

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

Bedford, NH

Permit Year 3

July 1, 2020 through June 30, 2021

EPA NPDES Permit Number NHR041036

Certification

Authorized Representative:

The authorization letter is:

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

N/A

- Publicly available at the website:

N/A

"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

Signature Date

Primary MS4 Program Manager Contact Information:

Name: Jeanne Walker Title/Position: Town Engineer/Assistant Director of Public Works

Department: Public Works

Street Address: 55 Constitution Drive

City: Bedford State: New Hampshire Zip Code: 03110

Email: jwalker@bedfordnh.org Phone Number: 603-472-3070

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, 2020 through June 30, 2021** in accordance with the Permit.

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

<https://www.epa.gov/npdes-permits/regulated-ms4-new-hampshire-communities>

Compliance activities have been identified and described in the Town of Bedford's Stormwater Management Plan (SWMP) and Illicit Discharge Detection and Elimination Plan (IDDE). Those documents can be found at the following websites and will be referred to throughout this report:

SWMP: <https://www.bedfordnh.org/DocumentCenter/View/4891/Bedford-SWMP-?bidId=>

IDDE: <https://www.bedfordnh.org/DocumentCenter/View/4065/MCM-3>

MCM1 - Public Education and Outreach

Year 3 Activities

BMP: Grass and Fertilizer

Document Name and Web Address: "Green Grass & Clear Water"

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

Description:

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

Targeted Audience:

Residential, Business and Institutions

Measurable Goal(s):

Lawn care enthusiast residents understand the potential water quality impacts from fertilizer and improper disposal of grass clippings and are aware of the proper lawn care management techniques for reducing those impacts. Goal measurables are municipal stormwater webpage view counts.

Following is the number of online document views: 6

Goal was achieved.

Message Date:

The brochure was posted online for the full reporting year.

Document Name and Web Address: "Fall 2020 Newsletter: Rake it or leave it"

https://www.bedfordnh.org/DocumentCenter/View/4758/DPW-Newsletter---Fall-2020_v2-FINAL

Description:

Section of the Town DPW Fall 2020 Newsletter providing information on leaf and yard waste related pollution as well as proper disposal techniques.

Targeted Audience:

Residential, Business and Institutions

Measurable Goal(s):

Goal measurables are newsletter distribution counts.

Following is the number of online document views: 136

Goal was achieved.

Message Date: 10/7/2020

Event:

Green Grass Clear Water Presentation on Lawn Care Best Practices Link:

https://media.unh.edu/media/Green+Grass%2C+Clear+WaterA+A+virtual+workshop+on+water+quality-friendly+lawn+care+in+northern+New+England+%28Summer+2021%29/1_bmoeq7d1

Description:

A virtual workshop on water quality-friendly lawn care in northern New England, hosted by the Bedford DPW as well as the towns of Derry and Litchfield.

Targeted Audience:

Residential, Business and Institutions

Measurable Goal(s):

Lawn care enthusiast residents understand the potential water quality impacts from fertilizer and improper disposal of grass clippings and are aware of the proper lawn care management techniques for reducing those impacts. Recording of webinar was also posted on the Town's website. Goal measurables are workshop attendance as well as additional workshop recording views.

Following is the number of attendees: 22 Total, 7 from Bedford

Following is the number of additional workshop recording views: 6

Goal was achieved.

Message Date:

June 21, 2021

Document Name and Web Address: "Town of Bedford Stormwater Management Information"

<https://www4.des.state.nh.us/nh-ms4/wp-content/uploads/2021/09/Bedford-Household-Hazardous-Waste-Day-Flyer.docx>

Description:

Distribution of brochures produced by Town of Bedford DPW and distributed at our annual Household Hazardous Waste Day, providing information on stormwater subjects including: Septic, Pet Waste, Leaf Litter, Lawn Care and Chemical Use, Pool Draining, and Salt Use.

Targeted Audience:

Residential, Business and Institutions

Measurable Goal(s):

Goal measurables are flyer distribution counts.

Following is the number of flyers distributed: 219

Goal was achieved.

Message Date:

June 19, 2021

BMP: Pet Waste Disposal**Document Name and Web Address:**

"Every Drop"

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

Description:

Distribution and promotion of "Every Drop" brochure with proper pet waste management, impacts of improper management and disposal requirements messaging. The brochure includes a pledge to pick up pet waste to be made available during dog registration and other events or venues (veterinarians, dog training, groomers, etc.). Every Drop is a collaborative education effort with PREP, NHDES and other partners.

Targeted Audience:

Residents and Business

Measurable Goal(s):

Dog owners and/or dog walkers are aware of the potential water quality impacts from pet waste, local pet waste ordinances, and how to dispose of pet waste properly. If pledges are signed, there will be an increase of dog owners committed to picking up pet waste. In addition, the town will be selecting five pledges to receive a standard dog license free of charge. Additional measurables include digital brochure view counts.

Following is the number of residents that pledged through the PREP "Every Drop" website: 1

Following is the number of online document views: 6

Goal was achieved.

Message Date: The brochure was posted online, at the DPW office, and at the Town Clerk's office for the full reporting year.

Document Name and/or Web Address: "Town of Bedford Stormwater Management Information"

<https://www4.des.state.nh.us/nh-ms4/wp-content/uploads/2021/09/Bedford-Household-Hazardous-Waste-Day-Flyer.docx>

Description:

Distribution of flyers produced by Town of Bedford DPW and distributed at our annual Hazardous Household Waste Day, providing information on stormwater subjects including: Septic, Pet Waste, Leaf Litter, Lawn Care and Chemical Use, Pool Draining, and Salt Use.

Targeted Audience:

Residential, Business and Institutions

Measurable Goal(s):

Goal measurables are flyer distribution counts.

Following is the number of flyers distributed: 219

Goal was achieved.

Message Date:

June 19, 2021

BMP: Disposal of Leaf and Grass Clippings

Document Name and Web Address: "Rake it or Leave it"

www.bedfordnh.org/DocumentCenter/View/4227/Leaf-Litter-Brochure

Description:

Distribute and promote informational brochure 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, Business and Institutions

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. Goal measurables are municipal stormwater webpage view counts.

Following is the number of online document views: 6

Goal was achieved.

Message Date:

The brochure was posted online for the full reporting year.

Document Name and Web Address: "Town of Bedford Stormwater Management Information"

<https://www4.des.state.nh.us/nh-ms4/wp-content/uploads/2021/09/Bedford-Household-Hazardous-Waste-Day-Flyer.docx>

Description:

Distribution of flyers produced by Town of Bedford DPW and distributed at our annual Household Hazardous Waste Day, providing information on stormwater subjects including: Septic, Pet Waste, Leaf Litter, Lawn Care and Chemical Use, Pool Draining, and Salt Use.

Targeted Audience:

Residential, Business and Institutions

Measurable Goal(s):

Goal measurables are flyer distribution counts.

Following is the number of flyer distributions: 219

Goal was achieved.**Message Date:**

June 19, 2021

BMP: Septic System Maintenance**Document Name and Web Address: "Get Pumped"**

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

Description:

Distribute and promote brochure, directing to website to educate New Hampshire homeowners with septic systems on how to identify, locate and maintain those systems. Get Pumped NH is a collaborated effort between the New Hampshire Association of Septage Haulers (NHASH) and the New Hampshire Department of Environmental Services (NHDES).

Targeted Audience:

Septic System Owners

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 is the number of online document views: 6

Goal was achieved.**Message Date:**

The brochure was posted online and at the DPW office for the full reporting year.

Document Name and Web Address: "Town of Bedford Stormwater Management Information"
<https://www4.des.state.nh.us/nh-ms4/wp-content/uploads/2021/09/Bedford-Household-Hazardous-Waste-Day-Flyer.docx>

Description:

Distribution of flyers produced by Town of Bedford DPW and distributed at our annual Household Hazardous Waste Day, providing information on stormwater subjects including: Septic, Pet Waste, Leaf Litter, Lawn Care and Chemical Use, Pool Draining, and Salt Use.

Targeted Audience:

Residential, Business and Institutions

Measurable Goal(s):

Goal measurables are flyer distribution counts.

Following is the number of flyer distributions: 219

Goal was achieved.

Message Date:

June 19, 2021

BMP: Industrial Outreach

Description:

Distribute outreach letter and stormwater fact sheet to industrial facilities located within MS4 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

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).

Following is the number of letters, including fact sheets, that were distributed:

3, This is 100% of Industrial Sewer Permittees within Bedford

Goal was achieved.

Message Date:

May 18, 2021

MCM2 - Public Participation

BMP: Public Participation in Stormwater Management Program Development

Description:

The Stormwater Management Program was publicly available on the town website. A new stormwater webpage has been launched this year to focus on the MS4 requirements and to provide public access to informational documents and records. A link that provides an opportunity for public feedback is included within our new stormwater webpage. Documents and records relating to the permit are retained and available for 5 years to the public at the DPW office.

Measurable Goal(s):

Input was received and records are maintained.

Following is the number of municipal stormwater webpage views: 1,157

Following is the number of public comments received: 0

Goal was achieved.

MCM3 – Illicit Discharge Detection and Elimination

BMP: IDDE Legal Authority

The municipality has established legal authority as outlined in the IDDE plan.

BMP: Sanitary Sewer Overflow (SSO) Inventory

This is not applicable to the Town because there were not any known sanitary sewer overflows.

BMP: Map of Storm Sewer System

Map of storm sewer system and associated outfalls was completed in Year 2.

BMP: IDDE Program (Screenings of Outfalls/Interconnections, Catchment Investigations, and IDDE Progress)

All outfalls and interconnections (excluding problem and excluded outfalls) were inspected and screened. Outfall catchments and interconnections priority ranking were updated based on the information collected during the dry weather inspections. A written IDDE plan has been developed and updated, and written catchment investigation procedures are included.

Outfall identification, characterization and prioritization information was unchanged and included in the IDDE plan based on dry weather sampling results

The following tasks have been completed in accordance with the permit.

Number of dry weather outfall investigations/screenings: 34

Number of dry weather samples taken: 16

(See attachment for further dry weather screening results details)

BMP: Employee Training

The Town held an IDDE training session for municipal staff on 4/6/2021. In addition, as a routine, IDDE materials and training, including information on how to identify illicit discharges and SSOs are made available to applicable employees in accordance with IDDE plan. Training logs are included in Appendix F of the IDDE report.

MCM4 – Construction Site Stormwater Runoff Control

A written site inspection and enforcement program for erosion and sediment control measures was created and is included in our SWMP.

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

Number of site plan reviews completed: 35

Number of inspections: 24

Number of enforcement actions: 0 (9 issues corrected prior to requiring enforcement)

Number of Stormwater and Land Disturbance Permits issued: 9

MCM5 – Post Construction Stormwater Management in New Development and Redevelopment

BMP: Post-Construction Ordinance (due in year 3)

A Post-Construction Ordinance, consistent with the permit requirements, has been adopted. It is contained within our Stormwater and Land Disturbance Management Regulations, Section 1.08.

BMP: As-built Drawings

A program to address post-construction stormwater runoff from all new development and redevelopment projects has been developed and implemented, and includes projects that disturb a minimum of one acre, or less than one acre if part of a larger common plan. Procedures for new development and re-development have been adopted and are included as part of the Stormwater and Land Development Management Regulations. The purpose of stormwater and land development management standards is to provide reasonable guidance for the regulation of stormwater runoff, during planning, design, construction and post-construction phases, to protect local natural resources from degradation and prevent adverse impacts to adjacent and downstream land, property, facilities and infrastructure. These standards regulate discharges from stormwater and runoff from land development projects and other construction activities to control and minimize increases in stormwater runoff rates and volumes, soil erosion, stream channel erosion, and nonpoint source pollution associated with stormwater runoff. The stormwater management standards apply to any development or redevelopment projects which are subject to Site Plan Review or Subdivision approval that disturb more than 20,000 square feet or disturb more than 10,000 square feet within 100 feet of a surface water body. These standards apply to disturbances of less than the limits above if that disturbance is part of a large common plan for development that would disturb 20,000 square feet or more. The applicant shall submit as-built drawings of the constructed stormwater management system to the Department of Public Works following construction.

BMP: Long-term Operation and Maintenance Procedures

A program to address long-term post-construction stormwater runoff from all new development and redevelopment projects has been developed and implemented, and include projects that disturb more than 20,000 ft², or more than 1000 ft² if within 100' of a surface water body. Procedures for long-term Operation and Maintenance have been adopted. Submission requirements for stormwater management reports and plans are included in local regulations and can be found at: <https://www.bedfordnh.org/DocumentCenter/View/4245/Stormwater-and-Land-Disturbance-Management-Regulations> .

In addition, in an effort to standardize the long-term O&M and inspection submission requirements across all New Hampshire MS4 communities, as well as standardize any non-compliance actions taken by the municipality, the Seacoast Stormwater Coalition is in the process of working with a selected engineering group (VHB) to develop standardized resources, guidance and an inspection template that towns and municipalities can use to better promote, track and enforce the implementation of best management practices for privately-owned parking areas and drainage infrastructure. These are anticipated to be finalized in the fall of 2021 and will be implemented by the Town.

BMP: Street Design and Parking Lot Guidance Report (due in year 4)

Deliverables will progress in accordance with the permit and is scheduled for year 4.

BMP: Green Infrastructure Report (due in year 4)

Deliverables will progress in accordance with the permit and is scheduled for year 4.

BMP: List of Municipal Retrofit Opportunities (due in year 4)

Deliverables will progress in accordance with the permit and is scheduled for year 4.

MCM6 – Good Housekeeping and Pollution Prevention for Permittee Owned Operations

BMP: Catch Basin Cleaning Program

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. Catch basin cleanings were properly stored and disposed of so that they did not discharge to receiving waters. This is detailed in the SWMP.

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

Number of catch basins within MS4 regulated area: 2065

Number catch basins inspected in accordance with the SWMP: 1514

Number of catch basins cleaned: 1514

Total volume of material removed: 800.67 Cubic Yards

BMP: Street Sweeping Program

A street sweeping program has been established such that all streets with curbing and/or catch basins and permittee-owned parking lots are swept in accordance with permit conditions. Street sweepings were properly stored and disposed so that they did not discharge to receiving waters.

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

Number of lane miles swept: 85.6

Volume of swept material: 106 Cubic Yards

BMP: Winter Road Maintenance Program

A winter road maintenance program has been established 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.

The Town has drafted a Salt Reduction Plan in accordance with Appendix H that will be implemented in the MS4 regulated area by year 5. The Town's Salt Reduction Plan can be found at: <https://www.bedfordnh.org/DocumentCenter/View/5346/Salt-Reduction-Plan?bidId>

BMP: Permittee Owned Facilities Inventory

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:
Town Transfer Station (SWPPP)

BMP: O&M Programs and Procedures for Permittee-Owned Properties

O&M programs for all permittee owned facilities have been completed and are included in our SWMP. All maintenance procedures have been implemented for permittee owned facilities in accordance with O&M programs.

BMP: Permittee Owned Treatment Structures

The Town has inspected all known permittee owned treatment structures (excluding catch basins)

BMP: SWPPP (due year 3)

SWPPPs were implemented for the following facilities: Public Works Complex and the Transfer Station

Inspections are completed, corrective actions taken, and employees are regularly trained as outlined in the SWPPPs. The SWPPPs and associated documentation are located at the DPW Office.

Number of site inspections for facilities that require a SWPPP completed: 6

Number of corrective actions identified: 0

Number of corrective actions taken: 0

BMP: Stormwater Treatment Structures Inspection and Maintenance Procedures

The Town continues to collect information with a goal of inventorying and formally inspecting all municipally owned BMPs. Maintenance is carried out in accordance with the procedures outlined in the SWMP. Any BMPs that are safety or flooding hazards are dealt with as needed.

TMDL's and Water Quality Limited Waters

Bacteria/Pathogens

Outfalls to these receiving waters have been ranked as high priority for the IDDE implementation in the initial outfall ranking and enhanced BMP's have been implemented in accordance with the SWMP.

Phosphorus

Outfalls to these receiving waters have been ranked as high priority for the IDDE implementation in the outfall ranking and enhanced BMP's have been implemented in accordance with the SWMP.

The Town through its participation in the Lower Merrimack Valley Stormwater Coalition, and continued involvement with the NHDES led Pollutant Tracking and Accounting Program (PTAP) and the Pollutant Loading Maps (aka Hot Spot Maps), will satisfy the tracking and accounting requirement of the municipally-owned structural and non-structural BMP's. Calculations are in accordance with attachments of Appendix F.

Chloride

Outfalls to these receiving waters have been ranked as high priority for the IDDE implementation in the initial outfall ranking.

Tracking of the amount of salt applied to all municipally owned and maintained surfaces, and reporting of salt use has been completed using New Hampshire DES MS4 annual salt usage reporting form.

The Town through its participation in the Lower Merrimack Valley Stormwater Coalition, and continued involvement with the NHDES-led Green Snow Pro Program, have completed winter road maintenance procedures and continue to develop public education efforts regarding impacts of salt use, methods to reduce salt use on private property, and modifications to driving behavior in winter weather.

The Municipal Green Snow Pro Certification Program bill was delayed during the 2020 legislative session due to COVID-19. The bill was put back into legislation during the 2021 legislative session. In June of 2021, it was noted as "ought to pass" by the House of Representatives.

The Town has several operators that have been certified through the Green Snow Pro Training and certified as Salt Applicators through NHDES.

The Town's Salt Reduction Plan can be found at:
<https://www.bedfordnh.org/DocumentCenter/View/5346/Salt-Reduction-Plan?bidId>

Additional Required Information

Monitoring or Study Results

No additional monitoring or studies were completed.

Description of Any Changes in Identified BMPs or Measurable Goals

The Town 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 for the Next Reporting Cycle

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