

**New Hampshire Small MS4 General Permit
Annual Report**

Derry

Permit Year 2

EPA NPDES Permit Number NHR041005

Certification

Authorized Representative:

The authorization letter is:

- Attached to this document (document name listed below):

- Publicly available at the website:

https://www.derrynh.org/sites/g/files/vyhlif3026/f/pages/nh_ms4_authorization_derry_nhr041005.pdf

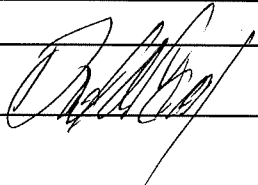
Instructions: Use the following language if signed by a person described in Appendix B.

“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

Signature



Date

9/21/20

Contact Information

Primary MS4 Program Manager Contact Information:

Name: Michael Fowler **Title:** Director, Department of Public Works
Street Address Line 1: Town of Derry
Street Address Line 2: 14 Manning Street
City: Derry **State:** NH **Zip Code:** 03038
Email: mikefowler@derrynh.org **Phone Number:** 603-432-6144
Fax Number: 603-432-6130

Small MS4 Authorization

The following annual report is intended to document the activities undertaken over the reporting period from July 1, 2019 through June 30, 2020 in accordance with the Notice of Intent (NOI). The 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 Town of Derry's Stormwater Management Plan (SWMP) and Illicit Discharge Detection and Elimination Plan (IDDE). Both of 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>

MCM1 - Public Education and Outreach

Year 2 Activities

BMP: Grass and Fertilizer

Document Name and/or Web Address:

“Green Grass & Clear Water” Brochure:

<https://www.derrynh.org/environmental/pages/stormwater-pollution-prevention>

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. Flyers are available at the Derry Municipal Center kiosk and an electronic version was previously distributed to the Beaver Lake Improvement Association for delivery to their membership via electronic newsletter

Targeted Audience:

Residential &/or Business and Institutions

Measurable Goal(s):

Lawn care enthusiast 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 numbers of flyers taken from kiosks and total membership of the BLIA.

In Year 2, 10 flyers were taken from the Town Hall kiosk.

Goal was achieved.

Message Date:

Due to Covid-19, the Derry Municipal Center closed in March 2020 and did not open again until after the reporting period, so the Town kiosk was not accessible to the public during this period.

BMP: Pet Waste Disposal

Document Name and/or Web Address:

Pet Waste Cleanup Signs

Description:

Permanent signs remain posted 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 remained low.

Message Date:

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

BMP: Pet Waste Disposal**Document Name and/or Web Address:**

"Every Drop" flyer

<https://www.derrynh.org/environmental/pages/stormwater-pollution-prevention>

Description:

Distributed customized "Every Drop" flyers with proper pet waste management, impacts of improper management, pet waste ordinance, and disposal requirements messaging to dog owners. The flyer included a message for pet owners to pledge to pick up pet waste and was made available during dog registration. Dog owners that provided email address to the Town Clerk were emailed an electronic version of the flyer. All others were mailed a hardcopy of the flyer by the Town Clerk. *Every Drop* is a collaborative education effort with PREP, NHDES and other partners.

Targeted Audience:

Residents - Pet Owners

Measurable Goal(s):

Electronic flyers were emailed to 2500 dog owners while hard copy flyers were mailed to approximately 2000 dog owners. 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. If pledges are signed, there will be an increase of dog owners committed to picking up pet waste.

In Year 2, approximately 4500 dog owners were sent either electronic or hard copy flyers of the outreach flyer. Five residents pledged through the PREP "Every Drop" website while one resident mailed back a signed hardcopy pledge. **Goal was achieved.**

Message Date: Time of license renewal – Spring 2020

BMP: Disposal of Leaf and Grass Clippings**Document Name and/or Web Address:**

"Rake It or Leave It" Brochure:

<https://www.derrynh.org/environmental/pages/stormwater-pollution-prevention>

Description:

Distributed and promoted informational brochure with messaging about impacts from yard waste to waterbodies, alternatives to dumping yard waste and laws against dumping yard waste near or

in waterbodies.

Targeted Audience:

Residential &/or Business and Institutions

Measurable Goal(s):

Residents become aware of the water quality impacts of yard waste dumping near or in water bodies and safe alternatives for yard waste disposal. 12 flyers were taken from the Derry Municipal Center kiosk

Goal was achieved.

Message Date:

Fall 2019 – Uploaded to Website and made available at the Derry Municipal Center kiosk.

Due to Covid-19, the Derry Municipal Center closed in March 2020 and did not open again until after the reporting period, so the Town kiosk was not accessible to the public during this period.

BMP: Septic System Maintenance

Document Name and/or Web Address:

- 1) *SepticSmart Week* September 16-20, 2019 Press Release
- 2) *Get Pumped Brochure*
<https://www.derrynh.org/environmental/pages/stormwater-pollution-prevention>
- 3) *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/environmental/pages/stormwater-pollution-prevention>

Description:

Issue Press Release coincident with USEPA’s SepticSmart Week September 16-20, 2019 and post on website information educating Derry homeowners with septic systems on how to identify, locate and maintain those systems.

Publish “Get Pumped” brochure on website and make available at Derry Municipal kiosk. Get Pumped NH is a collaborated effort between the New Hampshire Association of Septage Haulers (NHASH) and the New Hampshire Department of Environmental Services (NHDES).

Targeted Audience:

Septic System Owners

Measurable Goal(s):

- 1) Two free weekly newspapers published articles supporting the Town’s outreach effort regarding SepticSmart Week.
- 2) 22 “Get Pumped” brochures were taken from the Municipal Center kiosk.
- 3) No failed septic systems during reporting period

Residents become aware of water quality impacts from septic systems, the importance of maintaining septic systems and how to maintain them

Goal was achieved.

Message Dates:

Press Release - September 2019 prior to Septic Smart Week.

September 12, 2019 – Derry News article: Residents Urged to be ‘SepticSmart’

September 26, 2019 – Nutfield News article: Derry Residents Urged by Officials to be “SepticSmart”

Due to Covid-19, the Derry Municipal Center closed in March 2020 and did not open again until after the reporting period, so the Town kiosk was not accessible to the public during this period.

BMP: Sanitary Sewer Overflow and Backup Prevention

Document Name and/or Web Address:

- 1) “What’s Flushable?” Brochure
<https://www.derrynh.org/environmental/pages/stormwater-pollution-prevention>
- 2) “What’s Flushable” Press Release – Shared by Nutfield News on their social media page

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.

Due to Covid-19, significantly more residents were staying home and there was a toilet paper shortage leading to residents resorting to “non-flushable wipes” or paper products not meant to be flushed.

Targeted Audience:

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

Measurable Goal(s):

Residents become 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.

There were no sewer backups due to flushing “non-flushable” items during the reporting period.

Message Date:

- Continuous throughout reporting period – Placed flyers in kiosks at the Derry Municipal Center and The Derry Parks and Recreation Department
- Continuous - Flyer posted on website (see link above)
- Press Release – March 16, 2020

Due to Covid-19, the Derry Municipal Center closed in March 2020 and did not open again until after the reporting period, so the Town kiosk was not accessible to the public during this period.

BMP: Sanitary Sewer Overflow and Backup Prevention

Document Name and/or Web Address:

“Derry Guide to Sump Pump Connections” Brochure

<https://www.derrynh.org/environmental/pages/stormwater-pollution-prevention>

Description:

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

Targeted Audience:

Resident homeowners that are connected to municipal sewer and have sump pumps or are considering installing sump pumps.

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.

Message Date:

- Continuous throughout reporting period – Placed flyers in kiosks at the Derry Municipal Center and The Derry Parks and Recreation Department
- Continuous - Flyer posted on website (see link above)

Due to Covid-19, the Derry Municipal Center closed in March 2020 and did not open again until after the reporting period, so the Town kiosk was not accessible to the public during this period.

BMP: Stormwater Pollution

Document Name and/or Web Address:

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

<https://www.derrynh.org/environmental/pages/stormwater-pollution-prevention>

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):

30 brochures were taken from Municipal Center kiosk.

Message Date:

- Continuous – Placed flyers in kiosks at the Derry Municipal Center and The Derry Parks and Recreation Department for last several years.

- Flyer posted on website (see link above)

BMP: Commercial/Developer Outreach - CANCELLED DUE TO COVID-19 (Resched 3/2021)

Description:

Landscaping for Water Quality Class March 26 and 27, 2020

The Town of Derry partnered with NHDES an UNH-T2 to hold a 2-day class teaching participants how to use ecological concepts and landscape features such as rain gardens, vegetative buffers, and other green infrastructure to protect lakes, rivers, streams, and bays. The scheduled instructors were from universities, university extension, environmental agencies, municipalities, and private enterprise. The class was to be held at the Derry Municipal Center and would use the nearby Hood Pond Park and an outdoor classroom for an in-class water quality landscape design exercise. A panel discussion consisting of representatives from Derry, Londonderry, and the Beaver Lake Improvement Association was scheduled. Hood Pond is impaired for phosphorus and bacteria and the Town would consider implementing landscaping design ideas generated in the class by participants possible future site improvements.

The Town helped prepare classroom materials and shared mailing/notification responsibility by reaching out to companies in the immediate region while DES/UNH conducted state-wide outreach. The Town initiated outreach with a news article in October 2019.

Targeted Audience:

Commercial -Landscape designers, contractors, maintenance professionals, and those who hire them; watershed groups; and municipal employees.

Measurable Goal(s):

Attendees would be made aware of how landscaping activities affect stormwater runoff and adjacent surface waters and how to improve their practices to protect surface water quality. Lessons learned from the class would be implemented in addressing Hood Pond water quality issues (phosphorus and bacteria).

Message Date:

October 3, 2019 – Nutfield News Article – Lakefront Seminars Offered to Local Property Owners

January 22, 2020 – The Town mailed announcements to 63 landscaping and property maintenance companies located in Derry and the surrounding communities.

**DUE TO COVID-19, ALL CLASSROOM TRAINING WAS CANCELLED
THIS EVENT IS RESCHEDULED FOR MARCH 2021.**

MCM2 - Public Participation

BMP: Public Participation in Stormwater Management Program Development

Description: The Stormwater Management Program is publicly available for review on the Town's website.

Measurable Goal(s): Receipt of input or comments from the public. No comments received

BMP: Shoreline Cleanup

Description:

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

This year, a BLIA member installed two trash receptacles at popular roadside fishing spot on Beaver Lake and one at another parking location outside the Galliens Town Beach. The BLIA member routinely empties the trash receptacles.

Due to Covid-19, no organized shoreline cleanup occurred in the spring. Instead, BLIA members conducted random spring cleanup on their own schedules.

Participating Party:

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

Measurable Goal(s):

Fall Shoreline Cleanup was organized and conducted BLIA members.

New trash receptacles installed at problem locations and are maintained by BLIA volunteers.

Activity Date:

- October 2019 – BLIA organized shoreline cleanup day
- April 2019 – BLIA members conducted their own random shoreline cleanup activities.
- Spring 2020 – BLIA member installed trash receptacles at problem locations

BMP: Hood Park/Hood Pond Stakeholder Group Development

Description:

Bring community stakeholders together that have an interest in the revitalization of Hood Park and Hood Pond. The Town Economic Development Director with assistance from the Planning Department, initiated an effort to bring together community stakeholders that had an interest in improving and revitalizing Hood Park and Hood Pond, which is impaired for phosphorus. Hood Pond public beach have been closed for the past few years. There were various community organizations in town that had their own ideas as to what could happen with the Park.

The intent of the Economic Development team was to bring all these stakeholders together, create an outreach and engagement plan, and find out what the community wanted to see or envisioned for the future of the Park and Pond. UNH recently completed a Recreational Needs Assessment for the town and identified Hood Park as one of its assets; Hood Park was also

identified as an asset in the recently updated Master Plan.

Participating Party:

Town Economic Development Team, Planning Department, and Town Council member, Town residents including Hood Pond abutters, and park users.

Measurable Goal(s):

- Submit application for 2020 AARP Community Challenge Grant to assist in outreach and engagement to obtain input to create a cohesive vision for the future of Hood Park and Hood Pond.
- Bring together interested community stakeholders and form Steering Committee.

Activity Date:

- Early Spring 2020 – Apply for 2020 AARP Community Challenge Grant

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 resident of Derry and Londonderry. These are events are held at no charge to residents.

*The Town always uses this opportunity to distribute outreach material to residents. Due to Covid-19 social distancing requirements, strict distancing guidelines were implemented eliminating close contact with attendees and therefore no outreach was performed during this event.

Participating Party:

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

Measurable Goal(s):

Number of participants and the quantity of HHW received

- 498 Households represented (311 Derry, 187 Londonderry) a 46% increase over the previous year.
- 39,047 lbs of HHW collected and kept out of the environment or solid waste wastestream.

Activity Date:

- November 17, 2019 (sponsored by and held in Londonderry)
- March Through May - Outreach included notices and announcements made though the community section of the local newspaper (Nutfield News and Londonderry Times), each televised Town Council meeting held twice per month and the Conservation Commission monthly meetings, signs temporarily affixed guard shack at Transfer Station entrance, reader board at entrance to Transfer Station, notice sent out to subscribers of the Town's ListServ, Derry's and Londonderry's newsletters, posts on several different webpages within Derry's and Londonderry's website, and posted on social media (Facebook) pages including *Town of Derry*, *Derry Community Access Media*, *Bringing Derry Together*, and *Marion Gerrish Community Center* Facebook pages.
- June 6, 2020 – Derry HHW collection event (Rescheduled from May due to Covid-19)

BMP: Pet Waste Cleanup Signs

Description:

The apartment management company at an 849-unit apartment complex development consisting of 31 buildings continues to keep their own signs posted 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 (CANCELLED DUE TO COVID-19)

Description:

The Town advocates and supports employees who volunteer for events. At the Touch-A-Truck event, the Department of Public Works Highway Division displays several winter maintenance vehicles and equipment and set up a display on salt reduction as well as stormwater pollution prevention for homeowners. Employees and the Superintendent of Operations volunteer their time to be present and answer questions and distribute outreach material.

Participating Party:

Public Works Employees

Targeted Audience:

Residents (children and adults)

Measurable Goal(s):

Number of employees volunteered: NA

Activity Date:

CANCELLED DUE TO COVID-19 (Previously scheduled for June 6, 2020)

BMP: Roadside Cleanup – CANCELLED DUE TO COVID-19

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 a spring

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.

Activity Dates:

CANCELLED DUE TO COVID-19.

MCM3 – Illicit Discharge Detection and Elimination

BMP: IDDE 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 updated the SSO inventory in accordance with permit conditions. The inventory identified SSOs during the last 5 years. A table summary of all SSOs are included in Table B-2 of the Derry IDDE and is attached to this report. 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 during this reporting period.

Number of SSOs identified not entering MS4 system: 1

Number of SSOs removed not entering MS4 system: 1

During Year Two of the Permit, there was one line break. The break occurred in the effluent line that carries treated wastewater from our treatment plant to its discharge point under a separate NPDES permit. Some of the treated wastewater entered an adjacent wetland. The SSO was reported to USEPA and NHDES and immediately repaired. Discussions are ongoing for inclusion into the Town's Capital Improvement Program for complete replacement of the specific section of effluent line that broke.

BMP: Map of Storm Sewer System

Map of storm sewer system and associated outfalls is continually being updated and is a work in progress. 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).

Recent outfall inspections have documented that 21 fewer outfalls discharge to surface waters than originally reported. Corrections are also being made relative to ownership: Some stormwater systems have been identified as either being owned by NH Department of Transportation or private entities.

BMP: IDDE Program

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

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

Initial outfall identification, characterization and prioritization has been completed and included

in the IDDE plan.

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

- Number of dry weather outfall investigations/screenings:
 - 33 stormwater outfall pipes were inspected.
 - 2 outfalls directly discharging to surface water were identified and sampling was conducted on June 29, 2019. Analytical results were received during the next reporting period. The results and the any follow-up investigation will be reported in the Year 3 annual report.

Number of wet weather outfall inspections/sampling events: 0

Number of illicit discharges removed: 1 (see next section)

Estimated gallons of flow removed: 0 (sediment only)

BMP: Illicit Discharges Identified

During the reporting period, one illicit discharge was rectified from the previous reporting period, and the Town responded to one alleged illicit discharge to the MS4.

Illicit Discharge Removed:

6/13/19 Incident #19-002 Follow up from previous reporting period

The State-owned Derry Municipal Courthouse discharge involving sediment and concrete from their failed storm drain system was closed in August 2019. The State hired a catchbasin cleaning company to clean their catchbasins and prevent further discharge of sediment and debris to the interconnected Town MS4 system. The Town also cleaned all its own catchbasins immediately downgradient of the State's stormwater system.

7/05/19 Incident #19-003

The Town received notice from a DES employee regarding a pipe discharging to a brook from a private residence. The environmental coordinator and assistant building inspector visited the site and determined that a sump pump was discharging uncontaminated groundwater. This is an allowable discharge under federal, state, and local rules. While the location is considered with the EPA-defined MS4 regulated area, there is no MS4 infrastructure near that location and therefore infrastructure was not impacted. No further action.

BMP: Employee Training – IMPACTED DUE TO COVID-19

Impacted by Covid-19: The Town conducts regular group training of all public works employees in the Spring of each year. This year's training was going to include IDDE training. Due to Covid-19 and State of NH Executive Order, all off-site and on-site group training was cancelled. Instead employees are only provided individual word-of-mouth training when possible or brief overview training during morning kickoff meetings while maintaining social distancing. Three employees were scheduled to attend the March 2020 *Landscaping for Water Quality* class that was cancelled due to Covid-19.

During the reporting period, staff also attended training on the following:

July 7, 2019 – Three Highway Department employees participated in UNH-T2 Erosion Training.

June 15, 2020 – Morning Kickoff meeting: Superintendent of Operations provided Highway crews with basic training on illicit discharges including how to identify and report unusual discharges while performing field work.

Virtual training is still being organized and will be implemented when complete. Training logs will be included in Appendix F of the IDDE report.

MCM4 – Construction Site Stormwater Runoff Control

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 Town'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: 3

(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: 305

(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: 0

(While no actual enforcement actions were initiated. Deficiencies identified during inspections are addressed at time of inspection)

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/public-works/pages/forms-applications>

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/g/files/vyhlf3026/f/uploads/derry_nh_storm_water_system_design_regulations_-_final.pdf

Land Development Control Regulations:

<https://ecode360.com/7626031>

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/g/files/vyhlf3026/f/uploads/derry_nh_storm_water_system_design_regulations_-_final.pdf

MCM5 – Post Construction Stormwater Management in New Development and Redevelopment

BMP: Post-Construction Ordinance or Regulation

Requirements for preparation of an Operation and Maintenance Plan, the recording of the plan, and record keeping are included in Section 4.B.10 through 13 of the Derry Stormwater System Design Regulations.

Stormwater System Design Regulations:

https://www.derrynh.org/sites/g/files/vyhlf3026/f/uploads/derry_nh_storm_water_system_design_regulations_-_final.pdf

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://ecode360.com/7626031>

Stormwater System Design Regulations:

https://www.derrynh.org/sites/g/files/vyhlf3026/f/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: Parks and Open Spaces Operations and Maintenance Procedures (due year 2)

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

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

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

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

The Town's Vehicle Maintenance Facility schedules routine maintenance (oil changes) for all vehicles. The Town on-line ticket/work order system was developed to schedule needed repairs or maintenance.

BMP: Catch Basin Cleaning Program

A schedule for catch basin cleaning has been previously established with the cleaning 750 catch basins per year. Most of the catchbasins cleaned rotate each year to ensure town-side coverage. The Town continues to review historical data and is setting up a spreadsheet 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 updated form which omitted key information (depth to outlet pipe). During the previous reporting period, the Town developed a catchbasin inspection and cleaning form, however this form had not been forwarded to the contractor for their use.

Contracting with and initiating catchbasin cleaning with our catchbasin cleaning contractor was delayed in the spring 2020 and did not begin until June. As a result, only 339 catchbasins were cleaned prior to July 1, 2020. The cleaning continued into July until all 750 were cleaned.

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

Number catchbasins inspected in accordance with the SWMP: 339

Number of catchbasins cleaned: 339 prior to June 30, 2020. The remaining 411 were cleaned in July 2020.

Volume or mass of material removed: ~ approximately 20 cubic yards total for the 750 catchbasins. The total material removed each year has shown a decrease in volume.

BMP: Street sweeping program

The established street sweeping program continues 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), or significant erosive storm events.

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>Year 2</u> |
|--|---------------|
| Number of arterial (lane) miles swept twice/week (April – November): | 12 |
| Number of curbed lane miles swept a minimum of once per year: | 40 |
| Number of lane miles swept every other week at Transfer Lane: | 1.6 |
| Acres of municipal parking lots swept each year | 2.9 |
| Volume or mass of swept material: | ~50 cu.yds |

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.

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 collected information during outfall inspections with a goal of inventorying and formally inspecting all municipally owned BMPs. SOPs and inventory updates 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 10/01/19)

<https://www.derrynh.org/transfer-station/pages/transfer-station-reports>

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 scheduled inspections as well as periodic unannounced inspections are conducted quarterly by the Environmental Coordinator and reported under the USEPA MSGP program. During this reporting period, all quarterly inspections for facilities under the SWPPP, both regulated under the MSGP and those not specifically MSGP sites, are accompanied by the assigned facility manager.

During the reporting period, the Buildings and Ground Division of Public Works finished relocation 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. The Buildings and Grounds building, there is no exposure to stormwater as it is only used for inside equipment storage.

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.

Extensive outreach has been conducted regarding pet waste disposal during this permit year as described previously.

The Town has also identified a significant concern relative to waterfowl waste as a contributor of bacteria at Hood Pond. NHDES expressed the same concern during a site walk of Hood Park as part of the scheduled (and subsequently cancelled due to Covid-19) Landscaping for Water Quality Class. Signs informing residents not to feed waterfowl are already in place. The Town is evaluating additional options to deter waterfowl such as application of Goose Repellent to the Hood Park lawns or the use of dogs.

Phosphorus

- 1) 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. This includes extensive outreach regarding management of yard waste and proper fertilizer use.
- 2) The Landscaping for Water Quality Class, cancelled due to Covid-19 restrictions and described earlier, would have provided important outreach and training for local landscape designers and lakefront property owners with a focus on the Hood Park and Hood Pond area.
- 3) Hood Pond/Hood Park Revitalization - The Town Economic Development Director with assistance from the Planning Department, initiated an effort to bring together community stakeholders that had an interest in improving and revitalizing Hood Park and Hood Pond, which is impaired for phosphorus. Hood Park and the associated public beach have been closed for the past few years. There were various community organizations in town that had their own ideas as to what could happen with the Park – ranging from an arboretum, installation of some form of public arts, perhaps the addition of a small splash pad, etc. Each group was working in isolation. The intent of the Economic Development team was to bring all these stakeholders together, create an outreach and engagement plan, and find out what the community wanted to see or envisioned for the future of the Park and Pond. UNH recently completed a Recreational Needs Assessment for the town and identified Hood Park as one of its assets. Hood Park was also identified as an asset in the recently updated Master Plan.

Early this spring, the Economic Development team applied for the 2020 AARP Community Challenge Grant. We asked for \$20,000 to assist in outreach and engagement to obtain input to create a cohesive vision for the future of Hood Park and Hood Pond. The application was submitted at the end of April 2020 and the Town was informed mid-July that it was not awarded the grant.

In early July, a stakeholder group was identified by the Economic Development team and brought together to discuss the creation of the Steering Committee. Attendees were

enthusiastic and meetings have been ongoing. To date, the Town Council recently identified the revitalization of Hood Park as one of its top five goals. The Town has a Memorandum Of Understanding with UNH Cooperative Extension to assist in guiding the outreach and engagement efforts. The Steering Committee is getting off the ground and has clearly identified it is not an advocacy group, but rather clearly engaged in the collection of information from the community. A report will be prepared, outlining all the data collected from the community and this will be presented to Town Council to assist in guiding their policy for the next few fiscal years. The Steering Committee will not decide the fate of the Park or Pond but will provide information so that Town Council can make an informed decision.

All information about the Steering Committee and this effort is available at:

<https://www.derrynh.org/economic-development/webforms/hood-park-steering-committee>

- 4) Legal analysis of existing regulatory mechanisms available to the MS4 has been completed and is included in the SWMP.
- 5) Derry is still inventorying its existing BMPs and through its participation in the Lower Merrimack Valley Stormwater Coalition and continued involvement with the NHDES led Pollutant Tracking and Accounting Program (PTAP), 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 have been ranked as high priority for the IDDE implementation in the initial outfall ranking.

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.

Tracking of the amount of salt applied to all municipally owned and maintained surfaces and reporting of salt use has been completed by either reporting directly to NHDES or using the UNH T2 online tool.

The Town continues to use BMPs identified in the Town's Salt Reduction Plan. These include equipment and operations BMPs.

The Town of Derry 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, and modifications to driving behavior in winter weather as listed in Attachment 1 to Appendix H.

The municipal Green Snow Pro legislation was delayed due to COVID-19 and will be revisited during the 2021 legislative session.

Activities for the Next Reporting Cycle

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

