

Year 5 Annual Report

New Hampshire Small MS4 General Permit

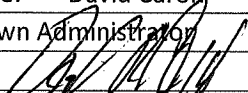
Reporting Period: July 1, 2022 - June 30, 2023

Derry, NH

EPA NPDES Permit Number NHR041005

Certification of Small MS4 Year 5 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: David Caron	
Title: Town Administrator	
Signature: 	Date: 9/25/23

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: Michael Fowler	Title/Position: Director of Public Works	
Department: Derry Department of Public Works		
Street Address: 14 Manning Street		
City: Derry	State: New Hampshire	Zip Code: 03038
Email: mikefowler@derrynh.org	Phone Number: 603-432-6144	

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, 2022, through June 30, 2023**, 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 Derry’s Stormwater Management Program Plan (SWMP) and Illicit Discharge Detection and Elimination (IDDE) Plan. Those documents and other pertinent Year 5 information can be found in submission or at the following websites, and will be referred to throughout this report:

SWMP: https://www.derrynh.org/sites/g/files/vyhlf3026/f/pages/derrynh-swmp-2022-final.pdf
Date SWMP was Last Updated: September 2022
IDDE Program Plan: https://www.derrynh.org/sites/g/files/vyhlf3026/f/pages/idde-plan_2019-derry-rev2019dec.pdf
Updated System Map https://www.derrynh.org/environmental/pages/stormwater-infrastructure-map-2022
Progress on Completion of System Map: The map is updated as changes occur or construction projects are completed. The Town has started mapping Town and state-owned BMPs and drainage easements.
Updated SSO Inventory: See attached updated table
Updated Inventory and Ranking of Outfalls/Interconnections: see attached (no updates)
Dry Weather Screening Data: No data available
Wet Weather Screening Data: See attached tables
Catchment Investigation Data: No catchment investigations conducted this reporting period
Illicit Discharge Removal Report: see attached reports
Results from additional stormwater or receiving water quality monitoring reports or studies: see attached data tables.

Salt Reduction Plan: https://www.derrynh.org/sites/g/files/vyhlf3026/f/pages/derry_crp_2022september-final.pdf
Annual Salt Usage Report: attached

Updated Nitrogen Source Identification Report: Not Applicable

Updated Phosphorus Source Identification Report:

<https://www.derrynh.org/sites/g/files/vyhlf3026/f/pages/phosphorus-source-identification-report-derry-final.pdf>

Street Sweeping Schedule: See MCM#6 of this report for street sweeping schedule

Chloride Reduction Plan:

https://www.derrynh.org/sites/g/files/vyhlf3026/f/pages/derry_crp_2022september-final.pdf

Annual Salt Usage Report: attached

Lake Phosphorus Control Plan: In Process

Lake Phosphorus Control Plan (Items 1-4):

<https://www.derrynh.org/sites/g/files/vyhlf3026/f/pages/phosphorus-source-identification-report-derry-final.pdf>

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 5 reporting period and can be found on the [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 checked="" type="checkbox"/> Bacteria/Pathogens	<input checked="" type="checkbox"/> Chloride	<input type="checkbox"/> Nitrogen
<input checked="" type="checkbox"/> Phosphorus	<input type="checkbox"/> Solids/Oil/Grease (Hydrocarbons)/Metals	
TMDL(s)		
<input checked="" type="checkbox"/> Bacteria and Pathogens	<input checked="" type="checkbox"/> Chloride	<input checked="" type="checkbox"/> Lake and Pond Phosphorus

Receiving Waters/Impaired Waters/TMDL

Have you made any changes to your lists of receiving waters, outfalls, or impairments since the NOI was submitted?

Yes

The Town of Derry has made changes to the list of receiving waters, outfalls, or impairments since the NOI submission. The following impairments and/or TMDLs have been added or delisted:

Water Quality Impaired Waters: None

TMDL: None

No

The Town of Derry has not made changes to the list of receiving waters, outfalls, or impairments since the NOI submission.

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

Not Applicable

Minimum Control Measures

MCM 1: Public Education

Total number of all MS4 related educational efforts completed *during this reporting period*: 12

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

No

Yes. The Town of Derry made changes due to (Not Applicable)

BMP: Grass and Fertilizer

Outreach Resources:

Green Grass & Clear Water Brochure:

https://www.derrynh.org/sites/g/files/vyhlf3026/f/uploads/green_grass_and_clear_water_flyer_2019.pdf

Description:

Distribution and promotion of flyers 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. The flyers were customized with Town contact information and distributed through the Derry Municipal Center kiosk, the Town of Derry website, and distributed to Beaver Lake Improvement Association and Big Island Pond Corporation for delivery to their membership via newsletter.

Targeted Audience:

Residential and/or Business and Institutions

Responsible Department/Parties:

Public Works with assistance from Beaver Lake Improvement Association and Friends of Big Island Pond.

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 that were distributed *during this reporting period*:

Year 5 = 25 of flyers taken from Derry Town Hall kiosk.

Goal was achieved.

Message Date: Throughout the year at the Derry Municipal Center kiosk.

BMP: Pet Waste Disposal

Outreach Resources:

"Every Drop" flyer <https://www.derrynh.org/sites/g/files/vyhli3026/f/pages/derry-scoopthepooppledge2020.pdf>

Description:

Distribution and promotion of "Every Drop" flyers with proper pet waste management, impacts of improper management, pet waste ordinance, and disposal requirements messaging. The flyer includes a pledge to pick up pet waste and is made available during dog registration and at kiosks at the Derry Municipal Center. Every Drop is a collaborative education effort with PREP, NHDES and other partners.

Targeted Audience:

Residents - Pet Owners

Responsible Department/Parties:

Department of Public Works and Town Clerk

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.

Following is the number of residents that pledged through the PREP "Every Drop" website **during this reporting period:**

Year 5 = 26 residents pledged online through the PREP "Every Drop" we

And

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

Year 5 = 15 flyers taken from Town Hall kiosk

Year 5 = ~3000 flyers were mailed out by the Town Clerk with dog registration reminders

Goal was achieved.

Message Date: Dog Registration – February through May
Town Hall Kiosk - Continuous

BMP: Pet Waste Disposal

Outreach Resources:

Pet Waste Cleanup Signs

Description:

Permanent signs remain posted at locations where pet waste has previously been an issue. The signs state pet waste must be picked up per ordinance requirements.

Targeted Audience:

Residents - Pet Owners

Responsible Department/ Parties:

Department of Public Works

Measurable Goal(s):

Dog owners and/or dog walkers become aware of the ordinance and do not leave pet waste in problem areas.

Since first posting of the signs, the volume of pet waste picked up by town employees has decreased significantly and either remained low or has not been encountered during grounds maintenance.

Goal was achieved.

Message Date: Continuous

BMP: Disposal of Leaf and Grass Clippings

Outreach Resources:

1) *Rake It or Leave It* Brochure:

https://www.derrynh.org/sites/g/files/vyhlf3026/f/pages/rakeitorleaveit-desyardwastebrochure-final_2.pdf.

2) *Fall Yardwaste Cleanup - Rake It Or Leave It* – Press Release (attached) published in Derry News as “Town offers tips for proper disposal of leaves” 12/15/22 (attached)

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. The flyers were customized with Town contact information messaging and distributed through the Derry Municipal Center kiosk, the Town of Derry website, and distributed to Beaver Lake Improvement Association and Big Island Pond Corporation for

delivery to their membership via newsletter and distributed to attendees at the Joint Derry/Londonderry Household Hazardous Waste Collection Event in Derry.

And

The Press Release which was posted to the Town Website and published in the Derry News included above information and that Town of Derry accepts yard waste from residents at the Derry Transfer Station.

Targeted Audience:

Residential and/or Business and Institutions

Responsible Department/Parties:

Public Works with assistance from Beaver Lake Improvement Association and Friends of Big Island Pond.

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 brochures that were distributed **during this reporting period:**

Year 5 = 25 Brochures taken from Town Hall kiosk throughout the year

Year 5 = 283 brochures were distributed to attendees of the household hazardous waste collection event (203 to Derry residents and 80 to Londonderry residents)

And

The Derry News is distributed to residents in Derry and Londonderry with a combined population of 60,500.

Goal was achieved.

Message Date:

Brochures at Town Hall Kiosk – Continuous

Fall Press Release – issued/posted to website 11/18/22, Derry News 12/15/22 (attached)

Spring – Household Hazardous Waste event 5/20/23

BMP: Septic System Maintenance

Outreach Resources:

- 1) *Get Pumped* - <https://www.derrynh.org/sites/g/files/vyhlif3026/f/uploads/get-pumped-community-brochure.pdf>
- 2) *“SepticSmart Quick Tip: Pump Your Tank!”* – Shared NHDES Outreach Link to Derry community Facebook page (attached)
- 3) *Do Your Part-Be SepticSmart-A simple guide to the proper care and maintenance of your septic system (EPA-832-B-12-003 September 2012)*

https://www.derrynh.org/sites/g/files/vyhlf3026/f/uploads/septicmart_short_rack_brochure_030915-edited.pdf

- 4) "GREENWorks: Do You Know Where Your Septic Tank Is?" Nutfield News Article 12/8/22 (attached)

Description:

Brochures and newspaper article educating New Hampshire homeowners with septic systems on how to identify, locate and maintain those systems.

- 1) "Get Pumped" brochure is available on the Town's website and available at Derry Municipal kiosk. 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). 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).
- 2) *SepticSmart Quick Tip: Pump Your Tank!* - Social medial post
- 3) The EPA brochure *Do You Part-Be Septic Smart* is available on the Town's website and available at Derry Municipal Center kiosk.
- 4) "GREENWorks" newspaper article published in the Nutfield News distributed to Derry residents (Attached)

Targeted Audience:

Septic System Owners - Residential and Commercial/Industrial

Responsible Department/Parties:

Department of Public Works

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 brochures and letters that were distributed **during this reporting period:**

Year 5 = 25 "Get Pumped" brochures taken from Town Hall kiosk

Year 5 = 31 "Septic Smart" brochures taken from Town Hall kiosk

Year 5 = Nutfield News is distributed to Derry residents (population 34,749)

Goal was achieved.

Message Date: Get Pumped Brochure – Continuous
Septic Smart Brochure – Continuous
SepticSmart Quick Tip: Pump Your Tank! - 09/23/22 Social medial post
GREENWORKS article in Nutfield News – 12/8/22

BMP: Sanitary Sewer Overflow and Backup Prevention

Outreach Resources:

“What’s Flushable?” Brochure

<https://www.derrynh.org/sites/g/files/vyhlf3026/f/uploads/whats-flushable.pdf>

Description:

Distribute and promote brochure prepared by NHDES educating the public on what us and what should not be flushed down the drain, how these impact sewer systems and septic systems and can cause backups leading to water quality issues.

Targeted Audience:

All Residents (Homeowners with Septic Systems and anyone connected to municipal sewer.)

Responsible Department/ Parties:

Department of Public Works, Wastewater Division

Measurable Goal(s):

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

Year 5: 25 brochures were taken from the Derry Municipal Center kiosk.

25 brochures were taken from the DPW/Code Enforcement office kiosk.

Goal was achieved.

Message Date: Continuous

BMP: Sanitary Sewer Overflow and Backup Prevention

Outreach Resources:

“Derry Guide to Sump Pump Connections” Brochure

https://www.derrynh.org/sites/g/files/vyhlf3026/f/uploads/sump_pump_connection_brochure_2011.pdf

Description:

Distribute and promote brochure prepared by the Town of Derry educating the public on the proper and legal method of installing sump pumps to prevent overloading of the municipal sewer that can lead to overflows or backups. Brochures are on display at Derry Municipal Center kiosk.

Targeted Audience:

Resident homeowners that are connected to municipal sewer and have sump pumps or are considering installing sump pumps.

Responsible Department/ Parties:

Department of Public Works, Wastewater Division

Measurable Goal(s):

Residents are aware of the regulations regarding sump pump connections, and the risk from illegally connecting to municipal sewer. Residents also become aware of how and where discharge from sump pumps is allowed or restricted.

Year 5: 14 Flyers taken from Municipal Center kiosk during the reporting period.

Goal was achieved.

Message Date: Continuous

BMP: Stormwater Pollution**Document Name and/or Web Address:**

"After the Storm: A Citizen's Guide to Understanding Stormwater"

https://www.derrynh.org/sites/g/files/vyhlf3026/f/uploads/cu_after_the_storm_rev_0.pdf

Description:

Distribution of editable USEPA guide explaining stormwater runoff, why it is a problem, the effects of polluted runoff, and general overview of stormwater pollution solutions for residential, commercial, agricultural, construction, and automotive facility sites.

Targeted Audience:

Residents

Measurable Goal(s):

Year 5 = 283 brochures were distributed to attendees of the household hazardous waste collection event (203 to Derry residents and 80 to Londonderry residents)

Goal was achieved.

Message Date:

- May 20, 2023 at Household Hazardous Waste Collection Event
- Flyer posted on website (see link above)

BMP: Restaurants and Food Service Establishments Outreach

Outreach Resources:

Stormwater Pollution Prevention for Restaurants and Food Service Establishments Brochure
(attached)

Description:

In response to an illicit discharge from a restaurant during a prior reporting year, the Town of Derry created this new brochure for restaurants and other food service establishments. The brochure explains how pollution from food service industry poses a threat to water quality caused by improper disposal of grease, improperly maintained grease traps or handling or disposal of cleaning chemicals and trash can impact stormwater and the waterbodies it flows to. It also includes Do's and Don'ts of restaurant waste and grease management, and tips for managers to ensure employees and contractors practice good housekeeping. Due to observed at the Town's WWTF influent pump station and periodic grease blockages, the Town continued with this outreach effort.

Targeted Audience:

Commercial – Restaurant owners/managers, institutional kitchens, and food trucks.

Responsible Department/ Parties:

Department of Public Works, Health Department

Measurable Goal(s):

Restaurant/Food service managers and employees are aware of pollution risks from their business, decrease in stormwater carried pollutants, improved maintenance of grease traps, and elimination of sewer blockages.

Year 5 = The Health Department delivered over 150 brochures to restaurants, institutions, and food truck owners during health Department inspections.

Message Date: Throughout the year during inspections by the health department.

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

Not Applicable

MCM 2: Public Participation

- Provided an opportunity for public participation in review and implementation of SWMP and complied with State Public Notice requirements as described in the Town of Derry 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 remains available for public review and comment on the Town of Derry's Webpage. Documents and records relating to the permit are retained and available for 5 years to the public at location at the Derry Municipal Center, Public Works Office.

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

No

Yes. Derry made the following changes:

Measurable Goal(s):

Continued input received from Big Island Pond Corporation reaching out to the town of Derry for development of approach to watershed management plan for Big Island Pond. Records are maintained.

Goal was achieved.

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

While public involvement or participation opportunities are ancillary to daily operations, The Town of Derry has conducted the following public involvement or participation opportunities.

BMP: Shoreline Cleanup

Description:

The Town promotes shoreline cleanup in conjunction with roadside cleanup. The Beaver Lake Improvement Association (BLIA) organizes two shoreline cleanup events each year, spring and fall. The events were advertised through the BLIA Beaver Lake Email Newsletters (attached). The Town provides all the trash bags and coordinates with BLIA to pickup of trash bags left by participants along the roads.

Participating Party:

Residents - Beaver Lake Improvement Association volunteers in cooperation with Public Works/Transfer Station.

Measurable Goal(s):

Fall and Spring Shoreline Cleanup was organized and conducted by volunteers from BLIA.

Activity Date:

- October 15, 2022 – BLIA members organized shoreline cleanup day (Email newsletter attached)
- May 6, 2023 – BLIA members organized shoreline cleanup day. (Email newsletter attached)

BMP: Roadside Cleanup**Description:**

The Derry Go Green Committee, which is made up of volunteers, with the assistance of the Town, conservation commission, and Parks & Recreation Department, promotes roadside, trail and park cleanups for residents to perform trash pickup in areas of their choosing.

Participating Party:

The Town provides all the trash bags through the Derry transfer station and Derry Public Library. Department of Public Works coordinates the pickup of trash bags left by participants along the roads and rail trail.

Volunteers consisting of individuals, neighborhood groups, Derry Rail Trail Alliance, and Girl Scout Troop 63150.

Measurable Goal(s):

Numerous Volunteer groups participated cleaning up roadsides, parks, and rail trail. See *Derry Earth Day Cleanup!* Facebook page for photos posted by volunteer groups:
<https://www.facebook.com/groups/559896645807956/>

Activity Dates:

- Week of April 10-15, 2023– Coincides with the weeks surrounding Earth Day

BMP: Household Hazardous Waste Collection Events**Description:**

The Town sponsors and holds a household hazardous waste collection event each year in May. The event is open to residents of Derry and Londonderry. The Town of Londonderry reciprocates and sponsors and holds an event each year in November which is open to residents of Derry and Londonderry. These events are held at no charge to residents.

The Town also uses this opportunity to distribute outreach material to residents. During the May 2023 event, workers handed out the following to all attendees:

Rake it or Leave It (proper yard waste disposal)

After The Storm: A Citizen's Guide to Understanding Stormwater brochure.

Participating Party:

Residents – Derry and Londonderry, Sponsored by the Town of Derry.

Measurable Goal(s):

Derry HHW Event May 20, 2023:

- 283 vehicles (203 Derry, 80 Londonderry) representing 294 total Households.
- 18,904 lbs of HHW collected and kept out of the environment or solid waste wastestreams.

Londonderry HHW Event – November 12, 2022

- 142 cars representing 147 Derry households were represented at the Londonderry HHW event.

Activity Date:

- November 12, 2022 (sponsored by and held in Londonderry)
- March Through May - Outreach included notices and announcements each televised Town Council meeting held twice per month and the Conservation Commission monthly meetings, reader board at entrance to Transfer Station, notice sent out to subscribers of the Town’s ListServ, Derry’s and Londonderry’s newsletters, posts on several different webpages within Derry’s and Londonderry’s website, and posted on social media (Facebook) pages including *Town of Derry, Derry Transfer Station, Bringing Derry Together, and Londonderry NH* Facebook pages.
- May 20, 2023 – Derry HHW collection event

BMP: Pet Waste Cleanup Signs

Description:

The apartment management company at an 849-unit apartment complex development consisting of 31 buildings continues to keep their own signs posted informing residents to clean up after their dogs to protect health and water quality. The signs include poop bags and barrels.

Targeted Audience:

Residents - Pet Owners

Measurable Goal(s):

The effort voluntarily made by the apartment management company to post the signs and provide bags and barrels.

Decrease in dog waste left and the number of bags left on the ground (realized by the apartment management company).

Lack of bacteria problems in local watershed catchment.

Message Date:

- Continuous

BMP: School Tours and Environmental Education

Description:

The Town continues to have staff available for local educational institutions for tours of the Town's wastewater treatment plant (WWTP) and to promote environmental education.

The Town worked with the Next Charter School to provide a tour of the WWTP and explain how wastewater is treated.

The school science teacher was also teaching a water quality class for high school students beginning the second week of March that would continue through the end of the school year. Each week, they were sampling the brook and pond, testing each site for temperature, pH, dissolved oxygen, turbidity, nitrates, electrical conductivity, and flow rates. We'll also be measuring the flow rate of the brook. To supplement their education, the school reached out to the Town to discuss water quality in town. The Town's Environmental Coordinator met with the school's students at Hood Park to give a hands-on presentation to the students on surface water quality and effects of stormwater pollution using a Watershed Model on loan from NHDES.

Participating Party:

Next Charter School Students and Science Teacher with Town of Derry Staff.

Measurable Goal(s):

Schools (teachers/students) participate in tours and environmental programs:

- Tour of Wastewater Treatment Facility
- Hood Park Watershed & Stormwater Pollution presentation

Message Date:

- WWTF Tour – October 11, 2022
- Hood Park – Water Quality/Watershed Model presentation – April 13, 2023

BMP: Big Island Pond Watershed Management Plan

Description:

During the prior reporting period, the Town of Derry teamed up with the Big Island Pond Corporation to apply for a Clean Water State Revolving Loan Fund (CWSRF) for the purpose of developing a Watershed-based Management Plan (WMP) for Big Island Pond (BIP) that meets Clean Water Action Section 319 Guidelines. Big Island Pond is located within the towns of Derry, Atkinson and Hampstead, all of which are MS4-permittees, and is impaired for phosphorus and bacteria. The Towns of Atkinson and Hampstead provided letters of support. The Town was successful in the application and the SRF was converted to an ARPA Grant.

During the reporting period, the Town, with input from Big Island Pond Corporation (BIPC) volunteers, prepared a Request for Qualifications for Qualifications Based selection process to

choose a consultant to prepare the WMP. The Town and BIPC volunteers reviewed qualification submittals, conducted consultant interviews, selected the consultant, and provided input into the scope of services which included a volunteer effort to help gather shoreline data.

Friends of Big Island Pond (FBIP) participates in the VLAP program and performs lake monitoring in coordination with NHDES. Data collected will be used in the development of the WMP. FBIP also coordinates with students from local schools and Pinkerton Academy to educate them on water quality issues (see attached website and social media posting)

Participating Party:

Town of Derry and volunteers from Big Island Pond Corporation involved in the consultant interviews, consultant selection, and review of the Appendix A Scope of Services.

Measurable Goal(s):

Volunteer involvement from Big Island Pond Corporation and Friends of Big Island Pond. Scope of Services with Schedule developed with BIPC input. (attached)

Message Date:

- RFQ issued January 18, 2023,
- RFQ due February 15, 2023,
- Consultant interviews – March 7 &8, 2023
- Final Grant approval and Scope of Services approval – July 2023

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

MCM 3: Illicit Discharge Detection and Elimination (IDDE)

Sanitary Sewer Overflows (SSOs)

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

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

Number of SSOs identified **during this reporting period: 1**

Number of SSOs removed **during this reporting period: 1**

MS4 System Mapping

- Updated system map due in Year 2 as necessary:

Provide additional status information regarding your map:

Map of storm sewer system and associated outfalls is continually updated to reflect findings and changes. Starting in 2023, the Town began mapping recorded drainage easements as a separate GIS layer.

Screening of Outfalls/Interconnections

Dry Weather Screening

- No outfalls were inspected for dry weather screening **during this report period.**
- Outfalls were inspected for dry weather screening **during this report period** and data can be found in submission.

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

Number of outfalls/interconnections screened **during this reporting period: 7**

Percent of total known outfalls/interconnections screened **to date (Year 1 – Year 5): 100**

The inventory and ranking of outfalls/interconnections was not updated during Year 5 because inspections did not indicate a need to revise inventory or ranking.

No dry weather sampling occurred due to lack of problem indicators at outfalls during dry weather screening.

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 attached to this submission.

Number of outfalls screened **during this reporting period**: 5

Percent of total known outfalls/interconnections screened **to date (Year 1 – Year 5)**: 4%

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 **and/or** at the following website.

Number of catchment investigations **during this reporting period**: No 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 5)**: 0

IDDE Progress

- No illicit discharges were found **during this reporting period**.
- Illicit discharges were found but not removed **during this reporting period**. ##Schedule for illicit discharge removal or explanation.
- Illicit discharges were removed **during this reporting period** and the illicit discharges removal report can be found in this submission.

Number of illicit discharges identified **during this reporting period**: 3 Complaints/Reports

Number of illicit discharges removed **during this reporting period**: 2

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

Total number of illicit discharges identified **since the effective date of the permit (July 1, 2018 – June 30, 2023)**: 16 (including complaints)

Total number of illicit discharges removed **since the effective date of the permit (July 1, 2018 – June 30, 2023)**: 16

Note: All illicit discharges identified start as complaints regarding a discharge to ground even if not entering a storm drain system. All are retained due to potential to discharge to a storm drain system or a wetland or surface water. Complaints investigated that did not result in identification of an actual illicit discharge are included here.

Employee Training

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

The Town of Derry DPW holds informal IDDE training on how to identify illicit discharges for Highway Division staff during weekly kickoff meetings and prior to catchbasin cleaning which started April 3, 2023. In addition, the Town of Derry routinely has discussions of current events and success stories including successful IDDE where staff identified an illegal paint disposal to the MS4 during catchbasin cleaning (Incident 2023-3). IDDE materials and training, including information on how to identify illicit discharges and SSOs are made available to applicable employees in accordance with IDDE Program Plan. Training logs are included in Appendix F of the IDDE Program Plan.

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

No formal stand-alone IDDE training was conducted during this reporting period. Instead, Stormwater and IDDE are discussed periodically during regular weekly crew meetings. IDDE refresher is discussed with individual staff involved in catchbasin cleanings.
Formal stand-alone IDDE training will occur during the next reporting period.

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:** 5 (4 commercial and 1 mixed-use)

Number of inspections completed **during this reporting period:** 57

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

The Town of Derry 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:

Procedures for inspection and enforcement of sediment and erosion control measures are included in the booklet at the link below. The booklet discusses procedures for observing construction of subdivisions and related activities being performed in the Town of Derry. The procedures are based upon the Town of Derry Zoning Ordinance, Subdivision Regulations, Site Plan Regulations, Utility Construction Specifications, and other pertinent Town Codes. It outlines the relationship between the Developer, the Developer's Contractor and Engineer and the Town of Derry.
Subdivision & Site Plan Construction Monitoring, Procedures & Checklist – January 2011
<https://www.derrynh.org/public-works/pages/forms-applications>

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

Ordinance or Regulatory Mechanism

- The Town of Derry has a regulatory mechanism(s) consistent with permit requirements 2.3.6.a.ii.

-Date regulatory mechanism was adopted: 11/18/08, Updated 5/19/21

-The regulatory document can be found at: <https://ecode360.com/7626031> Land Development Control Regulations

As-built Drawings

Number of as-built drawings received *during this reporting period*: 2

Street Design and Parking Lots Report

- During Year 4**, The Town of Derry developed a report assessing current street design and parking lot regulations to determine the feasibility of making low impact design options allowable when appropriate site conditions exist and made it available as part of the SWMP.
- No updates were recommended to the **Assessment Report** *during this reporting period*.
- No updates were made or planned to be made to **local regulations and/or guidelines** *during this reporting period*.

Green Infrastructure Reports

- During Year 4**, The Town of Derry developed a report assessing local regulations to determine the feasibility of making green infrastructure practices allowable when appropriate site conditions exist and made it available as part of the SWMP.
- No updates were made *during this reporting period* because green infrastructure practices are already allowable as outlined in the **Assessment Report**.
- No updates were made or planned to be made to **local regulations** *during this reporting period*.

Retrofit Properties Inventory

Identified permittee-owned properties that could potentially be modified or retrofitted with BMPs to reduce impervious cover in **Year 4**. The Town of Derry had originally identified the following permittee-owned properties that could potentially be modified or retrofitted with BMPs to mitigate impervious areas:

- 4 Rollins Street - Hood Pond Park
- 28 Pierce Road - Alexander Carr Park
- 1 Municipal Drive - Derry Police Department
- 131 East Broadway - Derry Central Fire Station
- 38-53 Transfer Lane - DPW Facilities (Highway Garage Vehicle Maintenance)

Report can be viewed at: <https://www.derrynh.org/sites/g/files/vyhlf3026/f/pages/phosphorus-source-identification-report-derry-final.pdf>

The Town of Derry has identified the remaining permittee-owned properties that could be modified or retrofitted with BMPs to mitigate impervious areas and of which are not included in the list below:

List of MS4 Properties: No additional properties were identified.

List of Non-MS4 Properties: None

The Town of Derry has modified or retrofitted the following MS4 property with BMPs to mitigate impervious area that were inventoried as part of 2.3.6.e as part of the permit in Year 4. Following is a list of the properties that were modified or retrofitted **during this reporting period**:

List of MS4 Properties:

- Veteran's Hall/Derry Parks and Recreation Offices – Installation of an infiltration catchbasin to capture runoff from the roof and a section of the parking lot that drained into the road causing icing issues during winter. The BMP eliminated the need for excess deicers (salt) and captured phosphorus.

List of Non-MS4 Properties: none

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

Hood Park, 4 Rollins St – No retrofits – The Town of Derry issued a Request for Proposals for Hood Park Improvements. The RFP included design and installation of stormwater BMPs and a pond fountain with the park improvements. The RFP closed on April 14, 2023. There were no bidders. The Town has postponed the improvements until a decision is made to either rebid the project or have the Town act as its own general contractor.

Derry Central Fire Station – No retrofits – The Derry Fire Department will be constructing a new central fire station at an alternate location. The new Central Fire Station will include full stormwater treatment that meets current stormwater BMP requirements and regulations. The Town’s engineering department has already reviewed the draft design. Once vacated, any redevelopment of the former Central Fire Station will require stormwater BMPs installed that meet current code requirements.

Derry Police Department. 1 Municipal Drive – No Retrofits – The new Exit 4A connector road to Interstate 93 will impact the Derry Police Department property with a partial property taking and a new police department access road yet to be configured and designed. The original Exit 4A Engineering Design was at 60% design as of October 2022 and includes numerous stormwater BMPs along the connector road in the form of detention ponds. Final design is scheduled to be completed by November 2023, with construction currently scheduled to begin in Spring 2024.

As described in the Town’s retrofit inventory report, several remaining Town-owned properties are already equipped with stormwater BMPs or have minimal impervious surface such as recreation fields that follow operational BMPs including use of non-phosphorus fertilizer.

MCM 6: Good Housekeeping

Catch Basin Cleaning

- Stored and disposed of catch basin cleanings so they did not discharge to receiving waters.
- Report on the actions taken if a catch basin sump is more than 50% full during two consecutive routine inspections/cleaning events:
 - A schedule for catch basin cleaning has been established with the goal of ensuring that a catch basin should not be more than 50% full. Select catchbasins in specific areas and in the urban compact are now included in regular cleanings.

Number of catch basins inspected **during this reporting period:** 750

Number of catch basins cleaned **during this reporting period:** 750

Total volume or mass of material removed from **all** catch basins **during this reporting period:** 15 cubic yards

Total number of catch basins within the MS4 system: 3168

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.

Number of (lane) miles swept **during this reporting period:** 94 (at least once)

80 curbed lane miles within urban compact – minimum once/year

- 12 arterial lane miles – once/week (April-November)
- 1.6 lane miles (Transfer Station) – weekly during summer
- 2.9 Acres of municipal parking lots – twice/year

Volume of swept material **during this reporting period:** ~50 cubic yards

Stormwater Pollution Prevention Plan (SWPPP)

- 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:** 12

Inspections are performed by the environmental Coordinator accompanied by the specific facility crew chief.

- Vehicle Maintenance Facility

- Highway Garage, Salt Storage Facility, Salt Spreader storage building
- Water/Wastewater Facility
- Transfer Station

Number of corrective actions taken **during this reporting period**: none

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

No corrective actions necessary.

Operations and Maintenance (O & M) Programs

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

Implemented all maintenance procedures for permittee owned facilities in accordance with O&M programs.

Updated inventory of all permittee owned facilities as necessary.

All permittee owned facilities, including an inventory, are included in our SWMP. There were no changes to report during Year 5.

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:

Not applicable

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* and can be found in at the following website:
https://www.derrynh.org/sites/g/files/vyhlf3026/f/pages/derry_crp_2022september-final.pdf
 - The Municipal Green SnowPro Certification Program bill was passed during the 2021 legislation session. NHDES developed rules and regulations *during this reporting period*. Final approval of the rules and regulations is anticipated in 2023/2024.
 - Reported amount of salt applied to all municipally-owned and maintained surfaces by completing the New Hampshire DES Annual Salt Usage reporting form and submitting it to NHDES, and can be found in submission. The UNH Technology Transfer Center online tool is non-functional and has been for several years.

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

Not applicable

Nitrogen Impairment (Appendix H)

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

Phosphorus Impairment (Appendix H)

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

- Permittee **has** a phosphorus impairment.

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

Phosphorus Source Identification Report- Update

Structural BMPs

- The Phosphorus Source Identification Report was updated during this reporting period and can be found at the following website:
<https://www.derrynh.org/sites/g/files/vyhlf3026/f/pages/phosphorus-source-identification-report-derry-final.pdf>. The updates to the Phosphorus Source Identification Report can be found in *Section 2: Potential Structural BMPs Report (Year 5)* and include the following:

- 1.) Completed the evaluation of all permittee-owned properties identified as presenting retrofit opportunity or areas for structural BMP installation under permit part 2.3.6.d as identified in the Phosphorus Source Identification Report update that are within the drainage area of the impaired water or its tributaries. The report includes the next planned infrastructure, resurfacing, or redevelopment activity planned for the property (if applicable) or planned project; Estimated cost of redevelopment or retrofit BMPs, and; Engineering and regulatory feasibility of redevelopment or retrofit BMPs.
 - 2.) Completed a listing of planned structural BMPs and a plan and schedule for implementation.
 - 3.) Method of tracking and accounting for phosphorus, and metrics associated with individual BMPs.
- Structural BMPs listed in Attachment 3 to Appendix F already existing or installed in the regulated area by the Town of Derry or its agents was tracked and the phosphorus removal by the BMP was estimated consistent with Attachment 3 to Appendix F. The BMP type, total area treated by the BMP, the design storage volume of the BMP, and the estimated phosphorus removed in mass per year by the BMP were documented in *Section 2: Potential Structural BMPs Report (Year 5)* of the Phosphorus Source Identification Report. The total estimated phosphorus removed from the installed BMP(s) is (to be determined).
- No BMPs were installed **during this reporting period**. The implementation schedule is outlined in *Section 2: Potential Structural BMPs Report (Year 5)* of the Phosphorus Source Identification Report. The total estimated phosphorus removed from the installed BMP(s) is 0 lbs/year.

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

There are only 3 municipally owned properties identified in phosphorus impaired watershed, two of which identified as possible retrofit opportunities but with vegetated swales pre-existing. The third is a vacant property retrofitted with a subsurface infiltration structure capturing runoff from unpaved road in a residential development near Big Island Pond. The remaining two properties, East Derry Firs Station (Big Island Pond watershed) and Gallien’s Beach (Beaver lake Watershed) each have pre-existing vegetative treatment swales.

The Town of Derry with support of the Big Island Pond Corporation applied for and received a CWSRF Grant for development of a Watershed-Based Management Plan (WMP) for Big Island Pond. The WMP Scope of Services includes development of an Action plan with regulatory and non-structural recommendations, implementation schedule, and milestones along with designs for up to six priority SCMs/BMPs. These tasks are scheduled for completion in fall 2024.

The Town of Derry has not completed its review and assessment of existing BMPs in order to calculate estimated phosphorus removed per year. The Town anticipates completing these estimated within the next reporting year.

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**. ##MUNICIPALITY street sweeping schedule can be found in submission **and/or** at ##website.

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

Not applicable

Chloride TMDL (Appendix F)

- Permittee **does not** have a chloride TMDL.
- Permittee **has** a chloride TMDL.
 - Fully implemented Chloride Reduction Plan **during this reporting period** and can be found in at the following website:
https://www.derrynh.org/sites/g/files/vyhlf3026/f/pages/derry_crp_2022september-final.pdf

The Municipal Green SnowPro Certification Program bill was passed during the 2021 legislation session. NHDES developed rules and regulations **during this reporting period**. Final approval of the rules and regulations is anticipated in 2023/2024.
 - Reported amount of salt applied to all municipally-owned and maintained surfaces by completing the New Hampshire DES Annual Salt Usage reporting form, submitting it to NHDES, and can be found in submission. The UNH Technology Transfer Center online tool is non-functional and has been for several years.

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

Lake and Pond Phosphorus TMDL (Appendix F)

- Permittee **does not** have a lake and pond phosphorus TMDL.
- Permittee **has** a lake and pond phosphorus TMDL.
- The Town of Derry completed a written Lake Phosphorus Control Plan **during the reporting period**. The completed plan includes items 1-8 in Appendix F, Table F-3 and can be found in submission **and/or** at the following website. The plan is available to the public at ##website and/or facility and physical location.
 - During Years 1-4**, The Town of Derry completed the following items 1-4 of the Lake Phosphorus Control Plan and as outlined in Appendix F, Table F-3: 1.) Legal analysis, 2.) Funding source assessment, 3.) Define LPCP scope (LPCP area), and, 4.) Calculated baseline phosphorus, allowable phosphorus load and phosphorus reduction requirement. The documents can be found at the following website:
<https://www.derrynh.org/sites/g/files/vyhlf3026/f/pages/phosphorus-source-identification-report-derry-final.pdf>.

The Town of Derry may be utilizing the resources developed by the New Hampshire Stormwater Coalition. Resources have been developed but the written Lake Phosphorus Control Plan template was not available **during this reporting period**. The New Hampshire Stormwater Coalition is in the process of finalizing the written Lake Phosphorus Control Plan template during the summer of 2023 and is offering a workshop on August 21, 2023, for permittees to obtain information on how to fill out the template and associated spreadsheets. The Town will complete a written Lake Phosphorus Control Plan during Year 6 or by the end of December 2024 and provide an update on the progress in the Year 6 Annual Report. The town of Derry's plan will be available to the public once it is completed on the Town's website.

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

The Town of Derry has not finished the Lake Phosphorus Control Plan for Hood Pond. During the reporting year, the Town applied for and was awarded a Clean Water State Revolving Loan Fund of \$100,000 to prepare a Watershed-Based Management Plan and the Lake Phosphorus Control Plan. The Town advertised, interviewed, and selected a consultant through a Qualification Based Selection Process. The Request for Qualifications process was delayed due to a lack of submittals by the original closing date. Following an extension, submittals were received, and Comprehensive Environmental Inc. was selected. The SRF Loan Agreement was approved and received by the Town

of Derry on September 1, 2023. The Watershed-Based Management Plan and the Lake Phosphorus Control Plan are both scheduled to be completed by December 2024. The NHDES approved Scope of Services with proposed schedule is attached to this submission.

Data for Hood Pond and its tributaries has been limited to 2 samples collected in 1997 and 2011 to develop the TMDL. Due to likely administrative delays to approve the SRF after which CEI may begin work, the Town initiated surface water sampling of Hood Pond and selected tributaries that would mirror the VLAP program and to aid in developing Hood Pond's first baseline monitoring. Sampling is conducted monthly from May through September and included field testing for pH, conductivity, dissolved oxygen and saturation, turbidity, temperature, and clarity (deep spot secchi disc measurement) and laboratory analysis of total phosphorus, chloride, e-coli (count), and chlorophyll-*a* (deep spot only). During the program, the Town extended surface water sampling up certain tributaries segments to provide additional data and identify problem tributaries and catchments. Data collected during the reporting period is attached to this submittal.

The Town reached out to NHDES VRAP and VLAP programs but due to lack of volunteers to sample throughout the summer with the Town support was not provided. The Town reached out to Next Charter School and Pinkerton Academy for student volunteers. Next Charter School would not have students available for the summer. Town participates in spring semiannual Science Advisory Board meetings at Pinkerton Academy and requested student volunteers. No Pinkerton Academy students came forward in spring 2023. The Town hired a University of New Hampshire student to intern with the Town and assist with the data collection.

The Town focused much of its wet weather outfall sampling in the Hoods Pond Watershed. This will help identify primary problems areas that are contributing to surface water phosphorus impairments and evaluate areas that will be addressed by the Interstate 93 Exit 4A connector road. The new Exit 4A connector road will bisect the Hood Pond watershed a short distance upstream of Hood Pond. The Town has already contributed \$5M to the project. A 60% design as of October 2022 has been completed by NHDOT contractor and includes no less than six stormwater BMP (wet detention ponds and treatment swales) in the immediate upstream watershed catchments of Hood Pond. A summary of proposed BMPs is included in the attached summary memo prepared by Fuss & O'Neil on behalf of NHDOT. Upon completion of the project, the Town will take ownership and operation & maintenance responsibilities for these BMPs. The 60% Design Plan is attached to this submittal. At least four of the Town's outfall catchments where stormwater discharges occur upstream of Hoods Pond without treatment will be rerouted to a new Exit 4A stormwater BMP detention Ponds. The scheduled for construction is as follows: Design completion October 2023, Project bidding - November 2023-February 2024, Project construction March 2024-June 2026.

The Town further assessed select catchments in the immediate vicinity of Hood Pond to determine phosphorus contribution. This will further determine phosphorus removal from catchments being

captured by the Exit 4A project and that for which additional consideration is to be given for BMP installation. The catchments evaluated and phosphorus calculations are attached to this submission.

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 this submission.

If such monitoring or studies were conducted on your behalf or if monitoring or studies conducted by other entities were reported to you, a brief description of the type of information gathered or received shall be described below:

Data collected included wet weather sampling of outfalls, surface water and tributary sampling to support Hood Pond watershed Management Plan and Lake Phosphorus Control Plan, and chloride testing of Beaver Brook under a separate state monitoring permit.

Description of Any Changes in Identified BMPs or Measurable Goals

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

Activities Planned for Next Reporting Period

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