

New Hampshire Small MS4 General Permit Annual Report

Derry

Permit Year 1

EPA NPDES Permit Number NHR041005

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 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:

David Caron

Title:

Town Administrator

Signature:



Date:

Da

9/30/17

Contact Information

Primary MS4 Program Manager Contact Information:

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Small MS4 Authorization

The following annual report is intended to document on the activities undertaken over the reporting period from May 1, 2018 – June 30, 2019 in accordance with the Notice of Intent. NOI can be found at the following (document name or web address):

<https://www.derrynh.org/environmental/pages/derry-municipal-separate-storm-sewer-system-general-permit-ms4gp>

Compliance activities have been identified and described in the Derry Stormwater Management Plan (SWMP) and Illicit Discharge Detection and Elimination Plan (IDDE). Those documents can be found at the following website and will be referred to throughout this report:

SWMP: <https://www.derrynh.org/environmental/pages/derry-municipal-separate-storm-sewer-system-general-permit-ms4gp>

IDDE: <https://www.derrynh.org/environmental/pages/derry-municipal-separate-storm-sewer-system-general-permit-ms4gp>

MCM1 - Public Education and Outreach

Year 1 Activities

BMP: Petwaste Disposal

Document Name and/or Web Address:

"Pet Waste Cleanup Signs"

Description:

Post permanent signs at locations where pet waste has previously been an issue. The signs state pet waste must be picked up per ordinance requirements.

Targeted Audience:

Residents and visiting workforce - Pet Owners

Measurable Goal(s):

Dog owners and/or dog walkers become aware of the ordinance and do not leave pet waste in problem areas.

Since posting of the signs, the volume of pet waste picked up by town employees has decreased significantly. Further assessment of goals will be discussed in greater detail in year 2

Message Date:

- Continuous – Signs posted around the Derry Municipal Center and at Hood Park.

BMP: Petwaste Disposal

Document Name and/or Web Address:

"Pet Waste and Water Quality: It's not just on your lawn, It's in your water!" Flyer

<https://www.derrynh.org/sites/derrynh/files/uploads/petwastesummaryflyer.pdf>

Description:

Distribution "Pet Waste and Water Quality" flyer with proper pet waste management, impacts of improper management, and disposal requirements messaging. Provides frank discussion of the Scoop on Poop, Fecal Facts & Figures, and what citizens can do including spreading the word.

Targeted Audience:

Residents - Pet Owners

Measurable Goal(s):

Dog owners and/or dog walkers are aware of the potential water quality impacts from pet waste, local pet waste ordinances, and how to dispose of pet waste properly.

Several comments on a community run Facebook page reference the Town's flyer distributed at the Town's Household Hazardous Waste collection event.

Assessment of goals will be discussed in greater detail in year 2

Message Date:

- May 11, 2019 – Derry Household Hazardous Waste Collection Event – Distributed 340 flyers to participants
- June 22, 2019 – Beaver Lake Improvement Association Summer Meeting – Derry Environmental Coordinator volunteered the morning to give an environmental presentation to the BLIA membership and distributed 50 additional flyers to the membership.
- April through June (continuous) – Placed flyers in kiosks at the Derry Municipal Center and The Derry Parks and Recreation Department.
- Continuous - Flyer posted on website (see link above)
- June 14, 2019 - Flyer posted to *Bringing Derry Together (est 2013)* Facebook page in response to public inquiries regarding a post about improper disposal in a storm drain.

BMP: Septic System Maintenance for Homeowners**Document Name and/or Web Address:**

Do Your Part-Be SepticSmart-A simple guide to the proper care and maintenance of your septic system (EPA-832-B-12-003 September 2012)

https://www.derrynh.org/sites/derrynh/files/uploads/septicSMART_short_rack_brochure_030915-edited.pdf

Description:

A 4-fold brochure template prepared by USEPA for homeowners on the importance of maintaining their septic system. Brochures are edited with links for additional information. Distribution was through Town kiosks (Derry Municipal Center, Parks and Recreation), and electronic version posted on the Town website. Goal is to advertise during next reporting period for the Annual SepticSmart Week in September 2019.

Targeted Audience:

Residents (Homeowners with Septic Systems)

Measurable Goal(s):

Number of brochures taken from kiosk and website hits (if possible).

Message Date:

- Continuous .

BMP: Proper Fertilizer Use and Yard Waste Management**Document Name and/or Web Address:**

Green Grass & Clear Water Brochure:

https://www.derrynh.org/sites/derrynh/files/uploads/green_grass_and_clear_water_flyer_2019.pdf

Description:

Distribution and promotion of four- fold flyer produced by UNH Cooperative Extension and NH Sea Grant outlining simple recommendations to keep lawns healthy while reducing water quality impacts - including proper fertilizer techniques and disposal of grass clippings.

Targeted Audience:

Residential &/or Business and Institutions

Measurable Goal(s):

Lawn care enthusiasts' 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 materials distribution methods and numbers and change in visits to municipal stormwater webpage.

Message Date:

- May 11, 2019 – Derry Household Hazardous Waste Collection Event – Distributed 320 flyers to participants
- June 22, 2019 – Beaver Lake Improvement Association Summer Meeting – Derry Environmental Coordinator volunteered the morning to give an environmental presentation to the BLIA membership and distributed 50 additional flyers to the membership.
- April through June (continuous) – Placed flyers in kiosks at the Derry Municipal Center and The Derry Parks and Recreation Department.
- Continuous - Brochure posted on website (see link above)

BMP: Sanitary Sewer Overflow and Backup Prevention**Document Name and/or Web Address:**

“What’s Flushable?” Brochure

https://www.derrynh.org/sites/derrynh/files/uploads/septicsmart_short_rack_brochure_030915-edited.pdf

Description:

Distribute and promote brochure prepared by NHDES educating the public on what us and what should not be flushed down the drain, how these impact sewer systems and septic systems and can cause backups leading to water quality issues. The Town has previously included these in bill mailers to residents on municipal sewer.

Targeted Audience:

All Residents (Homeowners with Septic Systems and anyone connected to municipal sewer.

Measurable Goal(s):

Residents are aware of how to prevent sewer backups that can lead to sewage overflows and water quality impacts. Residents also become aware of what can negatively affect the lifecycle of their septic systems.

Assessment of goals will be discussed in greater detail in year 2

Message Date:

- Continuous throughout reporting period – Placed flyers in kiosks at the Derry Municipal Center and The Derry Parks and Recreation Department
- June 22, 2019 – Beaver Lake Improvement Association Summer Meeting – Derry Environmental Coordinator volunteered the morning to give an environmental presentation to the BLIA membership and distributed 100 additional flyers to the membership.
- Continuous - Flyer posted on website (see link above)

BMP: Sanitary Sewer Overflow and Backup Prevention

Document Name and/or Web Address:

“Derry Guide to Sump Pump Connections” Brochure

https://www.derrynh.org/sites/derrynh/files/uploads/sump_pump_connection_brochure_2011.pdf

Description:

Distribute and promote brochure prepared by the Town of Derry educating the public on the proper and legal method of installing sump pumps in order to prevent overloading of the municipal sewer that can lead to overflows or backups.

Targeted Audience:

Resident homeowners that may have sump pumps and are connected to municipal sewer

Measurable Goal(s):

Residents are aware of the regulations regarding sump pump connections, and the risk from illegally connecting to municipal sewer. Residents also become aware of how and where discharge from sump pumps is allowed or restricted.

Assessment of goals will be discussed in greater detail in year 2

Message Date:

- Continuous throughout reporting period – Placed flyers in kiosks at the Derry Municipal Center and The Derry Parks and Recreation Department
- June 22, 2019 – Beaver Lake Improvement Association Summer Meeting – Derry Environmental Coordinator volunteered the morning to give an environmental presentation to the BLIA membership and distributed 100 additional flyers to the membership.
- Continuous - Flyer posted on website (see link above)

BMP: Stormwater Pollution

Document Name and/or Web Address:

"After the Storm: A Citizen's Guide to Understanding Stormwater"

https://www.derrynh.org/sites/derrynh/files/uploads/cu_after_the_storm_rev_0.pdf

Description:

Distribution of editable USEPA guide explaining stormwater runoff, why it is a problem, the effects of polluted runoff, and general overview of stormwater pollution solutions for residential, commercial, agricultural, construction, and automotive facility sites.

Targeted Audience:

Residents, Commercial, and Developers

Measurable Goal(s):

Number of brochures taken from kiosks, and website hits.

Assessment of goals will be discussed in greater detail in year 2

Message Date:

- Continuous – Placed flyers in kiosks at the Derry Municipal Center and The Derry Parks and Recreation Department for last several years.
 - June 22, 2019 – Beaver Lake Improvement Association Summer Meeting – Derry Environmental Coordinator volunteered the morning to give an environmental presentation to the BLIA membership and distributed 100 flyers to the membership.
 - Flyer posted on website (see link above)
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MCM2 - Public Involvement and Participation

BMP: Catch Basin Stenciling

Description:

The Town has made stencils and marking paint available to residents or community groups such as watershed organizations, cub scouts, and other community organizations and groups to mark catch basins with “no dumping” message. In 2019, the Town also purchased several hundred catchbasin markers that fasten directly to the storm grate for use where painting is not feasible.

Participating Party:

Residents - Beaver Lake Improvement Association or other community groups

Measurable Goal(s):

Number of drains stenciled.

Activity Date:

- Fall 2018 – Members of the Beaver Lake Improvement Association stenciled approximately 59 stormdrains around Beaver Lake with “No Dumping – Drains to Lake” message.

BMP: Shoreline Cleanup

Description:

The Town promotes shoreline cleanup in conjunction with roadside cleanup. The Beaver Lake Improvement Association conducts two shoreline cleanup events each year, spring and fall. The Town provides all the trash bags and coordinates the pickup of trash bags left by participants along the roads.

Participating Party:

Residents - Beaver Lake Improvement Association in cooperation with Public Works/Transfer Station.

Measurable Goal(s):

Number of participants and the volume of trash picked up.

Activity Date:

- April 2018, October 2018, April 2019

BMP: Roadside Cleanup

Description:

The Derry Go Green Committee, which is made up of volunteers, with the assistance of the Town, conservation commission, and parks & Recreation Department, promotes spring and fall roadside cleanups for residents to perform trash pickup in areas of their choosing. The Town provides all the trash bags and coordinates the pickup of trash bags left by participants along the roads.

Participating Party:

Residents – in coordination with Public Works/Transfer Station

Measurable Goal(s):

Number of participants and the volume of trash picked up. The Town is working on metrics.

Activity Dates:

- April 2019 – Coincides with the weeks surrounding Earth Day
- October 2018 and 2019

Deliverables will progress in accordance with the accepted NOI and is scheduled for year 2.

BMP: Household Hazardous Waste Collection Events**Description:**

The Town sponsors and holds a household hazardous waste collection event each year in May. The event is open to residents of Derry and Londonderry. The Town of Londonderry reciprocates and sponsors and holds an event each year in November which is open to residents of Derry and Londonderry. These events are held at no charge to residents.

Participating Party:

Residents – Derry and Londonderry, Sponsored by the Town of Derry.

Measurable Goal(s):

Number of participants and the quantity of HHW received.

- May 2018 – 295 households represented (246 Derry, 48 Londonderry, and 1 other town) and 19,830 lbs of HHW collected
- May 2019 – 340 Households represented (273 Derry, 67 Londonderry) and 39,047 lbs of HHW collected

Activity Date:

- May 19, 2018
- November 17, 2018 (sponsored by and held in Londonderry)
- May 11, 2019

BMP: Petwaste Cleanup Signs**Description:**

An apartment management company at an 849-unit apartment complex development consisting of 31 buildings posted their own signs informing residents to clean up after their dogs in order to protect health and water quality. The signs include poop bags and barrels informing residents.

Targeted Audience:

Residents - Pet Owners

Measurable Goal(s):

The effort voluntarily made by the apartment management company to post the signs and provide bags and barrels.

Decrease in dog waste not cleaned up and the number of bags left on the ground (realized by the apartment management company).

Lack of bacteria problems in local watershed catchment.

Message Date:

- Continuous

BMP: Employee Volunteers – Touch-a-Truck**Description:**

The Town advocates and supports employees who volunteer for events. At the Touch-A-Truck event, the Department of Public Works Highway Division displayed several winter maintenance vehicles and equipment and set up a display on salt reduction. Employees and the Superintendent of Operations volunteered their time to be present and answer questions and distribute outreach material promotes shoreline cleanup in conjunction with roadside cleanup. The Beaver Lake Improvement Association conducts two shoreline cleanup events each year, spring and fall. The Town provides all the trash bags and coordinates the pickup of trash bags left by participants along the roads.

Participating Party:

Public Works Employees

Targeted Audience:

Residents (children and adults)

Measurable Goal(s):

Number of employees volunteered: 6

Outreach materials taken by kids:

- Recycling Word Search Puzzle (search for words of recyclable materials) – 27
- Stormwater Stickers sheets (Fun pictures and logos to promote clean water)– 79
- Stormwater Runoff Challenge Crossword Puzzle (educational stormwater pollution prevention topics) – 24
- The Story of Drinking Water comic book (Educational book on where drinking water comes from) - 32

Activity Date:

June 1, 2019

MCM3 – Illicit Discharge Detection and Elimination

BMP: Legal Authority

Derry Stormwater Ordinance: Chapter 131 Stormwater Management <https://ecode360.com/13121730>

BMP: Sanitary Sewer Overflow (SSO) Inventory

During the reporting period, the municipality has developed the SSO inventory in accordance with permit conditions. The inventory identified SSOs during the reporting period and the 5-year period prior to the effective date of the permit. A table summary of all SSOs are included in Table B-2 of the Derry IDDE and is attached to this report. **None of the reported SSOs entered the MS4 system nor entered surface water.** All were promptly mitigated.

Number of SSOs identified in the MS4 system and removed during this reporting period.

Number of SSOs identified: 0

Number of SSOs removed: 0

Number of SSOs identified in Town during the reporting period that did not enter the MS4 system.

Number of SSOs identified not entering MS4 system: 1

Number of SSOs removed not entering MS4 system: 1

Number of SSOs identified in Town in the 5-year period prior to the effective date of the permit and reported during the reporting period that did not enter the MS4 system.

Number of SSOs identified in the 5-years prior to permit effective date: 2

Number of SSOs removed in the 5-years prior to the permit effective date: 2

BMP: Map of Storm Sewer System

Map of storm sewer system and associated outfalls is in progress in accordance with the accepted NOI. The Town has launched the first phase of mapping by making available an additional stormwater layer to our GIS system consisting primarily of stormwater structures (catchbasins and drop inlets).

The Town reapplied for an Asset Management State Revolving Loan and awaiting acceptance confirmation. The Town already has a sewer and water asset management program upon which this will piggyback. The uploading of limited stormwater structure information to the Town's publicly accessible GIS is the first step toward integration.

BMP: IDDE Program - Development and Implementation

A written IDDE plan has been developed and is available on our website.

https://www.derrynh.org/sites/derrynh/files/pages/idde-plan_2019-derry_0.pdf

Initial outfall identification, characterization and prioritization has been completed and included in the IDDE plan. Written investigation deliverables will progress in accordance with the accepted NOI and is scheduled to be complete by April 1, 2020.

Number and percent of total outfall catchments served by the MS4 evaluated using the catchment

investigation procedure:

Number of dry weather outfall investigations/screenings: 3

Number of wet weather outfall inspections/sampling events: 0

Number of illicit discharges removed: 0

Estimated gallons of flow removed: 0

BMP: Employee Training

The Town continues to provide various training to town field personnel on IDDE, stormwater pollution prevention, sedimentation and erosion control Best Management Practices, Good Housekeeping, and identifying and responding to spills.

Certain training programs (Green SnowPro program, Road Scholar erosion control, etc.) are provided through outside/third parties including UNH Technology Transfer Center. Other training will be provided during in-house training sessions.

Highway crews are provided basic training on illicit discharges as part of routine monthly crew chief meetings. Topics include how to identify and report unusual discharges while performing field work. During the reporting period, staff also attended training on the following:

5/17/19 Where it all begins: Knowing/Protecting your Water Source Soil Erosion by NEWWA

2/6/19 Treatment System Design and Post Construction Performance by UNH-T2

10/11/18 Asset Management Workshop by NHDES

BMP: Illicit Discharges Identified

During the reporting period, the Town responded to three alleged and confirmed illicit discharges to the MS4.

7/11/18 - Citizen complaint against neighbor reporting “dirty water” draining to catchbasin near lake. Investigation identified discharge as uncontaminated groundwater. Property owner had a new private drinking water well installed. The well is artesian (free flowing) and overflow is piped to a catchbasin off the road at the edge of the property. No Further Action. Town of Derry Service Request attached.

4/26/19 Incident #19-001

DPW highway division discovered bagged petwaste at the outlet to a drainpipe entering a stormwater detention pond. Investigation identified bagged petwaste was being placed in upgradient catchbasins next to a condominium development. Town cleaned up the bags and initiated pet waste outreach campaign (distribute flyers at HHW collection event, post flyers at various kiosks, and post flyers on the Town’s website). The problem catchbasins are located off the road in a grass/landscaped area, therefore drain stenciling was not an option. The Town purchased storm drain markers with the message “No Dumping - Drains To Waterways” and affixed the markers to the problem catchbasins. Periodic follow-up inspections are on-going. Incident Report attached.

6/13/19 Incident #19-002

DPW employee observed a catchbasin had collapsed at the Derry Municipal Courthouse owned and managed by the State of NH. The catchbasin had filled with sand, asphalt, and concrete to the level that it blocked the outlet pipe. The courthouse drainage system then drains to the Town's MS4 and discharged debris to a downgradient catchbasin.

The Town immediately barricaded the catchbasin for safety and notified the NH Asset Manager and Administrator of the NH Bureau of Courts. The collapse was due to complete disintegration of the upper concrete structure likely due to excessive winter salt use. The Town met with the facility manager and discussed the MS4 program and how it relates to the Town, recommended BMPs including salt reduction efforts and the Green SnowPro Program, and catchbasin cleaning and maintenance. The Facilities Manager indicated the state has a black pavement policy

The catchbasin was repaired on 6/24/19 but was not cleaned out. The Town contacted the Facilities Manager again on 7/11/19 to request they clean out their catchbasin. On August 2, 2019, a contractor for the Courthouse finally cleaned out their catchbasins. The Town subsequently cleaned its downgradient catchbasin.

Historical observations and pictures taken during winter storms of the courthouse and adjacent streets show the courthouse parking lot completely cleared of snow and black, while the adjacent streets maintained by the Town and an adjacent business that utilized Green SnowPro contractors. The State Bid for Snow Plowing Services (Bid number: BID 2108-19) for the 2018-19 winter season specifically states the Scope of Services is:

To Remove all snow from entrance roadways, parking lots, and other areas of the facilities as listed and specified herein.

And that

Salting and sanding shall occur at any time conditions warrant. The following are examples: freezing rain, black ice, sleet, spring melt off, and snow drift clean-up.

And

The Vendor shall maintain locations with the goal of obtaining bare and dry pavement. Bare pavement should occur as soon as practical after a winter storm.

The requirements specified in the state bid contract work do not include any requirements or recommendations to use a Green SnowPro Contractor, nor even the use of Best Management Practices.

The Town inquired with the NHDES Watershed Bureau as whether the State of NH has any policy regarding requirements for recommendations that NH State Agencies use BMPs regarding stormwater pollution prevention, or more specifically when located within MS4 communities. A verbal response from NHDES was that there is no policy or guidance in place requiring state agencies, other than NHDOT, to implement or follow best management practices as it related to stormwater pollution prevention and operations that could impact it.

MCM4 – Construction Site Stormwater Runoff Control

BMP: Sediment and Erosion Control Ordinance and Regulations

Construction Site Stormwater Runoff Control are regulated by the Town under the following ordinance and regulations. These include erosion and sediment control and waste control at construction sites.

Stormwater Management Ordinance:

<https://ecode360.com/13121730>

Stormwater System Design Regulations:

https://www.derrynh.org/sites/derrynh/files/uploads/derry_nh_storm_water_system_design_regulations_-_final.pdf

Land Development Control Regulations:

https://www.derrynh.org/sites/derrynh/files/uploads/ldcr_02.01.2017.pdf

BMP: Site Plan Review Procedures and Reviews

A written site inspection, checklist, and enforcement program for erosion and sediment control measures were already in place. These are included as links in our SWMP and available at the following link on the TOnw's website.

<https://www.derrynh.org/public-works/pages/forms-applications>

Site plan review procedures and application forms used vary depending on whether it is a change or expansion in use or new development. Procedures and application forms are described in one of more of the following documents at the above web address:

- Change in Use Form
- Change/Expansion of Use
- Excavation Application
- Subdivision-Site Plan Application
- Subdivision and Site Plan Process

Number of site plan reviews completed: 13 site plans were reviewed and approved

(Note: number reported is only the site plan reviews that made it through to approval during the reporting period. This does not include repeated or follow-up reviews, reviews of site plans that never were followed through to approval or are still pending, or reviews that were only a change-of-use,

Number of inspections: 258 site inspections were performed

(note: These are all third-party projects that were inspected by the Town. All Town projects have direct daily oversight by Town engineers.)

Number of enforcement actions: none

BMP: Site Inspections and Enforcement of Sediment and Erosion Control Measures Procedures

Procedures for inspection and enforcement of sediment and erosion control measures are included in the booklet at the link below. The booklet discusses procedures for observing construction of subdivisions and related activities being performed in the Town of Derry. The procedures are based upon the Town of Derry Zoning Ordinance, Subdivision Regulations, Site Plan Regulations, Utility Construction Specifications and other pertinent Town Codes. It outlines the relationship between the Developer, the Developer's Contractor and Engineer and the Town of Derry.

Subdivision & Site Plan Construction Monitoring, Procedures & Checklist – January 2011

https://www.derrynh.org/sites/derrynh/files/uploads/subdivison_and_site_plan_construction_monitoring_procedures_and_checklist_2011.pdf

BMP: Waste Control

Derry's *Stormwater System Design Regulations* include requirements to control wastes, discarded building materials, concrete truck washout, chemicals, litter, and sanitary wastes. These requirements are also included by reference to current recognized best management practices documents and guidelines that require development of SWPPPs that specifically cite these requirements.

Stormwater System Design Regulations:

https://www.derrynh.org/sites/derrynh/files/uploads/derry_nh_storm_water_system_design_regulations_final.pdf

MCM5 – Post Construction Stormwater Management in New Development and Redevelopment

BMP: Require As-Built Plans for On-site Stormwater Control

Requirements for a) submission of as-built drawings including all stormwater control structures and BMPs and b) preparation and submittal of a site-specific stormwater operation and maintenance plan are included in the following regulations:

Land Development Control Regulations:

https://www.derrynh.org/sites/derrynh/files/uploads/ldcr_02.01.2017.pdf

Stormwater System Design Regulations:

https://www.derrynh.org/sites/derrynh/files/uploads/derry_nh_storm_water_system_design_regulations_-_final.pdf

BMP: Street Design and Parking Lot Guidance Report (due in year 4)

Deliverables will progress in accordance with the accepted NOI and is scheduled for year 4.

BMP: Green Infrastructure Report (due in year 4)

Deliverables will progress in accordance with the accepted NOI and is scheduled for year 4.

BMP: List of Municipal Retrofit Opportunities (due in year 4)

Deliverables will progress in accordance with the accepted NOI and is scheduled for year 4.

MCM6 – Good Housekeeping and Pollution Prevention for Permittee Owned Operations

BMP: Infrastructure Operations and Maintenance/Asset Management Program (Due Year 2)

Document Name and/or Web Address: Stormwater Asset Management Program and SOPs

During the reporting period, the Town resubmitted a preapplication for an Asset Management SRF for our stormwater program. The program will piggy-back on the Town's existing Sewer and Water Asset Management Program using Lucity Software program. A stormwater module will be added to allow the Town to schedule and track complaints, inspections, repairs, and replacements and other work tasks, including personnel, equipment and material usage which is essential for our administrators and councilors to assess and trend condition and real cost of Derry's stormwater system infrastructure. Activities and procedures that will be implemented so that the MS4 infrastructure is maintained in a timely manner to reduce the discharge of pollutants from the MS4. Includes development of SOPs for which catchbasin cleaning, street sweeping, and stormwater treatment structure inspections.

BMP: Catch Basin Cleaning Program

A schedule for catch basin cleaning has been previously established with the cleaning 750 catch basins per year. The Town is still reviewing historical data to ensure catch basin are not more than 50% full. The preliminary review identified a few catch basins were over 50% full at time of cleaning. During the reporting period the catchbasin cleaning company used their own forms which omitted key information (depth to outlet pipe). The Town is also still waiting for some of the competed forms to be delivered from the contractor. During the reporting period, the Town developed a formal written SOP and a catchbasin inspection and cleaning form.

Number of catchbasins within MS4 regulated area: estimated 3500 (Number includes state- and privately-owned structures. Actual number will be updated as mapping is completed.)

Number catchbasins inspected in accordance with the SWMP: 750

Number of catchbasins cleaned: 750 in 2018, 750 in 2019, Total this reporting period = 1500.

Volume or mass of material removed: ~ approximately 100 cubic yards/year

BMP: Street sweeping program

A street sweeping program has been established for all streets with curbing and/or catch basins in urban, high traffic, and commercial areas and permittee-owned parking lots. The Town uses a contractor for street sweeping. Since the Town virtually eliminated the use of sand for winter operations, the volume of material swept has significantly decreased.

Approximately 6 miles (12 lane miles) of arterial streets in the Downtown area of Derry are swept twice per week on Sunday nights and Wednesday nights. The roadways include but are not limited to Broadway, Crystal Ave, Birch Street, North Main Street, South Main Street, and Pinkerton Street. This work typically commences in April (weather dependent on snow and ice) and continue through November of each year resulting in up to 70 routine street sweeping events per year for arterial roads.

An additional 40 miles (80 lane miles) of curbed streets within the urban compact and nearby roads with closed drainage systems (curbing and catch basins) are swept each year and as needed due to construction, unusual incidents (debris, accidents).

Transfer Lane (the main road leading to the Derry Transfer Station, Highway Garage, Vehicle Maintenance Facility, and the Wastewater Treatment Facility) is swept every other week (0.8 miles or 1.6 lane miles) from April through November resulting in .

The following numbers are the minimum number of lane miles/area swept during the reporting period and assumes activities in 2018 started in May 2018.

<u>Minimum area of sweeping performed each year per event</u>	<u>Per year</u>	<u>This period</u>
Number of arterial (lane) miles swept twice/week (April – November):	12	24
Number of curbed lane miles swept a minimum of once per year:	40	80
Number of lane miles swept every other week at Transfer Lane:	1.6	3.2
Acres of municipal parking lots swept each year	2.9	5.8
Volume or mass of swept material:	Est ~100 cu.yds	
(Town working on improving record keeping by contractor of swept material)		

BMP: Winter Road Maintenance Program

The Town has already developed Winter Maintenance Snow and Ice Control Policy, Winter Operations Booklet (updated annually), and a Salt Reduction Plan for Beaver Brook (rev 9/01/18). A Salt Reduction Plan was first developed in 2011 and had periodic updates as new equipment and BMPs were acquired or implemented. The Salt Reduction Plan is in the process of being updated due to incorporate additional USEPA requirements.

All employees responsible for snow and ice removal participate in annual Winter Preparedness Training.

Evaluation of at least one salt/chloride alternative - The Town along with USEPA, NHDES, NHDOT, Federal Highway Administration, and University of New Hampshire Technology Transfer Center evaluated alternatives to salt/chloride as part of the I-93 Salt Reduction Workgroup. The consensus of the entire group was that alternatives were either not economically feasible, were highly corrosive to equipment infrastructure and vehicles, or would cause other water quality and stormwater pollution issues. Instead an agreed upon Salt Reduction Plan focusing on Best Management Practices and improved technology and equipment was approved.

BMP: Stormwater Treatment Structures Inspection and Maintenance Procedures

The Town continues to collect information with a goal of inventorying and formally inspecting all municipally owned BMPs. SOPs and inventory are in progress. Any BMPs that are safety or flooding hazards are dealt with as needed.

BMP: SWPPP for Waste Handling Facilities (due year 2)

Derry Stormwater Pollution Prevention Plan – Transfer Station/Recycling Facility & Adjacent Facilities (rev 8/25/17)

Description: A SWPPP was prepared for discharge under the Multi-Sector General Permit for the Transfer Station/Recycling Facility and Wastewater Treatment Facility (WWTF). In 2010,

the SWPPP was expanded to include the following adjacent/nearby facilities: Vehicle Maintenance Facility, Highway Garage, Salt Storage Facility, and Septage Transfer Facility. In 2015, the Town obtained a No Exposure Exclusion for the WWTF but retained the WWTF in the SWPPP as a Town BMP.

Routine inspections are conducted quarterly by the Environmental Coordinator and reported to EPA MSGP program. Starting in 2019, during the period, all quarterly inspections for facilities under the SWPPP that are not specifically MSGP sites are accompanied by the assigned facility manager.

During the reporting period, the Buildings and Ground Division of Public Works was in the process of being relocated to an accessory building at these facilities. The building was renovated, cracks in the floor sealed, and a spill kit and flammable materials cabinet were purchased for the facility as pollution prevention measures. Quarterly inspections will commence with the first quarter under the next reporting period.

BMP: Mandatory Recycling Program

A mandatory recycling program was adopted in 1990.

Document Name: Chapter 128 Solid Waste, Article I Recycling (adopted 3/20/1990)

Web Address: <https://ecode360.com/7623460>

In addition to residents, all town facilities and divisions are required to recycle at the transfer station. The Town transfer Station is regulated under the NPDES Multi-Sector General Permit program and has its own SWPPP. A new source-separated recycling facility was constructed a few years ago.

Duration: Continuous

BMP: Pharmaceutical Take-Back Day

Completed (by year 2) ☒ Annual to Semi-Annual Collection day

Description: The Derry Police Department holds and advertises up to two Pharmaceutical Take-Back Days per year, pending funding from the Department of Justice. A permanent drop off is in the Derry Police Department lobby and is available 24-hours/day.

BMP: Parks and Open Spaces Operations and Maintenance Procedures (due year 2)

During the reporting period, the Town developed SOPs for Landscape Maintenance, Material Storage, and chemical application (Pesticides, Herbicides, and Fertilizers).

Deliverables will progress in accordance with the accepted NOI and is scheduled for year 2.

BMP 6: Buildings and Facilities Operations and Maintenance Procedures (due year 2)

During the reporting period, the Town developed SOPs for Landscape Maintenance, Material Storage, and chemical application (Pesticides, Herbicides, and Fertilizers).

Deliverables will progress in accordance with the accepted NOI and is scheduled for year 2.

BMP 6C Vehicles and Equipment Operations and Maintenance Procedures (due year 2)

Deliverables will progress in accordance with the accepted NOI and is scheduled for year 2.

TMDL's and Water Quality Limited Waters

Bacteria/Pathogens

Outfalls to these receiving waters been ranked as high priority for the IDDE implementation in the initial outfall ranking and BMP outlined in MCM#1 have been implemented in accordance with the SWMP.

Phosphorus

Outfalls to these receiving waters been ranked as high priority for the IDDE implementation in the initial outfall ranking and enhanced BMP's been implemented in accordance with the SWMP.

The Town initiated outreach to residents in the Hood Pond Watershed to gauge interest in forming a local Hood Pond Watershed advisory group and received positive response from a significant abutter. The abutter which is a condominium homeowner's association has agreed to allow their property to be used as a classroom setting for an upcoming training on Landscaping for Water Quality to be hosted by the Town during the next reporting period.

Derry, through its participation in the Lower Merrimack Valley Stormwater Coalition will satisfy the tracking and accounting requirement of the municipally owned structural BMP's listed in Attachment 1 to Appendix H.

Chloride

Outfalls to these receiving waters been ranked as high priority for the IDDE implementation in the initial outfall ranking.

The town prepared the SWMP prior to July 1, 2019. Due to the ongoing comment period and pending approval from EPA to discharge, the SWMP was prepared assuming complete approval of the NOI but remained draft pending conditions imposed by EPA following closure of the comment period. On August 21, 2019, the EPA granted the town authorization to discharge stormwater in accordance with the MS4 Permit. In the Authorization to Discharge EPA denied the Town's proposed Alternative Chloride Reduction Plan and requires the Town comply with Appendix F Part I.1 with regard to Chloride TMDL requirements. EPA declared the remainder of the NOI as complete. The SWMP is currently being updated and a revised Chloride Reduction Plan being prepared.

The Town continues to advertise salt reduction BMPs on its website including public education regarding impacts of salt use and methods to reduce salt use on private property. All employees involved in snow and ice removal are required to be trained in the Green SnowPro Program and calibrate all equipment at the beginning of each winter season.

Activities for the Next Reporting Cycle

The Town will continue to implement activities in accordance with the approved Notice of Intent.