

Year 6 Annual Report

New Hampshire Small MS4 General Permit


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

Windham, New Hampshire

EPA NPDES Permit Number NHR041035

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: Brian McCarthy	
Title: Town Administrator	
Signature: 	Date: 9/27/24

Authorized Representative:

The authorization letter is:

Attached to this document (document name listed below):

N/A

Publicly available at the website:

N/A

Primary MS4 Program Manager Contact Information:

Name: Brian McCarthy	Title/Position: Town Administrator	
Department: Administration		
Street Address: 4 North Lowell Rd		
City: Windham	State: New Hampshire	Zip Code: 03087
Email: TownAdmin@windhamnh.gov	Phone Number: 603 432 7732	

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):

https://www.epa.gov/npdes-permits/regulated-ms4-new-hampshire-communities

Compliance activities have been identified and described in the Windham 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: https://www.windhamnh.gov/DocumentCenter/View/17065/SWMP-2024 Physical copies located at the Administration Building (4 North Lowell Rd, Windham NH 03087) and the Community Development Department (3 North Lowell Rd, Windham, NH 03087)
Date SWMP was Last Updated: September 2024
IDDE Program Plan: https://www.windhamnh.gov/DocumentCenter/View/17064/IDDE-Plan-2024
Updated System Map: Appendix B of IDDE Plan
Progress on Completion of System Map: Appendix B of IDDE Plan
Updated SSO Inventory: Section 4 of IDDE Plan
Updated Inventory and Ranking of Outfalls/Interconnections: https://www.windhamnh.gov/DocumentCenter/View/17005/Outfall-and-Interconnection-Priority-Ranking-Year-6
Dry Weather Screening Data: https://www.windhamnh.gov/DocumentCenter/View/17001/Year-6-Dry-Weather-Outfall-Screening-Year-6
Wet Weather Screening Data: N/A – no wet weather screening completed as of Year 6 report
Catchment Investigation Data: https://www.windhamnh.gov/DocumentCenter/View/17002/Catchment-Inventory-and-Investigations-Year-6
System Vulnerability Factors: https://www.windhamnh.gov/DocumentCenter/View/17005/Outfall-and-Interconnection-Priority-Ranking-Year-6
Illicit Discharge Removal Report: https://www.windhamnh.gov/DocumentCenter/View/17003/Illicit-Discharge-Tracking-Sheet-Year-6
Results from additional stormwater or receiving water quality monitoring reports or studies: N/A

PTAP 2024 Nutrient Reduction Report: N/A

Salt Reduction Plan: N/A – anticipated date Year 7

Annual Salt Usage Report <https://www.windhamnh.gov/DocumentCenter/View/17006/Salt-Usage-Report-2024-Year-6>

Updated Nitrogen Source Identification Report: N/A

PTAP 2024 Nutrient Reduction Report: N/A

Windham, NH Nutrient Tracking Program Report: N/A

Updated Phosphorus Source Identification Report:

<https://www.windhamnh.gov/DocumentCenter/View/17000/Phosphorus-Source-Identification-Report-2024-Year-6>

PTAP 2024 Nutrient Reduction Report: N/A – Town intends on using PTAP in the future, but no data available for Year 6.

Windham, NH Nutrient Tracking Program Report: N/A – Town intends on using PTAP in the future, but no data available for Year 6.

Street Sweeping Schedule: <https://www.windhamnh.gov/DocumentCenter/View/17016/Tentative-Street-Sweeping-Schedule>

Chloride Reduction Plan: <https://windhamnh.gov/DocumentCenter/View/16772/Salt-Reduction-Plan-2011-Revised-2016?bidId=>

<https://www.nhms4.des.nh.gov/sites/g/files/ehbemt636/files/documents/2022-09/dinsmore.pdf>

Annual Salt Usage Report: <https://www.windhamnh.gov/DocumentCenter/View/17006/Salt-Usage-Report-2024-Year-6>

Lake Phosphorus Control Plan: N/A

PTAP 2024 Nutrient Reduction Report: N/A

Windham, NH 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 checked="" type="checkbox"/> Bacteria/Pathogens	<input checked="" type="checkbox"/> Chloride	<input type="checkbox"/> Nitrogen
<input checked="" type="checkbox"/> Phosphorus	<input checked="" type="checkbox"/> Solids/Oil/Grease (Hydrocarbons)/Metals	
TMDL(s)		
<input checked="" 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:

(Added) NHLAK700061102-08 – Seavey Pond – Dissolved Oxygen/Oxygen Saturation, pH

(Added) NHRIV700061203-22 – Beaver Brook – Benthic Macroinvertebrate Bioassessments (Streams)

(Added) NHRIV700061204-06 – Connies Brook – Chloride

(Removed, not on most recent 305(b)/303(d) list) NHLAK700061204-01-03 – Cobbetts Pond Town Beach – Dissolved Oxygen/Oxygen Saturation

TMDL:

(Added) NHRIV700061203-22 – Beaver Brook – E.Coli

NHLAK700061204-01-03 – Cobbetts Pond Town Beach – E.Coli (TMDL approved during 2018 assessment cycle)

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 132 outfall(s) have added.

A total of 2 outfall(s) have removed.

No

Windham 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:

In Year 6 (August 8, 2024), an Environmental Planner was hired for the Town of Windham. At this point, more resources within the Town were made available to work on MS4 requirements including mapping and screening of outfalls. Significant effort has been made by the Town to accurately map the Town's stormwater assets and the connectivity between structures. In doing so, many more outfalls were mapped and inventoried during the last reporting year. Continuous efforts being are being made by the Town to achieve compliance.

Two outfalls were removed from the list of outfalls in the NOI in the last year due to them being determined to be outside the boundaries of the MS4 (Outfall 14 and 15). In total, 132 outfalls have been mapped as of the end of year 6 (June 30, 2024) and determined to reach surface waters of the United States.

There are approximately 43 outfalls that have been mapped in year 6 but have not been confirmed if they have concentrated flow that reaches Waters of the United States (categorized as "TBD" currently), therefor they have not been officially added until that determination is made. The Town intends on returning to these outfalls to look for evidence of flow reaching a surface water in the coming year.

In addition, 24 outfalls were mapped in year 6, but do not need to be sampled/screened for MS4 permit requirements due to either being outside of the MS4 boundaries, as part of another larger catchment, has no municipal connections, or there is no evidence of discharge reaching Waters of the United States.

Minimum Control Measures

MCM 1: Public Education

Total number of all MS4 related educational efforts completed *during this reporting period*: 30

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

No.

Yes. Windham, NH made changes to overall outreach goals and approaches.

BMP: 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.

Description:

Distribution and promotion of “Green Grass and Clean Water” and municipally created flyers, mailers, postcards, videos, and social media posts. “Green Grass and Clean Water” materials were 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.

During year 6, the Town voted in a zoning ordinance that prohibits use of fertilizer within 200 ft of the prevailing high-water mark of any public waterbody or their tributaries or wetlands, the Town produced an informational flyer with fertilizer alternatives and distributed this information via mailers to landscapers and posted this flyer on the Town’s social media.

The Town of Windham invited and encouraged residents to attend *Protect our Ponds: Understanding Watersheds and Cyanobacteria* hosted by Pelham, New Hampshire on 4/6/2024.

Targeted Audience:

Residential *and* Business and Institutions

Responsible Department/Parties:

Community Development Department

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 = 0 flyers

Year 6 = Approximately 405 mailers

Following is the number of impressions the social media posts received **during this reporting period:**

Year 6 = 1 impression

Two Windham town residents attended the event hosted by Pelham: *Protect our Ponds: Understanding Watersheds and Cyanobacteria* **during this reporting period.**

Goal was achieved.

Message Dates: 3/8/2024, 3/11/2024, 4/6/2024, 4/25/2024

BMP: Pet Waste Disposal

Outreach Resources:

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

Description:

Distribution and promotion of “Every Drop” or municipally created flyers, mailers, postcards, brochures, or videos with educational information about proper pet waste management, impacts of improper management, pet waste ordinance, and disposal requirements messaging. May include the “Every Drop” pledge to pick up pet waste to be made available during dog registration and other events or venues (veterinarians, dog training, groomers, etc.). Every Drop is a collaborative education effort with PREP, NHDES, and other partners.

Targeted Audience:

Residents - Pet Owners

Responsible Department/Parties:

Community Development Department

Measurable Goal(s):

Dog owners and dog walkers are aware of the potential water quality impacts from pet waste, local pet waste ordinances, and how to dispose of pet waste properly. If pledges are signed, there will be an increase of dog owners committed to picking up pet waste.

Following is the number of residents that pledged through the PREP “Every Drop” website **during this reporting period:**

Year 6 = 2

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

Year 6 = 0 of flyers

Year 6 = 0 mailers

Year 6 = 0 postcards

Year 6 = 234 brochures

The Town also posted a few social media posts that collectively had 16 impressions.

Goal was achieved.

Message Date: Summer and time of license renewal.

BMP: 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.

Description:

Distribution and promotion of municipally created flyers, brochures, pledges, door hangers, and videos 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 Business and Institutions

Responsible Department/Parties:

Community Development Department

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, brochures, and door hangers that were distributed **during this reporting period:**

Year 6 = 0 flyers

Year 6 = 305 brochures

Year 6 = 0 door hangers

Additional social media posted on Windham's social media accounts 11/1/2023 with 3 impressions (like, share, comment).

Goal was achieved.

Message Date: Fall, (10/6/2023, 10/7/2023, 11/2/2023), 3/8/2024

BMP: Septic System Maintenance

Outreach Resources:

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

Description:

Distribution and promotion of Get Pumped NH, EPA, and municipally created brochures, letters, videos, and social media posts educating New Hampshire homeowners with septic systems on how to identify, locate and maintain those systems. Get Pumped NH is a collaborated effort between the New Hampshire Association of Septage Haulers (NHASH) and the NHDES.

Targeted Audience:

Septic System Owners

Responsible Department/Parties:

Community Development Department

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 brochures and letters that were distributed **during this reporting period:**

Year 6 = 681 brochures

Year 6 = 58 letters*

*The letters were sent in the same mailing as some of the brochures that got sent out to provide context for homeowners/ why they were receiving these letters (in a bacteria impaired waterbody watershed).

Following is the number of impressions the social media posts received **during this reporting period**:

Year 6 = 89 impressions

Goal was achieved.

Message Date: 9/18/23, 9/19/23, 9/20/23 9/21/23, 10/4/23, 1/3/24 (social media and mailings), 2/21/24, 3/4/24, 3/12/24 (2 different messages).

BMP: Construction/Developers Outreach

Outreach Resources:

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

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

Targeted Audience:

Construction/Developers

Responsible Department/Parties:

Community Development Department

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 fact sheets that were distributed to contractors, developers, and municipal or local organizations **during this reporting period**:

Year 6 = 6 CGP fact sheets

Year 6 = 6 BMP fact sheets

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

Year 6 = 6 letters

Windham held 3 pre-construction meetings, representing 100% of projects that received planning board approval and began construction **during this reporting period**.

Goal was achieved.

Message Date: 4/15/2024

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

The Town of Windham hired an Environmental Planner who began in Year 6 on August 8, 2024.

During Year 6, the Town made updates to the stormwater booth located at the Transfer Station. This booth is located in a highly visible area and displays educational materials on various stormwater related topics which are typically either the educational outreach that is distributed throughout the year or NHDES fact sheets that are relevant to the current season.

During Year 6, the Town of Windham updated 5 brochures for educational outreach (originally produced in-house) to include more information and be more visually appealing to readers. The following brochures have been updated: Pet Waste Disposal Guide, Stormwater for Developers, Stormwater for Industrial, Stormwater Guide for Residents, and Stormwater Guidance for Businesses.

Windham's Stormwater Management web page was updated during year 6 to have educational outreach available online in one central location for ease of access.

Additional outreach was distributed during year 6 which includes the following:

Stormwater Guidance for Businesses – a general stormwater guide for businesses sent to landscapers within the Town of Windham on 3/8/2024.

Social media post for National Stormwater Day which provided a link to NHDES Stormwater page where people can get more information about stormwater topics on 11/16/2023.

MCM 2: Public Participation

- Provided an opportunity for public participation in review and implementation of SWMP and complied with State Public Notice requirements as described in the Windham SWMP.
- Kept records relating to the permit 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 reviewed at the Stormwater Management Webpage (<https://www.windhamnh.gov/450/Stormwater-Management>) and is available to the public at the Community Development Department and the Administration Building. Documents and records relating to the permit are retained and available for 5 years to the public at <https://www.windhamnh.gov/450/Stormwater-Management> and the Community Development Department.

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

No.

Yes. Windham made the following changes: Stormwater Management Committee meetings are open to the public to allow for public input.

Measurable Goal(s):

Input was received and records are maintained.

Goal was achieved.

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

Various Stormwater Management Committee meetings were open to the public during year six.

Windham, New Hampshire has conducted the following public involvement or participation opportunities:

The Town of Windham invited and encouraged residents to attend *Protect our Ponds: Understanding Watersheds and Cyanobacteria* hosted by Pelham, New Hampshire. Two town residents attended.

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

The Town of Windham offers various methods through which residents can access the SWMP. On the Town's Stormwater Management page, the SWMP is available and visitors to the site are encouraged to email the Environmental Planner with any comments. The Town intends on announcing when the new version of the SWMP is released to the public and allowing for comment as well at that time. Additionally, the Town maintains copies of the SWMP at the Administration building as well as the Community Development Department. The Town is currently in the process of making updates to this document and intends on announcing when the updated version is complete in an effort to notify and receive feedback from the public.

MCM 3: Illicit Discharge Detection and Elimination (IDDE)

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

MS4 System Mapping

Updated **Phase 1** system map due in Year 2 as necessary:

Provide additional status information regarding your map:

Map of storm sewer system and associated outfalls was updated in Year(s) 6 and there were updates in Year 6. Map of storm sewer system and associated outfalls is continually updated to reflect findings and changes.

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

Percent of Phase 2 map completed: approximately 50% as of June 30, 2024.

Provide additional status information regarding your map:

Map of storm sewer system, catchments, and related elements was updated in Year(s) 2019 and there were updates in Year 6. Map of storm sewer system, catchments, and related elements is continually updated to incorporate findings and changes from catchment investigations.

Screening of Outfalls/Interconnections

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 here: <https://www.windhamnh.gov/DocumentCenter/View/17001/Year-6-Dry-Weather-Outfall-Screening-Year-6>

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

Number of outfalls/interconnections screened **during this reporting period**: 60

60 outfalls were screened and confirmed as reaching Waters of the United States during Year 6. There were also 8 additional outfalls that were screened despite the outfalls either not being confirmed as reaching WOTUS or after the initial screening, the outfalls were determined to not need screening at all per the MS4 permit. This may have been due to the outfalls being determined to be outside of the MS4 boundaries, as part of another larger catchment, had no municipal connections, or there was no evidence of discharge reaching WOTUS.

Percent of total known outfalls/interconnections screened **to date (Year 1 – Year 6)**:
Approximately 53%

To date, the number of outfalls/interconnections screened are those that have been mapped since year 1 that have been confirmed as reaching Waters of the United States. This percentage does not reflect the number of outfalls that are still being determined if they reach WOTUS or the number of outfalls that have been mapped but determined to not need sampling due to either being outside of the MS4 boundaries, as part of another larger catchment, there are no municipal connections, or there is no evidence of discharge reaching WOTUS.

The inventory and ranking of outfalls/interconnections was updated in Year 6 and the IDDE Program Plan was revised as a result. The revised inventory and ranking of outfalls/interconnections can be found here:

<https://www.windhamnh.gov/DocumentCenter/View/17005/Outfall-and-Interconnection-Priority-Ranking-Year-6>

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

Catchment Investigations

- Catchment investigations were conducted, and data can be found here:
<https://www.windhamnh.gov/DocumentCenter/View/17002/Catchment-Inventory-and-Investigations-Year-6>

Number of catchment investigations **during this reporting period**: 11. 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)**: 15.3%

The percentage of total catchments investigated is based on the number of confirmed outfalls. This number does not include outfalls that have been determined as not needing sampling due to being outside MS4, having no municipal connectivity, or discharge does not reach WOTUS. Additionally, this does not include outfalls that are ranked TBD due to the receiving water being currently unknown (if the flow reaches WOTUS and if so, which WOTUS specifically).

IDDE Progress

- No illicit discharges were found **during this reporting period**.
- Illicit discharges were found but not removed **during this reporting period**.

Two illicit discharges have been confirmed, but no source has been identified. One illicit discharge was detected during a routine dry weather outfall screening and was identified by the high hit of E. coli. The Town completed a catchment investigation including collecting Human and Total Bacteroides as well as collecting additional E. coli samples at specific locations in an attempt to narrow down where the bacteria is coming from. Based on the catchment investigation and resampling, it appears that the source is non-human coming from the surface water stream entering into the closed drainage system. While it appears that the source of E. coli is not human-related, the Town will continue to make efforts in this area in an attempt to locate and ultimately eliminate the illicit discharge that was detected. More in depth reporting regarding this investigation can be found in Appendix G of Windham's IDDE Plan.

The second illicit discharge identified where the source from which it is coming from has not been located, was in the form of improperly disposed of pet waste bags. The Town has made two attempts in the form of outreach (letter and pet waste disposal brochure) to mitigate the source and reach the person(s) responsible for the illicit discharge (pet waste), but the continued illegal dumping of pet waste in/around drainage structures has been observed since the initial discovery in Spring 2024. The Town has removed located pet waste bags on multiple occasions at this site. The Town will continue to send outreach to property owners in the area of the located disposal site and intends on spray painting “no dumping” (or similar message) on road nearby where the illicit discharge was located as well as continuing to monitor this area. More in depth reporting regarding this investigation can be found in Appendix G of Windham’s IDDE Plan.

- Illicit discharges were removed **during this reporting period** and the illicit discharges removal report can be found here: <https://www.windhamnh.gov/DocumentCenter/View/17003/Illicit-Discharge-Tracking-Sheet-Year-6>

Number of illicit discharges identified **during this reporting period**: 4

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

When the Town has returned to the location of the improper pet waste bag dumping, the located bags have been removed by the Town. Over 100 pet waste bags have been collected and disposed of by the Town, however, as it seems this is an ongoing issue, this was *not* counted in the number of illicit discharges removed during this reporting period.

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

*See illicit discharge removal report

Total number of illicit discharges identified **since the effective date of the permit (July 1, 2018 – June 30, 2024)**: 9

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

Employee Training

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

Windham held an IDDE training session for municipal staff on 12/20/2024. In addition, Windham routinely provides IDDE materials and training, including information on how to identify illicit discharges and SSOs are made available to applicable employees in accordance with IDDE Program Plan. Training logs are included in Appendix F of the IDDE Program Plan.

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

The Town intends on expanding the audience for IDDE trainings in the future.

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*: 38

Number of inspections completed *during this reporting period*: 22

Number of enforcement actions taken *during this reporting period*: 10

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

Not Applicable

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

Ordinance or Regulatory Mechanism

- Windham has a regulatory mechanism(s) consistent with permit requirements.
Date regulatory mechanism(s) was adopted: 2019. The regulatory document can be found at: <https://windhamnh.gov/DocumentCenter/View/7192/Post-Construction-Stormwater-Standards>
- Windham has not drafted or adopted a regulatory mechanism(s) consistent with permit requirements.

As-built Drawings

Number of as-built drawings received *during this reporting period*: 48

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 or Guidelines** *during this reporting period*.

Green Infrastructure Reports

- 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** *during this reporting period*.

Retrofit Properties Inventory

- Windham has identified the remaining permittee-owned properties that could be modified or retrofitted with BMPs to mitigate impervious areas and of which are included in the list below:

List of MS4 Properties:

<https://www.nhms4.des.nh.gov/sites/g/files/ehbemt636/files/documents/2022-09/priority-ranking-windham.xlsx>

List of Non-MS4 Properties: None

- Windham has modified or retrofitted the following MS4 and/or Non-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 as well as the type of BMP(s) that were implemented:

List of MS4 Properties: None

List of Non-MS4 Properties: None

In the Year 5 annual report, the Town reported that Cemetery on the Plains located at 11 Cobbetts Pond Rd (21-W-6) was retrofitted with a BMP (per MCM5) to mitigate impervious area. After further consideration, the Town has determined that the drainage improvements installed at this parcel had the primary focus of flood mitigation/conveyance rather than reduction of impervious area.

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

Not Applicable.

MCM 6: Good Housekeeping

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:

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.

The Town has identified one catch basin that has been either 50% or more for two consecutive years/cleanings. The town intends on developing a schedule to address this catch basin in the coming year within available town resources.

Number of catch basins inspected **during this reporting period:** 833

Number of catch basins cleaned **during this reporting period:** 776

Total volume **or** mass of material removed from **all** catch basins **during this reporting period:** 330 tons

Total number of catch basins within the MS4 system: 2800

During year 5, catch basin cleaning was delayed until September 2023 and was completed in October 2023. 316 catch basins were cleaned during that round of cleaning with a total of 175 tons of material removed.

Year 6 catch basin cleaning began in April 2024 and was completed in May 2024.

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 swept at least once *during this reporting period*.

Number of (lane) miles swept *during this reporting period*: 114

Mass of swept material *during this reporting period*: 270 tons

Stormwater Pollution Prevention Plan (SWPPP)

Windham 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*: 8

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.

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.

A review of all permittee-owned facilities was completed and the inventory has been updated. The SWMP has been updated to reflect this and includes the following additional facilities:

Searles Chapel added to Buildings and Facilities

Cemetery on New Plains and Cemetery on the Plains added to Parks and Open Space Inventory

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.

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.

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

During Year 6, the Town constructed a covered structure at the highway garage which will cover heavy vehicles and equipment.

The Town of Windham intends on reassessing the Operations and Maintenance Programs in year 7 to aim to fulfill all requirements.

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: Refer to additional information section below.

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 here:

<https://www.windhamnh.gov/DocumentCenter/View/17006/Salt-Usage-Report-2024-Year-6>.

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:

Town is going to be working to create a Salt Reduction Plan to fulfill Appendix H Chloride Impairment Requirements.

Nitrogen Impairment (Appendix H)

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

Phosphorus Impairment (Appendix H)

- Permittee **does not** have a phosphorus impairment.
- Permittee **has** a phosphorus impairment.
 - Distributed an annual message that encourages the proper use and disposal of grass clippings and encourages the proper use of slow-release fertilizers **during this reporting period.**
 - Distributed an annual message encouraging the proper management of pet waste, including noting any existing ordinances where appropriate **during this reporting period.**
 - Distributed an annual message encouraging the proper disposal of leaf litter **during this reporting period.**
 - Increased street sweeping frequency of all municipal owned streets and parking lots subject to Permit part 2.3.7.d.iii to a minimum of two times per year (spring and fall) **during this reporting period.**
 - Increased street sweeping frequency of all municipal owned streets and parking lots subject to Permit part 2.3.7.d.iii to a minimum of one time per year (spring) and implemented a fall leaf litter collection program in lieu of post-drop street sweeping **during this reporting period.**

Phosphorus Source Identification Report- Update

Structural BMPs

- The Phosphorus Source Identification Report was **updated during this reporting period** and can be found here: <https://www.windhamnh.gov/DocumentCenter/View/17000/Phosphorus-Source-Identification-Report-2024-Year-6> An updated list of the planned structural BMPs and a plan and schedule for implementation can be found in *Section 2: Potential Structural BMPs Report (Year 5) part II.1.c.ii* of the Phosphorus Source Identification Report.
- Windham has **not** installed a minimum of one structural BMP(s) as a demonstration project within the drainage area of the water quality limited water or its tributaries **by the end of this reporting period.** Windham plans to install a structural BMP(S) either in the Fall of 2024 or Spring of 2025.
- No BMPs were installed **during this reporting period.** The implementation schedule is outlined in *Section 2: Potential Structural BMPs Report (Year 5) in Part II.1.c.i* of the Phosphorus Source Identification Report. The total estimated phosphorus removed from the installed BMP(s) is 0 lbs/year.

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

N/A

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**. Windham street sweeping schedule can be found here:
<https://www.windhamnh.gov/DocumentCenter/View/17016/Tentative-Street-Sweeping-Schedule>

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

The Town was unable to increase street sweeping due to budgetary reasons but intends on proposing additional budget request during year 7 to accomplish this requirement. The attached street sweeping schedule reflects proposed sweeping times, not current practices.

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 here:

<https://windhamnh.gov/DocumentCenter/View/16772/Salt-Reduction-Plan-2011-Revised-2016?bidId=>

<https://www.nhms4.des.nh.gov/sites/g/files/ehbemt636/files/documents/2022-09/dinsmore.pdf>

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 here:

<https://www.windhamnh.gov/DocumentCenter/View/17006/Salt-Usage-Report-2024-Year-6>.

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:

In Year 7, the Town intends on assessing the linked Chloride Reduction Implementation Plan for Dinsmore Brook Watershed Plan (developed in 2011) and Windham NH's Salt Reduction Plan that was originally developed in 2011 and updated in 2016. The Town will re-evaluate the current Plan and develop an action plan to complete a comprehensive Chloride Reduction Plan that fulfills the requirements in Appendix F for all waterbodies with chloride TMDLs located within the town's regulated area.

Lake and Pond Phosphorus TMDL (Appendix F)

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

Additional Required Information

Monitoring or Study Results

Results from all stormwater or receiving water quality monitoring or studies conducted **during the reporting period** and **not otherwise mentioned above**, where the data is being used to inform permit compliance or permit effectiveness is:

- Not applicable.

Description of Any Changes in Identified BMPs or Measurable Goals

Windham, NH has implemented activities in accordance with the permit and outlined in the SWMP. All BMPs and measurable goals outlined in the SWMP are appropriate.

Activities Planned for Next Reporting Period

Windham, NH will continue to implement activities in accordance with the permit and SWMP.