

Year 6 Annual Report

New Hampshire Small MS4 General Permit

NEW PERMITTEES

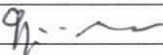
Reporting Period: July 1, 2023 - June 30, 2024

Wilton

EPA NPDES Permit Number NHR041044

Certification of Small MS4 Year 6 Annual Report

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

Printed Name:	Nicholas Germain
Title:	Town Administrator
Signature:	 Date: 9/30/2024

Authorized Representative:

The authorization letter is:

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

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☒ Publicly available at the website:

https://www.wiltonnh.gov/government/stormwater_management

Primary MS4 Program Manager Contact Information:

Name:	Nicholas Germian	Title/Position:	Town Administrator
Department:	Administration		
Street Address:	42 Main Street		
City:	Wilton	State:	New Hampshire
		Zip Code:	03086
Email:	wiltonta@wiltonnh.gov	Phone Number:	603-654-9160

SWMP:

<https://cdnsm5->

[hosted.civiclive.com/UserFiles/Servers/Server_13599840/File/Government/MS4%20Stormwater/SWMP%20Draft%202023%20draft%209.15.23.pdf](https://cdnsm5-hosted.civiclive.com/UserFiles/Servers/Server_13599840/File/Government/MS4%20Stormwater/SWMP%20Draft%202023%20draft%209.15.23.pdf)

Date SWMP was Last Updated: September 2023; internal review for 2024 update in progress

IDDE Program Plan: <https://cdnsm5->

[hosted.civiclive.com/UserFiles/Servers/Server_13599840/File/Government/MS4%20Stormwater/IDDE%202024%20plan.pdf](https://cdnsm5-hosted.civiclive.com/UserFiles/Servers/Server_13599840/File/Government/MS4%20Stormwater/IDDE%202024%20plan.pdf)

Updated System Map: System map is digitized and can be fully viewed at the Wilton Town offices at 42 Main Street in Wilton, NH, or shared with appropriately familiar GIS users. Images of the map are contained within the IDDE Plan

Progress on Completion of System Map: See IDDE Plan for pictures of Asset Map. System map is digitized and can be fully viewed at the Wilton Town offices at 42 Main Street in Wilton, NH, or shared with appropriately familiar GIS users upon request. Map has some gaps that don't show connections between known infrastructure, but essential MS4 area infrastructure has been accurately mapped.

Updated SSO Inventory: N/A – still none to report as of yet.

Updated Inventory and Ranking of Outfalls/Interconnections:

https://www.wiltonnh.gov/government/stormwater_management -> (see right hand link titled [Preliminary Outfall Priority Rankings spreadsheet](#))

Dry Weather Screening Data:

https://www.wiltonnh.gov/government/stormwater_management/water_sampling_reports

Wet Weather Screening Data:

https://www.wiltonnh.gov/government/stormwater_management/water_sampling_reports

Catchment Investigation Data: N/A

System Vulnerability Factors:

<https://cdnsm5->

[hosted.civiclive.com/UserFiles/Servers/Server_13599840/File/Government/MS4%20Stormwater/Draft%20Wilton%20Catchment%20Investigation%20Procedure.pdf](https://cdnsm5-hosted.civiclive.com/UserFiles/Servers/Server_13599840/File/Government/MS4%20Stormwater/Draft%20Wilton%20Catchment%20Investigation%20Procedure.pdf)

Illicit Discharge Removal Report:

https://www.wiltonnh.gov/government/stormwater_management

Incident 23-01

https://www.wiltonnh.gov/UserFiles/Servers/Server_13599840/File/Government/MS4%20Stormwater/Stormwater%20Incidnet%2023-01.pdf

Incident 23-02

https://www.wiltonnh.gov/UserFiles/Servers/Server_13599840/File/Government/MS4%20Stormwater/Stormwater%20Incidnet%2023-02.pdf

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

https://www.wiltonnh.gov/government/stormwater_management/water_sampling_reports

Small MS4 Authorization

The following annual report, which serves as a self-assessment, is intended to document the activities undertaken over the **reporting period from July 1, 2023, through June 30, 2024**, in accordance with the Permit.

The Notice of Intent (NOI) can be found at the following (document name or web address):

<https://www.epa.gov/npdes-permits/regulated-ms4-new-hampshire-communities>

Compliance activities have been identified and described in the Wilton's Stormwater Management Program Plan (SWMP) and Illicit Discharge Detection and Elimination (IDDE) Plan. Those documents and other pertinent Year 6 information can be found in submission or at the following websites, and will be referred to throughout this report:

PTAP 2024 Nutrient Reduction Report: N/A

Salt Reduction Plan: n/a

Annual Salt Usage Report n/a

Nitrogen Source Identification Report: N/A
PTAP 2024 Nutrient Reduction Report: N/A
Wilton Nutrient Tracking Program Report: N/A

Phosphorus Source Identification Report: N/A
PTAP 2024 Nutrient Reduction Report: N/A
Wilton Nutrient Tracking Program Report: N/A

Street Sweeping Schedule:

https://www.wiltonnh.gov/UserFiles/Servers/Server_13599840/File/Government/MS4%20Stormwater/2024%20Street%20Sweeping%20and%20Catch%20Basin%20Cleaning%20Report.pdf

Chloride Reduction Plan: N/A
Annual Salt Usage Report N/A

Lake Phosphorus Control Plan: N/A
PTAP 2024 Nutrient Reduction Report: N/A
Wilton Nutrient Tracking Program Report: N/A

Self-Assessment

Select the impairment(s) and/or TMDL(s) that are applicable to your MS4. Make sure you are referring to the [2020/2022 EPA approved Section 303\(d\) Impaired Waters List](#) which was used for the Year 6 reporting period and can be found on the [New Hampshire Department of Environmental Services \(NHDES\) webpage](#).

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

Impairment(s)

☒ Bacteria/Pathogens

☐ Chloride

☐ Nitrogen

☒ Phosphorus

☐ Solids/Oil/Grease (Hydrocarbons)/Metals

TMDL(s)

☒ Bacteria and Pathogens

☐ Chloride

☐ Lake and Pond Phosphorus

Receiving Waters/Impaired Waters/TMDL

Have there been any changes to your lists of **receiving waters or impairments** since the NOI was submitted?

☒ Yes

Changes have been made to the lists of receiving waters or impairments since the NOI submission. The following **impairments and/or TMDLs** have been added or delisted:

Water Quality Impaired Waters: (Added)

NHRIV700060902-05	SOUHEGAN RIVER - TUCKER BROOK	WILTON	Aquatic Life Integrity	Phosphorus (Total)	4B-T
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TMDL: No Change.

☐ No

There have been no changes to the lists of **receiving waters or impairments** since the NOI submission.

Have there been any changes to your **list of outfalls** since the NOI was submitted?

☐ Yes

Changes have been made to the **list of outfalls** since the NOI submission.

A total of 0 outfall(s) have added.

A total of 0 outfall(s) have removed.

☐ No

Wilton has not made changes to the **list of outfalls** since the NOI submission.

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

*Wilton was assigned a Phosphorous impairment in 2022. This is for a river segment within the town of Wilton, but not directly contiguous with the main impaired waterbody complex of the Souhegan and Stony Brook relevant to the town's original and expanded stormwater area.

*Wilton has had all its known outfalls in the original stormwater area mapped for several years.

Minimum Control Measures

MCM 1: Public Education

Total number of all MS4 related educational efforts completed *during this reporting period*: 7

Were any of the messages below different than what was proposed in your NOI?

☐ No

☒ Yes. Wilton made changes due to massive staff and personnel change over; personnel who initially created the NOI likely only had a limited understanding of the scope of MS4 obligations required by permitting authority.

BMP: Grass and Fertilizer

Outreach Resources:

Grass and fertilizer related flyers, mailers, postcards, videos and social media posts found on the [MCM #1 webpage](#) of the NH MS4 website.

Description:

Distribution and promotion of “Green Grass and Clean Water” **and** municipally created UNH Yard Fertilizer Handling Packets (Includes calculation instructions). Occurred at the Town Hall passively and at a display at the 2024 Town Meeting.

Targeted Audience:

Residential **and** Business and Institutions

Responsible Department/Parties:

Administration

Measurable Goal(s):

Residents that are lawn care enthusiasts understand the potential water quality impacts from fertilizer and improper disposal of grass clippings and are aware of the proper lawn care management techniques for reducing those impacts. Measurement includes quantity of materials distributed.

Following are the number of flyers, mailers, **and** postcards that were distributed *during this reporting period*:

Year 6 = 15 Green Grass Clear Water flyers distributed throughout the year

7 UNH Grass and Fertilizer packets distributed throughout the year

Goal was achieved.

BMP: Pet Waste Disposal

Outreach Resources:

Pet waste related flyers, mailers, postcards, and videos found on the [MCM #1 webpage](#) of the NH MS4 website.

Description:

Distribution and promotion of “Every Drop” flyers **and** municipally distributed Greenworks Informational Scoop the Poop flyers. Occurred at the Town Hall passively and at a display at the 2024 Town Meeting.

Targeted Audience:

Residents - Pet Owners

Responsible Department/Parties:

Administration

Measurable Goal(s):

Dog owners **and** dog walkers are aware of the potential water quality impacts from pet waste, local pet waste ordinances, and how to dispose of pet waste properly. If pledges are signed, there will be an increase of dog owners committed to picking up pet waste.

Following are the number of flyers, mailers, postcards, **and/or** brochures that were distributed *during this reporting period:*

Year 6 = 3 of the “Every Drop Flyers”

Year 6 = 8 of the Greenworks Scoop the Poop Informational Flyer

Goal was achieved.

BMP: Disposal of Leaf and Grass Clippings

Outreach Resources:

Leaf and grass clippings related flyers, brochures, pledges, door hangers, and videos found on the [MCM #1 webpage](#) of the NH MS4 website.

Description:

Distribution and promotion of municipally created flyers, brochures, pledges, door hangers, and videos with messaging about impacts from yard waste to waterbodies, alternatives to dumping yard waste, and laws against dumping yard waste near or in waterbodies. Occurred at the Town Hall passively and at a display at the 2024 Town Meeting.

Wilton has also implemented a yard waste collection and composting campaign by advertising its year-round yard waste cleanup (leaves and other plant-based material like brush) at its Recycling / Transfer Station during the Fall and Spring yearly. It also advertised UNH Instructional materials for Composting.

Targeted Audience:

Residential **and/or** Business and Institutions

Responsible Department/Parties:

Administration and the Wilton Recycling and Transfer Station

Measurable Goal(s):

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

Following are the number of flyers, brochures, and door hangers that were distributed **during this reporting period:**

Year 6 = 4 of brochures

And

Wilton announced through social media posts in Fall 2023 and Spring 2024 that it was actively collecting yard waste and promoting UNH-approved composting methods. News articles on the front page of Wilton's website in the Spring and Fall 1) Notified the public of yard waste collection at the Wilton Recycling and Transfer Center 2) Promoted and linked to UNH Instructional Materials for Composting 3) Described the town's phosphorous impairment and why yard waste getting into impaired waterbodies and stormwater system causes nutrient load spikes. This article was shadowed by social media posts on Facebook that linked back to the article and advertised the yard waste collection efforts.

Goal was achieved.

Message Date: November 20, 2023 and May 9th 2024 via www.wiltonnh.gov and Official Town of Wilton Facebook page.

BMP: Septic System Maintenance

Outreach Resources:

Septic system related brochures, **and** social media posts found on the [MCM #1 webpage](#) of the NH MS4 website.

Description:

Distribution and promotion of Get Pumped NH, EPA, **and** social media posts educating New Hampshire homeowners with septic systems on how to identify, locate and maintain those systems. Get Pumped NH is a collaborated effort between the New Hampshire Association of Septage Haulers (NHASH) and the NHDES. Get Pumped handouts occurred at the Town Hall passively and at a display at the 2024 Town Meeting.

And

The Town of Wilton participated in the 2023 and 2024 Septic Week Coordinated Social Media Posting campaign. One post occurred in September 2023, and Wilton posted on three days in September 2024 advertising GetPumped messaging coordinated by the state program.

Targeted Audience:

Septic System Owners

Responsible Department/Parties:

Administration

Measurable Goal(s):

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

Following are the number of brochures and letters that were distributed **during this reporting period:**

Year 6 = 8 GetPumped brochures

Goal was achieved.

Message Date: GetPumped social media posts: September 19th 2023 and September 17th, 18th, and 19th in 2024

BMP: Construction/Developers Outreach

Outreach Resources:

Construction/developers related letter and fact sheets found on the [MCM #1 webpage](#) of the NH MS4 website.

Description:

☒ Provide the Construction General Permit (CGP) outreach letter and fact sheets to developers, construction contractors, and other municipal or local organizations to educate them on the EPA 2022 Construction General Permit along with information on the selection, installation, and maintenance of construction related best management practices. The then Building Inspector between March 2024 and July 2024 distributed an unknown number of CGP and BMP factsheets to builders.

Or

☒ Review the construction checklist with developers and construction contractors prior to the beginning of construction projects (pre-construction) to identify responsible parties, erosion control practices, other best management practices, and requirements for the EPA Construction General Permit as appropriate.

Targeted Audience:

Construction/Developers

Responsible Department/Parties:

Administration / Land Use

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.

Following is the number of fact sheets that were distributed to contractors, developers, and municipal or local organizations **during this reporting period:**

Year 6 = 2 of CGP fact sheets (Distributed hand-to-hand by the Stormwater Manager)

Year 6 = 2 of BMP fact sheets (Distributed hand-to-hand by the Stormwater Manager)

The Town of Wilton held 1 pre-construction meetings, representing .02% of projects that received planning board approval and began construction **during this reporting period.**

Goal was achieved.

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

Wilton's staff have historically done informal pre-construction interaction with developers and builders, but in the last two years, this has increased in sophistication, and the Planning Board has now agreed to organize formal pre-construction meetings on large development projects. 1 Occurred in the year 6 reporting period and 1 is currently scheduled in the year 7 reporting period.

MCM 2: Public Participation

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

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

Description:

The Stormwater Management Program (SWMP) was publicly reviewed at an October 2023 Select Board public hearing. A renewed updated SWMP public hearing is planned for fall 2024. Documents and records relating to the permit are retained and available for 5 years to the public at town hall **and the town's stormwater management webpage(s)**

Was this opportunity different than what was proposed in your NOI?

☒ No

☐ Yes

Measurable Goal(s):

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

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

Public involvement or participation opportunities are ancillary to daily operations.

and

Wilton has conducted the following public involvement or participation opportunities:

1. Continued to promote, support, and organize a town wide roadway cleanup campaign that last occurred in April 2024. This included organizing roadway cleanups on 68 miles of town roads. Although a bag count is not possible given current levels of sophistication, there were again hundreds of bags collected. Anecdotally, there was substantially less due to the efforts of past years having a marked effect and the elimination of known illegal dumping sites.
2. Promoted and held a household hazardous waste cleanup day in June 2024
3. Had an extensive discussion about MS4 at the town's 2024 annual town meeting (March 2024). This included discussion of the nature of MS4, its environmental implications, its practical realities for town budgets and taxes, and the successful introduction of a warrant article to take the locally unprecedented effort to create and fund a Wilton Stormwater Management Expendable Trust Fund. The town's stormwater budget also passed, as did

continued financial support for the planning and execution of a new Highway Garage/Public Works facility, which will alleviate legacy problems that can only be mitigated partially at existing site.

MCM 3: Illicit Discharge Detection and Elimination (IDDE)

Sanitary Sewer Overflows (SSOs)

- ☒ This SSO section is NOT applicable because we DO NOT have sanitary sewer.

☐ This SSO section is NOT applicable because we DID NOT find any new SSOs.

☐ The SSO inventory has been updated, including the status of mitigation and corrective measures implemented or was addressed and can be found here:

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

Number of SSOs identified **during this reporting period:** 0

Number of SSOs removed **during this reporting period:** 0

MS4 System Mapping

- ☒ Updated **Phase 1** system map due in Year 2 as necessary:

Provide additional status information regarding your map:

Phase 1 map of storm sewer system and associated outfalls was completed in Year 3 and there have been no updates since that time..

- ☒ Updated **Phase 2** system map (due in Year 13):

Percent of Phase 2 map completed: 0 % of the Phase 2 Mapping is completed as of June 30, 2024.

Screening of Outfalls/Interconnections

Dry Weather Screening

- ☐ No outfalls were inspected for dry weather screening *during this report period*.
- ☒ Outfalls were inspected for dry weather screening *during this report period* and data can be found in submission **and/or** at the following website:
https://www.wiltonnh.gov/government/stormwater_management/water_sampling_reports

Below, report on the number of outfalls screened in the MS4 system:

Number of outfalls/interconnections screened *during this reporting period*: 9

Percent of total known outfalls/interconnections screened *to date (Year 1 – Year 6)*: 100%

The inventory and ranking of outfalls/interconnections was updated in Year 6 and the IDDE Program Plan was revised as a result. The revised inventory and ranking of outfalls/interconnections can be found at the following website:

[https://www.wiltonnh.gov/government/stormwater_management -> Preliminary Outfall Ranking Excel Spreadsheet](https://www.wiltonnh.gov/government/stormwater_management->Preliminary%20Outfall%20Ranking%20Excel%20Spreadsheet)

Wet Weather Screening

*The municipality **must** choose one of the following statements:*

- ☐ No outfalls/interconnections were inspected for wet weather screening *during this report period*.

Or

- ☒ Wet weather outfall/interconnection screening data can be found at the following website
https://www.wiltonnh.gov/government/stormwater_management/water_sampling_reports

The municipality **must** report on the following metrics (if there is nothing to report or if this requirement is not applicable, enter 0):

Number of outfalls/interconnections screened **during this reporting period**: 24

Percent of total known outfalls/interconnections screened **to date (Year 1 – Year 6)**: 100%

Notation: Please note, Wilton's stormwater program has been to every outfall in Dry Weather and Wet Weather, but has been unable to screen for all required parameters. The dry and weather parameters the town has been able to cover for some outfalls include:

- chlorine
- conductivity
- salinity
- E. coli
- temperature, and
- Phosphorous

The town was unable to test for the missing parameters this year for several reasons:

Personnel limitations: The Town still has not been able to develop the capacity to sample outside of the availability of the town's traditional summer intern program. This is in part due to the untimely passing away of a critical member of the town's reconstituted stormwater team in early 2024, Michael Tatro (Wilton's Public Works Director). Michael had been working towards personally becoming more directly involved in Stormwater program management, and had been planning on building the capacity within his department to do the same. His loss was a massive blow to the town in general and in particular its efforts to develop a more sophisticated stormwater program.

Equipment malfunctions: Several of Wilton's YSI probes and add-on equipment malfunctioned or were found to be broken during the town's summer sampling season. This is believed to be due to the fact that the town's YSI machine is nearing the end of its useful life, with some built in probes just no longer working and the vendor recommending alternatives. The Town is exploring whether it would be more cost-effective and efficient to either 1) refurbish/procure a replacement of the same machine 2) Procure a new, updated machine 3) or attempt to rent the necessary equipment from a vendor instead going forward. All routes have merits, but at the moment, Wilton's system and screening model currently perhaps favors best transitioning to renting if potential vendors can supply equipment and calibration material when needed.

Lack of a consistent specialty testing source: Wilton's local government units (Town, school, Sewer, and Water) lack the equipment and technical capacity to test for various specialty parameters (e.g. surfactants, phosphorous, e-coli). Neighboring water-testing governments similarly have proven unable or unwilling to consistently assist Wilton's stormwater program with necessary specialty sample testing. The town has, however, been able to get limited numbers of specialty tests done by private companies, notably ChemServ in Milford, NH. However, ChemServ limited the number of tests it would run at any given time, and unfortunately shut its doors unexpectedly in summer 2024. Wilton now has to take tests to Nelson Analytical in Manchester, NH. Traveling

that distance is a burden on top of already limited personnel capacity, but the company appears to have less limits on the number of samples it can run – it is currently unknown if they can assist with surfactants.

Final Note on weather conditions:

Weather during the town's summer sampling/testing season (for the past few years since the town has increased its testing capacity) has been extremely wet, rendering it difficult to get dry weather samples during the past 6 years.

Catchment Investigations

☒ No catchment investigations were conducted **during this report period**. Catchment investigations include investigations associated with Problem, High Priority, and Low Priority Outfalls/Interconnections within the MS4 regulated area.

☐ Catchment investigations were conducted

Number of catchment investigations **during this reporting period**: 0. Catchment Investigations were conducted as outlined in Part [2.3.4.8](#). of the permit and include investigations associated with Problem, High Priority, and Low Priority Outfalls and Interconnections within the MS4 regulated area.

Percentage of total catchments investigated **to date (Year 1 - Year 6)**: 0

Provide additional information regarding catchment investigations:

Wilton was gifted a simple catchment map in 2023 by the efforts of its then Asset Management contractor, Underwood Engineering, but has been unable to more accurately delineate these catchments with known stormwater assets and get additional assistance for planning analysis and investigations in Year 6 despite attempting to do so. For the past two years, Wilton applied for a NHDES Stormwater Planning grant, but lost out on both occasions.

Specialty assistance in this area of permit responsibility is believed to be mandatory for Wilton by current personnel due to the size of the town: Devoting large amounts of personnel resources to stormwater management has been infeasible financially and from a raw technical perspective (i.e. lack of the ability to attract and/or hire stormwater educated personnel means program managing efforts are a side task of a few dedicated, but burdened employees and volunteers.) Wilton's Sewer Department, for example, consists just of three commissioners and who they can hire to perform system maintenance tasks for them.

What's more, the size of Wilton's Stormwater Program unexpectedly appears to be less attractive for large stormwater engineering firms to assist for significantly sized specialty projects: Anecdotally in 2024, the cost/benefit for certain well-known private firms to assist Wilton on discreet, but highly

technical stormwater permit projects appears to be an issue, perhaps due to more lucrative, less intensive contracts being available and more attractive (e.g. larger, longer term projects versus Wilton's small, but still complex ones). Regardless, in 2025, Wilton will be again trying to secure third party specialty assistance, and will do what it can to build capacity within what parameters the Select Board, Budget Committee, and legislative body (collective voters at town meeting) are able to set.

IDDE Progress

- ☐ No illicit discharges were found **during this reporting period.**
- ☒ Illicit discharges were found but not removed **during this reporting period.**
- ☒ Illicit discharges were removed **during this reporting period** and the illicit discharges removal report can be found in submission **and/or** at the following website

https://www.wiltonnh.gov/government/stormwater_management ->

(MS4 Incident 23-01 and MS4 Incident 23-02)

https://www.wiltonnh.gov/UserFiles/Servers/Server_13599840/File/Government/MS4%20Stormwater/Stormwater%20Incidnet%2023-01.pdf

https://www.wiltonnh.gov/UserFiles/Servers/Server_13599840/File/Government/MS4%20Stormwater/Stormwater%20Incidnet%2023-02.pdf

Number of illicit discharges identified **during this reporting period:** 2

Number of illicit discharges removed **during this reporting period:** 1

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

Total number of illicit discharges identified **since the effective date of the permit (July 1, 2018 – June 30, 2024):** 3

Total number of illicit discharges removed **since the effective date of the permit (July 1, 2018 – June 30, 2024):** 3

Provide additional information regarding IDDE progress requirements:

*Wilton is only counting illicit discharges that were sufficiently known by staff to be occurring. Staff and volunteers are aware of other potential illicit discharges, and have successfully intervened on a number of those situations (e.g. required installation of BMPs or applying to the Planning Board to undergo stormwater reviews of various types), but definitive detection has proven to be challenging when field investigations by trained staff unfortunately detract from the main purpose for which some positions were hired.

*Most Wilton personnel have not been trained in estimating discharge quantities, and most detected were of such a nature that calculating would be extremely difficult unless observed first hand.

*Wilton suffered staff turnover in its Building Inspector/Code Enforcement Officer position again in year 6 with two Building Inspector /CEO departures occurring due to pay and travel distance. Wilton has subsequently hired a veteran BI/CEO who is able to commit to part-time. This individual is skilled in Zoning / Construction enforcement, but is not trained in Stormwater specialty detection currently.

*Wilton has had some success in general stormwater management enforcement locally (e.g. enforcing site controls for construction, and intervening on stormwater problems that were caught before illicit discharges occurred), but it is hampered by the fact that it is extremely expensive to enforce on recalcitrant offenders.

*New Hampshire is an extremely difficult environment for small communities to perform code enforcement activities, let alone with something as untested in the state from a legal perspective as the apparatus to specifically enforce stormwater regulations. What Wilton has found anecdotally, is that other MS4 municipalities are reluctant to utilize IDDE ordinances due to the complexity of the subject matter, the deference the state's legal structures have for potential offenders, and the reality that the majority of budgets for such purposes are raised entirely locally and are extremely strained. What enforcement actions that have actually occurred, have utilized more familiar legal structures: Since Wilton has until recently, for example, had relatively unsophisticated sewer enforcement ordinances, this has proven a barrier.

Employee Training

☒ Provided training to employees involved in IDDE program **during this reporting period:**

Wilton personnel were trained using IDDE training videos and a written IDDE SOP created by UNH, the City of Dover, and NHDES. Video topics included collecting data and water samples in the field, analyzing for pertinent parameters as identified in the permit, how to identify an illicit discharge, and general IDDE sampling protocols. Training logs are included in Appendix F of the IDDE Program Plan.

In addition, Wilton routinely provides IDDE materials and training, including information on how to identify illicit discharges and SSOs are made available to applicable employees in accordance with IDDE Program Plan.

See updated 2024 SWMP and IDDE plan for more training details.

https://cdnsm5-hosted.civiclive.com/UserFiles/Servers/Server_13599840/File/Government/MS4%20Stormwater/IDDE%202024%20plan.pdf

https://cdnsm5-hosted.civiclive.com/UserFiles/Servers/Server_13599840/File/Government/MS4%20Stormwater/SWMP%20Draft%202023%20draft%209.15.23.pdf

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

The death of Public Works Director Michael Tatro, and losing two building inspectors to other municipalities means IDDE progress has been very difficult. At present, enforcement is largely executed, directed, and arranged by the Stormwater Manager with assistance from minimally trained personnel from other departments. Although there's been success, as long as the Town Administrator position is relied upon as the primary IDDE operative, capacity will be extremely limited. The hope is to eventually train the Building Inspector, Land Use Administrator, and whatever succeeds the town's changing Public Works Director dynamic, as trained IDDE operatives to assist.

MCM 4: Construction Site Stormwater Runoff Control

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

Number of site plan reviews completed *during this reporting period*: 61

Number of inspections completed *during this reporting period*: 30

Number of enforcement actions taken *during this reporting period*: 4

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

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

*Wilton's Planning Board requires stormwater review above and beyond what is minimally required by the permit. All site plans, driveway permits, and stormwater applications that they oversee go to the stormwater manager, highway department, and building inspector. Although site inspections aren't particularly sophisticated right now, any site of significant stormwater concern is visited by the stormwater manager; driveway permits receive visits from the Public Works Director and now Highway Superintendent and Building Inspector; The Building Inspector is the primary agent for construction monitoring, and this occurs when building permit inspections or complaints are received. The 30 inspections listed are just the stormwater' manager's site visits throughout the year.

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

Ordinance or Regulatory Mechanism

- ☒ Wilton has a regulatory mechanism(s) consistent with permit requirements.

Date regulatory mechanism(s) was adopted: 11/20/1991 (amended last January 4, 2023) The regulatory document can be found at:

<https://www.wiltonnh.gov/cms/One.aspx?portalId=13599924&pageId=13786266>

- ☐ Wilton has not drafted or adopted a regulatory mechanism(s) consistent with permit requirements.

As-built Drawings

Number of as-built drawings received *during this reporting period*: 60+

Street Design and Parking Lots Report

- ☐ Wilton developed a **report during this reporting period assessing street design and parking lot regulations** to determine the feasibility of making low impact design options allowable when appropriate site conditions exist and made it available as part of the SWMP.
- ☐ No updates were made or planned to be made to **Local Regulations and/or Guidelines during this reporting period**.
- ☐ Updates were recommended **and/or** planned to be made to **Local Regulations and/or Guidelines during this reporting period**. Following are the recommended **and/or** planned updates: Wilton to note recommended or planned updates here. The anticipated date of completion for updates is
- ☐ No updates were made **during this reporting period** because all required **Local Regulation and/or Guideline** updates have been made to make low impact designs allowable as outlined in the Local Regulations Assessment Report.

Green Infrastructure Report

- ☐ Wilton developed a report *during this reporting period* assessing local regulations to determine the feasibility of making green infrastructure practices allowable when appropriate site conditions exist and made it available as part of the SWMP.
- ☐ No updates were made or planned to be made to **Local Regulations during this reporting period**.
- ☐ Updates were recommended **and/or** planned to be made to **Local Regulations during this reporting period**. Following are the recommended **and/or** planned updates: Wilton to note recommended or planned updates here. The anticipated date of completion for updates is
- ☒ No updates were made *during this reporting period* because all required **Local Regulation** updates have been made to make green infrastructure practices allowable as outlined in the Assessment Report.

Retrofit Properties Inventory

- ☒ Wilton has identified permittee-owned properties that **could be** modified or retrofitted with BMPs to mitigate impervious areas and of which are included in the list below:

List of MS4 Properties: https://www.wiltonnh.gov/government/stormwater_management
(see hotspot mapping list)

List of Non-S4 Properties: https://www.wiltonnh.gov/government/stormwater_management

(see hotspot mapping list)

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

*When reviewing town properties, most have in fact already received appropriate stormwater mitigation upgrades in the last 20 years

*The biggest concern property, the Wilton Highway Garage, has major problems, with some having been mitigated, but formal replacement of the building is seen as the best way to alleviate these concerns by the community

*Wilton had hoped to procure a general stormwater permit assistance engineering contractor to assist with various review processes that are assessed to mandate specialty knowledge, but the town was unable to secure one in year 6. This will be sought in 2024 as the town wants to review various past town efforts: The Stormwater Manager assesses various program management efforts need specialty review and reconfiguring.

MCM 6: Good Housekeeping

Catch Basin Cleaning

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

No actions were taken because no catch basin sumps were more than 50% full during two consecutive routine inspections/cleaning events. Please note, the town did find catch basins in the Spring that were above 50%, but these were not within the MS4 area.

Number of catch basins inspected **during this reporting period:** 150

Number of catch basins cleaned **during this reporting period:** 150

Total volume **or** mass of material removed from **all** catch basins **during this reporting period:** 26 cubic yards

Total number of catch basins within the MS4 system: 135

Street Sweeping

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

All curbed roadways were swept at least once **during this reporting period.**

Number of (lane) miles swept **during this reporting period:** 10.81 miles

Volume of swept material **during this reporting period:** 7 cubic yards

Stormwater Pollution Prevention Plan (SWPPP)

Wilton has **not** implemented SWPPPs for all permittee owned or operated maintenance garages, public works yards, transfer stations, and other waste handling facilities that are not currently covered under another NPDES Permit.

The town's legacy highway garage does not have a formally adopted SWPP currently, due to the untimely passing of Wilton's public works director in early 2024: It was hoped an appropriate SWPPP was going to be implemented in 2024, but his passing has delayed creation and implementation. All other facilities that require SWPPPs have SWPPPs implemented.

Number of site inspections completed for **during this reporting period:** 16

Number of corrective actions taken **during this reporting period:** 1

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

One action was taken. This was a combined site mitigation effort at the Highway Garage. It included dirt work to reshape parts of the site that were allowing easy flow of water off the back of the property to conservation land, and removal of multiple tons of junked equipment and unusable material.

Operations and Maintenance (O & M) Programs

☒ O&M programs for all permittee owned facilities have been completed and/or updated as noted below:

☒ Implemented all maintenance procedures for permittee owned facilities in accordance with O&M programs.

☒ Updated inventory of all permittee owned facilities as necessary.

All permittee owned facilities, including an inventory, are included in our SWMP. There were no changes to report during Year 6.

☒ Implemented program for MS4 infrastructure maintenance to reduce the discharge of pollutants as outlined in the SWMP.

☒ Inspected all permittee owned treatment structures (excluding catch basins) as outlined in the SWMP.

☐ Enclosed all road salt storage piles or facilities and implemented winter road maintenance procedures to minimize the use of road salt as outlined in the SWMP.

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

- Wilton has adopted O&M procedures, but execution has been problematic due to continued staffing issues. Currently, facilities remain managed by individual departments with vastly different operational structures: Some O&M tasks are conducted by staff, while others are conducted by contractors.
- The Stormwater Manager has inspected each site annually to view potential stormwater problems. This in part helped assist mitigation work done at the Highway Garage.
- More thorough mitigation at the highway garage will likely require either replacement or assistance by a knowledgeable environmental engineering firm.

Appendix F and H: Water Quality Limited Waters & TMDLs

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

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

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

N/A

Chloride Impairment (Appendix H)

☒ Permittee **does not** have a chloride impairment.

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

N/A

Nitrogen Impairment (Appendix H)

☒ Permittee **does not** have a nitrogen impairment.

N/A

Phosphorus Impairment (Appendix H)

☐ Permittee **does not** have a phosphorus impairment.

☒ Permittee **has** a phosphorus impairment.

☒ Distributed an annual message that encourages the proper use and disposal of grass clippings and encourages the proper use of slow-release fertilizers **during this reporting period.**

☒ Distributed an annual message encouraging the proper management of pet waste, including noting any existing ordinances where appropriate **during this reporting period.**

☒ Distributed an annual message encouraging the proper disposal of leaf litter **during this reporting period.**

☐ Increased street sweeping frequency of all municipal owned streets and parking lots subject to Permit part 2.3.7.d.iii to a minimum of two times per year (spring and fall) **during this reporting period.**

☒ Increased street sweeping frequency of all municipal owned streets and parking lots subject to Permit part 2.3.7.d.iii to a minimum of one time per year (spring) and implemented a fall leaf litter collection program in lieu of post-drop street sweeping **during this reporting period.**

Phosphorus Source Identification Report

☐ The Phosphorus Source Identification Report can be found in submission **and/or** at the following website

Structural BMPs

☒ Wilton **has not installed** a minimum of one structural BMP(s) as a demonstration project within the drainage area of the water quality limited water or its tributaries **by the end of this reporting period** because this requirement is **not** due until Year 8.

☐ Wilton **has installed** a minimum of one structural BMP(s) as a demonstration project within the drainage area of the water quality limited water or its tributaries **by the end of this reporting period.** The type of structural BMP(s) that was installed was a _____. Wilton is reporting the installation of the structural BMP(s) ahead of Year 8 in order to make EPA aware that the requirement has been completed early.

- ☐ Structural BMP(s) listed in Attachment 3 to Appendix F already existing or installed in the regulated area by Wilton or its agents was tracked and the phosphorus removal by the BMP(s) was estimated consistent with Attachment 3 to Appendix F. The BMP(s) type, total area treated by the BMP(s), the design storage volume of the BMP(s), and the estimated phosphorus removed in mass per year by the BMP(s) were documented in **PTAP 2024 Nutrient Reduction Report** in submission **and/or** this link [The total estimated phosphorus removed from the installed BMP\(s\) is ____lbs. per year](#)

____ is utilizing the Pollutant Tracking and Account Project, better known as 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 ____ 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.

- ☐ Structural BMP(s) listed in Attachment 3 to Appendix F already existing or installed in the regulated area by Wilton or its agents was tracked and the phosphorus removal by the BMP(s) was estimated consistent with Attachment 3 to Appendix F. The BMP(s) type, total area treated by the BMP(s), the design storage volume of the BMP(s), and the estimated phosphorus removed in mass per year by the BMP(s) were documented in **Wilton Tracking Program** in submission **and/or** at this link [The total estimated phosphorus removed from the installed BMP\(s\) is ____Lbs per year](#)
- ☐ No BMPs were installed **by the end of this reporting period** because the requirement to plan and install a minimum of one structural BMP is **not due until Year 8**. The total estimated phosphorus removed from the installed BMP(s) is 0 lbs/year.

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

Wilton was only assigned a phosphorous impairment relatively recently: NHRIV700060902-05 SOUHEGAN RIVER - TUCKER BROOK. It has been unable to create a phosphorous source identification report due to a lack of native technical capacity, but will work towards doing so. In the meantime, it has implemented necessary public notice and involvement efforts.

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

☒ Permittee **does not** have a solids, oil and grease, or metals impairment(s).

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

n/a

Chloride TMDL (Appendix F)

☒ Permittee **does not** have a chloride TMDL.

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

N/A

Lake and Pond Phosphorus TMDL (Appendix F)

☒ Permittee **does not** have a lake and pond phosphorus TMDL.

Non-Structural Controls

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

N/A

Additional Required Information

Monitoring or Study Results

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

☐ Not applicable.

☒ The results from additional reports or studies are in the following link:

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:

https://www.wiltonnh.gov/government/stormwater_management/water_sampling_reports

The Wilton Youth Center/Goss Park Recreation Group, in partnership with the Town of Wilton's Conservation Commission, conducted E.coli testing again at the inlet to Goss Park in Spring/Summer 2024. After several tests that spiked E.coli to unsafe levels, they performed a follow-up genetic test at the external, inlet from Stony Brook at Goss Park. The Census test found evidence of human sources, which corresponds to code enforcement efforts regarding failed septic systems occurring in Lyndeborough.

Description of Any Changes in Identified BMPs or Measurable Goals

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

Activities Planned for Next Reporting Period

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