

# **Year 6 Annual Report**

**New Hampshire Small MS4 General Permit**

**Reporting Period: July 1, 2023 - June 30, 2024**

**Londonderry**

EPA NPDES Permit Number NHR041016

# Certification of Small MS4 Year 6 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:	

**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.gov	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, 2023, through June 30, 2024**, in accordance with the Permit.

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

<a href="https://www.epa.gov/npdes-permits/regulated-ms4-new-hampshire-communities">https://www.epa.gov/npdes-permits/regulated-ms4-new-hampshire-communities</a>
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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 6 information can be found in submission or at the following websites, and will be referred to throughout this report:

SWMP: <a href="https://www.londonderrynh.org/sites/g/files/vyhlif4616/f/uploads/swmp.pdf">https://www.londonderrynh.org/sites/g/files/vyhlif4616/f/uploads/swmp.pdf</a>
Date SWMP was Last Updated: A draft revision of August 2022 is current 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: 5 catchment investigations were conducted during reporting period
System Vulnerability Factors: See attached submission.
Illicit Discharge Removal Report: See attached for 5 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
PTAP 2024 Nutrient Reduction Report: N/A

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 submission
Updated Nitrogen Source Identification Report: Not Applicable
PTAP 2024 Nutrient Reduction Report: N/A

Londonderry Nutrient Tracking Program Report:N/A
Updated Phosphorus Source Identification Report: Not Applicable
PTAP 2024 Nutrient Reduction Report: N/A
Londonderry Nutrient Tracking Program Report: N/A

Street Sweeping Schedule: None – See BMP 6F
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Appendix F: Chloride Reduction Plan: Londonderry_spr_final_with_appendices_07-16-10_- _updated_july_26_2022” submission
Annual Salt Usage Report: See attached submission

Lake Phosphorus Control Plan: Not Applicable
Lake Phosphorus Control Plan (Items 1-4): Not Applicable
PTAP 2024 Nutrient Reduction Report: N/A
Londonderry Nutrient Tracking Program Report: N/A

# 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 6 reporting period and can be found on the [New Hampshire Department of Environmental Services \(NHDES\) 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 there been any changes to your lists of **receiving waters or impairments** since the NOI was submitted?

Yes

Changes have been made to the lists of receiving waters or impairments since the NOI submission. The following **impairments and/or TMDLs** have been added or delisted:

Water Quality Impaired Waters: See Below

TMDL:

No

There have been no changes to the lists of **receiving waters or impairments** since the NOI submission.

Have there been any changes to your **list of outfalls** since the NOI was submitted?

Yes

Changes have been made to the **list of outfalls** since the NOI submission.

A total of 0 outfall(s) have added.

A total of 59 outfall(s) have removed.

No

Londonderry has not made changes to the **list of outfalls** 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 Solids/Oil/Grease have been removed from Little Cohas Brook NHRIV700060703-05.

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

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

# Minimum Control Measures

## MCM 1: Public Education

Total number of all MS4 related educational efforts completed *during this reporting period*: 86

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/vyhlf4616/f/imce/u196/please\\_scoop\\_the\\_poop\\_sept.16.2021.jpg](https://www.londonderrynh.org/sites/g/files/vyhlf4616/f/imce/u196/please_scoop_the_poop_sept.16.2021.jpg)

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

[https://www.londonderrynh.gov/sites/g/files/vyhlf4616/f/uploads/make\\_sure\\_you\\_pick\\_up\\_after\\_your\\_pet.pdf](https://www.londonderrynh.gov/sites/g/files/vyhlf4616/f/uploads/make_sure_you_pick_up_after_your_pet.pdf)

#### 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 residents that pledged through the PREP "Every Drop" website *during this reporting period*:

Year 6 = 26

**Goal was achieved.**

**Message Date:** April 17, 2024 (latest), previously September 16, 2021), & 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):**

Residents that are lawn care enthusiasts understand the potential water quality impacts from fertilizer and improper disposal of grass clippings and are aware of the proper lawn care management techniques for reducing those impacts. Measurement includes quantity of materials distributed.

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

Year 6 = 15

**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/vyhlf4616/f/uploads/do\\_your\\_part\\_-\\_be\\_septic\\_smart\\_-\\_sept\\_2021](https://www.londonderrynh.org/sites/g/files/vyhlf4616/f/uploads/do_your_part_-_be_septic_smart_-_sept_2021)

<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 are the number of flyers, brochures, and letters that were distributed **during this reporting period:**

Year 6 =	7 - “ Get Pumped NH” brochures
	26 – “Get Pumped” magnets
	4 – “What’s flushable“ brochures

### Goal was achieved.

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

## **BMP1D: 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 **and/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 are the number of flyers that were distributed **during this reporting period:**

Year 6 = 18

### **Goal was achieved.**

**Message Date:** Fall - 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/vyhlf4616/f/imce/u196/stormwater\\_pollution\\_control\\_for\\_industrial\\_facilities\\_-\\_sept\\_2021\\_0.jpg](https://www.londonderrynh.org/sites/g/files/vyhlf4616/f/imce/u196/stormwater_pollution_control_for_industrial_facilities_-_sept_2021_0.jpg)

[https://www.londonderrynh.gov/sites/g/files/vyhlf4616/f/uploads/ms4-2022-industrial-fact-sheet-template\\_1.pdf](https://www.londonderrynh.gov/sites/g/files/vyhlf4616/f/uploads/ms4-2022-industrial-fact-sheet-template_1.pdf).

**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 6 = 6

**Goal was achieved.**

**Message Date:** October 2023 (latest) and Sept 20, 2021 and ongoing

**BMP 1F: Construction/Developers Outreach**

**Outreach Resources:**

<https://www.nhms4.des.nh.gov/>

[https://www.londonderrynh.gov/sites/g/files/vyhlf4616/f/imce/u196/storm\\_water\\_construction\\_poster - londonderry - posted sept 2022 0.jpg](https://www.londonderrynh.gov/sites/g/files/vyhlf4616/f/imce/u196/storm_water_construction_poster_-_londonderry_-_posted_sept_2022_0.jpg)

[https://www.londonderrynh.gov/sites/g/files/vyhlf4616/f/uploads/what\\_you\\_can\\_do\\_as\\_a\\_developer - oct 2023 0.pdf](https://www.londonderrynh.gov/sites/g/files/vyhlf4616/f/uploads/what_you_can_do_as_a_developer_-_oct_2023_0.pdf)

**Description:**

Provide the Construction General Permit (CGP) outreach letter and fact sheets to developers, construction contractors, and other municipal or local organizations to educate them on the

EPA 2022 Construction General Permit along with information on the selection, installation, and maintenance of construction related best management practices.

**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 EPA 2022 Construction General Permit and its associated requirements including that those who wish to be considered a qualified person to conduct inspections must meet EPA training standards. Contractors, developers, and municipal or local organizations are also educated on how to properly select, install, and maintain construction related best management practices.

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

Year 6 = 8

The Town of Londonderry held 12 pre-construction meetings, representing ~ 52% of projects that received planning board approval and began construction *during this reporting period*.

**Goal was achieved.**

**Message Date:** October 2023 (latest) and 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/vyhlf4616/f/uploads/stormwater\\_business\\_-\\_sept\\_17\\_2021\\_0.pdf](https://www.londonderrynh.org/sites/g/files/vyhlf4616/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 6 = 6

**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 18, 2023, and June 8, 2024

Conducted Used Oil Collections on: 8/5/23, 9/2/23, 10/7/23, 11/4/23, 11/18/23, 12/2/23, 2/3/24, 3/2/24, 4/6/24, 5/4/24, 6/1/24.

## **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. Continuation is anticipated to occur in the following year (year 7) 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 2024 ” roadside cleanup program occurred on May 4, 2024.

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*.
- Illicit discharges were removed *during this reporting period* and the illicit discharges removal report can be found attached to this submission.

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

Number of illicit discharges removed *during this reporting period*: 5

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, 2024)*: 7

Total number of illicit discharges removed *since the effective date of the permit (July 1, 2018 – June 30, 2024)*: 7

## BMP 3C: Sanitary Sewer Overflows (SSOs)

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

*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 **Phase 1** 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 6. The Town did not hire staff/interns to conduct additional mapping during the reporting period of year 6. The Town's map of storm sewer system and

associated outfalls is still progressing and being continually updated to reflect findings and changes.

- Updated **Phase 2** system map (due in Year 10):

Percent of Phase 2 map completed: 0% as of June 30, 2024.

Provide additional status information regarding your map:

Map of storm sewer system, catchments, and related elements is continually updated to incorporate findings and changes from catchment investigations.

### **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 submission.

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

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

Percent of total known outfalls/interconnections screened *to date (Year 1 – Year 6)*: 100%

The inventory and ranking of outfalls/interconnections was not updated during Year 6 because the Town is currently determining the updated number of outfalls based upon the latest ruling for “Waters of the United States”.

### **BMP Catchment Investigations**

- No catchment investigations were conducted *during this report period*. Catchment investigations include investigations associated with Problem, High Priority, and Low Priority Outfalls/Interconnections within the MS4 regulated area.
- Catchment investigations were conducted, and data can be found in submission.

**Number** of catchment investigations *during this reporting period*: 5.

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 6)*: 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 in submission **and/or** at the following website.

Number of outfalls screened *during this reporting period*: 0

Percent of total known outfalls/interconnections screened *to date (Year 1 – Year 6)*: 0

### BMP 3G: Employee Training

- Provided training to employees involved in IDDE program *during this reporting period*: NO Londonderry staff were trained using IDDE training videos or written IDDE SOP.

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 2024.

The five locations where illicit discharges were discovered in year 4 dry weather sampling were investigated in year 6 with the results indicating no illicit discharges occurring at the outfalls or at the upstream structures. The five locations no longer have illicit discharges based upon sampling conducted in year 6. 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*: 66

Number of inspections completed *during this reporting period*: 407

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

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

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

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.  
Date regulatory mechanism(s) was adopted: September 16, 2019 and amended June 17, 2024. The regulatory document can be found at:  
[https://www.londonderrynh.gov/sites/g/files/vyhlf4616/f/uploads/stormwaterordinance\\_-\\_londonderry\\_-\\_final\\_adopted\\_-\\_june\\_17\\_2024\\_0.pdf](https://www.londonderrynh.gov/sites/g/files/vyhlf4616/f/uploads/stormwaterordinance_-_londonderry_-_final_adopted_-_june_17_2024_0.pdf)
- Londonderry has not drafted or adopted a regulatory mechanism(s) consistent with permit requirements.

## BMP 5A: As-built Drawings

Number of as-built drawings received *during this reporting period*: 4

## BMP 5B: Retrofit Properties Inventory

- Londonderry has identified permittee-owned MS4 properties that could potentially be modified or retrofitted with BMPs to reduce impervious cover. 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 non-MS4 permittee-owned properties that could be modified or retrofitted with BMPs to mitigate impervious areas.
- Londonderry has modified or retrofitted the following MS4 properties with BMPs to mitigate impervious area that were inventoried as part of 2.3.6.e of the permit. Following is a list of the properties that were modified or retrofitted:  
List of MS4 Properties: 0  
List of Non-MS4 Properties: 0

## BMP 5C: Green Infrastructure Reports

- The **Assessment Report** was evaluated and no updates were recommended *during this reporting period*.
- Updates were made to the **Local Regulations** *during this reporting period*. Londonderry has made progress on Infiltration Practices. Progress includes updating the ordinance.

## **BMP 5D: Street Design and Parking Lots Report**

- The **Assessment Report** was evaluated and no updates were recommended *during this reporting period*.
- No updates 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 and completed by June 30, 2024.

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 amended the Stormwater Ordinance and Stormwater Regulations on June 17, 2024. The Town is still progressing to incorporate the Ordinance and Regulations 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, 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 6.

## **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:** 500 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.

All curbed roadways were **not** swept at least once **during this reporting period**. The development of a street sweeping program did not occur during the reporting period. In March 2024, the Town of Londonderry established and funded the Municipal Separate Storm Sewer System (MS4) expendable trust fund per RSA 31:19-a, to assist in funding the Town's obligations, as mandated by the Clean Water Act and other laws and / or regulations to develop and maintain a comprehensive stormwater management program.

With the establishment of the MS4 expendable trust fund, the Town of Londonderry will be preparing bid documents for street sweeping services in the Fall / Winter 2024 and commence a street sweeping program in the Spring 2025.

In anticipation of upcoming street sweeping activities and for budgeting purposes, an inventory of the Town of Londonderry streets has begun.

All curbed roadways were swept at least once **during this 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 6.

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

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, 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](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)**

Londonderry has implemented SWPPPs for all permittee owned or operated maintenance garages, public works yards, transfer stations, and other waste handling facilities that are not currently covered under another NPDES Permit.

Number of site inspections completed for *during this reporting period*: 2

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.

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 7 (BMP 6E).
- The development of a street sweeping program did not occur during the reporting period.

In March 2024, the Town of Londonderry established and funded the Municipal Separate Storm Sewer System (MS4) expendable trust fund per RSA 31:19-a, to assist in funding the Town's obligations, as mandated by the Clean Water Act and other laws and / or regulations to develop and maintain a comprehensive stormwater management program.

With the establishment of the MS4 expendable trust fund, the Town of Londonderry will be preparing bid documents for street sweeping services in the Fall / Winter 2024 and commence a street sweeping program in the Spring 2025. (BMP 6F)

In anticipation of upcoming street sweeping activities and for budgeting purposes, an inventory of the Town of Londonderry streets has begun.

## Appendix F and H: Water Quality Limited Waters & TMDLs

### Bacteria/Pathogens Impairment (Appendix H) AND TMDL (Appendix F)

- Annual message was distributed encouraging the proper management of pet waste, including noting any existing ordinances where appropriate *during this reporting period.*
- Permittee or its agent(s) disseminated educational material to dog owners at the time of issuance or renewal of dog license, or other appropriate time *during this reporting period.*
- Provided information to owners of septic systems about proper maintenance in any catchment that discharges to a water body impaired for bacteria *during this reporting period.*

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

Not Applicable

### Chloride Impairment (Appendix H)

- Permittee **does not** have a chloride impairment.
- Permittee **has** a chloride impairment.
  - Fully implemented Salt Reduction Plan which can be found in submission.

The Municipal Green SnowPro Certification Program’s (Program) rules and regulations were approved and adopted in 2024. The Program anticipates they will be ready to accept voluntary applications from municipalities in fall of 2024.

- Reported amount of salt applied to all municipally-owned and maintained surfaces by completing the New Hampshire DES Annual Salt Usage reporting form and submitting it to NHDES, and can be found in 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:

Not Applicable

## 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 in submission.

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 which can be found in the submission.

The Municipal Green SnowPro Certification Program’s (Program) rules and regulations were approved and adopted in 2024. The Program anticipates they will be ready to accept voluntary applications from municipalities in fall of 2024.

- Reported amount of salt applied to all municipally-owned and maintained surfaces by completing the New Hampshire DES Annual Salt Usage reporting form, submitting it to NHDES, and can be found attached 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:

Not Applicable

## Lake and Pond Phosphorus TMDL (Appendix F)

- Permittee **does not** have a lake and pond phosphorus TMDL.

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

Not Applicable

# 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 amended Stormwater Ordinance into the regulations (MCM 4).
- The stormwater ordinance and regulations have been updated relative to the post development requirements stormwater facilities outline in the permit and were amended on June 17, 2024 under BMP 5A during this reporting period. At this time, the Town is in the process of updating the site and subdivision regulations to reflect the recently amended stormwater ordinance and regulations and incorporate the checklist and recently amended 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
- System Vulnerability Spreadsheets
- Illicit Discharge memo to J. Trottier 6-28-24
- Londonderry Annual Salt Usage Report
- Londonderry Salt Reduction Plan - Revision 2 - July 26, 2022
- Amended Stormwater Regulations
- Amended Stormwater Ordinance