

Year 5 Annual Report
New Hampshire Small MS4 General Permit
Reporting Period: July 1, 2022-June 30, 2023

Please DO NOT attach any documents to this form. Instead, attach all requested documents to an email when submitting the form. Also ensure any websites included on this form are to publicly accessible sites

Unless otherwise noted, all fields are required to be filled out. If a field is left blank, it will be assumed the requirement or task has not been completed. Please ONLY report on activities between July 1, 2022 and June 30, 2023 unless otherwise requested.

Part I: Contact Information

Name of Municipality or Organization: Windham, NH

EPA NPDES Permit Number: NHR041035

Primary MS4 Program Manager Contact Information

Name: Brian McCarthy

Title: Town Administrator

Street Address Line 1: 4 North Lowell Road

Street Address Line 2:

City: Windham

State: NH

Zip Code: 03087

Email: bmccarthy@windhamnh.gov

Phone Number: (603) 432-7732

Stormwater Management Program (SWMP) Information

SWMP Location (publicly available web address): <https://windhamnh.gov/DocumentCenter/View/12909/SWMP-2022?bidId=>

Date SWMP was Last Updated: Sep 1, 2022

If the SWMP is not available on the web please provide the physical address:

Part II: Self-Assessment

First, in the box below, select the impairment(s) and/or TMDL(s) that are applicable to your MS4. Make sure you are referring to the most recent EPA approved Section 303(d) Impaired Waters List which can be found here: <https://www.epa.gov/tmdl/region-1-impaired-waters-and-303d-lists-state>

Impairment(s)			
☒ Bacteria/Pathogens	☒ Chloride	☐ Nitrogen	☒ Phosphorus
☒ Solids/ Oil/ Grease (Hydrocarbons)/ Metals			
TMDL(s)			
☒ Bacteria and Pathogen	☒ Chloride	☐ Lake and Pond Phosphorus	
Clear Impairments and TMDLs			

Next, check off all requirements below that have been completed. By checking each box you are certifying that you have completed that permit requirement fully. If you have not completed a requirement leave the box unchecked. Additional information will be requested in later sections.

Annual Requirements

- ☒ Provided an opportunity for public participation in review and implementation of SWMP and complied with State Public Notice requirements
- ☒ Kept records relating to the permit available for 5 years and made available to the public
- ☐ The SSO inventory has been updated, including the status of mitigation and corrective measures implemented
 - ☒ This is not applicable because we do not have sanitary sewer
 - ☐ This is not applicable because we did not find any new SSOs
 - ☐ The updated SSO inventory is attached to the email submission
 - ☐ The updated SSO inventory can be found at the following publicly available website:
- ☒ Updated system map due in year 2 as necessary
- ☒ Provided training to employees involved in IDDE program within the reporting period
- ☒ Properly stored and disposed of catch basin cleanings and street sweepings so they did not discharge to receiving waters
- ☒ All curbed roadways were swept at least once within the reporting period
- ☒ Implemented SWPPPs for all permittee owned or operated maintenance garages, public works yards, transfer stations, and other waste handling facilities
- ☒ Enclosed all road salt storage piles or facilities and implemented winter road maintenance procedures to minimize the use of road salt
- ☒ Updated inventory of all permittee owned facilities as necessary
- ☒ O&M programs for all permittee owned facilities have been completed and updated as necessary

- ☒ Implemented all maintenance procedures for permittee owned facilities in accordance with O&M programs
- ☒ Implemented program for MS4 infrastructure maintenance to reduce the discharge of pollutants
- ☒ Inspected all permittee owned treatment structures (excluding catch basins)

Optional: If you would like to describe progress made on any incomplete requirements listed above or provide any additional details, please use the box below:

Bacteria/ Pathogens (Combination of Impaired Waters Requirements and TMDL Requirements as Applicable)

Annual Requirements

*Public Education and Outreach**

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

** Public education messages can be combined with other public education requirements as applicable (see Appendix H and F for more information)*

Optional: If you would like to describe progress made on any incomplete requirements listed above or provide any additional details, please use the box below:

At the March 2023 Annual Town Election, the Town voted to adopt an ordinance governing septic system pump-out and inspections within the Cobbetts Pond Village District (CPVD). Cobbett's Pond is an impaired water body and protecting its water quality is a major goal for the Town.

Chloride Impairment

- ☒ Implemented the Salt Reduction Plan
- ☒ Reported amount of salt applied to all municipally owned and maintained surfaces using the UNH Technology Transfer Center online tool

Optional: If you would like to describe progress made on any incomplete requirements listed above or provide any additional details, please use the box below:

Phosphorus Impairment

Annual Requirements*Public Education and Outreach**

- ☒ Distributed an annual message in the spring (April/May) encouraging the proper use and disposal of grass clippings and encouraging the proper use of slow-release and phosphorus-free fertilizers
- ☒ Distributed an annual message in the summer (June/July) encouraging the proper management of pet waste, including noting any existing ordinances where appropriate
- ☒ Distributed an annual message in the fall (August/September/October) encouraging the proper disposal of leaf litter

** Public education messages can be combined with other public education requirements as applicable (see Appendix H and F for more information)*

Good Housekeeping and Pollution Prevention for Permittee Owned Operations

- ☒ Increased street sweeping frequency of all municipal owned streets and parking lots subject to Permit part 2.3.7.a.iii.(c) to a minimum of two times per year (spring and fall)

Structural BMPs

- Completed the evaluation of all permittee owned properties identified as presenting retrofit opportunities or areas for structural BMP installation under permit part 2.3.6.d or identified in the Phosphorus Source Identification Report, including: *(select the items of the evaluation that have been completed below)*
- ☒ Next planned infrastructure, resurfacing, or redevelopment activity planned for the property (if applicable) OR planned retrofit date
 - ☒ Estimated cost of redevelopment or retrofit BMPs
 - ☐ Engineering and regulatory feasibility of redevelopment or retrofit BMPs
 - ☒ Completed a listing of planned structural BMPs and a plan and schedule for implementation
 - ☐ The BMP list and implementation schedule is attached to the email submission
 - ☒ The BMP list and implementation schedule can be found at the following publicly available website:

<https://www.windhamnh.gov/DocumentCenter/View/12905>

- Any structural BMPs already existing or installed in the regulated area by the permittee or its agents was tracked and the phosphorus removal by the BMP was estimated consistent with Attachment 3 to Appendix F. The BMP type, total area treated by the BMP, the design storage volume of the BMP and the estimated phosphorus removed in mass per year by the BMP were documented.
- ☐
 - ☒ No BMPs were installed
 - ☐ The BMP information is attached to the email submission
 - ☐ The BMP information can be found at the following website:

Total estimated phosphorus removed in lbs/year from the installed BMPs: 0

Optional: If you would like to describe progress made on any incomplete requirements listed above or provide any additional details, please use the box below:

In April 2023, the Town received an estimate regarding the drainage work to be done at 11 Cobbetts Pond Rd

(Cemetery on the Plains - 21-W-6) and intends on carrying out the work in the next reporting year. The estimate references the following work: adding two drain inlets and two yard drain inlets in which the nearby area will be landscaped to drain toward, general maintenance on currently existing drainage structures, adding loam to edges of pavement, removing pavement, and regrading the roadway to redirect runoff. This will improve water quality by minimizing impervious area and facilitating better absorption of stormwater into the ground.

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

Annual Requirements

Good Housekeeping and Pollution Prevention for Permittee Owned Operations

- ☐ Increased street sweeping frequency of all municipal owned streets and parking lots to a schedule that targets areas with potential for high pollutant loads
- ☐ The street sweeping schedule is attached to the email submission
- ☐ The street sweeping schedule can be found at the following publicly available website:

Optional: If you would like to describe progress made on any incomplete requirements listed above or provide any additional details, please use the box below:

No areas have been identified with high pollutant loads.

Chloride TMDL

Annual Requirements

- ☒ Implemented Chloride Reduction Plan or Alternative Chloride Reduction Plan
- ☒ Reported amount of salt applied to all municipally owned and maintained surfaces using the UNH Technology Transfer Center online tool

Optional: If you would like to describe progress made on any incomplete requirements listed above or provide any additional details, please use the box below:

Optional: Use the box below to provide any additional information you would like to share as part of your self-assessment:

In November 2022, the Town of Windham purchased an excavator for general swale and outfall maintenance as well as miscellaneous construction activities. Additionally, the Town of Windham participated in six Hazardous Waste Collection events where residents can dispose of household wastes in adjacent towns. The town also holds an annual electronic waste collection day in partnership with the Windham PTA.

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Part III: 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

☒ No

If yes, describe below, including any relevant impairments or TMDLs:

Part IV: Minimum Control Measures

Please fill out all of the metrics below. If applicable, include in the description who completed the task if completed by a third party.

MCM1: Public Education

Number of educational messages completed during this reporting period: 4

Below, report on the educational messages completed during this reporting period. For the measurable goal(s) please describe the method/measures used to assess the overall effectiveness of the educational program.

BMP: Pick Up After Your Pet

Message Description and Distribution Method:

PICK UP AFTER OUR PET - Pet Waste Pamphlet - It was handed out at the Transfer Station, posted on the Stormwater page of the Town website.

The brochure can be viewed on the Town website at:

<https://windhamnh.gov/DocumentCenter/View/7129/Pet-Waste-Disposal-Brochure>

Targeted Audience: Residents

Responsible Department/Parties: DPW Operations

Measurable Goal(s):

Handled out approximately 250 pamphlets at the Town Transfer Station to residents. It was also posted on the Town website.

Message Date(s): June 24, 2023

Message Completed for: Appendix F Requirements ☒ Appendix H Requirements ☒

Was this message different than what was proposed in your NOI? Yes ☐ No ☒

If yes, describe why the change was made:

BMP: Yard Waste

Message Description and Distribution Method:

YARD WASTE: A simple guide to the proper care and handling on leaves and yard waste. It was handed out at the Transfer Station and posted on the Stormwater page of the Town website.

This brochure can be viewed on the Town website at:

<https://www.windhamnh.gov/DocumentCenter/View/7096/Yard-Waste-Brochure?bidId=>

Targeted Audience: Residents

Responsible Department/Parties: DPW Operations

Measurable Goal(s):

Handled out approximately 250 pamphlets at the Town Transfer Station to residents. It was also posted on the Town website.

Message Date(s): June 24, 2023

Message Completed for: Appendix F Requirements ☒ Appendix H Requirements ☒

Was this message different than what was proposed in your NOI? Yes ☐ No ☒

If yes, describe why the change was made:

BMP: STORMWATER POLLUTION CONTROL FOR INDUSTRIAL FACILITIES

Message Description and Distribution Method:

Stormwater Pollution Control for Industrial Facilities Fact Sheet- a fact sheet informing industrial facilities of the importance of keeping pollutants out of the drainage system and notifying the concerned party of potential EPA requirements that may apply to them. Recommendations on how to minimize pollutants are included on the handout.

This fact sheet as well as an explanatory letter was mailed to 19 industrial properties within the town of Windham.

Targeted Audience: Industrial Facilities

Responsible Department/Parties: Community Development Department

Measurable Goal(s):

Mailed out a letter and fact sheet to 19 industrial facilities within the town.

Message Date(s): May 30, 2023

Message Completed for: Appendix F Requirements ☒ Appendix H Requirements ☒

Was this message different than what was proposed in your NOI? Yes ☐ No ☒

If yes, describe why the change was made:

BMP: Septic Smart - Septic System Maintenance

Message Description and Distribution Method:

Septic System Maintenance - A brochure created by the EPA that was handed out at the transfer station informing septic owners of about how septic systems work as well as encouraging proper septic system

maintenance.

This brochure can be viewed on the Town's website at:

<https://www.windhamnh.gov/DocumentCenter/View/7090/Septic-System-Maintenance-Brochure?bidId=>

Targeted Audience: Residents

Responsible Department/Parties: DPW Operations

Measurable Goal(s):

Handled out approximately 250 pamphlets at the Town Transfer Station to residents. It was also posted on the Town website.

Message Date(s): June 24, 2023

Message Completed for: Appendix F Requirements ☒ Appendix H Requirements ☒

Was this message different than what was proposed in your NOI? Yes ☐ No ☒

If yes, describe why the change was made:

Add an Educational Message

MCM2: Public Participation

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

We maintain a Town Website page on stormwater which urges residents to get involved.

Was this opportunity different than what was proposed in your NOI? Yes ☐ No ☒

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

MCM3: Illicit Discharge Detection and Elimination (IDDE)**Sanitary Sewer Overflows (SSOs)**

Check off the box below if the statement is true.

- ☒ This SSO section is NOT applicable because we DO NOT have sanitary sewer

Below, report on the number of SSOs identified in the MS4 system and removed during this reporting period.

Number of SSOs identified:

Number of SSOs removed:

MS4 System Mapping

Optional: Provide additional status information regarding your map:

Screening of Outfalls/Interconnections

If conducted, please submit any outfall monitoring results from this reporting period. Outfall monitoring results should include the date, outfall/interconnection identifier, location, weather conditions at time of sampling, precipitation in previous 48 hours, field screening parameter results, and results from all analyses. Please also include the updated inventory and ranking of outfalls/interconnections based on monitoring results.

- ☐ No outfalls were inspected
- ☐ The outfall screening data is attached to the email submission
- ☒ The outfall screening data can be found at the following publicly available website:

Below, report on the number of outfalls/interconnections screened during this reporting period.

Number of outfalls screened:

Below, report on the percent of total outfalls/ interconnections screened to date.

Percent of outfalls screened:

Optional: Provide additional information regarding your outfall/interconnection screening:

The above data was based on screening dry outfalls.

Catchment Investigations

If conducted, please submit all data collected during this reporting period as part of the dry and wet weather investigations. Also include the presence or absence of System Vulnerability Factors for each catchment.

- ☒ No catchment investigations were conducted
- ☐ The catchment investigation data is attached to the email submission
- ☐ The catchment investigation data can be found at the following publicly available website:

Below, report on the number of catchment investigations completed during this reporting period.

Number of catchment investigations completed this reporting period:

Below, report on the percent of catchments investigated to date.

Percent of total catchments investigated:

Optional: Provide any additional information for clarity regarding the catchment investigations below:

IDDE Progress

If illicit discharges were found, please submit a document describing work conducted over this reporting period, and cumulative to date, including location source; description of the discharge; method of discovery; date of discovery; and date of elimination, mitigation, or enforcement OR planned corrective measures and schedule of removal.

- ☒ No illicit discharges were found
- ☐ The illicit discharge removal report is attached to the email submission
- ☐ The illicit discharge removal report can be found at the following publicly available website:

Below, report on the number of illicit discharges identified and removed, along with the volume of sewage removed during this reporting period.

Number of illicit discharges identified:

Number of illicit discharges removed:

Estimated volume of sewage removed: gallons/day

Below, report on the total number of illicit discharges identified and removed to date. At a minimum, report on the number of illicit discharges identified and removed since the effective date of the permit (July 1, 2018).

Total number of illicit discharges identified:

Total number of illicit discharges removed:

Optional: Provide any additional information for clarity regarding illicit discharges identified, removed, or planned to be removed below:

Employee Training

Describe the frequency and type of employee training conducted **during this reporting period**:

Coalition information has been disseminated to stormwater committee members. Additional in person IDDE training (Catchment investigations, sampling & outfall screening).

MCM4: Construction Site Stormwater Runoff Control

*Below, report on the construction site plan reviews, inspections, and enforcement actions completed **during this reporting period**.*

Number of site plan reviews completed: 42

Number of inspections completed: 152

Number of enforcement actions taken: 0

Optional: Enter any additional information relevant to construction site plan reviews, inspections, and enforcement actions:

Enforcement actions were not necessary - the matters were resolved by verbal communication.

MCM5: Post-Construction Stormwater Management in New Development and Redevelopment**Ordinance or Regulatory Mechanism**

Date update was completed (due in year 3): June 22, 2020

Website of ordinance or regulatory mechanism:

Site Plan Regulations updated April 2023

<https://www.windhamnh.gov/DocumentCenter/View/541/Site-Plan-Regulations-PDF?bidId=>

Subdivision Regulations updated April 2023

<https://www.windhamnh.gov/DocumentCenter/View/542/Subdivision-Regulations-PDF?bidId=>

As-built Drawings

Below, report on the number of as-built drawings received during this reporting period.

Number of as-built drawings received: 63

Optional: Enter any additional information relevant to the submission of as-built drawings:

Street Design and Parking Lots Report

Below, describe any changes made or planned to be made to local regulations and guidelines based on the report completed in Year 4:

None.

Green Infrastructure Report

Below, describe progress towards making green infrastructure practices allowable based on the report completed in Year 4:

None.

Retrofit Properties Inventory

Below, list all properties that have been modified or retrofitted with BMPs to mitigate impervious area that were inventoried as part of 2.3.6.e of the permit. Non-MS4 owned properties that have been modified or retrofitted with BMPs to mitigate impervious area may also be listed, but must be indicated as non-MS4.

Cemetery on the Plains - 11 Cobbetts Pond Rd (21-W-6)

MCM6: Good Housekeeping**Catch Basin Cleaning**

Below, report on the number of catch basins inspected and cleaned, along with the total volume of material removed from the catch basins during this reporting period.

Number of catch basins inspected: 40

Number of catch basins cleaned: 0

Total volume or mass of material removed from all catch basins: 0 [Select Units]

Below, report on the total number of catch basins in the MS4 system.

Total number of catch basins: 2,800

If applicable:

Report on the actions taken if a catch basin sump is more than 50% full during two consecutive routine inspections/cleaning events:

Frequency of cleaning increased as necessary.

Street Sweeping

Report on the number of miles swept during this reporting period below.

Number of miles cleaned: 114

Report either the volume or weight of street sweeping materials collected during this reporting period below.

☐ Volume of material removed: cubic yards

☒ Weight of material removed: 315,000 pounds

Stormwater Pollution Prevention Plan (SWPPP)

Below, report on the number of site inspections for facilities that require a SWPPP completed during this reporting period.

Number of site inspections completed: 8

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

None.

Additional Information

Monitoring or Study Results

Results from any other stormwater or receiving water quality monitoring or studies conducted during the reporting period not otherwise mentioned above, where the data is being used to inform permit compliance or permit effectiveness must be attached.

- ☒ Not applicable
- ☐ The results from additional reports or studies are attached to the email submission
- ☐ The results from additional reports or studies can be found at the following website(s):

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:

Additional Information

Optional: Enter any additional information relevant to your stormwater management program implementation during the reporting period. Include any BMP modifications made by the MS4 if not already discussed above. If any of the above year 5 requirements could not be completed due to the impacts of COVID-19, please identify the requirement that could not be completed, any actions taken to attempt to complete the requirement, and reason the requirement could not be completed below:

At the March 2023 Annual Town Election, the Town voted to support adding an Environmental Planner position to the Community Development Department. A big part of this position's responsibility will be to manage the Town's MS4 stormwater program and enforce the aforementioned septic ordinance. Additionally, catch basin cleaning for year 5 was/is being completed during the week of September 18, 2023 and will continue until roughly 950-1100 catchbasins have been cleaned. The significant amount of rain caused the company the Town has contracted to be delayed in their catchbasin cleaning schedule. This was the soonest time they were able to complete work for the town of Windham.

Activities Planned for Next Reporting Period

Please confirm that your SWMP has been, or will be, updated to comply with all applicable permit requirements including but not limited to the year 6 requirements summarized below. (Note: impaired waters and TMDL requirements are not listed below)

Yes, I agree ☒

Annual Requirements

- Annual report submitted and available to the public
- Annual opportunity for public participation in review and implementation of SWMP
- Keep records relating to the permit available for 5 years and make available to the public

- Properly store and dispose of catch basin cleanings and street sweepings so they do not discharge to receiving waters
- Annual training to employees involved in IDDE program
- Update inventory of all known locations where SSOs have discharged to the MS4
- Continue public education and outreach program
- Update outfall and interconnection inventory and priority ranking and include data collected in connection with the dry weather screening and other relevant inspections conducted
- Implement IDDE program
- Review site plans of construction sites as part of the construction stormwater runoff control program
- Conduct site inspection of construction sites as necessary
- Inspect and maintain stormwater treatment structures
- Log catch basins cleaned or inspected
- Sweep all curbed streets at least annually
- Continue investigations of catchments associated with Problem Outfalls
- Implemented SWPPPs for all permittee owned or operated maintenance garages, public works yards, transfer stations, and other waste handling facilities
- Review inventory of all permittee owned facilities in the categories of parks and open space, buildings and facilities, and vehicles and equipment; update if necessary
- Review O&M programs for all permittee owned facilities; update if necessary
- Implement all maintenance procedures for permittee owned facilities in accordance with O&M programs
- Implement program for MS4 infrastructure maintenance to reduce the discharge of pollutants
- Enclose all road salt storage piles or facilities and implemented winter road maintenance procedures to minimize the use of road salt
- Review as-built drawings for new and redevelopment to ensure compliance with post construction bylaws, regulations, or regulatory mechanism consistent with permit requirements
- Inspect all permittee owned treatment structures (excluding catch basins)
- Identify additional permittee-owned properties that could potentially be modified or retrofitted with BMPs to reduce impervious areas so that the permittee maintains a minimum of 5 sites in their inventory, until such a time when the permittee has less than 5 sites remaining

Provide any additional details on activities planned for permit year 6 below:

In Year 6, we will fill the Environmental Planner position, begin enforcing the septic system pump-out and inspection ordinance, and continue to carry out the permit requirements. We plan to complete the Cemetery on the Plains BMP.

Part V: Certification of Small MS4 Annual Report 2023**40 CFR 144.32(d) Certification**

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate 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, I certify that 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.

Name:

Brian McCarthy

Title:

Town Administrator

Signature:



Date:

9/27/23

*[Signatory may be a duly authorized
representative]*