

Year 4 Annual Report
New Hampshire Small MS4 General Permit
Reporting Period: July 1, 2021 - June 30, 2022
Strafford County Complex
Non-Traditional MS-4

EPA NPDES Permit Number NHR042002

Certification of Small MS4 Year 4 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

Title

Signature Date

Primary MS4 Program Manager Contact Information:

Name: Raymond Bower Title/Position: Strafford County Administrator

Department: Not Applicable

Street Address: 259 County Farm Road

City: Dover State: New Hampshire Zip Code: 03820

Email: rbower@co.strafford.nh.us Phone Number: 603-742-1348

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, 2021 through June 30, 2022** 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 Strafford County Complex's Stormwater Management Plan (SWMP) and Illicit Discharge Detection and Elimination Plan (IDDE). Those documents and other pertinent Year 4 information can be found in submission or at the following websites, and will be referred to throughout this report:

SWMP: <https://co.strafford.nh.us/country-information/stormwater-management-program>

Date SWMP was Last Updated: 2022

IDDE Program Plan: <https://co.strafford.nh.us/country-information/stormwater-management-program>

SSO Inventory: Not Applicable

Dry Weather Screening Data: Not Applicable - Dry weather screening was completed in Year 2

Inventory and Ranking of Outfalls/Interconnections: See attached submission

Wet Weather Screening Data: Not Applicable – will begin in Year 5

Catchment Investigation Data: Not Applicable – will begin in Year 5

Illicit Discharge Removal Report: NA

Salt Reduction Plan: NA

Nitrogen Source Identification Report: NA

Phosphorus Source Identification Report: NA

Chloride Reduction Plan: NA

Results from additional stormwater or receiving water quality monitoring reports or studies:
Not Applicable

Self-Assessment

Select the impairment(s) and/or TMDL(s) that are applicable to your MS4. Make sure you are referring to the 2018 EPA approved Section 303(d) Impaired Waters List which was used for the Year 4 reporting period and can be found here:

<https://www.des.nh.gov/sites/g/files/ehbemt341/files/documents/2020-01/2018-epa-approval-20200225.pdf>.

All **Appendix F and H requirements** can be found under “Appendix F and H: Water Quality Limited Waters & TMDLs” section of this report.

Impairment(s)		
<input type="checkbox"/> Bacteria/Pathogens	<input type="checkbox"/> Chloride	<input type="checkbox"/> Nitrogen
<input type="checkbox"/> Phosphorus	<input type="checkbox"/> Solids/ Oil/ Grease (Hydrocarbons)/ Metals	
TMDL(s)		
<input checked="" type="checkbox"/> Bacteria and Pathogens	<input type="checkbox"/> Chloride	<input type="checkbox"/> Lake and Pond Phosphorus

Receiving Waters/Impaired Waters/TMDL

Have you made any changes to your lists of receiving waters, outfalls, or impairments since the NOI was submitted?

Yes

The Strafford County Complex has made changes to the list of receiving waters, outfalls, or impairments since the NOI submission. The following impairments and/or TMDLs have been added or delisted:

Water Quality Impaired Waters: Not Applicable

TMDL: Not Applicable

No

The Strafford County Complex has not made changes to the list of receiving waters, outfalls, or impairments since the NOI submission.

Describe progress made on any **incomplete requirements** listed above or optionally provide any additional relevant details, in the box below: Not Applicable.

Minimum Control Measures

MCM 1: Public Education

Total number of all MS4 related educational efforts completed *during this reporting period*: 3

In addition to the BMPs identified below, the Strafford County Complex coordinates outreach and education initiatives with the City of Dover. The Strafford County Complex also provided a link to the NH Stormwater Coalition website that includes additional BMP documents.

1-BMP: Pet Waste Disposal

Outreach Resources:

<http://www.dover.nh.gov/government/city-operations/community-services/environmental/pet-waste/index.html>

Description:

A link to the City of Dover's Pet Waste initiative is posted on the Strafford County's website. The initiative provides information as to why pet waste is a problem and recommendations for how to manage pet waste.

Targeted Audience:

Residents - Pet Owners

Responsible Department/ Parties:

Strafford County Complex

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. If pledges are signed, there will be an increase of dog owners committed to picking up pet waste.

Approximately 2,000 website views *during this reporting period*.

Goal was achieved.

Message Date: Year-round message via the Strafford County Stormwater Management website.

2-BMP: Septic System Maintenance

Outreach Resources:

<https://www.co.trafford.nh.us/country-information/stormwater-management-program>

Description:

Strafford County Stormwater Management website link to brochure to educate 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).

Targeted Audience:

Septic System Owners

Responsible Department/ Parties:

Strafford County Complex

Measurable Goal(s):

Residents are aware of water quality impacts from septic systems, the importance of maintaining septic systems and how to maintain them.

2,000 website views *during this reporting period*

Goal was achieved.

Message Date: Year-round message via the Strafford County Stormwater Management website.

3-BMP: Stormwater Management for Homeowners

Outreach Resources:

<https://www.co.trafford.nh.us/country-information/stormwater-management-program>

Description:

A “Stormwater Management Program” link on the County website offers relevant information for homeowners about responsible clean water stewardship and BMPs.

Targeted Audience:

County residents and public in general.

Responsible Department/ Parties:

Strafford County Complex

Measurable Goal(s):

The County Stormwater Management website typically receives over 2,000 visitors a year

indicating this information had a significant reach throughout the local community.

2,000 website views *during this reporting period*

Goal was achieved.

Message Date: Year-round message via the Strafford County Stormwater Management website.

BMP: Construction/Developers Outreach – Not Applicable

Describe progress made on any **incomplete requirements** listed above **or** optionally provide any additional relevant details, in the box below: Not Applicable

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 Strafford County Complex SWMP.
- Kept records relating to the permit available for 5 years and made available to the public

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

Description: The Stormwater Management Program (SWMP) was publicly reviewed and available to the public on the Strafford County Complex website. Documents and records relating to the permit are retained and available for 5 years to the public on the Strafford County Complex website.

Measurable Goal(s):

Input was received and records are maintained. **Goal was achieved.**

Public involvement or participation opportunities are ancillary to daily operations.

Describe progress made on any **incomplete requirements** listed above or optionally provide any additional relevant details, in the box below: Not Applicable

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.

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

Number of SSO's identified **during this reporting period:** Not Applicable

Number of SSO's removed **during this reporting period:** Not Applicable

MS4 System Mapping

- Updated system map due in Year 2 as necessary:

Provide additional status information regarding your map:

Map of storm sewer system and associated outfalls was completed in Year 2 and there have been no updates since that time.

Screening of Outfalls/Interconnections

- No outfalls were inspected for dry weather screening **during this report period**. Dry weather investigations/screening was completed in Year 2.
- Dry weather outfall screening data can be found in submission.

Dry Weather Screening

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

Percent of total known outfalls screened to date **during this reporting period:** 100%

The inventory and ranking of outfalls/interconnections was not updated during Year 4 because outfalls/interconnections were not inspected.

Wet Weather Screening

No outfalls were inspected for wet weather screening **during this report period**. Wet weather screening will occur in Year 5.

Wet weather outfall screening data can be found in submission.

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

Percent of total outfalls screened to date **during this reporting period**: 0%

Catchment Investigations

No catchment investigations were conducted **during this report period**.

Catchment investigation data can be found in submission.

Number of catchment investigations **during this reporting period**: 0

Percentage of total catchments investigated to date (Years 1 - Year 4): 0%

IDDE Progress

No illicit discharges were found **during this reporting period**.

The illicit discharges removal report can be found in submission **AND/OR** found at the following website.

Number of illicit discharges identified **during this reporting period**: 0

Number of illicit discharges removed **during this reporting period**: 0

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

Total number of illicit discharges identified since the effective date of the permit (July 1, 2018): 0

Employee Training

Provided training to employees involved in IDDE program **during the reporting period**:
Materials and training, including information on how to identify illicit discharges, are available to applicable employees in accordance with IDDE plan. A training module was prepared in Permit Year 4 and reviewed by the stormwater team.

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

Catchment Investigations will begin in Year 5. Brush and trash debris in and around the detention pond was removed in Year 4. In June 2022, the Strafford County Complex performed maintenance in and around the Cocheco River including removing sticks, logs, and trash debris.

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*: NA

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

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

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

- The Strafford County Complex has regulatory mechanism consistent with permit requirements 2.3.6.a.i.

A Post-Construction Ordinance, consistent with the permit requirements, has been adopted by the City of Dover prior to July 1st 2021.

As-built Drawings

Number of as-built drawings received *during this reporting period*: 0

Retrofit Properties Inventory

- Non-traditional MS4s do not need to meet the requirements of Part 2.3.6.c and Part 2.3.6.d; therefore, the following questions are not applicable. The Strafford County Complex evaluated opportunities to include green infrastructure practices in new development and redevelopment at their facilities and to reduce the amount of impervious cover due to parking areas and walkways. New development and/or redevelopment opportunities were not applicable in Year 4 and will be considered in the future. At this time, reductions in impervious cover were not available.
- Identified permittee-owned properties that could potentially be modified or retrofitted with BMPs to reduce impervious cover – Not Applicable
- Developed a report assessing current street design and parking lot guidelines and other local requirements within the municipality that affect the creation of impervious cover, made it available as part of the SWMP, and:
 - No updates were recommended.
 - Updates were recommended. The anticipated date or date of completion for updates is not applicable.
- Developed a report assessing local regulations to determine the feasibility of making green infrastructure practices allowable when appropriate site conditions exist, made it available as part

of the SWMP, and:

No updates were recommended.

Updates were recommended. The anticipated date or date of completion for updates is not applicable.

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

- Properly 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: Not Applicable

Number of catch basins inspected **during this reporting period**: 38

Number of catch basins cleaned **during this reporting period**: 0

Total volume or mass of material removed from all catch basins **during this reporting period**: Catch basins were cleaned out in 2020. During the inspection in 2022, materials in catch basins was not sufficient to remove.

Total number of catch basins within the MS4 system: 38

Report on the actions taken if a catch basin sump is more than 50% full during two consecutive routine inspections/cleaning events: Not Applicable

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.

Street Sweeping

- Properly stored and disposed of street sweepings so they did not discharge to receiving waters
- All curbed roadways were swept at least once within the reporting period

Number of (lane) miles swept **during this reporting period**: approximately 1 mile

Volume of swept material **during this reporting period**: quantity not provided

Stormwater Pollution Prevention Plan (SWPPP)

- Implemented SWPPPs for all permittee owned or operated maintenance garages, public works yards, transfer stations, and other waste handling facilities

Number of site inspections completed for **during this reporting period**: 12

Number of corrective actions taken *during this reporting period*: 9

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

Trash and debris were removed from drainage swales at the Facility.

Operations and Maintenance (O & M) Programs

- O&M programs for all permittee owned facilities have been completed and/or updated as noted below:

- Implemented all maintenance procedures for permittee owned facilities in accordance with O&M programs

- Updated inventory of all permittee owned facilities as necessary
All permittee owned facilities, including an inventory, are included in our SWMP. There were no changes to report during Year 4.

- 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: Not Applicable

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**
- Non-Traditional MS4 Not Applicable** – 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
- Updated Salt Reduction Plan as necessary **during this reporting period** and can be found in submission.

Describe progress made on any **incomplete requirements** listed above or optionally provide any additional relevant details, in the box below: Not Applicable

Nitrogen Impairment (Appendix H)

- Permittee does not have a nitrogen 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**

Nitrogen Source Identification Report

- The Nitrogen Source Identification Report can be found in submission.

Potential Structural BMPs

The tracking and accounting elements associated with the NH MS4 permit are ongoing, adaptive and are consistent with Attachment 3 of Appendix F of the permit. Currently there is emergent utilization of a new database tracking system called the Pollutant Tracing and Accounting Program (PTAP) supported by NHDES and a select number of municipalities. Coalition communities understand the importance of this effort and are committed to continuing to work towards better tracking and accounting strategies for both structural and non-structural BMPs. PTAP theoretically has limitless expansion capacity in the region and is already integrated with the EPA Region 1 supported BMP Accounting and Tracking Tool (BATT). This emerging collaboration will be a large component of future implementation efforts. While BMP tracking and accounting programs are not fully functional, these integrated planning tools provide a comprehensive solution to successful tracking and accounting metrics now and moving forward in the future.

Describe progress made on any **incomplete requirements** listed above or optionally provide any additional relevant details, in the box below: Not Applicable

Phosphorus Impairment (Appendix H)

- Permittee does not have a phosphorus impairment
- 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**

Phosphorus Source Identification Report

- The Phosphorus Source Identification Report can be found in submission.

Potential Structural BMPs

The tracking and accounting elements associated with the NH MS4 permit are ongoing, adaptive and are consistent with Attachment 3 of Appendix F of the permit. Currently there is emergent utilization of a new database tracking system called the Pollutant Tracing and Accounting Program (PTAP) supported by NHDES and a select number of municipalities. Coalition communities understand the importance of this effort and are committed to continuing to work towards better tracking and accounting strategies for both structural and non-structural BMPs. PTAP theoretically has limitless expansion capacity in the region and is already integrated with the EPA Region 1 supported BMP Accounting and Tracking Tool (BATT). This emerging collaboration will be a large component of future implementation efforts. While BMP tracking and accounting programs are not fully functional, these integrated planning tools provide a comprehensive solution to successful tracking and accounting metrics now and moving forward in the future.

Describe progress made on any **incomplete requirements** listed above **or** optionally provide any additional relevant details, in the box below: Not Applicable

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

- Permittee does not have a solids, oil and grease, or metals impairment(s)
- 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**

Describe progress made on any **incomplete requirements** listed above **or** optionally provide any additional relevant details, in the box below: Not Applicable

Chloride TMDL (Appendix F)

- Permittee does not have a chloride TMDL
- Updated Chloride Reduction Plan as necessary **during this reporting period** and can be found in submission.

Describe progress made on any **incomplete requirements** listed above or optionally provide any additional relevant details, in the box below: Not Applicable

Lake and Pond Phosphorus TMDL (Appendix F)

- Permittee does not have a lake and pond phosphorus TMDL
- Calculated baseline phosphorus, allowable phosphorus load, and phosphorus reduction requirement **during this reporting period**
- Defined the scope of the Lake Phosphorus Control Plan (LPCP).

The PCP scope is the urbanized area portion of our jurisdiction discharging to the impaired Waterbody **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

Additional Required Information

Monitoring or Study Results

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

Not applicable

The results from additional reports or studies are in submission.

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: Not Applicable

Description of Any Changes in Identified BMPs or Measurable Goals

The Strafford County Complex has implemented activities in accordance with the permit and outlined in the SWMP. BMPs and measurable goals outlined in the SWMP are appropriate.

COVID-19 Impacts

If any of the above Year 4 requirements could not be completed **during this reporting period** due to the impacts of COVID-19, please identify the requirement(s) that could not be completed, any actions taken to attempt to complete the requirement, and reason the requirement could not be completed below: Not Applicable

Activities Planned for Next Reporting Period

The Strafford County Complex will continue to implement activities in accordance with the permit and SWMP.