

Year 4 Annual Report
New Hampshire Small MS4 General Permit
Reporting Period: July 1, 2021 - June 30, 2022
LONDONDERRY

EPA NPDES Permit Number NHR041016

Certification of Small MS4 Year 4 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

Title

Signature 

Date

Primary MS4 Program Manager Contact Information:

Name: John R. Trottier, PE Title/Position: Director of Engineering & Environmental Services

Department: Londonderry Department of Public Works & Engineering

Street Address: 268B Mammoth Road

City: Londonderry

State: New Hampshire

Zip Code: 03053

Email: jrtrottier@londonderrynh.org Phone Number: 432-1100 x146

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, 2021 through June 30, 2022** 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 and other pertinent Year 4 information can be found in submission or at the following websites, and will be referred to throughout this report:

SWMP: <https://www.londonderrynh.org/sites/g/files/vyhli4616/f/uploads/swmp.pdf>

Date SWMP was Last Updated: Sept 2022

IDDE Program Plan: Located within SWMP above as Appendix E

SSO Inventory: No SSO's have occurred

Dry Weather Screening Data: See attached "Londonderry Water Quality Results August 2021" submission

Inventory and Ranking of Outfalls/Interconnections: See attached "Londonderry Stormwater Outfall Inventory Locations updated September 2022" submission

Wet Weather Screening Data: None conducted during reporting period

Catchment Investigation Data: None conducted during reporting period

Illicit Discharge Removal Report: None conducted during reporting period

Salt (Chloride) Reduction Plan: See attached "Londonderry_spr_final_with_appendices_07-16-10_-_updated_july_26_2022" submission

Results from additional stormwater or receiving water quality monitoring reports or studies:
None conducted during reporting period

Self-Assessment

Select the impairment(s) and/or TMDL(s) that are applicable to your MS4. Make sure you are referring to the 2018 EPA approved Section 303(d) Impaired Waters List which was used for the Year 4 reporting period and can be found here:

<https://www.des.nh.gov/sites/g/files/ehbemt341/files/documents/2020-01/2018-epa-approval-20200225.pdf>.

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 type="checkbox"/> Phosphorus	<input type="checkbox"/> Solids/ Oil/ Grease (Hydrocarbons)/ Metals	
TMDL(s)		
<input type="checkbox"/> Bacteria and Pathogens	<input checked="" type="checkbox"/> Chloride	<input type="checkbox"/> Lake and Pond Phosphorus

Receiving Waters/Impaired Waters/TMDL

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

No

Londonderry has not made changes to the list of receiving waters, outfalls, or impairments since the NOI submission. However, as part of the IDDE assessment currently being conducted, a reduction in the total number of outfalls is anticipated for the next reporting period.

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

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

Minimum Control Measures

MCM 1: Public Education and Outreach

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

Year 4 Activities

BMP 1A: Pet Waste Disposal (1 new flyer)

Outreach Resources:

"Please, Scoop the Poop" flyer:

https://www.londonderrynh.org/sites/g/files/vyhlif4616/f/imce/u196/please_scoop_the_poop_sept.16.2021.jpg

<https://www.londonderrynh.org/engineering-division/pages/stormwater-information>

Description:

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

Continued Distribution and promotion of previous " Dog Waste and Surface Water Quality " flyer.

Continued Distribution and promotion of previous "Pet Waste and Water Quality" flyer

Targeted Audience:

Residents - Pet Owners

Responsible Department/ Parties:

Engineering and Environmental Services

Measurable Goal(s):

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

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

Year 4 = 5

Goal was achieved.

Message Date: September 16, 2021 (latest), previously June 20, 2019 and ongoing

BMP 1B : Grass and Fertilizer

Outreach Resources:

“Green Grass & Clear Water Brochure” and “Stormwater Pollution Education: Fertilizing the Lawn” flyers:

<https://www.londonderrynh.org/engineering-division/pages/stormwater-information>

Description:

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

Targeted Audience:

Residential and/or Business and Institutions

Responsible Department/ Parties:

Engineering and Environmental Services

Measurable Goal(s):

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. Measurement includes quantity of materials distributed.

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

Year 4 = 0

Goal was achieved.

Message Date: June 20, 2019, and ongoing. Additional message for year 3 was not developed due to COVID-19 and was not updated for year 4.

BMP 1C: Septic System Maintenance (1 New Flyer)

Outreach Resources:

“ Do your Part – Be Septic Smart” Flyer:

https://www.londonderrynh.org/sites/g/files/vyhlf4616/f/uploads/do_your_part_-_be_septic_smart_-_sept_2021_1.pdf

<https://www.londonderrynh.org/engineering-division/pages/stormwater-information>

Description:

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

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

Targeted Audience:

Septic System Owners

Responsible Department/ Parties:

Engineering and Environmental Services

Measurable Goal(s):

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

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

Year 4 = 2

Goal was achieved.

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

BMP 1D: Rake it or Leave it (Disposal of Leaf and Grass Clippings)

Outreach Resources:

“Rake it or leave it” flyer:

<https://www.londonderrynh.org/engineering-division/pages/stormwater-information>

Description:

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

Targeted Audience:

Residential &/or Business and Institutions

Responsible Department/ Parties:

Engineering and Environmental Services

Measurable Goal(s):

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

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

Year 4 = 4

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 and was not updated for year 4.

BMP 1E: Stormwater Pollution for Industrial Facilities (renamed from NOI) (New Flyer)

Outreach Resources:

“Stormwater Pollution for Industrial Facilities” Fact Sheet:

https://www.londonderrynh.org/sites/g/files/vyhlif4616/f/imce/u196/stormwater_pollution_control_for_industrial_facilities_-_sept_2021_0.jpg

Description:

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

Targeted Audience:

Industrial Facilities and/or Business and Institutions

Responsible Department/ Parties:

Engineering and Environmental Services

Measurable Goal(s):

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

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

Year 4 = 1

Goal was achieved.

Message Date: Sept 20, 2021 and ongoing

BMP 1F: Construction/Developers Outreach

Outreach Resources:

https://www4.des.state.nh.us/nh-ms4/?page_id=54

Description:

Provide the Construction General Permit outreach letter and brochure to developers, construction contractors, and other municipal or local organizations to educate them on both the new and updated requirements within the EPA 2022 Construction General Permit.

Targeted Audience:

Construction/ Developers

Responsible Department/ Parties:

Engineering and Environmental Services

Measurable Goal(s):

Contractors, developers, and municipal or local organizations are made aware of the updates and changes made to the EPA 2022 Construction General Permit including the requirement that those who wish to be considered a qualified person to conduct inspections must meet EPA training standards. Contractors and developers are also made aware of the need for proper erosion control practices during construction work.

Following is the number of brochures that were distributed to municipal or local organizations ***during this reporting period:***

Year 4 = 0

Londonderry held 6 pre-construction meetings, representing 21% of projects that received planning board approval and began construction ***during this reporting period.***

Goal was achieved.

Message Date: September 2022

BMP 1G: Storm Water Business - The Drain is Just for Rain (New Flyer)

Outreach Resources:

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

https://www.londonderrynh.org/sites/g/files/vyhlif4616/f/uploads/stormwater_business_-_sept_17_2021_0.pdf

Continued distribution and promotion of previous “Stormwater – What you can do as a Citizen” flyer:

<https://www.londonderrynh.org/engineering-division/pages/stormwater-information>

Description:

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

Targeted Audience:

Residential &/or Business and Institutions

Responsible Department/ Parties:

Engineering and Environmental Services

Measurable Goal(s):

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

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

Year 4 = 200

Goal was achieved.

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

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

The planned outreach for industrial and businesses was not completed in year 3 due to Covid-19 and was completed in year 4. Outreach for Construction/Developers was not completed during year 4. Prior outreach information has been saved and retained on the Town's Stormwater site. BMP 1E was renamed from the NOI, as noted above, and outreach material provided to the public.

MCM 2: Public Participation

Year 4 Activities

BMP 2A: Public Review of Stormwater Management Plan

Description:

The Stormwater Management Program (SWMP) was updated in September 2022 and will be available for public review at the Town of Londonderry Department of Engineering and

Environmental Services at the Town offices during normal business hours. The previous SWMP document was made available in Year 3 and can be publicly reviewed at the following web address:

<https://www.londonderrynh.org/engineering-division/pages/stormwater-information>

Measurable Goal(s):

Allow public review of Stormwater Management Plan

Goal was achieved.

BMP 2B: Public Participation in Stormwater Management Program

- Provided an opportunity for public participation in review and implementation of SWMP and complied with State Public Notice requirements as described in the Londonderry SWMP.
- Kept records relating to the permit available for 5 years and made available to the public

Describe the opportunity provided for public involvement in the development of the Stormwater Management Program (SWMP) *during this reporting period*:

Description: The Stormwater Management Program (SWMP) was publicly available for review at the Town Hall in addition to the web address noted above. Documents and records relating to the permit are retained and available for 5 years to the public at Town Hall.

Measurable Goal(s):

No Public Input was received, and records are maintained.

Goal was achieved.

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

Outreach Resources:

<https://www.londonderrynh.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 May this year for residents of both towns. The event allows residents of each town to dispose of household hazardous waste legally and properly from their home. The event is also used to spread outreach materials directly to residents. Outreach brochures promoting health and safety and HHW reduction typically include:

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

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

Targeted Audience: Residents

Measurable Goal(s):

Conducted Household Hazardous Waste Collection on Nov 13, 2021, and May 21, 2022

Conducted Used Oil Collections on: 8/7/21, 9/4/21, 11/6/21, 11/13/21, 12/4/21, 3/5/22, 4/2/22, 5/7/22, 6/4/22.

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.

Recent coordination with the Manchester Airport has occurred in year 4 with a municipal roadway reconstruction project occurring adjacent to the Airport.

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 5) in accordance with the accepted NOI.

BMP 2F: Partnership with NHDOT

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

BMP 2G: Cleanups – Roadside/General

“Beautify Londonderry 2022 ” roadside cleanup program occurred on April 23, April 30, May 7, and June 6, 2022. Roadside cleanup events preformed by private companies also occurred in April 2022.

Public involvement or participation opportunities are ancillary to daily operations.

MCM 3: Illicit Discharge Detection and Elimination (IDDE)

Year 4 Activities

BMP 3B: IDDE Progress

Illicit discharges were found *during this reporting period*.

The illicit discharges removal report can be found in submission

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

Number of illicit discharges removed *during this reporting period*: 0

Estimated gallons of flow removed *during this reporting period*: 0 gallons/day

Total number of illicit discharges identified since effective date of the permit (July 1, 2018): 2

Total number of illicit discharges removed since the effective date of the permit (July 1, 2018): 0

BMP 3C: Sanitary Sewer Overflows (SSOs)

This SSO section is NOT applicable because we DID NOT find any new SSOs.

Number of SSO's identified *during this reporting period*: 0

Number of SSO's removed *during this reporting period*: 0

BMP 3D: MS4 System Mapping

Updated system map due in Year 2 as necessary:

Provide additional status information regarding your map:

Updated map of storm sewer system and associated outfalls is in progress but has not been completed at this time under year 4. The Town did not hire staff/interns to conduct additional mapping during the reporting period of year 4. The Town's map of storm sewer system and associated outfalls is still progressing and being continually updated to reflect findings and changes.

BMP 3D: Screening of Outfalls/Interconnections

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

BMP 3E: Dry Weather Screening

Number of outfalls screened *during this reporting period*: 20

Percent of total known outfalls screened to date *during this reporting period*: 8 percent

The inventory and ranking of outfalls/interconnections was updated and the IDDE Program Plan will be revised as a result. The revised inventory and ranking of outfalls/interconnections can be found in the submission

BMP 3F: Wet Weather Screening / Catchment Investigations

- No outfalls were inspected for wet weather screening *during this report period*.
- No catchment investigations were conducted *during this report period*.

BMP 3G: Employee Training

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

Due to lack of staff and workload priorities, training was not performed. Training to be performed in Fall / Winter 2022

MCM 4: Construction Site Stormwater Runoff Control

Year 4 Activities

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

Number of site plan reviews completed *during this reporting period*: 42

Number of inspections completed *during this reporting period*: 269

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

Londonderry works closely with contractors to address environmental concerns for the least environmental impact. A preconstruction meeting is required for all approved Planning Board Projects

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

A written site inspection and enforcement program for erosion and sediment control measures will be developed.

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

Year 4 Activities

Ordinance or Regulatory Mechanism

- Londonderry has regulatory mechanism consistent with permit requirements 2.3.6.a.ii.
A Post-Construction Ordinance has not been drafted or adopted.

BMP 5A: As-built Drawings

Number of as-built drawings received *during this reporting period*: 8

BMP 5B: Retrofit Properties Inventory

- Identified permittee-owned properties that could potentially be modified or retrofitted with BMPs to reduce impervious cover

Londonderry has initially identified the following permittee-owned properties that could possibly be modified or retrofitted with BMPs to mitigate impervious areas. Further study is required for suitability.

Property addresses:

268 Mammoth Rd, 17 Sargent Rd, 94 West Rd, 102 West Rd, 17 Young Rd, 20 Grenier Field Rd

BMP 5C: Green Infrastructure Report

- Developed a report assessing local regulations to determine the feasibility of making green

infrastructure practices allowable when appropriate site conditions exist, made it available as part of the SWMP, and:

- No updates were recommended.

BMP 5D: Street Design and Parking Lot Guidance Report

- Developed a report assessing current street design and parking lot guidelines and other local requirements within the municipality that affect the creation of impervious cover, made it available as part of the SWMP, and:

- No updates were recommended.

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

- No updates were recommended.

- Updates were recommended. The anticipated date of completion for updates is in 2023

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

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. 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 in association with VHB developed a guidance document to standardize 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. The document was made available in January 2022 and is currently under review by Londonderry.

MCM 6: Good Housekeeping

Year 4 Activities

BMP 6A: Permittee Owned Facilities Inventory

All permittee owned facilities, including inventories, have been included with the appropriate BMPs and have been included in the 2022 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 for all permittee owned facilities have been completed and/or updated as noted below:
 - O&M programs and procedures for all permittee owned facilities have been completed during Year 3 and have been included in the 2022 SWMP update. All maintenance procedures will be implemented for permittee owned facilities in accordance with O&M programs.
- Updated inventory of all permittee owned facilities as necessary
 - All permittee owned facilities, including an inventory, are included in our SWMP. There were no changes to report during Year 4.

BMP 6E: Catch Basin Cleaning Program

- Properly 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:

Number of catch basins inspected **during this reporting period:** 1250

Number of catch basins cleaned **during this reporting period:** 1000

Total volume **or** mass of material removed from all catch basins **during this reporting period:** 150 CY

Total number of catch basins within the MS4 system: 2500

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.

BMP 6F: Street Sweeping Program

- Properly 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*: 0

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

BMP 6G: Stormwater Treatment Structures Inspection and Maintenance Procedures

- Inspected all permittee owned treatment structures (excluding catch basins) as outlined in the SWMP

An Inspection and Maintenance procedure document for the Stormwater Treatment Structures with an inventory listing has been developed and has been incorporated into the 2022 SWMP update. All maintenance procedures will be implemented for permittee owned facilities in accordance with O&M programs. During the reporting period, three detention basin facilities were maintained.

BMP 6H: Winter Road Maintenance Program

- Enclosed all road salt storage piles or facilities and implemented winter road maintenance procedures to minimize the use of road salt as outlined in the SWMP

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

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

https://www.londonderrynh.gov/sites/g/files/vyhlf4616/f/uploads/londonderry_srp_final_wit_h_appendices_07-16-10_-_updated_july_26_2022.pdf

BMP 6I: Stormwater Pollution Prevention Plan (SWPPP)

SWPPPs have been developed for the following facilities: DPW Maintenance Garage and Drop-Off Center where pollutants are exposed to stormwater and have been included in the 2022 SWMP

update.

- Implemented SWPPPs for all permittee owned or operated maintenance garages, public works yards, transfer stations, and other waste handling facilities

Number of site inspections completed for ***during this reporting period: 0***

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

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

No corrective actions necessary

Due to lack of staff and workload priorities, site inspections were not performed at the Drop-off center or DPW garage. Inspections to be performed in Fall / Winter 2022.

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

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

- The Town has conducted catch basin inspection and cleaning, as needed, at half 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 developed and is currently under review and intended to be implemented in year 5 (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).

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*

Chloride Impairment (Appendix H)

- Permittee does not have a chloride impairment
- Updated Salt Reduction Plan as necessary *during this reporting period* and can be found in the submission

Nitrogen Impairment (Appendix H)

- Permittee does not have a nitrogen impairment

Phosphorus Impairment (Appendix H)

- Permittee does not have a phosphorus impairment

Solids, Oil and Grease (Hydrocarbons), or Metals Impairment(s) (Appendix H)

- Permittee does not have a solids, oil and grease, or metals impairment(s)

Chloride TMDL (Appendix F)

- Permittee does not have a chloride TMDL
- Updated Chloride Reduction Plan as necessary *during this reporting period* and can be found in the submission

Lake and Pond Phosphorus TMDL (Appendix F)

- Permittee does not have a lake and pond phosphorus TMDL

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

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. Stormwater Pollution for Industrial Facilities

- BMP 1E was renamed from the NOI application to Stormwater Pollution for Industrial Facilities 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. 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. 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).

COVID-19 Impacts

If any of the above Year 4 requirements could not be completed **during this reporting period** due to the impacts of COVID-19, please identify the requirement(s) that could not be completed, any actions taken to attempt to complete the requirement, and reason the requirement could not be completed below:

The Town of Londonderry's Department of Public Works & Engineering has seen personnel changes (both office and field) partially due to Covid-19 over the last few years. These changes have caused a staff shortage and the need to prioritize workload which has affected the Town's schedule implementing our MS4 requirements. The Town intends to retain a third party consultant for assistance depending upon available funds.

Activities Planned for Next Reporting Period

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