

Year 4 Annual Report
New Hampshire Small MS4 General Permit
Reporting Period: July 1, 2021 - June 30, 2022
Town of Wilton

EPA NPDES Permit Number NHR041044

Certification of Small MS4 Year 4 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

Title

Signature Date

Authorized Representative:

The authorization letter is:

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

- ☒ Publicly available at the website:

Primary MS4 Program Manager Contact Information:

Name: Nicholas Germain

Title/Position: Town Administrator

Department: Administration

Street Address: 42 Main Street

City: Wilton

State: New Hampshire

Zip Code: 03086

Email: wiltonta@wiltonnh.gov

Phone Number: 603-654-3299

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, 2021 through June 30, 2022** in accordance with the Permit.

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

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

Compliance activities have been identified and described in the Wilton Stormwater Management Plan (SWMP) and Illicit Discharge Detection and Elimination Plan (IDDE). Those documents and other pertinent Year 4 information can be found in submission or at the following websites, and will be referred to throughout this report:

SWMP:

https://www.wiltonnh.gov/UserFiles/Servers/Server_13599840/File/Government/MS4%20Stormwater/WiltonSWMP2019.pdf

Date SWMP was Last Updated: 2019

IDDE Program Plan (To be updated in 2022):

https://www.wiltonnh.gov/UserFiles/Servers/Server_13599840/File/Government/MS4%20Stormwater/Illicit%20Discharge%20Detection%20and%20Elimination%20Program.pdf

IDDE Enforcement Ordinance:

https://www.wiltonnh.gov/UserFiles/Servers/Server_13599840/File/9.22%20Draft%20Illicit%20Discharge%20Detection%20and%20Elimination%20Ordinance.pdf

SSO Inventory: No sanitary sewer overflows detected in the last 5 years. Inventory certification to be relocated to Written IDDE Program Plan in 2022.

https://www.wiltonnh.gov/UserFiles/Servers/Server_13599840/File/Government/MS4%20Stormwater/Illicit%20Discharge%20Detection%20and%20Elimination%20Program.pdf

Inventory and Ranking of Outfalls/Interconnections:

https://www.wiltonnh.gov/UserFiles/Servers/Server_13599840/File/Government/MS4%20Stormwater/Wilton%20Outfall%20and%20Interconnection%20Ranking%20%20-%20Asset%20Management%20Worksheet.xlsx

MCM #6 Operation and Maintenance Program Procedure:

https://www.wiltonnh.gov/UserFiles/Servers/Server_13599840/File/Government/MS4%20Stormwater/Municipal%20O&M%20Programs.pdf

MCM #6: Winter Road Maintenance Procedure

https://www.wiltonnh.gov/UserFiles/Servers/Server_13599840/File/Government/MS4%20Stormwater/Municipal%20O&M%20Programs.pdf

(Currently, see SOP B.25 Snow Disposal; SOP B.26 Deicing Material Storage; SOP B.27 Deicing Material Application; Wilton will update and digitize/codify legacy handwritten procedures in 2022.

Dry Weather Screening Data:

[https://www.wiltonnh.gov/government/stormwater management/water quality data in wilt on](https://www.wiltonnh.gov/government/stormwater%20management/water%20quality%20data%20in%20wilton) (data)

[https://www.wiltonnh.gov/government/stormwater management/water sampling reports](https://www.wiltonnh.gov/government/stormwater%20management/water%20sampling%20reports) (reports)

Wet Weather Screening Data: N/A

Catchment Investigation Data: N/A

Illicit Discharge Removal Report:

MS4 Incident 21-01

https://www.wiltonnh.gov/UserFiles/Servers/Server_13599840/File/Government/MS4%20Stormwater/MS4%20Incident%2021-01.pdf

MS4 Incident 22-01

https://www.wiltonnh.gov/UserFiles/Servers/Server_13599840/File/Government/MS4%20Stormwater/MS4%20Incident%2022-01.pdf

Salt Reduction Plan: N/A

Nitrogen Source Identification Report: N/A

Phosphorus Source Identification Report: N/A

Chloride Reduction Plan: N/A

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

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

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

Self-Assessment

Select the impairment(s) and/or TMDL(s) that are applicable to your MS4. Make sure you are referring to the 2018 EPA approved Section 303(d) Impaired Waters List which was used for the Year 4 reporting period and can be found here:

<https://www.des.nh.gov/sites/g/files/ehbemt341/files/documents/2020-01/2018-epa-approval-20200225.pdf>.

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

Impairment(s)

☒ Bacteria/Pathogens

☐ Chloride

☐ Nitrogen

☐ Phosphorus

☐ Solids/ Oil/ Grease (Hydrocarbons)/ Metals

TMDL(s)

☒ Bacteria and Pathogens

☐ Chloride

☐ Lake and Pond Phosphorus

Receiving Waters/Impaired Waters/TMDL

Have you made any changes to your lists of receiving waters, outfalls, or impairments since the NOI was submitted?

☒ Yes

Wilton has made changes to the list of receiving waters, outfalls, or impairments since the NOI submission. The following impairments and/or TMDLs have been added or delisted:

Delisted:

NHIMP700060902-12 SOUHEGAN RIVER WILTON (E-coli; 2-M)

NHIMP700060904-08 SOUHEGAN RIVER - PINE VALLEY MILL (E-coli; 2-G)

NHRIV700060904-14 SOUHEGAN RIVER MILFORD, WILTON (E-coli 2-M)

Water Quality Impaired Waters (Added): NHRIV700060906-08 GREAT BROOK (PH; 2-M)

TMDL: E-Coli

☐ No

Wilton has not made changes to the list of receiving waters, outfalls, or impairments since the NOI submission.

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

SWMP – The Town of Wilton hasn't had the capacity to formally update its Storm Water Management Plan fully since 2019 due to personnel turnover, limited staff hours available for program administration needs, and a raw lack of technical knowledge to effectively meet the full requirements of many components. However, as time has gone on, relevant personnel have been keeping abreast of the core requirements, and the town's sophistication/capacity has increased gradually since 2019: Particular components have been updated, and need only be adopted/consolidated into an updated formal SWMP. The town anticipates that recent component updates, and regular future updates to the plan, can be integrated into the town's annual MS4 processes going forward.

IDDE Program Plan – Similar to the SWMP, after the creation/adoption of an initial written document, the town hasn't updated its formal, written IDDE Program Plan despite component updates and the town's increasing level of sophistication regarding various subjects that fall under the plan's purview. Throughout 2021 and Summer 2022 – updated IDDE Program Plan components have been discussed, and it is anticipated a significant rewrite will be needed in 2022 to reflect all the updates that need to be institutionalized by the town.

SSO Inventory: Although the town historically doesn't have any reported SSOs within any applicable periods, it has not maintained a place to create an inventory. It is anticipated a certification of SSO inventory will be integrated into the town's updated IDDE Program Plan.

Inventory and Ranking of Outfalls/Interconnections: The town has produced an initial outfall inventory/ranking based off of information collected in its to-date asset mapping program. A more thorough update in line with field standards is anticipated in the future as more information is collected and the town gains more access to appropriate expertise.

MCM #6: Winter Road Maintenance Procedure: Wilton has adopted appropriate road maintenance standard operating procedures, but hasn't yet integrated its updated SOPs with other legacy procedures and operational guidelines. It is anticipated that integration and formal adoption of a more unified Winter Road Maintenance Procedure will take place in 2022-2023.

Dry & Wet Weather Screening Data: The town has adopted various screening procedures that could be considered industry standard, and an intern program has even executed screening operations in 2021 and 2022 that have elicited useful data. However, procedure components aren't completely integrated together, and the town lacks a unified scheme at this time to fully meet its eventual obligations. Current data and reports produced relevant to screen is published through the above links, but it is anticipated a completely integrated screening program needs to be implemented to meet obligations and make reporting easier.

Illicit Discharge Removal Report: The town considers two events detected November 2021 and February 2022 as relevant to its reporting obligations. The Town had not adopted its IDDE Ordinance, but recorded its reporting and response efforts in the linked reports.

Catchment Investigation Data: The Town has completed a fairly thorough asset mapping effort in 2022, but catchments haven't been delineated by anyone with appropriate expertise.

Minimum Control Measures

MCM 1: Public Education

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

BMP: Grass and Fertilizer

Outreach Resources:

Green Grass & Clear Water Brochure: https://www4.des.state.nh.us/nh-ms4/?page_id=54.

Green Grass Toolbox Page w/ Wilton Flyer source: <https://seagrant.unh.edu/our-work/water-quality/water-quality-lawn-care-outreach-materials>

Description:

The Town of Wilton distributed Green Grass & Clear Water flyers made possible through the NH Sea Grant at the Town Clerk's Office in June 2022. Town Clerk Staff and personnel at the Wilton Recycling are also trained to direct visitors towards the tenets of the Green Grass and Clear Water Program when related topics come up. We also updated the Town's Green Grass & Clear Water program webpage on www.wiltonnh.gov in late May 2022 after the departure of the previous Stormwater manager.

Targeted Audience:

Residential and/or Business and Institutions

Responsible Department/ Parties:

Land Use Office; Administration

Measurable Goal(s):

Lawn care enthusiast residents 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 is the number of flyers that were distributed *during this reporting period*:

Year 4 = 30 copies in June 2022

Municipal program/campaign webpage updated in May 2022:
https://www.wiltonnh.gov/government/stormwater_management/green_grass_clear_water

Goal was achieved.

BMP: Pet Waste Disposal

Outreach Resources:

- <https://www.des.nh.gov/sites/g/files/ehbemt341/files/documents/202203-greenworks.pdf> - Article used by the town as a flyer

[Wilton Scoop on the Poop Campaign/Program Page:](https://www.wiltonnh.gov/government/stormwater_management/get_the_scoop_on_poop)

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

Description:

The Town of Wilton has maintained or executed a few outreach efforts in the Year 4 period related to Pet Waste:

-In June 2022, pet waste flyers based on a “Greenworks” article were made available/ distributed at the Town Clerk’s Office. <https://www.des.nh.gov/sites/g/files/ehbemt341/files/documents/202203-greenworks.pdf> were made available through the town clerk’s office.

-In 2015, prior to the installation of pet waste stations, a local volunteer had performed a pet waste survey at a town site (Whiting Park) where numerous pet waste incidents were recorded on a map. In 2021 and 2022, after the installation and advertising of pet waste stations, this same resident performed two additional surveys on different dates at the same location, and found no incidents to map on either date. These details were reported at several public meetings since the Fall 2021 when areas with installed pet waste stations were discussed; the survey was utilized as an advertising/outreach effort to tangibly illustrate the success of the town’s efforts

-The Town’s “Scoop on the Poop” campaign/program page was updated in June 2022

Targeted Audience:

Residents - Pet Owners

Responsible Department/ Parties:

Land Use Office; Administration

Measurable Goal(s):

- Year 4 = 30 flyers distributed in June 2022 at the Town Clerk's Office
- Pet waste Program/campaign website updated In June 2022
- 1200 scoop the poop station bags were restocked between July 2021 and May 2022, (demonstrating that the stations being advertised are getting used)
- Pet waste survey was discussed at a minimum of 3 public meetings (two Select Board meetings and at least one Conservation Commission meeting)

Goal was achieved

BMP: Disposal of Leaf and Grass Clippings

Outreach Resources:

https://www4.des.state.nh.us/nh-ms4/?page_id=54

<https://www4.des.state.nh.us/nh-ms4/wp-content/uploads/2021/09/DESyardwastebrochure-mail-layout.docx> - Mailer Brochure distributed at Town Clerk's Office in September 2022

Description: Wilton staff printed out and distributed a templated yard waste brochure at the Wilton Town Clerk's Office in September 2022. Town office staff and Recycling Center personnel are aware of how to direct appropriate disposal of yard waste within town.

Targeted Audience: Residents

Responsible Department/ Parties:

Administration

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 is the number of #brochure/flyers that were distributed **during this reporting period:**
Year 4 = 0; 30 copies in September 2022

BMP: Septic System Maintenance

Outreach Resources:

https://www4.des.state.nh.us/nh-ms4/?page_id=54

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

<https://www.wiltonnh.gov/cms/One.aspx?portalId=13599924&pageId=15534337> (Wilton Get Pumped Program/Campaign Page)

Description:

Distributed “Get Pumped” brochures at town hall and promoted directing to website to educate 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). Also updated the town’s own campaign/program website in late May 2022.

Targeted Audience:

Septic System Owners

Responsible Department/ Parties:

Administration / Land Use Office

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 is the number of flyers that were distributed *during this reporting period*:

Year 4 = 10

Goal was achieved.

BMP: Construction/Developers Outreach

Outreach Resources:

https://www4.des.state.nh.us/nh-ms4/?page_id=54

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

https://www.wiltonnh.gov/UserFiles/Servers/Server_13599840/File/Government/MS4%20Stormwater/Developer%20Outreach%20Letters%20Mailed%20June%202022.pdf
(Example letters)

Description:

In June 2022, Wilton's Administration Office mailed out developer outreach letters to five area developers known to have operated within the Town's MS4 area previously, or are in the process of developing properties abutting or nearby within the town. The town's land use office and land use boards (particularly the Planning Board) also engaged developers or property owners with relevant business before the town.

Targeted Audience:

Construction/ Developers

Responsible Department/ Parties:

Administration Office

Measurable Goal(s):

Contractors, developers, and municipal or local organizations are made aware of the updates and changes made to the EPA 2022 Construction General Permit including the requirement that those who wish to be considered a qualified person to conduct inspections must meet EPA training standards. Contractors and developers are also made aware of the need for proper erosion control practices during construction work.

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

Year 4 = 5 (June 2022 - Sanken, Chapel, Buchannan; White; Betterbuilt)

The Town's former Stormwater Manager (Land Use Administrator), during her tenure in Year 4

also performed 6 stormwater inspections and conducted or helped conduct 3 stormwater site plan reviews.

Message Date: Ongoing.

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

MCM 1 General: The previous Stormwater Manager left the town in Spring 2022 when some notable outreach campaign efforts usually take place. Succeeding staff tried to maintain continuity of the programs, but large mailer efforts didn't occur this year. Staff updated the campaign/program pages on the town website in late May and June 2022; the town clerk's office was used as a vector to passively distribute flyers, brochures, and other materials related to MS4 programs. Mailers are planned again in Year 5.

BMP: Disposal of Leaf and Grass Clippings – The Town was late and limited on this effort due to not being aware of the yard waste distinction requirements. It was rectified when discovered by distributing flyers in September 2022; the town will also develop a distinct program/campaign page on its main website.

Educational Events: Wilton's former Stormwater Manager and various stormwater volunteers from Wilton or neighboring communities put on a number of special educational events either directly related or adjacent to MS4 topics beginning in April 2022. This effort was facilitated through the town's new "Community Center Program"; which was made possible through a library grant sponsored by the Wilton and Gregg Free and Public Library. Events included putting on presentations regarding installing and maintaining Rain Gardens and Conservation activities related to wildlife dependent on Wilton's water bodies.

MCM 2: Public Participation

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

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

Description: The Town's Stormwater Manager provided a formal update to the Wilton Select Board at a regularly scheduled meeting in April 2022. The overarching theme was essentially a

“State of Wilton Stormwater” discussion. Topics included discussing the state of the town’s Stormwater Program in general terms, and also of particularly important upcoming components, such as the town’s summer intern program review and adoption of an IDDE Ordinance. While a final IDDE ordinance was not adopted in Spring 2022, a public hearing took place, and public participation and comment was invited.

Subsequent public meetings, hearings, and updates on an IDDE ordinance occurred throughout Summer 2022, and have provided opportunity for public comment. The Town Administrator has also periodically given updates on the progress of Stormwater topics.

Documents and records relating to the permit are retained and available for 5 years to the public at the Wilton Town Hall and on the municipal website: **AND** on website:

<https://www.wiltonnh.gov/> ->

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

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:**

Other Public Involvement in 2022 - Summary of details can be found here

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

Storm drain Murals

-As with previous years, area art students participated in a program coordinated between Wilton’s Stormwater Manager and SAU 63 School Facility members to create beautiful storm drain murals meant to raise awareness about MS4 topics

Regular Storm drain stenciling

-The town’s regular program for the stenciling of storm drains in the MS4 area occurred during the summer of 2022; it was enacted by community volunteers

Road Side cleanup of 68 miles of roads

-Area residents, in honor of Earth Day, participated in a massive road side clean up within the MS4 area and elsewhere around town. In a two-week window of time, nearly 800 bags of trash were removed from 68 miles of roads in Wilton. This monumental effort was topped off by the special removal of a large old tire dump nearby one of the town’s notable historic bridges. Participants as young as kindergartners and as old as senior citizens came out during the event.

Town Hall Rain Garden Installation (MS4 Infrastructure)

A rain garden was installed at the Town Hall located at 42 Main Street. This was designed and executed by Storm Water Intern, Patrick Jackson, and a team of volunteers. The effort was publicized online and in local publications to raise awareness about stormwater.

MCM 3: Illicit Discharge Detection and Elimination (IDDE)

Sanitary Sewer Overflows (SSOs)

- ☐ This SSO inventory section is not applicable because we DO NOT have sanitary sewer.
- ☒ SSO inventory was completed in Year 4. This SSO section is NOT applicable because we DID NOT find any new SSOs. The inventory can be found in submission AND/OR found at the following website <https://www.wiltonnh.gov/>
- ☐ Identified and developed an inventory of all known locations where SSOs have discharged to the MS4 in the last four years during the reporting period and can be found in submission AND/OR found at the following website: <https://www.wiltonnh.gov/>

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

Number of SSO's identified **during this reporting period:** 0

Number of SSO's removed **during this reporting period:** 0

MS4 System Mapping

The following elements of the Phase I mapping have been completed:

- X Outfalls and receiving waters (believed to be completed)
- X Open channel conveyances (believed to be completed)
- X Interconnections (believed to be completed)
- Municipally-owned stormwater treatment structures (partially completed)

- Waterbodies identified by name and indication of all use impairments (partially completed)

☐ Initial catchment delineations (not completed)

Provide additional status information regarding your map:

Wilton has **partially** completed the phase 1 mapping elements as identified in the checkbox(s) above. The current state of the partially completed elements and reason for the delay in completion are as follows: While the town believes its identified and mapped the vast majority of known applicable Phase I infrastructure and elements using a digital GIS system, its possible small elements have been missed. Likewise, the data at present doesn't include directly integrated impairment information or possess all known municipal treatment structures associated with particular facilities (a few are too new or missed the field data collection process this year). Lack of expertise to delineate catchments has also stopped that from being completed yet. Otherwise, it is believed the majority of known applicable Phase I mapping details are completed. The Town will advise if there are subsequent additions of previously unknown elements in future reports.

Screening of Outfalls/Interconnections

Dry Weather Screening

☐ No outfalls were inspected for dry weather screening *during this report period*.

☒ Dry weather outfall screening data can be found in submission **AND/OR** found at the following website:

<https://www.wiltonnh.gov/cms/One.aspx?portalId=13599924&pageId=18683755>

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

Number of outfalls screened *during this reporting period*: 4

Percent of total known outfalls screened *to date (Year 1 – Year 4)*: 13%

Wet Weather Screening

☒ No outfalls were inspected for wet weather screening *during this report period*.

☐ Wet weather outfall screening data can be found in submission **AND/OR** found at the following website:

<https://www.wiltonnh.gov/cms/One.aspx?portalId=13599924&pageId=18683755>

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

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

Percent of total known outfalls screened **to date (Year 1 – Year 4)**: 0%

Provide additional information regarding your dry and/or wet weather screening:

This was the first year the town began to rigorously pursue its screening program. Some good data was collected, and various testing procedures were executed in the field: A number of good lessons were learned that will hopefully contribute to successful completion of required screening obligations.

Catchment Investigations

- ☒ No catchment investigations were conducted **during this report period**.
- ☐ Catchment investigation data can be found in submission **AND/OR** found at the following website

Number of catchment investigations **during this reporting period**: 0

Percentage of total catchments investigated **to date (Years 1 - Year 4)**: 0

Provide additional information regarding catchment investigations: Catchment delineations not created yet.

IDDE Progress

- ☒ Identified each outfall and interconnection discharging from MS4, classified into the relevant category, and priority ranked each catchment for investigation and can be found in submission **AND/OR** found at the following website:
[https://www.wiltonnh.gov/UserFiles/Servers/Server_13599840/File/Government/MS4%20Storm water/Wilton%20Outfall%20and%20Interconnection%20Ranking%20%20-%20Asset%20Management%20Worksheet.xlsx](https://www.wiltonnh.gov/UserFiles/Servers/Server_13599840/File/Government/MS4%20Storm%20water/Wilton%20Outfall%20and%20Interconnection%20Ranking%20%20-%20Asset%20Management%20Worksheet.xlsx)
- ☐ Developed written IDDE plan including a procedure for screening and sampling outfalls
- ☐ No illicit discharges were found **during this reporting period**.
- ☒ The illicit discharges removal report can be found in submission **AND/OR** found at the following

website

https://www.wiltonnh.gov/UserFiles/Servers/Server_13599840/File/Government/MS4%20Stormwater/MS4%20Incident%2021-01.pdf

https://www.wiltonnh.gov/UserFiles/Servers/Server_13599840/File/Government/MS4%20Stormwater/MS4%20Incident%2022-01.pdf

The municipality must report on the following metrics:

Number of illicit discharges identified **during this reporting period:** 02

Number of illicit discharges removed **during this reporting period:** 02

Estimated gallons of flow removed **during this reporting period:** 25 gallons/day (MS4 Incident #22-01)

The municipality must report on the following metrics:

Total number of illicit discharges identified since **the effective date of the permit (July 1, 2018):**
2

Total number of illicit discharges removed since **the effective date of the permit (July 1, 2018):**
2

Provide additional information regarding IDDE progress requirements

Employee Training

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

The municipality should choose one of the following statements:

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

In addition, as a routine, IDDE materials and training, including information on how to identify illicit discharges and SSOs are made available to applicable employees in accordance with IDDE plan.

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

The town is currently operating under a legacy IDDE Plan that was initially adopted a number of years ago. Relevant personnel turnover has been almost nearly complete, and various components and procedures have experienced a great deal of growth since the legacy plan was originally adopted.

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*: 3

Number of inspections completed *during this reporting period*: 6

Number of enforcement actions taken *during this reporting period*: 2

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

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

Not applicable. The Planning Board has conducted reviews of adopted Stormwater runoff control policies.

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

As-built Drawings

- ☒ Developed written procedures to require the submission of as-built drawings and ensure the long-term operation and maintenance of completed construction sites and added these procedures to the SWMP

Describe the status of the measures the MS4 has utilized to require the submission of as-built drawings and ensure long term operation and maintenance of completed construction sites:

The municipality should choose one of the following statements:

A program to address post-construction stormwater runoff from all new development and redevelopment projects has been developed and implemented, and includes projects that

disturb a minimum of one acre, or less than one acre if part of a larger common plan. Procedures for new development and re-development have been prepared/adopted. Submission requirements for stormwater management reports and plans are included in local regulations and can be found at:
[https://www.wiltonnh.gov/UserFiles/Servers/Server_13599840/File/Government/MS4%20Stormwater/8.Section%20H%20-%20Stormwater%20Management%20and%20Erosion%20Control%20Regulations%20\(9\).pdf](https://www.wiltonnh.gov/UserFiles/Servers/Server_13599840/File/Government/MS4%20Stormwater/8.Section%20H%20-%20Stormwater%20Management%20and%20Erosion%20Control%20Regulations%20(9).pdf)

The regulations require that all applications shall include a comprehensive Stormwater Management Plan (SMP). The SMP shall include a narrative description and an Existing Conditions Site Plan showing all pre-development impervious surfaces, buildings and structures; surface water bodies and wetlands; drainage patterns, sub-catchment and watershed boundaries; building setbacks and buffers, locations of various hydrologic group soil types, mature vegetation, land topographic contours. Additional submissions include as-built plans and inspection and maintenance plans for all permanent stormwater control measures. As-built drawings are required to be submitted no later than 60 days after completion.

Street Design and Parking Lot Guidelines

Describe the status of the street design and parking lots assessment including any planned or completed changes to local regulations and guidelines:

Wilton has not completed this requirement because it is not due until Year 6.

Green Infrastructure Report

Describe the status of the green infrastructure report including the findings and progress towards making the practice allowable:

Wilton has not completed this requirement because it is not due until Year 6.

Retrofit Properties Inventory

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

Wilton has not completed this requirement because it is not due until Year 6.

MCM 6: Good Housekeeping

Catch Basin Cleaning

- ☒ Properly stored and disposed of catch basin cleanings so they did not discharge to receiving waters
- ☐ The catch basin cleaning optimization plan or schedule was not completed.
- ☐ The catch basin cleaning optimization plan or schedule can be found in submission **AND/OR** found at the following website

Number of catch basins inspected **during this reporting period**: 149 (can only confirmed those cleaned)

Number of catch basins cleaned **during this reporting period**: 149

Total volume or mass of material removed from all catch basins **during this reporting period**: 20 cubic yards Units

Total number of known catch basins within the MS4 system: 526 known (number needs to be confirmed by Public Works Staff)

No catch basin sump was found more than 50% full during two consecutive routine inspections/cleaning events.

Street Sweeping

- ☒ Properly stored and disposed of catch basin cleanings so they did not discharge to receiving waters
- ☐ All curbed roadways were swept at least once within the reporting period
- ☐ The written procedures for sweeping streets and municipal-owned lots were not completed.
- ☒ The written procedures for sweeping streets and municipal-owned lots can be found in submission **AND/OR** found at the following website
https://www.wiltonnh.gov/UserFiles/Servers/Server_13599840/File/Government/MS4%20Stormwat

[er/Municipal%20O&M%20Programs.pdf](#)
https://www.wiltonnh.gov/government/stormwater_management

Number of (lane) miles swept **during this reporting period:** approximately 3 miles

Volume of swept material **during this reporting period:** 32 cubic yards

Operations and Maintenance (O & M) Procedures for Permittee-Owned Properties

- ☒ Developed written operations and maintenance procedures for parks and open space, buildings and facilities, and vehicles and equipment and added these procedures to the SWMP

The following O&M procedures for permittee-owned properties have been completed:

- ☒ Parks and open spaces
- ☒ Buildings and facilities
- ☒ Vehicles and equipment storage facilities

Operations and Maintenance (O & M) Inventory for Permittee-Owned Properties

- ☐ Developed an inventory of all permittee owned facilities in the categories of parks and open space, buildings and facilities, and vehicles and equipment storage facilities and added this inventory to the SWMP

The following permittee-owned properties have been inventoried:

- ☐ Parks and open spaces (incomplete; all not integrated fully into formal SWMP)
- ☐ Buildings and facilities (incomplete; all not integrated fully into formal SWMP)
- ☐ Vehicles and equipment storage facilities(Incomplete; all not integrated fully into formal SWMP)

Winter Road Maintenance

- ☒ Enclosed or covered storage piles of salt or piles containing salt used for deicing or other purposes
- ☐ The written procedures for winter road maintenance including the storage of salt and sand was not

completed.

- ☒ The written procedures for winter road maintenance including the storage of salt and sand can be found in submission **AND/OR** found at the following website
https://www.wiltonnh.gov/UserFiles/Servers/Server_13599840/File/Government/MS4%20Stormwater/Municipal%20O&M%20Programs.pdf
https://www.wiltonnh.gov/government/stormwater_management

Stormwater Pollution Prevention Plan (SWPPP)

- ☐ Developed written SWPPPs, included in the SWMP, for all of the following permittee owned or operated facilities: maintenance garages, public works yards, transfer stations, and other waste handling facilities where pollutants are exposed to stormwater

Number of site inspections completed for *during this reporting period*: 0

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

Describe any corrective actions taken at a facility with a SWPPP: Repaired a salt shed damaged at the Wilton Highway Garage in Winter 2022.

No corrective actions necessary

Required reconstruction of the Highway Garage Salt Shed due to it collapsing in hard weather.

Infrastructure Operations and Maintenance

- ☐ Completed a written program for MS4 infrastructure maintenance to reduce the discharge of pollutants
- ☐ The written program for MS4 infrastructure maintenance to reduce the discharge of pollutants was not completed.
- ☐ The written program for MS4 infrastructure maintenance to reduce the discharge of pollutants can be found in submission **AND/OR** found at the following website

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

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

The town has a number of facility pollution prevention plans created, but staff turnover has limited their integration. The facilities with the most integration currently are the Fire Station and Recycling center. The Highway Garage has significant management procedures, but due to legacy staff these plans and procedures haven't been completely integrated into formal plan as of yet. There are a number of written municipal management plans for certain elements of the town's stormwater infrastructure, including an installed Filteraa tree at the Fire Station and a newly installed rain garden at the town hall.

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:

Chloride Impairment (Appendix H)

- ☒ Permittee does not have a chloride impairment

Nitrogen Impairment (Appendix H)

- ☒ Permittee does not have a nitrogen impairment

Phosphorus Impairment (Appendix H)

- ☒ Permittee does not have a phosphorus impairment

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

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

Chloride TMDL (Appendix F)

☒ Permittee does not have a chloride TMDL

Lake and Pond Phosphorus TMDL (Appendix F)

☒ Permittee does not have a lake and pond phosphorus TMDL

Additional Required Information

Monitoring or Study Results

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

☐ Not applicable

☒ The results from additional reports or studies are in submission **AND/OR** can be found at the following

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

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

Description of Any Changes in Identified BMPs or Measurable Goals

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

COVID-19 Impacts

If any of the above Year 4 requirements could not be completed **during this reporting period** due to the impacts of COVID-19, please identify the requirement(s) that could not be completed, any actions taken to attempt to complete the requirement, and reason the requirement could not be completed below:

While difficult to assess due to the major staff transitions during the applicable period, Wilton undoubtedly had its progress substantially hampered due to the impacts of COVID-19. This appears to be due to two reasons: 1) the added difficulty in communicating and coordinating internally and with contractors on MS4 topics during the period; 2) The fact that the raw labor bandwidth required to perform non-MS4 tasks ate more staff time than could be normally anticipated: This especially matters in a very small government that was essentially relying on the labor of one employee with part-time hours for stormwater. Coupled that with the reduced availability of volunteers and the town probably didn't make as much progress as would've been normally anticipated.

Activities Planned for Next Reporting Period

Wilton will continue to implement activities in accordance with the permit and SWMP. A special focus will be updating or rewriting old documentation and integrating legacy processes with new standards.

Annual Report Submission

Your completed Annual Report and all associated documents must be sent to EPA. It is optional to send your completed Annual Report to NHDES as well.

Your Annual Report can be submitted either by email or mail:

	EPA	NHDES (Optional)
Email (preferably in pdf with all attachments as separate	stormwater.reports@epa.gov	Deborah.Loiselle@des.nh.gov

documents)		
Mail (postage)	Newton Tedder US EPA – 06-4 5 Post Office Square, Suite 100 Boston, MA 02109	Deborah Loiselle Watershed Management Bureau 29 Hazen Drive; PO Box 95 Concord, NH 03302-0095