



Town of Plaistow, New Hampshire
OFFICE OF THE TOWN MANAGER
Mark A. Pearson J.D

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September 29, 2019

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

Ms. Deborah Loiselle
New Hampshire Department of Environmental Services, Water Division
P.O Box 95
Concord, NH 03302

RE: Submittal of the Annual Report for the Town of Plaistow NH Small MS4 General Permit for the period from May 1, 2018-June 30, 2019

Dear Ms. Warner and Ms. Loiselle:

Attached please find the Town of Plaistow's Annual Report for our USEPA Small MS4 Stormwater Permit for the period from May 1, 2018-June 30, 2019.

We are pleased to report on our continuing efforts to enhance water quality for this period. As a community, we have worked very hard to minimize the impact of stormwater runoff on the environment during this period and to meet all the requirements of the new MS4 permit. We are strongly committed to continuing our development and implementation of programs aimed at improving the Town's stormwater management to protect water quality in accordance with the MS4 permit. Our annual report conveys the full measure of our commitment to preserving and protecting the environment under the MS4 program.

Should you have any questions regarding this submittal, please call me or Dee Voss in our Town Planning Department at (603) 382-5200 Ext 202.

Respectfully submitted

Mark A. Pearson, J.D.
Town Manager

Municipality/Organization: TOWN OF PLAISTOW, NH

EPA NPDES Permit Number: NHR041000

Annual Report Number Year 1
& Reporting Period: May 1, 2018 – June 30, 2019

NPDES PII Small MS4 General Permit Annual Report

1. General Information

Contact Person: Mark Pearson

Title: Town Manager

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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:



Printed Name:

Mark A. Pearson

Title:

Town manager

Date:

September 29, 2019

Annual Report Contents:

1. General Information
2. Summary of MS4 Compliance Activities 2018-2019
3. Summary of Minimum Control Measures
4. Summary of Information Collected and Analyzed

2. Summary of MS4 Compliance Activities 2018-2019.

This section includes a summary of the Town of Plaistow's compliance actions completed in 2018 and 2019 (i.e. during the first year covered under the 2017 MS4 permit) as required in the 2017 MS4 permit. This section fulfills the reporting requirements of permit Parts:

- 4.4.2.1 - Self-assessment review of compliance with the permit conditions.
- 4.4.2.3 – Status of any plans or activities required by Part 2.1 and/or Part 2.2.

The Town of Plaistow has completed the required self-assessment (Part 4.4.2.1) and has determined that the municipality is in compliance with all permit conditions. Plaistow's Stormwater Management Program remains in-progress and includes continuing as well as new stormwater activities during the reporting period. A summary of stormwater related activities during the reporting period follows:

- Submitted Notice of Intent for coverage under the 2017 NH MS4 permit
- Completed a written Stormwater Management Plan (SWMP) document;
- The SWMP was made available to the public and is kept in hard copy and available on request at the Plaistow Town Hall.
- Illicit Discharge Detection and Elimination (IDDE) procedures are being adopted from article XVI "Storm Water – Illicit Discharge and Connection" in the Plaistow Zoning Ordinance into a written IDDE document as required in the 2017 MS4 permit. Outfalls in town were preliminarily ranked for IDDE investigation.
- Construction site runoff control measures including inspecting construction sites for proper sediment controls and conducting site plan reviews are being adopted from Article XVIA "Storm Water – Post Construction" in the Plaistow Zoning Ordinance into a written construction site runoff controls document as required in the 2017 MS4 permit.
- 508 Town-owned catch basins were cleaned in November 2018 and approximately 35 cubic yards of material was removed from the catch basins. Catch basin cleaning is planned for November 2019.
- Removed approximately 35 cubic yards of debris swept from Town streets in June 2019 and approximately 35 yards of debris in June 2018;
- Winter road maintenance procedures including education and staff training, and salt storage best management practices have been reviewed and updated for compliance with 2017 NH MS4 requirements.
- The New Hampshire Department of Environmental Services (NHDES) has recently informed the Town of Plaistow that the Town will be receiving a Clean Water State Revolving Fund (CWSRF) loan of \$30,000 with 100% principal forgiveness in the Fall 2019 to develop a stormwater asset management plan. The Town received authority to apply for and spend a CWSRF loan at its 2019 Town Meeting in March 2019. It is expected that the loan will be received early in the Fall 2019 and that the plan will be developed in 2019-

2020. Asset management plan implementation should assist the town with MS4 permit compliance activities and to improve the Town's stormwater infrastructure over the long term.

- Numerous meetings with the Selectmen, Planning Board and staff regarding stormwater stewardship and regulatory responsibilities;
- Conducted three Stormwater Task Force meetings in September, 2018 and December, 2018, and June, 2019. The Task Force consists of members of the Planning Department, Health 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 on May 28, 2019.
- 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 Water and Groundwater Bureau in January of 2016. This effort is ongoing.
- The Town of Plaistow is in the process of design and construction of a municipal water system using the existing fire suppression system as the core of the new system with interconnection to the City of Manchester through the Hampstead Area Water Company, Salem and Derry system using New Hampshire Drinking Water and Groundwater Trust Funds. ;
- Town staff have actively been involved with organizations that provide education on stormwater and low-impact development issues;
- Town hosted Household Hazardous Waste collection day on April 28, 2018 and April 27, 2019 and participated in Household Hazardous Waste Day collection day in Atkinson on October 13, 2018. The October 2019 event is planned for October 26th in Danville;
- Informational brochures were handed out at these Hazardous Waste Days;
- Plaistow Pride Day was hosted on Saturday April, 27, 2019 to remove litter from roadsides, parks, and public spaces. An event also took place in April 2018;
- Coordinated stormwater education program conducted by New Hampshire Department of Transportation at the Pollard Elementary School on June 11, 2019. In 2018, a stormwater education program was also scheduled for June 4th however it was cancelled due to rain;
- 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 the Arbor Day 2018 event, one American elm was planted. In 2019, another tree was planted at the Smith Fields at Ingalls Terrace.
- On June 22, 2019, the Board of Selectmen booth at Old Home Day provided flyers and handouts promoting stormwater.

- 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.
- Town maintained dog waste collection stations in 2018 and 2019 – located at the cemetery, the Town Hall, Ingalls Terrace Park, the Town Forest, and at Old County Road PARC facility.

Part 4.4.2.3 of the 2017 NH MS4 permit requires this report include the status of any plans or activities required by Part 2.1 and/or Part 2.2 of the permit, including requirements for discharges to meet applicable water quality standards, including discharges to impaired waters. All fresh surface waters in NH are listed as impaired for mercury and are subject to a regional mercury TMDL; however, the mercury source is identified as atmospheric pollution and no special stormwater measures are required for discharges to waters covered by the regional mercury TMDL. Kelly Brook in Plaistow is listed as impaired for E. coli and is subject to the New Hampshire Statewide Bacteria TMDLs. Parts 2.1 and 2.2 of the MS4 permit require that discharges to a waterbody with an approved TMDL for bacteria meet the requirements of Appendix F, Part II. of the 2017 NH MS4 permit. Appendix F, Part II. of the permit specifies enhancement of BMPs required by Part 2.3 of the permit including an annual message encouraging proper management of pet waste and provide information to owners of septic systems about proper maintenance in any catchment that discharges to a water body impaired for bacteria or pathogens. Appendix F, Part II also requires designation of catchments draining to any waterbody impaired for bacteria as either Problem Catchments or HIGH priority in implementation of the IDDE program. Plaistow has a pet waste information program that includes a pet waste brochure available on the Town's website and at the town hall and is provided as part of annual dog licensing through the town clerk. Septic system maintenance information is made available for homeowners as part of Old Home Days. Catchments draining to Kelly Brook are designated as HIGH priority in implementation of the IDDE program.

3. Summary of Minimum Control Measures

This section includes a summary of the Town of Plaistow's minimum control measures (2.3 of the 2017 NH MS4 permit) completed during the first year covered under the 2017 MS4 permit, as well as future planned activities, and any changes to stormwater BMPs as required in the 2017 MS4 permit. This section fulfills the reporting requirements of permit Parts:

- 4.4.2.2 - An assessment of the appropriateness of the selected BMPs.
- 4.4.2.4 - An assessment of the progress towards achieving the measurable goals and objectives of each control measure in Part 2.3.
- 4.4.2.6 - A description of activities for the next reporting cycle.
- 4.4.2.7 - A description of any changes in identified BMPs or measurable goals.
- 4.4.2.8 - A description of activities undertaken by any entity contracted for achieving any measurable goal or implementing any control measure.

1. Public Education and Outreach (Part 2.3.2)

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Through Permit Year1 (Reliance on non-municipal partners indicated, if any)	Goals for Permit Year 2 of 2017 NH Small MS4 General Permit
1.1	Informational Brochures for yard work activities	Town Manager/Mark Pearson	Develop and print 2,000 brochures and make available for distribution	Yard Waste and Fertilizers The brochure on yard waste was published in Year 12 under the previous permit. - Brochure on yard waste and fertilizers was added to the Town website on 7/5/18. Brochures are available in the lobby of the Town Hall on the web page for Groundwater Protection and Best Management Practices, and are +distributed at the Transfer Station and events by the Conservation Commission (i.e., Old Home Day). - Green yard maintenance information has been added to the fall edition of the Quarterly Senior Newsletter. Dog Wastes - A brochure was completed on 4/25/18 that addresses issues related to dog waste. Brochures are located in the Town Clerk's Office and given out during dog registration. Brochures are also available in the Town Hall Lobby, the Town website, and on the web page for Groundwater Protection	Yard Waste and Fertilizers - Continue to distribute brochure on yard waste and fertilizers at the Town Hall, the Transfer Station, and during public events (i.e., Old Home Days). - Hand out on as-needed basis at landfill; also check to see if people are aware of hazardous waste recycling events. - Publish an article in the local Carriage Towne News, and the Cable TV channel. Dog Wastes - Continue to distribute brochure addressing issues related to dog waste (in context of bacterial listing of waterways). - Publish an article in the local Carriage Towne News and the Cable TV channel regarding proper techniques for dog waste management. - Create dog license holder GIS layer to initiate efforts to target literature.

				and Best Management Practices. Dog waste information has been added to the Fall edition of the Quarterly Senior Newsletter.	
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	- Informational brochures are sent to residents as part of annual dog registration. - Fliers 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	- 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. Need to determine who is responsible and what brochures we have.
1.3	Town Stormwater program in Annual Town Report	Town Manager/Mark Pearson	Annually report on stormwater program activities	The Town of Plaistow's 2020 Annual Report will continue to include a dedicated section for the Town's Stormwater Management Task Force.	

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	included a section on water issues from the Town Managers and Conservation Commission reports. - 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.	Conduct classroom sessions at Timberlane High School using the NH Fish and Game Watershed Education Program in June 2020.
1.5	Promote BMPs on local cable TV	Cable Committee	Information on Cable and semiannually thereafter	- 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.	- 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.
1.6	Hazardous Household Waste Collection	Highway Department/Dan Garlington	Semi-annual notice in paper, cable, website, Facebook page	- 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 2018 and 2019 events.	- The Town will again hold a Household Hazardous Waste Collection Day scheduled once annually in 2020 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.

				Participated in October 2016, 2017 and 2018. 2019 event is planned for October 26, 2019 in Danville.. The October 2019 event is planned for October 26th in Danville;	Promotional materials to be handed out at the schools to promote spring event.
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1a. Additions

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Through Permit Year 1 (Reliance on non-municipal partners indicated, if any)	Goals for Permit Year 2 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	• 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).	• Teach NH Fish and Game watershed class.
1.8	Elementary School stormwater education	Town Manager/Mark Pearson	Develop an education program with Elementary School	• 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 11, 2019, an event scheduled for June 4, 2018 was cancelled due to rain.	• Schedule to have NHDOT teach their stormwater outreach program for May/June 2020. • 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 2020.
1.9	Dog Waste Signs with Collection Bags	Highway Department/Dan Garlington	Place signs in dog walking areas to promote cleanup of dog waste	• In 2015 signs were created and placed in 5 areas to promote removal of dog waste. Signs included plastic bag dispensers.	• 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	- 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. - A "BMP of the Month" is displayed on the Town event calendar. This began on 4/23/18.	- Continue to promote BMPs on Town website and town Facebook page. - Continue to post MS4 activities to town website and Facebook page. - Continue to display "BMP of the Month."
1.11	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	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.	- Host a second regional MS4 roundtable discussion in 2020 to discuss new MS4 permit. - Record the meeting and post on town website and Facebook page.
1.12	Update target audiences to include businesses, institutions (private colleges, private schools, hospitals)	Town Manager/Mark Pearson	Develop messages for each audience.	Audience currently includes Town residents and businesses	Distribute two messages to each audience.

2. Public Involvement and Participation					
BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Through Permit Year 1 (Reliance on non-municipal partners indicated, if any)	Goals for Permit Year 2 of 2017 NH Small MS4 General Permit
2.1	Storm Drain Stenciling	Highway Department/Dan Garlington	Develop stencil program and stencil catch basins	- 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.	The stenciling program is still on hold. The Town marks them but just so we know where they are in the snow. Either sample stencil or evaluate “Disks. The ultimate goal is to: - 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.
2.2	Conservation Commission promotion of water quality	Conservation Commission/Tim Moore	Solicit public participation by news releases and cable and annually thereafter	Conservation Commission continued promotion of stormwater issues via news release and cable TV announcements.	Finish development of comprehensive water quality database which includes water quality data from the Conservation Commission as well as the Stormwater Task Force.
				- Conservation Commission coordinated with Normandeau with the collection of surface water quality samples at 21 surface water sampling stations. - Surface water sampling took place on May 28, 2019 at 21 surface water sampling locations. Testing did not occur in 2018	- Coordinate with Hampstead (abutting town) to test surface waters along impaired reaches. - Continue to collect annual surface water quality samples at the 21 identified surface water sampling stations

2. Public Involvement and Participation					
BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Through Permit Year 1 (Reliance on non-municipal partners indicated, if any)	Goals for Permit Year 2 of 2017 NH Small MS4 General Permit
2.3	Link on website for reporting problems and deficiencies	Town Manager/Mark Pearson	Link on website and update annually	Conservation Commission and Normandeau developing database for surface water quality sampling results	Determine where the greatest impact to Kelly Brook is occurring.
				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.	Drinking water testing program planned to occur within next five years
				Conservation Commission hosted a booth at 2018 Old Home Day to promote water quality. However, while there was not a booth in 2019, the Selectmen had handouts/flyers at their booth.	Conservation Commission will reserve a booth at the 2020 Old Home Day to promote water quality
				Reviewed the process for reporting problems and deficiencies. Link on web site to complaint form. Complaints typically submitted by letter or phone call.	Review and revise process for submitting requests.
				- 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.	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 1 (Reliance on non-municipal partners indicated, if any)	Goals for Permit Year 2 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.	- 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.	The Highway Department will install additional watershed signs for Bryant Brook and Seaver Brook.
2.5	Encourage public participation in planting vegetation that would improve stormwater quality	Conservation Commission/Tim Moore	Plant at least 100 (native to NH) trees or shrubs/year	- Coordinated an Arbor Day events in 2018 and 2019 - Trees planted at Library and town hall in 2016 as part of Arbor Day events. - One American elm planted in 2018 as part of the Arbor Day event and another tree was planted at the Smith recreational fields	- Continue coordination with schools to plant trees with students on Arbor Day. - 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	The Town hosted a Plaistow Pride Town clean-up day which took place on Saturday, April 27, 2019, to remove litter/waste from roadsides throughout town. An event also took place in April 2018	Plaistow Pride Weekend to be planned for April 2020. This is a town wide effort to clean up litter along town roadways and in neighborhoods.
2.7	Public involvement regarding the SWMP	Town Manager/Mark Pearson	Public participation in the review and implementation of the SWMP	Written SWMP developed in Year 1	Encourage public review and comment through promotion on Town website

3. Illicit Discharge Detection and Elimination

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Through Permit Year 1 (Reliance on non-municipal partners indicated, if any)	Goals for Permit Year 2 of 2017 NH Small MS4 General Permit
3.1	Preparation of Master Drainage Plan	Town Manager/Mark Pearson	Delineation of outfalls to receiving waters	• Verified and ground-truthed location and condition of 30 stormwater infrastructure facilities during dry weather inspections.	• 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/Dee Voss (Planning Coordinator)	Ordinance adopted by Town and reviewed annually	• Reviewed stormwater related ordinances including Article XVI Stormwater – Illicit Discharge and Connection, Article XVIIA Stormwater – Post Construction, and Article XIXA Stormwater – Operation and Maintenance.	• 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. Illicit Discharge Detection and Elimination

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Through Permit Year 1 (Reliance on non-municipal partners indicated, if any)	Goals for Permit Year 2 of 2017 NH Small MS4 General Permit
3.3	Qualitative observation of discharge at outfalls	Conservation Commission/Tim Moore	Observations of delineated outfalls	- 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).	Any newly identified outfalls will be added to the outfall list and evaluated per the qualitative observation requirements.
3.4	Dry weather screening of outfalls	Conservation Commission/Tim Moore	Observations of delineated outfalls	- 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 1/3 per year; - Previous 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.	Conduct dry weather observations at outfall locations listed on inspection summary table for 2019 (1/3 of all locations or ~ 30 locations). To occur during the fall of 2019 following consecutive days of dry weather.

3. Illicit Discharge Detection and Elimination

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Through Permit Year 1 (Reliance on non-municipal partners indicated, if any)	Goals for Permit Year 2 of 2017 NH Small MS4 General Permit
3.5	Develop program for elimination of illicit discharges, if any.	Conservation Commission/Tim Moore	Development of Plan	Program has been developed.	- Review plan and make recommendations to improve program, if needed. - Program must be in both hardcopy and electronic form.
3.6	Implement program for elimination of illicit discharges, if any	Code Enforcement/Mike Dorman	Enforcement Actions taken	- 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. - Initial outfall screening and ranking	- 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 - Train employees on IDDE implementation annually - Develop a written catchment investigation procedure (hardcopy and electronic) - Develop and inventory of all sanitary sewer overflows (SSOs) within the last five (5) years. - Revise outfall screening and ranking

3a. Additions

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Through Permit Year 1 (Reliance on non-municipal partners indicated, if any)	Goals for Permit Year 2 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	- 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)	- 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 1 (Reliance on non-municipal partners indicated, if any)	Goals for Permit Year 2 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	- Ordinances already established. - Amendments are in review and will be presented to the planning board	- 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	Ordinances already established.	- 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	Ordinances already established.	- 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 1 (Reliance on non-municipal partners indicated, if any)	Goals for Permit Year 2 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 1 (Reliance on non-municipal partners indicated, if any)	Planned Activities Permit Year 2
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	Combined with BMP 2.3	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 1 (Reliance on non-municipal partners indicated, if any)	Goals for Permit Year 2 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	Ordinances were prepared in prior years.	- Evaluate ordinances and modify as needed. - Review other NH Town ordinances and compare with Plaistow. - Incorporate Low Impact Development (LID) site planning and design strategies - Selection and design of treatment and infiltration practices shall follow the guidance in Volume 2 of the New Hampshire Stormwater Manual - Stormwater management on new development and redevelopment BMPs (see Pages 47 and 48 of the 2017 MS4 Permit) - Salt storage areas on commercial and industrial new and redevelopment sites shall be covered and loading/offloading areas shall be designed and maintained in accordance with NH DES published guidance (Fact Sheets WD-WMB-410 and WD-DWGB-22-3011) - Snow storage areas shall be located in accordance with NH DES published guidance (Fact Sheets WD-WMB-4 and WD-DWGB-22-30)

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 1 (Reliance on non-municipal partners indicated, if any)	Goals for Permit Year 2 of 2017 NH Small MS4 General Permit
5.2	Develop procedures for Site Plan review and review of SWPPPs	Planning Board/Dee Voss (Planning Coordinator)	Adopt Subdivision and Site Review Amendments	- 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.	- Evaluate procedures and modify as needed. - Review other NH Town procedures and compare with Plaistow. - PCS inspections are expected to continue in 2020.
5.3	Promote open drainage systems and groundwater recharge through infiltration systems	Planning Board/Dee Voss (Planning Coordinator)	Adopt Subdivision and Site Review Amendments	- Ordinance was developed in 2004-2005. - Open drainage is promoted in town site plan review process	Create an LID development/stormwater ordinance to be part of the Town's zoning regulations.

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 1 (Reliance on non-municipal partners indicated, if any)	Goals for Permit Year 2 of 2017 NH Small MS4 General Permit
5.4	Develop procedures for site inspections, enforcement, fees	Code Enforcement/Mike Dorman	Develop procedures	- 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).	- 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 1 (Reliance on non-municipal partners indicated, if any)	Goals for Permit Year 2 of 2017 NH Small MS4 General Permit

5.5	Assessment of Impervious Cover	Planning Board/Dee Voss (Planning Coordinator)	Determine % imperviousness throughout Town	- Reviewed procedures/methods for calculating impervious cover (IC). - Reviewed funding possibilities for performing IC evaluation.	- 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. - 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 1 (Reliance on non-municipal partners indicated, if any)	Goals for Permit Year 2 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	Discussed components required for O&M plan at quarterly meetings.	- 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.

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 1 (Reliance on non-municipal partners indicated, if any)	Goals for Permit Year 2 of 2017 NH Small MS4 General Permit
6.2	Implement Employee Training Program	Highway Department/Dan Garlington	Train staff and review annually	- 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	- 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.

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 1 (Reliance on non-municipal partners indicated, if any)	Goals for Permit Year 2 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	- Cleaned 508 Town catch basins in November 2018 conducted by the Highway Supervisor and independent contractor. - Removed approximately 35 cubic yards of material in 2018, which is 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.	- 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	- Samples of street sweeping and catch basin material were laboratory analyzed in May 2016. - Street sweeping is done annually in the spring by an independent contractor hired by the Town. Street sweeping was conducted in June 2018 and June 2019. - In 2019, removed approximately 35 yards of material and a total of 44.5 hours of sweeping. Stockpiled at the Highway Department for future use consistent with NH regulations and guidance.	- Continue with annual street sweeping. Anticipated again in June 2020. - 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 1 (Reliance on non-municipal partners indicated, if any)	Goals for Permit Year 2 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 1	Goals for Permit Year 2 of 2017 NH Small MS4 General Permit
See BMPs 1.1; 1.5; 1.9; 1.10					

7a. Additions					
BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Through Permit Year 1	Goals for Permit Year 2 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 1	Goals for Permit Year 2 of 2017 NH Small MS4 General Permit
See BMPs 1.1; 1.5; 1.9; 1.10	None				

4. Summary of Information Collected and Analyzed

This section includes a summary of the Town of Plaistow's outfall screening and monitoring data and additional monitoring data collected during the first year covered under the 2017 MS4 permit. This section fulfills the reporting requirements of permit Part 4.4.2.5 – Outfall screening and monitoring data pursuant to Parts 2.3.4 and 4.3 and a description of additional monitoring data.

There are no known sanitary sewer overflows (SSOs) in Plaistow and therefore there is currently no SSO inventory as required in 2.3.4.4.d of the 2017 MS4 permit. A storm sewer system map has been produced and revised periodically since obtaining coverage under the 2003 NH MS4 permit. A storm sewer system map as required in 2.3.4.5 of the 2017 NH MS4 permit is in progress and is expected to be completed in 2020. An initial outfall and interconnection inventory and priority ranking to assess illicit discharge potential has been developed, consistent with 2.3.4.7 of the 2017 NH MS4 permit. Outfall screening is planned to commence in 2019 with approximately 1/3 of the outfalls planned for review, including any problem or high priority outfalls identified in the initial priority ranking. An outfall screening and sampling procedure has been developed and will be utilized for future outfall screenings per 2.3.4.7.

The Town of Plaistow 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 were 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 May 28, 2019 with *E. coli* values that ranged from <1-1,550 CTS/100 ml – with four samples having *E. coli* values above the state surface water quality standard of 406 CTS/100ml (Station “PCC #15”, Little River – Crane Crossing Road – 1,120 CTS/100 ml; station “PCC #4” Kelly Brook – Meadowview Drive – 1,050 CTS/100 ml; station “PCC#12 Seaver Brook – Main Street – 1,550 CTS/100 ml; and “PCC #17 Little River – Main Street – 580 CTS/100 ml). DNA testing of *E. coli* at the 21 surface water sample locations was not conducted in 2019. Additional *E. coli* DNA testing will be conducted in future surface sampling events to identify the sources of *E. coli* contamination. Sampling will continue to be conducted to assess the efficacy of best management practices being implemented within the stream watersheds.