# Year 3 Annual Report

New Hampshire Small MS4 General Permit Reporting Period: July 1, 2020-June 30, 2021

\*\*Please DO NOT attach any documents to this form. Instead, attach all requested documents to an email when submitting the form\*\*

Unless otherwise noted, all fields are required to be filled out. If a field is left blank, it will be assumed the requirement or task has not been completed. Please ONLY report on activities between July 1, 2020 and June 30, 2021 unless otherwise requested.

## **Part I: Contact Information**

Name	of Municipality or Organi	zation: Town o	of Amh	erst			
EPA N	PDES Permit Number: N	HR014001					
Prima	ry MS4 Program Manag	er Contact In	format	tion			
Name:	Dr. Dean Shankle, Jr.			Title:	Town Adminis	strator	
Street	Address Line 1: 2 Main S	treet					
Street .	Address Line 2:						
City:	Amherst State: NH			Zip Co	ode: 03301		
Email:	dshankle@amherstnh.go	<b>V</b>		Phone Number: (603) 673-6041			
	water Management Prog Location (web address):	https://www.a			ublic-works/pa	ges/stormwater-ma	nnagement-
Date S	ate SWMP was Last Updated: Sep 27, 2019						
	SWMP is not available on	the web please	nrovic	de the nh	veigal 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: <a href="https://www.epa.gov/tmdl/region-1-impaired-waters-and-303d-lists-state">https://www.epa.gov/tmdl/region-1-impaired-waters-and-303d-lists-state</a>

Impairme	nt(s)			
	⊠ Bacteria/Pathogens	☐ Chloride	□ Nitrogen	
	⊠ Solids/ Oil/ Grease (Hydr	rocarbons)/ Metals		
TMDL(s)				
	□ Bacteria and Pathogen	☐ Chloride	□ Lake and Port	nd Phosphorus
			Cle	ear Impairments and TMDLs
you have co	off all requirements below the ompleted that permit requiren Additional information will be	<b>nent fully.</b> If you hav	e not completed a re	-
Year 3 Req	uirements			
☐ Insp	ected and screened all outfalls	/interconnections (ex	cluding Problem an	d Excluded outfalls)
□ wea	ated outfall/interconnection pr ther inspections as necessary -construction bylaw, ordinance permit requirements			
any additional impacts of attempt to Five of the Those were	If you would like to describe ponal information, and/or if any COVID-19, please identify the complete the requirement, and Town's outfalls were inspected of CF_BB_01, OF_BB_04, OF Map from August 2019.	of the above year 3 e requirement that coll reason the requirement in this reporting po	requirements could rould not be complete ent could not be congried for proper func	not be completed due to the ed, any actions taken to appleted below:
Annual Red	quirements			
Prov	vided an opportunity for public State Public Notice requireme	= = =	ew and implementar	tion of SWMP and complied
⊠ Kep	t records relating to the permit	t available for 5 year	s and made available	e to the public
IXI	SSO inventory has been updatemented	ted, including the sta	tus of mitigation and	d corrective measures
	• This is not applicable b	pecause we do not ha	ve sanitary sewer	
	C This is not applicable b		•	
	C The updated SSO inver	-		
	← The updated SSO invertible.	ntory can be found a	t the following webs	ite:

Properly stored and disposed of catch basin cleanings and street sweepings so they did not discharge to receiving waters
☑ Provided training to employees involved in IDDE program within the reporting period
☑ All curbed roadways were swept at least once within the reporting period
☑ Updated system map due in year 2 as necessary
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
Optional: If you would like to describe progress made on any incomplete requirements listed above, provide any additional information, and/or if any of the above annual requirements could not be completed due to the impacts of COVID-19, please identify the requirement that could not be completed, any actions taken to attempt to complete the requirement, and reason the requirement could not be completed below:  There is an existing SWPPP for the Town Transfer Station. SWPPPs for other permittee owned or operated garages, and public works yards will be prepared.  O&M programs for all permittee owned facilities will be implemented, along with the maintenance procedures identified as part thereof.  All MS4 infrastructure maintenance is being done as needed, including catch basin and pre-treatment inspections and cleanings - a program for this work will be designed.
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 $H$ and $F$ 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:

Due to the Covid-19 pandemic and Town Hall personnel working staggered schedules for public health and safety, along with the Town Hall being closed to the public, except by appointment through 2020, the annual messages and dissemination of materials to dog owners was not able to be done. Information regarding the proper management of pet waste is available in the Town Hall as brochures and posters, and is always available on the Town website. Pet waste stations are situated around town and are being used successfully and managed by the DPW. Additional stations have been added at Upper Wilkins and Davis Lane. These are not formal walking trails, but are both areas associated with schools and people congregate there with dogs. The pet waste stations are emptied weekly and volumes are trending upwards.

## **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 (se Appendix $H$ and $F$ 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)
Potential structural BMPs
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.
The BMP information is attached to the email submission
○ The BMP information can be found at the following website:

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:

Due to the Covid-19 pandemic and Town Hall personnel working staggered schedules for public health and safety, along with the Town Hall being closed to the public, except by appointment through 2020, the specific messages were not distributed. However, this information is always available on the Town website and as noted above, the pet waste stations in town are maintained and two new ones have been added. Potential structural BMPs will be identified and tracking tools developed.

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

#### **Annual Requirements**

Good Housekeeping and Pollution Prevention for Permittee Owned Operations

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

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:

## Lake and Pond Phosphorus TMDL

☐ Completed the funding source assessment

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:

Due to the Covid-19 pandemic and Town Hall personnel working staggered schedules for public health and safety, along with the Town Hall being closed to the public, except by appointment through 2020, this was not completed in Year 3 and will be done in Year 4.

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

Due to the Covid-19 pandemic and Town Hall personnel working staggered schedules for public health and safety, along with the Town Hall being closed to the public, except by appointment through 2020, it continued to be challenging to maintain all of the functions of the Office of Community Development. This includes providing support to all the Board and Commissions affected by the pandemic and keeping up with their statutory obligations for meetings while providing assistance to the public and reviewing applications and plans for subdivision and site plan review. Keeping up with the day to day requirements of the office remained a priority and several of the items from Year 3 that were not able to be completed will be undertaken in Year 4.

The update of the Stormwater Regulations has resulted in a robust regulation for review of stormwater management at the time of subdivision or site plan review. Additionally, a checklist has been added to all Community Development application forms, including building permit applications, requiring the applicant to evaluate their project and determine whether or not it meets the criteria of the Town to require a stormwater management plan. The Planning Board has been using their consulting engineer, Keach Nordstrom, to review all stormwater management plans and drainage reports prior to final approval of the applications. DPW continues to do a stellar job of managing stormwater during their regular operations at their facilities and on the Town roads.

## 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?

No
 No
 ■
 No
 No
 ■
 No
 No
 ■
 No
 ■
 No
 No
 ■
 No
 No

If yes, describe below, including any relevant impairments or TMDLs:

See the following link for the August 2019 outfall location update map on the Town website: https://www.amherstnh.gov/sites/g/files/vyhlif4116/f/pages/ms4\_outfall\_map.pdf

## 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:3

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: Amherst Town-wide Clean-Up Day

Message Description and Distribution Method:

Invitation to residents to participate in cleaning up town roads, parking lots or public areas. Town website and Facebook. This took place on Saturday, May 15, 2021.

Targeted Audience: Resid	lents
Responsible Department/I	Parties: Conservation Commission
Measurable Goal(s):	
	water quality can be maintained and improved by removing waste from the path of ags of litter/debris were removed from town roads, parking lots or public areas.
Message Date(s): 4/15/21	
Message Completed for:	Appendix F Requirements   ☐ Appendix H Requirements ☐
Was this message different	t than what was proposed in your NOI? Yes C No 6
If yes, describe why the ch	nange was made:

## **BMP: Household Hazardous Waste Collection**

Message Description and Distribution Method:

NRPC holds Household Hazardous Waste Collection days keep household waste from being improperly disposed of. Website and Facebook and a sign at the Transfer Station. DPW publicized results of the previous collection and highlighted Amherst's very good participation rates (the third highest participation rate in the NRPC region and over double the Town's regional population rate).

Targeted Audience: Residents

Responsible Department/Parties: NRPC & DPW

Measura	مالم	Goal	(6)	١.
Measura	oic	Goal	18	1.

To inform residents about the correct ways to dispose of household hazardous waste to avoid it entering the environment, including town wetlands, waterways and drainage systems.

Message Date(s): 5/7/21; 5/3/21

Message Completed for: Appendix F Requirements 

☐ Appendix H Requirements ☐

Was this message different than what was proposed in your NOI? Yes C No 6

If yes, describe why the change was made:

#### BMP: Shield your Field

Message Description and Distribution Method:

Give residents information on how to protect leach fields from shrubs and trees.

Targeted Audience: Residents

Responsible Department/Parties: DPW

Measurable Goal(s):

To inform residents on how to keep their leach fields from being impaired by shrub or tree roots if they are planted too close.

Message Date(s): 9/17/20

Message Completed for: Appendix F Requirements 

Appendix H Requirements

Was this message different than what was proposed in your NOI? Yes C No @

If yes, describe why the change was made:

#### BMP: National Public Works Week Coloring Contest

Message Description and Distribution Method:

Coloring contest to publicize National Public Works Week and introduce children to the concepts of public works including stormwater management.

Targeted Audience: Residents

Responsible Department/Parties: DPW

Measurable Goal(s):

Providing education and information to youth in a fun way and having participation from the community. Two children were selected as winners of the coloring contest and were each presented with a street sign with their name on it.

Message Date(s): 5/16/21; 5/17/21; 5/24/21; 6/25/21

Message Completed for: Appendix F Requirements 

Appendix H Requirements 

☐

Was this message different than what was proposed in your NOI? Yes C 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 posted on the Town of Amherst website. The Stormwater Regulations were updated in 2020 and adopted by the Planning Board and Board of Selectmen at fully noticed public hearings and following discussion of the updates at multiple public Planning Board meetings. Due to the Covid-19 pandemic and Town Hall personnel working staggered schedules for public health and safety, along with the Town Hall being closed to the public, except by appointment through 2020, updates to the SWMP were not made, but will be made in Year 4.

The dissemination of some educational messages in terms of mailings or flyers could not take place. However, the Town's Stormwater Management webpage has been active since 2019 and offers contact information for anyone who has any concerns to be able to get in touch with the Town. The Amherst Conservation Commission is very active in the community and provide an additional public venue for discussion of stormwater management at their meetings.

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

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

## 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: 0

Number of SSOs removed: 0

## **MS4 System Mapping**

Optional: Provide additional status information regarding your map:

#### Screening of Outfalls/Interconnections

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

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

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

Number of outfalls screened: 0

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

Percent of outfalls screened: 0

*Optional:* Provide additional information regarding your outfall/interconnection screening: No SSO = no SSO interconnections.

#### **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.

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

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

Number of catchment investigations completed this reporting period: 0

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

Percent of total catchments investigated: 0

Optional: Provide any additional information for clarity regarding the catchment investigations below: No SSO = no SSO interconnections.

#### **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
- C The illicit discharge removal report is attached to the email submission
- C The illicit discharge removal report can be found at the following website:

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

Number of illicit discharges identified: 0

Number of illicit discharges removed: 0

Estimated volume of sewage removed: 0

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: 0

Total number of illicit discharges removed: 0

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

No SSO = no SSO interconnections.

Emp	lov	ree	Tra	in	ing
ALLEY.	110	-			****

Describe the frequency and type of	employee	training c	conducted	during this	s reporting	period:
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Annual training, including, culvert maintenance, culvert installation, Green SnoPro, gravel road maintenance, IDDE. Training will be incorporated into the SWMP and posted to the website.

## 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: 2

Number of inspections completed: 75

Number of enforcement actions taken: 0

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

The Planning Board uses the Town's Consulting Engineer, Keach Nordstrom, to review stormwater management plans and drainage reports as part of subdivision and site plan review applications. The Town's Consulting Engineer inspects road construction projects, including drainage infrastructure installation, and erosion control. There were seven such inspections in the reporting period.

The DPW uses State of NH BMPs for erosion control and runoff and inspects municipal road construction/rehabilitation projects on a daily basis, Monday through Friday, along with the contractor and following a rain event. Should a rain event occur on a weekend, the contractor conducts an inspection of the project, a condition that is written into the contract.

The relationship between the DPW and area driveway contractors has matured and reduced the need for enforcement actions relative to driveway construction. Each driveway gets a pre-construction inspection with recommendations for the construction, and a post-construction inspection to confirm compliance. There were 64 such inspections in the reporting period.

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

	Redevelopment			
1 L 30 B				

As Duit Diamings	
Below, report on the number of as-built drawings receiv	ved during this reporting period
Number of as-built drawings received: 1	

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

As part of the compliance requirements for subdivisions and site plans, as-built drawings are required, to

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include drainage infrastructure. One such plan was submitted for a completed subdivision in the reporting period.

#### Street Design and Parking Lots Report

Describe the status of the street design and parking lots assessment due in year 4 of the permit term, including any planned or completed changes to local regulations and guidelines:

No action has been taken on this item in this reporting period, but will be addressed within the required permit timelines.

#### Green Infrastructure Report

Describe the status of the green infrastructure report due in year 4 of the permit term, including the findings and progress towards making the practice allowable:

No action has been taken on this item in this reporting period, but will be addressed within the required permit timelines.

## 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: 300

Number of catch basins cleaned: 250

Total volume or mass of material removed from all catch basins: 50 cubic yards

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

Total number of catch basins: 960

## If applicable:

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

Sump is vacuumed clean. Area is assessed to determine cause. If a point source is determined, actions are taken to remedy the source. In addition, we have implemented a salt/sand winter operations reduction program and reduced sand application throughout town by 70%. This was previously a significant factor in catch basin sump loading.

#### Street Sweeping

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

Number of miles cleaned: 10+

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

• Volume of material removed: 25

cubic yards

C 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: 52

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

As part of the SWPPP at the Transfer Station, a weekly inspection is performed. Vegetation has been cleared, a formal sample point with a safe standing area and a receptacle that holds all testing supplies has been installed, and storage areas have been moved to impervious surfaces.

#### **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
- C The results from additional reports or studies are attached to the email submission
- The results from additional reports or studies can be found at the following website(s):

If such monitoring or studies were conducted on your behalf or if monitoring or studies conducted by other entities were reported to you, a brief description of the type of information gathered or received shall be described below:

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

The Town of Amherst Planning Board, with assistance from the Amherst Conservation Commission and the Amherst Department of Public Works, updated the Stormwater Regulations which were adopted by the Planning Board on December 16, 2020, and by the Board of Selectmen on January 4, 2021. The update has resulted in a robust regulation for review of stormwater management at the time of subdivision or site plan review as well as for building permits. Additionally, a checklist has been added to all Community Development application forms, including building permit applications, requiring the applicant to evaluate their project and determine whether or not it meets the criteria of the Town to require a stormwater management plan. The Planning Board has been using their consulting engineer, Keach Nordstrom, to review all stormwater management plans and drainage reports prior to final approval of the applications. DPW continues to incorporate stormwater management during their regular operations at their facilities and on the Town roads.

All the Town's road salt storage piles were enclosed prior to this reporting period - the Green SnoPro program is implemented with equipment calibrations and training.

A newly acquired property, Buckmeadow, used for Recreation and Conservation was added to the inventory of permittee owned facilities.

Two treatment structures, a sediment trap at Nathan Lord Road and a catch basin/culvert infiltration practice at the Police Department, were inspected.

Additional pet waste stations have been added at Upper Wilkins and Davis Lane. These are not formal walking trails, but are both areas associated with schools and people congregate there with dogs. The pet waste stations are emptied weekly and volumes are trending upwards.

The DPW has a data driven approach to catch basin inspections and cleaning. Using historical data the DPW has created three lists of catch basins. The A list requires annual inspection, the B list requires inspection in odd years, and the C list requires inspection in even years. Thus, from the total of 960 catch basins, 300 were inspected in the reporting period and 250 were cleaned. The Town's reduced use of sand has also factored into this inspection and cleaning schedule.

All curbed roads and all bridges were swept in this reporting period, along with village roads.

#### **COVID-19 Impacts**

Optional: If any of the above year 3 requirements could not be completed due to the impacts of COVID-19, please identify the requirement that could not be completed, any actions taken to attempt to complete the requirement, and reason the requirement could not be completed below:

Due to the Covid-19 pandemic and Town Hall personnel working staggered schedules for public health and safety, along with the Town Hall being closed to the public, except by appointment through 2020, it was challenging to maintain all of the items requiring the Office of Community Development's attention. The provision of educational materials was limited regarding dog waste to residents as they could not access the Town Hall to license their dogs; public participation in meetings was suspended or limited at the start of the pandemic in accordance with the state of emergency; Office of Community Development employees were temporarily redirected from stormwater management documentation or procedural work to deal with land use board application backlogs, strategizing for online meetings and so on. The things that were not completed will be added to the Year 4 requirements.

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

## Yes, I agree ⊠

- Develop a report assessing current street design and parking lot guidelines and other local requirements within the municipality that affect the creation of impervious cover
- Develop a report assessing existing local regulations to determine the feasibility of making green infrastructure practices allowable when appropriate site conditions exist
- Identify a minimum of 5 permittee-owned properties that could potentially be modified or retrofitted with BMPs to reduce impervious areas

#### 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)

Provide any additional details on activities planned for permit year 4 below:

The Town of Amherst will continue to implement activities in accordance with the approved NOI.

# Part V: Certification of Small MS4 Annual Report 2021

#### 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: DEAN E. SHANKLE, JR Title: TOWN ADMINISTRATOR

Signature: Dan Ethorson Date: 09/29/21

[Signatory may be a duly authorized representative]