

**New Hampshire Small MS4 General
Permit**

Annual Report

Town of Exeter

Permit Year 3

Reporting Period: July 1, 2020 to June 30, 2021

EPA NPDES Permit Number: NHR041007

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	Russell Dean
Title	Town Manager
Signature	
Date	9/28/2021

Contact Information

Primary MS4 Program Manager Contact Information:

Name: Jennifer Mates, PE

Title: Assistant Town Engineer

Department: Public Works

Street Address: 13 Newfields Road
Exeter NH 03833

Email: jmates@exeternh.gov

Phone Number: (603) 418-6431

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Small MS4 Authorization

The following annual report, which serves as a self assessment, is intended to document on the activities undertaken over the **reporting period from July 1, 2020 through June 30, 2021** in accordance with the Notice of Intent (NOI). The NOI can be found at the following website:

<https://www3.epa.gov/region1/npdes/stormwater/nh/tms4noi/exeter.pdf>

Compliance activities have been identified and described in the Town of Exeter's Stormwater Management Program (SWMP) and Illicit Discharge Detection and Elimination (IDDE) Plan. These documents can be found at the following website or physical location and will be referred to throughout this report:

SWMP:

https://www.exeternh.gov/sites/default/files/fileattachments/public_works/page/38331/2019.06_exeternh_swmp.pdf

IDDE Plan: Located at the Exeter Public Works Department – 13 Newfields Road

MCM 1 - PUBLIC EDUCATION AND OUTREACH

BMP 1: Pet Waste Brochures/Pamphlets

Document Name and/or Web Address:

"Every Drop" postcards or flyer <https://stateofourestuaries.org/everydrop/every-drop-matters/for-towns/>

"Every Drop" pledge <https://stateofourestuaries.org/everydrop/petpledge/>

See Attachment for Facebook Post "Lifetime Post Total Reach"

See Attachment for Additional Public Participation

Description:

Distribution and promotion of "Every Drop" postcards or flyers with proper pet waste management, impacts of improper management, pet waste ordinance, and disposal requirements messaging. May include a pledge to pick up pet waste to be made available during dog registration and other events or venues (veterinarians, dog training, groomers, etc.). Every Drop is a collaborative education effort with Piscataqua Region Estuaries Partnership (PREP), New Hampshire Department of Environmental Services (NHDES), and other partners.

In Permit Year 3, the Town continued to use the same "Every Drop" flyer as in Permit Year 1. Flyers were made available at the Town Clerk and Public Works Department offices. Pet waste education and outreach information was posted on the Public Works Department Facebook page with a link to the Think Blue Exeter website, which includes the Every Drop flyer and pledge. A "Think Blue: Pet Waste" poster, which included the "Every Drop" QR code and website, was displayed at the regional Household Hazardous (HHW) Collection event to be viewed by the people waiting to drop off their waste. There were 168 households from Exeter who attended the HHW event and are assumed to have seen the poster. See Attachment for Additional Public Participation for a copy of the Pet Waste poster displayed at the HHW event. There were no "Every Drop" pledges received for Exeter in Permit Year 3. As an additional method to assess the measurable goal, the "Lifetime Post Total Reach" for social media posts in Permit Year 3 related to BMP 1 were tallied. The one Pet Waste posts had a "Lifetime Post Total Reach" of 390.

Targeted Audience:

Residents, businesses, institutions, and commercial facilities

Measurable Goal(s):

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. For additional information, refer to: https://www4.des.state.nh.us/nh-ms4/?page_id=54, "Minimum Control Measure 1: Public Outreach and Education".

Message Date:

Annually in spring and throughout the permit year

BMP 2: Clean Water/Healthy Lawns Brochures/Pamphlets

Document Name and/or Web Address:

5 Easy Steps “Healthy Lawns – Clean Water”: <https://www.exeternh.gov/bcc/exeters-healthy-lawns-clean-water-initiative>

Facebook Page: <https://www.facebook.com/exeterhealthylawnscleanwater/>

See Attachment for Facebook Post “Lifetime Post Total Reach”

Description:

Distribute Clean Water/Healthy Lawns information. The following is a summary of Healthy Lawns Clean Water efforts in Permit Year 3:

- Healthy Lawns Clean Water magnets were made available at the Town Clerk’s office. Approximately 100 were picked up by residents.
- Healthy Lawns Clean Water program sold 51 rain barrels to 35 distinct households. A Healthy Lawns Clean Water magnet was provided to each household with their rain barrel purchase. This is an increase in household reach from 9 in the previous year.
- The Healthy Lawns Clean Water Facebook page has 158 followers as of September of 2021.
- The Healthy Lawns Clean Water Facebook page continued to post new content. The Town created four unique posts on the Healthy Lawns Clean Water Facebook page with an average reach of 15.5.
- Content from the Healthy Lawns Clean Water Facebook page was shared to the Public Works Department Facebook page.

The Town continued engagement on social media and continued interest in rain barrels through sales. As a method to assess the measurable goal, the “Lifetime Post Total Reach” for social media posts in Permit Year 3 related to BMP 2 were tallied. The 39 Healthy Lawns Clean Water posts had a “Lifetime Post Total Reach” of 12,317.

Targeted Audience:

Residents, businesses, institutions, and commercial facilities

Measurable Goal(s):

To see an increased awareness of proper fertilizer use.

Message Date:

Annually in the spring

BMP 3: Development Regulations Fact Sheet Brochures/Pamphlets

Document Name and/or Web Address:

https://www.exeternh.gov/sites/default/files/fileattachments/planning_board/page/14051/withcover2019_for_spr_app.pdf

Description:

Distribute Regulations Fact Sheet to developers when they inquire about new land development projects. In Permit Year 2, the Town decided to rely on the checklist in the Planning Board applications for outreach to developers rather than distributing a separate regulations fact sheet. This approach was discussed and reviewed with NHDES. There were 16 Planning Board applications submitted during Permit Year 2. **This BMP has been achieved.**

Targeted Audience:

Developers

Measurable Goal(s): To see an increased awareness of the local, state, and federal stormwater regulations.

Message Date:

Permit Year 2

BMP 4: Advertise Green SnoPro Certification Website

Document Name and/or Web Address: <https://www.exeternh.gov/publicworks/road-treatment-and-snow-removal>

<https://www.des.nh.gov/land/roads/road-salt-reduction>

See Attachment for BMP 8

See Attachment for Facebook Post “Lifetime Post Total Reach”

Description:

Advertise Green SnowPro Certification webpage to increase participation in program. The Green SnowPro Certification was advertised on the Public Works Department “Road Treatment and Snow Removal” webpage under “Road Salt Reduction Program”. The webpage provided a link to the NHDES Road Salt Reduction program website, which has a link to the Green SnowPro Certification webpage. Green SnowPro flyers were also provided with the industrial site education to 17 businesses.

The Exeter Conservation Commission also promoted the Green SnowPro certification through a post on their Facebook page on December 18, 2020. The post referenced how being Green SnowPro certified provides staff training on salt reduction techniques that protect water quality from excess chloride, and encouraged local businesses to seek Green SnowPro certified contractors. As a method to assess the measurable goal, the “Lifetime Post Total Reach” for the social media post in Permit Year 3 related to BMP 4 was tallied. The one post had a “Lifetime Post Total Reach” of 137. **This BMP has been achieved.**

Targeted Audience:

Industrial, commercial, and institutional facilities

Measurable Goal(s):

To see an increased number of facilities with Green SnowPro winter staff or contractors at facilities.

Message Date:

Permit Year 3

BMP 5: Septic Smart Displays/Posters/Kiosks

Document Name and/or Web Address:

Think Blue Exeter: <https://www.exeternh.gov/bcc/think-blue-septic-system-maintenance>

Get Pumped Brochure: <https://www4.des.state.nh.us/nh-ms4/wp-content/uploads/2019/04/get-pumped-community-brochure-final.pdf>

See Attachment for BMP 5

See Attachment for Facebook Post “Lifetime Post Total Reach”

See Attachment for Additional Public Participation

Description:

Utilize Septic Smart posters to encourage residents to inspect and maintain their septic systems each year. In Permit Year 3, the Septic Smart posters were displayed at the Town Office and Exeter Public Library for the week of September 15, 2020 to promote Septic Smart Week. Additionally, the Town posted information during Septic Smart week on the Public Works Department and Conservation Commission Facebook pages, and the Think Blue Exeter website includes a septic system maintenance page with similar information. A Septic Smart poster was also displayed at the regional HHW Collection event to be viewed by the people waiting to drop off their waste. There were 168 households from Exeter who attended the HHW event and are assumed to have seen the poster. See Attachment for Additional Public Participation for a copy of the Septic Smart poster displayed at the HHW event.

Approximately 1,000 “Get Pumped” brochures were mailed to properties with septic systems in Exeter in June of 2021. The brochure was included with a cover letter from the Public Works Department and the Exeter-Squamscott River Local Advisory Committee encouraging homeowners to follow the guidelines outlined in the brochure. Three people called the Assistant Town Engineer with follow-up questions. As a method to assess the measurable goal, the “Lifetime Post Total Reach” for social media posts in Permit Year 3 related to BMP 5 were tallied. The seven Septic System posts had a “Lifetime Post Total Reach” of 1,400.

Targeted Audience:

Residents with septic systems

Measurable Goal(s):

To see an increase in septic system testing/maintenance.

Message Date:

Annually in the fall during Septic Smart week.

BMP 6: Leaf and Yard Waste Collection

Document Name and/or Web Address:

See Attachment for Facebook Post “Lifetime Post Total Reach”

See Attachment for Additional Public Participation

Description:

Post notices of leaf and yard waste collection. In Permit Year 3, notices were posted on the town’s website, social media, and the local paper. There has been no apparent increase in the disposal of leaf and yard waste observed at the transfer station. As a method to assess the measurable goal, the “Lifetime Post Total Reach” for social media posts in Permit Year 3 related to BMP 6 were tallied. The 10 Leaf/Yard Waste posts had a “Lifetime Post Total Reach” of 3,657

A poster was also displayed at the regional HHW Collection event to be viewed by the people waiting to drop off their waste. There were 168 households from Exeter who attended the HHW event and are assumed to have seen the poster. See Attachment for Additional Public Participation for a copy of the “Rake It or Leave It?” poster displayed at the HHW event. The poster provided information on the importance of proper disposal of leaf and yard waste and also included a notice regarding Exeter Fall Leaf Pick-up.

Targeted Audience:

Residents, businesses, institutions, and commercial facilities

Measurable Goal(s):

To see an increase in the disposal of leaf and yard waste at the transfer station.

Message Date:

Annually in the spring and fall

BMP 7: Exeter Conservation Commission’s Guest Speaker Night

BMP will progress in accordance with the accepted NOI and is scheduled for Permit Year 4.

BMP 8: Stormwater Pollution Prevention for Industrial Sites Flyer

Document Name and/or Web Address:

See Attachment for BMP 8

Description:

Distribute a Stormwater Pollution Prevention for Industrial Sites flyer by mail to industrial facilities. During Permit 3, industrial site education materials, including Green SnowPro and stormwater pollution control flyers, were sent to 17 industrial businesses.

This BMP has been achieved.

Targeted Audience:

Industrial facilities

Measurable Goal(s): To see an increase in awareness of stormwater pollution prevention practices at industrial facilities.

Message Date: Permit Year 5

Additional Public Education and Outreach

The Exeter Conservation Commission Facebook page has 996 followers as of September of 2021, with an average reach of 260. The Conservation Commission had 160 posts relevant to MS4, including CC/CC Partner Event (37), Clean Ups (2), Energy Efficiency (8), Sea Level Rise/Flooding (3), Lawn Reduction/Native Plantings (31), Rain Barrels (3), Fertilizer/Salt Reduction (3), Rain Barrels (3), Septic (4), Tree Planting (5), Waste Reduction (5), and Yard Waste (2).

The Town aired several water quality/pollution prevention themed Public Service Announcements, including Septic Smart videos, which support BMP 5, on local access cable (Channel 98 and 22) in between programming on a rotating slideshow. It is estimated each of the titles below played at least 100-500 times during Permit Year 3:

- Don't Overload Your Commode
- Don't Strain Your Drain
- Shield Your Field
- Think at the Sink
- Instream Flow

Exeter TV also has several water quality/pollution Public Service Announcements and NHDES videos that can be viewed on-demand on the Exeter TV website:

PSAs: https://videoplayer.telvue.com/player/LyAOBTaTsnn_CnwjwcB5-VoxQtyoKR1P/playlists/7852/media/397540?sequenceNumber=1&autoplay=false&showtabssearch=true

NHDES Videos: https://videoplayer.telvue.com/player/LyAOBTaTsnn_CnwjwcB5-VoxQtyoKR1P/series/3362/media/397540?sequenceNumber=1&autoplay=false&showtabssearch=true

MCM 2 - PUBLIC PARTICIPATION

BMP 9: Public Review of Stormwater Management Program (SWMP)

The Town of Exeter's Stormwater Management Program (SWMP) is available to the public for review on the Town's website or at the Public Works Department office during regular business hours. Documents and records relating to the SWMP are retained and available to the public for five years at the Exeter Public Works Department.

BMP 10: Public Participation in SWMP Development

The public is encouraged to submit written comments on the SWMP. Instructions on how to do this (email address provided of where to submit comments) are included on the

Town's Stormwater website (<https://www.exeternh.gov/publicworks/stormwater>). No comments were received in Permit Year 3.

BMP 11: Shoreline/Waterbody

The Conservation Commission advertised the opportunity for residents to participate in a statewide clean-up program. The Great NE Clean-Up hosted by Nature Groupie. A group of 17 volunteers participated locally. Trash clean-up was logged through the app Litterati. Two of the Exeter volunteers were the top contributors on April 18, 2021. They cleaned up trash at the Industrial Drive trail area (along Norris Brook), the roadside from Brickyard Pond to Hobart Street, and Powder Mill Rd along the Exeter River. Trash bags, gloves, and vests were available at the Public Works Department office, and collected trash could be disposed of at the transfer station or collected by Public Works Department staff.

The Planning Department organized a clean-up at the Morrissette property, a 30-acre riverside conservation parcel. An uncounted number of volunteers collected trash. Public Works Department staff collected the bags of trash and larger items for disposal.

Additional Public Participation

A regional Household Hazardous Waste (HHW) Collection event was held at the Exeter Public Works Garage on October 17, 2020, with participation for Exeter of 168 households. Posters were displayed at the HHW Collection event to promote BMP 1 (Pet Waste Brochures/Pamphlets), BMP 5 (Septic Smart Displays/Posters/Kiosks), and BMP 6 (Leaf and Yard Waste Collection). See Attachment for Additional Public Participation for a report on the HHW Collection event as well as the posters to promote BMPs 1, 5, and 6.

MCM 3 – ILLICIT DISCHARGE DETECTION AND ELIMINATION

BMP 12: Sanitary Sewer Overflow (SSO) Inventory

The SSO inventory has been updated. In Permit Year 3, there was one SSO identified and cleaned up/removed on December 17, 2020, which was reported to EPA and other government agencies, as required. The list of SSOs is available at:

<https://www.exeternh.gov/publicworks/combined-sewer-sanitary-sewer-overflows>.

BMP 13: Storm Sewer System Map

Phase 1 mapping of all known stormwater infrastructure has been completed in accordance with the accepted NOI. The map is continually updated as new information is available, and is in progress in accordance with the accepted NOI.

BMP 14: Written IDDE Program Development

A written IDDE plan has been developed. **The BMP is considered complete.**

BMP 15: Implement IDDE Program

The Town hired a consultant (Wright-Pierce) to update the initial outfall inventory and priority ranking included in the IDDE Plan. The primary update was to ensure all outfalls discharging to impaired waters were ranked as either “problem” or “high” priority. To accomplish this, receiving waterbody identifications were added to the initial outfall inventory and priority ranking. This resulted in 23 outfalls changing ranking to “high” priority. No catchment investigations were conducted during Permit Year 3.

No illicit discharges were identified or reported during Permit Year 3. As noted in Permit Year 2, an overflow pipe at a private sewer pump station that discharges to a private ditch was discovered. The Sewer Department worked with the owners to get the problem corrected. The overflow pipe was capped inside of the pump station.

BMP 16: Implement Employee Training

An IDDE training was held on September 22, 2020 at the Dover DPW Complex. The training was for the Town of Exeter Water & Sewer and Highway Department managers and foremen, and hosted by UNH and City of Dover. Training records are included in Appendix G of the IDDE Plan. A video addressing the issues associated with stormwater, common pollutants of concern, how to identify an illicit discharge, and general IDDE sampling protocols is being prepared by NHDES. The video is anticipated to be finalized and available to permittees in Permit Year 4.

BMP 17: Conduct Dry Weather Screening

During Permit Year 3, the Town hired a consultant (Geosyntec) to perform dry weather outfall sampling between October 5, 2020 and October 9, 2020. In addition, two outfalls were sampled by another consultant (Hoyle Tanner) as part of a construction project on September 1, 2020 and December 3, 2020. The following is a summary of the screening/sampling:

- Number of dry weather outfalls/interconnections screened during Permit Year 3: 24
- Percentage of total outfalls/interconnections screened to date: 86%
- Number of dry weather samples collected and analyzed during Permit Year 3: 9
- The sampling results are attached to the annual report.
- The updated inventory and ranking of outfalls/interconnections is attached to the annual report.

As shown in the sampling results for the October of 2020 sampling, some of the outfalls had parameters that exceeded some of the benchmark values; however, the results were not indicative of an illicit discharge with a sewage input. Additional dry weather screening may be conducted at these locations during future catchment investigations, if deemed necessary. As shown in the sampling results for the September and December of 2020 sampling conducted as part of a construction project, some of the parameters were detected; however, the results were not indicative of an illicit discharge with a sewage input.

As part of the update to the initial outfall inventory and priority ranking (described under BMP 15), a third party review of the outfall sampling program was conducted, which identified several outfalls were missed in the initial round of screening: 18 outfalls were not screened, 9 outfalls were flowing during dry weather and not reinspected, and 7 outfalls were inspected during dry weather, were not flowing, but showed indicators of a potential non-stormwater discharge (i.e. odor, color, turbidity, floatables, oil sheen, etc.). The 18 outfalls not initially inspected will be inspected during the remaining portion of fiscal year 2021 (October of 2021). The other outfalls will be prioritized for reinspection during fiscal year 2022, which includes the second half of Permit Year 4 and the first half of Permit Year 5.

BMP 18: Conduct Wet Weather Screening

No wet weather screening was conducted in Permit Year 3. Wet weather screening will progress in accordance with the accepted NOI and is scheduled to begin in Permit Year 4.

BMP 19: Ongoing Screening

Ongoing screening will progress in accordance with the accepted NOI (upon completion of catchment investigations and illicit discharge removal and confirmation).

BMP 20: IDDE Regulations

The existing Storm Drainage Ordinance prevents illegal discharges to the drainage system, with fines. The ordinance has been reviewed and did not require modification for compliance with the 2017 NH Small MS4 General Permit. **This BMP has been achieved.**

MCM 4 – CONSTRUCTION SITE STORMWATER RUNOFF CONTROL

BMP 21: Sediment and Erosion Control Ordinance

The Town of Exeter will rely on the Site Plan Review and Subdivision Regulations as a regulatory mechanism to require the use of sediment and erosion control practices at construction sites. The Site Plan Review and Subdivision Regulations were amended in April of 2018 to meet the provisions of the 2017 NH Small MS4 General Permit. The Site Plan Review and Subdivision Regulations for the Town of Exeter can be found at: https://www.exeternh.gov/sites/default/files/fileattachments/planning_board/page/14051/2021_site_subdivision_regs_amended_1-14-21.pdf. **This BMP has been achieved.**

BMP 22: Site Plan Review Procedures

The Town of Exeter relies on the Site Plan Review and Subdivision Regulations, which outline the site plan review procedures. The Site Plan Review and Subdivision Regulations were amended in April of 2018 to meet the provisions of the 2017 NH Small MS4 General Permit. The Site Plan Review and Subdivision Regulations for the Town of Exeter can be found at: https://www.exeternh.gov/sites/default/files/fileattachments/planning_board/page/14051/2021_site_subdivision_regs_amended_1-14-21.pdf.

During Permit Year 3, 7 Site Plan Review and 5 Subdivision Applications were received by the Planning Department and reviewed by the Technical Review Committee.

BMP 23: Procedures for Site Inspection and Enforcement of Erosion and Sediment Control Measures

The Town of Exeter contracts with a local engineering firm (Underwood Engineers) to perform site inspections of erosion and sediment control measures during construction. Written site plan review and construction site inspection and enforcement procedures are included in Appendix 4.1 of the Town's SWMP.

The Town of Exeter conducts construction site inspections on all projects that get Planning Board approval, and since the trigger for Planning Board approval is less than an acre, the Town does not track the number of sites greater than an acre, rather they track and inspect all projects that required Planning Board approval. During Permit Year 3, 11 sites were inspected with a total of 94 inspections completed. Approximately 8 inspections were completed per site, with some sites receiving more inspections. No formal enforcement action was needed; several contractors needed to be reminded about maintaining silt fence and stabilized construction exits. Deficiencies noted during inspections were corrected by the contractor within a few days of the inspection.

BMP 24: Construction and Site Waste Controls

The Town of Exeter incorporated requirements for construction operators to control onsite wastes into the Site Plan Review and Subdivision Regulations, which were amended in April of 2018 to meet the provisions of the 2017 NH Small MS4 General Permit. The Site Plan Review and Subdivision Regulations for the Town of Exeter can be found at:

https://www.exeternh.gov/sites/default/files/fileattachments/planning_board/page/14051/2021_site_subdivision_regs_amended_1-14-21.pdf. This BMP has been achieved.

MCM 5 – POST-CONSTRUCTION STORMWATER MANAGEMENT IN NEW DEVELOPMENT AND REDEVELOPMENT

BMP 25: Post-Construction Ordinance

The Town of Exeter will rely on the Site Plan Review and Subdivision Regulations as a regulatory mechanism to address post-construction stormwater management. The Site Plan Review and Subdivision Regulations were amended in April of 2018 to meet the provisions of the 2017 NH Small MS4 General Permit. The Site Plan Review and Subdivision Regulations for the Town of Exeter can be found at:

https://www.exeternh.gov/sites/default/files/fileattachments/planning_board/page/14051/2021_site_subdivision_regs_amended_1-14-21.pdf. This BMP has been achieved.

BMP 26: Street Design and Parking Lot Guidance Report

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

BMP 27: Green Infrastructure Report

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

BMP 28: List of Municipal Retrofit Opportunities

Deliverables will progress in accordance with the accepted NOI and are scheduled for Permit Year 4. The following is a summary of progress made toward this BMP during Permit Year 3:

The University of New Hampshire, in cooperation with the New Hampshire Department of Environmental Services, developed pollutant loading (hot spot) spreadsheets for Seacoast Stormwater Coalition and the New Hampshire Lower Merrimack Valley Stormwater Coalition member communities, including Exeter. The pollutant loading spreadsheets will be used to help identify and prioritize potential municipal retrofit opportunities. The Town also identified several locations for potential BMPs and/or retrofits within their largest drainage area (Lincoln Street subwatershed), and applied for a 319 grant for a BMP on Winter Street.

BMP 29: As-built Plans for On-site Stormwater Controls

The Town of Exeter will rely on the Site Plan Review and Subdivision Regulations for procedures to require submission of as-built plans from private development projects. The Site Plan Review and Subdivision Regulations were amended in April of 2018 to meet the provisions of the 2017 NH Small MS4 General Permit. The April of 2018 amendments also included the requirement for long term inspection and maintenance (I&M) to ensure the long-term effectiveness of approved stormwater practices (Section 9.5.2), which requires the applicant to establish a mechanism to provide for ongoing I&M. The mechanism is to include an I&M manual as well as to annually document the inspections in a written form (inspection log, maintenance log, and I&M checklist) and submit the documentation to the Exeter Public Works Department. The Site Plan Review and Subdivision Regulations for the Town of Exeter can be found at: https://www.exeternh.gov/sites/default/files/fileattachments/planning_board/page/14051/2021_site_subdivision_regs_amended_1-14-21.pdf. **This BMP has been achieved.**

As part of the effort to standardize the long-term operation and inspection submission requirements across all New Hampshire MS4 communities, as well as standardize any non-compliance actions taken by the municipality, the Seacoast Stormwater Coalition is in the process of working with a selected engineering group (VHB) to develop standardized resources, guidance and an inspection template municipalities can use to better promote, track, and enforce the implementation of best management practices for privately-owned parking areas and drainage infrastructure. The standardized resources are anticipated to be finalized in Permit Year 4.

The number of as-built drawings received in Permit Year 3: 1

MCM 6 – GOOD HOUSEKEEPING AND POLLUTION PREVENTION FOR PERMITTEE OWNED OPERATIONS

BMP 30: Parks and Open Spaces Operations and Maintenance (O&M) Procedures

Written Parks and Open spaces O&M procedures are included in Appendix 6.1 of the Town's SWMP. There were no changes to report during Permit Year 3. **This BMP has been achieved.**

BMP 31: Buildings and Facilities Operations and Maintenance (O&M) Procedures

Written Buildings and Facilities O&M procedures are included in Appendix 6.1 of the Town's SWMP. There were no changes to report during Permit Year 3. **This BMP has been achieved.**

BMP 32: Vehicles and Equipment Operations and Maintenance (O&M) Procedures

Written Vehicles and Equipment O&M procedures are included in Appendix 6.1 of the Town's SWMP. There were no changes to report during Permit Year 3. **This BMP has been achieved.**

BMP 33: Inventory Town-owned Parks and Open Spaces, Buildings and Facilities, and Vehicles and Equipment

An inventory of town-owned parks and open spaces, buildings and facilities, and vehicles and equipment are included in Appendix 6.1 of the Town's SWMP. There were no changes to report during Permit Year 3. **This BMP has been achieved.**

BMP 34: Infrastructure Operations and Maintenance (O&M) Procedures

Written infrastructure O&M procedures are included in Appendix 6.1 of the Town's SWMP. As part of the catch basin cleaning optimization (see BMP 35), Section 5.1 Catch Basin Cleaning Program of Appendix 6.1 was revised in May of 2021. **This BMP has been achieved.**

BMP 35: Catch Basin Cleaning Program

The current schedule for catch basin cleaning is to clean approximately half of the catch basins each year, with the goal of ensuring catch basin sumps are not more than 50 percent full. Catch basin cleanings are stored at the Town sand pit and mixed with compost; catch basin cleanings do not discharge to receiving waters.

In Permit Year 3, the Town hired a consultant (Wright-Pierce) to develop a catch basin optimization plan to improve the effectiveness of the Town's catch basin cleaning program. The catch basin optimization plan summarized the analysis of catch basin cleaning records from 2017 to 2020 and provided recommendations for optimizing catch basin cleaning, including actions of conducting additional cleaning for catch basins with sumps identified as greater than 50 percent full for two consecutive cleanings, if the source of the excessive sediment loading cannot be identified. The inspection form was updated to improve data collection during Permit Year 3, and additional funding was requested for catch basin cleaning in fiscal year 2022. During Permit Year 3, catch basin

cleaning was conducted from June 21, 2021 to June 30, 2021. The following is a summary of catch basin cleaning completed:

Permit Year 3 Catch Basin Cleaning Summary	2021
Total Town Maintained Catch Basins (town-wide)	1,570
Catch Basins Cleaned and Inspected	396
Catch Basin Inspected Only	0
Total Sediment Removed (ft ³)	~3,800 +/-

BMP 36: Street Sweeping Program

The Town of Exeter sweeps streets and municipally-owned parking lots a minimum of two times per year (spring and fall), and generally sweeps 30 hours a week from early March to late November; however, the sweeper was out-of-service for 8 weeks (June and July of 2021) as a result of a major breakdown. During Permit Year 3, the number of lane-miles swept could not be reported because the GPS tracking information was not available (company that provides this service went out of business). Approximately 500 cubic yards of material were removed, which is less than usual as a result of the sweeper being out of service. Street sweepings are stored at the Town sand pit to mix with compost, and do not discharge to receiving waters.

BMP 37: Winter Road Maintenance Program

The Town of Exeter follows the guidance of the Green SnowPro certification for optimizing salt spreading operations. The salt storage pile at the Department of Public Works (DPW) Complex is enclosed to reduce runoff into storm drains and waterbodies. A winter road maintenance program has been established with a goal of reducing salt usage and included in Appendix 6.1 of the Town's SWMP.

BMP 38: Stormwater Treatment Structures Inspection and Maintenance Procedures

Town-operated treatment units are typically inspected and maintained annually; however, in Permit Year 3 BMPs were not inspected and maintained because funding was cut due to COVID-19. An inventory of municipally-owned or operated structural BMPs and written inspection and maintenance procedures are included in Appendix 6.1 of the Town's SWMP.

BMP 39: Stormwater Pollution Prevention Plan (SWPPP)

A SWPPP is implemented for the DPW Complex. The Town hired a consultant (Wright-Pierce) to conduct the quarterly site inspections at the DPW Complex. During Permit Year 3, three site inspections were conducted (December 11, 2020, April 13, 2021, and June 25, 2021). Corrective action for Oil Water Separator #2 was taken to prevent it from surcharging by removing a partial plug from the outlet of the oil water separator to the existing sewer line. A sump pump may be installed in a downstream manhole, if the problem persists.

TMDLS AND WATER QUALITY LIMITED WATERS

The list of receiving waters, outfalls, and impairments was reviewed as part of BMP 15. No updates were made to the relevant impairments or TMDLs; however, the number of outfalls discharging to the receiving waters was updated accordingly (see attached MS4 Outfall Summary).

Bacteria/Pathogens

Outfalls to these receiving waters were ranked as high priority for the IDDE implementation during the update to the initial outfall inventory and priority ranking (relevant BMP: 15). For the status of other relevant BMPs in the SWMP that address enhanced BMPs for Bacteria/Pathogens, refer to BMPs 1 and 5.

Nitrogen

Outfalls to these receiving waters were ranked as high priority for the IDDE implementation during the update to the initial outfall inventory and priority ranking (relevant BMP: 15). For the status of other relevant BMPs in the SWMP that address enhanced BMPs for Nitrogen, refer to BMPs 1, 2, 6, 25, 28, 30, 31, and 36.

The Town of Exeter through its participation in the Seacoast Stormwater Coalition and continued involvement with the NHDES Pollutant Tracking and Accounting Project (PTAP) satisfies the tracking and accounting requirement of the municipally-owned structural BMPs listed in Attachment 1 to Appendix H. The 2020 PTAP municipal report for Exeter is attached to the annual report (see Attachment for TMDL and Water Quality Limited Waters – Nitrogen).

Solids, Oil and Grease (Hydrocarbons), or Metals

Outfalls to these receiving waters were ranked as high priority for the IDDE implementation during the update to the initial outfall inventory and priority ranking (relevant BMP: 15). For the status of other relevant BMPs in the SWMP that address enhanced BMPs for Solids, Oil and Grease (Hydrocarbons), or Metals, refer to BMPs 35 and 36.

Chloride

It should be noted that Part 2.2.2.d.i.1 of the 2017 NH Small MS4 General Permit lists Exeter as a municipality/MS4 discharging to waterbodies impaired due to chloride. Upon further review and discussion with NHDES and EPA, it was determined that this listing was in error. Exeter MS4 does not discharge to waterbodies impaired due to chloride and is not subject to the enhanced requirements of Part IV of Appendix H.

ADDITIONAL INFORMATION

Monitoring or Study Results

Results from 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. **Not applicable.**

DESCRIPTION OF ANY CHANGES IN IDENTIFIED BMPS OR MEASURABLE GOALS

The Town of Exeter has implemented activities in accordance with the approved NOI. All BMPs and measurable goals as outlined in the approved NOI are appropriate.

It should be noted that the description of BMP 1 was expanded with more detail as included in the annual report (Permit Year 1).

In Permit Year 2, BMP 3 Development Regulations Fact Sheet Brochures/Pamphlets was modified by relying on the Town's checklist in the Planning Board applications for outreach to developers rather than distributing a separate regulations fact sheet to developers.

ACTIVITIES FOR THE NEXT REPORTING PERIOD

The Town of Exeter will continue to implement activities in accordance with the approved NOI and as noted in the Annual Report.