

Year 5 Annual Report

New Hampshire Small MS4 General Permit

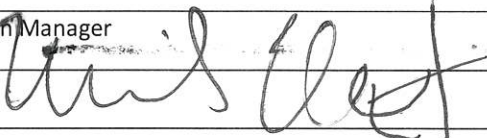
Reporting Period: July 1, 2022 - June 30, 2023

LONDONDERRY, NH

EPA NPDES Permit Number NHR041016

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: Michael Malaguti	
Title: Town Manager	
Signature: 	Date: 9/27/2023

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: John R. Trottier, PE	Title/Position: Director of Engineering & Environmental Services	
Department: Engineering & Environmental Services		
Street Address: 268B Mammoth Road		
City: Londonderry	State: New Hampshire	Zip Code: 03053
Email: jrtrottier@londonderrynh.org	Phone Number: 603-432-1100 x-146	

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 Londonderry 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.londonderrynh.org/sites/g/files/vyhlf4616/f/uploads/swmp.pdf
Date SWMP was Last Updated: A draft revision of August 2022 is currently under review.
IDDE Program Plan: Located within SWMP above as Appendix E
Updated System Map: See attached updated plan showing outfalls
Progress on Completion of System Map: See attached updated plan showing outfalls
Updated SSO Inventory: No SSO's have occurred
Updated Inventory and Ranking of Outfalls/Interconnections: An updated inventory and ranking has not been completed at this time
Dry Weather Screening Data: See attached
Wet Weather Screening Data: None conducted during reporting period
Catchment Investigation Data: 2 catchment investigations were conducted during reporting period
Illicit Discharge Removal Report: See attached for 2 illicit discharge locations which were removed during reporting period
Results from additional stormwater or receiving water quality monitoring reports or studies: None conducted during reporting period

Appendix H: Salt Reduction Plan: See attached "Londonderry_spr_final_with_appendices_07-16-10_-_updated_july_26_2022" submission

Annual Salt Usage Report See attached

Updated Nitrogen Source Identification Report: Not Applicable

Updated Phosphorus Source Identification Report: Not Applicable

Street Sweeping Schedule: None

Appendix F: Chloride Reduction Plan: Londonderry_spr_final_with_appendices_07-16-10_-
_updated_july_26_2022" submission

Annual Salt Usage Report See attached

Lake Phosphorus Control Plan: Not Applicable

Lake Phosphorus Control Plan (Items 1-4): Not Applicable

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 type="checkbox"/> Bacteria/Pathogens	<input checked="" type="checkbox"/> Chloride	<input type="checkbox"/> Nitrogen
<input type="checkbox"/> Phosphorus	<input checked="" 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?

Yes

Londonderry 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:

TMDL:

No

Londonderry 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:

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

The dry weather sampling conducted during this reporting year resulted in a reduction of the number of outfalls initially reported in the NOI from 489 to 330.

Minimum Control Measures

MCM 1: Public Education

Total number of all MS4 related educational efforts completed *during this reporting period*: 43

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

No

BMP 1A: Pet Waste Disposal

Outreach Resources:

Pet waste related flyers, mailers, postcards, and videos found on the [MCM #1 webpage](#) of the NH MS4 website.

"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 5 = 17

Goal was achieved.

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

BMP 1B : Grass and Fertilizer

Outreach Resources:

Grass and fertilizer related flyers, mailers, postcards, videos, and social media posts found on the [MCM #1 webpage](#) of the NH MS4 website.

“Green Grass & Clear Water Brochure” and “Stormwater Pollution Education: Fertilizing the Lawn” and Lawn Care within the Protected Shoreland (July 2022) 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 5 = 6

Goal was achieved.

Message Date: July 2022 (latest) and June 20, 2019 and ongoing.

BMP 1C: Septic System Maintenance

Outreach Resources:

Septic system related brochures, letters, videos **and/or** social media posts found on the [MCM #1 webpage](#) of the NH MS4 website.

“ Do your Part – Be Septic Smart” Flyer:

https://www.londonderrynh.org/sites/g/files/vyhlif4616/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 5 = 9

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:

Leaf and grass clippings related flyers, brochures, pledges, door hangers, and videos found on the [MCM #1 webpage](#) of the NH MS4 website.

“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, which were distributed ***during this reporting period:***

Year 5 = 11

Goal was achieved.

Message Date: October 2022 (Latest) and November 5, 2019, BMPs placed on website and ongoing.

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

Outreach Resources:

Industrial facilities related letter and fact sheets found on the [MCM #1 webpage](#) of the NH MS4 website.

“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 5 = 0

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

https://www.londonderrynh.gov/sites/g/files/vyhlif4616/f/imce/u196/storm_water_construction_poster_-_londonderry_-_posted_sept_2022_0.jpg

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 5 = 0

Londonderry held 3 pre-construction meetings, representing 16% 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

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 5 = 0

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:

Public involvement or participation opportunities are ancillary to daily operations.

MCM 2: Public Participation

BMP 2A: Public Review of Stormwater Management Plan

Description:

The Stormwater Management Program (SWMP) was updated in September 2022 (Draft document under review) 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>

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

No

Yes. Londonderry made the following changes:

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 12, 2022, and May 20, 2023

Conducted Used Oil Collections on: 7/1/22, 8/6/22, 9/3/22, 10/1/22, 11/5/22, 12/3/22, 4/1/23, 5/6/23, 6/3/23.

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

Virtual Partnership with the City of Manchester occurred during the report period. Partnership with the Manchester Airport has not begun.

Recent coordination with the Manchester Airport has occurred in year 5 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 6) 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 2023" roadside cleanup program occurred on April 22, April 29, and May 6, 2023.

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

Public involvement or participation opportunities are ancillary to daily operations.
--

MCM 3: Illicit Discharge Detection and Elimination (IDDE)

BMP 3B: IDDE Progress

- No illicit discharges were found *during this reporting period*.
- Illicit discharges were found but not removed *during this reporting period*. Additional upstream dry weather catchment investigations are scheduled for Year 6.
- Illicit discharges were removed *during this reporting period* and the illicit discharges removal report is attached to this submission.

Number of illicit discharges identified *during this reporting period*: 5.

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

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

Total number of illicit discharges identified *since the effective date of the permit (July 1, 2018 – June 30, 2023)*: 7.

Total number of illicit discharges removed *since the effective date of the permit (July 1, 2018 – June 30, 2023)*: 2.

BMP 3C: Sanitary Sewer Overflows (SSOs)

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

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

Number of SSOs identified *during this reporting period*: 0.

Number of SSOs 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 5. The Town did not hire staff/interns to conduct additional mapping during the reporting period of year 5. 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

- 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 the submission.

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

Number of outfalls/interconnections screened *during this reporting period*: 310.

Percent of total known outfalls/interconnections screened *to date (Year 1 – Year 5)*: 98%

The inventory and ranking of outfalls/interconnections was not updated during Year 5 because the sampling results of all of the flowing outfalls/interconnections was not available during the reporting period.

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 the submission.

Number of catchment investigations *during this reporting period*: 2.

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)*: 1%

BMP 3F: 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.

Number of outfalls screened *during this reporting period*:

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

BMP 3G: Employee Training

Provided training to employees involved in IDDE program *during the reporting period*: None.

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

Due to lack of staff and workload priorities, training was not performed. Training to be performed in Fall / Winter 2023

The two locations where illicit discharges were discovered in year 3 dry weather sampling were investigated in year 5 with the results indicating no illicit discharges occurring at the outfalls or at the upstream structures. The two locations found in year 3 no longer have illicit discharges based upon sampling conducted in year 5. See attachment to this submission

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*: 60.

Number of inspections completed *during this reporting period*: 221.

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

Londonderry works closely with contractors to address environmental concerns and to target the least environmental impact.

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

Ordinance or Regulatory Mechanism

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

BMP 5A: As-built Drawings

Number of as-built drawings received *during this reporting period*: 9

BMP 5B: Retrofit Properties Inventory

- Identified permittee-owned properties that could potentially be modified or retrofitted with BMPs to reduce impervious cover in **Year 4**. Further study is required for determination of suitability. Property addresses: 268 Mammoth Rd, 17 Sargent Rd, 94 West Rd, 102 West Rd, 17 Young Rd, 20 Grenier Field Rd
- Londonderry has not identified the remaining permittee-owned properties that could be modified or retrofitted with BMPs to mitigate impervious areas.
List of MS4 Properties: 0
List of Non-MS4 Properties: 0
- Londonderry has modified or retrofitted the following properties 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: 0
List of Non-MS4 Properties: 0

BMP 5C: Green Infrastructure Reports

- During Year 4**, Londonderry developed a report assessing local regulations to determine the feasibility of making green infrastructure practices allowable when appropriate site conditions exist. The report will be included as part of the next SWMP update.
- No progress was made *during this reporting period* towards making green infrastructure practices allowable as outlined in the Local Regulations Assessment Report.

BMP 5D: Street Design and Parking Lots Report

- During Year 4**, Londonderry 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. The report will be included as part of the next SWMP update.
- No changes were made or planned to be made to local regulations and/or guidelines **during this reporting period**.

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 was by the end of 2023. However, the Town experienced staffing loss and changes at the end of 2022 and through 2023. New staff will need to become familiar with the regulations and updates intended to be completed by the Town in the near future.

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.

The Town adopted a Stormwater Ordinance in September 2019. The Town is still progressing to incorporate the Ordinance into updated Site and Subdivision regulations. Recent staffing changes have delayed progress.

MCM 6: Good Housekeeping

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 5.

BMP 6E: 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:

No actions were taken because no catch basin sumps were 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.

Number of catch basins inspected ***during this reporting period***: 2,500+/-

Number of catch basins cleaned ***during this reporting period***: 2,000+/-

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

600 CY+/-

Total number of catch basins within the MS4 system: 2,500+/-

BMP 6F: 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:** 0.
Volume of swept material **during this reporting period:** 0
Mass of swept material **during this reporting period:** 0

BMP 6G: 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.
Number of site inspections/maintenance completed **during this reporting period:** 0
- Due to lack of staff and workload priorities, site inspections of the Town owner facilities were not performed.

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_with_appendices_07-16-10_-_updated_july_26_2022.pdf

BMP 6I: 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, which are not currently covered under another NPDES Permit.

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.

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 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 now in year 6 (BMP 6E).
- The development of a street sweeping program did not occur during the reporting period and was delayed. The Town 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*.

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

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 the attached submission.

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 submitted it to NHDES. A copy can be found in the attachments to this 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:

None

Nitrogen Impairment (Appendix H)

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

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

Not Applicable

Phosphorus Impairment (Appendix H)

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

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

Not Applicable

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**. Londonderry street sweeping schedule can be found.

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

The development of a street sweeping program did not occur during the reporting period and was delayed. The Town 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).

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 the submission.

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, submitted it to NHDES. A copy can be found in the attachments of this 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:

NONE

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.
- The results from additional reports or studies are
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:

None

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.

- 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).

Activities Planned for Next Reporting Period

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

Attachments to this submission:

- Londonderry Outfall Key Map
- Londonderry Annual Salt Usage Report
- Londonderry Outfall Data spreadsheet
- Illicit Discharge memo to J. Trottier 6-30-23
- Year 5 Londonderry SW WQ Sampling Results
- Londonderry Salt Reduction Plan - Revision 2 - July 26, 2022