

# Year 2 Annual Report

## New Hampshire Small MS4 General Permit

Reporting Period: July 1, 2019 – June 30, 2020

*\*\*Please do not attach any documents to this form. Instead, attach all requested documents to an email when submitting the form\*\**

*Unless otherwise noted, all fields are required to be filled out. If a field is left blank, it will be assumed the requirement or task has not been completed. Please ONLY report on activities between July 1, 2019 and June 30, 2020 unless otherwise requested.*

### Part I: Contact Information

Name of Municipality or Organization:

EPA NPDES Number:

#### Primary MS4 Program Manager Contact Information:

Name:  Title:

Department:

Phone Number:  Email:

Address:

City:  State:

Zip:  Fax Number:

#### Stormwater Management Program (SWMP) Information:

SWMP Location (web address):	<a href="https://arcg.is/1nmPa1">https://arcg.is/1nmPa1</a>
Date of Last Update:	June 30, 2020

## Part II: Self-Assessment

First, in the box below, select the impairment(s) and/or TMDL(s) that are applicable to your MS4.

<b>Impairment(s)</b>	<input type="checkbox"/> Bacteria/Pathogens	<input checked="" type="checkbox"/> Chloride	<input type="checkbox"/> Nitrogen	<input checked="" type="checkbox"/> Phosphorus
	<input checked="" type="checkbox"/> Solids / Oil / Grease (hydrocarbons) / Meals			
<b>TMDL(s)</b>	<input checked="" type="checkbox"/> Bacteria/Pathogens	<input type="checkbox"/> Chloride	<input type="checkbox"/> Lake and Pond Phosphorus	

Next, check off all requirements below that have been completed. **By checking each box, you are certifying that you have completed that permit requirement fully.** If you have not completed the requirement, leave the box unchecked. Additional information will be requested in later sections.

### Year 2 Requirements:

- Completed Phase I of system mapping
- Developed a written catchment investigation procedure and added the procedure to the SWMP
- Developed written procedures to require the submission of as-built drawings and ensure the long term operation and maintenance of completed construction sites and added these procedures to the SWMP
- Enclosed or covered storage piles of salt or piles containing salt used for deicing or other purposes
- Developed written operations and maintenance procedures for parks and open space, buildings and facilities, and vehicles and equipment and added these procedures to the SWMP
- Developed an inventory of all permittee owned facilities in the categories of parks and open space, buildings and facilities, and vehicles and equipment and added this inventory to the SWMP
- Completed a written program for MS4 infrastructure maintenance to reduce the discharge of pollutants
- Developed written SWPPPs, included in the SWMP, for all of the following permittee owned or operated facilities: maintenance garages, public works yards, transfer stations, and other waste handling facilities where pollutants are exposed to stormwater

Optional: If you would like to describe progress made on any incomplete requirements listed above, provide any additional information, and/or if any of the above year 2 requirements could not be completed due to the impacts of COVID-19, please identify the requirement that could not be completed, any actions taken to attempt to complete the requirement, and reason the requirement could not be completed below:

### Annual Requirements:

- Provided an opportunity for public participation in review and implementation of SWMP
- Kept records relating to the permit available for 5 years and made available to the public
- The SSO inventory has been updated, including the status of mitigation and corrective measures

Implemented

- This is not applicable because we do not have sanitary sewer
- This is not applicable because we did not find any new SSOs
- The updated SSO inventory is attached to the email submission
- The updated SSO inventory can be found at the following website:

- Properly store and dispose of catch basin cleanings and street sweepings so they do not discharge to receiving waters.
- Provided training to employees involved in IDDE program within the reporting period
- All curbed roadways have been swept a minimum of one time per year.
- Updated outfall and interconnection inventory and priority ranking as needed

**Bacteria / Pathogens** (Combination of Impaired Waters Requirements and TMDL Requirements as Applicable)

Annual Requirements:

*Public Education and Outreach\**

- Annual message was distributed encouraging the proper management of pet waste, including noting any existing ordinances where appropriate.
- Permittee or its agents disseminated educational material to dog owners at the time of issuance or renewal of dog license, or other appropriate time
- Provided information to owners of septic systems about proper maintenance in any catchment that discharges to a water body impaired for bacteria

*\*Public education messages can be combined with other public education requirements as applicable (see appendix H and F for more information)*

*Optional: If you would like to describe progress made on any incomplete requirements listed above or provide any additional details, please use the box below:*

**Chloride Impairment**

Annual Requirements:

*Optional: If you would like to describe progress made on any incomplete requirements listed above or provide any additional details, please use the box below:*

**Nitrogen Impairment**

Annual Requirements:

*Public Education and Outreach\**

- Distributed an annual message in the spring (April/May) that encourages the proper use and disposal of grass clippings and encourages the proper use of slow-release fertilizers
- Distributed an annual message in the summer (June/July) encouraging the proper management of pet waste, including noting any existing ordinances where appropriate
- Distributed an annual message in the fall (August/September/October) encouraging the proper disposal of leaf litter

*\*Public education messages can be combined with other public education requirements as applicable (see Appendix H and F for more information)*

*Good Housekeeping and Pollution Prevention for Permittee Owned Operations*

Increased street sweeping frequency of all municipal owned streets and parking lots subject to Permit part 2.3.7.a.iii.(c) to a minimum of two times per year (spring and fall)

*Potential Structural BMP's*

Any structural BMPs listed in Table 3 of Attachment 1 to Appendix H already existing or installed in the regulated area by the permittee or its agents was tracked and the nitrogen removal by the BMP was estimated consistent with Attachment 1 to Appendix H. The BMP type, total area treated by the BMP, the design storage volume of the BMP and the estimated nitrogen removed in mass per year by the BMP were documented.

- The BMP information is attached to the email submission
- The BMP information can be found at the following website:

*Optional: If you would like to describe progress made on any incomplete requirements listed above or provide any additional details, please use the box below:*

*The Goffstown DPW office was closed March-July 2020, therefore no additional public outreach was completed. Brochures were available at multiple municipal offices and businesses around town, however, these too were closed at times. The brochures and audience-specific websites were available 24/7 during the shutdown.*

**Solids, Oil and Grease (Hydrocarbons), or Metal Impairments**

Annual Requirements:

*Good Housekeeping and Pollution Prevention for Permittee Owned Operations*

Increase street sweeping frequency of all municipal owned streets and parking lots to a schedule that targets areas with potential for high pollutant loads.

*Optional: If you would like to describe progress made on any incomplete requirements listed above or provide any additional details, please use the box below:*

**IDDE Ordinance** - On March 11th, 2008 the Town of Goffstown voted in a number of changes to the Towns Zoning ordinance which should provide the necessary authority to manage storm water concerns as required under the MS4 permit. Primarily, a new section (Section 12) related to stormwater was added to the ordinance. The language gives the Town's Code Enforcement officer authority to regulate stormwater related activities in response to NHDES and EPA requirements. Additionally, specific details for dealing with storm water shall be adopted by the Goffstown Planning Board as part of the Development Regulations. A specific IDDE Ordinance has not been completed at this time.

**Develop written procedures for site inspections and enforcement of sediment and erosion control measures** – DPW has drafted a stormwater and land management ordinance and is working on getting it approved by the Select Board.

**Structural BMPs** – Not applicable - the Town does not have any relevant structural BMPs.

## Part III: Receiving Waters/Impaired Waters/TMDL

Have you made any changes to your list of receiving waters, outfalls, or impairments since the NOI was submitted?

Yes       No

If yes, describe below, including any relevant impairments or TMDL's:

## Part IV: Minimum Control Measures

Please fill out all of the metrics below. If applicable, include in the description who completed the task if completed by a third party.

### MCM1: Public Education

Number of educational messages completed during the reporting period: 9

Below, report on the educational messages completed during the first year. For measurable goal(s) please describe the method/measures used to assess the overall effectiveness of the educational program.

<b><u>BMP:</u></b>	Stormwater Page on Website
<b>Message Description and Distribution Method:</b>	Stormwater Information, Available on the Town's Website
<b>Targeted Audience:</b>	General Public, residents, businesses, engineers, contractors
<b>Responsible Department/Parties:</b>	Department of Public Works/IT
<b>Measureable Goal(s):</b>	Working with IT to establish a view tracker – once IT has established that, we will track the number of website hits
<b>Message Date(s):</b>	June 1, 2018-present
Message Completed for:	<input type="checkbox"/> Appendix F Requirements <input type="checkbox"/> Appendix H Requirements
Was this message different than what was proposed in your NOI?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

<b><u>BMP:</u></b>	Stormwater Brochures
<b>Message Description and Distribution Method:</b>	Brochures for each audience, Available on the Town's Website, at Town Hall, local hardware store, Town Library, and DPW.
<b>Targeted Audience:</b>	Residents, Businesses, Developers, Industrial
<b>Responsible Department/Parties:</b>	Department of Public Works
<b>Measureable Goal(s):</b>	Number of brochures handed out
<b>Message Date(s):</b>	September 10, 2018-present
Message Completed for:	<input checked="" type="checkbox"/> Appendix F Requirements <input checked="" type="checkbox"/> Appendix H Requirements
Was this message different than what was proposed in your NOI?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

<b><u>BMP:</u></b>	Storm Drain Stenciling
<b>Message Description and Distribution Method:</b>	Storm drains are marked to remind residents that they drain to local water bodies
<b>Targeted Audience:</b>	General Public, residents, businesses
<b>Responsible</b>	Department of Public Works

<b>Department/Parties:</b>	
<b>Measureable Goal(s):</b>	Number of drains marked
<b>Message Date(s):</b>	July 2019 – annually each summer
<b>Message Completed for:</b>	<input type="checkbox"/> Appendix F Requirements <input type="checkbox"/> Appendix H Requirements
<b>Was this message different than what was proposed in your NOI?</b>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

<b><u>BMP:</u></b>	Stormwater Information Webpages
<b>Message Description and Distribution Method:</b>	DPW Interns developed a stormwater information webpages for each of our targeted audiences
<b>Targeted Audience:</b>	Residents, businesses, engineers, contractors
<b>Responsible Department/Parties:</b>	Department of Public Works
<b>Measureable Goal(s):</b>	Number of views
<b>Message Date(s):</b>	May 2019-present
<b>Message Completed for:</b>	<input checked="" type="checkbox"/> Appendix F Requirements <input checked="" type="checkbox"/> Appendix H Requirements
<b>Was this message different than what was proposed in your NOI?</b>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

## MCM2: Public Participation

Describe the opportunity provided for public involvement in the development of Stormwater Management Program (SWMP) during the reporting period:

The SWMP was posted to our Stormwater Webpage. We created a specific email address for accepting feedback on the document and encouraged people to email us with suggestions.

The SWMP was available for viewing and discussion at National Night Out held on August 6<sup>th</sup> at Goffstown High School. We advertised the event and public opportunity for comment on Facebook and DPW’s website.

Was this opportunity different than what was proposed in your NOI?

Yes       No

Describe any other public involvement or participation opportunities conducted during the reporting period:

We have an adopt-a-spot program to focus on cleaning up litter around town. We have very active participation from the public in this program this year.

A representative from DPW attends regular stormwater coalition meetings for the Manchester & Nashua Stormwater Coalition. We find that interacting with other communities helps give us ideas for new initiatives we can implement in town.

## MCM3: Illicit Discharge Detection and Elimination (IDDE)

### Sanitary Sewer Overflows (SSOs)

Below, report on the number of SSOs identified in the MS4 system and removed during this reporting period.

Number of SSOs identified:

Number of SSOs removed:

Below, report on the total number of SSOs identified in the MS4 system and removed to date. At a minimum, report SSOs identified since 2013.

Number of SSOs identified:

Number of SSOs removed:

### MS4 System Mapping

Below, check all that apply.

The following elements of the Phase I map have been completed:

- Outfalls and receiving waters
- Open channel conveyances
- Interconnections
- Municipally-owned stormwater treatment structures
- Waterbodies identified by name and indication of all use impairments
- Initial catchment delineations

Describe any additional progress you made on your map during this reporting period or provide additional status information regarding your map:

We have mapped 100% of outfalls and receiving waters and initial catchment delineations. We have mapped a majority of the Town's pipes, manholes, catch basins, municipal sanitary sewer system.

### Screening of Outfalls/Interconnections

If conducted, please submit any outfall monitoring results from this reporting period. Outfall monitoring results should include the date, outfall/interconnection identifier, location, weather conditions at time of sampling, precipitation in previous 48 hours, field screening parameter results, and results from all analyses.

- The outfall screening data is attached to the email submission
- The outfall screening data can be found at the following website:

<https://arcg.is/1nmPa1>

Below, report on the number of outfalls/interconnections screened during this reporting period.

Number of outfalls screened:

Below, report on the percent of total outfalls/interconnections screened to date.

Percent of total outfalls screened:

During our outfall inspections, all of the outfalls were dry. There was no water to sample. If/when we have flow to screen, our screening results will be posted on the website.



**Catchment Investigations**

*If conducted, please submit all data collected during this reporting period as part of the dry and wet weather investigations. Also include the presence or absence of System Vulnerability Factors for each catchment.*

- The catchment investigation data is attached to the email submission.
- The catchment investigation data can be found at the following website:

<https://arcg.is/1nmPa1>

*Below, report on the number of catchment investigations completed during this reporting period.*

Number of catchment investigations completed during this reporting period:

*Below, report on the percent of catchments investigated to date.*

Percent of total catchments investigated:

*Optional: Provide any additional information for clarity regarding the catchment investigations below:*

We had limited staffing July-Aug 2019 and May-July 2020.

**IDDE Progress**

*If illicit discharges were found, please submit a document describing work conducted over this reporting period, and cumulative to date, including location source; description of discharge; method of discovery; date of discovery; and date of elimination, mitigation, or enforcement OR planned corrective measures and schedule of removal.*

- The illicit discharge removal report is attached to the email submission.
- The illicit discharge removal report can be found at the following website:

<https://arcg.is/1nmPa1>

*Below, report on the number of illicit discharges identified and removed, along with the volume of sewage removed during this reporting period.*

Number of illicit discharges identified:

Number of illicit discharges removed:

Estimated volume of sewage removed:

*Below, report on the total number of illicit discharges identified and removed to date. At a minimum, report on the number of illicit discharges identified and removed since the effective date of the permit.*

Total number of illicit discharges identified:

Total number of illicit discharges removed:

*Optional: Provide any additional information for clarity regarding illicit discharges identified, removed, or planned to be removed below.*

If/when we have illicit discharges to report, our illicit discharge removal reports will be posted on the website.

## **Employee Training**

Describe the frequency and the type of employee training conducted during the reporting period:

Each summer, the DPW interns are trained on illicit discharge detection. The engineering staff takes the engineering interns out to different outfalls to show them how to perform inspections. The engineering staff will take interns along to investigate any reported illicit discharges.

Training took place July-Aug 2019.

We are hopeful that the T2 center will develop programs that we can use for further training.

## **MCM4: Construction Site Stormwater Runoff Control**

*Below, report on the constructions site plan reviews, inspections, and enforcement actions completed during this reporting period.*

Number of site plan reviews completed:

Number of inspections completed:

Number of enforcement actions taken:

## **MCM5: Post-Construction Stormwater Management in New Development and Redevelopment**

### **Ordinance Development**

*Below, select the option that describes your ordinance or regulatory mechanism progress.*

- Bylaw, ordinance, or regulations are updated and adopted consistent with permit requirements
- Bylaw, ordinance, or regulations are updated consistent with permit requirements but are not yet adopted
- Bylaw, ordinance, or regulations have not been updated or adopted

Post-Construction requirements are included in the Town's development regulations. We are working to fine-tune them. We feel that inclusion in the Town's development regulations meets the intent of the permit objectives. However, a separate Stormwater and Land Development Management Ordinance has been drafted by the Department of Public Works.

### **As-Built Drawings**

Describe the status of the measures the MS4 has utilized to require the submission of as-built drawings and ensure the long term operation and maintenance of completed construction sites required to be complete in year 2 of the permit term:

The Town has historically required as-built drawings for new subdivisions that include a new road. We have started collecting as-built drawings for all site plans.

### **Street Design and Parking Lots Report**

Describe the status of the street design and parking lots assessment due in year 4 of the permit term, including any

planned or completed changes to local regulations and guidelines:

The street design and parking lots assessment due in year 4 of the permit term has not been started.

### **Green Infrastructure Report**

Describe the status of the green infrastructure report due in year 4 of the permit term, including the findings and progress towards making the practice allowable:

The green infrastructure report due in year 4 of the permit term has not been started.

### **Retrofit Properties Inventory**

Describe the status of the inventory, due in year 4 of the permit term, of permittee-owned properties that could be modified or retrofitted with BMP's to mitigate impervious areas and report any properties that have been modified or retrofitted:

The retrofit properties inventory due in year 4 of the permit term has not been started.

## **MCM6: Good Housekeeping**

### **Catch Basin Cleaning**

*Below, report on the number of catch basins inspected and cleaned, along with the total volume of material removed from the catch basins during this reporting period.*

Number of catch basins inspected:

50

Number of catch basins cleaned:

50

Total volume or mass of material removed from all catch basins:

174,363 lbs

*Below, report on the total number of catch basins in the MS4 system, if known.*

Total number of catch basins:

1,829

*If applicable:*

Report on the actions taken if a catch basin sump is more than 50% full during two consecutive routine inspections/cleaning events:

If sump is more than 50% full during two consecutive routine inspections/cleaning events, a note will be made and when it is time to rebuild or work on the road, adjustments will be made like re-digging the roadside ditches.

We had mechanical difficulties with the vaccon and it was out of commission for repairs for the fall. Our spring/summer cleaning was impacted due to COVID-19 as we had limited staffing and were only performing essential services.

### **Street Sweeping**

*Report on the street sweeping completed during the reporting period using one of the three metrics below.*

- Number of miles cleaned:
- Volume of material removed:
- Weight of material removed:

**O&M Procedures and Inventory of Permittee-Owned Properties**

*Below, check all that apply.*

The following permittee-owned properties have been inventoried:

- Parks and open spaces
- Buildings and facilities
- Vehicles and equipment

The following O&M procedures for permittee-owned properties have been completed:

- Parks and open spaces
- Buildings and facilities
- Vehicles and equipment

**Stormwater Pollution Prevention Plan (SWPPP)**

*Below, report on the number of site inspections for facilities that require a SWPPP completed during this reporting period.*

Number of site inspections completed:

Describe any corrective actions taken at a facility with a SWPPP:

**Additional Information**

**Monitoring or Study Results**

*Results from any other stormwater or receiving water quality monitoring or studies conducted during the reporting period not otherwise mentioned above, where the data is being used to inform permit compliance or permit effectiveness must be attached.*

- Not applicable
- The results from additional reports or studies are attached to the email submission.
- The results from additional reports or studies can be found at the following website(s):

If such monitoring studies were conducted on your behalf or if monitoring studies conducted by other entities were reported to you, a brief description of the type of information gathered or received shall be described below:

**Additional Information**

*Optional:* Enter any additional information relevant to your stormwater management program implementation during the

reporting period. Include any BMP modifications made by the MS4 if not already discussed above:

### **COVID-19 Impacts**

*Optional: If any of the above year 2 requirements could not be completed due to the impacts of COVID-19, please identify the requirement that could not be completed, any actions taken to attempt to complete the requirement, and reason the requirement could not be completed below:*

Due to COVID-19, the Goffstown DPW office was closed from March-July.

- We did not get our post-construction ordinance approved by the Select Board.
- We did not have interns and staffing is limited due to the shutdown, so no inspections were completed during the summer of 2020, this will impact both our year 2 and year 3 catchment/outfall/interconnection reporting. We will try our best to get some inspections completed this fall, but staffing continues to be limited. Due to the remote locations of a majority of the outfalls, for the inspectors safety, we require the buddy system for inspections. Similarly, these restrictions will reduce our catch basin cleaning efforts for our year 2 and year 3 reporting.
- No storm drains were stenciled May-July 2020.
- Our annual opportunity for public participation in review and implementation of SWMP will be limited to online viewing. Our SWMP is available 24/7/365 on our MS4 website and an email address has been set up to collect comments. This will continue until large public gatherings are allowed and our Department agrees that it is safe for our staff to attend.
- Due to COVID-19 we did not have formal opportunities for training as classes were cancelled and we were unable to meet in groups.

Unfortunately, given that COVID-19 is going to be around for an unknown amount of time, our department and inspection progress will likely be limited for the foreseeable future due to limited staffing.

### **Activities Planned for Next Reporting Period**

Please confirm that your SWMP has been, or will be, updated to comply with all applicable permit requirements including but not limited to the year 3 requirements summarized below. (Note: impaired waters and TMDL requirements are not listed below)

We will do our best given limited resources and staffing and heightened restrictions due to COVID-19 ☒

- Inspect all outfalls/ interconnections (excluding Problem and Excluded outfalls) for the presence of dry weather flow
- Complete follow-up ranking as dry weather screening becomes available

### **Annual Requirements**


- Annual report submitted and available to the public
- Annual opportunity for public participation in review and implementation of SWMP
- Keep records relating to the permit available for 5 years and make available to the public
- Properly store and dispose of catch basin cleanings and street sweepings so they do not discharge to receiving waters
- Annual training to employees involved in IDDE program
- Update inventory of all known locations where SSOs have discharged to the MS4 in the last 5 years
- Continue public education and outreach program
- Update outfall and interconnection inventory and priority ranking and include data collected in connection with the dry weather screening and other relevant inspections conducted
- Implement IDDE program

- Review site plans of construction sites as part of the construction stormwater runoff control program
- Conduct site inspection of construction sites as necessary
- Inspect and maintain stormwater treatment structures
- Log catch basins cleaned or inspected
- Sweep all uncurbed streets at least annually
- Continue investigations of catchments associated with Problem Outfalls
- Review inventory of all permittee owned facilities in the categories of parks and open space, buildings and facilities, and vehicles and equipment; update if necessary

## Part V: Certification of Small MS4 Annual Report 2020

### 40 CFR 144.32(d) 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, I certify that 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.

Name:	Adam Jacobs	Title:	Director of Public Works
Signature:		Date:	9/2/20

### **Annual Report Submission**

Please submit the form electronically via email to EPA by clicking on the link below or using the email address listed below. Please ensure that all required attachments are included in the email and not attached to this PDF.

EPA: [stormwater.reports@epa.gov](mailto:stormwater.reports@epa.gov)