

MAY 05 2015

Municipality/Organization: TOWN OF PLAISTOW, NH

EPA NPDES Permit Number:

MassDEP Transmittal Number:

Annual Report Number
& Reporting Period:

Year 12
April 1, 2014 – March 31, 2015

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NPDES PII Small MS4 General Permit Annual Report (Due: May 1, 2015)

Part I. General Information

Contact Person: Sean Fitzgerald

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Certification:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, 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.

Signature:

Printed Name:

Title:

Date:


SEAN FITZGERALD
INTERIM TOWN MANAGER
May 1st 2015

Annual Report Contents:

1. Self assessment review of compliance with the permit conditions. **See Part II.**
2. An assessment of the appropriateness of the selected BMPs. **Several modifications to BMPs were made; see Part III.**
3. An assessment of the progress towards achieving the measurable goals. **See Part III.**
4. A summary of results of any information that has been collected and analyzed. **See Part IV.**
5. A discussion of activities for the next reporting cycle. **See Part III.**
6. A discussion of any changes in identified BMPs or measurable goals. **See Part III.**
7. Reference any reliance on another entity for achieving any measurable goals. **See Part III.**

Part II. Self-Assessment

The Town of Plaistow has completed the required self-assessment and has determined that our municipality is in compliance with all permit conditions, except the following provisions:

Part I.B.2(e). The US Fish and Wildlife Service determination of permit eligibility with regard to the Endangered Species Act is pending.

Part I.B.2(f). The US Fish and Wildlife Service determination of permit eligibility with regard to Essential Fish Habitat is pending.

Part I.B.2(g). The State Historic Preservation Officer determination of permit eligibility with regard to properties listed or eligible to be listed on the National Register of Historic Places is pending.

Part I.C. Determining whether stormwater discharges contribute to a 303(d) listed water body (Kelly Brook/Seaver River) and specifically identified control measures and BMPs to control the discharge of the pollutants of concern (bacteria, pH, dissolved oxygen). This effort is ongoing. Additional wet weather samples from outfalls contributing to this waterbody were collected in October 2014. See Part IV below.

Part III.A and B. See below for provisions of the Stormwater Management Program that remain in-progress.

During Permit Year 12, the Town conducted a number of stormwater-related activities including:

- Held numerous meetings with the Selectmen, Planning Board and staff regarding stormwater stewardship and regulatory responsibilities;
- Conducted quarterly Stormwater Task Force meetings consisting of members of the Planning Department, Compliance Department, the Town Manager, the Highway Department, and an outside stormwater consultant, Normandeau Associates, Inc.;
- Continued monitoring of stream water quality at established nineteen (19) surface water quality stations by the Town's Conservation Commission;

- Planned for and conducted dry-weather inspections of approximately 15% of the Town's stormwater outfalls in June 2014;
- Planned for and conducted sampling and laboratory analysis of stormwater discharged from fourteen (14) outfalls that previously had not been able to be sampled due to lack of flow. Sampling was conducted in October 2014;
- Town awarded a \$35,000 grant to update the Town's Source Water Protection Plan, to review/update the Aquifer Protection Ordinance, to review existing groundwater protection rules, and to develop a BMP inspection/survey program for Potential Contamination Sources (PCSs) identified in the Town as part of on-going water quality improvement efforts;
- Updated existing aquifer protection ordinance, which was approved by town wide vote at annual Town meeting in March 2015;
- Received \$120,000 funding for Potable Water Supply Feasibility Study project to evaluate the feasibility of converting existing fire suppression system to a combined fire suppression system/potable drinking water distribution system for residential and commercial area in vicinity of former leaking underground storage tank site.
- Town staff have actively been involved with organizations that provide education on stormwater and low-impact development issues;
- Cleaned 500 Town-owned catch basins and removed approximately 30 cubic yards of material during October 2014;
- Removed approximately 30 cubic yards of material swept from Town streets during the spring of 2014;
- Held two Household Hazardous Waste collections (May and October 2014);
- Coordinated stormwater education program conducted by New Hampshire Department of Transportation at the Pollard Elementary School in June 2014.
- Initiated dialogue with representatives of Timberlane Regional School District regarding conducting stormwater education programs at the middle school and high school levels in 2015;
- Plans for planting of 100 trees with Pollock Elementary School as part of Arbor Day event (April 24, 2015);
- Distributed public information on stormwater protection in hard copy, electronically (via the Town's website), and using the Town's cable TV service; and
- Town officials have collaborated to better define the ongoing decision-making processes that affect the Town's infrastructure and water quality.

Part III. Summary of Minimum Control Measures

1. Public Education and Outreach

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Through Permit Year 12 (Reliance on non-municipal partners indicated, if any)	Goals for Permit Year 13
1.1	Informational Brochures for yard work activities	Town Manager/Sean Fitzgerald	Develop and print 2,000 brochures and make available for distribution	- The brochure on yard waste was published as in Year 11 and distributed at events by Conservation Commission (i.e., Old Home Days) and available at Town Hall. - Worked on development of brochure for addressing dog waste. - Also pass out brochures on protecting water quality with automobile registrations.	- Distribute brochure on yard waste at Town Hall and during public events (i.e., Old Home Days). - Publish an article in the local paper on green yard maintenance techniques. - Create and distribute brochure addressing issues related to dog waste (in context of bacterial listing of waterways). This brochure will be provided to all dog license holders at time of issuance dog licenses and will be made available on the Town website and on the Cable TV channel. - Publish an article in the local paper on proper techniques for dog waste management. - Create dog license holder GIS layer to initiate efforts to target literature.
Revised					
1.2	Informational Brochures for Trash Management and Disposal of Hazardous Waste	Town Manager/Sean Fitzgerald	Develop and print 2,000 brochures and make available for distribution	Flyers and brochure were published and distributed as in Year 11 at events by Conservation Commission (i.e., Old Home	Review other resources for information brochures including neighboring communities, NHDES, and national outlets.

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Through Permit Year 12 (Reliance on non-municipal partners indicated, if any)	Goals for Permit Year 13
Revised				- Days), available at Town Hall, and shown on the Town's Cable TV channel and Town Website. - Two Public Service Announcement regarding Plaistow Recycling and JRM (solid waste contractor for Town) Information and Recycling listed on Town's web site. - Sections in the Town Annual Report for the Recycle Go-Green Committee as well as a listing of the recycling calendar.	- Update existing brochure for distribution and to be shown on the Cable TV channel. - Include section in Annual Report for Recycle Go-Green Committee.
1.3	Town Stormwater program in Annual Town Report	Town Manager/Sean Fitzgerald	Annually report on stormwater program activities	The Town of Plaistow's 2014 Annual Report included a dedicated section for the Town's Stormwater Committee as well as a section from the Water Department that focused on drinking water well testing.	The Town of Plaistow's 2015 Annual Report will include a dedicated section for the Town's Stormwater Management Task Force. It will also include a report from the Water Resources."
Revised					
1.4	High School Classroom education including teacher education	Town Manager/Sean Fitzgerald	Develop and implement program at Timberlane High School to teach both educators and students about stormwater	- Established communication with NH Fish & Game, NH Dept. of Environmental Services Project WET, NH Dept. of Transportation, and Mark Pedersen, Academic Dean of STEM at Timberlane Regional Middle and High School. - Developed list of Stormwater Education Programs offered by various agencies with list of point of contacts.	- Conduct classroom sessions at Timberlane High School of NH Fish and Game Watershed Education Program or appropriate water resources sections of the Wonders of Wildlife or Environmental Stewards program. - Additional session of NHDOT stormwater program at Pollard School.
Revised					
1.5	Promote BMPs on local cable TV	Cable Committee	Information on Cable and semiannually thereafter	Two stormwater PSAs are available on Town cable TV	Develop three cable access programs on the following

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Through Permit Year 12 (Reliance on non-municipal partners indicated, if any)	Goals for Permit Year 13
Revised				(Vimeo).	topics: a) New MS4 changes. b) Discussion of BMPs. c) Roundtable stormwater discussion, which may include task force members and members of the Rockingham Planning Commission and NHDES. • Post information provided by NHDES Source Water Protection Grant Program on slides to be run on Cable TV.
1.6	Hazardous Household Waste Collection	Highway Department/Dan Garlington	Semi-annual notice in paper, cable, website	• Held bi-annual collections (in May and October 2014); provided notices in local paper, cable TV and on the Town's website.	• The Town again will hold Household Hazardous Waste Collection Day scheduled twice annually in Plaistow (May 16, 2015) and in Hampstead (October 2015).
Revised					

1a. Additions

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Through Permit Year 12 (Reliance on non-municipal partners indicated, if any)	Goals for Permit Year 13
1.7	Middle School stormwater education	Town Manager/Sean Fitzgerald	Develop an education program with Regional Middle School	• Contacted Timberlane Regional School District representative to determine interest and schedules regarding stormwater education. • Contacted NHDOT Stormwater Outreach Program regarding their Spring 2015 schedule and NH F&G for their Spring and Fall 2015 schedule regarding appropriate water resources sections of the Wonders of Wildlife Program (ponds, wetlands).	• Teach project WET or NH Fish and Game watershed class. The School District is seeking option for obtaining funding for WET program.
1.8	Elementary School stormwater education	Town Manager/Sean Fitzgerald	Develop an education program with Elementary School	• Coordinated with Pollard Elementary School to have NHDOT conduct outreach to students on the impacts of stormwater on water quality using their “stormwater table” to provide a visual representation of the movement of stormwater across the landscape picking up pollutants (motor oil, fertilizers, pet waste, dirt, road salt, trash, soap) and ultimately ending up in aquatic ecosystems.	• Schedule the NHDOT to teach their stormwater outreach program for the Spring 2015. • Schedule NH F&G Wonders of Wildlife (ponds & wetlands) program for Fall 2015.

2. Public Involvement and Participation

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Through Permit Year 12 (Reliance on non-municipal partners indicated, if any)	Planned Activities Permit Year 13
2.1	Storm Drain Stenciling	Highway Department/Dan Garlington	Develop stencil program and stencil catch basins	- Attempts were previously made to mark a limited number of catch basins with a stencil system purchased by the Town. The paint and stenciling system did not work well. - The Town is evaluating other stenciling options including circular disks that can be attached to the pavement adjacent to the catch basin.	- Find stenciling system that works. - Stenciling 50% of catch basins in Town, if funding allows.
Revised					
2.2	Conservation Commission promotion of water quality	Conservation Commission/Tim Moore	Solicit public participation by news releases and cable and annually thereafter	- Conservation Commission continued promotion of stormwater issues via news release and cable TV announcements. - Conservation Commission coordinated with consultant to continue collection of surface water quality samples at 19 surface water sampling stations. - Conservation Commission developing database for surface water quality sampling results.	- Finish development of comprehensive water quality database which includes water quality data from the Conservation Commission as well as the Stormwater Task Force. - Collect annual surface water quality samples at 19 surface water sampling stations.
Revised					
2.3	Link on website for reporting problems and deficiencies	Town Manager/Sean Fitzgerald	Link on website and updated annually	Town received and responded to complaint from resident regarding	Review and revise process for submitting requests. Currently,

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Through Permit Year 12 (Reliance on non-municipal partners indicated, if any)	Planned Activities Permit Year 13
Revised	<i>Includes former section 4.4</i>			discharge of sump pump water onto street by neighboring property. Code enforcement officer reviewed situation and notified property owner that discharge was not allowed. - Reviewed the process for reporting problems and deficiencies. Link on web site to complaint form. Complaints typically submitted by letter or phone call. - It was agreed that the location of the feedback mechanisms and its method on the website warranted revision.	Town website has a printable form but no address or contact info. At minimum update form with submittal address, fax #, and email address. Check with “Virtual Town Hall” (web provide) to see if website can be modified to include an online submission.

2a. Additions

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Through Permit Year 12 (Reliance on non-municipal partners indicated, if any)	Planned Activities Permit Year 13
2.4	Place roadside signs identifying sub-watersheds in Town	Conservation Commission/Tim Moore	Place signs to note entering watersheds.	- A GIS map for Kelly Brook was prepared to optimize the process to select specific locations. - Four roadside signs identifying entrance into Kelly Brook watershed were installed by Highway Department staff and Conservation Commission personnel.	- The Town will select locations for next sign placements in Kelly Brook watershed and will install signs, as funding allows. - The Town will determine next watershed to mark and create GIS map for sign locations. - Town will order more signs for next watershed, and place signs in the rights-of-way, as funding allows.

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Through Permit Year 12 (Reliance on non-municipal partners indicated, if any)	Planned Activities Permit Year 13
2.5	Encourage public participation in planting vegetation that would improve stormwater quality	Conservation Commission/Tim Moore	Plant at least 100 (native to NH) trees or shrubs/year	Coordinated an Arbor Day event that involved students at the Pollard Elementary School planting 100 red maple seedlings in their green house for the students to take home in June 2014 for planting.	- Continued coordination with schools to plant trees with students on Arbor Day (already scheduled for 2015). - Seek donations from hardware stores in Town as well as landscaping companies for trees, soil and tools to plant.

3. Illicit Discharge Detection and Elimination

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Through Permit Year 12 (Reliance on non-municipal partners indicated, if any)	Planned Activities Permit Year 13
3.1	Preparation of Master Drainage Plan	Town Manager/Sean Fitzgerald	Delineation of outfalls to receiving waters	Verified and ground-truthed location and condition of 14 stormwater infrastructure facilities sampled during dry weather screening in June 2014 and wet weather screening/sampling in October 2014.	- Continue GPS of stormwater structures including state, town, and private structures and update map as necessary. - Develop a plan that identifies catch basins, drainage system features, pipes, etc. - Evaluating option of hiring intern to help with this task during summer of 2015.
Revised					
3.2	Storm sewer ordinance	Planning Board/Town Planner	Ordinance adopted by Town and reviewed annually	Reviewed stormwater related ordinances including Article XVI Stormwater – Illicit Discharge and Connection, Article XVIIA Stormwater – Post Construction, and Article XIXA Stormwater – Operation and Maintenance.	- Review ordinance for potential modification, as needed. - Review existing NH Town storm sewer ordinances and make recommendations for any changes to Town of Plaistow ordinances, as necessary.
Revised					
3.3	Qualitative observation of discharge at outfalls	Conservation Commission/Tim Moore	Observations of delineated outfalls	- Conducted dry weather inspections and observations at 14 outfall locations in June 2014. These were locations that previously had elevated E. Coli detections in stormwater samples. - Collected wet weather samples at 14 outfall locations in October 2014.	Review list of outfalls and determine if any locations need to be reviewed or need update for qualitative observation.
Revised					
3.4	Dry weather screening of outfalls	Conservation Commission/Tim Moore	Observations of delineated outfalls	All known outfalls have been inspected at least once.	Conduct dry weather observations at outfall locations

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Through Permit Year 12 (Reliance on non-municipal partners indicated, if any)	Planned Activities Permit Year 13
Revised				Developed summary table with schedule for conducting next round of inspections; goal of conducting 25% per year for next four years.	listed on inspection summary table for 2015 (~25% of all locations or 18 locations).
3.5	Develop program for elimination of illicit discharges, if any.	Conservation Commission/Tim Moore	Development of Plan	Program has been developed.	Review plan and make recommendations to improve program, if needed.
Revised					
3.6	Implement program for elimination of illicit discharges, if any	Conservation Commission/Tim Moore	Enforcement Actions taken	Program has been implemented.	- Implement revised program, if needed. - Additional screening will be subsequent to stormwater infrastructure investigation. - Develop schedule for remaining investigations based on results of stormwater sampling conducted to date.
Revised					

3a. Additions

	None				
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4. Construction Site Stormwater Runoff Control

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Through Permit Year 12 (Reliance on non-municipal partners indicated, if any)	Planned Activities Permit Year 13
4.1	Preparation of Town Ordinance to address BMPs for new construction, SWPPPs, setbacks and disposal of discarded building materials.	Planning Department/Town Planner	Adopt Subdivision and Site Review Amendments	Ordinances already established.	- Continue to evaluate ordinance. - Review other NH Town ordinances and make recommendations for modifications, as needed.
Revised					
4.2	Develop procedures for Site Plan review of Construction Site Runoff Control	Planning Department/Town Planner	Adopt Subdivision and Site Review Amendments	Ordinances already established.	- Continue to evaluate procedures. - Review other NH Town procedures and make recommendations for modifications, as needed.
Revised					
4.3	Develop procedures for site inspection, enforcement, and penalties for non-compliance	Code Enforcement/Mike Dorman	Adopt procedures	Ordinances already established.	- Continue to evaluate procedures. - Review other NH Town procedures and make recommendations for modifications, as needed.
Revised					

4a. Additions

	None				
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4b. Deletions

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Through Permit Year 12 (Reliance on non-municipal partners indicated, if any)	Planned Activities Permit Year 13
4.4	Provide link on website for reporting violations BMP 2.3 incorporates reporting violations for construction runoff; therefore, BMP 4.4 will be deleted.	Town Manager/Sean Fitzgerald	Information on website with mailing, phone, and email address to contact	Combined with BMP 2.3	

5. Post-Construction Stormwater Management in New Development and Redevelopment

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Through Permit Year 12 (Reliance on non-municipal partners indicated, if any)	Planned Activities Permit Year 13
5.1	Preparation of Town ordinance to address structural BMPs for land disturbance	Planning Department/Town Planner	Adopt Subdivision and Site Review Amendments	Ordinances were prepared in prior years.	- Evaluate ordinances and modify as needed. - Review other NH Town ordinances and compare with Plaistow.
Revised					
5.2	Develop procedures for Site Plan review and review of SWPPPs	Planning Department/Town Planner	Adopt Subdivision and Site Review Amendments	- The Planning Board and staff have evaluated procedures in prior years. - Town awarded a \$35,000 grant to update the Town's Source Water Protection Plan, to review/update the Aquifer Protection Ordinance, to review existing groundwater protection rules, and to develop a BMP inspection/survey program for Potential Contamination Sources (PCSs) identified in the Town. - Updated existing aquifer protection ordinance, which was approved by town wide vote at annual Town meeting in March 2015.	- Evaluate procedures and modify as needed. - Review other NH Town procedures and compare with Plaistow.
Revised					
5.3	Promote open drainage systems and groundwater recharge through infiltration systems	Planning Department/Town Planner	Adopt Subdivision and Site Review Amendments	- Ordinance was developed in 2004-2005. - Town awarded a \$35,000 grant to update the Town's Source Water	Create an LID development plan to be part of the Town's zoning regulations.

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Through Permit Year 12 (Reliance on non-municipal partners indicated, if any)	Planned Activities Permit Year 13
Revised				Protection Plan, to review/update the Aquifer Protection Ordinance, to review existing groundwater protection rules, and to develop a BMP inspection/survey program for Potential Contamination Sources (PCSs) identified in the Town.	
5.4	Develop procedures for site inspections, enforcement, fees	Code Enforcement/Mike Dorman	Develop procedures	- Procedures are established through occupancy permit. - Evaluated procedures and determined current form that is sent out to businesses regarding post-construction stormwater compliance should be revised (shortened and simplified).	- Modify post-construction stormwater compliance form. - Develop a database of businesses to send out the post-construction stormwater compliance form to be more user-friendly. - Develop an on-line form and submittal process for the Town website.
Revised					

5a. Additions

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Through Permit Year 12 (Reliance on non-municipal partners indicated, if any)	Planned Activities Permit Year 13
5.5	Assessment of Impervious Cover		Determine % imperviousness throughout Town	- Reviewed procedures/methods for calculating impervious cover (IC). - Reviewed funding possibilities for performing IC evaluation.	- Use GIS and GPS ground-truthing to establish impervious area of the individual watersheds within the Town. - Evaluating option of hiring intern to help with this task during summer of 2015.

6. Pollution Prevention and Good Housekeeping in Municipal Operations

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Through Permit Year 12 (Reliance on non-municipal partners indicated, if any)	Planned Activities Permit Year 13
6.1	Prepare Operations & Maintenance Plan to reduce pollutants from municipal activities	Highway Department/Dan Garlington	Develop plan	- Discussed components required for O&M plan at quarterly meetings. - Reviewed Highway Department garage with NHDES personnel as part of BMPs inspection prom for facilities that use/store chemicals or petroleum products.	- Research and review other) &M Plans for other Towns. - Prepare written plan and implement.
Revised					
6.2	Implement Employee Training Program	Highway Department/Dan Garlington	Train staff and review annually	- Staff continued to participate in stormwater coalition meetings and other training sessions and meetings with various associations, as time allows. - Highway department staff hold quarterly staff meetings, which include discussion on salt usage, storage/handling of salt, and how to address any spills of other materials. - Training sessions have been for the Town Selectmen, Planning Board, and Conservation Commission personnel.	- Develop list of additional training opportunities for Year 16 for highway department personnel and other staff. Participate in training opportunities when possible. - Continue participation in stormwater coalition meetings. - Develop annual training program for Highway Department staff.
Revised					
6.3	Catch basin and storm system maintenance	Highway Department/Dan Garlington	Clean and inspect catch basins at least once every two years	- Cleaned ~ 500 Town catch basins in October 2014. Conducted by the Highway Supervisor and independent contractor. - Removed approximately 30 yards of material, which is stockpiled at the highway depot for future use consistent with NH regulations and guidance.	- Review guidelines on Management of Street Wastes (WMD-SW-32) to evaluate reuse/disposal options and requirements. - Continue with annual fall catch basin cleanings.
Revised			Clean and inspect catch basins once per year in fall.		

6.4	Annual sweeping of streets in Town	Highway Department/Dan Garlington	Sweep 100% of streets annually by August 1	- Street sweeping is done annually in the spring by a independent contractor hired by the Town. Street sweeping was conducted in May 2014 and is scheduled to be conducted in May 2015 by Immaculate Power Sweeping. - Approximately 30 yards of material were removed in May 2014 that were composted with leaf litter..	- Scheduled to have street sweeping conducted in May 2015. - Review guidelines on Management of Street Wastes (WMD-SW-32) to evaluate reuse/disposal options and requirements.
Revised					

6a. Additions

	None				
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7. BMPs for Meeting Total Maximum Daily Load (TMDL) Waste Load Allocations (WLA) <<if applicable>>

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Through Permit Year 12 (Reliance on non-municipal partners indicated, if any)	Planned Activities Permit Year 13
Revised					
Revised					
Revised					
Revised					
Revised					
Revised					

7a. Additions

7b. WLA Assessment

Part IV. Summary of Information Collected and Analyzed

The Town of Plaistow planned for the dry weather inspection and wet weather sampling at an additional fifteen (15) outfalls (at a minimum). The Town has allocated funds for the inspections and sampling events. The Town has contracted with a consulting firm, Normandeau Associates, Inc., to conduct the inspections and sampling to be conducted in May and June 2014. Additionally, the Town has contracted to Normandeau Associates, Inc. to conduct surface water sampling at nineteen (19) locations. Each of the outfall sampling locations has been previously sampled and was determined to have bacterial populations in excess of State standards for surface water. Each of the surface water sampling locations has been previously sampled and will continue to be sampled annually. Sampling will be conducted to assess the efficacy of the best management practices.