

**Year 6 Annual Report**  
**New Hampshire Small MS4 General Permit**

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

**Strafford County Complex**  
**Non-Traditional MS-4**

EPA NPDES Permit Number NHR042002

# 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:	Douglas Kane
Title:	Maintenance Director
Signature:	
	Date: 09/30/2024

## Primary MS4 Program Manager Contact Information:

Name:	Douglas Kane	Title/Position:	Maintenance Director
Department:	Maintenance		
Street Address:	276 County Farm		
City:	Dover	State:	New Hampshire
Email:	dkane@co.strafford.nh.us		
	Phone Number: 603-516-4159		

# 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 Strafford County Complex's Stormwater Management Program Plan (SWMP) and Illicit Discharge Detection and Elimination (IDDE) Plan. The SWMP and IDDE are applicable to the complex facility only, and are considered a non-traditional MS-4. 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: <a href="https://co.strafford.nh.us/county-information/stormwater-management-program">https://co.strafford.nh.us/county-information/stormwater-management-program</a>
Date SWMP was Last Updated: 2022 (website will be updated in Permit Year 7)
IDDE Program Plan: <a href="https://co.strafford.nh.us/county-information/stormwater-management-program">https://co.strafford.nh.us/county-information/stormwater-management-program</a>
Updated System Map: System Map was Updated during Permit Year 6.
Progress on Completion of System Map: Updated Mapping planned for Permit Year 7.
Updated SSO Inventory: No SSOs have been identified.
Updated Inventory and Ranking of Outfalls/Interconnections: N/A
Dry Weather Screening Data: Dry weather screening was completed in Year 2.
Wet Weather Screening Data: Wet weather screening is planned for Permit Year 7
Catchment Investigation Data: N/A
System Vulnerability Factors: N/A
Illicit Discharge Removal Report: N/A
Results from additional stormwater or receiving water quality monitoring reports or studies: N/A
PTAP 2024 Nutrient Reduction Report: N/A
Salt Reduction Plan: N/A
Annual Salt Usage Report N/A
Updated Nitrogen Source Identification Report: N/A
PTAP 2024 Nutrient Reduction Report: N/A
The Stafford County Complex Nutrient Tracking Program Report: N/A
Updated Phosphorus Source Identification Report: N/A
PTAP 2024 Nutrient Reduction Report: N/A
The Stafford County Complex Nutrient Tracking Program Report: N/A
Street Sweeping Schedule: N/A

Chloride Reduction Plan: N/A
Annual Salt Usage Report: N/A
Lake Phosphorus Control Plan: N/A
PTAP 2024 Nutrient Reduction Report: N/A
The Strafford County Complex Nutrient Tracking Program Report: N/A

# Self-Assessment

Select the impairment(s) and/or TMDL(s) that are applicable to your MS4. Make sure you are referring to the [2020/2022 EPA approved Section 303\(d\) Impaired Waters List](#) which was used for the Year 6 reporting period and can be found on the [New Hampshire Department of Environmental Services \(NHDES\) webpage](#).

All **Appendix F and H requirements** can be found under “Appendix F and H: Water Quality Limited Waters & TMDLs” section of this report.

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

Changes have been made to the lists of receiving waters or impairments since the NOI submission. The following **impairments and/or TMDLs** have been added or delisted:

Water Quality Impaired Waters: N/A

TMDL: N/A

No

There have been no changes 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?

Yes

Changes have been made to the **list of outfalls** since the NOI submission.

A total of 0 outfall(s) have added.

A total of 0 outfall(s) have removed.

No

The Stafford County Complex 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:

N/A

# Minimum Control Measures

## MCM 1: Public Education

Total number of all MS4 related educational efforts completed *during this reporting period*: 3

In addition to the BMPs identified below, the Strafford County Complex coordinates outreach and education initiatives with the City of Dover. The Strafford County Complex also provided a link to the NH Stormwater Coalition website that includes additional BMP documents.

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

No.

Yes. The Strafford County Complex made changes due to N/A.

### BMP: Grass and Fertilizer

#### **Outreach Resources:**

Grass and fertilizer related flyers, mailers, postcards, videos and social media posts found on the [MCM #1 webpage](#) of the NH MS4 website.

#### **Description:**

Strafford County Stormwater Management website links to the NH MS4 website which offers relevant information for homeowners and grass and fertilizers.

#### **Targeted Audience:**

Personnel and Contractors at The Strafford County Complex.

#### **Responsible Department/Parties:**

The Strafford County Complex

#### **Measurable Goal(s):**

Personnel and Contractors at the Strafford County Complex are aware of best practices for grass and fertilizer. Strafford County Complex reportedly did not use fertilizers *during this reporting period*.

#### **Goal was achieved.**

#### **Message Date:** Year-round

### BMP: Pet Waste Disposal

#### **Outreach Resources:**

Pet waste related flyers, mailers, postcards, and videos found on the [MCM #1 webpage](#) of the NH MS4 website.

<https://www.dover.nh.gov/government/city-operations/community-services/environmental/pet-waste/>

**Description:**

A link to the City of Dover's Pet Waste initiative is posted on the Strafford County's website. The initiative provides information as to why pet waste is a problem and recommendation for how to manage pet waste.

An email on the Pet Waste initiative was sent out to all Strafford County Complex staff.

**Targeted Audience:**

Facility's management personnel and visitors to the complex.

**Responsible Department/Parties:**

Strafford County Complex

**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.

Approximately 2,000 website views ***during this reporting period.***

**Goal was achieved.**

**Message Date:** Year-round message via the Strafford County Stormwater Management website.

## **BMP: Disposal of Leaf and Grass Clippings**

**Outreach Resources:**

Leaf and grass clippings related flyers, brochures, pledges, door hangers, and videos found on the [MCM #1 webpage](#) of the NH MS4 website.

**Description:**

Strafford County Stormwater Management website links to the NH MS4 website which fofers relevant information for homeowners about yard waste.

**Targeted Audience:**

Personnel and Contractors at the Strafford County Complex.

**Responsible Department/Parties:**

Strafford County Complex.

**Measurable Goal(s):**

Personnel and Contractors at the Strafford County Complex are aware of best practices for lead and grass clipping management.

**Goal was achieved.**

**Message Date:** Year-round

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

The Complex contracted a hay bailer during Permit Year 5. The company worked to cut and prepare fields for Year 6. During Year 6, the company worked to spread manure among the fields.

## 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 Strafford County Complex 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 reviewed on the Strafford County Complex website. Documents and records relating to the permit are retained and available for 5 years to the public at <https://www.dover.nh.gov/government/city-operations/community-services/environmental/pet-waste/>.

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

No.

Yes. The Strafford County Complex made the following changes: N/A

**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 ancillary to daily operations.

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 DO NOT have sanitary sewer.
- This SSO section is NOT applicable because we DID NOT find any new SSOs.
- The SSO inventory has been updated, including the status of mitigation and corrective measures implemented or was addressed and can be found in submission.

*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:

Phase 1 map of storm sewer system and associated outfalls was completed in Year 2 and there have been no updates since that time.

Map of storm sewer system and associated outfalls was updated in Year(s) 5 and there were no updates in Year 6.

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

Percent of Phase 2 map completed: 70% as of June 30, 2024.

Provide additional status information regarding your map:

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***.
- Outfalls were inspected for dry weather screening ***during this report period*** and data can be found in submission.

*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)***: 0%

## 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.
- Catchment investigations were conducted, and data can be found in submission.

Number of catchment investigations ***during this reporting period***: 0. Catchment Investigations were conducted as outlined in Part [2.3.4.8.](#) of the permit and include investigations associated with Problem, High Priority, and Low Priority Outfalls and Interconnections within the MS4 regulated area.

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

## IDDE Progress

- No illicit discharges were found ***during this reporting period***.
- Illicit discharges were found but not removed ***during this reporting period***. N/A

Illicit discharges were removed ***during this reporting period*** and the illicit discharges removal report can be found in submission.

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)***: 0

Total number of illicit discharges removed ***since the effective date of the permit (July 1, 2018 – June 30, 2024)***: 0

## Employee Training

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

Strafford County Complex held an IDDE training session for municipal staff during Fall 2023. In addition, Strafford County Complex routinely provides IDDE materials and training, including information on how to identify illicit discharges and SSOs are made available to applicable employees in accordance with IDDE Program Plan. Training logs are included in Appendix F of the IDDE Program Plan.

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

N/A

## 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***: N/A

Number of inspections completed ***during this reporting period***: N/A

Number of enforcement actions taken ***during this reporting period***: N/A

Strafford County Complex 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:

N/A

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

## Ordinance or Regulatory Mechanism

- The Stafford County Complex has a regulatory mechanism(s) consistent with permit requirements.
  - Date regulatory mechanism(s) was adopted: prior to July 1, 2021.
- The Stafford County Complex has not drafted **or** adopted a regulatory mechanism(s) consistent with permit requirements. N/A.

## As-built Drawings

Number of as-built drawings received ***during this reporting period***: 0

## Street Design and Parking Lots Report

- The **Assessment Report** was evaluated and no updates were recommended ***during this reporting period***.
- The **Assessment Report** was evaluated and updates were recommended ***during this reporting period***. Following are the recommended updates: The Stafford County Complex to note recommended or planned changes here. The anticipated date of completion for updates is N/A.
- 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 and/or Guidelines during this reporting period**.
- Updates were recommended **and/or** planned to be made to **Local Regulations and/or Guidelines during this reporting period**. Following are the recommended updates: The Stafford County Complex to note recommended or planned updates here. The anticipated date of completion for updates is N/A.
- No updates were made ***during this reporting period*** because all required **Local Regulation and/or Guideline** updates have been made to make low impact designs allowable as outlined in the Local Regulations Assessment Report.

## Green Infrastructure Reports

- The **Assessment Report** was evaluated and no updates were recommended ***during this reporting period***.

- The **Assessment Report** was evaluated and updates were recommended ***during this reporting period***. Following are the recommended updates: The Strafford County Complex to note recommended or planned changes here. The anticipated date of completion for updates is N/A.
- 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 or planned to be made to **Local Regulations *during this reporting period***.
- Updates were made to the **Local Regulations *during this reporting period***. The Strafford County Complex has made progress on Green Roofs, Infiltration Practices, **and/or** Water Harvesting. Progress includes updating the ordinance, regulation **and/or** code.
- 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

- Non-traditional MS4s do not need to meet the requirements of Part 2.3.6.c and Part 2.3.6.d; therefore, the following questions are not applicable. The Strafford County Complex evaluated opportunities to include green infrastructure practices in new development and redevelopment at their facilities and to reduce the amount of impervious cover due to parking areas and walkways. New development and/or redevelopment opportunities were not applicable in Year 6 and will be considered in the future. At this time, reductions in impervious cover were not available.
- The Strafford County Complex 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: N/A
  - List of Non-MS4 Properties: N/A
- The Strafford County Complex has modified or retrofitted the following MS4 **and/or** Non-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: N/A
  - 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:

N/A

## 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: N/A
  - 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:*** 38

Number of catch basins cleaned ***during this reporting period:*** 24

Total volume **or** mass of material removed from **all** catch basins ***during this reporting period:*** 3 cubic yards.

Total number of catch basins within the MS4 system: 38

### 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:*** 1

Volume of swept material ***during this reporting period:*** 3 cubic yards

Mass of swept material ***during this reporting period:*** N/A

### Stormwater Pollution Prevention Plan (SWPPP)

The Strafford County Complex 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:*** 4 (quarterly)

Number of corrective actions taken ***during this reporting period:*** 3

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

No corrective actions necessary.

## 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:

In September 2023, two culverts were replaced, and one culvert was removed. The culvert replacement occurred along County Pond Crossroad, approximately 15 feet of culvert was replaced. During Permit Year 6, two catch basins were repaired on in April 2024. During the Bi-Annual retention basin clean-up (March and June 2023), the Strafford County Complex performed maintenance in and around the retention basin. Maintenance work included removing sticks, logs, and trash debris.

## 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.***
- Non-Traditional MS4 Not Applicable*** - 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 **does not** have a chloride impairment.
- Permittee **has** a chloride impairment.
  - Fully implemented Salt Reduction Plan which can be found in submission.

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 in submission. 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.
- Permittee **has** a nitrogen impairment.
  - Distributed an annual message that encourages the proper use and disposal of grass clippings and encourages the proper use of slow-release fertilizers **during this reporting period**.
  - Distributed an annual message encouraging the proper management of pet waste, including noting any existing ordinances where appropriate **during this reporting period**.
  - Distributed an annual message encouraging the proper disposal of leaf litter **during this reporting period**.
  - Increased street sweeping frequency of all municipal owned streets and parking lots subject to Permit part 2.3.7.d.iii to a minimum of two times per year (spring and fall) **during this reporting period**.
  - Increased street sweeping frequency of all municipal owned streets and parking lots subject to Permit part 2.3.7.d.iii to a minimum of one time per year (spring) and implemented a fall leaf litter collection program in lieu of post-drop street sweeping **during this reporting period**.

### Nitrogen Source Identification Report- Update

#### Structural BMPs

- The Nitrogen Source Identification Report was reviewed and there were no updates required **during this reporting period** because there were no revisions. The Nitrogen Source Identification Report can be found in submission.
- The Nitrogen Source Identification Report was **updated during this reporting period** and can be found in submission. An updated list of the planned structural BMPs and a plan and schedule for implementation can be found in *Section 2: Potential Structural BMPs Report (Year 5) part I.1.c.ii* of the Nitrogen Source Identification Report.
- The Strafford County Complex has **not** installed a minimum of one structural BMP(s) as a demonstration project within the drainage area of the water quality limited water or its tributaries **by the end of this reporting period**.
- The Strafford County Complex has installed a minimum of one structural BMP(s) as a demonstration project within the drainage area of the water quality limited water or its tributaries, **but the structural BMP was installed after the end of this reporting period**. Information regarding the installed BMP(s) can be found in *Section 2: Potential Structural BMPs Report (Year 5) in Part I.1.c.iii* of the Nitrogen Source Identification Report.

- The Strafford County Complex has installed a minimum of one structural BMP(s) as a demonstration project within the drainage area of the water quality limited water or its tributaries **by the end of this reporting period**. Information regarding the installed BMP(s) can be found in *Section 2: Potential Structural BMPs Report (Year 5) in Part I.1.c.iii* of the Nitrogen Source Identification Report.
- Structural BMP(s) listed in Attachment 3 to Appendix F already existing or installed in the regulated area by The Strafford County Complex or its agents was tracked and the nitrogen removal by the BMP(s) was estimated consistent with Attachment 3 to Appendix F. The BMP(s) type, total area treated by the BMP(s), the design storage volume of the BMP(s), and the estimated nitrogen removed in mass per year by the BMP(s) were documented in **PTAP 2024 Nutrient Reduction Report** in submission. The total estimated nitrogen removed from the installed BMP(s) is 0 lbs/year.

The Strafford County Complex is utilizing the Pollutant Tracking and Account Project, better known as PTAP, to track nutrient reductions associated with stormwater structural and 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 Strafford County Complex 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 BMP(s) listed in Attachment 3 to Appendix F already existing or installed in the regulated area by The Strafford County Complex or its agents was tracked and the nitrogen removal by the BMP(s) was estimated consistent with Attachment 3 to Appendix F. The BMP(s) type, total area treated by the BMP(s), the design storage volume of the BMP(s), and the estimated nitrogen removed in mass per year by the BMP(s) were documented in **The Strafford County Complex Tracking Program** in submission. The total estimated nitrogen removed from the installed BMP(s) is 0 lbs/year.
- No BMPs were installed **during this reporting period**. The implementation schedule is outlined in *Section 2: Potential Structural BMPs Report (Year 5) in Part I.1.c.i* of the Nitrogen Source Identification Report. The total estimated nitrogen removed from the installed BMP(s) is 0 lbs/year.

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

N/A
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## Phosphorus Impairment (Appendix H)

- Permittee **does not** have a phosphorus impairment.
- Permittee **has** a phosphorus impairment.
  - Distributed an annual message that encourages the proper use and disposal of grass clippings and encourages the proper use of slow-release fertilizers ***during this reporting period.***
  - Distributed an annual message encouraging the proper management of pet waste, including noting any existing ordinances where appropriate ***during this reporting period.***
  - Distributed an annual message encouraging the proper disposal of leaf litter ***during this reporting period.***
  - Increased street sweeping frequency of all municipal owned streets and parking lots subject to Permit part 2.3.7.d.iii to a minimum of two times per year (spring and fall) ***during this reporting period.***
  - Increased street sweeping frequency of all municipal owned streets and parking lots subject to Permit part 2.3.7.d.iii to a minimum of one time per year (spring) and implemented a fall leaf litter collection program in lieu of post-drop street sweeping ***during this reporting period.***

## Phosphorus Source Identification Report- Update

### Structural BMPs

- The Phosphorus Source Identification Report was reviewed and there were no updates required ***during this reporting period*** because there were no revisions. The Phosphorus Source Identification Report can be found in submission.
- The Phosphorus Source Identification Report was ***updated during this reporting period*** and can be found in submission. An updated list of the planned structural BMPs and a plan and schedule for implementation can be found in *Section 2: Potential Structural BMPs Report (Year 5) part II.1.c.ii* of the Phosphorus Source Identification Report.
- The Strafford County Complex has **not** installed a minimum of one structural BMP(s) as a demonstration project within the drainage area of the water quality limited water or its tributaries ***by the end of this reporting period.***
- The Strafford County Complex has installed a minimum of one structural BMP(s) as a demonstration project within the drainage area of the water quality limited water or its tributaries, ***but the structural BMP was installed after the end of this reporting period.***

Information regarding the installed BMP(s) can be found in *Section 2: Potential Structural BMPs Report (Year 5) in Part II.1.c.iii* of the Phosphorus Source Identification Report.

- The Strafford County Complex has installed a minimum of one structural BMP(s) as a demonstration project within the drainage area of the water quality limited water or its tributaries **by the end of this reporting period**. Information regarding the installed BMP(s) can be found in *Section 2: Potential Structural BMPs Report (Year 5) in Part II.1.c.iii* of the Phosphorus Source Identification Report.
- Structural BMP(s) listed in Attachment 3 to Appendix F already existing or installed in the regulated area by The Strafford County Complex or its agents was tracked and the phosphorus removal by the BMP(s) was estimated consistent with Attachment 3 to Appendix F. The BMP(s) type, total area treated by the BMP(s), the design storage volume of the BMP(s), and the estimated phosphorus removed in mass per year by the BMP(s) were documented in **PTAP 2024 Nutrient Reduction Report** in submission. The total estimated phosphorus removed from the installed BMP(s) is 0 lbs/year.

The Strafford County Complex is utilizing the Pollutant Tracking and Account Project, better known as PTAP, to track nutrient reductions associated with stormwater structural and 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 Strafford County Complex 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 BMP(s) listed in Attachment 3 to Appendix F already existing or installed in the regulated area by The Strafford County Complex or its agents was tracked and the phosphorus removal by the BMP(s) was estimated consistent with Attachment 3 to Appendix F. The BMP(s) type, total area treated by the BMP(s), the design storage volume of the BMP(s), and the estimated phosphorus removed in mass per year by the BMP(s) were documented in **The Strafford County Complex Tracking Program** in submission. The total estimated phosphorus removed from the installed BMP(s) is 0 lbs/year.
- No BMPs were installed **during this reporting period**. The implementation schedule is outlined in *Section 2: Potential Structural BMPs Report (Year 5) in Part II.1.c.i* of the Phosphorus Source Identification Report. The total estimated phosphorus removed from the installed BMP(s) is 0 lbs/year.

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

N/A

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

- Permittee **does not** have a solids, oil and grease, or metals impairment(s).
- 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 Strafford County Complex street sweeping schedule can be found in submission.

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

N/A

## Chloride TMDL (Appendix F)

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

Permittee **has** a chloride TMDL.

Fully implemented Chloride Reduction Plan which can be found in submission.

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, submitting it to NHDES, and can be found in submission. 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

## Lake and Pond Phosphorus TMDL (Appendix F)

- Permittee **does not** have a lake and pond phosphorus TMDL.
- Permittee **has** a lake and pond phosphorus TMDL.

### Year 5 Lake Phosphorus Control Plan Reporting Requirements

- The Strafford County Complex has **not fully completed the Year 5 requirements** of the written Lake Phosphorus Control Plan ***during this reporting period***. The partially completed plan can be found in submission. The Strafford County Complex has completed the following sections of the written Lake Phosphorus Control Plan ***during this reporting period***:
  - 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
- The Strafford County Complex **completed** a written Lake Phosphorus Control Plan ***during the Year 5 reporting period*** and was reported in the The Strafford County Complex Year 5 Annual Report. The completed plan can be found in submission. 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
- The Strafford County Complex **completed** a written Lake Phosphorus Control Plan ***during this reporting period***. The Strafford County Complex 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 in submission. 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

## Year 6 Lake Phosphorus Control Plan Reporting Requirements

Total phosphorus reduction from all implemented nonstructural controls **during this reporting period** (lbs/year) [B]: 0 lbs/year

Total phosphorus reduction from all structural controls installed **during this reporting period and all previous years** (lbs/year) [C]: 0

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

The Strafford County Complex 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 Strafford County Complex will provide an update on the progress in the Year 7 Annual Report.

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

Current phosphorus export rate from the LPCP Area in lbs/year [=A-(B+C)+D from above]: 0

### Non-Structural Controls

- The Strafford County Complex has **not** implemented all selected Lake Phosphorus Control Plan **non-structural control measure(s) during this reporting period** and has **not** documented the measure(s) and their phosphorus reductions. The non-structural control measure(s) that have been implemented are recorded within the The Strafford County Complex's written Lake Phosphorus Control Plan which can be found in submission.

### Structural Controls

- The Strafford County Complex has **not** installed any **structural control measure(s)** within the Lake Phosphorus Control Plan area **during this reporting period or during previous reporting periods**. Therefore The Strafford County Complex has not documented the location, phosphorus reduction in mass/year, and date of last completed maintenance and inspection for each installed control within the written Lake Phosphorus Control Plan.

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

N/A

# 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.
- The results from additional reports or studies are in submission.

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:

N/A

## Description of Any Changes in Identified BMPs or Measurable Goals

The Strafford County Complex 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 Stafford County Complex will continue to implement activities in accordance with the permit and SWMP.