TOWN OF HUDSON

COMMUNITY DEVELOPMENT DEPARTMENT

12 School Street Hudson, New Hampshire 03051
Community Development Department 603-886-6005 • Engineering Division 603-886-6008 • Fax 603-594-1142

April 18, 2005

Ms. Thelma Murphy
U.S. Environmental Program Agency
Water Technical Unit
P.O. Box 8127
Boston, MA 02114

RE: MS4 – Annual Report for Town of Hudson, NH
Permit No. NHR041013

Attn: Thelma Murphy – Stormwater Coordinator

Enclosed is the annual report for May 1, 2005 Town of Hudson, NH.

Please note the changes to the BMP's are scheduled in the report. We continue to make minor adjustments to be more realistic but are still on schedule for the 5-year implementation.

Very truly yours,

Kenneth Massey, Chairman
Board of Selectmen

Pc: NHDES
Steve Malizia, Town Administrator
Sean Sullivan, Community Development Director
Kevin Burns, Road Agent
John Cashell, Town Planner

Recycled Paper

NPDES - STORMWATER II

ANNUAL REPORT

MAY 1, 2005

(For work efforts through April 1, 2005)

I. PERMIT NUMBER NHR041013

II. SIGNIFICANT CHANGES TO THE N.O.I. ARE AS FOLLOWS:

BMP 3-1 Illicit discharge detention & elimination

Our first year effort under contract to the NRPC had limited success. Our initial program was to be the first year of a five-year program to map our entire drainage system(s). Our contractor fell well short of meeting our expected first year goal.

Therefore we are now concentrating on outfalls and receiving water only. With assistance of our Highway Department and possibly some assistance of NRPC we will renew our efforts to map and catalog our outfalls.

Potential new BMP 3-6 Monitor Ottarnic Pond.

Ottarnic Pond has developed a protection association because of a strong milfoil infestation. We expect that this may expand into an overall water quality-monitoring program and we will coordinate with these volunteers if it does.

BMP 5-1 Continue to allow "Open Space Development".

Attempts to improve on "the Open Space development ordinance" have been unsuccessful, and will not be reinitiated in the next year.

The Conservation Commission however has formed an Open Space Committee, which is pursuing the preservation of open space.

III. OTHER NOTABLES:

The Town Engineer, Community Development Director, and Town Planner continue to be involved with the Regional Stormwater group. This meets at NRPC typically once every two months.

Although the number of available Stormwater seminars has decreased from the first year of the program. The Towns staff representation at seminars has been very good. The Town Administrator, Community Development Director, Town Planner, Road Agent, Highway Supervisor, and the Town Engineer attended the most recent seminar in January of 2005.

IV STATUS OF BMPS

Task 1. Public Education

BMP 1-1: Install & maintain two educational Kiosk's.

Responsible person(s)	Town Engineer.
Measurable goal:	Information posted and maintained/updated annually.
Status:	Two existing Kiosks one at Musquash Reserve and one at Robinson Pond boat landing are being updated annually with various stormwater information. Information is also posted at the Town Hall in three locations.
Future goals:	The above sites will be continued, with annual change outs.

BMP 1-2: Distribute Stormwater Quality & Environmental Information.

Responsible person(s):	Director of Community Development and Town Engineer.
Measurable goal(s):	Document information being distributed and schedule of distribution.

Status:	Two videos have been obtained one from NHDES and one from EPA. These were shown on cable TV, local access during two periods over the last year. 5,000 trifolds have been prepared for us. These contain simple "do's and don'ts". These are provided as handouts at the Town Highway Department and at three locations in the Town Hall. A Separate trifold with "do's and don'ts" of water conservation is being mailed out in monthly water bills. There are 5,100 water users. This is scheduled for the April 2005 billing cycle
Future goal(s):	Continue to promote trifold information at existing sites. Continue to show videos on local access TV two times per year. Work with the cable TV to include other information we have had produced on posters.

BMP 1-3: <u>Add Stormwater Quality Information to web page.</u>

Responsible person(s):	Director of Community Development.
Measurable goal:	Document articles/information put on web page.
Status:	Web page section for stormwater program was developed and included on Town web pages this year.
Future goal:	Web page will be reviewed annually and updated as appropriate.

BMP 1-4: <u>Include Stormwater Quality Information in the Annual Town report.</u>

Responsible person(s):	Director of Community Development
Measurable goal(s):	Provide two articles.

Status:	The Stormwater program is briefly explained in the Engineering section of the Town annual report. The Town Annual Report however has not had a separate feature report.
Future goal(s):	To place a feature sectioning in the Annual Town Report.

BMP 1-5: Provide educational information for residents around Robinson Pond.

Responsible person (s):	Friends of Hudson Natural Resources/Robinson Pond Improvement Council.
Measurable goal(s):	Distribute information to residence and maintain Robinson Pond kiosk.
Status:	This program has been ongoing since 2001 as part of the "Robinson Pond nonpoint implementation project" (also see BMP 3-5) This program is funded through grants from the NHDES "small outreach and education grants program".
Future goal(s):	Continue program. Copies of files are kept at the Engineering office.

BMP 1-6: "Implement Stormwater Committee"

Responsible person(s):	Town Engineer, Community Development Director, Town Planner, Town Engineering Inspector, Road Agent and Sewer and Drain Supervisor.
Measurable goal(s):	Meet monthly in 2005 and at least bi-monthly thereafter. To plan and evaluate BMP implementations.

Status:	Committee made up of staff noted above was officially authorized by the Board of Selectmen. Committee meets monthly. Meeting minutes are on file with the Stormwater files.
Future goal(s):	To continue meetings for the foreseeable future.

Task –2 **Public Participation**

BMP 2-1: <u>Hold Seven Hazardous Waste Collection Days at Nashua DPW, and Continue waste Oil Program. (Now 5-days)</u>

Responsible Person(s)	Road Agent
Measurable goal(s):	Hazardous waste collection days are held Annually with drop-off located at the Nashua DPW garage. Waste oil drop off is available at the Highway Garage during regular business hours (7:00am to 3:00pm).
Status:	Hazardous waste collection days were held on The first Saturday of each month, April through November excluding July 2004. The Town of Hudson's local cable TV showed an announcement prior to each date. These dates were also announced through an informational mailing, published by the Town of Hudson Highway Department. The summary of regional collection participation by Towns is on file.
Future Goal(s):	Five collection days have been scheduled by the NRPC for 2005. These are May 7th, June 2nd, August 6th, October 1st, and November 5th. The change in the number of collection days is the result of grant funding reduction.

BMP 2-2: The Town cleanup days, leaves, brush, building materials, scrap metal collect at West Road site.

Responsible person(s):	Road Agent
Measurable goal(s):	Eight cleanup days.
Status:	In the same Hudson Highway Department Mailing noted for BMP-2-1 above the Town cleanup days are published. This mailing goes out to all Town residents. 8-days are scheduled.
Future goal(s):	Collection has been ongoing for many years and will continue. Mailing notice is updated each year.

BMP 2-3: Provide a hotline for public comments & illicit discharge complaints.

Responsible person(s):	Director of Community Development
Measurable goal(s):	Maintain web page and telephone hot line.
Status:	Hotline has been set up and noticed in the Web page. A telephone number is also advertised. A complaint/action form is kept on file at the Community Development office.
Future goal(s):	Maintain "Hotline" number. Maintain complaint/action form at Community Development office. Advertise periodically on cable TV.

BMP 2-4: Continue curbside recycling collection Program.

Responsible person(s):	Road Agent.
Measurable goal(s):	Recycling collected

Status:	Hudson utilizes curbside trash collection and recycling collections. This continues weekly. The Hudson Highway Department keeps an ongoing log of collections. Copies of these are included in the Stormwater files.

BMP 2-5: Continue to follow public notification guidelines.

Responsible person(s):	Director of Community Development
Measurable goal(s):	Guidelines followed.
Status:	Hudson follows a standard public notification process of Town committee meetings and public activities. These are published on bulletin boards and are also posted on the Town web site calendar agendas for meetings.
Future goal(s):	To continue notification activities.

BMP 2-6: Solicit public comment on annual report.

Responsible person(s):	Director of Community Development
Measurable goal(s):	Annual reports summarized and available for Public comment. Number of comments received.
Status:	No comments locally have been received.
Future goal(s):	This annual report will be kept on file for local public viewing at the Community Development office. It's existence and location will be identified on the web page and public viewing and comments will be invited.

Task 3 – Illicit discharge detection and elimination.

BMP 3-1: Map outfalls and receiving waters.

Responsible person(s): Town Engineer

Measurable goal(s): By end of 5-year permit term outfall mapping to Be completed.

Status: Our first year contract with NRPC to map our drainage system had limited success. Therefore we are changing direction somewhat. Using our GIS the engineering office is working with the Highway Department to locate all outfalls. We will then either purchasing our own GPS to locate the outfalls or outsourcing to do the same. A hard copy description of each outfall will be prepared and placed in our files. A standard form has been developed.

Future goal(s): Outfalls will be identified and located over the Next three-years. Outfalls will be identified by Unique number and cataloged.

Watershed maps will be cross-referenced to the outfall cataloging.

BMP 3-2: Develop effective storm sewer bylaws.

Responsible person(s): Director of Community Development & Town Engineer

Measurable goal: Bylaws developed and presented to Selectmen.

Status: A draft of the proposed bylaws was provided at our March Stormwater committee meeting by our consultant.

Future goal(s): Review bylaws as drafted. Establish a review and hearing for their acceptance. Adopt bylaws by summer of 2006.

BMP 3-3: Dry weather screening of outfalls.

Responsible person(s): Town Engineer

Measurable goal(s): Number of outfalls screened.

Status: Outfalls are being located. (See BMP.3-1 above). As part of this an inspection (with digital archive) is being done. This will be the initial visual screening..

There are two 303d impaired water bodies in Hudson. Ottarnic Pond and Merrimack River below Nashua River. Outfalls into these will receive priority attention.

Ottanic Pond is scheduled to be treated for Milfoil contamination this summer 2005. This is a new effort being undertaken by a volunteer group. This effort is being endorsed by the Town with some of the initial funding through the Conservation Commission. We will be investigating ways to work with these volunteers to best protect Ottarnic Pond.

Future goal(s): Outfall inspections (visual) will begin summer 2005; We hope to inspect all outfalls every three-years.

The Merrimack River is annually tested for water quality by lower Merrimack River Local Advisory Committee we received copies of their reports that are also on file at NRPC.

BMP 3-4: Develop and implement system for elimination of illicit discharges.

Responsible person(s): Town Engineer & Road Agent and Highway Supervisor.

Measurable goal(s): System developed and implemented.

Status:	Hudson has Sewer and Drain Division personnel who through visual inspection and video camera (for pipe inspection) have and will continue detection and correction of illicit discharges.
Future goal(s):	Documentation of efforts will be cataloged and expanded to include the outfalls located in BMP.3-3 above. Sewer and drains department personnel received initial training in fall of 2004 for illicit discharge detector (BMP 6-2). The hotline complaint system has also been activated (BMP 2-3).

BMP 3-5: BMP 3-5: "continue monitoring of Robinson Pond and its watershed."

Responsible person(s):	Friends of Hudson Natural Resources
Measurable goal(s):	Annual monitoring data for 11 sites along Robinson Pond and in watershed.
Status:	Monitoring has been undertaken since 2001. This is part of the "Robinson Pond nonpoint implementation project," (also see new BMP 1 -5).
Future goal(s):	To continue program, copies of annual results are kept at the Engineering office.

Control measure 4: Construction site run-off control.

BMP 4-1: <u>Independent engineering company reviewing site plans and stormwater controls.</u>

Responsible person(s):	Town Engineer & Town Planner
Measurable goal(s):	Independent review of all plans.

BMP 4-4: Receive and consider public comment.

Responsible person(s):	Director of Community Development
Measurable goal(s):	Maintain web page hotline for comments.
Status:	Hotline telephone number has been identified and advertised on Town web page (see BMP 2 -3). No comments have been received yet..
Future goal(s):	Continue to solicit comments and evaluate any ideas.

BMP 4-5: Inspect and enforce control measures at construction sites.

Responsible person(s):	Town Engineer & Engineering Inspector.
Measurable person(s):	Inspections conducted and documented.
Status:	The Town has an ongoing inspection process for subdivisions and site plans. This includes ongoing inspection of stormwater and erosion control measures with documentation maintained at the Town engineering office. During construction season inspections are typically done weekly and after each significant rain event.

This effort has been upgrade as follows:

- Reports pertinent to stormwater management and erosion control inspections have been copied to the SWPPP files.

- Digital pictures are now being taken from time to time and are used to help document problems and corrections. These are being copied to the SWPPP file.

- Copies of NOI's and Stormwater Management plans are now being requested. We are accessing the EPA website to check each sites NOI status.

Future goal(s): To continue the same effort with upgrades in effectiveness as knowledge and technology allows.

To update documentation of SWPPP with NOI's, NOT's through the EPA website.

BMP 4-6: Enforce site permits and ordinances.

Responsible person(s): Town Engineer, Engineering Inspector, Code Enforcement Officer, and Director of Community Development..

Measurable goal(s): Permits and ordinances enforced.

Status: In conjunction with BMP 4-5 permits and ordinances with respect to stormwater management erosion control and wetlands protection are continually monitored and enforced.

Pre construction meetings are required for most subdivisions and site plans. In 2003 a checklist for this meeting was developed which includes notification of the engineering department of the NOI submittal, state permits and local wetland permits.

The engineering department and/or code enforcement officer sends out code enforcement letters. Records are kept at the Community Development office. *BMP 2-3) enforcement letters and actions are being focused on wetland buffer violations and sewer permit violations and erosion control violations.

Measurable goal(s):	Draft and present bylaws in spring 2004.
Status:	Draft bylaws provided March 2005 in conjunction with BMP 3-2 & 4-2.
Future goal(s):	Review and adopt bylaws by spring 2006.

BMP 5-3: <u>Recommend a BMP manual for use by planners & developers.</u>

Responsible person(s):	Town Engineer
Measurable goal(s):	BMP manual selected
Status:	NHDES Guidebook – Stormwater Management and Erosion and Sediment Control Handbook for Urban and Developing Areas in New Hampshire has been selected.
Future goal(s):	This manual is kept in file for reference with our SWPPP.

BMP 5-4: <u>Develop Procedures for Adequate Long Term Operations of Structural BMP's and Minimization of Water Quality Impacts.</u>

Responsible person(s): Road Agent & Town Engineer

Measurable goal(s): Existing structural BMP's public and private will be cataloged:

- Maintenance goals for public structural BMP's are developed. Structural BMP's are cataloged.
- Recommend maintenance needs to private BMP owners.

Status: The cataloging of structural BMP's will be done as part of BMP 3-1 and 3-3, mapping of out falls and drainage system.

Future goal(s): Over the next three-years remaining in implementation the cataloging will be accomplished.

Municipality owned structural BMP's would be put on a maintenance cycle anticipated beginning in 2006.

Maintenance recommendations for privately owned structural BMP's will be communicated with reminders every 2-years once they are cataloged. Notes on site plans will be incorporated to help obligate private owners to follow through.

Task 6: **Good Housekeeping**

BMP 6-1: Identify sensitive receptors

Responsible person(s): Director of Community Development & Town Engineer.

Measurable goal(s): Receptors identified and mapped.

Status: Sensitive receptors are Ottarnic Pond and the Merrimack River (see BMP 2-3).

Future goal(s): Sampling by the Lower Merrimack River Local Advisory Committee continues each year for the Merrimack River (see BMP 3-3) for Ottarnic Pond.

BMP 6-2: Continue employee training program.

Responsible person(s): Road Agent

Measurable goal(s): Continue annual training for Town personnel.

Status:	The first training was done with Highway Department in fall of 2004. 5 Employees attended the conference in Merrimack, NH in January 2005. Three training sessions were held with the Fired Department personnel in March 2005.
Future goal(s):	Will expand education to other Town departments. We will provide additional training to Highway Department.

BMP 6-3: <u>Sweep each street annually.</u>

Responsible person(s):	Road Agent
Measurable goal(s):	Streets swept annually.
Status:	The Town owned streets sweeper operates continually; spring, summer and fall. All streets are swept at least once annually. Downtown urban areas are swept more frequently.
Future goal(s):	Monthly logs are being maintained. This will continue. Copies are to be provided periodically for the SWPPP file.

BMP 6-4: <u>Continue annual calibration of deicing compound applicators.</u>

Responsible person(s):	Road Agent
Measurable goal(s):	Calibration occurs annually.
Status:	This is an ongoing process with the Highway Department.
Future goal(s):	Continue program.

BMP 6-5: Maintain oil/water separator at DPW garage. Wash water discharge to sewer & recycle used oil.

Responsible person(s): Road Agent

Measurable goal(s): Inspect and maintain separator.

Status: Facility has passed EPA self audit (record on file @ Highway department). Oil/water separator is inspected at least twice per year and cleaned at least once per year.

We have now included oil-recycling data to this program. Oil recycling of in-house and for public has been part of ongoing Highway Department efforts (also refer to BMP 2-1).

Vehicles are washed inside garage at specified location.

Future goal(s): Maintain process.

BMP 6-6: Clean each catch basin once every three years.

Responsible person(s): Highway Supervisor & Road Agent

Measurable goal(s): Clean catch basins.

Status: The Highway department has a long standing program for catch basin cleaning which is being continued.

Future goal(s): Maintenance logs are being kept beginning spring 2004.

- This program will be expanded to municipally owned structural BMP's (BMP 5-4) once these have been identified.

BMP 6-7: Continue to log hazardous waste materials and store properly.

Responsible person(s):	Road Agent
Measurable goal(s):	Materials logged and stored
Status:	Same
Future goal(s):	Continue program.

BMP 6-8: Evaluate physical conditions, site design, and Best Management Practices to promote groundwater recharge.

Responsible person(s):	Town Engineer, Road Agent, and Director of Community Development and Town Planner.
Measurable goal(s):	Show evaluation of applicability and inclusion where possible for future development.
Status:	This is being encouraged in new development designs where applicable. Design plans and review documentation are on file at the Planning Department.
Future goal(s):	To continue inclusion as applicable. To add more emphasis through new bylaws BMP 5-2, 4-2 & 3-2.

	PERMIT YEAR ONE				PERMIT YEAR TWO				PERMIT YEAR THREE				PERMIT YEAR FOUR				PERMIT YEAR FIVE			
BMP ID	SPRING 04	SUMMER 04	FALL 04	WINTER 04-05	SPRING 05	SUMMER 05	FALL 05	WINTER 05-06	SPRING 06	SUMMER 06	FALL 06	WINTER 06-07	SPRING 07	SUMMER 07	FALL 07	WINTER 07-08	SPRING 08	SUMMER 08	FALL 08	WINTER 08-09
1-1	X				X				X				X				X			
1-2	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
1-3				X				X				X				X				X
1-4	Changed to Trifold			X				X				X				X				X
1-5	(new)																			
1-6	(new)																			
2-1																				
2-2																				
2-3				X																
2-4																				
2-5				X																
2-6				X				X				X				X				X
3-1																				
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3-5	(new)																			
4-1																				
4-2																				
4-3					Deleted															
4-4					Hotline setup															
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6-3																				
6-4				X				X				X				X				X
6-5	X		X		X		X		X		X		X		X		X		X	
6-6																				
6-7																				
6-8																				