

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

LONDONDERRY

Permit Year 3

July 1, 2020, through June 30, 2021

EPA NPDES Permit Number NHR041016

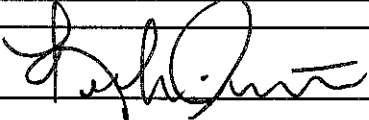
Certification

"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 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

Kevin H. Smith

Signature



Date

9/24/21

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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 Londonderry 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.londonderrynh.org/sites/g/files/vyhlf4616/f/uploads/swmp.pdf>

IDDE: Located within the SWMP above as Appendix E

MCM1 - Public Education and Outreach

Year 3 Activities

BMP 1A: Pet Waste Disposal (2 flyers)

Document Name and/or Web Address:

"Dog Waste and Surface Water Quality " and "Pet Waste and Water Quality" flyers
<http://www.londonderrynh.org/engineering-division/pages/storms-stormwater>

Description:

Distribution and promotion of " Dog Waste and Surface Water Quality " A bifold brochure stating the problem with dog waste, highlighting the benefit of cleaning up and properly disposing of dog waste, and encouraging dog owners to voluntarily clean up after their dog.

Distribution and promotion of "Pet Waste and Water Quality" flyer with proper pet waste management, impacts of improper management, and disposal requirements messaging.

Targeted Audience:

Residents - Pet Owners

Measurable Goal(s):

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

The number of flyers taken under Year 3 is **19**.

Goal was achieved.

Message Date: June 20, 2019, and ongoing. Additional message for year 3 was not developed due to COVID-19. New message posted on September 16, 2021.

BMP 1B: Grass and Fertilizer (2 flyers)

Document Name and/or Web Address:

"Green Grass & Clear Water Brochure" and "Stormwater Pollution Education: Fertilizing the Lawn" flyers:
<http://www.londonderrynh.org/engineering-division/pages/storms-stormwater>

Description:

Distribution and promotion of "Green Grass & Clear Water" four-fold flyer 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 and/or Business and Institutions

Measurable Goal(s):

Number of flyers taken: Lawn care enthusiasts' 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.

The number of flyers taken under Year 3 is **12**.

Goal was achieved.

Message Date: June 20, 2019, and ongoing. Additional message for year 3 was not developed due to COVID-19.

BMP 1C: Get Pumped (Septic System Maintenance) brochure

Document Name and/or Web Address:

<http://www.londonderrynh.org/engineering-division/pages/storms-stormwater>

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.

The number of flyers taken under Year 3 is **10**.

Goal was achieved.

Message Date: September 23, 2019, and ongoing. Additional message for year 3 was not developed due to COVID-19. New message posted on September 20, 2021

BMP 1D: Rake It or Leave It

Document Name and/or Web Address:

<http://www.londonderrynh.org/engineering-division/pages/storms-stormwater>

Description:

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

Targeted Audience:

Residential &/or 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.

The number of flyers taken under Year 3 is **12**.

Goal was achieved.

Message Date: November 5, 2019, BMP placed on website and ongoing. Additional message for year 3 was not developed due to COVID-19.

BMP 1F: Developer/Construction Outreach (renamed from NOI)

Web Address: TBD

Description:

Review checklist with Developers and Construction Contractors prior to beginning of construction project (pre-construction) to identify responsible parties, erosion control practices, other best management practices, and requirements for EPA Construction General Permit as appropriate.

Targeted Audience:

Developer/Construction

Measurable Goal(s):

Contractors and Developers are aware of the need for proper erosion control practices during construction work.

The Department held a total of 5 pre-construction meetings for site development construction projects. The site development projects represent 100% of projects that received prior board approval and began construction during this reporting period.

Goal was achieved.

Message Date:

Ongoing. New message posted on September 20, 2021

BMP 1G: Stormwater – What you can do as a Citizen

Document Name and/or Web Address:

<http://www.londonderrynh.org/engineering-division/pages/storms-stormwater>

Description:

Distribute and promote informational flyer, identifying steps to reduce an individual's impact on stormwater and the environment such as rain gardens, rain barrels, etc.

Targeted Audience:

Residential &/or Business and Institutions

Measurable Goal(s):

Number of flyers taken. Residents and businesses are aware of steps to reduce stormwater impacts the environment.

The number of flyers taken under Year 3 is **10**.

Goal was achieved.

Message Date: June 2019 BMP placed on website and ongoing.

MCM2 - Public Participation

Year 3 Activities

BMP 2A: Public Review of Stormwater Management Plan

Description: The Stormwater Management Program (SWMP) was revised in September 2019 and is available for public review at the Town of Londonderry Department of Public Works and Engineering at the Town offices during normal business hours. The document was made available in Year 3 and can be publicly reviewed at the following web address:

<https://www.londonderrynh.org/sites/g/files/vyhlf4616/f/uploads/swmp.pdf>

Measurable Goal(s): Allow public review of Stormwater Management Plan **Goal was achieved.**

BMP 2B: Public Participation in Stormwater Management Program

The SWMP is available at the Town of Londonderry Department of Public Works and Engineering during normal business hours for review and comment.

Documents and records relating to the permit are retained and available for 5 years to the public at Londonderry Department of Public Works and Engineering at the Town offices

Measurable Goal(s): The Town of Londonderry did not receive any public comments during the reporting period. Records were retained and maintained. **Goal was achieved.**

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

Document Link or Reference:

<https://www.londonderrynh.org/environmental-services-solid-waste>

Description:

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

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

The Town of Londonderry provides monthly used oil collection dates. The dates of the collection are posted on the Department of Public Works & Engineering website.

Targeted Audience: Residents

Measurable Goal(s):

Conducted Household Hazardous Waste Collection on Nov 14, 2020, and May 15, 2021

Conducted Used Oil Collections in Nov 2020, May 2021, and June 2021. Due to COVID-19, the number of collections were impacted during the reporting period.

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

Virtual Partnership with the City of Manchester occurred during the report period. Due to Covid -19, partnership with the City was impacted. Resumption is anticipated in the following year in accordance with the accepted NOI. Partnership with the Manchester Airport has not begun.

BMP 2E: Partnership – Advocacy Groups

Virtual and in-person partnership meetings occurred during the reporting period. Due to Covid -19, partnership meetings were impacted. Resumption is anticipated to occur in the following year (year 4) in accordance with the accepted NOI.

BMP 2F: Partnership with NHDOT

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

BMP 2G: Cleanups – Roadside/General

"Beautify Londonderry" roadside cleanup program occurred on April 24, May 1, and May 8, 2021.

MCM3 – Illicit Discharge Detection and Elimination

Year 3 Activities

BMP 3A: IDDE Legal Authority

The municipality has established legal authority in 2019 as outlined in the draft IDDE plan.

BMPs 3B, 3E and 3F: IDDE Program (Screenings of Outfalls/Interconnections, Catchment Investigations, and IDDE Progress)

Zero outfalls and interconnections (excluding problem and excluded outfalls) were inspected and screened in the reporting period. In August 2021 (beyond reporting period), 20 outfall locations were inspected and screened that will be included in the Year 4 reporting with others anticipated to be inspected and screened in Year 4. Outfall catchments and interconnections priority ranking will be updated based on the information collected during the dry weather inspections. A written IDDE plan has been developed, including written catchment investigation procedures, and will be updated.

Outfall identification, characterization and prioritization information will be updated and included in the IDDE plan based on dry weather sampling.

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

Number of dry weather outfall investigations/screenings: 0

Number of dry weather samples taken: 0

Number of wet weather outfall inspections/sampling events: 0

Number of wet weather samples taken: 0

Number of catchment investigations: 0

Number of illicit discharges: 0

Number of illicit discharges removed: 0

Estimated gallons of flow removed: 0 gallons

BMP 3C: Sanitary Sewer Overflow (SSO) Inventory

The Town of Londonderry does not have any SSOs

Number of SSO's identified Year 3: 0

Number of SSO's removed Year 3: 0

BMP 3D: Map of Storm Sewer System

Map of storm sewer system and associated outfalls is in progress but has not been completed at this time under year 3. Due to COVID-19, the Town did not hire staff/interns to conduct additional mapping during the spring of year 3. The mapping was not completed. The Town is still progressing, in accordance with the accepted NOI, to update and complete the mapping and incorporate into the current Town wide map in year 4.

BMP 3G: Employee Training

Londonderry staff were not trained in reporting period year 3 and will be training in the next reporting period using IDDE training videos created by UNH, the City of Dover, and NHDES. A video addressing the issues associated with stormwater, common pollutants of concern, how to identify an illicit discharge, and general IDDE sampling protocols is being prepared by NHDES. The video is estimated to be finalized and available to permittees in August 2021. Training logs will be included in the IDDE report.

In addition, as a routine, IDDE materials and training, including information on how to identify illicit discharges and SSOs will be made available to applicable employees in accordance with IDDE plan.

MCM4 – Construction Site Stormwater Runoff Control

Year 3 Activities

A written site inspection and enforcement program for erosion and sediment control measures

will be developed and included in our SWMP.

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

Number of site plan reviews completed: 17

Number of inspections: 543

Number of enforcement actions: 0

MCM5 – Post Construction Stormwater Management in New Development and Redevelopment

Year 3 Activities

BMP 5A: 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 developed. Submission requirements for stormwater management reports and plans are included in local regulations and can be found at: <https://www.londonderrynh.org/planning-economic-development/pages/land-use-regulations-applications> The regulations require that all applications shall include a Stormwater Management Plan (SMP). The SMP shall include a narrative description and an Existing Conditions Site Plan showing all pre-development impervious surfaces, buildings, and structures; surface water bodies and wetlands; drainage patterns, sub-catchment, and watershed boundaries; building setbacks and buffers, locations of various hydrologic group soil types, mature vegetation, land topographic contours. Additional submissions include as-built plans and inspection and maintenance plans for all permanent stormwater control measures. As-built drawings are required to be submitted upon completion of the project to obtain an occupancy permit and obtain a bond release. In general, the as-built plans are submitted within 1 year of completion. An amendment to the regulations is currently being developed to include a 2 year time limit to submit the as-built upon completion.

BMP 5B: List of Municipal Retrofit Opportunities (due in year 4)

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

BMP 5C: Green Infrastructure Report (due in year 4)

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

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

The Town adopted a Stormwater Ordinance in September 2019 and was beginning to review and update the regulations to incorporate the Ordinance, but was not completed in the year 3 reporting period due to COVID-19 protocols imposed by local, state, and federal agencies took precedence during the reporting year. The Town is still progressing to complete and incorporate the Ordinance into the current regulations in year 4. As part of the 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 Lower Merrimack Valley Stormwater Coalition is in the process of working with a selected engineering group 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 reviewed by Londonderry.

MCM6 – Good Housekeeping and Pollution Prevention for Permittee Owned Operations

Year 3 Activities

BMP 6A: Permittee Owned Facilities Inventory

All permittee owned facilities, including inventories, have been included with the appropriate BMPs and will be included in the Fall 2021 SWMP update. The facility inventories were completed during Year 3.

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

O&M programs and procedures for all permittee owned facilities have been completed during Year 3 and will be included in the Fall 2021 SWMP update. All maintenance procedures will be implemented for permittee owned facilities in accordance with O&M programs.

BMP 6E: 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.

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

Number of catch basins within MS4 regulated area: 2,500+/-

Number of catch basins inspected in accordance with the SWMP: 2,500+/-

Number of catch basins cleaned: 1750+/-

Total volume of material removed: 300+/- CY

BMP 6F: Street Sweeping Program

A street sweeping program has not been established such that all streets with curbing and/or catch basins and permittee-owned parking lots are swept in accordance with permit conditions. The Town is in the process of developing and issuing an RFP to contract with a private contractor to sweep all curbed roadways and municipal parking lots annually. Street sweepings will be properly stored and disposed so that they did not discharge to receiving waters once established.

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

Number of (lane) miles swept: 0

Volume of swept material: 0 CY

BMP 6G: Stormwater Treatment Structures Inspection and Maintenance Procedures

An Inspection and Maintenance procedure draft document for the Stormwater Treatment Structures with an inventory listing has been developed. However, the procedures were not completed within the year 3 permit reporting period due to COVID-19. The Town is still progressing to incorporate the procedures in the SWMP and begin implementation of the procedures under year 4.

Londonderry continues to collect information with a goal of inventorying and formally inspecting all municipally owned BMPs. During the reporting period, three stormwater basins were maintained. Any BMPs that are safety related, or are flooding hazards are dealt with as needed.

BMP 6H: Winter Road Maintenance Program

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

Londonderry has adopted a Salt Reduction Plan in accordance with Appendix H that has been implemented in the MS4 regulated area and/or community-wide. The Londonderry Salt Reduction Plan can be found at:

https://www.londonderrynh.org/sites/g/files/vyhlf4616/f/uploads/londonderry_srp_final_with_appendices_07-16-10_-_updated_july_26_2019.pdf

BMP 6I: SWPPP

SWPPPs were prepared for the following facilities: DPW Maintenance Garage and Drop-Off Center where pollutants are exposed to stormwater and currently under final review prior to implementation.

Inspections were not conducted in the Year 3 reporting period, but are anticipated after final SWPPP approval and implementation.

Number of site inspections for facilities that require a SWPPP completed (Year 3): 0

Number of corrective actions identified (Year 3): 0

Number of corrective actions taken (Year 3): 0

TMDL's and Water Quality Limited Waters

Year 3 Activities

Bacteria/Pathogens

Outfalls to these receiving waters have been ranked as high priority for the IDDE implementation in the initial outfall ranking. Dry weather sampling of the outfalls within the area identified in the permit has begun (beyond the reporting period). Sampling results will be included in the year 4 reporting.

Chloride

Outfalls to these receiving waters have been ranked as high priority for the IDDE implementation in the initial outfall ranking. Dry weather sampling of the outfalls within the area identified in the permit has begun (beyond the reporting period). Sampling results will be included in the year 4 reporting.

Tracking of the amount of salt applied to all municipally owned and maintained surfaces, and reporting of salt use has been completed either using the [UNH T2 online tool](#) or the [New Hampshire DES MS4 annual salt usage reporting form](#).

Londonderry 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.

Implemented Chloride Reduction Plan or Alternative Chloride Reduction Plan which can be found at [https://www.londonderrynh.org/sites/g/files/vyhli4616/f/uploads/londonderry_srp_final_with_appendices_07-16-10 - updated july 26 2019.pdf](https://www.londonderrynh.org/sites/g/files/vyhli4616/f/uploads/londonderry_srp_final_with_appendices_07-16-10_-_updated_july_26_2019.pdf)

Additional Required Information

Monitoring or Study Results

No additional monitoring or studies were completed within the reporting period.

Stormwater water quality sampling has begun after the reporting period.

Description of Any Changes in Identified BMPs or Measurable Goals

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

- BMP 1F was renamed from the NOI application to Developer/Construction Outreach to be more consistent with the permit under 2.3.2.2 (MCM 1).
- Updates to the Town regulations relative to construction stormwater runoff under BMPs 4A-4C were not developed during the reporting period due to COVID-19. The Town is still progressing to complete the updates to the regulations and incorporate the recently adopted Stormwater Ordinance into the regulations (MCM 4).
- A post construction as-built guideline has been developed but updates to the Town regulations relative to as-built plans for stormwater facilities under BMP 5A were not developed during the reporting period due to COVID-19. The Town is still progressing to complete the updates to the regulations and incorporate the checklist and recently adopted Stormwater Ordinance into the regulations (MCM 5).
- The Town has conducted catch basin inspection and cleaning, as needed, of all catch basins located in the MS4 area during the reporting period. The development of a form to log the catch basins cleaned and inspected including volume of material removed was delayed due to COVID-19. The Town is still progressing in development of a form to log the catch basins cleaned. (BMP 6E).
- The development of a street sweeping program did not occur during the reporting period and was delayed. The Town historically has not had issues/concerns with sediment and currently does not conduct this specific activity town wide. The Town is still progressing and is currently developing a draft street sweeping program as noted in the NOI application (BMP 6F).

Activities for the Next Reporting Cycle

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