

Year 6 Annual Report

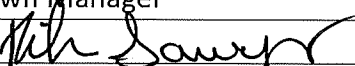
New Hampshire Small MS4 General Permit

Reporting Period: July 1, 2023 - June 30, 2024

Bedford, NH

Certification of Small MS4 Year 6 Annual Report

"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: Rick Sawyer	
Title: Town Manager	
Signature: 	Date: 9/18/2024

Authorized Representative:

The authorization letter is:

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

N/A

☐ Publicly available at the website:

N/A

Primary MS4 Program Manager Contact Information:

Name: Jeanne Walker	Title/Position: Assistant Town Manager	
Department: Town Manager		
Street Address: 24 N Amherst Rd		
City: Bedford	State: New Hampshire	Zip Code: 03110
Email: jwalker@bedfordnh.org	Phone Number: 603-792-1325	

Small MS4 Authorization

The following annual report, which serves as a self-assessment, is intended to document the activities undertaken over the **reporting period from July 1, 2023, through June 30, 2024**, in accordance with the Permit.

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 Town of Bedford's Stormwater Management Program Plan (SWMP) and Illicit Discharge Detection and Elimination (IDDE) Plan. Those documents and other pertinent Year 6 information can be found in submission or at the following websites, and will be referred to throughout this report:

SWMP: https://www.bedfordnh.org/DocumentCenter/View/4891/Bedford-SWMP?bidId=
Date SWMP was Last Updated: 9/12/2024
IDDE Program Plan: https://www.bedfordnh.org/DocumentCenter/View/4065/MCM-3
Updated System Map: https://bedfordnh.maps.arcgis.com/apps/webappviewer/index.html?id=139e6262415044d59a78f9b6625975bd
Progress on Completion of System Map: 99%
Updated SSO Inventory: None for this reporting period
Updated Inventory and Ranking of Outfalls/Interconnections: https://www.bedfordnh.org/DocumentCenterNiew/5966/Bedford-Outfalls-Spreadsheet
Dry Weather Screening Data: None for this reporting period – See past annual reports
Wet Weather Screening Data: None for this reporting period – previous dry weather screening and sewer video inspection found no interconnections
Catchment Investigation Data: None for this reporting period
System Vulnerability Factors: https://www.bedfordnh.org/DocumentCenter/View/7956/Bedford-Outfalls-Spreadsheet
Illicit Discharge Removal Report: None for this reporting period
Results from additional stormwater or receiving water quality monitoring reports or studies: N/A
PTAP 2024 Nutrient Reduction Report: https://www.bedfordnh.org/DocumentCenter/View/7955/BATT-Report_Bedford_2024-09-16
Salt Reduction Plan: https://www.bedfordnh.org/DocumentCenter/View/6175/Appendix-H-Salt-Reduction-Plan
Annual Salt Usage Report https://www.bedfordnh.org/DocumentCenter/View/7957/Year-6_Salt-Usage-Report_Bedford

Updated Nitrogen Source Identification Report: N/A
Updated Phosphorus Source Identification Report: N/A
Street Sweeping Schedule: https://www.bedfordnh.org/DocumentCenter/View/7954/DPW25-05-Scheduling
Chloride Reduction Plan: N/A
Lake Phosphorus Control Plan: https://bedfordnh.maps.arcgis.com/home/item.html?id=e4e7c0a478f7472a8daa8201995ed2a8
Nutrient Tracking Program Report: N/A

Self-Assessment

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

Receiving Waters/Impaired Waters/TMDL

Have there been any changes to your lists of **receiving waters or impairments** since the NOI was submitted?

☒ Yes

There has been **1** change to the lists of **receiving waters or impairments** since the NOI submission.

Have there been any changes to your **list of outfalls** since the NOI was submitted?

☒ No

The Town of Bedford has not made changes to the **list of outfalls** since the NOI submission.

Describe progress made on any **incomplete requirements** listed above **or** optionally provide any additional relevant details, in the box below:

In our Year 5 report, the Town notified the EPA that South Perimeter Brook, located in Manchester, was incorrectly listed as being in Bedford. However, Bedford is still associated with the Brook in the 2020-2022 303(d) list.

Minimum Control Measures

MCM 1: Public Education

Total number of all MS4 related educational efforts completed *during this reporting period*: 10

Were any of the messages below different than what was proposed in your NOI?

☐ No.

☒ Yes. The Town of Bedford made minor changes to educational efforts to refresh messaging.

BMP #1.1: Septic System Maintenance – Brochures/Pamphlets

Document Name: "Get Pumped!" Brochure

Web Address: <https://www.bedfordnh.org/DocumentCenter/View/4103/Septic-System-Maintenance-Brochure>

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

Responsible Department/Parties: Bedford Public Works Department

Measurable Goal(s): Increase residents' awareness of septic system maintenance and water quality impacts. Measurement includes materials distribution methods and/or numbers and/or change in visits to municipal stormwater webpages.

Message Date: Annually/Ongoing

Following is the number of municipal stormwater webpage views: **2,263 (+8.44% YoY)**

Goal was achieved.

BMP 1.2: Pet Waste Disposal – Brochures/Pamphlets/Display

Document Name "Every Drop" Brochure

Web Address: <https://www.bedfordnh.org/DocumentCenter/View/4102/Petwaste-Disposal-Brochure>

Description: Distribution and promotion of "Every Drop" flyer with proper pet waste management, impacts of improper management, pet waste ordinance, and disposal requirements messaging. May include pledge to pick up pet waste. Available during dog registration and posted at the Town office and on the town's stormwater website. Every Drop is a collaborative education effort with PREP, NHDES and other partners.

Targeted Audience: Residents - Pet Owners

Responsible Department/Parties: Bedford Public Works Department

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. Measurement includes materials distribution methods and/or numbers and/or change in visits to municipal stormwater webpages.

Message Date: Annually/Ongoing

Following is the number of municipal stormwater webpage views: **2,263 (+8.44% YoY)**
Goal was achieved.

BMP 1.3: Grass and Fertilizer – Brochures/Pamphlets

Document Name: "Green Grass & Clear Water" Brochure

Web Address: <https://www.bedfordnh.org/DocumentCenter/View/4101/Grass-and-Fertilizer-Brochure>

Description: Distribution and promotion of brochure 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.

Targeted Audience: Residences, Businesses and Institutions

Responsible Department/Parties: Bedford Public Works Department

Measurable Goal(s): 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. Measurement includes materials distribution methods and/or numbers and/or change in visits to municipal stormwater webpages.

Message Date: Annually/Ongoing

Following is the number of municipal stormwater webpage views: **2,263 (+8.44% YoY)**
Goal was achieved.

BMP 1.4: Disposal of Leaf and Grass Clipping – Brochures/Pamphlets

Document Name: "Rake it or Leave it" Brochure

Web Address: <https://www.bedfordnh.org/DocumentCenter/View/4227/Leaf-Litter-Brochure>

Description: Distribute and promote informational flyer with messaging about impacts from yard waste on waterbodies, alternatives to dumping yard waste and laws against dumping yard waste near or in waterbodies. Promote and provide information to residents regarding the Town's new composting program.

Targeted Audience: Residences, Businesses and Institutions

Responsible Department/Parties: Bedford Public Works Department.

Measurable Goal(s): Measurement includes materials distribution methods and/or numbers and/or change in visits to municipal stormwater webpages. Track observations of any changes in known dumping sites. Following year 4, the Town is investigating how to best track reduction in fertilizer use due to composting program.

Message Date: Annually/Ongoing

Following is the number of municipal stormwater webpage views: **2,263 (+8.44% YoY)**
Goal was achieved.

BMP 1.5: Environmentally Friendly Lawn Tips – Brochure/Newsletter

Document Name: Spring 2024 Newsletter Bulletin

Web Address: <https://www.bedfordnh.org/DocumentCenter/View/7725/Spring-2024-Newsletter>

Description: Information on environmentally friendly lawn maintenance tips. Information is available in the Spring '24 DPW newsletter.

Targeted Audience: Residents, businesses, institutions, commercial facilities, landscaping companies and private maintenance and snowplowing contractors.

Responsible Department/Parties: Bedford Public Works Department

Measurable Goal(s): 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. Measurement includes numbers of visits to newsletter webpage.

Message Date: Annually/Ongoing

Following is the number of spring newsletter views: **18**

Goal was achieved.

BMP 1.6: Storm Water Website

Website: <https://ms4-and-storm-water-management-bedfordnh.hub.arcgis.com/>

Description: Information on MS4 permit requirements and posting of related documents, notices and materials regular pumping and maintenance of septic systems.

Targeted Audience: All target audiences

Responsible Department/Parties: Bedford Public Works Department/Website Administrator.

Measurable Goal(s): Maintain an up-to-date website for dissemination and posting of MS4 permit and stormwater information. Measurement includes materials distribution methods and/or numbers and/or change in visits to municipal stormwater webpages.

Message Date: Annually/Ongoing

Following is the number of municipal stormwater webpage views: **2,263 (+8.44% YoY)**

Goal was achieved.

BMP 1.7: Using the Right Amount of Salt this Winter – Brochure/Newsletter

Document Name: Winter 2023/24 Newsletter Salt Bulletin

Web Address: <https://www.bedfordnh.org/DocumentCenter/View/7010/DPW-Winter-2023-Newsletter>

Description: Information on storage/use of salt or deicing materials. Information is available on the in the winter DPW newsletter.

Targeted Audience: Residents, businesses, institutions, commercial facilities, landscaping companies and private maintenance and snowplowing contractors.

Responsible Department/Parties: Bedford Public Works Department

Measurable Goal(s): Increase awareness of effects that salt or deicing materials have on surrounding environment and water quality; Increase awareness to better manage and reduce the amount of salt or deicing materials used; Increase awareness of proper storage of salt or deicing materials. Measurement

includes numbers of visits to municipal stormwater webpages.

Message Date: Annually/Ongoing

Following is the number of winter newsletter views: **27**

Goal was achieved.

BMP 1.8: Salt Storage and Use – Brochures/Pamphlets

Document Name: Stormwater and Land Disturbance Management Regulations

Web Address: www.bedfordnh.org/DocumentCenter/View/4245/Stormwater-and-Land-Disturbance-Management-Regulations (page 3, #5)

Description: Information on storage/use of salt or deicing materials. Information is be available on the Town website.

Targeted Audience: Industrial facilities

Responsible Department/Parties: Bedford Public Works Department

Measurable Goal(s): Increase awareness of effects that salt or deicing materials have on surrounding environment and water quality; Increase awareness to better manage and reduce the amount of salt or deicing materials used; Increase awareness of proper storage of salt or deicing materials. Measurement includes materials distribution methods and/or numbers and/or change in visits to municipal stormwater webpages.

Message Date: Annually/Ongoing

Following is the number of municipal stormwater webpage views: **2,263 (+8.44% YoY)**

Goal was achieved.

BMP 1.9: Proper Leaf Cleanup Matters! – Brochure/Newsletter

Document Name: Fall 2023 Newsletter Pet Waste Bulletin

Web Address: <https://www.bedfordnh.org/DocumentCenter/View/6839/DPW-Fall-2023-Newsletter>

Description: Information on proper leaf cleanup included in fall '24 newsletter.

Targeted Audience: Residents

Responsible Department/Parties: Bedford Public Works Department

Measurable Goal(s): includes views of the quarterly newsletter.

Message Date: Annually/Ongoing

Following is the number of fall newsletter views: **11**

Goal was achieved.

BMP 1.10: Construction/Developers Outreach

Outreach Resources:

Construction/developers are required to submit a Stormwater and Land Disturbance Management Permit and comply with the Stormwater and Land Disturbance Management Regulations to receive final approval. Stormwater and Land Disturbance Management Regulations are made available publicly on our town website.

Description:

Review the stormwater permit with developers and construction contractors prior to the beginning of construction projects (pre-construction) to identify responsible parties, erosion control practices, other best management practices, and requirements for the EPA Construction General Permit as appropriate.

Targeted Audience:

Construction/Developers

Responsible Department/Parties: Bedford Public Works Department

Measurable Goal(s):

Contractors, developers, and municipal or local organizations are made aware of the EPA 2022 Construction General Permit and its associated requirements including that those who wish to be considered a qualified person to conduct inspections must meet EPA training standards. Contractors, developers, and municipal or local organizations are also educated on how to properly select, install, and maintain construction related best management practices.

Following is the number Stormwater and Land Disturbance Management Permit Applications received from contractors, developers, and municipal or local organizations ***during this reporting period: 5***

The Town of Bedford held 5 pre-construction meetings, representing 100 % of projects that received planning board approval and began construction ***during this reporting period.***

Goal was achieved.

Message Date: Ongoing

Describe progress made on any **incomplete requirements** listed above **or** optionally provide any additional relevant details, in the box below:

Further development of the construction/developer outreach process/methods are under consideration for permit year 7. Additionally, assessing better newsletter metric tracking and/or Search Engine Optimization to increase tracking/reach.

MCM 2: Public Participation

- ☒ Provided an opportunity for public participation in review and implementation of SWMP and complied with State Public Notice requirements as described in the Town of Bedford SWMP.
- ☒ Kept records relating to the permit for 5 years and made available to the public.

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

Description:

The Stormwater Management Program (SWMP) was publicly available with a contact link to provide comments on the Town Stormwater Website (<https://ms4-and-storm-water-management-bedfordnh.hub.arcgis.com/>). Documents and records relating to the permit are retained and available for 5 years to the public at DPW administration office located at 55 Constitution Drive.

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

☐ No.

☒ Yes. The Town of Bedford made the following changes: Utilizing Stormwater Website as additional location to host SWMP.

Measurable Goal(s):

Input was received and records are maintained.

Goal was achieved.

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

Public involvement or participation opportunities are integrated into daily operations through outreach, communication, and engagement during both operational and administrative activities.

Describe progress made on any **incomplete requirements** listed above or optionally provide any additional relevant details, in the box below:

N/A

MCM 3: Illicit Discharge Detection and Elimination (IDDE)

Sanitary Sewer Overflows (SSOs)

- ☒ This SSO section is NOT applicable because we DID NOT find any new SSOs.

Below, report on the number of SSOs identified in the MS4 system and removed:

Number of SSOs identified **during this reporting period**: 0

Number of SSOs removed **during this reporting period**: 0

MS4 System Mapping

- ☒ Updated **Phase 1** system map due in Year 2 as necessary:

Provide additional status information regarding your map:

Map of storm sewer system and associated outfalls is continually updated to reflect findings and changes.

- ☒ Updated **Phase 2** system map (due in Year 10):

Percent of Phase 2 map completed: 99% as of June 30, 2024.

Map of storm sewer system, catchments, and related elements is continually updated to incorporate findings and changes from catchment investigations.

Screening of Outfalls/Interconnections

Dry Weather Screening

- ☒ No outfalls were inspected for dry weather screening **during this report period**.

Below, report on the number of outfalls screened in the MS4 system:

Number of outfalls/interconnections screened **during this reporting period**: 0

Percent of total known outfalls/interconnections screened **to date (Year 1 – Year 6)**: 100%

The inventory and ranking of outfalls/interconnections was not updated during Year 6 because outfalls/interconnections were not inspected.

Wet Weather Screening

- ☒ No outfalls/interconnections were inspected for wet weather screening **during this report period**.

Number of outfalls screened **during this reporting period**: 0

Percent of total known outfalls/interconnections screened **to date (Year 1 – Year 6)**: 100%

Catchment Investigations

- ☒ No catchment investigations were conducted **during this report period**. Catchment investigations include investigations associated with Problem, High Priority, and Low Priority Outfalls/Interconnections within the MS4 regulated area.

Number of catchment investigations **during this reporting period**: 0.

Percentage of total catchments investigated **to date (Year 1 - Year 6)**: 0%

IDDE Progress

- ☒ No illicit discharges were found **during this reporting period**.

Number of illicit discharges identified **during this reporting period**: 0

Number of illicit discharges removed **during this reporting period**: 0

Estimated gallons of flow removed **during this reporting period**: 0 gallons/day

Total number of illicit discharges identified **since the effective date of the permit (July 1, 2018 – June 30, 2024)**: 6

Total number of illicit discharges removed **since the effective date of the permit (July 1, 2018 – June 30, 2024)**: 6

Employee Training

- ☒ Provided training to employees involved in IDDE program **during this reporting period**:

The Town of Bedford conducted two formal training sessions on utilizing a zoom camera for infrastructure inspections. Additionally, multiple informal IDDE training sessions were held for municipal staff on various dates. The Town also regularly provides IDDE materials and training to applicable employees, in accordance with the IDDE Program Plan, with information on identifying illicit discharges and SSOs

Describe progress made on any **incomplete requirements** listed above or optionally provide any additional relevant details, in the box below:

Staffing issues impacted some of our formal training sessions this year. We are reviewing our training process to ensure future scheduling disruptions are more easily mitigated.

MCM 4: Construction Site Stormwater Runoff Control

The following tasks are in progress in accordance with the permit:

Number of site plan reviews completed *during this reporting period*: 13

Number of site plans requiring **stormwater permit**: 5

Number of inspections completed *during this reporting period*: 11

Number of enforcement actions taken *during this reporting period*: 0

The Town of Bedford works closely with contractors to address environmental concerns for the least environmental impact.

Describe progress made on any **incomplete requirements** listed above **or** optionally provide any additional relevant details, in the box below:

The Town has begun utilizing in-house inspectors for projects that will lead to ownership by the Town. A tracking and reporting system is being developed for these projects and those metrics will be available for the next reporting period.

MCM 5: Post-Construction Stormwater Management in New Development and Redevelopment

Ordinance or Regulatory Mechanism

- ☒ The Town of Bedford has a regulatory mechanism consistent with permit requirements.
Date regulatory mechanism was adopted: December 11, 2019. The regulatory document can be found at: <https://www.bedfordnh.org/DocumentCenter/View/4245/Stormwater-and-Land-Disturbance-Managment-Regulations>

As-built Drawings

Number of as-built drawings received *during this reporting period*: 1

Street Design and Parking Lots Report

- ☒ No updates were made *during this reporting period* because all required updates have been made to make low impact designs allowable as outlined in the **Assessment Report**.
- ☒ No updates were made or planned to be made to **Local Regulations or Guidelines** *during this reporting period*.

Green Infrastructure Reports

- ☒ No updates were made *during this reporting period* because all required updates have been made to make green infrastructure practices allowable as outlined in the **Assessment Report**. ☒
No updates were made *during this reporting period* because all required **Local Regulation** updates have been made to make green infrastructure practices allowable as outlined in the Assessment Report.

Retrofit Properties Inventory

- ☒ The Town of Bedford has identified the remaining permittee-owned properties that could be modified or retrofitted with BMPs to mitigate impervious areas and of which are included in the list below:

List of MS4 Properties:

1. 20 County Rd
2. 19 Nashua Rd
3. 55 Constitution Dr
4. 3 Meetinghouse Rd

5. 24 N Amherst Rd

List of Non-MS4 Properties: N/A

- ☒ The Town of Bedford has modified or retrofitted the following MS4 properties with BMPs to mitigate impervious area that were inventoried as part of 2.3.6.e of the permit. Following is a list of the properties that were modified or retrofitted as well as the type of BMP(s) that were implemented:

List of MS4 Properties:

1. 77 Chubbuck Rd – A Winter Sand Structure was installed to cover the sand/salt mix made available for public use.
2. 19 Chubbuck Rd – A Sand Shed is currently under construction (Project began in Year 6) to cover sand used in both winter and construction operations.

List of Non-MS4 Properties: N/A

Describe progress made on any **incomplete requirements** listed above or optionally provide any additional relevant details, in the box below:

While the Town continues to assess further retrofit opportunities, drainage improvements within the town's right-of-way (ROW) have been prioritized. Specifically, four projects were completed during Year 6 to address spot icing issues. These improvements help reduce salt usage, erosion, and pollutant transport.

MCM 6: Good Housekeeping

Catch Basin Cleaning

- ☒ Stored and disposed of catch basin cleanings so they did not discharge to receiving waters.
- ☒ Report on the actions taken if a catch basin sump is more than 50% full during two consecutive routine inspections/cleaning events:
 - 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.

Number of catch basins inspected *during this reporting period*: 386

Number of catch basins cleaned *during this reporting period*: 386

Total volume or mass of material removed from all catch basins *during this reporting period*: 435.6 Cubic Yards

Total number of catch basins within the MS4 system: 2,260

Street Sweeping

- ☒ Stored and disposed of street sweepings so they did not discharge to receiving waters.
- ☒ All curbed roadways were swept at least once within the reporting period.

All curbed roadways were swept at least once *during this reporting period*.

Number of (lane) miles swept *during this reporting period*: 67.12

Volume of swept material *during this reporting period*: 33.25 Cubic Yards

Stormwater Pollution Prevention Plan (SWPPP)

The Town of Bedford has implemented SWPPPs for all permittee owned or operated maintenance garages, public works yards, transfer stations, and other waste handling facilities that are not currently covered under another NPDES Permit.

Number of site inspections completed for *during this reporting period*: 2

Number of corrective actions taken *during this reporting period*: 1

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

1 corrective action taken to stabilize the slope near the inlet of the northwest culvert at the highway garage.

Operations and Maintenance (O & M) Programs

- ☒ O&M programs for all permittee owned facilities have been completed and/or updated as noted below:
- ☒ Implemented all maintenance procedures for permittee owned facilities in accordance with O&M programs.
 - ☒ Updated inventory of all permittee owned facilities as necessary.
All permittee owned facilities, including an inventory, are included in our SWMP. There were no changes to report during Year 6.
 - ☒ Implemented program for MS4 infrastructure maintenance to reduce the discharge of pollutants as outlined in the SWMP.
 - ☒ Inspected all permittee owned treatment structures (excluding catch basins) as outlined in the SWMP.
 - ☒ Enclosed all road salt storage piles or facilities and implemented winter road maintenance procedures to minimize the use of road salt as outlined in the SWMP.

Describe progress made on any **incomplete requirements** listed above **or** optionally provide any additional relevant details, in the box below:

N/A

Appendix F and H: Water Quality Limited Waters & TMDLs

Bacteria/Pathogens Impairment (Appendix H) AND TMDL (Appendix F)

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

Describe progress made on any **incomplete requirements** listed above or optionally provide any additional relevant details, in the box below:

N/A

Chloride Impairment (Appendix H)

☒ Permittee **has** a chloride impairment.

☒ Fully implemented Salt Reduction Plan which can be found here:

<https://www.bedfordnh.org/DocumentCenter/View/6175/Appendix-H-Salt-Reduction-Plan>

The Municipal Green SnowPro Certification Program's (Program) rules and regulations were approved and adopted in 2024. The Program anticipates they will be ready to accept voluntary applications from municipalities in fall of 2024.

☒ Reported amount of salt applied to all municipally-owned and maintained surfaces by completing the New Hampshire DES Annual Salt Usage reporting form and submitting it to NHDES, and can be found: [https://www.bedfordnh.org/DocumentCenter/View/7957/Year-6 Salt-Usage-Report Bedford](https://www.bedfordnh.org/DocumentCenter/View/7957/Year-6-Salt-Usage-Report-Bedford)

The UNH Technology Transfer Center online tool is non-functional and has been for several years.

Describe progress made on any **incomplete requirements** listed above **or** optionally provide any additional relevant details, in the box below:

N/A

Nitrogen Impairment (Appendix H)

☒ Permittee **does not** have a nitrogen impairment.

Phosphorus Impairment (Appendix H)

☒ Permittee **does not** have a phosphorus impairment.

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

- ☒ Permittee **has** a solids, oil and grease, or metals impairment(s).
 - ☒ Increased street sweeping frequency of all municipal owned streets and parking lots to a schedule that targets areas with potential for high pollutant loads **during this reporting period**. The Town of Bedford street sweeping schedule can be found here: https://efc0407c-c5cc-4b08-8092-d97a92d9fc89.usrfiles.com/ugd/efc040_ac972bf743324f5887aec888413ca205.docx

Describe progress made on any **incomplete requirements** listed above **or** optionally provide any additional relevant details, in the box below:

The street sweeper broke down twice for a total of 6 weeks out of service. Minimum sweeping goals were still achieved but we typically go beyond the minimum.

Chloride TMDL (Appendix F)

☒ Permittee **does not** have a chloride TMDL.

Lake and Pond Phosphorus TMDL (Appendix F)

☒ Permittee **has** a lake and pond phosphorus TMDL.

Year 5 Lake Phosphorus Control Plan Reporting Requirements

- ☒ The Town of Bedford **completed** a written Lake Phosphorus Control Plan *during this reporting period*. The Town utilized the resources developed by the New Hampshire Stormwater Coalition. Resources, including the written Lake Phosphorus Control Plan template, were not developed until after the Year 5 reporting period. The completed plan can be found :
<https://bedfordnh.maps.arcgis.com/home/item.html?id=e4e7c0a478f7472a8daa8201995ed2a8> .

The plan is available to the public at: <https://ms4-and-storm-water-management-bedfordnh.hub.arcgis.com/>

The completed written Lake Phosphorus Control Plan contains the following information:

- ☒ Description of Planned Non-structural Controls
- ☒ Description of Planned Structural Controls
- ☒ Description of Operation and Maintenance (O&M) Program
- ☒ Implementation Schedule
- ☒ Cost and Funding Source Assessment

Additional Comment:

The Town has two waterbodies with Lake Phosphorus TMDLs: Sandy Pond and Sebbins Pond. We have developed an LPCP (Lake Phosphorus Control Plan) for Sandy Pond. Recently, we applied for and were awarded a grant to prepare an LPCP for the Sebbins Pond watershed. If feasible, we hope to combine both waterbodies into a single plan, as they are in close proximity to each other. Grouping the plans would allow for a more efficient use of resources, streamlined management efforts, and a coordinated approach to phosphorus reduction in the area.

Year 6 Lake Phosphorus Control Plan Reporting Requirements

Baseline phosphorus export rate required from LPCP Area (lbs/year): 15.17

Total phosphorus reduction from all implemented nonstructural controls **during this reporting period** (lbs/year): 1.39

Total phosphorus reduction from all structural controls installed **during this reporting period and all previous years** (lbs/year): 0.1

Phosphorus load increase due to development incurred since baseline loading was calculated in lbs/year: 0

The Town of Bedford is utilizing the resources developed by the New Hampshire Stormwater Coalition. Resources have been developed but the **phosphorus load increase due to development incurred since baseline loading** was not calculated **during this reporting period**. The New Hampshire Stormwater Coalition is in the process of calculating the **phosphorus load increase due to development incurred since baseline loading** and will be available during Year 7. The Town will provide an update on the progress in the Year 7 Annual Report.

Current phosphorus export rate from the LPCP Area in lbs/year: 13.68

Non-Structural Controls

- ☒ The Town of Bedford has implemented all selected Lake Phosphorus Control Plan **non-structural control measure(s) during this reporting period** and documented the measure(s) and their phosphorus reductions. The **non-structural control measure(s)** are noted within the Town's written Lake Phosphorus Control Plan which can be found: <https://bedfordnh.maps.arcgis.com/home/item.html?id=e4e7c0a478f7472a8daa8201995ed2a8>

The Town of Bedford is utilizing the Pollutant Tracking and Account Project, better known as PTAP, to track nutrient reductions associated with non-structural best management practices. PTAP was developed by the University of New Hampshire Stormwater Center and New Hampshire Department of Environmental Services utilizing the EPA Region 1 approved performance curves, to provide New Hampshire communities with a way to track their nutrient reductions. PTAP allows the Town the benefit of utilizing a uniform, defensible and consistent method for tracking reductions so that a common, weight of evidence based approach can be shared with other entities including EPA, NHDES, and other MS4 communities and interest groups. The consistent and systematic tracking and accounting framework also allows for routine updates when improved science becomes available.

Structural Controls

- ☒ The Town of Bedford has installed **structural control measure(s)** within the Lake Phosphorus Control Plan area **during this reporting period or during previous reporting periods**. The Town has documented the location, phosphorus reduction in weight/year, and date of last completed maintenance and inspection for each installed structural control measure(s). The documented information for each of the installed structural control measure(s) are noted within the written Lake Phosphorus Control Plan which can be found:
<https://bedfordnh.maps.arcgis.com/home/item.html?id=e4e7c0a478f7472a8daa8201995ed2a8>

The Town of Bedford is utilizing the Pollutant Tracking and Account Project, better known as PTAP, to track nutrient reductions associated with structural best management practices. PTAP was developed by the University of New Hampshire Stormwater Center and New Hampshire Department of Environmental Services utilizing the EPA Region 1 approved performance curves, to provide New Hampshire communities with a way to track their nutrient reductions. PTAP allows the Town the benefit of utilizing a uniform, defensible and consistent method for tracking reductions so that a common, weight of evidence based approach can be shared with other entities including EPA, NHDES, and other MS4 communities and interest groups. The consistent and systematic tracking and accounting framework also allows for routine updates when improved science becomes available.

Describe progress made on any **incomplete requirements** listed above **or** optionally provide any additional relevant details, in the box below:

Although we have secured a grant to prepare an LPCP for Sebbins Pond, the development of this plan is still pending. At present, no standalone LPCP has been finalized for Sebbins Pond, as we are exploring the possibility of combining it with the Sandy Pond LPCP for a more integrated approach.

Additional Required Information

Monitoring or Study Results

Results from all stormwater or receiving water quality monitoring or studies conducted *during the reporting period* and *not otherwise mentioned above*, where the data is being used to inform permit compliance or permit effectiveness is:

☒ Not applicable.

Description of Any Changes in Identified BMPs or Measurable Goals

The Town of Bedford has implemented activities in accordance with the permit and outlined in the SWMP. All BMPs and measurable goals outlined in the SWMP are appropriate.

Activities Planned for Next Reporting Period

The Town of Bedford will continue to implement activities in accordance with the permit and SWMP.