

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:

EPA NPDES Permit Number:

Primary MS4 Program Manager Contact Information

Name:

Title:

Street Address Line 1:

Street Address Line 2:

City:

State:

Zip Code:

Email:

Phone Number:

Stormwater Management Program (SWMP) Information

SWMP Location (publicly available web address):

Date SWMP was Last Updated:

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:

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

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:

Summary of Changes:

Added NHRIV700040401-04, Scab Mill Brook; Aluminum, Dissolved Oxygen, pH

Added NHRIV700040401-05, Spaulding Brook; pH

Added NHRIV700060906-04, Hartshorn Brook; pH

Added NHRIV700061001-02, Witches Brook; Dissolved Oxygen, pH

Revised NHRIV700060904-07, Purgatory Brook; pH

Revised NHRIV700060906-08, Great Brook; pH

Revised NHRIV70006-0906-12, Great Brook - Ox Brook; Dissolved Oxygen, pH

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:**

*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: Grass and Fertilizer

Message Description and Distribution Method:

Distribution and promotion of “Green Grass and Clean Water” brochures. “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. Brochures were provided for people to take at five locations in town including the town hall, community development office, fire department, library, and DPW.

Targeted Audience:

Responsible Department/Parties:

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. 125 brochures were displayed at 5 locations, 33 of which were taken.

Message Date(s):

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: Pet Waste Disposal

Message Description and Distribution Method:

Distribution and promotion of “Scoop the Poop” flyers and brochures with educational information about proper pet waste management, impacts of improper management, pet waste ordinance, and disposal requirements messaging. Materials were handed out and made available during dog registration. Brochures were also provided for people to take at five locations in town including the town hall, community development office, fire department, library, and DPW.

Targeted Audience: Residents

Responsible Department/Parties: Department of Public Works/Town Engineer

Measurable Goal(s):

Dog owners and/or 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. Flyers went out with most, if not all of the 2,400 dog registration licenses in 2023. 125 brochures were displayed at 5 locations, 55 of which were taken.

Message Date(s): Spring 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: Disposal of Leaf and Grass Clippings

Message Description and Distribution Method:

Distribution and promotion of "Rake it or Leave it" brochures with messaging about impacts from yard waste to waterbodies, alternatives to dumping yard waste, and laws against dumping yard waste near or in waterbodies. Brochures were provided for people to take at five locations in town including the town hall, community development office, fire department, library, and DPW.

Targeted Audience: Residents

Responsible Department/Parties: Department of Public Works/Town Engineer

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. 125 brochures were displayed at 5 locations, 66 of which were taken.

Message Date(s): Spring 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 System Maintenance

Message Description and Distribution Method:

Distribution and promotion of "Get Pumped NH" brochures 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 New Hampshire Department

of Environmental Services (NHDES). Brochures were provided for people to take at five locations in town including the town hall, community development office, fire department, library, and DPW.

Targeted Audience: Septic System Owners

Responsible Department/Parties: Department of Public Works/Town Engineer

Measurable Goal(s):

Residents are aware of water quality impacts from septic systems, the importance of maintaining septic systems, and how to maintain them. 125 brochures were displayed at 5 locations, 31 of which were taken.

Message Date(s): Spring 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: Industrial Outreach

Message Description and Distribution Method:

Provided an outreach letter and Industrial Facilities Fact Sheet to the industrial facilities that are located within the NH MS4 regulated area to educate them on both the new and updated requirements within the EPA 2021 Multi-Sector General Permit, and the 2017 NH MS4 General Permit.

Targeted Audience: Industrial facilities

Responsible Department/Parties: Department of Public Works/Town Engineer

Measurable Goal(s):

Operators and managers of industrial facilities are made aware of the updates and changes made to the EPA 2021 Multi-Sector General Permit including the requirements to additional monitoring, updated benchmark thresholds and monitoring schedules, monitoring of impaired waters, and specific additional monitoring depending on the industry sector. In addition, noted the overlapping requirements with the NH MS4 General Permit. For Permit Year 5, 13 letters with 13 fact sheets were distributed.

Message Date(s): Spring 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:**

The Stormwater Management Program (SWMP) was publicly reviewed at a Planning Board Meeting on March 7, 2023, and is also available on the town website at www.milford.nh.gov/stormwater-management. Documents and records relating to the permit are retained and available for 5 years to the public at town hall and/or on the website at www.milford.nh.gov/stormwater-management.

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:**

Public involvement or participation opportunities are ancillary to daily operations. Additionally, the town hosted a hazardous waste drop off during Permit Year 5, and leaves can be taken to the transfer station where they are composted.

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:

The MS4 system map is maintained under the town's GIS account. Updates are made as necessary and as staff is available. Additional information about the map or printouts of the map can be obtained from Nicole Crawford, the Town Engineer and MS4 Program Manager using the contact information provided on Page 1 of this Annual Report.

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:

5 outfalls were screened and water samples were taken during Permit Year 5. Due to staff turnover the field screening parameter worksheets are unavailable, but the test results from the water samples are included as an attachment with this submission.

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:

One of the 5 outfalls tested in Permit Year 5 showed high E.Coli results (results are attached with the submission of this report). While this location was not retested or classified as an illicit discharge in Permit Year 5, it has been retested and investigated in Permit Year 6.

Employee Training

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

The Town of Milford has incorporated discussions of the IDDE plan and protocols during regularly held staff meetings with DPW staff members.

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:

Number of inspections completed:

Number of enforcement actions taken:

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

The role of Town Engineer was filled in Spring 2023. While the town conducted site plan reviews and site inspections prior to this, they were not tracked. Creating the role of Town Engineer has allowed the town to devote the time and resources necessary to properly tracking these requirements. Between April and June 2023, 2 site plan reviews were completed, 12 site inspections were completed, and 2 memos were issued regarding required maintenance and/or corrective actions taken to repair erosion and sediment controls.

MCM5: Post-Construction Stormwater Management in New Development and Redevelopment

Ordinance or Regulatory Mechanism

Date update was completed (due in year 3): December 2022

Website of ordinance or regulatory mechanism: <https://www.milford.nh.gov/community-development/pages/ordinances-regulations>

As-built Drawings

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

Number of as-built drawings received: 0

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

Prior to filling the role of Town Engineer in Spring 2023, the receipt of any as-built drawings was not tracked. The mechanisms are now in place to actively obtain and track as-built drawings which will be reflected in Permit Year 6.

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:

The Regulation Assessment Report was completed in Permit Year 5. No changes to local regulations have been planned or made at this time. Recommendations as included in the attached report will be discussed internally with appropriate town departments and formal recommendations will be proposed and presented to the appropriate town boards or committees.

Green Infrastructure Report

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

The Regulation Assessment Report was completed in Permit Year 5. No changes to local regulations have been planned or made at this time. Recommendations as included in the attached report will be discussed internally with appropriate town departments and formal recommendations will be proposed and presented to the appropriate town boards or committees.

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.

No properties have been modified or retrofitted with BMP's to mitigate impervious area. Future projects that are currently in the conceptual or design phase for the WWTP and the library will include revisions to existing infrastructure that will include BMP's for stormwater treatment.

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:

Number of catch basins cleaned:

Total volume or mass of material removed from all catch basins:

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

Total number of catch basins:

If applicable:

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

Not applicable

Street Sweeping

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

Number of miles cleaned:

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

☒ Volume of material removed:

☐ Weight of material removed:

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:

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

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:

Some requirements such as catchment investigations, SWPPP inspections at town-owned facilities, or regulation updates were not completed during Permit Year 5 due to staffing availability at the town. The position of Town Engineer was created in 2022 and the role was filled in Spring 2023. This position will allow the town to devote the appropriate amount of time and resources to fulfilling MS4 Permit Compliance Requirements, which will be reflected in Permit Year 6.

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:

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.

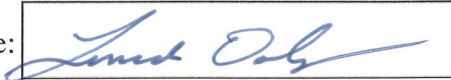
Name:

Lincoln Daley

Title:

Town Administrator

Signature:



Date:

9/28/23

[Signatory may be a duly authorized representative]