

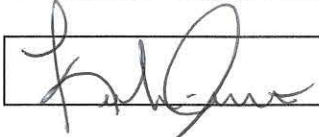
New Hampshire Small MS4 General Permit
Annual Report
LONDONDERRY
Permit Year 2

EPA NPDES Permit Number NHR041016

Certification

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Printed Name Kevin H. Smith, Town Manager

Signature  Date 9/25/2020

Primary MS4 Program Manager Contact Information:

Name: John R. Trottier, PE

Position/Title: Asst. Director of Public Works & Engineering
Londonderry, NH

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Small MS4 Authorization

The following annual report is intended to document on the activities undertaken over the reporting period from July 1, 2019 – June 30, 2020 in accordance with the Notice of Intent. NOI can be found at the following (document name or web address):

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

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

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

IDDE: The IDDE is included in the SWMP noted above.

MCM1 - Public Education and Outreach

Year 2 Activities

BMP 1A: Pet Waste Disposal (2 flyers)

Document Name and/or Web Address:

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

Description:

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

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

Targeted Audience:

Residents - Pet Owners

Measurable Goal(s):

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

Message Date: June 20, 2019 and ongoing. The number of flyers taken under Year 2 is 4 (number may have been reduced with the Town Hall closure from March-July due to COVID-19).

BMP 1B: Grass and Fertilizer (2 flyers)

Document Name and/or Web Address:

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

Description:

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

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

Targeted Audience:

Residential &/or Business and Institutions

Measurable Goal(s):

Number of flyers taken: Lawn care enthusiasts' residents understand the potential water quality impacts from fertilizer and improper disposal of grass clippings and are aware of the proper lawn care management techniques for reducing those impacts.

Message Date: June 20, 2019 and ongoing. The number of flyers taken under Year 2 is 7 (number may have been reduced with the Town Hall closure from March-July due to COVID-19).

BMP 1C: Get Pumped (Septic System Maintenance) brochure

Document Name and/or Web Address:

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

Description:

Distribute and promote brochure, directing to website to educate New Hampshire homeowners with septic systems on how to identify, locate and maintain those systems. 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):

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

Message Date: September 23, 2019 BMP placed on website and ongoing. The number of flyers taken under Year 2 is 3 (number may have been reduced with the Town Hall closure from March-July due to COVID-19).

BMP 1D: Rake It or Leave It

Document Name and/or Web Address:

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

Description:

Distribute and promote informational flyer 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 are aware of the water quality impacts of yard waste dumping near or in water bodies and safe alternatives for yard waste disposal.

Message Date: November 5, 2019 BMP placed on website and ongoing. The number of flyers taken under Year 2 is **0** (number may have been reduced with the Town Hall closure from March-July due to COVID-19).

BMP 1F: Developer/Construction Outreach (renamed from NOI)

Web Address:

<https://www.londonderrynh.org/public-works-engineering>

Description:

Review checklist with Developers and Construction Contractors prior to beginning of construction project (pre-construction) to identify responsible parties, erosion control practices, other best management practices, and requirements for EPA Construction General Permit as appropriate.

Targeted Audience:

Developer/Construction

Measurable Goal(s):

Contractors and Developers are aware of the need for proper erosion control practices during construction work.

The Department held a total of **15** pre-construction meetings for site development (13) and utility (2) construction projects. The site development projects represent 100% of projects that received prior board approval and began construction during this reporting period.

Message Date:

Ongoing.

BMP : Stormwater -What you can do as a Citizen

Document Name and/or Web Address:

“Stormwater- What you can do as a Citizen”

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

Description:

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

Targeted Audience:

Residents &/or Business and Institutions

Measurable Goal(s):

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

Message Date: June 2019 BMP and ongoing. The number of flyers taken under Year 2 is 1 (number may have been reduced with the Town Hall closure from March-July due to COVID-19).

MCM2 - Public Participation**Year 2 Activities****BMP 2A: Public Review of Stormwater Management Plan**

The Stormwater Management Program (SWMP) was revised in September 2019 and was available at the Town of Londonderry Department of Public Works and Engineering during normal business hours. Under year 2, the availability was reduced with the Town Hall closure (March-July) due to COVID-19. The SWMP will be updated soon to include the additional procedures developed under the Year 2 permit timetable. The updated SWMP will be available at the Town of Londonderry Department of Public Works and Engineering during normal business hours for review and is intended to be available on the Town's Stormwater website page upon completion of the year 2 updates.

BMP 2B: Public Participation in Stormwater Management Program

The SWMP is available at the Town of Londonderry Department of Public Works and Engineering during normal business hours for review and comment and is intended to be available on the Town's Stormwater website page upon completion of the year 2 updates.

BMP 2C: Annual Household Hazardous Waste & Monthly Used Oil Collection Events**Document Link or Reference:**

<https://www.londonderrynh.org/environmental-services-solid-waste>

Deliverables will progress in accordance with the accepted NOI and is scheduled for year 3.

Description:

Hold annual Household Hazardous Waste (HHW) Collection Event in November each year for the residents of Londonderry and Derry. The Town of Derry sponsored a separate event in June this year for residents of both towns. The event allows residents of each town to dispose of

household hazardous waste legally and properly from their home. The event is also used to spread outreach materials directly to residents. Outreach brochures promoting health and safety and HHW reduction include:

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

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

Targeted Audience: Residents

Measurable Goal(s):

Conducted Household Hazardous Waste Collection on Nov 23, 2019 and June 6, 2020.

Conducted Used Oil Collections on 10/5/19, 11/2/19, 11/23/19, 12/7/19, 3/7/20. Due to COVID-19, no further collections have occurred during the report period.

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

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

BMP 2E: Partnership – Advocacy Groups

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

BMP 2F: Partnership with NHDOT

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

BMP 2G: Cleanups – Roadside/General

“Beautify Londonderry” roadside cleanup program did not occur in 2020 due to COVID-19 restrictions during the report period.

MCM3 – Illicit Discharge Detection and Elimination

Year 2 Activities

BMP 3A: IDDE Legal Authority

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

BMP 3B: IDDE Program

A Written Draft IDDE plan was developed in September 2019.

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

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

- Number and percent of total outfall catchments served by the MS4 evaluated using the catchment investigation procedure: **0**
- Number of dry weather outfall observations for flow only: 485 (OBSERVED DRY) Year 1; 15 remaining (OBSERVED DRY) Year 2. All outfalls (500 per NOI) observed dry.
- Number of wet weather outfall inspections/sampling events: **0**
- Number of illicit discharges removed: **0** found.
- Estimated gallons of flow removed: **0**.

BMP 3C: Sanitary Sewer Overflow (SSO) Inventory

The Town of Londonderry does not have any SSOs.

Number of SSO's identified this year: **0**.

BMP 3D: Map of Storm Sewer System

Map of storm sewer system and associated outfalls is in progress in accordance with the accepted NOI but has not been completed at this time under year 2. Due to COVID-19 and the Town Hall closure (March-July), the Town did not hire staff/interns to conduct additional mapping during the spring of year 2. The mapping was not completed. The Town is still progressing, in accordance with the accepted NOI, to update and complete the mapping and incorporate into the current Town wide map in year 3.

BMP 3E: Dry Weather Screening/Sampling

Dry weather screening of remaining storm sewer system and associated outfalls was not completed in year 2 but was conducted in September 2020 in accordance with the accepted NOI.

The Town intends to use consultants to conduct the stormwater sampling at the outfall locations.

BMP 3F: Catchment Investigation

Catchment investigation of storm sewer system and associated outfalls was not conducted in year 2. Prior observations of dry conditions at outfalls and no observed evidence of illicit discharge indicated that further investigation was not necessary.

BMP 3G: Employee Training

Employee training in accordance with IDDE plan was not conducted in year 2. On June 17, 2020, City of Dover and UNH provided Illicit Discharge videos prepared by senior civil and environmental engineering students at the Seacoast Stormwater Coalition meeting. Training using these videos and information on how to identify illicit discharges and SSOs will be made available to applicable employees in accordance with IDDE plan. The training is intended to be implemented in year 3.

MCM4 – Construction Site Stormwater Runoff Control

Year 2 Activities

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

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

- Number of site plan reviews completed: 8
- Number of inspections: 646
- Number of enforcement actions: 0

MCM5 – Post Construction Stormwater Management in New Development and Redevelopment

Year 2 Activities

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

The Town has developed a general checklist of items required upon construction completion that is presented during preconstruction meetings, which includes project as-built plans of all on-site stormwater facilities. However, development and incorporation of the checklist into the

regulations was not completed in the year 2 reporting period due to COVID-19 (Town Hall closure from March-July 2020). The Town is still progressing to complete and incorporate the checklist into the current regulations in year 3.

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

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

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

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

BMP 5D: Street Design and Parking Lot Guidance Report (due in year 4)

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

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

The Town adopted a Stormwater Ordinance in September 2019 and was beginning to review and update the regulations to incorporate the Ordinance, but was not completed in the year 2 reporting period due to COVID-19 (Town Hall closure from March-July 2020). The Town is still progressing to complete and incorporate the Ordinance into the current regulations in year 3.

MCM6 – Good Housekeeping and Pollution Prevention for Permittee Owned Operations

Year 2 Activities

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

Inventories of the Permittee-Owned Parks and Open Spaces, Buildings and Facilities, and Vehicle and Equipment have been developed and drafts are incorporated into the associated draft BMPs noted below. However, the inventories were not completed within the year 2 permit reporting period due to COVID-19 (Town Hall closure from March-July 2020). The Town is still progressing to complete and incorporate the inventories into the BMPs in year 3.

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

An Operations and Maintenance procedure draft document for the Permittee-Owned Parks and Open Spaces with an inventory listing has been developed that is currently under review. However, the procedures were not completed within the year 2 permit reporting period due to COVID-19 (Town Hall closure from March-July 2020). The Town is still progressing to complete the document, incorporate the procedures in the SWMP and begin implementation of the procedures under year 3.

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

An Operations and Maintenance procedure draft document for the Building and Facilities with an inventory listing has been developed that is currently under review. However, the procedures were not completed within the year 2 permit reporting period due to COVID-19 (Town Hall closure from March-July 2020). The Town is still progressing to complete the document, incorporate the procedures in the SWMP and begin implementation of the procedures under year 3.

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

An Operations and Maintenance procedure draft document for the Vehicles and Equipment with an inventory listing has been developed that is currently under review. However, the procedures were not completed within the year 2 permit reporting period due to COVID-19 (Town Hall closure from March-July 2020). The Town is still progressing to complete the document, incorporate the procedures in the SWMP and begin implementation of the procedures under year 3.

BMP 6E: Catch Basin Cleaning Program

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

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

- Number of catch basins within MS4 regulated area: 2,500+/-
- Number catch basins inspected in accordance with the SWMP: 2,500+/-
- Number of catch basins cleaned: **1750**
- Volume of material removed: **300** +/- CY

A log form for the catch basin cleaning is currently being developed and was not completed in year 2. The Town is currently in the process of completing the form of implementation in year 3.

BMP 6F: Street Sweeping Program

A street sweeping program was not established in year 2 and is to be established such that all streets with curbing and/or catch basins and Town owned parking lots will be swept in accordance with permit conditions. The plan to conduct the street sweeping is currently under development. The Town is still progressing to complete the document, incorporate the procedures in the SWMP and begin implementation of the procedures under year 3.

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

- Number of (lane) miles swept: 0
- Volume of swept material: 0

BMP 6G: Stormwater Treatment Structures Inspection and Maintenance Procedures (due year 2)

An Inspection and Maintenance procedure draft document for the Stormwater Treatment Structures with an inventory listing has been developed that is currently under review. However, the procedures were not completed within the year 2 permit reporting period due to COVID-19 (Town Hall closure from March-July 2020). The Town is still progressing to complete the document, incorporate the procedures in the SWMP and begin implementation of the procedures under year 3.

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

BMP 6H: Winter Road Maintenance Program

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

BMP 6I: SWPPP (due year 2)

A SWPPP draft document has been developed for the DPW garage that is currently under review. A SWPPP for the drop-off center is currently being developed. However, the SWPPPs were not completed within the year 2 permit reporting period due to COVID-19 (Town Hall closure from March-July 2020). The Town is still progressing to complete the SWPPP documents, incorporate the procedures in the SWMP and begin implementation of the procedures under year 3.

Copies are kept, and inspections as outlined in completed SWPPPs will begin in year 3.

TMDL's and Water Quality Limited Waters

Bacteria/Pathogens

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

Chloride

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

Londonderry through its participation in the Lower Merrimack Valley Stormwater Coalition and continued involvement with the NHDES led Green Snow Pro Program are working to develop a public education program regarding impacts of salt use, methods to reduce salt use on private property, modifications to driving behavior in winter weather as listed in Attachment 1 to Appendix H.

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

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

Description of any changes in identified BMPs or measurable goals

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

- Londonderry has provided two additional Public Education and outreach flyers for year 2 with one for Septic System Maintenance and the other for Yard Care Waste under MCM-1. The number of flyers taken under Year 2 is reduced with the Town Hall closure (March-July) due to COVID-19. The Year 1 Pet Waste, Lawn Care and Flyer relative to Stormwater and citizen participation are also available. The seven flyers under MCM 1 are located on the Town's Stormwater webpage and available at the Town Hall as noted under MCM 1 above.
- BMP1F has been renamed in this annual report to take into account the outreach information provided to developers and contractors during preconstruction meetings conducted by the Town including a checklist noting as-built plans and erosion control measures consistent with the intent of MCM 1. The number of preconstruction meetings conducted in the report period has been noted. The SWMP will be reviewed and updated to clarify this BMP change.
- A revised SWMP dated September 2019 was developed during the year 2 reporting period. The revised SWMP has been available at the Department of Public Works for public review and comment per the NOI (MCM 2).
- An IDDE program was completed during the year 2 reporting period with the adoption of the

legal authority portion of the program in September 2019 during the current report period. (MCM 3).

- The Town adopted a Stormwater Ordinance on September 16, 2019 to provide legal authority for the IDDE program which has been incorporated into the IDDE program. (MCM 3)
- Updates to the Town regulations relative to construction stormwater runoff under BMPS 4A-4C were not developed during the reporting period due to COVID-19 and the Town Hall closure (March-July). The Town is still progressing to complete the updates to the regulations and incorporate the recently adopted Stormwater Ordinance into the regulations (MCM 4).
- A post construction checklist has been developed but updates to the Town regulations relative to as-built plans for stormwater facilities under BMP 5A were not developed during the reporting period due to COVID-19 and the Town Hall closure (March-July). The Town is still progressing to complete the updates to the regulations and incorporate the checklist and recently adopted Stormwater Ordinance into the regulations (MCM 5).
- The Town has conducted catch basin inspection and cleaning, as needed, of all catch basins located in the MS4 area during the reporting period. The development of a form to log the catch basins cleaned and inspected including volume of material removed was delayed due to COVID-19. The Town is still progressing in development of a form to log the catch basins cleaned. (BMP 6E).
- The development of a street sweeping program did not occur during the reporting period and was delayed. The Town historically has not had issues/concerns with sediment and currently does not conduct this specific activity town wide. The Town is still progressing and is currently developing a draft street sweeping program as noted in the NOI application (BMP 6F).
- The salt reduction plan data of the Town's Beaver Brook Watershed Salt Reduction Plan was updated within the reporting period on July 26, 2019.

Activities for the Next Reporting Cycle

LONDONDERRY will continue to implement activities in accordance with the approved Notice of Intent (NOI).