BEDFORD PUBLIC WORKS

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Date: April 29, 2005

United States Environmental Protection Agency
Water Technical Unit
PO Box 8127
Boston, MA 02114

RE: NPDES Phase II Permit Number NHR041036 – Annual Update

To whom it may concern:

Included herewith, please find the Town of Bedford's annual update as required under the NPDES Storm Water Program.

Sincerely,

James B. Stanford, P.E.
Director of Public Works

Municipality/Organization: **Town of Bedford, NH**

EPA NPDES Permit Number: **NHR041036**

MaDEP Transmittal Number: **N/A**

Annual Report Number & Reporting Period: **No. 2: March 04-March 05**

NPDES PII Small MS4 General Permit Annual Report

Part I. General Information

Contact Person: James Stanford, P.E. Title: Director of Public Works

Telephone #: (603) 472-3070 Email: jstanford@ci.bedford.nh.us

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, 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.

Signature:

Printed Name: James Stanford

Title: Director of Public Works

Date: 4-29-05

Part II. Self-Assessment

The Town of Bedford, NH has completed the required self-assessment and has determined that our municipality is in compliance with all permit conditions, except for the following provisions:

Part I.B.2(e)(vi) The Town of Bedford, NH permit eligibility with regard to the Endangered Species Act was pending at the time of our NOI submission. At this point the Town has not completed our town-wide system mapping and this item is still pending.

Part III. Summary of Minimum Control Measures

1. Public Education and Outreach

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 2 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 3
1-1	Maintain storm water Info and links on Town of Bedford website	DPW/ J. Stanford	Review and update each year; add reference links to NHDES storm water site	The Town of Bedford has just launched a new website and will be adding the links to the Public Works webpage.	Additional info on Group Meetings will be incorporated into the site
Revised					
1-2	Publish info on storm water program and practices in local newspapers	DPW/ J. Stanford	Publish articles each year in town bulletin and local newspapers	Publication was not sent due to budget cuts.	Will implement similar topics to be broadcast as information on the Public Access channel. See additions BMP 1-4
Revised			Town Bulletin has been eliminated because of budget cuts		
1-3	Broadcast Public meetings (see BMP 2-2)	DPW/ J. Stanford	1 meeting per year	No meetings were held. The group has made progress towards developing program format.	Broadcast meeting annually
Revised					
Revised					

1a. Additions

1-4	Broadcast various programs on storm water topics	DPW/ J. Stanford	At least 1 program per year (run several times per program week)	Broadcast program – general discussion of runoff	Continue with broadcast

2. Public Involvement and Participation

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 2 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 3
2-1	Conduct public meetings on storm water program and solicit public feedback	DPW/ J. Stanford	Conduct 4 meetings over the 5-year permit term	Worked on developing a program among the communities within our storm water group.	Conduct first meeting
Revised					
2-2	Establish a storm water management group to oversee the storm water management program	DPW/ J. Stanford	Establish group of volunteers during the first 2 years – include residents on group	The Storm Storm water group has been established with several other communities in Southern NH. We met once every two months to discuss storm water issues and share ideas on the program.	Continue participation in group activities
Revised			Residents have not been included in the group as of yet		
Revised					
Revised					

2a. Additions

2-3	Purchase hybrid vehicles	DPW/ J. Stanford	Replace old gas vehicles with new electric hybrids	Purchased 6 vehicles as replacement for old police cruisers used by town staff. Discussion of hybrid vehicles discussed at public meeting.	Continue maintenance of vehicles
2-4	Help with local groups in trash pick-up program	DPW/P. Belanger	Provide bags and pickup of trash for town clean-up days	Provided bags and trash pick-up during 1 clean-up day.	Continue with participation with local groups.

3. Illicit Discharge Detection and Elimination

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 2 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 3
3-1	Map storm water drainage system and outfalls	DPW/ J. Stanford	Complete mapping by end of 5 year permit term	Continued to collect all existing map data on drainage systems. Contract to have aerial mapping will be completed this summer.	Base mapping will be completed by this Fall. Further ground survey work will continue into next year.
Revised					
3-2	Maintain map database on GIS system	DPW/ J. Stanford	Complete with system mapping (BMP 3-1)	System data collection continued this past year.	Maintenance will be ongoing as data is received
Revised					
3-3	Visually inspect outfalls for dry weather flows	DPW/P. Belanger	Inspect a representative number of outfalls each year. Complete inspection of all outfalls by the end of 5 year permit term	DPW continued to inspect outfalls this past year. To date we have only detected 1 illicit connection to a Town catch basin. The connection was eliminated	Continue with Inventory and perform inspections.
Revised					
3-4	Implement a sampling and analysis program for dry weather flows	DPW/ J. Stanford	Sample any outfalls identified with dry weather flows under BMP 3-3 above. Complete sampling at identified outfalls as budget permits	The only connection discovered did not require testing because there were no flows at the time of inspection. Once the connection was discovered it was fully disconnected.	Continue to monitor outfalls and test any flows that are detected.
Revised					
3-5	Train DPW personnel to recognize illicit discharge	DPW/P. Belanger	Annual training to include information on recognizing and reducing illicit discharges	Conducted 1 day of training for Public Works employees.	Continue training with additional storm water topics.
Revised			Training to begin in summer 2004		
3-6	Review and update Town bylaws and regulations to include illicit discharge ordinance	DPW/ J. Stanford	Years 1 and 2 – review existing ordinances	Continued review of existing ordinances.	Discuss with Planning Board changes to existing storm water regulations.
Revised					

3a. Additions - None

4. Construction Site Stormwater Runoff Control

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 2 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 3
4-1	Storm water impact and design review process	Planning Board/K. White	Continue current new-construction review process involving all appropriate departments	Reviewed new subdivision and site plans for storm water impact. Requested major and minor design changes to control development storm water discharge.	Continue design review process
Revised					
4-2	Visually inspect construction sites for proper erosion control measures	Planning Board/K. White	Continue to inspect sites, record inspections and track violations	Inspected construction sites. Submitted deficiency reports to owners and contractors who were in violation of design storm water control measures.	Continue with inspection process
Revised					
4-3	Construction Site Runoff Control	Planning Board/J. Stanford	Review existing regulations to require sediment and erosion control measures on construction sites	Existing regulations are in place. Developed process whereby developments were not allowed to proceed with construction until control measures were satisfactorily in place.	Continue with updating regulations/policies as needed.
Revised					
Revised					
Revised					
Revised					

4a. Additions - None

5. Post-Construction Stormwater Management in New Development and Redevelopment

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 2 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 3
5-1	Conduct storm water impact and design review process (in conjunction with BMP 4-1)	Planning Board/K. White	Continue current review process involving all appropriate departments	This past year implemented a design review meeting made up of Town Personnel. Meetings were held every two weeks.	Continue review process
Revised					
5-2	Review and update Town bylaws and regulations regarding post construction storm water management provisions	Planning Board/K. White	Years 1 and 2 – review existing ordinances	Continued review of existing regulations.	Propose minor changes to the regulations.
Revised					
Revised					
Revised					
Revised					
Revised					

5a. Additions - None

6. Pollution Prevention and Good Housekeeping in Municipal Operations

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 2 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 3
6-1	Street Sweeping	DPW/P. Belanger	Continue to sweep selected streets annually and increase frequency of sweeping as budget allows	Swept approximately 20% of Town Owned streets.	Continue with program
Revised			Maintain volume records of material collected.		
6-2	Catch Basin cleaning	DPW/P. Belanger	Continue to clean catch basins annually and as needed in areas of high flooding.	Performed catch basin cleaning on ¾ of town-owned catch basins. Also performed street swale maintenance and cleaning.	Continue with program
Revised			Maintain volume records of material cleaned from catch basins and swales.		
6-3	Collect household hazardous waste	DPW/S. Crean	Continue hazardous waste collection days at the transfer station	Conducted 1 hazardous Waste collection day at the Town Transfer Station.	Conduct 1 household hazardous waste collection day – Scheduled for May 2005
Revised			Funding will only allow conducting 1 special collection day this year		
6-4	Collect yard waste	DPW/S. Crean	Continue yard waste drop off at transfer station	Yard waste drop off was in operation throughout the year	Continue with drop off program
Revised					
6-5	Maintain the storm water management program	DPW/J. Stanford	Maintain written program summary; update as necessary; submit reports annually in accordance with the permit	Tracked annual performance. Completed annual update in compliance with Permit.	Continue with tracking and compliance.
Revised					
6-6	Implement Storm Water Pollution Prevention Plan for DPW garage and transfer station	DPW/ J. Stanford	Maintain plan at each facility	Continued review of existing plans	Update plan as necessary
Revised					

6-7	Develop and implement training program for proper installation of erosion control barriers	DPW/ J. Stanford	Review existing procedures	Discussed program with Highway Superintendent.	Include training materials with our program outlined in BMP 3-5

6a. Additions

6-8	Constructed new shed for storage of road salt	DPW/ J. Stanford	Reduce amount of salt that is washed off-site.	Constructed new shed.	Conduct all loading and unloading operation under cover of new shed.

7. BMPs for Meeting Total Maximum Daily Load (TMDL) Waste Load Allocations (WLA) *<<if applicable>>*

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 2 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 3
7-1	Monitor and sample discharges to impaired water ways	DPW/ J. Stanford	Monitor discharges and collect samples of discharges to impaired waters as budget allows	No samples were collected or monitored this past year.	We are working with a neighboring community to develop monitoring program for shared water resources.
Revised					
Revised					
Revised					

7a. Additions - None

7b. WLA Assessment

Determination of discharges to impaired waters has not been completed as of yet. Upon completion of outfall mapping, determinations will be made.

Part IV. Summary of Information Collected and Analyzed

Our program is closer to completing our system mapping and will most likely be completed ahead of schedule. The program continues to benefit by our participation in the storm water group created with other southern New Hampshire communities. The group meets regularly to discuss progress and share resources.

Part V. Program Outputs & Accomplishments (OPTIONAL)

Programmatic

Stormwater management position created/staffed	(y/n)	no
Annual program budget/expenditures	($)	$1,000
amount represents outside consulting help and does not reflect actual implementation of programs		

Education, Involvement, and Training

Estimated number of residents reached by education program(s)	(# or %)	8 %
Stormwater management committee established	(y/n)	yes
Stream teams established or supported	(# or y/n)	no
Shoreline clean-up participation or quantity of shoreline miles cleaned	(y/n or mi.)	N/A
Household Hazardous Waste Collection Days		
▪ days sponsored	(#)	1 day
▪ community participation	(%)	5 %
▪ material collected	(tons or gal)	2500 Gal
School curricula implemented	(y/n)	no

Legal/Regulatory

	In Place Prior to Phase II	Under Review	Drafted	Adopted
Regulatory Mechanism Status (indicate with "**X**")				
▪ Illicit Discharge Detection & Elimination		X		
▪ Erosion & Sediment Control	X			
▪ Post-Development Stormwater Management		X		

Accompanying Regulation Status (indicate with "**X**")				
▪ Illicit Discharge Detection & Elimination		X		
▪ Erosion & Sediment Control	X			
▪ Post-Development Stormwater Management		X		

Mapping and Illicit Discharges

Outfall mapping complete	(%)	40%
Estimated or actual number of outfalls	(#)	unknown
System-Wide mapping complete	(%)	40%
Mapping method(s)		
▪ Paper/Mylar	(%)	10%
▪ CADD	(%)	10%
▪ GIS	(%)	80%
Outfalls inspected/screened	(# or %)	20%
Illicit discharges identified	(#)	1
Illicit connections removed	(#) (est. gpd)	1
% of population on sewer	(%)	10%
% of population on septic systems	(%)	90%

Construction

Number of construction starts (>1-acre)	(#)	5
Estimated percentage of construction starts adequately regulated for erosion and sediment control	(%)	100%
Site inspections completed	(# or %)	100%
Tickets/Stop work orders issued	(# or %)	2
Fines collected	(# and $)	0
Complaints/concerns received from public	(#)	3

Post-Development Stormwater Management

Estimated percentage of development/redevelopment projects adequately regulated for post-construction stormwater control	(%)	30%
Site inspections completed	(# or %)	90%
Estimated volume of stormwater recharged	(gpy)	unknown
Public Works Director has regularly requested engineers to implement recharge into their designs		

Operations and Maintenance

Average frequency of catch basin cleaning (non-commercial/non-arterial streets)	(times/yr)	1
Average frequency of catch basin cleaning (commercial/arterial or other critical streets)	(times/yr)	2
Total number of structures cleaned	(#)	83
Storm drain cleaned	(LF or mi.)	250 lf
Qty. of screenings/debris removed from storm sewer infrastructure	(lbs. or tons)	unknown
Disposal or use of sweepings (landfill, POTW, compost, recycle for sand, beneficial use, etc.)		recycle
Cost of screenings disposal	($)	10,000

Average frequency of street sweeping (non-commercial/non-arterial streets)	(times/yr)	1/year
Average frequency of street sweeping (commercial/arterial or other critical streets)	(times/yr)	4/year
Qty. of sand/debris collected by sweeping	(lbs. or tons)	250 yards
Disposal of sweepings (landfill, POTW, compost, beneficial use, etc.)	(location)	recycle
Cost of sweepings disposal	($)	unknown
Vacuum street sweepers purchased/leased	(#)	0
Vacuum street sweepers specified in contracts	(y/n)	no

Reduction in application on public land of: ("N/A" = never used; "100%" = elimination)		
▪ Fertilizers	(lbs. or %)	unknown
▪ Herbicides	(lbs. or %)	unknown
▪ Pesticides	(lbs. or %)	unknown

Anti-/De-Icing products and ratios *The Town uses mostly sand however we will use a sand/salt mixture in our winter operations when conditions necessitate (we use a 4:1 ratio of sand to salt).*	% NaCl % $CaCl_2$ % $MgCl_2$ % CMA % Kac % KCl % Sand	40 % 0% 0% 0% 0% 0% 60 %
Pre-wetting techniques utilized	(y/n)	no
Manual control spreaders used	(y/n)	yes
Automatic or Zero-velocity spreaders used	(y/n)	yes
Estimated net reduction in typical year salt application	(lbs. or %)	unknown
Salt pile(s) covered in storage shed(s)	(y/n)	yes
Storage shed(s) in design or under construction – *funding for new shed appropriated*	(y/n)	yes