Year 7 Annual Report
New Hampshire Small MS4 General Permit
Reporting Period: July 1, 2024-June 30, 2025

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

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

Part I: Contact Information

Name of Municipality or Organization: City of Manchester

EPA NPDES Permit Number: NHR041017

Primary MS4 Program Manager Contact Information

Name: Robert J. Robinson, PE Title: Chief Engineer - EPD

Street Address Line 1: 300 Winston Street

Street Address Line 2: na

City: Manchester State: NH Zip Code: 03103

Email: rrobinson@manchesternh.gov Phone Number: (603) 624-6526

Stormwater Management Program (SWMP) Information

SWMP Location (publicly available web address): https://www.manchesternh.gov/Departments/Sewer-and-Stormwater/Stormwater/Stormwater-Management-Program

Date SWMP was Last Updated: Dec 31, 2024

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

Part II: Self-Assessment

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

Impairment(s)

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

TMDL(s)

☒ Bacteria and Pathogen ☐ 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 7 Requirements

☒ Completed catchment investigations associated with Problem Outfalls

☒ Completed catchment investigations where information gathered on the outfall/interconnection indicated sewer input

Annual Requirements

☒ Provided an opportunity for public participation in review and implementation of SWMP and complied with State Public Notice requirements

☒ Kept records relating to the permit available for 5 years and made available to the public

☒ The SSO inventory has been updated, including the status of mitigation and corrective measures implemented

- ○ This is not applicable because we do not have sanitary sewer
- ○ This is not applicable because we did not find any new SSOs
- ◉ The updated SSO inventory is attached to the email submission
- ○ The updated SSO inventory can be found at the following publicly available website:

☒ Updated system map due in year 10 with information from completed catchment investigations

☒ Provided training to employees involved in IDDE program within the reporting period

☒ Properly stored and disposed of catch basin cleanings and street sweepings so they did not discharge to receiving waters

☒ All curbed roadways were swept at least once within the reporting period

☒ Implemented SWPPPs for all permittee owned or operated maintenance garages, public works yards, transfer stations, and other waste handling facilities

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

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

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

Annual Requirements

*Public Education and Outreach**

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

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

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

Chloride Impairment

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

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

Phosphorus Impairment

Annual Requirements

*Public Education and Outreach**

☒ Distributed an annual message in the spring (April/May) encouraging the proper use and disposal of grass clippings and encouraging the proper use of slow-release and phosphorus-free fertilizers

☒ Distributed an annual message in the summer (June/July) encouraging the proper management of pet waste, including noting any existing ordinances where appropriate

☒ Distributed an annual message in the fall (August/September/October) encouraging the proper disposal of leaf litter

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

Good Housekeeping and Pollution Prevention for Permittee Owned Operations

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

Structural BMPs

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

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

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

This is Appendix C to the Phosphorus Impairment Plan located at https://www.manchesternh.gov/Departments/Sewer-and-Stormwater/Stormwater/Stormwater-Management-Program

Total estimated phosphorus removed in **lbs/year** from the installed BMPs: 28.11

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

A structural BMP (bioretention) was designed to serve as a demonstration project at the Piscataquog Boat Ramp off of Electric Street, located in both the Namaske Lake and Merrimack River watersheds, both

impaired for phosphorus. Tree box filters were also incorporated into proposed boat ramp improvements at Stevens Pond, also within the Merrimack River watershed. These BMPs were incorporated into the City's CMOM C5 construction bid package in the Fall of 2024. Bids came in higher than the available budget and the Stevens Pond boat ramp improvements were removed from the contract. Safety concerns were prioritized within the construction schedule, with the bioretention system at the Piscataquog boat ramp pushed until Fall of 2025. Construction of the bioretention system commenced in September 2025. Additionally, the City has a $3 million drainage improvement construction contract that commenced in July 2025, which includes stormwater treatment BMPs at two schools located within the Nutt Pond and Pine Island Pond watersheds, which have phosphorus TMDLs.

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

Annual Requirements

Good Housekeeping and Pollution Prevention for Permittee Owned Operations

☒ Increased street sweeping frequency of all municipal owned streets and parking lots to a schedule that targets areas with potential for high pollutant loads

- ○ The street sweeping schedule is attached to the email submission
- ◉ The street sweeping schedule can be found at the following publicly available website:

This is Appendix J to the SWMP located at https://www.manchesternh.gov/Departments/Sewer-and-Stormwater/Stormwater/Stormwater-Management-Program

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

Increased Street Sweeping - The City has impairments for lead (Black Brook-Hardy Brook), iron (Little Cohas-Unnamed Brook, South Perimeter Brook) and aluminum (Merrimack River) only. Increased sweeping was determined not to be necessary in these areas as they are not observed to accumulate more sediment and debris than other areas within the City.

Lake and Pond Phosphorus TMDL

Baseline phosphorus export rate from LPCP Area **(lbs/year)[A]**:	1,392
Total phosphorus reduction from all nonstructural controls this reporting period **(lbs/year) [B]**:	20.74
Total phosphorus reduction from all structural controls installed this reporting period and all previous years **(lbs/year) [C]**:	75.09
Phosphorus load increase due to development incurred since baseline loading was calculated in **lbs/year [D]**:	0
Current phosphorus export rate from the LPCP Area in **lbs/year [=A-(B+C)+D** from above**]**:	1,296.17

☐ I certify under penalty of law that all source control and treatment Best Management Practices being claimed for phosphorus reduction credit have been inspected, maintained and repaired in accordance with manufacturer or design specification. I certify that, to the best of my knowledge, all Best Management Practices being claimed for a phosphorus reduction credit are performing as originally designed.

☒ Implemented all nonstructural control measures **during this reporting period** and documented the measures and their phosphorus reduction. The nonstructural control measure information:

- ○ is attached to the email submission
- ◉ can be found at the following publicly available website:

This is documented in the Phosphorus Impairment Plan (Section 7.2) located at https://www.manchesternh.gov/Departments/Sewer-and-Stormwater/Stormwater/Stormwater-Management-Program

☒ Documented the structural control measures implemented during **this reporting period and all previous years**, including location, phosphorus reduction in weight/year, and date of last completed maintenance and inspection for each control. The structural control measure information:

- ○ is not applicable; no structural control measures were implemented
- ○ is attached to the email submission
- ◉ can be found at the following publicly available website:

No structural control measures were implemented this reporting period. Controls implemented in previous years are documented in Appendix C to the Phosphorus Impairment Plan located at https://www.manchesternh.gov/Departments/Sewer-and-Stormwater/Stormwater/Stormwater-Management-Program

The LPCP: (*select one of the following options. If you submitted your LPCP in a prior annual report and have an updated website, please include the website below)*

- ○ was submitted in a prior annual report
- ○ is attached to the email submission
- ◉ can be found at the following publicly available website:

See Phosphorus Impairment Plan located at https://www.manchesternh.gov/Departments/Sewer-and-Stormwater/Stormwater/Stormwater-Management-Program

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

The City has prepared a combined Phosphorus Source Identification Plan and Lake Phosphorus Control Plan (LPCP) titled Phosphorus Impairment Plan. These were combined due to the many overlapping requirements and because all of the LPCP waterbodies are within the watershed of the Merrimack River, which is impaired for phosphorus, but does not have a TMDL.

Phosphorus removals from non-structural controls include street sweeping, catch basin cleaning, and the use of phosphorus free fertilizer. Phosphorus removals from structural BMPs include City owned BMPs and areas where a City outfall discharges to a large pervious area that allows for an IA disconnection credit in accordance with the MS4 permit. Areas of IA disconnection were based on an initial screening process and field verification of a subset of outfalls. Additional IA disconnection credits will be evaluated in future reporting years.

No new BMPs were constructed this period, however, the City has a $3.0 million drainage improvement construction contract in progress, which includes stormwater treatment BMPs at two schools located within the Nutt Pond and Pine Island Pond watersheds, which have phosphorus TMDLs.

Stormwater BMPs being claimed for phosphorous reduction credit have been evaluated in the field and/or

through analysis of available design plans. Pollutant removals for BMPs with available plans have been assessed according to the provided engineering design plans to estimate pollutant reductions provided. BMPs with no available plans were instead assessed in the field according to best engineering judgment. The City cannot certify that BMPs assessed in the field are performing as originally designed, as design plans are not available. However, we feel that reasonable steps have been made to accurately quantify pollutant removals provided by existing stormwater BMPs. Additionally, the City continues to perform annual inspections of City-owned BMPs, with maintenance performed as needed so that they continue to function and provide treatment. Some maintenance is handled by City staff, however, due to limited in-house resources, the City is evaluating using an outside vendor.

The City has not yet calculated increases in phosphorus load due to development since the baseline loading was calculated. The City is using a scaled back approach to phosphorus baseline recalculations with assistance from the UNH Stormwater Center. Consistent with the NH Stormwater Coalition and UNH Stormwater Center, the City plans to update the phosphorus baseline calculations every 5 years or whenever meaningful and substantial updates are made to the critical impervious surface and land use/cover GIS layers that are used in the phosphorus base characterization. Due to this new approach, phosphorus load increases due to development incurred since baseline loading were not calculated during this reporting period. The New Hampshire Stormwater Coalition and the UNH Stormwater Center are in the process of calculating the phosphorus load increases due to development incurred since baseline loading and will be available in the future.

Optional: Use the box below to provide any additional information you would like to share as part of your self-assessment:

As outlined in our Year 2-6 Annual Reports, the MS4 Permit requires the City to achieve a significant reduction in phosphorus loads (50-71%) to waters with phosphorus TMDLs, a significant portion of which comes from existing privately developed properties and Interstate 93 that discharge to the City's MS4 or directly to surface waters. The City has control of 25% to 33% of land in its LPCP MS4 catchment areas for any given waterbody, which equates to about 29% to 35% of baseline phosphorus loads from these areas. This means that even if the City were able to treat 100% of all stormwater discharged from City-owned land at an unrealistic 100% removal, Manchester would still fall well short of the required phosphorus reductions for each waterbody. In reality, the vast majority of City-owned land is associated with narrow right-of-ways along roadways, limiting the potential for large-scale stormwater treatment BMPs, and high groundwater and urban soils eliminate the use of more efficient infiltration BMP options. Even if the City could treat all City-owned surfaces, the cost would be unattainable in the 10-year period, ranging anywhere from $11 million to $100 million depending on the type and complexity of the site and BMP. This increases to $27 million to $230 million to reach TMDL removal goals on public and private property.

Outside of site redevelopment regulations, existing private properties are currently not subject to stormwater permits and are not regulated to reduce their share of phosphorus contributions to TMDL waters. Instead, the City is responsible for achieving phosphorus reductions from these private developments because these developments are located within Manchester's MS4. While the site development regulations will assist the City in minimizing existing loads as properties are redeveloped, it will take far longer than the 10 year schedule required under the MS4 permit to achieve its reduction goals. The City continues to recommend a state or federal level stormwater permit for existing large commercial, industrial and institutional properties located within TMDL watersheds, similar to that in Vermont or the Residual Designation Authority proposed for the Charles River Watershed in Massachusetts, with the same phosphorus or more stringent reduction requirements that the MS4 permitted communities are required to achieve to help mitigate impacts from existing development.

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:

Changes in impairments from the NOI include:

1. Black Brook-Hardy Brook (NHRIV700060801-05-01): new impairment for dissolved oxygen (DO) saturation
2. Crystal Lake-Town Beach (NHLAK700060703-02-01): no longer impaired for (DO) saturation
3. Melody Pines Day Camp Beach (NHLAK700060703-02-03: no longer impaired (DO and DO saturation)
4. Massabesic Lake (NHLAK700060702-03): wasn't included on the NOI, however, is impaired for DO, DO saturation, cyanobacteria, non-native aquatic plants and pH
5. McQuesten Brook (NHRIV700060803-16): no longer impaired for DO; new impairment for E. coli added
6. Merrimack River (NHRIV700060802-14-02): wasn't included on the NOI (extremely small portion of the river in Manchester), however, was impaired for aluminum, DO saturation, pH, E. coli at time of NOI; no longer impaired for DO saturation
7. Merrimack River (NHRIV700060803-14-02): new impairment for phosphorus
8. Saint Anselm Brook-To Piscataquog River (NHRIV700060607-35): new impairment for DO saturation and chloride

The City maintains an ongoing online GIS database of dry weather inspection results, which includes the identification and location of any new outfalls and any impairments of the receiving water. These new outfalls are also incorporated into the updated outfall priority ranking included in the IDDE Plan. The City has 678 MS4 outfalls, including 31 that discharge to a long culverted stream (e.g., watercourse that has been enclosed underground). The total number of City owned outfalls was reduced from 704 outfalls in 2024 to 678 outfalls in 2025 due to more detailed investigation to identify data gaps in the mapping. The additional investigations revealed some outfalls to be private, some to be inlets, and some to be culverts with no other drainage connections.

Part IV: Minimum Control Measures

Please fill out all of the metrics below. If applicable, include in the description who completed the task if completed by a third party.

MCM1: Public Education

Number of educational messages completed **during this reporting period**: 14

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

BMP: Septic System Outreach

Message Description and Distribution Method:

EPD leaves "What's Flushable" magnets and "Get Pumped" brochures at the WWTF front desk for septic haulers to take and distribute to their customers.

Targeted Audience: Residents

Responsible Department/Parties: DPW-EPD

Measurable Goal(s):

Residents are aware of water quality impacts from septic systems, the importance of maintaining septic systems, and how to maintain them. Metrics include: 3 out of 6 magnets and 2 out of 50 brochures have been picked up.

Message Date(s): Ongoing (magnets/brochures)

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:

Education to septic owners was not specifically called out in the NOI as the City is mostly sewered, but does apply to a small percentage of City residents.

BMP: Scoop the Poop Pet Waste Management Summer Message

Message Description and Distribution Method:

The Scoop the Poop pledge was published in the Sunday Union Leader. The article included a link and QR code to take the Scoop the Poop pledge. The Scoop the Poop fact sheet is permanently posted at the Manchester Urban Ponds kiosks and three City kiosks located at CSO outfalls along the Merrimack River. The City also distributes an education fact sheet with dog license registration forms. It was also posted on the DPW Facebook page and Urban Pond Restoration Program (UPRP) Facebook page.

Targeted Audience: Residents

Responsible Department/Parties: DPW-EPD

Measurable Goal(s):

Dog owners 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. Metrics include: Circulation for Sunday Union Leader (23,242). Number of kiosk postings (12 postings). Number of Scoop the Poop pledges (11 pledges). Number of followers, likes, comments and shares to Facebook posts (DPW - 1,700 followers, 3 likes, 1 comments, 1 shares) (UPRP - 887 followers, 5 likes, 1 comments, 0 shares).

Message Date(s): Ongoing (fact sheets, kiosks). 7/28/24 (newspaper article). 7/31/24 (DPW Facebook post). 7/25/24 (UPRP Facebook post).

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: Rake It or Leave It Leaf Litter Fall Message

Message Description and Distribution Method:

An article outlining proper disposal of leaf litter was published in the Sunday Union Leader. It was also posted on the DPW Facebook page and UPRP Facebook page.

Targeted Audience: Residents

Responsible Department/Parties: DPW-EPD

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. Metrics include: Circulation for Sunday Union Leader (23,242). Number of followers, likes, comments and shares to Facebook posts (DPW - 1,700 followers, 2 likes, 0 comments, 0 shares) (UPRP - 887 followers, 1 likes, 0 comments, 0 shares).

Message Date(s): 10/13/24 (newspaper article). 10/17/24 (DPW Facebook post). 10/16/24 (UPRP Facebook post).

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 Clippings/Fertilizer Spring Message

Message Description and Distribution Method:

An article outlining proper disposal of grass clippings and proper application of fertilizer was published in the Sunday edition of the Union Leader. It was also posted on the DPW Facebook page. Earth friendly lawn care

practices were posted on the UPRP Facebook page.

Targeted Audience: Residents

Responsible Department/Parties: EPW-EPD

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. Metrics include: Circulation for Sunday Union Leader (23,242). Number of followers, likes, comments and shares to Facebook posts (DPW - 1,700 followers, 6 likes, 0 comments, 0 shares) (UPRP - 887 followers, 0 likes, 0 comments, 0 shares).

Message Date(s): 4/26/25 (newspaper article). 4/28/25 (DPW Facebook post). 4/28/25 (UPRP Facebook post).

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: Catch Basin Cleaning Message

Message Description and Distribution Method:

A message to keep storm drains clear was posted in the Sunday Union Leader. A catch basin/stormwater drain clearing announcement was posted on the DPW Facebook page.

Targeted Audience: Residents

Responsible Department/Parties: DPW-EPD

Measurable Goal(s):

Residents assist in keeping catch basins clear before storms to minimize flooding and associated damage. Metrics include:
Circulation for Sunday Union Leader (23,242). Number of followers, likes, comments and shares to Facebook posts (DPW - 1,700 followers, 4 likes, 0 comments, 5 shares) (UPRP - 887 followers, 2 likes, 0 comments, 0 shares).

Message Date(s): 10/20/24 (newspaper article). 10/23/24 (DPW Facebook post). 10/23/24 (UPRP Facebook post).

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:

Catch basin cleaning education was not included as a message in the NOI, however, has been added to increase awareness of the function of the drainage system and importance of keeping it functional to prevent flooding.

BMP: Hazardous Waste and Yard Waste Message & Collection Day

Message Description and Distribution Method:

Household hazardous waste collection days posted in the Union Leader and on UPRP Facebook page.

Targeted Audience: Residents

Responsible Department/Parties: DPW-EPD

Measurable Goal(s):

Residents properly dispose of HHW at scheduled collection events. Metrics include: Circulation for Sunday Union Leader (23,242). Number of followers, likes, comments and shares to Facebook posts (UPRP - 887 followers, 2 likes, 1 comments, 6 shares).

Message Date(s): 10/9/24, 10/11/24, 5/5/25, 5/9/25 (HHW newspaper article). 10/12/24 & 5/10/25 Collection Days at Transfer Station. 10/9/24 (UPRP Facebook post).

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: Winter Maintenance

Message Description and Distribution Method:

A mailing (flyer) outlining the requirements for the application of salt on private parking lots and streets, including using a certified SnowPro contractor, was sent 11/19/24 to all businesses with 10 or more parking spaces located within a chloride impaired watershed. After receiving feedback that most businesses hire a snow contractor in early Summer, a postcard reminding businesses to hire a SnowPro certified contractor was sent 6/4/25.

Targeted Audience: Businesses, institutions and commercial facilities

Responsible Department/Parties: DPW-EPD

Measurable Goal(s):

Businesses and institutions hire certified SnowPro contractors for winter parking lot and street maintenance. Metrics include: Fall flyer (390 mailings targeting 235 parcels, 155 to owners at different addresses). Spring postcard (381 mailings targeting 232 parcels).

Message Date(s): 11/19/24 (fall flyer mailing). 6/4/25 (spring postcard mailing).

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: Solid Waste and Recycling Message

Message Description and Distribution Method:

Several solid waste messages posted on DPW Facebook page, including yard/solid waste collection & disposal information, messages on municipal trash receptacles and refuse trucks, residential trash can information, bulky item pick up and illegal dumping pickup at Rock Rimmon. Yard waste collection posted on UPRP Facebook page.

Targeted Audience: Businesses, institutions and commercial facilities, Residents

Responsible Department/Parties: DPW-EPD

Measurable Goal(s):

Residents collect and dispose of leaves and yard waste and other waste through the curbside pickup program. Metrics include: Number of followers, likes, comments and shares to Facebook posts (DPW - 1,700 followers, 137 likes, 14 comments, 75 shares) (UPRP - 887 followers, 14 likes, 0 comments, 0 shares).

Message Date(s): 9/16/24, 3/3/25, 3/5/25, 3/28/25, 4/11/25, 4/18/25, 4/23/25 (DPW Facebook posts). 4/11/25 (UPRP Facebook posts).

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: General Lake/River Health Messages

Message Description and Distribution Method:

General fact sheets about lake/river health are permanently posted at the Manchester Urban Ponds kiosks and the three City kiosks located at CSO outfalls along the Merrimack River. Fact sheets include information about waterbody cleanups, the Urban Pond Restoration Program, and threats to water quality. The 2025 Urban Ponds Newsletter outlines similar information and was emailed to local press, project partners, the Mayor and Board of Aldermen, and volunteers on 4/1/25. Multiple other posts were made to the Urban Ponds Facebook page including posts about pond history, water quality sampling, and cleanup events. Posts on the NH Chronicle Airing - Tracking Trash were made on 4/23/25 and 5/27/25. Celebrating 25 years of UPRP was posted on 3/31/25. Posts about National Stormwater Day, UPRP Spirit of NH Award and UPRP sampling also posted on the DPW Facebook page.

Targeted Audience: Residents

Responsible Department/Parties: DPW-EPD

Measurable Goal(s):

Residents understand threats to water quality and participate in City cleanup events. Metrics include: Number of followers, likes, comments, and shares to Urban Pond Facebook posts (887 followers, 376 likes, 41

comments and 35 shares). Number of followers, likes, comments, and shares to DPW Facebook posts (1,700 followers, 76 likes, 9 comments and 11 shares). Newsletter emails sent (185).

Message Date(s): 7/4/24, 7/17/24, 8/6/24, 8/7/24, 8/14/24, 8/15/24, 8/17/24, 8/21/24, 8/23/24, 9/9/24, 9/16/24, 10/10/24, 10/19/24, 10/25/24, 11/6/24, 11/15/24, 11/21/24, 12/11/24, 2/18/25, 3/15/25, 3/28/25, 3/31/25, 4/11/25, 4/13/25, 4/19/25, 4/23/25, 4/26/25, 4/29/25, 4/30/25, 5/3/25, 5/6/25, 5/7/25, 5/13/25, 5/15/25, 5/25/25, 5/27/25, 6/24/25, 6/25/25 (UPRP Facebook posts). 11/15/24, 12/7/24, 6/25/25 (DPW Facebook posts). 4/1/25 (Newsletter emails). Ongoing (factsheets, 12 kiosks).

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: BMP Construction and Development Practices

Message Description and Distribution Method:

EPD has a webpage with stormwater resources for site development and construction activities, including information on Construction General Permit (CGP) requirements, City stormwater and sewer regulations, and best practices for construction sites. EPD also has a stormwater regulation webpage with summaries and links to City stormwater regulations and fact sheets for site developers. A Homeowner's Guide to Managing Stormwater is also included on the webpage and handed out to homeowner's that come to Planning for smaller projects.

EPD also works with developer's engineers on development and redevelopment projects in the City to ensure they meet the City's stormwater regulations and performs construction inspections of many properties during development.

Targeted Audience: Developers (construction), Residents

Responsible Department/Parties: DPW-EPD

Measurable Goal(s):

Developers prepare NOI and SWPPPs under NPDES CGP and incorporate best management practices into construction practices. Metrics include: 13 Homeowner's Guide fact sheets handed out. Website is continuously available.

Message Date(s): Ongoing.

Message Completed for: Appendix F Requirements ☐ Appendix H Requirements ☐

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

If yes, describe why the change was made:

BMP: Industrial Outreach

Message Description and Distribution Method:

EPD has a webpage with stormwater resources for industrial facilities, including information on outdoor storage, proper disposal of toxic and hazardous wastes and good housekeeping to minimize contact of pollutants with stormwater runoff.

Targeted Audience: Industrial facilities

Responsible Department/Parties: DPW-EPD

Measurable Goal(s):

Industrial facilities incorporate good housekeeping and best management practices to reduce pollutants in stormwater runoff. Metrics include: Website is continuously available.

Message Date(s): Ongoing

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: BMP Combined Sewer Separation & WWTF

Message Description and Distribution Method:

The progress of several sewer separation projects and WWTP upgrades were posted on DPW's Facebook page. The Cemetery Brook Drainage Tunnel separation project video was posted on the UPRP website.

Targeted Audience: Residents, Businesses

Responsible Department/Parties: DPW-EPD

Measurable Goal(s):

Raise awareness of the combined system and City's efforts to separate stormwater from sewer and improve wastewater discharges to river. Metrics include: Number of followers, likes, comments and shares to DPW Facebook posts (1,700 followers, 59 likes, 4 comments and 6 shares). Number of followers, likes, comments and shares to UPRP Facebook posts (887 followers, 1 likes, 0 comments and 1 shares).

Message Date(s): 9/30/24, 10/1/24, 10/15/24, 11/4/24, 3/7/25, 3/20/25, 5/2/25 (DPW Facebook posts). 10/21/24 (UPRP Facebook posts).

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:

WWTF and combined sewer infrastructure improvement education was not included as a message in the NOI, however, has been added to increase awareness of the City's investment in infrastructure improvements to reduce pollutant loads from its wastewater treatment faciity and combined sewer system.

BMP: BMP School Tours of the WWTF

Message Description and Distribution Method:

EPD conducted school tours of the WWTF and provided presentations on stormwater that includes information on the City's impaired waters, pollutant sources, and the stormwater program being implemented to address drainage issues and water quality.

Targeted Audience: Residents/students

Responsible Department/Parties: DPW-EPD

Measurable Goal(s):

Raise awareness of stormwater issues and improvements in the younger generation. Metrics include: Attendance by 58 school students and teachers.

Message Date(s): 7/18/24, 10/1/24, 4/22/25

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:

EPD participates in a school education program offering tours of the WWTF, These tours include information on stormwater and target our future generations. They were not included in the NOI.

BMP: BMP General Stormwater Pollution Messages

Message Description and Distribution Method:

General information on stormwater pollution in Manchester is permanently posted at the Manchester Urban Ponds kiosks and three City kiosks located at CSO outfalls along the Merrimack River. Fact sheets posted at the City CSO kiosks are entitled "Just Remember", "What Can You Do to Reduce Stormwater Runoff and Pollution", and "Watersheds and the Basics of Stormwater". EPD also has a stormwater webpage with stormwater outreach and good practices tips for residents and businesses.

Targeted Audience: Residents, Businesses

Responsible Department/Parties: DPW-EPD

Measurable Goal(s):

Raise awareness of stormwater issues and measures residents can take to improve water quality. Metrics include: Number of kiosks posted (3 City CSO kiosks and 9 UPRP kiosks). Website is continuously available.

Message Date(s): Ongoing (fact sheets, kiosks, website)

Message Completed for: Appendix F Requirements ☐ Appendix H Requirements ☐

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

If yes, describe why the change was made:

Add an Educational Message

MCM2: Public Participation

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

The SWMP is published on Manchester's website: https://www.manchesternh.gov/Departments/Sewer-and-Stormwater/Stormwater/Stormwater-Management-Program

Was this opportunity different than what was proposed in your NOI? Yes ○ No ◉

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

The SWMP webpage provides a link to an EPD phone number and email encouraging residents to provide any comments/concerns on the current SWMP. No comments were received in Year 7.

MCM3: Illicit Discharge Detection and Elimination (IDDE)

Sanitary Sewer Overflows (SSOs)

Check off the box below if the statement is true.

☐ This SSO section is NOT applicable because we DO NOT have sanitary sewer

*Below, report on the number of SSOs identified in the MS4 system and removed **during this reporting period**.*

Number of SSOs identified: 17

Number of SSOs removed: 1

MS4 System Mapping

Percent of Phase II map complete: 98

Optional: Provide additional status information regarding your map:

All known outfalls, stormwater BMPs, and receiving waterbodies with impairments have been mapped to date. The City has also substantially mapped all known stormwater infrastructure, including catch basins, manholes, pipes, and other miscellaneous infrastructure. The City continues to investigate data gaps in its stormwater drainage infrastructure mapping (e.g., missing piping and connectivity). All field investigations and identification of data gaps are performed using an online GIS platform that allows changes identified in the field to be recorded directly into an online GIS, including more accurate outfall locations, identification of new outfalls, catch basins and pipes, and relabeling of structures misidentified as outfalls. As of the end of Year 7, the City has 678 MS4 outfalls, including 31 that discharge to a long culverted stream (e.g., watercourse that has been enclosed underground).

Screening of Outfalls/Interconnections

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

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

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

Number of outfalls screened: 35

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

Percent of outfalls screened: 100

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

The City located and screened another 35 outfalls/interconnections this period found as part of its investigations to address data gaps in the mapping. In cases where an outfall could not be found, or was inaccessible, the upgradient catch basin or manhole was inspected for dry weather flows as a proxy for the outfall. The City has a number of long culverted streams where stormwater drainage networks discharge directly into the culvert at a junction structure such as a manhole or catch basin. The junction structure discharge points into the culverted stream are mapped as outfalls.

Catchment Investigations

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

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

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

Number of catchment investigations completed this reporting period: 81

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

Percent of total catchments investigated: 66

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

To date, the City has completed 450 catchment investigations, 81 of which were completed this period and the remainder completed during previous years, many of which include catchments that do not have key junction manholes and/or SVFs. The number of catchment investigations reported as complete is less than that reported in 2025, primarily due to determining that some of these catchment areas have SVFs that will require wet weather sampling before the catchment investigation is considered complete. The City is continuing its review of records to identify all potential catchment areas with SVFs, while progressing with sampling in areas with identified SVFs. The SVF analysis is included in the appendix to the IDDE Plan on the City's website at https://www.manchesternh.gov/Departments/Sewer-and-Stormwater/Stormwater/Stormwater-Management-Program.

IDDE Progress

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

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

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

Number of illicit discharges identified: 3

Number of illicit discharges removed: 2

Estimated volume of sewage removed: 50 gallons/day

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

Total number of illicit discharges identified: 6

Total number of illicit discharges removed: 6

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

Three illicit discharges were identified this period:
1) 40 Ronald Street - sewer connection to drain located upstream and within the same drainage area as the illicit discharge removed from Residences of Riverwalk at 555 South Commercial Street. It was found and

removed this period. The investigation report is attached.
2) 1784 Candia Road - washing machine discharge to drain. It was found and removed this period. The investigation report is attached.
3) 107 Hollis Street - broken sewer line seeping into a private catch basin in the CSO area. It was found this period and repaired in August 2025. The investigation report is attached.

Employee Training

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

Employee training was conducted on May 21, 2025 at the Manchester Highway Department offices at 475 Valley Street. Training focused on water pollution, MS4 permit requirements, IDDE program requirements, illicit discharge investigations, sanitary sewer overflows, good housekeeping, erosion and sediment controls, operations and maintenance, and management of street wastes. 20 city employees from DPW-EPD attended the training. The training log will be included in the next update of the Illicit Discharge Detection Plan posted on the City's Stormwater website.
Employee training was conducted on May 29, 2025 at the Bridge Street Maintenance Center. Training focused on Water Pollution, MS4 Permit Requirements, and the Stormwater Pollution Prevention Plan. Five city employees from Parks and Recreation and EPD attended the training.

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: 18

Number of inspections completed: 335

Number of enforcement actions taken: 0

Optional: Enter any additional information relevant to construction site plan reviews, inspections, and enforcement actions:

The City completed 18 plan reviews for development/redevelopment projects with land disturbance. The City performed 214 site inspections and received 121 inspection reports prepared by third party inspectors for a total of 335 site inspections.

When performing construction site inspections, the City discusses any observed issues with the Contractor at the time of the inspection. These are resolved through the inspection process, limiting the need for formal enforcement actions. Of the 214 site inspections performed by the City, minor issues were noted during 19 of the inspections and resolved with the Contractor. One major issue was observed and also resolved with the Contractor without the issuance of a Notice of Violation.

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

As-built Drawings

Below, report on the number of as-built drawings received ***during this reporting period****.*

Number of as-built drawings received: 0

Optional: Enter any additional information relevant to the submission of as-built drawings:

Planning receives a certified engineer's letter documenting any changes in development from the design plans for subdivision and site plan review projects at the conclusion of construction activities. The City is continuing to work on internal protocols to improve coordination, receipt of as-builts, and tracking between departments. Two as-builts have been received so far in FY26.

Street Design and Parking Lots Report

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

Manchester Planning and Community Development is in the process of creating a land use code that will assemble a new zoning ordinance, new subdivision regulations, and new site-plan regulations in one document. The first public draft of the new Manchester Zoning Ordinance was released in June 2024 and incorporated the following recommendations from the MS4 LID regulatory review completed in Year 4:

-Cluster development - allows and provides criteria for cluster development and ownership and maintenance of open space.
-Driveway width - widths are now specified based on whether single-lane or double-lane driveway. The minimum width has been reduced.
-Shared driveways - allows shared driveways.
-Parking lot spaces - the minimum number of required parking spaces has been reduced for many uses.
-Parking lot landscaping requirements - lots with 20 or more parking spaces require 10% of the area to be planted with landscape with requirements on the number and spacing of shade trees. The interior landscape shall be integrated with on-site stormwater management facilities.

The second draft was published on August 8, 2025. The proposed zoning ordinance will be submitted to the Board of Mayor and Aldermen for their consideration at their October 7 meeting. Revisions to Subdivision & Site Plan Review Regulations will follow in future years.

Green Infrastructure Report

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

One MS4 LID regulatory review report was completed to address Street Design and Parking Lots and Green Infrastructure. All proposed updates are discussed under Street Design and Parking Lots Report above.

Retrofit Properties Inventory

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

The properties evaluated and identified for municipal retrofits can be found in Appendix F of the SWMP at https://www.manchesternh.gov/Departments/Sewer-and-Stormwater/Stormwater/Stormwater-Management-Program.

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

No municipal properties were modified or retrofitted with BMPs this period. The City has a $3.0 million drainage improvement construction contract currently in progress, which includes stormwater treatment BMPs at two schools: Memorial High School and the Manchester School of Technology. These properties were identified for municipal retrofits and are also located within the Nutt Pond and Pine Island Pond watersheds, which have phosphorus TMDLs. Additionally, construction of a stormwater bioretention system at the Piscataquog Boat Ramp is underway under the City's CMOM C5 contract, which discharges to Namaske Lake and ultimately the Merrimack River. Beginning in FY27, the City will have $3-$5 million in construction funds every two years for drainage improvement projects, including infrastructure repair and replacement, and installation of stormwater treatment BMPs with priority given to failing infrastructure and safety issues. This is in addition to the $300+ million over 20 years the City is spending on sewer separation and WWTF upgrade projects to reduce pollutants to surface water from these sources. The City is currently working on its Christian Brook sewer separation project and has incorporated stormwater treatment BMP designs at four locations. These will serve as demonstration projects for future separation and roadway improvement projects.

MCM6: Good Housekeeping

Catch Basin Cleaning

Below, report on the number of catch basins inspected and cleaned, along with the total volume of material removed from the catch basins ***during this reporting period****.*

Number of catch basins inspected: 458

Number of catch basins cleaned: 400

Total volume or mass of material removed from all catch basins: 117 [Select Units]

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

Total number of catch basins: 8,604

If applicable:

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

The City cleans its catch basins by Ward and there are approximately 12,000 catch basins in the City (8,604 in the MS4 and the remainder in the combined sewer area). Catch basins in the combined sewer area are also inspected and cleaned as part of the on-going program. To remain within the City's catch basin cleaning budget, approximately two Wards out of 12 are cleaned each year. The City also has designated priority areas around its urban ponds, where 558 catch basins are cleaned on a more frequent basis at a minimum of once every two years.

The City began its second round of catch basin cleaning by Ward in Year 5. Two rounds of cleaning records have been mostly collected for six Wards as of Year 7. The City plans to continue cleaning by Ward until two full rounds of data are available for the City. This data will then be analyzed to develop optimized catch basin cleaning routes within the City's budget. The data is also being evaluated to identify catch basins with no and very small sumps for potential upgrade as part of the City's paving program and drainage improvement program.

Street Sweeping

*Report on the number of miles swept **during this reporting period** below.*

Number of miles cleaned: 2,442

*Report either the volume or weight of street sweeping materials collected **during this reporting period** below.*

- (•) Volume of material removed: 1,900 cubic yards
- ( ) Weight of material removed: [Select Units]

Stormwater Pollution Prevention Plan (SWPPP)

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

Number of site inspections completed: 4

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

Four inspections were completed for the Bridge Street facility. A SWPPP is being finalized for the Dunbarton Road and Straw Road catch basin cleaning and street sweeping storage locations. Storage at these facilities is inspected informally during routine operations and will be formalized into quarterly inspections as part of the final SWPPP.

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):

https://www.manchesternh.gov/Departments/Sewer-and-Stormwater/Pond-Restoration/Water-Quality-Data

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:

Water quality testing of five Manchester ponds is performed under the State's Volunteer Lake Assessment Program (VLAP). VLAP establishes a volunteer-driven lake sampling program to assist NHDES in evaluating lake water quality, and provides volunteer monitors and lake residents with reports on lake health. Ponds tested under the program include Crystal Lake, Dorrs Pond, Nutt Pond, Pine Island Pond and Stevens Pond, which are monitored for alkalinity, Chlorophyll-a, Chloride, Color, Conductivity, Total Phosphorus, Transparency, Turbidity and pH. Annual reports of the monitoring results are posted on the City's and NHDES's websites.

Additional Information

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

-MCM3: SSOs - 16 of the 17 SSOs reported are associated with the CSO system and will be addressed with the City's CSO program. One SSO was the result of a grease blockage in the sewer line, which was removed.
-MCM6: CB Cleaning - The reported number of catch basins inspected and cleaned under MCM6 includes catch basins within and outside of the City's MS4. The City has approximately 12,000 catch basins that it cleans on a rotating cycle. Approximately 8,604 of these are part of the MS4. The volume of catch basin cleaning material removed is estimated based on the depth of sediment measured in each catch basin. The accumulated stockpile materials are measured at the time of screening.
-MCM6: Street Sweeping - The reported miles of streets swept represent lane miles and include City streets within and outside of the City's MS4 and also accounts for multiple sweepings of the same road.
-Other Stormwater Programs - The City has prepared a prioritized list of maintenance and repair projects using information collected from its MS4 drainage infrastructure inspection and cleaning program, from other City initiatives to inspect and evaluate culverts and channels, and from resident service requests. The list includes: stormwater piping and outfalls in need of jetting to remove sediment; repairs to damaged catch basins, culverts, outfalls and headwalls; culvert replacements; channel maintenance needs; and flooding/ capacity issues. Repair and maintenance of these structures can help prevent erosion, flooding and road damage that can impact water quality and cost more to address once they become a problem, while also ensuring the safety of Manchester's residents.

Year 8

Activities Planned for Next Reporting Period

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

Yes, I agree ☒

Annual Requirements

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

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

Part V: Certification of Small MS4 Annual Report 2025

40 CFR 144.32(d) Certification

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

Name: Robert J. Robinson Title: Chief Engineer

Signature: Robert J. Robinson Date: 9/29/25

[Signatory may be a duly authorized representative]