

Received 5/8/18



Town of Plaistow, New Hampshire

OFFICE OF THE TOWN MANAGER

Mark A. Pearson J.D

Plaistow Town Hall
145 Main Street
Plaistow, NH 03865

(603) 382-5200 Office
(603) 382-7183 Fax
Email: mpearson@Plaistow.com
Web: www.Plaistow.com

May 1, 2018

Ms. Glenda Velez
US Environmental Protection Agency – Region 1
5 Post Office Square – OEP06-01
Boston, MA 02109-3912

Mr. Jeff Andrews
New Hampshire Department of Environmental Services
Water Division
Wastewater Engineering Bureau
P.O Box 95
Concord, NH 03302

RE: *Submittal of the Town of Plaistow MS4 General Permit Year 15 Annual Report*

Dear Ms. Velez and Mr. Andrews:

Attached please find The Town of Plaistow's Annual Report for Year 15 of the MS4 Stormwater Permit.

As a community, we have worked hard to minimize the impact of stormwater runoff on the environment and are pleased to report on our continuing efforts to enhance water quality. We are committed to our environmental stewardship and have many completed, ongoing, and planned stormwater related activities to report.

Over the last several years, the Town has made many changes to water ordinances and regulations in order to maintain stormwater systems as part of our obligation to eliminate or greatly minimize illicit discharges to the Town's watersheds. The Town is strongly committed to continuing its development and implementation of programs aimed at reducing the discharge of pollutants from the Town's regulated Small MS4s to the maximum extent practicable; with the goals of protecting water quality and satisfying the water quality requirements of the Clean Water Act and New Hampshire water quality standards.

As a community, the Town of Plaistow is acutely aware of the connection between stormwater and groundwater, which is the source of 100% of the Town's drinking water. We have worked

hard over the last year to ensure that the Town of Plaistow's *Annual Report for Year 15* of our MS4 Stormwater Permit conveys the full measure of our commitment to preserving and protecting the environment under the MS4 program. The Town continued work in 2017 and 2018 on a Potable Water Supply Feasibility Study with funding it received from the NHDES. The purpose of this project is to evaluate the feasibility of converting the existing fire suppression system to a combined fire suppression system/potable drinking water distribution system for residential and commercial areas near a former leaking underground storage tank site. These projects highlight the effort the Town is undertaking relative to its on-going commitment to water quality.

The Town also completed a number of stormwater-related activities this year including:

- Numerous meetings with the Selectmen, Planning Board and staff regarding stormwater stewardship and regulatory responsibilities;
- Conducted two Stormwater Task Force meetings in October of 2017 and March of 2018 consisting of members of the Planning Department, Department of Building Safety, the Town Manager, the Highway Department, and an outside stormwater consultant, Normandeau Associates, Inc.;
- Continued long term monitoring of stream water quality at twenty-one (21) surface water quality stations by the Town's Conservation Commission;
- Tested 3 surface water samples for E. coli DNA source as part of the Town's Conservation Commission long term stream water quality monitoring.
- Dry weather screening of stormwater outfalls continued in 2017 with inspection of 18 outfalls on September 28, 2017;
- Town was awarded a **\$19,995.70** grant in 2013 to update the Town's Source Water Protection Plan, to review/update the Aquifer Protection Ordinance, to review existing groundwater protection rules, and to develop a BMP inspection/survey program for Potential Contamination Sources (PCSs) with the updated Source Water Protection Plan being approved by the NHDES Drinking and Groundwater Bureau in January of 2016. This effort is ongoing.
- Continued work from 2014 when the Town was awarded \$120,000 in funding for a Potable Water Supply Feasibility Study project to evaluate the feasibility of converting the existing fire suppression system to a combined fire suppression system/potable drinking water distribution system for residential and commercial area in vicinity of former leaking underground storage tank site. Awarded an additional \$35,000 in 2015 to evaluate fire protection engineering issues related to the conversion of the system to a combined system. In 2016, the Town was awarded \$160,000 from the NHDES to continue with Phase II of the Potable Water Supply Feasibility Study project. Tasks included further evaluation of technical considerations for converting the existing FSS to a combined FSS/potable water supply system including development of a 20-year flow projection and related water system infrastructure, development of a rate model to evaluate potential costs scenarios for the proposed system, and evaluation of startup and operational issues. Four public meetings were held to present water feasibility project and meeting slides were posted to the town website and town Facebook page and broadcast on local cable television. A water user survey was developed and issued to residents to further raise awareness of water quality

issues in Plaistow and the efforts to provide safe drinking water to affected residents, as well as determine public interest in developing a potable drinking water system;

- Town staff have actively been involved with organizations that provide education on storm water and low-impact development issues;
- Cleaned 511 Town-owned catch basins and removed approximately 40 cubic yards of material in November 2017;
- Removed approximately 30 cubic yards of material swept from Town streets in June 2017;
- Town hosted Household Hazardous Waste collection day April 29, 2017 and participated in Household Hazardous Waste Day collection day in Kingston on October 28, 2017;
- Informational brochures were handed out at these Hazardous Waste Days;
- Plaistow Pride Day hosted in April of 2017 to remove litter from roadsides, parks, and public spaces;
- Coordinated stormwater education program conducted by New Hampshire Department of Transportation at the Pollard Elementary School on May 19, 2017;
- Distributed public information on stormwater protection in hard copy, electronically (via the Town's website), and using the Town's cable TV service;
- Town maintains a "Facebook" page that posts general town information; residents can check for any postings regarding MS4 activities;
- A new town website was developed in 2016 and is periodically updated and includes information on MS4 activities and stormwater;
- Town officials have collaborated to better define the ongoing decision-making processes that affect the Town's infrastructure and water quality;
- As part of Arbor Day 2017 event, an American Liberty Elm tree was planted at the Smith Fields at Ingalls Terrace. The Conservation Commission sponsored the 5th grade Arbor Day poster and poetry contests to celebrate Arbor Day in 2017.
- The Conservation Commission hosted a booth at Old Home Day in 2017 featuring information about the Town Forest and water quality/quantity.
- Town Highway Department conducted pre-winter staff meeting - discussed salt usage, storage/handling of salt, any other spills and how to handle. Highway Department staff attended Green SnowPro training in Keene, NH in October of 2017.
- Town maintained dog waste collection stations in 2017 – located at the cemetery, the Town Hall, Ingalls Terrace Park, the Town Forest, and at Old County Road PARC facility.

Should you have any questions regarding this submittal, please call me or Dee Voss, Town Planning Coordinator, at (603) 382-5200.

Respectfully Submitted,



Mark A. Pearson J.D.

Town Manager

Cc: Plaistow Board of Selectmen

Municipality/Organization: TOWN OF PLAISTOW, NH

EPA NPDES Permit Number: NHR-041026

Annual Report Number Year 15
& Reporting Period: April 1, 2017 – March 31, 2018

NPDES PII Small MS4 General Permit Annual Report (Due: May 1, 2018)

Part I. General Information

Contact Person: Mark Pearson

Title: Town Manager

Telephone #: (603) 382-5200 ext. 261

Email: mpearson@plaistow.com

Mailing Address: 145 Main Street, Plaistow,
NH 03865

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, 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.

Signature: Mark Pearson

Printed Name: Mark Pearson

Title: Town Manager

Date: May 1, 2018

Annual Report Contents:

1. Self-assessment review of compliance with the permit conditions. **See Part II.**
2. An assessment of the appropriateness of the selected BMPs. **Several modifications to BMPs were made; see Part III.**
3. An assessment of the progress towards achieving the measurable goals. **See Part III.**
4. A summary of results of any information that has been collected and analyzed. **See Part IV.**
5. A discussion of activities for the next reporting cycle. **See Part III.**
6. A discussion of any changes in identified BMPs or measurable goals. **See Part III.**
7. Reference any reliance on another entity for achieving any measurable goals. **See Part III.**

Part II. Self-Assessment

The Town of Plaistow has completed the required self-assessment and has determined that our municipality is in compliance with all permit conditions, except the following provisions:

Part I.B.2(e). The US Fish and Wildlife Service determination of permit eligibility with regard to the Endangered Species Act is pending.

Part I.B.2(f). The US Fish and Wildlife Service determination of permit eligibility with regard to Essential Fish Habitat is pending.

Part I.B.2(g). The State Historic Preservation Officer determination of permit eligibility with regard to properties listed or eligible to be listed on the National Register of Historic Places is pending.

Part I.C. Determining whether stormwater discharges contribute to a 303(d) listed water body (Kelly Brook) and specifically identified control measures and BMPs to control the discharge of the pollutants of concern (pH, dissolved oxygen, dissolved oxygen saturation, benthic-macroinvertebrate bioassessments [streams]). Many control measures and BMPs have been implemented and this effort is ongoing. **See Part III.** No stormwater samples were collected during 2017 dry weather outfall investigations as all outfalls were observed to be dry at the time of investigation. Surface water samples were collected from 21 surface water sites in 2017, as part of the Plaistow Conservation Commission's annual surface water sampling program. **See bullet "Part I.D.", below.**

Part I.D. Determining whether stormwater discharges to a TMDL water body (Kelly Brook) are likely to contain the pollutant of concern (E. coli) and specifically identified control measures and BMPs to meet waste load allocations or other pollutant reduction criteria. Many control measures and BMPs have been implemented and this effort is ongoing. **See Part III.** 21 surface water samples were collected from Kelly Brook/ Little River and tributaries in 2017 as part of the Plaistow Conservation Commission's annual surface water sampling program. E. coli values on December 5, 2017 ranged from 1-1,414 CTS/100 ml – with two samples having E. coli values above the state surface water quality standard of 406 CTS/100ml (Station "PCC #20", Snow's Brook-Hillside Drive – 1,414 CTS/100 ml; station "PCC #12" Seaver Brook – Main Street – 548 CTS/100 ml).

Part III. See below for provisions of the Stormwater Management Program that remain in-progress.

During Permit Year 15, the Town conducted a number of stormwater-related activities including:

- Numerous meetings with the Selectmen, Planning Board and staff regarding stormwater stewardship and regulatory responsibilities;
- Conducted two Stormwater Task Force meetings in October, 2017 and March, 2018 consisting of members of the Planning Department, Department of Building Safety, the Town Manager, the Highway Department, and an outside stormwater consultant, Normandeau Associates, Inc.;
- Continued long term annual monitoring of stream water quality at twenty-one (21) surface water quality stations by the Plaistow Conservation Commission;
- Tested 3 surface water samples for E. coli DNA source as part of the Town's Conservation Commission long term stream water quality monitoring.
- Dry weather screening of stormwater outfalls continued in 2017 with inspection of 18 outfalls (~20% of total) on September 28, 2017;
- Town was awarded a \$19,995.70 grant in 2013 to update the Town's Source Water Protection Plan, to review/update the Aquifer Protection Ordinance, to review existing groundwater protection rules, and to develop a BMP inspection/survey program for Potential Contamination Sources (PCSs) with the updated Source Water Protection Plan being approved by the NHDES Drinking and Groundwater Bureau in January of 2016. This effort is ongoing.
- Continued work from 2014 when the Town was awarded \$120,000 in funding for a Potable Water Supply Feasibility Study project to evaluate the feasibility of converting the existing fire suppression system to a combined fire suppression system/potable drinking water distribution system for residential and commercial area in vicinity of former leaking underground storage tank site. Awarded an additional \$35,000 in 2015 to evaluate fire protection engineering issues related to the conversion of the system to a combined system. In 2016, the Town was awarded \$160,000 from the NHDES to continue with Phase II of the Potable Water Supply Feasibility Study project. Tasks included further evaluation of technical considerations for converting the existing FSS to a combined FSS/potable water supply system including development of a 20-year flow projection and related water system infrastructure, development of a rate model to evaluate potential costs scenarios for the proposed system, and evaluation of startup and operational issues. Four public meetings were held to present water feasibility project and meeting slides were posted to the town website and town Facebook page and broadcast on local cable television. A water user survey was developed and issued to residents to further raise awareness of water quality issues in Plaistow and the efforts to provide safe drinking water to affected residents, as well as determine public interest in developing a potable drinking water system;
- Town staff have actively been involved with organizations that provide education on stormwater and low-impact development issues;
- Cleaned 511 Town-owned catch basins and removed approximately 40 cubic yards of material in November 2017;
- Removed approximately 30 cubic yards of material swept from Town streets in June 2017;
- Town hosted Household Hazardous Waste collection day April 29, 2017 and participated in Household Hazardous Waste Day collection day in Kingston on October 28, 2017;
- Informational brochures were handed out at these Hazardous Waste Days;
- Plaistow Pride Day hosted in April, 2017 to remove litter from roadsides, parks, and public spaces;

- Coordinated stormwater education program conducted by New Hampshire Department of Transportation at the Pollard Elementary School on May 19, 2017;
- Distributed public information on stormwater protection in hard copy, electronically (via the Town's website), and using the Town's cable TV service;
- Town maintains a "Facebook" page that posts general town information; residents can check for any postings regarding MS4 activities;
- A new town website was developed in 2016 and is periodically updated and includes information on MS4 activities and stormwater;
- Town officials have collaborated to better define the ongoing decision-making processes that affect the Town's infrastructure and water quality;
- As part of Arbor Day 2017 event, an American Liberty Elm tree was planted at the Smith Fields at Ingalls Terrace. The Conservation Commission sponsored the 5th grade Arbor Day poster and poetry contests to celebrate Arbor Day in 2017.
- The Conservation Commission hosted a booth at Old Home Day in 2017 featuring information about the Town Forest and water quality/quantity.
- Town Highway Department conducted pre-winter staff meeting - discussed salt usage, storage/handling of salt, any other spills and how to handle. Highway Department staff attended Green SnowPro training in Keene, NH in October, 2017.
- Town maintained dog waste collection stations in 2017 – located at the cemetery, the Town Hall, Ingalls Terrace Park, the Town Forest, and at Old County Road PARC facility.

Review of 2017 - 2018 MS4 Stormwater Scope of Work – Status to Date

Part III. Summary of Minimum Control Measures

I. Public Education and Outreach

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Through Permit Year 15 (Reliance on non-municipal partners indicated, if any)	Goals for Permit Year 16 and Permit Year 1 of 2017 NH Small MS4 General Permit
I.1	Informational Brochures for yard work activities	Town Manager/Mark Pearson	Develop and print 2,000 brochures and make available for distribution	<ul style="list-style-type: none"> • The brochure on yard waste was published in Year 12 and distributed at events by Conservation Commission (i.e., Old Home Days) and available at Town Hall. • Informational brochures are sent to residents as part of annual dog registration. 	<ul style="list-style-type: none"> • Continue to distribute brochure on yard waste at the Town Hall, the Transfer Station, and during public events (i.e., Old Home Days). • Publish an article in the local Carriage Towne News and the Senior Center Newsletter on green yard maintenance techniques. • Publish an article in the local Carriage Towne News regarding proper techniques for dog waste management. • Create and distribute brochure addressing issues related to dog waste (in context of bacterial listing of waterways). This brochure will be provided to all dog license holders at time of issuance and will be made available on the Town website and on the Cable TV channel. • Add informational brochures on yard waste and fertilizers to the Town website.

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1.2	Informational Brochures for Trash Management and Disposal of Hazardous Waste	Town Manager/Mark Pearson	Develop and print 2,000 brochures and make available for distribution	<ul style="list-style-type: none"> • Flyers and brochure were published and distributed in Year 12 at events by Conservation Commission (i.e., Old Home Days), available at Town Hall, Pollard School and shown on the Town's Cable TV channel and Town Website. • Two Public Service Announcements regarding Plaistow Recycling and JRM (solid waste contractor for Town) Information and Recycling listed on Town's web site. • Included sections in the Town Annual Report for the Trash and Recycling Advisory Committee as well as a listing of the recycling calendar. • Town recycling brochure was updated in 2017 • Hazard Mitigation Plan includes a section on Household Hazardous Waste 	<ul style="list-style-type: none"> • Review other resources for informational brochures including neighboring communities, NHDES, and national outlets. • Update existing brochure for distribution and display on the Cable TV channel. • Include section in Annual Report for Recycle Go-Green Committee. • Brochures for trash management and disposal of hazardous waste to be handed out at the schools.
1.3	Town Stormwater program in Annual Town Report	Town Manager/Mark Pearson	Annually report on stormwater program activities	<ul style="list-style-type: none"> • The Town of Plaistow's 2016 Town Annual Report (Town Annual Report, as distinguished from MS4 Annual Report) included a focus on water issues in the Town Managers and Conservation Commission reports. • The Town of Plaistow's 2017 Annual Report included a dedicated section for the Town's Stormwater Management Task Force 	<ul style="list-style-type: none"> • The Town of Plaistow's 2018 Annual Report will include a dedicated section for the Town's Stormwater Management Task Force.

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1.4	High School Classroom education including teacher education	Town Manager/Mark Pearson	Develop and implement program at Timberlane High School to teach both educators and students about stormwater	<ul style="list-style-type: none"> • Established communication with NH Fish & Game, NH Dept. of Environmental Services Project WET, NH Dept. of Transportation, and Mark Pedersen, Academic Dean of STEM at Timberlane Regional Middle and High School. • Developed list of Stormwater Education Programs offered by various agencies with list of points of contact. 	<ul style="list-style-type: none"> • Conduct classroom sessions at Timberlane High School using the NH Fish and Game Watershed Education Program in June 2018.
1.5	Promote BMPs on local cable TV	Cable Committee	Information on Cable and semiannually thereafter	<ul style="list-style-type: none"> • Two stormwater PSAs are available on Town cable TV (Vimeo). • Presented on the Source Water Protection Grant at the 2015 NH DES watershed conference. This information has been posted on the Town's webpage. • A new town website was developed in 2016 and includes stormwater information including BMPs. 	<ul style="list-style-type: none"> • Post information provided by NHDES Source Water Protection Grant Program on slides to be run on Cable TV. • Expand promotion of BMPs on local cable TV, town website, and Town Facebook page.

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1.6	Hazardous Household Waste Collection	Highway Department/Dan Garlington	Semi-annual notice in paper, cable, website, Facebook page	<ul style="list-style-type: none"> • Participated in bi-annual multi-town household hazardous waste collections in April and October; provided notices in local paper, cable TV and on the Town's website. • Hosted April 2016 and 2017 events. • Participated in October 2016 and 2017 event. 	<ul style="list-style-type: none"> • The Town will again hold a Household Hazardous Waste Collection Day scheduled once annually in Plaistow and will gather data on the quantity and type of waste being dropped off at these events. Surveys will be given to residents and will be summarized in a table. • Town to continue participating in multi-town hazardous waste days. • Promotional materials to be handed out at the schools to promote spring event.

1a. Additions

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Through Permit Year 15 (Reliance on non-municipal partners indicated, if any)	Goals for Permit Year 16 and Permit Year 1 of 2017 NH Small MS4 General Permit
1.7	Middle School stormwater education	Town Manager/Mark Pearson	Develop an education program with Regional Middle School	<ul style="list-style-type: none"> • Contacted Timberlane Regional School District representative to determine interest and schedules regarding stormwater education. • Contacted NHDOT Stormwater Outreach Program and NH F&G regarding schedule for appropriate water resources sections of the Wonders of Wildlife Program (ponds, wetlands). 	<ul style="list-style-type: none"> • Teach NH Fish and Game watershed class.
1.8	Elementary School stormwater education	Town Manager/Mark Pearson	Develop an education program with Elementary School	<ul style="list-style-type: none"> • Coordinated with Pollard Elementary School to have NHDOT conduct outreach to students on the impacts of stormwater on water quality using their “stormwater table” to provide a visual representation of the movement of stormwater across the landscape picking up pollutants (motor oil, fertilizers, pet waste, dirt, road salt, trash, soap) and ultimately ending up in aquatic ecosystems. This occurred on June 9, 2015, June 9, 2016, and May 19, 2018. 	<ul style="list-style-type: none"> • Schedule to have NHDOT teach their stormwater outreach program for May/June 2018. • Reach out to Pollard School to see if they would be interested in having NH F&G Wonders of Wildlife (ponds & wetlands) program for fall 2018
1.9	Dog Waste Signs with Collection Bags	Highway Department/Dan Garlington	Place signs in dog walking areas to promote cleanup of dog waste	<ul style="list-style-type: none"> • In 2015 signs were created and placed in 5 areas to promote removal of dog waste. Signs included plastic bag dispensers. 	<ul style="list-style-type: none"> • Continue to maintain signs, stock waste collection bags.
1.10	Promote BMPs on Town website and Facebook Page	Town Manager/Mark Pearson	Expand promotion of BMPs to Town website and Facebook	<ul style="list-style-type: none"> • Town created a “Facebook” page that posts general town information; residents can check for any postings regarding MS4 activities. The Facebook page was added in 2015 and actively updated. 	<ul style="list-style-type: none"> • Promote BMPs on Town website and town Facebook page. • Continue to post MS4 activities to town website and Facebook page.

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Through Permit Year 15 (Reliance on non-municipal partners indicated, if any)	Goals for Permit Year 16 and Permit Year 1 of 2017 NH Small MS4 General Permit
I.11	Conduct Regional MS4 Roundtable Discussion	Town Manager/Mark Pearson	Participate in regional MS4 roundtable discussion with Plaistow Stormwater Task Force, regional partners, and guest communities	<ul style="list-style-type: none"> • Hosted MS4 roundtable meeting in July 2016. Participants included Plaistow Stormwater Task Force members, stormwater consultants from Normandeau Associates, Inc., a Rockingham Planning Commission planner, and representatives of neighboring MS4 communities including Hampstead, Atkinson, and Kingston, New Hampshire. 	<ul style="list-style-type: none"> • Host a second regional MS4 roundtable discussion in 2018 to discuss new MS4 permit. • Record the meeting and post on town website and Facebook page.

2. Public Involvement and Participation

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Through Permit Year 15 (Reliance on non-municipal partners indicated, if any)	Goals for Permit Year 16 and Permit Year 1 of 2017 NH Small MS4 General Permit
2.1	Storm Drain Stenciling	Highway Department/Dan Garlington	Develop stencil program and stencil catch basins	<ul style="list-style-type: none"> • Prior to 2016, attempts were made to mark a limited number of catch basins with a stencil system purchased by the Town. The paint and stenciling system did not work well. • During 2016, the Town evaluated other stenciling options including circular disks that can be attached to the pavement adjacent to the catch basin. 	<ul style="list-style-type: none"> • Find stenciling system that works. • Stenciling 50% of catch basins in Town, as funding allows. • Stenciling to be a school project. Students to make the stencils using a CNC machine.

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2.2	Conservation Commission promotion of water quality	Conservation Commission/Tim Moore	Solicit public participation by news releases and cable and annually thereafter	<ul style="list-style-type: none"> • Conservation Commission continued promotion of stormwater issues via news release and cable TV announcements. • Conservation Commission coordinated with Normandeau to continue collection of surface water quality samples at 21 surface water sampling stations. • Conservation Commission and Normandeau developing database for surface water quality sampling results. • Drinking water testing program occurred in November 2016. Test kits were provided to residents and samples were submitted to the NHDES analytical laboratory in Concord. • Conservation Commission hosted a booth at 2017 Old Home Day to promote water quality 	<ul style="list-style-type: none"> • Finish development of comprehensive water quality database which includes water quality data from the Conservation Commission as well as the Stormwater Task Force. • Collect annual surface water quality samples at 21 surface water sampling stations. • Coordinate with Hampstead (abutting town) to test surface waters along impaired reaches. • Determine where the greatest impact to Kelly Brook is occurring. • Drinking water testing program planned for 2019 • Conservation Commission will reserve a booth at 2018 Old Home Day to promote water quality

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2.3	Link on website for reporting problems and deficiencies	Town Manager/Mark Pearson	Link on website and update annually	<ul style="list-style-type: none"> Reviewed the process for reporting problems and deficiencies. Link on web site to complaint form. Complaints typically submitted by letter or phone call. It was agreed that the location of the form on the website and the reporting method warranted revision. Online form is not an option at this point. Residents can call Town Code Enforcement Officer or Health Officer. 	<ul style="list-style-type: none"> Review and revise process for submitting requests. The Town's website to be updated /upgraded to have the capability of online form submission. At minimum update printable form with submittal address, fax #, and email address.

2a. Additions

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Through Permit Year 15 (Reliance on non-municipal partners indicated, if any)	Goals for Permit Year 16 and Permit Year 1 of 2017 NH Small MS4 General Permit
2.4	Place roadside signs identifying sub-watersheds in Town	Conservation Commission/Tim Moore	Place signs to note entering watersheds.	<ul style="list-style-type: none"> A GIS map for Kelly Brook, Little River, and Snows Brook was prepared for selecting signage locations. The majority of road signs identifying entrance into these watersheds were installed by Highway Department staff and Conservation Commission personnel. 	<ul style="list-style-type: none"> The Highway Department will install additional watershed signs in the rights-of-way as funding allows.
2.5	Encourage public participation in planting vegetation that would improve	Conservation Commission/Tim Moore	Plant at least 100 (native to NH) trees or shrubs/year	<ul style="list-style-type: none"> Coordinated an Arbor Day event that involved students at the Pollard Elementary School planting 100 red maple seedlings in their green house 	<ul style="list-style-type: none"> Continue coordination with schools to plant trees with students on Arbor Day.

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	stormwater quality			<ul style="list-style-type: none"> • for the students to take home in June 2015 for planting. • Trees planted at Library and town hall in 2016 as part of Arbor Day events. • One American Elm planted in 2017 as part of Arbor Day Event. 	<ul style="list-style-type: none"> • One American Elm is purchased and will be planted as part of Arbor Day 2018 event • Seek donations from hardware stores in Town as well as landscaping companies for trees, soil and tools to plant.
2.6	Town cleanup event	Conservation Commission	Host town cleanup event once annually	<ul style="list-style-type: none"> • In 2015, 2016, and 2017 town hosted a cleanup weekend to remove litter/waste from roadsides throughout town. • Local Boy Scouts participated in clean up and repair event at Town Forest in 2017 	<ul style="list-style-type: none"> • Plaistow Pride Weekend is planned for April 21-22, 2018. This is a town wide effort to clean up litter along town roadways and in neighborhoods.

3. Illicit Discharge Detection and Elimination

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Through Permit Year 15 (Reliance on non-municipal partners indicated, if any)	Goals for Permit Year 16 and Permit Year 1 of 2017 NH Small MS4 General Permit
3.1	Preparation of Master Drainage Plan	Town Manager/Mark Pearson	Delineation of outfalls to receiving waters	<ul style="list-style-type: none"> • Verified and ground-truthed location and condition of 30 stormwater infrastructure facilities during dry weather inspections. 	<ul style="list-style-type: none"> • Continue GPS of stormwater structures including state, town, and private structures and update map as necessary. • Continue preparation of a drainage plan that identifies catch basins, drainage system features, pipes, etc. • Evaluating option of hiring intern to help with this task.
3.2	Storm sewer ordinance	Planning Board/Dec Voss (Planning Coordinator)	Ordinance adopted by Town and reviewed annually	<ul style="list-style-type: none"> • Reviewed stormwater related ordinances including Article XVI Stormwater – Illicit Discharge and Connection, Article XVIA Stormwater – Post Construction, and Article XIXA Stormwater – Operation and Maintenance. 	<ul style="list-style-type: none"> • Review ordinance for potential modification, as needed. • Review existing NH Town storm sewer ordinances and make recommendations for any changes to Town of Plaistow ordinances, as necessary.
3.3	Qualitative observation of discharge at outfalls	Conservation Commission/Tim Moore	Observations of delineated outfalls	<ul style="list-style-type: none"> • Identified a new list of outfalls for dry weather inspection and mapped these locations. • Reviewed list of outfalls and determined if any locations need to be reviewed or updated for qualitative observation. • All known outfalls have been sampled at least once during wet weather sampling criteria and on a continuing as-needed basis during dry weather inspections (if dry weather sampling criteria are met) (see Sections 3.4, 3.5, and 3.6). 	<ul style="list-style-type: none"> • Any newly identified outfalls will be added to the outfall list and evaluated per the qualitative observation requirements.

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Through Permit Year 15 (Reliance on non-municipal partners indicated, if any)	Goals for Permit Year 16 and Permit Year 1 of 2017 NH Small MS4 General Permit
3.4	Dry weather screening of outfalls	Conservation Commission/Tim Moore	Observations of delineated outfalls	<ul style="list-style-type: none"> • All known outfalls have been inspected at least once; samples were collected on an as needed basis per the dry weather sampling criteria (See Section 3.6); • Developed summary table with schedule for conducting next round of inspections; goal of conducting 25% per year; • Dry weather screening occurred at 30 outfalls in 2016 and 18 outfalls in 2017. No flow was observed during inspections; therefore no dry weather samples were collected. 	<ul style="list-style-type: none"> • Conduct dry weather observations at outfall locations listed on inspection summary table for 2018 (~25% of all locations or 18 locations). To occur during the spring/early summer of 2018 following consecutive days of dry weather.
3.5	Develop program for elimination of illicit discharges, if any.	Conservation Commission/Tim Moore	Development of Plan	<ul style="list-style-type: none"> • Program has been developed. 	<ul style="list-style-type: none"> • Review plan and make recommendations to improve program, if needed.
3.6	Implement program for elimination of illicit discharges, if any	Code Enforcement/Mike Dorman	Enforcement Actions taken	<ul style="list-style-type: none"> • Program has been implemented. • Outfall sampling results are used as basis for IDDE inspections • Additional sampling conducted and IDDE investigation conducted in Meadowview Drive neighborhood. No sources were identified. Site continues to be monitored through Dry Weather Inspection program • Code enforcement responded to 4 abutter complaints in 2017 regarding discharges to storm sewers. No illicit discharges were detected. 	<ul style="list-style-type: none"> • Implement revised program, if needed. • Additional IDDE investigations will be conducted on as needed basis based on dry weather screenings and complaints/reports to code enforcement

3a. Additions

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Through Permit Year 15 (Reliance on non-municipal partners indicated, if any)	Goals for Permit Year 16 and Permit Year 1 of 2017 NH Small MS4 General Permit
3.7	DNA testing of E. coli in stormwater and surface waters	Town Manager/Mark Pearson	Submit select surface water and stormwater samples for E. coli DNA testing to identify bacteria sources in stormwater and surface waters	<ul style="list-style-type: none"> • DNA testing was conducted as part of IDDE investigation in Meadowview Drive neighborhood • DNA testing on 3 surface water samples in 2017 as part of Conservation Commission annual water sampling event (see BMP 2.2) 	<ul style="list-style-type: none"> • Any samples collected during dry weather screening of outfalls will be submitted for E. coli DNA testing. • Identify areas of concern in town surface waters from previous surface water sampling and continue to submit samples for E. coli DNA testing during annual surface water sampling events.

4. Construction Site Stormwater Runoff Control

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Through Permit Year 15 (Reliance on non-municipal partners indicated, if any)	Goals for Permit Year 16 and Permit Year 1 of 2017 NH Small MS4 General Permit
4.1	Preparation of Town Ordinance to address BMPs for new construction, SWPPPs, setbacks and disposal of discarded building materials.	Planning Board/Dee Voss (Planning Coordinator)	Adopt Subdivision and Site Review Amendments	<ul style="list-style-type: none"> • Ordinances already established. • Amendments are in review and will be presented to the planning board 	<ul style="list-style-type: none"> • Continue to evaluate ordinance. • Review other NH Town ordinances and make recommendations for modifications, as needed. • Create stormwater infrastructure map. • Develop a form for existing structures for Town ordinances.
4.2	Develop procedures for Site Plan review of Construction Site Runoff Control	Planning Board/Dee Voss (Planning Coordinator)	Adopt Subdivision and Site Review Amendments	<ul style="list-style-type: none"> • Ordinances already established. 	<ul style="list-style-type: none"> • Continue to evaluate procedures. • Review other NH Town procedures and make recommendations for modifications, as needed
4.3	Develop procedures for site inspection, enforcement, and penalties for non-compliance	Code Enforcement/Mike Dorman	Adopt procedures	<ul style="list-style-type: none"> • Ordinances already established 	<ul style="list-style-type: none"> • Continue to evaluate procedures • Review other NH Town procedures and make recommendations for modifications, as needed.

4a. Additions

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Through Permit Year 15 (Reliance on non-municipal partners indicated, if any)	Goals for Permit Year 16 and Permit Year 1 of 2017 NH Small MS4 General Permit
	None				

4b. Deletions

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Through Permit Year 15 (Reliance on non-municipal partners indicated, if any)	Planned Activities Permit Year 15
4.4	Provide link on website for reporting violations BMP 2.3 incorporates reporting violations for construction runoff. therefore, BMP 4.4 will be deleted.	Town Manager/Mark Pearson	Information on website with mailing, phone, and email address to contact	<ul style="list-style-type: none"> Combined with BMP 2.3 	<ul style="list-style-type: none"> Check to see what system is available to report violations to Town.

5. Post-Construction Stormwater Management in New Development and Redevelopment

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Through Permit Year 15 (Reliance on non-municipal partners indicated, if any)	Goals for Permit Year 16 and Permit Year 1 of 2017 NH Small MS4 General Permit
5.1	Preparation of Town ordinance to address structural BMPs for land disturbance	Planning Board/Dee Voss (Planning Coordinator)	Adopt Subdivision and Site Review Amendments	<ul style="list-style-type: none"> • Ordinances were prepared in prior years. 	<ul style="list-style-type: none"> • Evaluate ordinances and modify as needed. • Review other NH Town ordinances and compare with Plaistow.
5.2	Develop procedures for Site Plan review and review of SWPPPs	Planning Board/Dee Voss (Planning Coordinator)	Adopt Subdivision and Site Review Amendments	<ul style="list-style-type: none"> • The Planning Board and staff have evaluated procedures in prior years. • Town awarded a \$19,995.70 grant in 2013 to update the Town's Source Water Protection Plan, to review/update the Aquifer Protection Ordinance, review existing groundwater protection rules, and develop a BMP inspection/survey program for Potential Contamination Sources (PCSs) identified in the Town. • PCS inspections were conducted in 2015 and 2016. • Property owners were provided a summary of inspection results/survey and provided a list of recommendations to address any BMP deficiencies. 	<ul style="list-style-type: none"> • Evaluate procedures and modify as needed. • Review other NH Town procedures and compare with Plaistow. • PCS inspections are expected to continue in 2018.
5.3	Promote open drainage systems and groundwater recharge through infiltration systems	Planning Board/Dee Voss (Planning Coordinator)	Adopt Subdivision and Site Review Amendments	<ul style="list-style-type: none"> • Ordinance was developed in 2004-2005. • Open drainage is promoted in town site plan review process 	<ul style="list-style-type: none"> • Create an LID development/stormwater ordinance to be part of the Town's zoning regulations.

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Through Permit Year 15 (Reliance on non-municipal partners indicated, if any)	Goals for Permit Year 16 and Permit Year 1 of 2017 NH Small MS4 General Permit
5.4	Develop procedures for site inspections, enforcement, fees	Code Enforcement/Mike Dorman	Develop procedures	<ul style="list-style-type: none"> Procedures are established through occupancy permit. Inspection/enforcement occurs with relicensing process (e.g. salvage yards) and renewal of occupancy permit. Evaluated procedures and determined current form that is sent out to businesses regarding post-construction stormwater compliance should be revised (shortened and simplified). 	<ul style="list-style-type: none"> Modify post-construction stormwater compliance form to include sections for maintenance plan and schedule. Compliance form to be submitted annually. Develop a database of businesses to send out the post-construction stormwater compliance form to be more user-friendly. Include post-construction stormwater reporting requirements in site plan procedure Develop an on-line form and submittal process for the Town website.

5a. Additions

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Through Permit Year 15 (Reliance on non-municipal partners indicated, if any)	Goals for Permit Year 16 and Permit Year 1 of 2017 NH Small MS4 General Permit
5.5	Assessment of Impervious Cover	Planning Board/Dee Voss (Planning Coordinator)	Determine % imperviousness throughout Town	<ul style="list-style-type: none"> Reviewed procedures/methods for calculating impervious cover (IC). Reviewed funding possibilities for performing IC evaluation. 	<ul style="list-style-type: none"> Use GIS and GPS ground-truthing to establish impervious area of the individual watersheds within the Town. Review readily available resources for developing IC assessment including NH Granit and Rockingham Planning Commission.

					<ul style="list-style-type: none">• Develop an impervious cover GIS layer.
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6. Pollution Prevention and Good Housekeeping in Municipal Operations

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Through Permit Year 15 (Reliance on non-municipal partners indicated, if any)	Goals for Permit Year 16 and Permit Year 1 of 2017 NH Small MS4 General Permit
6.1	Prepare Operations & Maintenance Plan to reduce pollutants from municipal activities	Highway Department/Dan Garlington	Develop plan	<ul style="list-style-type: none"> • Discussed components required for O&M plan at quarterly meetings. 	<ul style="list-style-type: none"> • Research and review other O&M Plans for other Towns. • Prepare operations and maintenance plan for new town highway garage building to be constructed in 2020.

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Through Permit Year 15 (Reliance on non-municipal partners indicated, if any)	Goals for Permit Year 16 and Permit Year 1 of 2017 NH Small MS4 General Permit
6.2	Implement Employee Training Program	Highway Department/Dan Garlington	Train staff and review annually	<ul style="list-style-type: none"> • Staff has participated in stormwater coalition meetings and other training sessions and meetings with various associations, as time has allowed. • Highway department staff participated in quarterly staff meetings, which include discussion on salt usage, storage/handling of salt, and how to address any spills of other materials. • A pre-winter staff meeting was held in 2016 and 2017. • Training sessions have been held for the Town Selectmen, Planning Board, and Conservation Commission personnel. • Town Highway Department attended winter maintenance workshop in October 2015 located in Plymouth, NH (Planning and Predicting for Winter Maintenance). • Town Highway Department attended Green SnowPro training in Keene, NH in October 2017 	<ul style="list-style-type: none"> • Develop list of additional training opportunities for highway department personnel and other staff. Participate in training opportunities when possible. • Continue participation in stormwater coalition meetings. Town to reach out to representatives from neighboring towns to see if they want to participate. • Develop annual training program for Highway Department staff. • Highway department staff to continue to attend Green SnowPro training courses.

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Through Permit Year 15 (Reliance on non-municipal partners indicated, if any)	Goals for Permit Year 16 and Permit Year 1 of 2017 NH Small MS4 General Permit
6.3	Catch basin and storm system maintenance	Highway Department/Dan Garlington	Clean and inspect catch basins at least once every two years	<ul style="list-style-type: none"> • Cleaned 511 Town catch basins in October 2015, 2016, and 2017. Conducted by the Highway Supervisor and independent contractor. • Removed approximately 30 yards of material in 2015, 40 yards of materials in 2016, and 40 yards of material in 2017, which are stockpiled at the highway depot for future use consistent with NH regulations and guidance. • Samples of street sweeping and catch basin material were laboratory analyzed in May 2016. 	<ul style="list-style-type: none"> • Continue with annual fall catch basin cleanings. • Guidelines on Management of Street Wastes to evaluate reuse/disposal options and requirements are currently being revised.
6.4	Annual sweeping of streets in Town	Highway Department/Dan Garlington	Sweep 100% of streets annually by August 1	<ul style="list-style-type: none"> • Street sweeping is done annually in the spring by an independent contractor hired by the Town. Street sweeping was conducted in June 2015, April 2016, and June 2017. • Approximately 80 yards of material were removed in 2015; 40 yards of material were removed in 2016; and 30 yards of material were removed in 2017, and were stockpiled at the highway depot for future use consistent with NH regulations and guidance. • Samples of street sweeping and catch basin material were laboratory analyzed in May 2016. 	<ul style="list-style-type: none"> • Street sweeping anticipated to be done in June 2018. • Guidelines on Management of Street Wastes to evaluate reuse/disposal options and requirements are currently being revised.

6a. Additions

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Through Permit Year 15 (Reliance on non-municipal partners indicated, if any)	Goals for Permit Year 16 and Permit Year 1 of 2017 NH Small MS4 General Permit
	None				

7. BMPs for Meeting Total Maximum Daily Load (TMDL) Waste Load Allocations (WLA) <<if applicable>>

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Through Permit Year 15	Goals for Permit Year 16 and Permit Year 1 of 2017 NH Small MS4 General Permit
	None				

7a. Additions

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Through Permit Year 15	Goals for Permit Year 16 and Permit Year 1 of 2017 NH Small MS4 General Permit
	None				

7b. WLA Assessment

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Through Permit Year 15	Goals for Permit Year 16 and Permit Year 1 of 2017 NH Small MS4 General Permit
	None				

Part IV. Summary of Information Collected and Analyzed

The Town of Plaistow has contracted with Normandeau Associates, Inc. to conduct annual surface water sampling at twenty one (21) locations on the impaired reach of Kelly Brook/ Little River and tributaries. Each of the sampling locations has been previously sampled and determined to contain bacterial concentrations in excess of State standards for surface water. However, exceedances of E. coli, for which there is a TMDL in Kelly Brook, are infrequent and spatially limited based on annual sampling. Samples from 21 surface water sites were collected from Kelly Brook/Little River and tributaries on December 5, 2017 with E. coli values that ranged from 1-1,414 CTS/100 ml – with two samples having E. coli values above the state surface water quality standard of 406 CTS/100ml (Station “PCC #20”, Snow’s Brook-Hillside Drive – 1,414 CTS/100 ml; station “PCC #12” Seaver Brook – Main Street – 548 CTS/100 ml). DNA testing of E. coli at three of the 21 surface water sample locations showed one detection of dog DNA and no detections of human, equine, or ruminant DNA. Each of the surface water sampling locations will continue to be sampled annually. Additional E. coli DNA testing will be conducted in future surface sampling events to identify the sources of E. coli contamination. Sampling will be conducted to assess the efficacy of best management practices being implemented within the stream watersheds.