

New Hampshire Small MS4 General Permit

EXISTING PERMITTEES

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

Town of Merrimack, NH

EPA NPDES Permit Number NHR041018

Certification of Small MS4 Year 7 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: Leo Laviolette
Title: Deputy DPW Director/Environmental
Signature: 
Date: 9/22/2025

Authorized Representative:

The authorization letter is:

Attached to this document (document name listed below):

Attachment 1A – Authorization Letter

Publicly available at the website:

N/A

Primary MS4 Program Manager Contact Information:

Name: Leo Laviolette	Title/Position: Deputy DPW Director/Environmental	
Department: Public Works Department – Administration and Engineering Division		
Street Address: 6 Baboosic Lake Road		
City: Merrimack	State: New Hampshire	Zip Code: 03054
Email: llaviolette@merrimacknh.gov	Phone Number: 603-424-5137	

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, 2024, through June 30, 2025**, in accordance with the Permit.

Please do not attach any documents to this form. Instead, attach all requested documents to an email when submitting the form. Also ensure that any websites included on this form are to publicly accessible sites and that links are correct and valid.

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.

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 Town of Merrimack Stormwater Management Program Plan (SWMP) and Illicit Discharge Detection and Elimination (IDDE) Plan. Those documents and other pertinent Year 7 information can be found in submission or at the following websites, and will be referred to throughout this report:

SWMP: Located at Town Hall, 6 Baboosic Lake Road, Merrimack, NH and here:
https://www.merrimacknh.gov/sites/g/files/vyhlif3456/f/uploads/1_swmp.pdf

Date SWMP was Last Updated: 6/30/2020 (SWMP is being updated to include new Town Code and Construction Standards, but not complete)

IDDE Program Plan: See Attachment 2 to this Annual Report

Updated System Map See <https://www.merrimackgis.org/app/> For more information, please contact the Merrimack Department of Public Works Administration/ Engineering Division. The link is the public access GIS based system map and updated periodically throughout the year. The private GIS system has the Stormwater layer accessible. The Town of Merrimack has received a CWSRF Asset Management grant for Stormwater that will be used in part to enhance our stormwater system map.

Updated SSO Inventory: See Page 14 for Information.

Updated Inventory and Ranking of Outfalls/Interconnections: See Attachment 4A – Inventory of Outfalls Priority Ranking

Dry Weather Screening Data: Not Applicable – No Dry Weather Screening performed in Year 7

Wet Weather Screening Data: Not Applicable – See Attachment 11. Five outfalls were sampled for Wet Weather Screening in Year 7

Catchment Investigation Data: See Attachment 11

System Vulnerability Factors: See Attachment 4B – Inventory of Outfalls System Vulnerability Factors.
Illicit Discharge Removal Report: See Pages 14-16 for Information and Attachment 3 for back-up.
Results from additional stormwater or receiving water quality monitoring reports or studies: Not Applicable

PTAP 2025 Nutrient Reduction Report: See Attachment 10

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

Updated Nitrogen Source Identification Report: N/A
PTAP 2025 Nutrient Reduction Report: See Attachment 10
Town of Merrimack Nutrient Tracking Program Report: N/A The Town uses the PTAP Program above

Updated Phosphorus Source Identification Report: See Attachment 6 – Phosphorous Source Identification Report
PTAP 2025 Nutrient Reduction Report: See Attachment 10
Town of Merrimack Nutrient Tracking Program Report: N/A The Town uses the PTAP Program above

Street Sweeping Schedule: [Annual Street Sweeping 2025 | Merrimack NH-](#)

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

Lake Phosphorus Control Plan: See Attachment 9.
PTAP 2025 Nutrient Reduction Report: See Attachment 10
Town of Merrimack 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 7 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)		
<input type="checkbox"/> Bacteria/Pathogens	<input type="checkbox"/> Chloride	<input type="checkbox"/> Nitrogen
<input checked="" type="checkbox"/> Phosphorus	<input checked="" type="checkbox"/> Solids/Oil/Grease (Hydrocarbons)/Metals	
TMDL(s)		
<input checked="" type="checkbox"/> Bacteria and Pathogens	<input type="checkbox"/> Chloride	<input checked="" type="checkbox"/> 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:

Pennichuck Brook – Witches Brook (2022) (added)

Muskrell Brook (2021) (added)

Baboosic Brook (McQuade) (added)

Various impairments added and/or delisted from existing impaired water bodies as shown in Attachment 7.

TMDL: N/A

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 1 outfall(s) have added.

A total of 0 outfall(s) have removed.

No

The Town of Merrimack 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:

Not Applicable

Minimum Control Measures

MCM 1: Public Education

Total number of all MS4 related educational efforts completed ***during this reporting period:*** 5

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

No.

Yes. The Town of Merrimack has made changes by adding erosion and sediment control instructions to be distributed during contractor pre-construction meetings.

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 and Town of Merrimack website:
https://www.merrimacknh.gov/sites/g/files/vyhlif3456/f/uploads/green_glass_clear_water.pdf.

Description:

Distribution and promotion of “Green Grass and Clean Water” **or** municipally created flyers. “Green Grass and Clean Water” materials were produced by UNH Cooperative Extension, NH Sea Grant, and NHDES outlining simple recommendations to keep lawns healthy while reducing water quality impacts - including proper fertilizer techniques and disposal of grass clippings.

Targeted Audience:

Residential and Business and Institutions

Responsible Department/Parties:

Department of Public Works

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 that were distributed ***during this reporting period:***

Year 7 = approximately 100 flyers

The flyers were displayed and available for residents to take at the Town Clerks office, Public Works Highway Division and DPW Administrations office as well as posted on the Town of Merrimack website:

https://www.merrimacknh.gov/sites/g/files/vyhlif3456/f/uploads/green_glass_clear_wa ter.pdf

Goal was achieved.

Message Date: 6/30/2025

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. Pet waste related flyers found on the Town of Merrimack website:
https://www.merrimacknh.gov/sites/g/files/vyhlif3456/f/uploads/dog_waste_brochure.pdf

Description:

Distribution and promotion of “Every Drop” municipally created brochures with educational information about proper pet waste management, impacts of improper management, pet waste ordinance, and disposal requirements messaging.

The brochures were distributed with pet licenses at the Town Clerks Office. Additionally, a video infomercial was created by and aired by Merrimack TV, which was also aired during programming periodically this year.

Targeted Audience:

Residents - Pet Owners

Responsible Department/Parties:

Department of Public Works

Measurable Goal(s):

Dog owners and/or 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.

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

Year 7 = 4,700 brochures were distributed with dog licenses.

Goal was achieved.

Message Date: Time of license renewal.

BMP: Disposal of Leaf and Grass Clippings

Outreach Resources:

Leaf and grass clippings related brochures found on the Town of Merrimack website:
https://www.merrimacknh.gov/sites/g/files/vyhlif3456/f/uploads/yard_waste.pdf

Description:

Distribution and promotion of municipally created brochures with messaging about impacts from yard waste to waterbodies, alternatives to dumping yard waste, and laws against dumping yard waste near or in waterbodies.

The Town of Merrimack has implemented a composting effort/program by supplying the composting bins for at a reduced rate, and allowing the public to drop off compostable materials at the Town Solid Waste Transfer Station. The Town of Merrimack also provides educational materials on the water quality benefits of composting, located at the Town Hall.

Targeted Audience:

Residential, Business and Institutions

Responsible Department/Parties:

Department of Public Works Administration and Solid Waste Division

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 brochures, that were distributed ***during this reporting period:***

Year 7 = approximately 50 brochures passed out at Town Hall.

And

Merrimack's Composting Campaign include onsite composting at the transfer station of approximately 4000 Cubic yards of yard waste per year and the sale of 4 composting bins ***during this reporting period.***

Goal was achieved.

Message Date: Year Round

BMP: Septic System Maintenance

Outreach Resources:

Septic system related brochures found on the Town of Merrimack website:

https://www.merrimacknh.gov/sites/g/files/vyhlif3456/f/uploads/ge_pumped_community_brochure.pdf

Description:

Distribution and promotion of the Get Pumped NH brochures, located on the Town of Merrimack website and distributed at the Wastewater Treatment Facility, 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 New Hampshire Department of Environmental Services (NHDES).

Additionally, separate messages regarding septic system maintenance were posted on the Town Website and Town social media during NHDES Septic Smart Week.

Targeted Audience:

Septic System Owners

Responsible Department/Parties:

Department of Public Works Administration and Wastewater Division

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 7 = approximately 50 brochures

Goal was achieved.

Message Date: 6/30/2025

BMP: Construction/Developers Outreach

Outreach Resources:

The Town of Merrimack sent out individual letters via email and traditional mail to developers, engineers, construction companies and large organizations in town. A copy of the letter and the mailing list is attached in Attachment 1B – Outreach Letter 2025.

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.
- 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 Companies and Developers

Responsible Department/Parties:

Department of Public Works Administration

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 7 = 31 of CGP fact sheets (via link)

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

Year 7 = 31 of letters

The Town of Merrimack held 4 pre-construction meetings, representing 100% of projects that received planning board approval and began construction ***during this reporting period***.

Goal was achieved.

Message Date: 5/9/2025

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

Not Applicable.

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 Town of Merrimack SWMP.
- Kept records relating to the permit 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 annual Town Council Meeting (October 10, 2024). The Town Councilors and the public were given opportunity to ask questions and comment on the plan. Documents and records relating to the permit are retained and available to the public at Merrimack Town Hall and on the website

https://www.merrimacknh.gov/sites/g/files/vyhlif3456/f/minutes/tcm_241010_-final.pdf

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

No.

Yes. Merrimack made the following changes: N/A.

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

The Town of Merrimack has conducted the following public involvement or participation opportunities:

Hazardous Waste Collection Day – The Town of Merrimack participates in the Nashua Region Soil Waste Management District (NRSWMD) Household Hazardous Waste Program. This is a program funded by municipal assessments, user fees, and a grant received by the Nashua Regional Planning Commission from the NHDES.

Adopt A Road – Adopt-a-Road allows individuals, organizations, or businesses to “adopt” all or parts of Town roads for the purpose of litter pick-up. Sponsors are asked to perform their

roadside litter clean-up every spring and fall. This effort helps to keep litter and debris from the town stormwater system.

Rain Barrel and Compost Bin Sales through DPW Solid Waste Division – Residents are encouraged to collect and re-use stormwater on their properties that would otherwise flow to into the drainage system. Composting is also encouraged. Rain barrels and compost bins are for sale to the public at the DPW Solid Waste Facility.

Touch and Truck / 1st Grade Field Trip – The 1st graders in town come the Highway Garage to see the trucks and heavy equipment used in day-to-day maintenance at the Town of Merrimack. The kids get demonstrations on the EnviroScape Table and learn how the town utilities work, such as the stormwater collection system. We pass out the MCM #1 brochures at this even to all interested kids and parents.

Individual Resident Calls: The DPW Administration department addresses daily inquiries of questions and concerns regarding stormwater, water quality and drainage issues around Town.

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

Not Applicable.

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*. *See notes below.*
- The SSO inventory has been updated, including the status of mitigation and corrective measures implemented or was addressed and can be found in N/A.

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

- MS4 System Map was updated ***during this reporting period:***
 - Percent of Phase 1 elements incorporated into MS4 System Map: 100 Percent of Phase 1 system mapping completed as of June 30, 2025.
 - Percent of Phase 2 elements incorporated into MS4 System Map: 0 Percent of Phase 2 system mapping completed as of June 30, 2025.
- MS4 System Map was updated in Year(s) Two and there were no updates in Year 7.
- The Town of Merrimack's MS4 System Map is continually updated to incorporate findings and changes from catchment investigations.

Describe any additional details regarding phase 1 and phase 2 MS4 System Mapping requirements, in the box below:

Not Applicable.

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 ##website link.

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

Number of outfalls/interconnections screened ***during this reporting period:*** 0

Percent of total known outfalls/interconnections screened ***to date (Year 1 – Year 7):*** 94.7%

The inventory and ranking of outfalls/interconnections was not updated during Year 7 because outfalls/interconnections were not inspected.

Describe any additional details regarding dry weather screening requirements, in the box below:

However the revised inventory and ranking of outfalls/interconnections from Year 5 can be found in Attachment 4A – Inventory of Outfalls Priority Ranking.

Wet Weather Screening

- No outfalls/interconnections were inspected for wet weather screening ***during this report period.***
- Wet weather outfall/interconnection screening data can be found: N/A

Percent of total known Problem Outfalls and outfalls/interconnections that identify sewer input screened ***to date (Year 1 – Year 7):*** 2.44%

Percent of total known outfalls/interconnections screened ***to date (Year 1 – Year 7):*** 94.7%

Catchment Investigations

- No catchment investigations were inspected for wet weather screening ***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 ***during this report period,*** and data can be found Attachment 11.

Number of catchment investigations ***during this reporting period:*** 1. 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.

Percent of total Problem Catchment and outfalls/interconnections that identify sewer input investigated ***to date (Year 1 – Year 7):*** 0%

Percent of total catchments investigated ***to date (Year 1 – Year 7):*** 3.7%

Describe any additional details regarding catchment investigations requirements, in the box below:

Catchment Area Investigation was conducted in an area that was already investigated once before and therefore the percentages are not re-counted. However one investigation led to an IDDE removal.

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: N/A.

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

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

Estimated gallons of flow removed ***during this reporting period:*** 0.5 gallons/day

Total number of illicit discharges identified ***since the effective date of the permit (July 1, 2018 – June 30, 2025):*** 3

Total number of illicit discharges removed ***since the effective date of the permit (July 1, 2018 – June 30, 2025):*** 3

Describe any additional details regarding illicit discharge requirements, in the box below:

During wet weather sampling, E-coli samples were found to be extremely high. DPW staff had communication with the property manager at a nearby housing area that's tied into the stormwater system. During the conversations, it was found that residents were leaving pet waste in the catch basins within the housing development. The property development manager sent letters and is enforcing the "No Pet Waste" in catch basins rule.

Employee Training

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

The Town of Merrimack held an IDDE training session for municipal staff. In addition, the Town of Merrimack 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. Training logs are included in Appendix F of the IDDE Program Plan.

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

The Town of Merrimack attempts to inspect and sample outfalls (specifically high priority outfalls) for both dry weather and wet weather sampling. Five wet weather samples were conducted in Year 7 as shown in the attachments.

In addition, The Town of Merrimack passed a new Town Code relative to IDDE detection, investigation and removal (Town Code 168) and is attached in Attachment 3. This was passed in November 16, 2023.

SSOs that were reported through the Town of Merrimack Wastewater Division to the EPA have not been included in this report.

New employee training includes training on several pieces of equipment for maintenance of the catch basins and detention basins in town. In addition, all employees were trained on calibrating the salt spreaders to reduce salt usage during winter maintenance.

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:*** 13 (many multiple reviews)

Number of inspections completed ***during this reporting period:*** 153 (2 sites with periodic activity)

Number of enforcement actions taken ***during this reporting period:*** 0

The Town of Merrimack 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:

Additional Details:

The Town of Merrimack Stormwater Regulations (Town Code 167) requires that all contractors or owners that disturb 20,000 sqft or more, must submit a SWMP and provide weekly inspection reports and inspection reports after every 0.25 rain event. These owner inspections are not included in the numbers above. The numbers shown above are only for Town personnel performed site inspections.

In addition DPW Administration/Engineering staff visit each site on a regular basis (weekly when possible). Highway Division crews are trained in erosion and sediment control, and asked to report to DPW Administration/Engineering when issues are observed.

The Town of Merrimack works hard to prevent issues from arising to the point of enforcement. Before issues arise, the Town identifies potential areas of improvement and works with the contractor to prevent minor issues from becoming major issues or compliance failure. By communicating with the contractors and having a regular presence on sites, minor issues are quickly resolved as a solution to prevent major issues.

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

As-built Drawings

Number of as-built drawings received *during this reporting period*: 5

Local Regulations Assessment Report

- The **Assessment Report** was evaluated and no updates were recommended *during this reporting period*.
- The **Assessment Report** was evaluated and updates were recommended *during this reporting period*.
- No updates were made *during this reporting period* because all required updates have been made to make low impact designs allowable as outlined in the **Assessment Report**.

Street Design, Parking Lots, and Creation of Impervious Cover

- No updates were made or planned to be made to **Local Regulations and/or Guidelines** that affect the creation of imperious cover *during this reporting period*.
- Updates were recommended **and/or** planned to be made to **Local Regulations and/or Guidelines** that affect the creation of imperious cover *during this reporting period*.
- 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

- No updates were made or planned to be made to Local Regulations regarding green infrastructure practices *during this reporting period*.
- Updates were recommended **and/or** planned to be made to **Local Regulations** regarding green infrastructure practices *during this reporting period*.
- 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

The Town of Merrimack has identified the remaining 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: See Attachment 5 – Inventory and Priority Ranking Hot Spots Merrimack

List of Non-MS4 Properties: N/A

The Town of Merrimack has modified or retrofitted the following MS4 **and/or** Non-MS4 properties with BMPs to mitigate impervious area that were inventoried as part of 2.3.6.e of the permit. Following is a list of the properties that were modified or retrofitted as well as the type of BMP(s) that were implemented:

List of MS4 Properties: N/A

List of Non-MS4 Properties: N/A

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

An inventory and priority ranking sheet (Attachment 5) was developed for the Town owned properties, however no new properties were added to the list and no BMPS added to the existing properties to change the priority levels.

The Town of Merrimack was authorized for CWSRF funding in 2023 for the Baboosic Lake/Pine Knoll Shores Drainage Project, which includes the addition of multiple BMPs, to advance the project to final design which is under contract and begun this year.

Additional BMPS for Town owned properties are dependent upon tax payer funding and budget in Year 8. The residents of the Town voted down the municipal budgets for the 2024/2025 and 2025/2026 year time frame. Therefore the Town has had to go into a default budget that has tied our hands in project costs. Our funding resources are now greatly restricted and we have been stretching every dollar as much as possible. However, some projects for retrofitting have been placed into the Town Capital Improvements Plan to obtain funding in future years when it becomes available again.

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:
 - A schedule for catch basin cleaning has been established with the goal of ensuring that a catch basin should not be more than 50% full.

Number of catch basins inspected ***during this reporting period:*** 1872

Number of catch basins cleaned ***during this reporting period:*** 1872

Total volume **or** mass of material removed from **all** catch basins ***during this reporting period:*** 1747 Tons

Total number of catch basins within the MS4 system: Approximately 3700

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:*** 362

Mass of swept material ***during this reporting period:*** 777 Tons

Stormwater Pollution Prevention Plan (SWPPP)

The Town of Merrimack has 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.

Number of site inspections completed for ***during this reporting period:*** 2

Number of corrective actions taken ***during this reporting period:*** 0

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

No corrective actions necessary.

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 7.
 - 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:

The Town of Merrimack also performed the following:

- A new roof was installed on the Highway Department salt shed in Year 6.
- The Highway Department is decreasing total salt usage by increasing the usage of salt brine for ice control.
- The Highway Department is decreasing the usage of rock salt on the roads in order to be proactive in avoiding a chloride impairment and reduce groundwater contamination from chlorides.

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:

Not Applicable.

Chloride Impairment (Appendix H)

- Permittee **does not** have a chloride impairment.
- Permittee **has** a chloride impairment.
 - Fully implemented Salt Reduction Plan which can be found: N/A

The Municipal Green SnowPro Certification Program's (Program) rules and regulations were approved and adopted in 2024. The Program anticipates they will be ready to accept voluntary applications from municipalities in fall of 2024.

- Reported amount of salt applied to all municipally-owned and maintained surfaces by completing the New Hampshire DES Annual Salt Usage reporting form and submitting it to NHDES, and can be found: N/A. The UNH Technology Transfer Center online tool is non-functional and has been for several years.

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

The Town of Merrimack Highway Department has increased the use of brine on the roads to reduce the salt usage. In addition, the Town has reduced road salt usage to avoid chloride impacts to the groundwater and wells.

Nitrogen Impairment (Appendix H)

- Permittee **does not** have a nitrogen impairment.
- Permittee **has** a nitrogen 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.***

Nitrogen Source Identification Report- Update

Structural BMPs

- The Nitrogen Source Identification Report was reviewed and there were no updates required ***during this reporting period*** because there were no revisions. The Nitrogen Source Identification Report can be found: N/A.
- The Nitrogen Source Identification Report was ***updated during this reporting period*** and can be found: N/A. An updated list of the planned structural BMPs and a plan and schedule for implementation can be found in *Section 2: Potential Structural BMPs Report (Year 5) part I.1.c.ii* of the Nitrogen Source Identification Report.
- The Town of Merrimack 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.*** The Town of Merrimack plans to install structural BMPs in 2026 with a water quality project at Baboosic Lake.
- The Town of Merrimack 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, ***but the structural BMP was installed after the end of this reporting period.*** The structural BMP(s) was installed on N/A. The type of structural BMP(s) that was installed was N/A. Information

regarding the installed BMP(s) can be found in *Section 2: Potential Structural BMPs Report (Year 5) in Part I.1.c.iii* of the Nitrogen Source Identification Report.

- The Town of Merrimack 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 N/A. Information regarding the installed BMP(s) can be found in *Section 2: Potential Structural BMPs Report (Year 5) in Part I.1.c.iii* of the Nitrogen Source Identification Report.
- Structural BMP(s) listed in Attachment 3 to Appendix F already existing or installed in the regulated area by The Town of Merrimack or its agents was tracked and the nitrogen 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 nitrogen removed in mass per year by the BMP(s) were documented in **PTAP 2025 Nutrient Reduction Report - Attachment 10**. The total estimated nitrogen removed from the installed BMP(s) is **2262.69 lbs/year**.

The Town of Merrimack 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 Town of Merrimack 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 The Town of Merrimack or its agents was tracked and the nitrogen 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 nitrogen removed in mass per year by the BMP(s) were documented in **The Town of Merrimack Tracking Program**. The total estimated nitrogen removed from the installed BMP(s) is 0 lbs/year.
- No BMPs were installed **during this reporting period**. The implementation schedule is outlined in *Section 2: Potential Structural BMPs Report (Year 5) in Part I.1.c.i* of the Nitrogen Source Identification Report. The total estimated nitrogen 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:

Not Applicable.

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- Update

Structural BMPs

- The Phosphorus Source Identification Report was reviewed and there were no updates required **during this reporting period** because there were no revisions. The Phosphorus Source Identification Report can be found Attachment 5.
- The Phosphorus Source Identification Report was **updated during this reporting period** and can be found in Attachment 6. An updated list of the planned structural BMPs and a plan and schedule for implementation can be found in *Section 2: Potential Structural BMPs Report (Year 5) part II.1.c.ii* of the Phosphorus Source Identification Report.
- The Town of Merrimack 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**. The Town of Merrimack plans to install structural BMPs in 2026 with a water quality project at Baboosic Lake.
- The Town of Merrimack 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, **but the structural BMP was installed after the end of this reporting period**. The structural BMP(s)

was installed on N/A. The type of structural BMP(s) that was installed was N/A. Information regarding the installed BMP(s) can be found in *Section 2: Potential Structural BMPs Report (Year 5) in Part II.1.c.iii* of the Phosphorus Source Identification Report.

- The Town of Merrimack 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.**
- Structural BMP(s) listed in Attachment 3 to Appendix F already existing or installed in the regulated area by The Town of Merrimack 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 2025 Nutrient Reduction Report - Attachment 10**. The total estimated phosphorus removed from the installed BMP(s) is **632.76lbs/year.**

The Town of Merrimack 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 Town of Merrimack 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 The Town of Merrimack 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 **The Town of Merrimack Tracking Program**. The total estimated phosphorus removed from the installed BMP(s) is 0 lbs/year.
- No BMPs were installed **during this reporting period***. The implementation schedule is outlined in *Section 2: Potential Structural BMPs Report (Year 5) in Part II.1.c.i* of the Phosphorus Source Identification Report. 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:

The Town of Merrimack spent Year 7 catching up on existing system mapping updates, system repair, sampling, and PTAP data entry in order to better understand the current conditions in town. As shown above, the existing BMPs in Town remove a significant amount of nitrogen and phosphorous.

Merrimack has applied for and received a loan from the Clean Water State Revolving Fund (CWSRF) to complete the design of the Pine Knolls Shores catchment area along Baboosic Lake. Selecting and contracting a consultant has been the primary focus this year after the funding award. The design phase has begun in Year 7 and continues in Year 8. Field investigation is currently underway. The goal of this project is to remove the sediment and nutrients that are washing into Baboosic Lake by paving a network of gravel roads, installing drainage, and installing stormwater treatment facilities (infiltration ponds, tree boxes and rain gardens.

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

- Permittee **does not** have a solids, oil and grease, or metals impairment(s).
- Permittee **has** a solids, oil and grease, or metals impairment(s).
 - Increased street sweeping frequency of all municipal owned streets and parking lots to a schedule that targets areas with potential for high pollutant loads **during this reporting period**. The Town of Merrimack street sweeping schedule can be found [Annual Street Sweeping 2025 | Merrimack NH](#)

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

Due to budget constraints the second street sweeping was not performed in the fall of 2024. The tax payers elected not to approve the municipal budget for the Town of Merrimack. This has caused the Town to go into a much reduced default budget. Additional items such as extra street sweeping had to be removed from the budget. This maintenance is performed by outside contractors and must be paid for using the operating budget of the Public Works Department.

The Town of Merrimack has hired a new drainage foreman this year who has focused on maintenance of drainage structures. Catch basin cleaning has significantly increased this year with the new foreman.

Merrimack would like to point out that sand for snow and ice control is no longer used, which has contributed to a decrease in swept material from the roads and collected from catch basins. Additionally, the Town has also begun to implement a brining system and wetted salt system which will further reduce chlorides (by reducing the total amount of salt used) that enter the MS4 system.

Chloride TMDL (Appendix F)

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

Permittee **has** a chloride TMDL.

Fully implemented Chloride Reduction Plan which can be found: N/A.

The Municipal Green SnowPro Certification Program's (Program) rules and regulations were approved and adopted in 2024. The Program anticipates they will be ready to accept voluntary applications from municipalities in fall of 2024.

Reported amount of salt applied to all municipally-owned and maintained surfaces by completing the New Hampshire DES Annual Salt Usage reporting form, submitting it to NHDES, and can be found: N/A. The UNH Technology Transfer Center online tool is non-functional and has been for several years.

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

Even though the Town does not have a Chloride TMDL, we are taking many steps to ensure the reduction of chlorides that enter the surface and groundwater in town. These changes include: staff training, increased use of brine instead of rock salt, and regular calibration of the spreading equipment.

Lake and Pond Phosphorus TMDL (Appendix F)

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

Lake Phosphorus Control Plan Reporting Requirements

- The LPCP was submitted in a previous annual report.
- The LPCP can be found at Town Hall and within Attachment 12.

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

The Town of Merrimack has **not fully completed the Year 5 requirements** of the written Lake Phosphorus Control Plan **during this reporting period**. The partially completed plan can be found in Attachment 9. The plan is available to the public at Town Hall and within Attachment 12. The Town of Merrimack has completed the following sections of the written Lake Phosphorus Control Plan **during this reporting period**:

- Description of Planned Non-structural Controls
- Description of Planned Structural Controls
- Description of Operation and Maintenance (O&M) Program
- Implementation Schedule
- Cost and Funding Source Assessment

The Town of Merrimack plans to continue working on completing the outstanding items noted above in Years 8 & 9 based upon the Pine Knoll Shores Project described above and working with the Town of Amherst to develop a single comprehensive LPSP for Baboosic Lake.

In addition the Town of Merrimack has been awarded a CWSRF loan for a drainage and watershed study for Horseshoe Pond which also has its own draft LPCP.

Baseline phosphorus export rate required from LPCP Areas (lbs/year)[A]: 1146.41

Total phosphorus reduction from all implemented nonstructural controls **during this reporting period** (lbs/year) [B]: 492.05

Total phosphorus reduction from all structural controls installed ***during this reporting period and all previous years*** (lbs/year) [C]: 140.72

Phosphorus load increase due to development incurred since baseline loading was calculated in lbs/year [D]: 0

The Town of Merrimack is utilizing a scaled back approach to Pbase recalculations with assistance from the UNH Stormwater Center. Due to limited funding and available mapping resources, The Town of Merrimack plans to update the Pbase 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 Pbase 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.

Current phosphorus export rate from the LPCP Area in lbs/year [=A-(B+C)+D from above]:
513.64

Non-Structural Controls

- The Town of Merrimack has implemented all selected Lake Phosphorus Control Plan **non-structural control measure(s) during this reporting period** and documented the measure(s) and their phosphorus reductions. The **non-structural control measure(s)** are noted within the Town of Merrimack written Draft Lake Phosphorus Control Plan which can be found at Town Hall and within Attachment 12.

The Town of Merrimack is utilizing the Pollutant Tracking and Account Project, better known as PTAP, to track nutrient reductions associated with 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 Town of Merrimack 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 Controls

- The Town of Merrimack has **not** installed any **structural control measure(s)** within the Lake Phosphorus Control Plan area **during this reporting period or during previous reporting periods**. Therefore The Town of Merrimack has not documented the location, phosphorus reduction in mass/year, and date of last completed maintenance and inspection for each installed control within the written Lake Phosphorus Control Plan.
- The Town of Merrimack has installed **structural control measure(s)** within the Lake Phosphorus Control Plan area **during this reporting period or during previous reporting periods**. The Town of Merrimack has documented the location, phosphorus reduction in weight/year, and date of last completed maintenance and inspection for each installed structural control measure(s). The documented information for each of the installed structural control measure(s) are noted within the written Lake Phosphorus Control Plan.

The Town of Merrimack is utilizing the Pollutant Tracking and Account Project, better known as PTAP, to track nutrient reductions associated with 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 Town of Merrimack 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.

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

The Town of Merrimack has completed portions of the items in the LCPC requirements, but is not complete. However Utilizing the Data from the LPCP Calculation sheets and PTAP data collected in Year 7, the Town of Merrimack is able to complete the phosphorous calculations above by combining both LPCP Pbase and utilizing the PTAP data.

In addition, the Baboosic Lake LPCP will be a coordinated document between the NH DES, the Town of Merrimack and the Town of Amherst. There will be coordinated effort to provide a comprehensive document and meaningful efforts to improve the lake water quality.

As described above, water quality improvements for Baboosic Lake (the Pine Knoll Shores Drainage Improvement Project) have been evaluated and will be entering into the next phase of design.

Water quality improvements for Horseshoe Pond are also in the preliminary conceptual planning stage with approved and secured funding through the CWSRF program.

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 not applicable.

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:

Not Applicable

Description of Any Changes in Identified BMPs or Measurable Goals

The Town of Merrimack 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

The Town will prioritize the completion of the LCPC and Phosphorus Source Identification Report in order to complete the requirements and come up to date for Year 8. The Town of Merrimack will also install a BMP feature on a town owned property. Additionally the water quality projects for Pine Knoll shore (Babooasic Lake) and Horseshoe Pond will continue forward to ultimately reduce pollutant loading in both waterbodies.

The Town of Merrimack will continue to implement activities in accordance with the permit and SWMP.

Also the Town of Merrimack will continue a campaign to inform the residents on ways they can help promote better water quality at Horseshoe Pond.