Description and Distribution Method:

DO YOUR PART - BE SEPTIC SMART - a simple guide to the proper care and maintenance of your septic system. It was handed out as well as put on the Stormwater page of the Town Website. The brochure can be viewed at the following website link:

https://www.windhamnh.gov/DocumentCenter/View/6265/Septic_Smart_Flyer_Windham

Targeted Audience: Residents

Responsible Department/Parties: Community Development Department Staff and Transfer Station Staff

Measurable Goal(s):

Handed out approximately 500 pamphlets at the Town Transfer Station to residents as well as additional ones to those attending our annual Town Meeting in March 2019. Also pamphlet was posted on the Stormwater page on the Town's Website.

Message Date(s): March 2019 as well as April 2019

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: WHAT'S IN YOUR WATER

Message Description and Distribution Method:

WHATS IN YOUR WATER - Pamphlet on how to properly test your water

It was handed out as well as put on the Stormwater page of the Town Website. The brochure can be viewed at the following website link:

https://www.windhamnh.gov/DocumentCenter/View/6271/Well_Water_Flyer_Windham

Targeted Audience: Residential

Responsible Department/Parties: Community Development Staff

Measurable Goal(s):

Handed out approximately 75 pamphlets to those attending our annual Town Meeting in March 2019 as well as talking with many more people about the subject, but who elected not to take a pamphlet with them. Also, the pamphlet was posted on the Stormwater page on the Town's Website.

Message Date(s): March 2019

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:

This was an added message we decided to put out in addition to those others planned

BMP: PICK UP AFTER YOUR PET

Message Description and Distribution Method:

PICK UP AFTER OUR PET - Pet Waste Pamphlet -

It was handed out as well as put on the Stormwater page of the Town Website. The brochure can be viewed at the following website link:

https://www.windhamnh.gov/DocumentCenter/View/6264/Pet_Waste_Flyer_Windham

Targeted Audience: Residential / Business

Responsible Department/Parties: Community Development Staff and Transfer Station Staff

Measurable Goal(s):

Handed out approximately 500 pamphlets at the Town Transfer Station to residents as well as additional ones to those attending our annual Town Meeting in March 2019. Pamphlet was also posted on the Stormwater page on the Town's Website.

In addition staff met with five (5) veterinary hospitals and two (2) dog care facilities in town and distributed the pamphlet so that they could share same with their customers

Message Date(s): March 2019 and April 2019

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: GREEN GRASS CLEAR WATER

Message Description and Distribution Method:

GREEN GRASS CLEAR WATER - an environmentally lawn care pamphlet - It was handed out and posted on the Town Website at:

<http://www.windhamnh.gov/DocumentCenter/View/6409/Green-Grass-Clean-Water-Flyer>

Targeted Audience: Residential

Responsible Department/Parties: Community Development Staff and Transfer Station Staff

Measurable Goal(s):

Handled out approximately 500 pamphlets at the Town Transfer Station to residents as well as additional ones to those attending our annual Town Meeting in March 2019. It was also posted on the Town website but after the reporting period.

Message Date(s): March 2019 and April 2019

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: GREEN GRASS CLEAR WATER

Message Description and Distribution Method:

GREEN GRASS CLEAR WATER - an environmentally lawn care pamphlet - It was handed out and posted on the Town Website at:

<http://www.windhamnh.gov/DocumentCenter/View/6409/Green-Grass-Clean-Water-Flyer>

Targeted Audience: Businesses

Responsible Department/Parties: Community Development Staff

Measurable Goal(s):

Staff visited the five (5) landscaping companies located in town and provided information on the Town's Stormwater Program, including distributing the Green Grass pamphlet.

Message Date(s): April 2019 and May 2019

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 the reporting period:

Staff discussed the development of the SWMP at several Board of Selectmen meetings which are open to the public and are cable-casted on local TV.

In addition we maintain a town website page on Stormwater which urges residents to get involved and we post our meeting minutes as well as documents related to the SWMP and other Stormwater related matters.

The webpage link is at <https://www.windhamnh.gov/450/Stormwater-Management>

Was this opportunity different than what was proposed in your NOI? Yes ☐ No ☒

Describe any other public involvement or participation opportunities conducted during the reporting period:

Along with discussions at Board of Selectmen's meetings, staff held 17 committee meetings to discuss Stormwater. Copies of the minutes from such meetings can be found at:

<https://www.windhamnh.gov/AgendaCenter/Stormwater-Management-Committee-25>

Additionally staff met with the Windham Garden Club and presented a program on the Town's Stormwater Program on March 21, 2019

MCM3: Illicit Discharge Detection and Elimination (IDDE)

Sanitary Sewer Overflows (SSOs)

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:

Below, report on the total number of SSOs identified in the MS4 system and removed to date. At a minimum, report SSOs identified since 2013.

Total number of SSOs identified:

Total number of SSOs removed: 0

MS4 System Mapping

Describe the status of your MS4 map, including any progress made during the reporting period:

The MS4 map was updated to reflect the current boundaries of the MS4 within the Town. The current MS4 area can be found on the town website at:

<https://www.windhamnh.gov/DocumentCenter/View/6406/Automatically-Designated-MS4-Areas>

Additionally all known outfalls were mapped and thirty-seven (37) catchment areas were identified throughout the town and mapped. The catchment area map can be found on the town website at:

<https://www.windhamnh.gov/DocumentCenter/View/6407/Catchment-Area-Map>

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.

- ☐ The outfall screening data is attached to the email submission
- ☐ The outfall screening data can be found at the following website:

The Town had not begun monitoring outfalls during this reporting period

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

Number of outfalls screened: 0

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

Percent of total outfalls screened: 0

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.

- ☐ The catchment investigation data is attached to the email submission
- ☐ The catchment investigation data can be found at the following website:

No catchment investigation have begun during this reporting round

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

Number of catchment investigations completed this reporting period: 0

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

Percent of total catchments investigated: 0

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

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.

- ☒ 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:

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.

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 the reporting period:

The town conducted employee training of the Stormwater Committee members on the development of the IDDE and SWMP as the two were being developed to ensure the employees understood their responsibilities regarding the two new documents. The Committee met 17 times during this reporting period - during these meetings knowledge was provided to the group as to the overall Stormwater Program.

Committee members also attended several monthly meetings of the Nashua-Manchester Regional Stormwater Coalition.

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: 22

Number of inspections completed: 210

Number of enforcement actions taken: 10

MCM5: Post-Construction Stormwater Management in New Development and Redevelopment**Ordinance Development**

Describe the status of the post-construction ordinance required to be complete in year 2 of the permit term:

THE DEVELOPMENT OF THIS ORDINANCE HAD NOT BEEN STARTED DURING THIS REPORTING PERIOD

As-built Drawings

Describe the status of the measures the MS4 has utilized to require the submission of as-built drawings and ensure long term operation and maintenance of completed construction sites required to be complete in year 2 of the permit term:

THE TOWN HAS BEGUN RECEIVING AS-BUILT DRAWING

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:

NO ACTION HAS BEEN TAKEN ON THIS MEASURE DURING THE REPORTING PERIOD

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 DEVELOPMENT OF THIS HAS NOT BEEN STARTED DURING THIS REPORTING PERIOD

Retrofit Properties Inventory

Describe the status of the inventory, due in year 4 of the permit term, of permittee-owned properties that could be modified or retrofitted with BMPs to mitigate impervious areas and report on any properties that have been modified or retrofitted:

THE DEVELOPMENT OF THIS HAS NOT BEEN STARTED DURING THIS REPORTING PERIOD

MCM6: Good Housekeeping**Catch Basin Cleaning**

Describe the status of the catch basin cleaning optimization plan:

The Town continues to clean its catch basins on an annual basis such that every catch basin is cleaned at least c



If complete, attach the catch basin cleaning optimization plan or the schedule to gather information to develop the optimization plan:

- ☐ The catch basin cleaning optimization plan or schedule is attached to the email submission
- ☐ The catch basin cleaning optimization plan or schedule can be found at the following website:

NOT APPLICABLE DURING THIS REPORTING PERIOD

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: 900

Number of catch basins cleaned: 819

Total volume or mass of material removed from all catch basins: 150 yards [UNITS]

Below, report on the total number of catch basins in the MS4 system, if known.

Total number of catch basins: 1250+/-

If applicable:

Report on the actions taken if a catch basin sump is more than 50% full during two consecutive routine inspections/cleaning events:

NOT APPLICABLE

Street Sweeping

Describe the status of the written procedures for sweeping streets and municipal-owned lots:

The Town has a written procedure for sweeping streets and lots - this document can found on the town website at:

<https://www.windhamnh.gov/DocumentCenter/View/6410/Street-Sweeping-Procedure>

Report on street sweeping completed during the reporting period using one of the three metrics below.

☒ Number of miles cleaned: 100

☐ Volume of material removed: [UNITS]

☐ Weight of material removed: [UNITS]

Winter Road Maintenance

Describe the status of the written procedures for winter road maintenance including the storage of salt and sand:

The Town has adopted a Winter Operations Policy: Snow and Ice Removal Procedures which can be found on the Town website at:

<https://www.windhamnh.gov/DocumentCenter/View/612>

Inventory of Permittee-Owned Properties

Describe the status of the inventory, due in year 2 of the permit term, of permittee-owned properties, including parks and open spaces, buildings and facilities, and vehicles and equipment, and include any updates:

NOT STARTED AS OF THIS REPORTING PERIOD

O&M Procedures for Parks and Open Spaces, Buildings and Facilities, and Vehicles and Equipment

Describe the status of the operation and maintenance procedures, due in year 2 of the permit term, of permittee-owned properties (parks and open spaces, buildings and facilities, vehicles and equipment) and include maintenance activities associated with each:

NOT STARTED AS OF THIS REPORTING PERIOD

Stormwater Pollution Prevention Plan (SWPPP)

Describe the status of any SWPPP, due in year 2 of the permit term, for permittee-owned or operated facilities including maintenance garages, public works yards, transfer stations, and other waste handling facilities where pollutants are exposed to stormwater:

The Town has completed an updated SWPPP for its Transfer Station.

Below, report on the number of site inspections for facilities that require a SWPPP completed during this reporting period.

Number of site inspections completed: 2

Describe any corrective actions taken at a facility with a SWPPP:

None needed

O&M Procedures for Stormwater Treatment Structures

Describe the status of the written procedure for stormwater treatment structure maintenance:

While actions are taken to review structures, particularly during cleaning of catch basins, a formal written procedure has not been completed as of this reporting period. In the field we inspect basins for damaged cement work, broken or missing bricks or barrel blocks; we also review the condition of pipe(s), look for any illicit discharges through visual inspection, and any visible pipe blockage.

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:

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 2 requirements summarized below. (Note: impaired waters and TMDL requirements are not listed below)

Yes, I agree ☒

- Complete system mapping Phase I
- Begin investigations of catchments associated with Problem Outfalls
- Develop or modify an ordinance or other regulatory mechanism for post-construction stormwater runoff from new development and redevelopment
- Establish and implement written procedures to require the submission of as-built drawings no later than two years after the completion of construction projects
- Develop, if not already developed, written operations and maintenance procedures
- Develop an inventory of all permittee owned facilities in the categories of parks and open space, buildings and facilities, and vehicles and equipment; review annually and update as necessary
- Establish a written program detailing the activities and procedures the permittee will implement so that the MS4 infrastructure is maintained in a timely manner
- Develop and implement a written SWPPP for maintenance garages, public works yards, transfer stations, and other waste handling facilities where pollutants are exposed to stormwater
- Enclose or cover storage piles of salt or piles containing salt used for deicing or other purposes
- Develop, if not already developed, written procedures for sweeping streets and municipal-owned lots
- Develop, if not already developed, written procedures for winter road maintenance including storage of salt and sand
- Develop, if not already developed, a schedule for catch basin cleaning
- Develop, if not already developed, a written procedure for stormwater treatment structure maintenance
- Develop a written catchment investigation procedure (18 months)

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 in the last 5 years
- Continue public education and outreach program
- Implement procedures for sweeping streets and municipal-owned lots
- Implement procedures for winter road maintenance
- 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 uncurbed streets at least annually

Provide any additional details on activities planned for permit year 2 below:

Part V: Certification of Small MS4 Annual Report 2019**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.

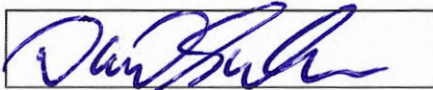
Name:

David Sullivan

Title:

Town Administrator

Signature:



Date:

09/26/19

[Signatory may be a duly authorized representative]