

Town of Merrimack, NH	Town of Salem, NH
MS4 Audit Report	MS4 Audit Report
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<b>EPA:</b> Samantha Couture, Rachel Olugbemi, Michelle Coombs	<b>EPA:</b> Solanch Pastrana-Del Valle, Rachel Olugbemi
I. Facility Contacts	I. Facility Contacts
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MS4 Audit Attendees	MS4 Audit Attendees
<b>US EPA Region 1:</b> Samantha Couture, Rachel Olugbemi, Michelle Coombs <b>US EPA Contractor:</b> K. Stockton; Michelle Spiezio <b>NHDES:</b> Deb Loiselle <b>Town of Merrimack:</b> D. Tuomala; Kyle Fox; Robert Price; Lori Barrett; John Manuele; Paul Micali	<b>US EPA Region 1:</b> S. Pastrana-Del Valle; R. Olugbemi <b>US EPA Contractor:</b> K. Stockton; T. Fontaine <b>NHDES:</b> Deb Loiselle <b>Town of Salem:</b> R. Sorenson; L. Butler; J. Danis; C. Dillon; J. Brown; J. Vogl; D. Wholley
II. Background Information	II. Background Information
<b>Date(s) of Audit:</b> August 4-7, 2020 <b>Previous Enforcement Action:</b> None	<b>Date(s) of Audit:</b> July 14-17, 2020 <b>Previous Enforcement Action:</b> None
III. Audit Purpose	III. Audit Purpose
Although the findings in this audit report identify areas of potential Permit noncompliance, they do not constitute any formal notice of violation. <a href="#">Appendix A</a> of this report contains the 2017 NH Small MS4 General Permit. <a href="#">Appendix B</a> contains a copy of the Town’s Stormwater Management Program. <a href="#">Appendix C - Exhibit Log</a> contains various documents that were reviewed by the Audit Team. Exhibits are referenced as applicable throughout this audit report.	Although the findings in this audit report identify areas of potential Permit noncompliance, they do not constitute any formal notice of violation. <a href="#">Appendix A</a> of this report contains the 2017 NH Small MS4 General Permit. <a href="#">Appendix B</a> contains the Town’s Stormwater Management Plan (SWMP), sans appendices. <a href="#">Appendix C - Exhibit Log</a> contains various documents that were reviewed by the Audit Team. Exhibits are referenced as applicable throughout this audit report.

V. Audit Observations and Findings	V. Audit Observations and Findings
<p>Based on the conversations held with Town representatives during the audit, as well as review of MS4 program documentation provided by Town representatives, the Audit Team presents the following observations. Findings about how the Town implements the MS4 program relative to the requirements of the Permit are indicated with bold text and are accompanied by relevant Permit citations. As previously stated, although the findings in this audit report identify areas of potential Permit noncompliance, they do not constitute any formal notice of violation.</p>	<p>Based on the conversations held with Town representatives during the audit, as well as on MS4 program documentation provided by Town representatives, the Audit Team presents the following observations. Findings about how the Town implements the MS4 program relative to the requirements of the Permit are indicated with bold text and are accompanied by relevant Permit citations. As previously stated, although the findings in this audit report identify areas of potential Permit noncompliance, they do not constitute any formal notice of violation.</p>
2. Public Education and Outreach (MCM1)	2. Public Education and Outreach (MCM1)
<p><b>Program Effectiveness:</b> Historically, the Town’s methods to track the effectiveness of public education and outreach were limited to word of mouth from residents and tracking the number of printed materials handed out. However, at the time of the audit, the Town was shifting to more digital and social media-based approaches, which allows easier and more efficient tracking (e.g., tracking the number of views of a video). For example, when the Town posts infomercials on the Town Facebook page, they can track the number of views to evaluate if the audience is viewing the infomercial. Town representatives discussed plans to use these metrics to assess and improve the program moving forward.</p>	<p><b>Program Effectiveness:</b> At the time of the audit, the Town was exploring methods to digitize their educational materials to allow easier and more efficient tracking. For example, the Engineering Division routinely prepares and posts news-bulletin style messages to invite the general public to view stormwater related educational messaging throughout the year. The Town also reviews website/Facebook traffic data to evaluate the effectiveness in reaching the target audience.</p>
3. Public Involvement and Participation (MCM2)	3. Public Involvement and Participation (MCM2)
<ul style="list-style-type: none"> <li>• Make SWMP available to the public by posting on Town website</li> </ul>	<ul style="list-style-type: none"> <li>• Make SWMP available to the public by posting on Town website</li> </ul>
<ul style="list-style-type: none"> <li>• Town Council meeting to present the Town's Stormwater Management Program</li> </ul>	<ul style="list-style-type: none"> <li>• Provide annual MS4 Program Overview Presentation to BOS at a noticed public meeting</li> </ul>
<ul style="list-style-type: none"> <li>• EnviroScape Demonstration</li> </ul>	<ul style="list-style-type: none"> <li>• Roadside Clean-up</li> </ul>
<ul style="list-style-type: none"> <li>• Adopt-A-Road Roadside Clean-up</li> </ul>	<ul style="list-style-type: none"> <li>• Household Hazardous Waste Collection Days</li> </ul>
<ul style="list-style-type: none"> <li>• Park and Open Space Clean-ups</li> </ul>	<ul style="list-style-type: none"> <li>• Town Recycling Program</li> </ul>
<ul style="list-style-type: none"> <li>• Touch-A-Truck</li> </ul>	<ul style="list-style-type: none"> <li>• Reporting Hotline</li> </ul>
<ul style="list-style-type: none"> <li>• Reporting Webpage</li> </ul>	<ul style="list-style-type: none"> <li>• Rain Barrel Program</li> </ul>
<p>3.a. At the time of the audit, the Town’s website did not contain the most up-to-date version of the Town’s SWMP.</p>	<p>3.a. The weblinks on the Town’s website for the Town’s Permit Year 1 MS4 Annual Report and MS4 Notice of Intent (NOI) were not functioning properly at the time of the audit.</p>

4. Illicit Discharge Detection and Elimination (IDDE) Program (MCM3)	4. Illicit Discharge Detection and Elimination (IDDE) Program (MCM3)
Sanitary Sewer Overflows (SSOs)	Sanitary Sewer Overflows (SSOs) - inventoried, documented and mapped
System Mapping	MS4 Mapping (GIS Mapping Demonstration)
Dry Weather Outfall and Interconnection Screening and Sampling	Dry Weather Outfall and Interconnection Screening and Sampling - procedures in place, on-going
IDDE Training	IDDE Training for Town Employees - usually happens in spring, delayed due to COVID-19
Outfalls/Interconnection Inventory and Initial Ranking	
Legal Authority	
Catchment Investigations	
Elimination of Illicit Discharges	
4.a. At the time of the audit, the Town did not have adequate legal authority to implement the IDDE program.	4.a. The Town did not have explicit legal authority to prohibit, investigate, and eliminate illicit discharges to the MS4.
4.b. At the time of the audit, the Town did not have all required elements on their GIS storm sewer system map.	
4.c. The Town did not include all outfalls in the outfall/interconnection inventory and initial ranking.	
4.d. At the time of the audit, the Town had not developed catchment investigation procedures.	
4.e. The Town does not provide and maintain records of annual IDDE training for employees involved in the IDDE program.	
5. Construction Site Stormwater Runoff Control (MCM4)	5. Construction Site Stormwater Runoff Control (MCM4)
Site Plan Review	Site Plan Review - Draft SW Regulations
Site Inspections and Enforcement	Active Construction Sites - GIS Mapping and third-party inspections
5.a. The Town does not conduct site inspections based on written procedures and does not always document site inspections.	5.a. The Town has not developed or implemented written procedures for site inspections and enforcement of sediment and erosion control measures.
6. Stormwater Management in New Development and Redevelopment (MCM5)	6. Stormwater Management in New Development and Redevelopment (MCM5)
Ordinance to Control Post Construction Runoff	Draft SW Regulations
Long-Term Operation and Maintenance of Post-Construction BMPs	Long-Term O&M for post-construction stormwater BMPs
6.a. The Town did not have procedures to ensure the adequate long-term operation and maintenance of privately-owned stormwater control measures.	6.a. The Town did not have procedures to ensure the adequate long-term maintenance of stormwater control measures.

7. Good House Keeping and Pollution Prevention for Municipal Operations (MCM6)	7. Good House Keeping and Pollution Prevention for Municipal Operations (MCM6)
Operations and Maintenance (O&M) Programs	O&M Procedures for municipal activities and facilities
Stormwater Pollution Prevention Plan (SWPPP)	Stormwater Pollution Prevention Plans (SWPPPs)
7.a. The Town did not have O&M procedures for all municipal activities.	7.a. The Town did not provide the total volume/mass of street sweeping materials on their most recent Annual Report.
7.b. The Town had not developed SWPPPs for all permittee-owned facilities where pollutants may be exposed to stormwater.	
7.c. Town did not provide good house keeping and stormwater pollution prevention training to all Town employees who work in areas where materials or activities are exposed to stormwater.	7.b. The Town did not provide good housekeeping and stormwater pollution prevention training to all Town employees who work in areas where materials or activities are exposed to stormwater.
7.d. The Town did not conduct quarterly good house keeping and stormwater pollution prevention inspections at any permittee-owned facilities.	7.c. Town did not conduct quarterly good housekeeping and stormwater pollution prevention inspections at any permittee-owned facilities.