

**New Hampshire Small MS4 General Permit**  
**Annual Report**  
**LONDONDERRY**  
**Permit Year 1**

EPA NPDES Permit Number NHR041016



# 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:

Kevin H. Smith, Town Manager

Signature:



Date:

9 / 26 / 19

## Primary MS4 Program Manager Contact Information:

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## Small MS4 Authorization

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

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

Compliance activities have been identified and described in the Londonderry Stormwater Management Plan (SWMP) and Illicit Discharge Detection and Elimination Plan (IDDE). Those documents are currently under revision by the Department of Public Works and will be available at the Department of Public Works once the revisions have been completed.

SWMP: Revised September 2019

IDDE: Draft September 2019



## **MCM 1 - Public Education and Outreach**

### **Year 1 Activities**

#### **BMP 1A: Pet Waste Disposal (2 flyers)**

**Document Name and/or Web Address:**

"Dog Waste and Surface Water Quality " and "Pet Waste and Water Quality" flyers  
<http://www.londonderrynh.org/engineering-division/pages/storms-stormwater>

**Description:**

Distribution and promotion of " Dog Waste and Surface Water Quality " A bifold brochure stating the problem with dog waste, highlighting the benefit of cleaning up and properly disposing of dog waste, and encouraging dog owners to voluntarily clean up after their dog.

Distribution and promotion of "Pet Waste and Water Quality" flyer with proper pet waste management, impacts of improper management, and disposal requirements messaging.

**Targeted Audience:**

Residents - Pet Owners

**Measurable Goal(s):**

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

**Message Date:** June 2019

#### **BMP 1B: Grass and Fertilizer (2 flyers)**

**Document Name and/or Web Address:**

"Green Grass & Clear Water Brochure" and "Stormwater Pollution Education: Fertilizing the Lawn" flyers:  
<http://www.londonderrynh.org/engineering-division/pages/storms-stormwater>

**Description:**

Distribution and promotion of "Green Grass & Clear Water" 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.

Distribution and promotion of “Stormwater Pollution Education: Fertilizing the Lawn” flyer describes the impacts of fertilizer and impacts of too much fertilizer to downstream water sources.

**Targeted Audience:**

Residential &/or Business and Institutions

**Measurable Goal(s):**

Number of flyers taken: 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.

**Message Date:** June 2019

**BMP 1C: Stormwater -What you can do as a Citizen**

**Document Name and/or Web Address:**

“Stormwater- What you can do as a Citizen”

<http://www.londonderrynh.org/engineering-division/pages/storms-stormwater>

**Description:**

Distribute and promote informational flyer, identifying steps to reduce an individual's impact on stormwater and the environment such as rain gardens, rain barrels, etc.

**Targeted Audience:**

Residents &/or Business and Institutions

**Measurable Goal(s):**

Number of flyers taken. Residents and businesses are aware of steps to reduce stormwater impacts the environment.

**Message Date:** June 2019



## **MCM 2 - Public Participation**

### **BMP 2A: Public Review of Stormwater Management Plan (due in year 2)**

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

### **BMP 2B: Public Participation in Stormwater Management Program**

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

### **BMP 2C: Annual Household Hazardous Waste & Monthly Used Oil Collection Events**

#### **Document Link or Reference:**

<http://www.londonderrynh.org/sites/londonderrynh/files/uploads/hhwspring2019.pdf>

<http://www.londonderrynh.org/sites/londonderrynh/files/uploads/oil19.pdf>

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

#### **Description:**

Hold annual Household Hazardous Waste (HHW) Collection Event in November each year for the residents of Londonderry and Derry. The Town of Derry sponsors a separate event in May each year for residents of both towns. The event allows residents of each town to legally and properly dispose of household hazardous waste from their home. The event is also used to spread outreach materials directly to residents. Outreach brochures promoting health and safety and HHW reduction include:

- Alternative Household Products
- Hazardous Materials in your Home
- Green Painting Techniques

The Town of Londonderry provides monthly used oil collection dates. The dates of the collection are posted on the Department of Public Works & Engineering website.

**Targeted Audience:** Residents



**Measurable Goal(s):**

Conducted Household Hazardous Waste Collection on Nov 17, 2018 and May 11, 2019

Conducted Used Oil Collections on May 5, June 2, August 4, Sept 1, Oct 6, Nov 3, Nov 17, Dec 1, 2018 and March 2, April 6, 2019

**BMP 2D: Partnership with City of Manchester and Manchester Airport**

Partnership with the City of Manchester has begun during report period and is in progress in accordance with the accepted NOI. Partnership with the Manchester Airport has not begun.

**BMP 2E: Partnership – Advocacy Groups**

Partnership has begun during report period and is in progress in accordance with the accepted NOI. The Department is attending monthly meetings with the Solid Waste Committee.

**BMP 2F: Partnership with NHDOT**

Partnership has begun during report period and is in progress in accordance with the accepted NOI. The Department has met with NHDOT on several occasions relative to Exit 4A located within the MS4 area.

**BMP 2G: Cleanups – Roadside/General**

“Beautify Londonderry” roadside cleanup program occurred on May 5-6 and 12-13, 2018 and April 20, 2019 during report period in accordance with the accepted NOI.

**MCM 3 – Illicit Discharge Detection and Elimination****BMP 3A: IDDE Legal Authority**

The municipality has established legal authority that was adopted in September 2019 as outlined in the Draft IDDE plan.



### **BMP 3B: IDDE Program**

A Written Draft IDDE plan has been developed in September 2019.

Initial outfall identification (500 per NOI), characterization and prioritization is being developed and included in the Draft IDDE plan. Written investigation deliverables will progress in accordance with the accepted NOI.

The following tasks are in progress in accordance with the accepted NOI.

Number and percent of total outfall catchments served by the MS4 evaluated using the catchment investigation procedure: 0

Number of dry weather outfall observations for flow only: 485 (OBSERVED DRY)

Number of wet weather outfall inspections/sampling events: 0

Number of illicit discharges removed: Zero found

Estimated gallons of flow removed: Zero

### **BMP 3C: Sanitary Sewer Overflow (SSO) Inventory**

The Town of Londonderry does not have any SSOs

Number of SSO's identified this year: zero

### **BMP 3D: Map of Storm Sewer System**

Map of storm sewer system and associated outfalls is in progress in accordance with the accepted NOI.

### **BMP 3E: Dry Weather Screening/Sampling**

Dry weather screening/sampling of storm sewer system and associated outfalls is in progress in accordance with the accepted NOI.



### **BMP 3F: Catchment Investigation**

Catchment investigation of storm sewer system and associated outfalls is in progress in accordance with the accepted NOI.

### **BMP 3G: Employee Training**

As a routine IDDE, materials and training, including information on how to identify illicit discharges and SSOs will be made available to applicable employees in accordance with IDDE plan.

## **MCM 4 – Construction Site Stormwater Runoff Control**

A Written site inspection and enforcement program for erosion and sediment control measures will be created and is included in our SWMP.

The following tasks are in progress in accordance with the accepted NOI.

Number of site plan reviews completed: 17

Number of inspections: 450

Number of enforcement actions: 0

## **MCM 5 – Post Construction Stormwater Management in New Development and Redevelopment**

### **BMP 5A: As-Built Plans for On-Site Stormwater Control (due in year 2)**

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

### **BMP 5B: List of Municipal Retrofit Opportunities (due in year 4)**

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



**BMP 5C: Green Infrastructure Report (due in year 4)**

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

**BMP 5D: 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 5E: Review Regulations to Ensure any stormwater controls or management practices for new development and redevelopment meet the retention or treatment requirements of the permit (due year 2)

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

**MCM 6 – Good Housekeeping and Pollution Prevention for Permittee Owned Operations**

**BMP 6A: Inventory of all Permittee-Owned Parks and Open Spaces, Buildings and Facilities, and Vehicle and Equipment (due year 2)**

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

**BMP 6B: Parks and Open Spaces Operations and Maintenance Procedures (due year 2)**

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

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

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



#### **BMP 6D: 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.

#### **BMP 6E: Catch Basin Cleaning Program**

A schedule for catch basin cleaning has been established with the goal of ensuring that a catch basin should not be more than 50% full. This is detailed in the SWMP.

The following tasks are in progress in accordance with the accepted NOI.

Number of catch basins within MS4 regulated area: 2,500+/-

Number catch basins inspected in accordance with the SWMP: 2,500+/-

Number of catch basins cleaned: 1750

Volume of material removed: 640 +/- CY

#### **BMP 6F: Street Sweeping Program**

A street sweeping program is to be established such that all streets with curbing and/or catch basins and Town owned parking lots will be swept in accordance with permit conditions. The plan to conduct the street sweeping is currently under development.

The following tasks are in progress in accordance with the accepted NOI.

Number of (lane) miles swept: 0

Volume of swept material: 0

#### **BMP 6G: Stormwater Treatment Structures Inspection and Maintenance Procedures**

Londonderry continues to collect information with a goal of inventorying and formally inspecting all municipally owned BMPs. Any BMPs that are safety or flooding hazards are dealt with as needed.



#### **BMP 6H: Winter Road Maintenance Program**

Written Winter Road Maintenance Procedures have been in place since 2003. A review of the procedures will be conducted in the future and updated as appropriate. The Town continues to implement the Beaver Brook Watershed Salt Reduction Plan. The salt reduction plan data was recently updated on July 26, 2019.

#### **BMP 6I: SWPPP (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 have been ranked as high priority for the IDDE implementation in the initial outfall ranking and enhanced BMP's have been implemented in accordance with the SWMP.

### **Chloride**

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

Londonderry through its participation in the Lower Merrimack Valley Stormwater Coalition and continued involvement with the NHDES led Green Snow Pro Program are working to develop a public education regarding impacts of salt use, methods to reduce salt use on private property, modifications to driving behavior in winter weather in accordance with Appendix F of the NPDES permit.

## **Description of any changes in identified BMPs or measurable goals**

Londonderry made changes as noted below to the following BMPs and/or measurable goals that were outlined in the approved Notice of Intent.

- Londonderry has provided two Public Education and outreach flyers for Pet Waste and Lawn Care under MCM-1 and provided a Flyer relative to Stormwater and citizen participation. The five flyers under MCM 1 are located on the Town's Stormwater webpage as noted under MCM 1 above.
- A Draft SWMP was developed, but was not completed or available during the reporting period. The Draft SWMP did not include an IDDE program due to the legal authority not being completed during the reporting period. Revisions to the SWMP including the format and updates to address and include the Draft IDDE and Stormwater Ordinance are currently ongoing and beyond the end of the reporting period. Once completed, a revised SWMP will be available at the Department of Public Works for public review and comment per the NOI (MCM 2).
- An IDDE program was not completely developed during the current report period due to the legal authority portion of the program not being completed or in place during the current report period. A Draft IDDE plan was under development during the reporting period (MCM 3).



- The Town recently adopted a Stormwater Ordinance on September 16, 2019 to provide legal authority for the Draft IDDE program. The Draft IDDE program will be updated to include the final version of the adopted ordinance (MCM 3).
- Updates to the Town regulations relative to construction stormwater runoff under BMPS 4A-4C were not developed during the reporting period. The Town will be developing programs under the BMPS that will include references for development and construction activities relative to the recently adopted Stormwater Ordinance (MCM 4).
- The Town has conducted catch basin inspection and cleaning, as needed, of all catch basins located in the MS4 area during the reporting period. The Town will develop a program to log the catch basins cleaned and inspected including volume of material removed (BMP 6E).
- A street sweeping program was not developed during the reporting period. The Town historically has not had issues/concerns with sediment and currently does not conduct this specific activity town wide. The Town is currently developing a street sweeping program as noted in the NOI application (BMP 6F).
- The salt reduction plan data of the Town's Beaver Brook Watershed Salt Reduction Plan was recently updated on July 26, 2019 (beyond the reporting period).

### **Activities for the Next Reporting Cycle**

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