

**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 Permit Number:

**Primary MS4 Program Manager Contact Information**

Name:  Title:

Street Address Line 1:

Street Address Line 2:

City:  State:  Zip Code:

Email:  Phone Number:

**Stormwater Management Program (SWMP) Information**

SWMP Location (web address):

Date SWMP was Last Updated:

If the SWMP is not available on the web please provide the physical address:

## Part II: Self-Assessment

First, in the box below, select the impairment(s) and/or TMDL(s) that are applicable to your MS4. Make sure you are referring to the most recent EPA approved Section 303(d) Impaired Waters List which can be found here: <https://www.epa.gov/tmdl/region-1-impaired-waters-and-303d-lists-state>

**Impairment(s)**

Bacteria/Pathogens     
  Chloride     
  Nitrogen     
  Phosphorus  
 Solids/ Oil/ Grease (Hydrocarbons)/ Metals

**TMDL(s)**

Bacteria and Pathogen     
  Chloride     
  Lake and Pond Phosphorus

Clear Impairments and TMDLs

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 a 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 and complied with State Public Notice requirements
- 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 stored and disposed of catch basin cleanings and street sweepings so they did not discharge to receiving waters
- Provided training to employees involved in IDDE program within the reporting period
- All curbed roadways were swept at least once within the reporting period
- Updated outfall and interconnection inventory and priority ranking as needed

*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 annual 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:

**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:

Unlike previous years, public educational materials were not provided to residents at our facilities this year due to Covid-19 restrictions. Instead, the materials were mailed to targeted residents around Cobbett's Pond.

Additionally, all public education materials have been posted on our Town Website.

<https://windhamnh.gov/450/Stormwater-Management>

**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:

**Phosphorus Impairment**

Annual Requirements

*Public Education and Outreach\**

- Distributed an annual message in the spring (April/May) encouraging the proper use and disposal of grass clippings and encouraging the proper use of slow-release and phosphorus-free 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 BMPs*

- Any structural BMPs already existing or installed in the regulated area by the permittee or its agents was tracked and the phosphorus removal by the BMP was estimated consistent with Attachment 3 to Appendix F. The BMP type, total area treated by the BMP, the design storage volume of the BMP and the estimated phosphorus 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:

SWMP street sweeping requirements have been reviewed and the Town is in the process of identifying streets for increased street sweeping.

Potential structural BMPs are being identified and mapped

**Solids, Oil and Grease (Hydrocarbons), or Metals Impairment(s)**

Annual Requirements

*Good Housekeeping and Pollution Prevention for Permittee Owned Operations*

- Increased 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:

SWMP street sweeping requirements have been reviewed and the Town is in the process of identifying streets for increased street sweeping.

*Optional:* Use the box below to provide any additional information you would like to share as part of your self-assessment:

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

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

- Yes
- No

If yes, describe below, including any relevant impairments or TMDLs:

## 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 this reporting period:**

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

#### **BMP: Yard Waste - Leaf Litter**

Message Description and Distribution Method:

Unlike previous years, public educational materials were not provided to residents at our facilities this year due to Covid-19 restrictions. Instead, the materials were mailed to targeted residents around Cobbett's Pond as well as being posted on the Stormwater page of the Town Website.

The brochure and letter can be viewed at the following links:

<https://www.windhamnh.gov/DocumentCenter/View/7236/Stormwater-Brochure-Letter>

<https://windhamnh.gov/DocumentCenter/View/7096/Yard-Waste-Brochure>

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

The brochure was posted on the Town Website available to all residents.

Message Date(s):

Message Completed for: Appendix F Requirements  Appendix H Requirements

Was this message different than what was proposed in your NOI? Yes  No

If yes, describe why the change was made:

#### **BMP: Stormwater Brochure for Residents**

Message Description and Distribution Method:

A guide for residents that includes information on stormwater, car washing, pool draining, septic system maintenance, pet waste disposal, and lawn chemical use. The brochure has been posted on the Town Website and can be viewed at the following link:

<https://windhamnh.gov/DocumentCenter/View/7151/Residents-Brochure>

Targeted Audience: Residents

Responsible Department/Parties: Community Development Staff and Transfer Station Staff

Measurable Goal(s):

The brochure was posted on the Town Website.

Message Date(s): April 7, 2020

Message Completed for: Appendix F Requirements  Appendix H Requirements

Was this message different than what was proposed in your NOI? Yes  No

If yes, describe why the change was made:

**BMP: Stormwater Brochure for Businesses**

Message Description and Distribution Method:

A guide for businesses that includes information on building maintenance, lawn chemical use, filtration benefits, pool draining, car washing, ice prevention, material storage and disposal. The brochure has been posted on the Town Website and can be viewed at the following link:

<https://windhamnh.gov/DocumentCenter/View/7136/Business-Brochure>

Targeted Audience: Businesses, institutions and commercial facilities

Responsible Department/Parties: Community Development Staff and Transfer Station Staff

Measurable Goal(s):

The brochure was posted on the Town Website.

Message Date(s): April 7, 2020

Message Completed for: Appendix F Requirements  Appendix H Requirements

Was this message different than what was proposed in your NOI? Yes  No

If yes, describe why the change was made:



**BMP: Stormwater Brochures for Developers**

## Message Description and Distribution Method:

A guide for developers that includes information on stormwater, low-impact development, General Permit, and sediment and erosion control management. The brochure has been posted on the Town Website and can be viewed at the following link:

<https://windhamnh.gov/DocumentCenter/View/7152/Developers-Brochure>

Targeted Audience: Developers (construction)

Responsible Department/Parties: Community Development Staff and Transfer Station Staff

## Measurable Goal(s):

The brochure was posted on the Town Website.

Message Date(s): April 7, 2020

Message Completed for: Appendix F Requirements  Appendix H Requirements

Was this message different than what was proposed in your NOI? Yes  No

If yes, describe why the change was made:

**BMP: Stormwater Brochure for Industrial**

## Message Description and Distribution Method:

A guide for industrial facilities that includes information on ice prevention, industrial material storage, infiltration benefits, equipment inspection and maintenance, and waste management and disposal. The brochure has been posted on the Town Website and can be viewed at the following link:

<https://windhamnh.gov/DocumentCenter/View/7137/Industrial-Brochure>

Targeted Audience: Industrial facilities

Responsible Department/Parties: Community Development Staff and Transfer Station Staff

## Measurable Goal(s):

The brochure was posted on the Town Website.

Message Date(s): April 7, 2020

Message Completed for: Appendix F Requirements  Appendix H Requirements

Was this message different than what was proposed in your NOI? Yes  No

If yes, describe why the change was made:

### **BMP: Pick Up After Your Pet**

Message Description and Distribution Method:

Unlike previous years, public educational materials were not provided to residents at our facilities this year due to Covid-19 restrictions. Instead, the materials were mailed to targeted residents around Cobbett's Pond as well as being posted on the Stormwater page of the Town Website.

The brochure and letter can be viewed at the following link:

<https://www.windhamnh.gov/DocumentCenter/View/7236/Stormwater-Brochure-Letter>  
<https://windhamnh.gov/DocumentCenter/View/7129/Pet-Waste-Disposal-Brochure>

Targeted Audience: Residents

Responsible Department/Parties: Community Development Staff and Transfer Station Staff

Measurable Goal(s):

The brochure was posted on the Town Website.

Message Date(s): April 7, 2020

Message Completed for: Appendix F Requirements  Appendix H Requirements

Was this message different than what was proposed in your NOI? Yes  No

If yes, describe why the change was made:

### **BMP: Green Grass & Clear Water**

Message Description and Distribution Method:

Unlike previous years, public educational materials were not provided to residents at our facilities this year due to Covid-19 restrictions. Instead, the materials were mailed to targeted residents around Cobbett's Pond as well as being posted on the Stormwater page of the Town Website.

The brochure and letter can be viewed at the following link:

<https://www.windhamnh.gov/DocumentCenter/View/7236/Stormwater-Brochure-Letter>  
<https://windhamnh.gov/DocumentCenter/View/7079/Grass-and-Fertilizer-Brochure>

Targeted Audience: Residents

Responsible Department/Parties: Community Development Staff and Transfer Station Staff

Measurable Goal(s):

The brochure was posted on the Town Website.

Message Date(s): April 7, 2020

Message Completed for: Appendix F Requirements  Appendix H Requirements

Was this message different than what was proposed in your NOI? Yes  No

If yes, describe why the change was made:

**BMP:[Message name here]**

Message Description and Distribution Method:

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

Message Date(s):

Message Completed for: Appendix F Requirements  Appendix H Requirements

Was this message different than what was proposed in your NOI? Yes  No

If yes, describe why the change was made:

Add an Educational Message

## MCM2: Public Participation

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

The Stormwater Committee discussed the development of the SWMP at several committee meetings which are open to the public.

In addition, we maintain a Town Website page on Stormwater which urges residents to get involved and we post our meeting minutes as well as documents related to the SWMP and other Stormwater related matters.

A public involvement letter was posted on the Website:

<https://windhamnh.gov/DocumentCenter/View/7089/Public-Update-Memo-May-2020>

Was this opportunity different than what was proposed in your NOI?    Yes     No

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

In addition to above, the Planning Board developed a Post-Construction ordinance that was posted in the paper for comment and was approved at a public meeting.

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

### Sanitary Sewer Overflows (SSOs)

*Check off the box below if the statement is true.*

This SSO section is NOT applicable because we DO NOT have sanitary sewer

*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:

### 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:

Open channel conveyances are in the process of being mapped, but were not completed by the end of the reporting period.

### **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:

*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:

### **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:

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

Number of catchment investigations completed 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:*

Most outfall visits resulted in dry outfalls. 2 of the outfalls had dry weather flow and are scheduled to be revisited and screened during the current permit term.

**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 the 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:

*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:  gallons/day

*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 (July 1, 2018).***

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:

No illicit discharges were identified during this Year 2 of the permit. The 5 identified above occurred during Year 1 of the permit.

**Employee Training**

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

The Town conducted employee training of the Stormwater Committee members on the development of the IDDE and SWMP to ensure the employees understood their responsibilities regarding the two new documents. The committee met several times during this reporting period over conference call. During these meetings knowledge was provided to the group as to the overall Stormwater program.

Additionally, committee members attended several monthly meetings of the Nashua-Manchester Regional Stormwater Coalition via in-person and by remote Town meeting.

### MCM4: Construction Site Stormwater Runoff Control

Below, report on the construction 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:

*Optional:* Enter any additional information relevant to construction site plan reviews, inspections, and enforcement actions:

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

#### Ordinance or Regulatory Mechanism

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

#### As-built Drawings

Describe the measures the MS4 has utilized to require the submission of as-built drawings and ensure long term operation and maintenance of completed construction sites:

The as-built submission requirement was recently changed in the regulation and the Team is beginning to set up systems to use the information to ensure appropriate long-term O&M of completed construction sites.

**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:

No action has been taken on this measure during the reporting period.

**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 development of this has not been started during this reporting period.

**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 BMPs to mitigate impervious areas and report on any properties that have been modified or retrofitted:

The development of this has not been started during this reporting period.

**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:

Number of catch basins cleaned:

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

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

Total number of catch basins:

*If applicable:*



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

### **Street Sweeping**

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

- Number of miles cleaned:
- Volume of material removed:  cubic yards
- Weight of material removed:  [Select Units]

### **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:

No corrective actions were identified to be required for either the Transfer Station or the Highway Garage.

### 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 or studies were conducted on your behalf or if monitoring or 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:

Under MCM5, we noted the By-Law was adopted but final approve by Planning Board occurred on July 1, 2020, one day after the permit Year.

#### **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:

As stated in the document, public educational materials were not provided to residents at our facilities this year due to Covid-19 restrictions. Instead, the materials were mailed to targeted residents around Cobbett's Pond and posted on the Town Website.

**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)

Yes, I agree

- 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

Provide any additional details on activities planned for permit year 3 below:

## 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:  Title:

Signature:  Digitally signed by David Sullivan  
Date: 2020.09.03 15:31:11 -04'00' Date:

*[Signatory may be a duly authorized representative]*

*Note: When prompted during signing, save the document under a new file name.*

### Annual Report Submission

*Please submit the form electronically via email to EPA by clicking on one of the links 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)

### Paper Signature:

*If you did not sign electronically above, you can print the signature page by clicking the button below.*

*Optional: If you did not sign electronically above, you may lock the form by clicking the "Lock Form" button below which will prompt you to save the locked version of the form. Save this locked version under a new file name.*