



Civil Engineers
Land Surveyors
Scientists
Land Planners

Received
7-13-05



July 7, 2005

Thelma Murphy
US EPA, Region 01 / Office of Ecosystem Protection
1 Congress St, Suite 1100
(CMU)
Boston, MA 02114-2023

Jeff Andrews
New Hampshire Department of Environmental Services
Wastewater Engineering Bureau
6 Hazen Drive
PO Box 95
Concord, NH 03302-0095

Re: Municipal Separate Storm Sewer Systems (MS4s)
General Permit Annual Report – No. 2 March 2004- March 2005
Town of Pelham, NH

Dear Ms. Murphy:

TFMoran, Inc. (TFM) is pleased to submit for the Town of Pelham, New Hampshire their NPDES PII Small MS4 General Permit Annual Report in compliance with the Storm Water Phase II MS4 regulations.

Please feel free to contact me at (603) 898-8788 if you have any questions.

Sincerely,

TFMoran, Inc.

David L. Buhlman, P.E.
Senior Civil Engineer

cc: Town of Pelham, NH

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Bedford, NH • Manchester, NH • Keene, NH • Salem, NH

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Municipality/Organization: Pelham, NH

EPA NPDES Permit Number: NHR041025

**Annual Report Number
& Reporting Period:** No. 2: March 2004-March 2005

NPDES PII Small MS4 General Permit Annual Report

Part I. General Information

Contact Person: William D'Andrea **Title:** Planning Director

Telephone #: 603.635.7811 **Email:** plandir@pelhamweb.com

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: Thomas R. Graydos

Title: Town Administrator

Date: 7/7/05

Part II. Self-Assessment

The Town of Pelham has completed the required self-assessment and has determined that our municipality is in compliance with all permit conditions and Best Management Practices (BMP).

Part III. Summary of Minimum Control Measures

1. Public Education and Outreach

BMP ID #	BMP Description	Permit Year 1 2003 (Reliance on non-municipal partners indicated, if any)	Permit Year 2 2004	Permit Year 3 2005
1.1	<p>BMP Description Plan and research public education programs and plan for funding</p> <p>Measurable Goal(s) Plan and funds by 2004</p> <p>Responsible Dept./Person Name Planning Director</p>	<p>Planned Activities – Researched EPA Resources to add information and links to website, local cable program</p> <p>Progress on Goal(s) – Working with NRPC to create public information to be broadcast on the local cable program.</p>	<p>Planned Activities – Add EPA website links to town website; have storm water information / brochures / fact sheets available at Planning Office</p> <p>Progress on Goal(s) – Links were added to the Town website for EPA and NHDES information.</p>	<p>Planned Activities – Create more direct links to the EPA website for storm water issues.</p> <p>Progress on Goal(s) –</p>
1.2	<p>BMP Description Conduct public education programs</p> <p>Measurable Goal(s) 1 to 2 per year for permit term</p> <p>Responsible Dept./Person Name Planning Director</p>	<p>Planned Activities – Research storm water materials to broadcast on local public television; participate in NRPC programs</p> <p>Progress on Goal(s) – Working with NRPC to create public information for broadcast.</p>	<p>Planned Activities – Investigate adding Storm Water education to school curriculum; Investigate preparing a brochure for properties adjacent to waterways</p> <p>Progress on Goal(s) – Talked with the Town Cable people. Pelham is a member of the ‘PHASE II Compliance Group’ through NRPC. Decision made to not prepare a brochure for properties adjacent to waterways.</p>	<p>Planned Activities – Create or obtain storm water educational videos through the NRPC ‘PHASE II Compliance Group’</p> <p>Progress on Goal(s) –</p>

Environmental Protection Agency (EPA)
Nashua Regional Planning Commission (NRPC)
New Hampshire Department of Environmental Services (NHDES)

2. Public Involvement and Participation

BMP ID #	BMP Description	Permit Year 1 2003 (Reliance on non-municipal partners indicated, if any)	Permit Year 2 2004	Permit Year 3 2005
2.1	BMP Description Solicit the public as to the type of involvement of participation. Measurable Goal(s) Complete by 2005 Responsible Dept./Person Name Planning Director	Planned Activities – Progress on Goal(s) – No Action	Planned Activities – Explore venues for public involvement – schools, Boy Scouts, Girl Scouts, Planning Board workshops Progress on Goal(s) – Planning with NRPC.	Planned Activities – Continue Outreach Progress on Goal(s) –
2.2	BMP Description Conduct Public programs Measurable Goal(s) Complete by 2008 Responsible Dept./Person Name Planning Director	Planned Activities – Progress on Goal(s) – No Action	Planned Activities – No Action Progress on Goal(s) – No Action	Planned Activities – Reach out to the public. Progress on Goal(s) –

Nashua Regional Planning Commission (NRPC)

3. Illicit Discharge Detection and Elimination

BMP ID #	BMP Description	Permit Year 1 2003 (Reliance on non-municipal partners indicated, if any)	Permit Year 2 2004	Permit Year 3 2005
3.1	<p>BMP Description Plan and fund mapping of UA, need to look at overall mapping needs as it applies to illicit discharge detection & elimination control measure.</p> <p>Measurable Goal(s) Plan and funding by 2004</p> <p>Responsible Dept./Person Name Planning Director</p>	<p>Planned Activities – Planning GIS mapping of existing and new development storm sewers and looking at sources for funding; local public television announcements for participation in NRPC Household Hazardous Waste Collection days</p> <p>Progress on Goal(s) – ?</p>	<p>Planned Activities – Warrant Article for funding; continue with recycling efforts</p> <p>Progress on Goal(s) – Recycling Efforts ongoing.</p>	<p>Planned Activities – Expand recycling efforts; prepare warrant article.</p> <p>Progress on Goal(s) –</p>
3.2	<p>BMP Description Map outfalls & receiving water</p> <p>Measurable Goal(s) Complete by 2008</p> <p>Responsible Dept./Person Name Planning Director</p>	<p>Planned Activities – No Action</p> <p>Progress on Goal(s) – No Action</p>	<p>Planned Activities – Highway Dept. to record location of suspicious discharges to storm sewer during catch basin cleaning</p> <p>Progress on Goal(s) – Highway Department has recorded locations of suspicious discharges to storm sewer during catch basin cleaning in the Fall of 2004.</p>	<p>Planned Activities – To continue to record locations of suspicious discharges to storm sewers during catch basin cleaning.</p> <p>Progress on Goal(s) – Recording advancing.</p>
3.3	<p>BMP Description Develop storm sewer bylaw</p> <p>Measurable Goal(s) Complete by 2008</p> <p>Responsible Dept./Person Name Planning Director</p>	<p>Planned Activities – No Action</p> <p>Progress on Goal(s) – No Action</p>	<p>Planned Activities – No Action</p> <p>Progress on Goal(s) – No Action</p>	<p>Planned Activities – Conduct a review of the intent of a Storm Water bylaw.</p> <p>Progress on Goal(s) –</p>
3.4	<p>BMP Description Dry weather screening of outfalls</p> <p>Measurable Goal(s) Complete by 2008</p> <p>Responsible Dept./Person Name Planning Director</p>	<p>Planned Activities – No Action</p> <p>Progress on Goal(s) – No Action</p>	<p>Planned Activities – No Action</p> <p>Progress on Goal(s) – No Action</p>	<p>Planned Activities – To be determined</p> <p>Progress on Goal(s) –</p>
3.5	<p>BMP Description Develop policy for elimination of illicit discharges</p> <p>Measurable Goal(s) Complete by 2008</p> <p>Responsible Dept./Person Name Planning Director</p>	<p>Planned Activities – No Action</p> <p>Progress on Goal(s) – No Action</p>	<p>Planned Activities – No Action</p> <p>Progress on Goal(s) – No Action</p>	<p>Planned Activities – To be determined</p> <p>Progress on Goal(s) –</p>

Geographic Information System (GIS)
Nashua Regional Planning Commission (NRPC)
Urban Area (UA)

4. Construction Site Stormwater Runoff Control

BMP ID #	BMP Description	Permit Year 1 2003 (Reliance on non-municipal partners indicated, if any)	Permit Year 2 2004	Permit Year 3 2005
4.1	BMP Description Review existing subdivision and site plan review regulations Measurable Goal(s) Review complete 2004 Responsible Dept./Person Name Planning Director	Planned Activities – Reviewing regulations; proposing max. driveway grades and slopes within R.O.W.; incorporating BMPs not already in regulations (oil/water separators) Progress on Goal(s) – Initial review completed.	Planned Activities – Revise pre-construction meeting requirements to include new BMPs and Phase II requirements Progress on Goal(s) – Revisions made to the Pre-Construction Meeting Requirements.	Planned Activities – Continue to review and make revisions to the Pre-Construction Meeting Requirements. Progress on Goal(s) –
4.2	BMP Description Revise subdivision and site plan review regulations Measurable Goal(s) Revisions complete 2005 Responsible Dept./Person Name Planning Director	Planned Activities – No Action Progress on Goal(s) – No Action	Planned Activities – Revise Subdivision Regulations. Progress on Goal(s) – Revised Subdivision Regulations. Driveway Drainage	Planned Activities – Revise Site Plan Review Regulations. Progress on Goal(s) –
4.3	BMP Description Approval process for revised subdivision and site plan review regulations Measurable Goal(s) Spring 2006 Responsible Dept./Person Name Planning Director	Planned Activities – No Action Progress on Goal(s) – No Action	Planned Activities – No Action Progress on Goal(s) – No Action	Planned Activities – No Action Progress on Goal(s) –
4.4	BMP Description Implement new subdivision and site plan review regulations Measurable Goal(s) End of 2007 Responsible Dept./Person Name Planning Director	Planned Activities – No Action Progress on Goal(s) – No Action	Planned Activities – No Action Progress on Goal(s) – No Action	Planned Activities – No Action Progress on Goal(s) –
4.5	BMP Description Evaluate new subdivision and site plan review regulations Measurable Goal(s) End of permit term – 2008 Responsible Dept./Person Name Planning Director	Planned Activities – No Action Progress on Goal(s) – No Action	Planned Activities – No Action Progress on Goal(s) – No Action	Planned Activities – No Action Progress on Goal(s) –

Right Of Way (R.O.W.)

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

BMP ID #	BMP Description	Permit Year 1 2003 (Reliance on non-municipal partners indicated, if any)	Permit Year 2 2004	Permit Year 3 2005
5.1	BMP Description Review current structural BMPs Measurable Goal(s) Summer 2005 Responsible Dept./Person Name Planning Director	Planned Activities – No Action Progress on Goal(s) – No Action	Planned Activities – Review maintenance schedule of CBs; look at feasibility of oil/water separators; review maintenance of infiltration and vegetative BMPs Progress on Goal(s) – The feasibility of oil/water separators will be handled through Site Plan Review. Maintenance schedules of CBs have been reviewed, and will continue to clean basins yearly.	Planned Activities – Review maintenance of infiltrations and vegetative BMPs. Progress on Goal(s) –
5.2	BMP Description Review current non-structural BMPs Measurable Goal(s) Summer 2005 Responsible Dept./Person Name Planning Director	Planned Activities – No Action Progress on Goal(s) – No Action	Planned Activities – Review current Site Plan, Subdivision and Zoning Regulations Progress on Goal(s) – Reviewed current Site Plan, Subdivision and Zoning Regulations.	Planned Activities – Obtain information on Low Impact Development Technologies. Progress on Goal(s) –
5.3	BMP Description Make recommendations for new structural and non structural BMPs Measurable Goal(s) Summer 2006 Responsible Dept./Person Name Planning Director	Planned Activities – No Action Progress on Goal(s) – No Action	Planned Activities – No Action Progress on Goal(s) – No Action	Planned Activities – To be determined Progress on Goal(s) –
5.4	BMP Description Seek approval of new BMPs Measurable Goal(s) 2007 Responsible Dept./Person Name Planning Director	Planned Activities – No Action Progress on Goal(s) – No Action	Planned Activities – No Action Progress on Goal(s) – No Action	Planned Activities – To be determined Progress on Goal(s) –
5.5	BMP Description Incorporate BMPs into regulations Measurable Goal(s) 2008 Responsible Dept./Person Name Planning Director	Planned Activities – No Action Progress on Goal(s) – No Action	Planned Activities – No Action Progress on Goal(s) – No Action	Planned Activities – To be determined Progress on Goal(s) –

6. Pollution Prevention and Good Housekeeping in Municipal Operations

BMP ID #	BMP Description	Permit Year 1 2003 (Reliance on non-municipal partners indicated, if any)	Permit Year 2 2004	Permit Year 3 2005
6.1	<p>BMP Description Complete Spill Prevention Control & Countermeasure Plan (SPCCP)</p> <p>Measurable Goal(s) Complete by 2003</p> <p>Responsible Dept./Person Name Highway Department/ Transfer Station</p>	<p>Planned Activities – Complete SPCCP</p> <p>Progress on Goal(s) – Completed</p>	<p>Planned Activities – Review and update as necessary</p> <p>Progress on Goal(s) – Reviewed SPCCP</p>	<p>Planned Activities – Review SPCCP every 5 years as stated in plan, and update SPCCP as necessary.</p> <p>Progress on Goal(s) –</p>
6.2	<p>BMP Description Submit Storm Water multi-sector (industrial) permit</p> <p>Measurable Goal(s) Complete by 2003</p> <p>Responsible Dept./Person Name Highway Department</p> <p><i>Review & confirm</i></p>	<p>Planned Activities – EPA New England has determined that municipal highway vehicle maintenance facilities that are owned or operated by a municipality are not categorically subject to Phase I permitting requirements of the NPDES Storm Water Program. At this time, these facilities are not required to submit an NOI for permit coverage under the NPDES Storm Water Multi-Sector Permit for Industrial Activities (MSGP).</p> <p>Progress on Goal(s) – N/A</p>	<p>Planned Activities – N/A</p> <p>Progress on Goal(s) – N/A</p>	<p>Planned Activities – N/A</p> <p>Progress on Goal(s) –</p>
6.3	<p>BMP Description Train employees on SPCCP</p> <p>Measurable Goal(s) Throughout permit term</p> <p>Responsible Dept./Person Name Administrator / Highway Department</p>	<p>Planned Activities – Review SPCCP</p> <p>Progress on Goal(s) – Reviewed SPCCP to determine a training program.</p>	<p>Planned Activities – Implement SPCCP review and training for employees</p> <p>Progress on Goal(s) – Training sessions were held with employees, and they know the procedures.</p>	<p>Planned Activities – Ongoing training.</p> <p>Progress on Goal(s) –</p>
6.4	<p>BMP Description Review existing P2 and Good Housekeeping policies and practices</p> <p>Measurable Goal(s) Complete 2005</p> <p>Responsible Dept./Person Name Highway Department</p>	<p>Planned Activities – Reviewed street sweeping and CB cleaning practices</p> <p>Progress on Goal(s) – Ongoing</p>	<p>Planned Activities – Continue review of other BMP maintenance policies and practices; research recycling uses for grit/street sweepings</p> <p>Progress on Goal(s) – Ongoing</p>	<p>Planned Activities – Call PWD</p> <p>Progress on Goal(s) –</p>

6.5	BMP Description Revise and implement P2 and Good Housekeeping policies and practices Measurable Goal(s) 2006 Responsible Dept./Person Name Highway Department	Planned Activities – No Action Progress on Goal(s) – No Action	Planned Activities – No Action Progress on Goal(s) – No Action	Planned Activities – No Action Progress on Goal(s) –
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Environmental Protection Agency (EPA)
 Phase II (P2)
 Spill Prevention Control & Countermeasure Plan (SPCCP)

6a. Additions

6.6	BMP Description Street sweeping Measurable Goal(s) Sweep all streets annually; document volume collected Responsible Dept./Person Name Highway Department	Planned Activities – Sweep all streets; document volume collected. Progress on Goal(s) – Completed annual sweeping Volume documented.	Planned Activities – Continue program; implement volume documentation; research reuse/recycling Progress on Goal(s) – All streets were swept and about 12 tons of sand was picked up. Reuse/recycling of street wastes is permitted unless they are obviously contaminated, per DES Fact Sheet WMD-SW-32.	Planned Activities – Planned street sweeping has been held up due to budget cuts associated with the default budget. Progress on Goal(s) –
6.7	BMP Description Catch Basin Cleaning Measurable Goal(s) Clean all catch basins annually; document volume collected Responsible Dept./Person Name Highway Department	Planned Activities – Clean catch basins. Progress on Goal(s) – Completed annual CB cleaning and recorded volume collected	Planned Activities – Continue program; research reuse/recycling; document "heavy load areas" and research an "as-needed" frequency program Progress on Goal(s) – Continue program. Reuse/recycling is permitted if the material passes all of the tests. Heavy load areas are documented and basins cleaned.	Planned Activities – Continue program. Progress on Goal(s) –

Catch basin (CB)

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

BMP ID #	BMP Description	Permit Year 1 2003 (Reliance on non-municipal partners indicated, if any)	Permit Year 2 2004	Permit Year 1 2005
7.1	BMP Description Investigate if Pelham's storm water is causing water quality violations Measurable Goal(s) Throughout permit term Responsible Dept./Person Name Planning Director	Planned Activities – No Action Progress on Goal(s) – No Action	Planned Activities – Begin locating and investigating outfalls to Beaver Brook; research and monitor any Highway Dept. records of suspicious discharges to storm sewer during catch basin cleaning Progress on Goal(s) – Highway Dept. monitoring	Planned Activities – Continue effort. Progress on Goal(s) –

Part IV. Summary of Information Collected and Analyzed

A number of the permit year 1 and 2 BMP goals not completed was due to lack of funding for these new programs. The Town is looking into additional funding options and volunteer participation options to complete those BMP goals as well as those planned for permit year 3.

Part V. Program Outputs & Accomplishments (OPTIONAL)

Education, Involvement, and Training

Household Hazardous Waste Collection Days – (NRPC 2003)		
▪ days sponsored	(#)	5
▪ community participation – See Attached	(%)	
School curricula implemented	(y/n)	Investigating

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

Construction

Estimated percentage of construction starts adequately regulated for erosion and sediment control	(%)	100
Site inspections completed	(# or %)	100%
Complaints/concerns received from public	(#)	5

Operations and Maintenance

Average frequency of catch basin cleaning (non-commercial/non-arterial streets)	(times/yr)	yearly
Average frequency of catch basin cleaning (commercial/arterial or other critical streets)	(times/yr)	yearly
Total number of structures cleaned	(#)	1071
Storm drain cleaned	(LF or mi.)	0
Qty. of screenings/debris removed from storm sewer infrastructure	(lbs. or tons)	238
Disposal or use of sweepings (landfill, POTW, compost, recycle for sand, beneficial use, etc.)		Compost

Average frequency of street sweeping (non-commercial/non-arterial streets)	(times/yr)	Budget cuts
Average frequency of street sweeping (commercial/arterial or other critical streets)	(times/yr)	Yearly
Qty. of sand/debris collected by sweeping	(lbs. or tons)	105 Tons
Disposal of sweepings (landfill, POTW, compost, beneficial use, etc.)	(location)	Town yard
Anti-/De-Icing products and ratios	% NaCl % CaCl ₂ % MgCl ₂ % CMA % Kac % KCl % Sand	2700 tons salt, 8 tons flaked calcium, 1310 tons sand.
Pre-wetting techniques utilized	(y/n)	N
Manual control spreaders used	(y/n)	Y
Automatic or Zero-velocity spreaders used	(y/n)	N
Estimated net reduction in typical year salt application	(lbs. or %)	0
Salt pile(s) covered in storage shed(s)	(y/n)	Y
Storage shed(s) in design or under construction	(y/n)	N