

# **Year 7 Annual Report**

**New Hampshire Small MS4 General Permit**

**EXISTING PERMITTEES**

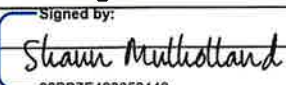
**Reporting Period: July 1, 2024 - June 30, 2025**

**Londonderry**

EPA NPDES Permit Number NHR041016

## Certification of Small MS4 Year 7 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: Shaun Mulholland	
Title: Town Manager	
Signature: 	Date: 9/25/2025

### Authorized Representative:

The authorization letter is:

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

☐ Publicly available at the website:

### Primary MS4 Program Manager Contact Information:

Name: John R. Trottier, PE	Title/Position: Director of Engineering & Environmental Services	
Department: Engineering & Environmental Services		
Street Address: 268B Mammoth Road		
City: Londonderry	State: New Hampshire	Zip Code: 03053
Email: jrtrottier@londonderrynh.gov	Phone Number: 603-432-1100 x-146	

# 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, 2024, through June 30, 2025**, in accordance with the Permit.

*Please do not attach any documents to this form. Instead, attach all requested documents to an email when submitting the form. Also ensure that any websites included on this form are to publicly accessible sites and that links are correct and valid.*

*Unless otherwise noted, all fields are required to be filled out. If a field is left blank, it will be assumed the requirement or task has not been completed. Please **ONLY** report on activities between July 1, 2024 and June 30, 2025 unless otherwise requested.*

The Notice of Intent (NOI) can be found at the following (document name or web address):

<a href="https://www.epa.gov/npdes-permits/regulated-ms4-new-hampshire-communities">https://www.epa.gov/npdes-permits/regulated-ms4-new-hampshire-communities</a>
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Compliance activities have been identified and described in the Londonderry's Stormwater Management Program Plan (SWMP) and Illicit Discharge Detection and Elimination (IDDE) Plan. Those documents and other pertinent Year 7 information can be found in submission or at the following websites, and will be referred to throughout this report:

SWMP: <a href="https://www.londonderrynh.gov/DocumentCenter/View/290/Stormwater-Management-Plan---Posted-Sept-24-2020-PDF">/https://www.londonderrynh.gov/DocumentCenter/View/290/Stormwater-Management-Plan---Posted-Sept-24-2020-PDF</a>
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Date SWMP was Last Updated: A draft version of August 2022 is currently under review
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IDDE Program Plan: Located in SWMP above as Appendix E.
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Updated System Map: See attached updated plan showing outfalls.
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Updated SSO Inventory: No SSO's have occurred
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Updated Inventory and Ranking of Outfalls/Interconnections with System Vulnerability Factors: An updated inventory and ranking has not been completed at this time.
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Dry Weather Screening Data: None conducted during the reporting period.
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Wet Weather Screening Data: See Attached.
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Catchment Investigation Data: None conducted during the reporting period.
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Illicit Discharge Removal Report: See attached for 1 illicit wet weather discharge location. Investigation for removal has not occurred in the reporting period due to lack of rainfall.
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Results from additional stormwater or receiving water quality monitoring reports or studies: None
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PTAP 2025 Nutrient Reduction Report: N/A
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Salt Reduction Plan: See attached <a href="#">Salt-Reduction-Plan---updated-July-2022-PDF</a>
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Annual Salt Usage Report: See attached submission
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Updated Nitrogen Source Identification Report: N/A
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PTAP 2025 Nutrient Reduction Report: N/A
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Londonderry Nutrient Tracking Program Report: N/A
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Updated Phosphorus Source Identification Report: N/A
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PTAP 2025 Nutrient Reduction Report: N/A
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Londonderry Nutrient Tracking Program Report: N/A
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Street Sweeping Schedule: See BMP 6F
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Chloride Reduction Plan: See attached "Londonderry_spr_final_with_appendices_07-16-10_- _updated_july_26_2022" submission.
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Annual Salt Usage Report: See attached submission
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Lake Phosphorus Control Plan N/A
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PTAP 2025 Nutrient Reduction Report: N/A
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Londonderry Nutrient Tracking Program Report N/A
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# 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 7 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.

Impairment(s)		
<input 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 type="checkbox"/> Bacteria and Pathogens	<input checked="" 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: See below

TMDL:

☐ 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 159 outfall(s) have been removed.

☐ No

Londonderry 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:

Based upon the 2018 303(d) reporting, the Solids/Oil/Grease have been removed from Little Cohas Brook NHRIV700060703-05.

Based upon the 2018 303(d) reporting, the chloride listing for Kendall Pond (NHLAK700061203-04) has remained improved.

The dry weather sampling conducted during the previous reporting year resulted in a reduction in the number of outfalls initially reported in the NOI from 489 to 330.

# Minimum Control Measures

## MCM 1: Public Education

Total number of all MS4 related educational efforts completed **during this reporting period**: 397

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

☒ No.

### BMP 1A: Pet Waste Disposal

#### Outreach Resources:

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

Pet waste related flyers found on the Londonderry Stormwater Information page:

<https://www.londonderrynh.gov/203/Stormwater-Information>

"Pet Waste" flyer:

<https://www.londonderrynh.gov/DocumentCenter/View/1674/Pet-Waste---posted-June-13-2025>

#### Description:

Distribution and promotion of "Please, Scoop the Poop" flyer stating the problem with dog waste, highlighting the benefit of cleaning up and properly disposing of dog waste, and encouraging dog owners to voluntarily clean up after their dog.

Continued Distribution and promotion of previous "Dog Waste and Surface Water Quality " flyer, "Pet Waste and Water Quality" flyer, "Pick up after your pet" flyer

#### Targeted Audience:

Residents - Pet Owners

#### Responsible Department/Parties:

Engineering and Environmental Services

#### Measurable Goal(s):

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

Following is the number of residents that obtained flyers, brochures or postcards that were distributed **during this reporting period**:

Year 7 = 26

**Goal was achieved.**

**Message Date:** June, 13, 2025 (latest), previously April 17, 2024, previously September 16, 2021), & June 20, 2019 and ongoing

## **BMP 1B: 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.

“Green Grass & Clear Water Brochure” and “Stormwater Pollution Education: Fertilizing the Lawn” and Lawn Care within the Protected Shoreland (July 2022) flyers found on the Londonderry Stormwater Information page:

<https://www.londonderrynh.gov/203/Stormwater-Information>

“EPA Lawn Care” flyer:

<https://www.londonderrynh.gov/DocumentCenter/View/1675/EPA-Lawn-Care--Posted-June-13-2025>

### **Description:**

Distribution and promotion of flyers and social media posts produced by UNH Cooperative Extension, NH Sea Grant, and NHDES outlining simple recommendations to keep lawns healthy while reducing water quality impacts - including proper fertilizer techniques and disposal of grass clippings.

### **Targeted Audience:**

Residential and/or Business and Institutions

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

Engineering and Environmental Services

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

Residents that are lawn care enthusiasts 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 quantity of materials distributed.

Following are the number of flyers, mailers, or postcards that were distributed **during this reporting period:**

Year 7 = 18

**Goal was achieved.**

**Message Date:** June 13, 2025 (latest), July 2022 and June 20, 2019 and ongoing.



## BMP 1C: Septic System Maintenance

### Outreach Resources:

Septic system related brochures, letters, videos, **and/or** social media posts found on the [MCM #1 webpage](#) of the NH MS4 website.

“Do your Part – Be Septic Smart” Flyer and “get Pumped (septic systems) brochure found on the Londonderry Stormwater Information page:  
<https://www.londonderrynh.gov/203/Stormwater-Information>

### Description:

Distribute and promote brochure, for proper care and maintenance of the septic system directing and educating New Hampshire homeowners with septic systems on how to identify, locate and maintain those systems.

Continued distribution and promotion of previous “Get Pumped (Septic System)” brochure.

### Targeted Audience:

Septic System Owners

### Responsible Department/Parties:

Engineering and Environmental Services

### Measurable Goal(s):

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

Following are the number of flyers, brochures, and letters that were distributed **during this reporting period:**

Year 7 =	15 - “Get Pumped NH” brochures
	12 – “Get Pumped” magnets
	2 - “What’s flushable” brochures
	7 - “Do your part- Be Septic Smart” brochures

**Goal was achieved.**

**Message Date:** September 20, 2021 (latest), previously Sept 23, 2019, and ongoing

## **BMP1D: Rake it or Leave it (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.

“Rake it or leave it” flyer and “Leaf Litter - Proper Disposal Options” flyer found on the Londonderry Stormwater Information page:

<https://www.londonderrynh.gov/203/Stormwater-Information>

### **Description:**

Distribute and promote informational flyer with messaging about impacts from yard waste to waterbodies, alternatives to dumping yard waste and laws against dumping yard waste near or in waterbodies.

### **Targeted Audience:**

Residential **and/or** Business and Institutions

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

Engineering and Environmental Services

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

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

Following are the number of flyers that were distributed **during this reporting period:**

Year 7 = 1

### **Goal was achieved.**

**Message Date:** Fall - October 2022 (Latest) and November 5, 2019, BMPs placed on website and ongoing.

## **BMP 1E: Stormwater Pollution for Industrial Facilities (renamed from NOI)**

### **Outreach Resources:**

Industrial facilities related letter and fact sheets found on the [MCM #1 webpage](#) of the NH MS4 website.

“Stormwater Pollution for Industrial Facilities” Fact Sheet found on the Londonderry Stormwater Information page:

<https://www.londonderrynh.gov/203/Stormwater-Information>

**Description:**

Distribute stormwater fact sheet to industrial facilities located within MS4 or municipal boundaries to explain best management practices related to maintenance of parking lots, spill prevention, storage of industrial materials, and winter maintenance. Industrial facility operators were also made aware that they fall under the EPA Multi-Sector General Permit (MSGP) and must meet those requirements as well.

**Targeted Audience:**

Industrial Facilities and/or Business and Institutions

**Responsible Department/ Parties:**

Engineering and Environmental Services

**Measurable Goal(s):**

Industrial facility operators are aware of the need for proper stormwater best management practices within their facilities and requirements under the EPA Multi-Sector General Permit (MSGP) and the Town's Stormwater Regulations relative to winter maintenance.

Following is the number of flyers that were distributed *during this reporting period*:

Year 7 = 0

**Goal was achieved.**

**Message Date:** October 2023 (latest) and Sept 20, 2021 and ongoing

**BMP 1F: Construction/Developers Outreach****Outreach Resources:**

Industrial facilities related letter and fact sheets found on the [MCM #1 webpage](#) of the NH MS4 website.

"Stormwater and the Construction Industry" Fact Sheet and "What You Can Do as a Developer" EPA outreach page found on the Londonderry Stormwater Information page:

<https://www.londonderrynh.gov/203/Stormwater-Information>

**Description:**

- ☒ Provide the Construction General Permit (CGP) outreach letter and fact sheets to developers, construction contractors, and other municipal or local organizations to educate them on the EPA 2022 Construction General Permit along with information on the selection, installation, and maintenance of construction related best management practices.

**Targeted Audience:**

Construction/Developers

**Responsible Department/Parties:**

Engineering and Environmental Services

**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 of brochures that were distributed to contractors, developers, and municipal or local organizations *during this reporting period*:

Year 7 = 0

The Town of Londonderry held 13 pre-construction meetings, representing ~ 81% of projects that received planning board approval and began construction *during this reporting period*.

**Goal was achieved.**

**Message Date:** October 2023 (latest) and September 2022

## **BMP 1G: Storm Water Business - The Drain is Just for Rain**

**Outreach Resources:**

“Storm Water Business – The drain is Just for Rain” Fact Sheet:

[https://www.londonderrynh.org/sites/g/files/vyhlf4616/f/uploads/stormwater\\_business\\_-\\_sept\\_17\\_2021\\_0.pdf](https://www.londonderrynh.org/sites/g/files/vyhlf4616/f/uploads/stormwater_business_-_sept_17_2021_0.pdf)

Continued distribution and promotion of previous “Stormwater – What you can do as a Citizen” flyer found on the Londonderry Stormwater Information page:

<https://www.londonderrynh.gov/203/Stormwater-Information>

**Description:**

Distribute and promotion of stormwater fact sheet to citizens and business facilities located within MS4 or municipal boundaries to explain best management practices related to maintenance of parking lots, spill prevention, storage of waste materials, and winter maintenance.

**Targeted Audience:**

Residential &/or Business and Institutions

**Responsible Department/ Parties:**

Engineering and Environmental Services

**Measurable Goal(s):**

Business and Institution facility operators are aware of the need for proper stormwater best management practices within their facilities and requirements under the Town's Stormwater regulations.

Following is the number of flyers that were distributed ***during this reporting period:***

Year 7 = 316

**Goal was achieved.**

**Message Date:** Sept 20, 2021 (latest,), June 20, 2019 and ongoing

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

Public involvement or participation opportunities are ancillary to daily operations.

## MCM 2: Public Participation

### **BMP 2A: Public Review of Stormwater Management Plan**

**Description:**

The Stormwater Management Program (SWMP) was updated in September 2022 (Draft document under review) and will be available for public review at the Town of Londonderry Department of Engineering and Environmental Services at the Town offices during normal business hours. The previous SWMP document was made available in Year 3 and can be publicly reviewed at the following web address:

<https://www.londonderrynh.gov/DocumentCenter/View/290/Stormwater-Management-Plan---Posted-Sept-24-2020-PDF>

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

☒ No

☐ Yes. Londonderry made the following changes:

**Measurable Goal(s):**

Allow public review of Stormwater Management Plan

**Goal was achieved.**

### **BMP 2B: Public Participation in Stormwater Management Program**

- ☒ Provided an opportunity for public participation in review and implementation of SWMP and complied with State Public Notice requirements as described in the Londonderry SWMP.
- ☒ Kept records relating to the permit available 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 for review at the Town Hall in addition to the web address noted above. Documents and records relating to the permit are retained and available for 5 years to the public at Town Hall.

**Measurable Goal(s):**

No Public Input was received, and records are maintained.

**Goal was achieved.**

## **BMP 2C: Annual Household Hazardous Waste & Monthly Used Oil Collection Events**

### **Outreach Resources:**

<https://www.londonderrynh.gov/220/Environmental-Services---Solid-Waste>

### **Description:**

Hold annual Household Hazardous Waste (HHW) Collection Event in November each year for the residents of Londonderry and Derry. The Town of Derry sponsored a separate event in May this year for residents of both towns. The event allows residents of each town to dispose of household hazardous waste legally and properly from their home. The event is also used to spread outreach materials directly to residents. Outreach brochures promoting health and safety and HHW reduction typically include:

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

The Town of Londonderry provided monthly used oil collection dates. The dates of the collection were posted on the Department of Engineering and Environmental Services website.

As a result of dwindling number of participants, volunteer, average age of remaining volunteers are over 70 years old, etc. the Town of Londonderry (TOL) no longer provides monthly used oil collection dates. The TOL has identified several auto supply vendors in Town that will accept waste oil and other appropriate fluids during normal business hours 6 to 7 days per week (vs. 2 hours on a Saturday a total of 10 times per year. The locations of the auto supply vendors are posted on the Department of Engineering & Environmental Services website: <https://www.londonderrynh.gov/229/Trash-and-Recycling>

**Targeted Audience:** Residents

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

Conducted Household Hazardous Waste Collection on Nov 23, 2024 and May 3, 2025

Conducted Used Oil Collections on: 8/3/24, 9/7/24, 10/5/24, 11/2/24, 11/23/24, 12/4/24, 5/3/25

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

Virtual Partnership with the City of Manchester occurred during the report period. Partnership with the Manchester Airport has not begun.

Recent coordination with the Manchester Airport has occurred in year 5 with a municipal roadway reconstruction project occurring adjacent to the Airport. Verbal dialogue continues relative to the Town of Londonderry happenings.

#### **BMP 2E: Partnership – Advocacy Groups**

Virtual and in-person partnership meetings occurred during the reporting period. Continuation is anticipated to occur in the following year (year 8) in accordance with the accepted NOI.

#### **BMP 2F: Partnership with NHDOT**

NHDOT no longer participates in the Lower Merrimack Valley Stormwater Coalition. Resumption of meetings with NHDOT has occurred relative to the development of I-93, Exit 4A located in the Town's MS4 area.

#### **BMP 2G: Cleanups – Roadside/General**

"Beautify Londonderry 2025" roadside cleanup program occurred on May 17, 2025. In addition, roadside cleanup events sponsored by others occurred on October 17, 2024 and November 18, 2024.

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

Public involvement or participation opportunities are ancillary to daily operations.
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## MCM 3: Illicit Discharge Detection and Elimination (IDDE)

### BMP 3B: IDDE Progress

- ☐ No illicit discharges were found *during this reporting period*.
- ☒ Illicit discharges were found but not removed *during this reporting period*.
- ☐ Illicit discharges were removed *during this reporting period* and the illicit discharges removal report can be found attached to this submission.

Number of illicit discharges identified *during this reporting period*: 1

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, 2025)*: 8

Total number of illicit discharges removed *since the effective date of the permit (July 1, 2018 – June 30, 2025)*: 7

Describe any additional details regarding illicit discharge requirements, in the box below:

Wet weather sampling was initiated in year 7 with two rounds of sampling occurring at 12 locations. One location sampled on 6/11/2025 indicated elevated e-coli readings, but a follow-up catchment investigation could not be conducted due to the lack of rain prior to the end of the reporting period.

### BMP 3C: 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 **and/or** at the following website

*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

### BMP 3D: MS4 System Mapping

- ☐ MS4 System Map was updated **during this reporting period:**

Percent of Phase 1 elements incorporated into MS4 System Map: ~75 percent of Phase 1 system mapping completed as of June 30, 2025.

Percent of Phase 2 elements incorporated into MS4 System Map: ~60 Percent of Phase 2 system mapping completed as of June 30, 2025.

- ☒ MS4 System Map was updated in Year(s) 4 and there were no updates in Year 7.

- ☐ Londonderry's MS4 System Map is continually updated to incorporate findings and changes from catchment investigations.

Describe any additional details regarding phase 1 and phase 2 MS4 System Mapping requirements, in the box below:

Due to lack of staff and workload priorities, updated to the phase 1 and phase 2 MS4 System Mapping has not occurred.

### BMP 3D: Screening of Outfalls/Interconnections

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

- ☒ Wet weather outfall screening data can be found in the submission.

### BMP 3E: 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 7):** 100%

The inventory and ranking of outfalls/interconnections was not updated during Year 7 because the Town is currently determining the updated number of outfalls based upon the latest ruling for "Waters of the United States".

### BMP 3F: Wet Weather Screening

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

☒ Wet weather outfall/interconnection screening data can be found in submission

**Number** of outfalls screened *during this reporting period*: 12

**Percent** of total known outfalls/interconnections screened *to date (Year 1 – Year 7)*: ~3

### BMP 3F: Wet Weather 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)*: 1%

Describe any additional details regarding catchment investigations requirements, in the box below:

Initial wet weather sampling discovered one high e-coli site, but due to the lack of rain, follow-up catchment investigations could not be conducted before the end of the reporting period. Londonderry has not completed catchment investigations for all problem outfalls and has not conducted any investigations because of lack of staff.

### BMP 3G: Employee Training

☐ Provided training to employees involved in IDDE program *during this reporting period*: NO  
Londonderry staff were trained using IDDE training videos or written IDDE SOP.

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

Due to lack of staff and workload priorities, training was not performed. Training to be performed in Fall / Winter 2025.

## 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*: 61

Number of inspections completed *during this reporting period*: 693

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

Londonderry 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:

A written site inspection and enforcement program for erosion and sediment control measures is currently in draft development.

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

### Local Regulations Assessment 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: Londonderry should update the subdivision and site plan regulations to include the recent updates to the stormwater regulations. The anticipated date of completion for updates is 2026.
- ☐ 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**.

### BMP 5A: As-built Drawings

Number of as-built drawings received *during this reporting period*: 10

### BMP 5B: Retrofit Properties Inventory

- ☒ Londonderry 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:

268 C Mammoth Rd
17 Sargent Rd
94 West Rd
120 High Range Rd
102 West Rd
58 Old Derry Rd
13 Recovery Way
17 Young Rd
49 Hovey Rd
20 Grenier Field Rd
256 Mammoth Rd
535 A Mammoth Rd

List of Non-MS4 Properties: 0

- ☐ Londonderry 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: ##List of permittee-owned properties within the MS4 regulated area that were modified or retrofitted along with the type of BMP implemented.

List of Non-MS4 Properties: ##List of permittee-owned properties outside the MS4 regulated area that were modified or retrofitted along with the type of BMP implemented.

## BMP 5C: Green Infrastructure

- ☒ No updates were made or planned to be made to Local Regulations regarding green infrastructure practices **during this reporting period**.
- ☐ Updates were recommended **and/or** planned to be made to **Local Regulations** regarding green infrastructure practices **during this reporting period**. Following are the recommended **and/or** planned updates: N/A. The anticipated date of completion for updates is N/A
- ☐ 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.

## BMP 5D: Street Design, Parking Lots, and Creation of Impervious Cover

- ☒ No updates were made or planned to be made to **Local Regulations and/or Guidelines** that affect the creation of impervious cover **during this reporting period**.

- ☐ Updates were recommended **and/or** planned to be made to **Local Regulations and/or Guidelines** that affect the creation of impervious cover **during this reporting period**. Following are the recommended updates: N/A 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.

**BMP 5E: Review Regulations to ensure any stormwater controls or management practices for new development and redevelopment meet the retention or treatment requirements of the permit.**

- ☐ No updates were recommended.
- ☒ Updates were recommended and completed by June 30, 2024 with the updates to the stormwater regulations and stormwater ordinance.

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

A written site inspection and enforcement program for erosion and sediment control measures draft is currently being developed.

The Town amended the Stormwater Ordinance and Stormwater Regulations on June 17, 2024. The Town is still progressing to incorporate the Ordinance and Regulations into updated Site and Subdivision Regulations. Recent staffing changes have delayed progress.

## MCM 6: Good Housekeeping

**BMP 6A: Permittee Owned Facilities Inventory**

All permittee owned facilities, including inventories, have been included with the appropriate BMPs and have been included in the 2022 DRAFT SWMP update. The facility inventories were completed during Year 3.

**BMPs 6B, 6C, 6D: O & M Programs and Procedures for Permittee-Owned Properties**

- ☒ O&M programs for all permittee owned facilities have been completed and/or updated as noted below:

O&M programs and procedures for all permittee owned facilities have been completed during Year 3 and have been included in the draft 2022 SWMP update. All maintenance procedures will be implemented 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 7.

### **BMP 6E: 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:

No actions were taken because no catch basin sumps were 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:** 2,500+/-

Number of catch basins cleaned **during this reporting period:** 2,000+/-

Total volume or mass of material removed from all catch basins **during this reporting period:** 400 CY+/-

Total number of catch basins within the MS4 system: 2,500+/-

### **BMP 6F: 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 **not** swept at least once **during this reporting period**. The development of a street sweeping program did not occur during the reporting period. In March 2024, the Town of Londonderry established and funded the Municipal Separate Storm Sewer System (MS4) expendable trust fund per RSA 31:19-a, to assist in funding the Town's obligations, as mandated by the Clean Water Act and other laws and / or regulations to develop and maintain a comprehensive stormwater management program.

With the establishment of the MS4 expendable trust fund, the Town of Londonderry was not able to prepare bid documents for street sweeping services in Year 7 and will in the Fall / Winter 2025 and commence a street sweeping program in the Spring 2026.

In anticipation of upcoming street sweeping activities and for budgeting purposes, an inventory of the Town of Londonderry streets has begun.

All curbed roadways were swept at least once **during this reporting period:** 0 See Above.

Number of (lane) miles swept **during this reporting period:** 0

Volume of swept material **during this reporting period:** 0

Mass of swept material **during this reporting period:** 0

### **BMP 6G: 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 7.

A review of all permittee-owned facilities was completed, and the inventory has been updated. The SWMP has been updated to reflect this and includes the following additional facilities: N/A.

☐ 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:

Due to lack of staff and workload priorities, site inspections of the Town owner facilities were not performed.

### **BMP 6H: Winter Road Maintenance Program**

☒ 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.



A winter road maintenance program has been established since 2003 with a goal of reducing salt usage. Salt reduction strategies have been implemented as outlined in our SWMP. All road salt storage piles are enclosed/covered to prevent runoff into storm drains and water bodies.

Londonderry has adopted a Salt Reduction Plan in accordance with Appendix H that has been implemented in the MS4 regulated area and/or community wide. The Londonderry Salt Reduction Plan can be found at: [Salt-Reduction-Plan---updated-July-2022-PDF](#)

## **BMP 6I: Stormwater Pollution Prevention Plan (SWPPP)**

Londonderry 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*: 0

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

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

No corrective actions necessary.

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

Londonderry made changes as noted below to the following BMPs and/or measurable goals that were outlined in the permit and identified in the SWMP. Stormwater Pollution for Industrial Facilities

- The Town has conducted catch basin inspection and cleaning, as needed, at all catch basins located in the MS4 area during the reporting period. The development of a form to log the catch basins cleaned and inspected including volume of material removed was developed and is currently under review and intended to be implemented now in year 7 (BMP 6E).
- The development of a street sweeping program did not occur during the reporting period. In March 2024, the Town of Londonderry established and funded the Municipal Separate Storm Sewer System (MS4) expendable trust fund per RSA 31:19-a, to assist in funding the Town's obligations, as mandated by the Clean Water Act and other laws and / or regulations to develop and maintain a comprehensive stormwater management program.

With the establishment of the MS4 expendable trust fund, the Town of Londonderry was not able to prepare bid documents for street sweeping services in year 7 and will for the Fall / Winter 2025 and commence a street sweeping program in the Spring 2026. (BMP 6F)

In anticipation of upcoming street sweeping activities and for budgeting purposes, an inventory of the Town of Londonderry curbed streets has begun.

## 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:

Not Applicable

#### Chloride Impairment (Appendix H)

- ☐ Permittee **does not** have a chloride impairment.
- ☒ Permittee **has** a chloride impairment.
  - ☒ Fully implemented Salt Reduction Plan *during this reporting period* which can be found at the following website : [Salt-Reduction-Plan---updated-July-2022-PDF](#).

Londonderry is certified under the Voluntary Municipal Green SnowPro Certification Program with the goal to reduce their winter salt application and to prevent increased concentrations of chlorides in their community's surface and ground waters.

- ☒ Reported amount of salt applied to all municipally-owned and maintained surfaces by completing the NHDES Annual Salt Usage reporting form and submitting it to NHDES. A copy of the reporting form is attached to this 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:

Not Applicable

## Nitrogen Impairment (Appendix H)

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

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

Not Applicable

## Phosphorus Impairment (Appendix H)

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

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

Not Applicable

## 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**. Londonderry street sweeping schedule can be found in submission **and/or** at 0

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

The development of a street sweeping program did not occur during the reporting period and was delayed. The Town currently does not conduct this specific activity town wide. The Town is still progressing and is currently developing a draft street sweeping program as noted in the NOI application (BMP 6F).

## 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 at the following website. [Salt-Reduction-Plan---updated-July-2022-PDF](#).

Londonderry is certified under the Voluntary Municipal Green SnowPro Certification Program with the goal to reduce their winter salt application and to prevent increased concentrations of chlorides in their community's surface and ground waters.

☒ Reported amount of salt applied to all municipally-owned and maintained surfaces by completing the NHDES 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:

Not Applicable.

## Lake and Pond Phosphorus TMDL (Appendix F)

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

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

Not Applicable.

# 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 **and/or** at the following website: N/A

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:

None
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## Description of Any Changes in Identified BMPs or Measurable Goals

Londonderry made changes as noted below to the following BMPs **and/or** measurable goals that were outlined in the permit and identified in the SWMP.

- Updates to the Town regulations relative to construction stormwater runoff under BMPs 4A-4C were not developed during the reporting period. The Town is still progressing to complete the updates to the regulations and incorporate the recently amended Stormwater Ordinance into the regulations (MCM 4).
- The stormwater ordinance and regulations have been updated relative to the post development requirements stormwater facilities outline in the permit and were amended on June 17, 2024 under BMP 5A during this reporting period. At this time, the Town is in the process of updating the site and subdivision regulations to reflect the recently amended stormwater ordinance and regulations and incorporate the checklist and recently amended Stormwater Ordinance into the regulations (MCM 5).
- As a result of dwindling number of participants, volunteer, average age of remaining volunteers are over 70 years old, etc. the Town of Londonderry (TOL) no longer provides monthly used oil collection dates. The TOL has identified several auto supply vendors in Town that will accept waste oil and other appropriate fluids during normal business hours 6 to 7 days per week (vs. 2 hours on a Saturday a total of 10 times per year. The locations of the auto supply vendors are posted on the Department of Engineering & Environmental Services website. (MCM 2 -BMP 2C)

## Activities Planned for Next Reporting Period

Londonderry will continue to implement activities in accordance with the permit and SWMP.