Civil Engineers
Structural Engineers
Traffic Engineers
Land Surveyors
Landscape Architects
Scientists

Received
11-13-06

November 7, 2006

Thelma Murphy
US EPA, Region 1 / 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. 3 March 2005- March 2006
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.**

Daniel Blais
Project Manager

cc: Town of Pelham, NH

68 Stiles Road, Unit G
Salem, NH 03079
Phone (603) 898-8788
Fax (603) 898-8820
www.tfmoran.com

**Municipality/Organization:** **Pelham, NH**

**EPA NPDES Permit Number:** **NHR041025**

**Annual Report Number & Reporting Period:** **No. 3: March 2005-March 2006**

# NPDES PII Small MS4 General Permit Annual Report

## Part I. General Information

Contact Person: Jeff Gowan 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: Th. R. G.

Printed Name: Thomas R. Gaydos

Title: Town Administrator

Date: 6 Nov. 2006

## 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 2<br>2004<br>(Reliance on non-municipal partners indicated, if any) | Permit Year 3<br>2005 | Permit Year 4<br>2006 |
|---|---|---|---|---|
| 1.1 | **BMP Description**<br>Plan and research public education programs and plan for funding<br>**Measurable Goal(s)**<br>Plan and funds by 2004<br>**Responsible Dept./Person Name**<br>Planning Director | **Planned Activities –**<br>Add EPA website links to town website; have storm water information / brochures / fact sheets available at Planning Office.<br>**Progress on Goal(s) –**<br>Links were added to the Town website for EPA and NHDES information. | **Planned Activities –**<br>Create more direct links to the EPA website for stormwater issues.<br>**Progress on Goal(s) –**<br>Links have been added to town website. | **Planned Activities –**<br>Stormwater Committee to research further programs and funding. |
| 1.2 | **BMP Description**<br>Conduct public education programs<br>**Measurable Goal(s)**<br>1 to 2 per year for permit term<br>**Responsible Dept./Person Name**<br>Planning Director | **Planned Activities –**<br>Investigate adding Storm Water education to school curriculum; Investigate preparing a brochure for properties adjacent to waterways.<br>**Progress on Goal(s) –**<br>Talked with the Town Cable people.<br>Pelham is a member of the "PHASE II Compliance Group" through NRPC.<br>Decision made to not prepare a brochure for properties adjacent to waterways. | **Planned Activities –**<br>Create or obtain storm water educational videos through the NRPC 'PHASE II Compliance Group'<br>**Progress on Goal(s) –**<br>The town has requested a copy of EPA "After the Storm" video which will be shown on community local access television station. | **Planned Activities –**<br>Show EPA video "After the Storm" on community local access television station. Stormwater Committee to research additional programs. |

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

### 1a. Additions

| | | | | |
|---|---|---|---|---|
| **1.3** | **BMP Description**<br>Save Long Pond Brochure Cyanobacteria Awareness<br>**Measurable Goal(s)**<br>Distribute as needed<br>**Responsible Dept./Person Name**<br>Parks and Recreation Advisory Board | | **Progress on Goal(s) –**<br>Brochures were mailed to residents of Long Pond. | **Planned Activities –**<br>Call select residents of Long Pond to gauge effectiveness of program. Continue to monitor water quality at Long Pond. |
| **1.4** | **BMP Description**<br>Implement Stormwater Committee<br>**Measurable Goal(s)**<br>Meet monthly in 2006 and at least bi-monthly thereafter to plan and evaluate BMP implementations<br>**Responsible Dept./Person Name**<br>Planning Dept., School Board, Town Administration, Highway Dept., Parks and Recreation Advisory Board, and Conservation Commission | | **Progress on Goal(s) –**<br>Committee is being assembled with representatives from the departments/ boards noted. | **Planned Activities –**<br>To continue bi-monthly meetings. |

## 2. Public Involvement and Participation

| BMP ID # | BMP Description | Permit Year 2<br>2004<br>(Reliance on non-municipal partners indicated, if any) | Permit Year 3<br>2005 | Permit Year 4<br>2006 |
|---|---|---|---|---|
| 2.1 | **BMP Description**<br>Solicit the public as to the type of involvement of participation<br>**Measurable Goal(s)**<br>Complete by 2005<br>**Responsible Dept./Person Name**<br>Planning Director | **Planned Activities –**<br>Explore venues for public involvement – schools, Boy Scouts, Girl Scouts, Planning Board workshops.<br>**Progress on Goal(s) –**<br>Planning with NRPC. | **Planned Activities –**<br>Continue Outreach.<br>**Progress on Goal(s) –**<br>This BMP has been replaced by BMP 1.4. | **Planned Activities –**<br>No activity planned. |
| 2.2 | **BMP Description**<br>Conduct public programs<br>**Measurable Goal(s)**<br>Complete by 2007<br>**Responsible Dept./Person Name**<br>Planning Director and Stormwater Committee | **Planned Activities –**<br>No Action.<br>**Progress on Goal(s) –**<br>No Action. | **Planned Activities –**<br>Reach out to the public.<br>**Progress on Goal(s) –** | **Planned Activities –**<br>Continue public outreach. |

Nashua Regional Planning Commission (NRPC)

## 2a. Additions

| | | | | |
|---|---|---|---|---|
| 2.3 | **BMP Description**<br>Hold hazardous waste collection days at Nashua DPW<br>**Measurable Goal(s)**<br>Regional hazardous waste collection days are held annually with drop-off located at the Nashua DPW garage.<br>**Responsible Dept./Person Name**<br>Highway Department | | **Progress on Goal(s) –**<br>Hazardous waste collection days were held five (5) times, April through November in 2005. | **Planned Activities –**<br>Five (5) hazardous waste collection days are scheduled for 2006. |

## 3. Illicit Discharge Detection and Elimination

| BMP ID # | BMP Description | Permit Year 2<br>2004<br>(Reliance on non-municipal partners indicated, if any) | Permit Year 3<br>2005 | Permit Year 4<br>2006 |
|---|---|---|---|---|
| 3.1 | **BMP Description**<br>Plan and fund mapping of UA, need to look at overall mapping needs as it applies to illicit discharge detection & elimination control measures<br>**Measurable Goal(s)**<br>Plan and funding by 2004 and look at needs as it applies to illicit discharge detection and elimination control measures<br>**Responsible Dept./Person Name**<br>Planning Director | **Planned Activities –**<br>Warrant Article for funding; continue with recycling efforts.<br>**Progress on Goal(s) –**<br>Recycling Efforts ongoing. | **Planned Activities –**<br>Expand recycling efforts; prepare warrant article.<br>**Progress on Goal(s) –**<br>Warrant article failed. | **Planned Activities –**<br>Identify alternative sources of funding. |
| 3.2 | **BMP Description**<br>Map outfalls & receiving waters<br>**Measurable Goal(s)**<br>By end of 5-year permit term, outfall mapping to be completed<br>**Responsible Dept./Person Name**<br>Planning Director | **Planned Activities –**<br>Highway Dept. to record location of suspicious discharges to storm sewer during catch basin cleaning.<br>**Progress on Goal(s) –**<br>Highway Department has recorded locations of suspicious discharges to storm sewer during catch basin cleaning in the Fall of 2004. | **Planned Activities –**<br>To continue to record locations of suspicious discharges to storm sewers during catch basin cleaning.<br>**Progress on Goal(s) –**<br>Recording advancing. | **Planned Activities –**<br>Mapping to be completed. |
| 3.3 | **BMP Description**<br>Develop stormwater bylaw<br>**Measurable Goal(s)**<br>Bylaws developed and presented to selectman<br>**Responsible Dept./Person Name**<br>Planning Director | **Planned Activities –**<br>No Action.<br>**Progress on Goal(s) –**<br>No Action. | **Planned Activities –**<br>Conduct a review of the intent of a Storm Water bylaw.<br>**Progress on Goal(s) –**<br>Currently being developed. | **Planned Activities –**<br>Review bylaws. Establish a review and hearing for their acceptance. Adopt bylaws by Spring 2007. |
| 3.4 | **BMP Description**<br>Dry weather screening of outfalls<br>**Measurable Goal(s)**<br>Screening at outfalls during dry weather<br>**Responsible Dept./Person Name**<br>Highway Department | **Planned Activities –**<br>No Action.<br>**Progress on Goal(s) –**<br>No Action. | **Planned Activities –**<br>To be determined<br>**Progress on Goal(s) –**<br>Screening to be conducted during mapping. | **Planned Activities –**<br>Continued screening during mapping. |

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| **3.5** | **BMP Description**<br>Develop policy for elimination of illicit discharges<br>**Measurable Goal(s)**<br>Prepared policy for elimination of illicit discharges<br>**Responsible Dept./Person Name**<br>Planning Director | **Planned Activities –**<br>No Action.<br><br>**Progress on Goal(s) –**<br>No Action. | **Planned Activities –**<br>To be determined.<br><br>**Progress on Goal(s) –**<br>Model ordinance has been obtained from NEIWPCC. The town's council is adapting the ordinance for the town. | **Planned Activities –**<br>Policy to be adopted by 2007. |

Geographic Information System (GIS)
Nashua Regional Planning Commission (NRPC)
Urban Area (UA)
New England Interstate Water Pollution Control Commission (NEIWPCC)

## 4. Construction Site Stormwater Runoff Control

| BMP ID # | BMP Description | Permit Year 2<br>2004<br>(Reliance on non-municipal partners indicated, if any) | Permit Year 3<br>2005 | Permit Year 4<br>2006 |
|---|---|---|---|---|
| 4.1 | **BMP Description**<br>Review existing subdivision and site plan review regulations<br>**Measurable Goal(s)**<br>Review of Subdivision and Site Plan Regulations<br>**Responsible Dept./Person Name**<br>Planning Director | **Planned Activities –**<br>Revise pre-construction meeting requirements to include new BMPs and Phase II requirements.<br><br>**Progress on Goal(s) –**<br>Revisions made to the Pre-Construction Meeting Requirements. | **Planned Activities –**<br>Continue to review and make revisions to the Pre-Construction Meeting Requirements.<br><br>**Progress on Goal(s) –**<br>Pre-construction meeting adopted. | **Planned Activities –**<br>No activity planned. |
| 4.2 | **BMP Description**<br>Revise subdivision and site plan review regulations<br>**Measurable Goal(s)**<br>Revise of Subdivision and Site Plan Regulations<br>**Responsible Dept./Person Name**<br>Planning Director | **Planned Activities –**<br>Revise Subdivision Regulations.<br><br>**Progress on Goal(s) –**<br>Revised Subdivision Regulations. Driveway Drainage. | **Planned Activities –**<br>Revise Site Plan Review Regulations.<br><br>**Progress on Goal(s) –**<br>Subdivision regulations now include requirements for stormwater management plans. | **Planned Activities –**<br>No activity planned. |
| 4.3 | **BMP Description**<br>Approval process for revised subdivision and site plan review regulations<br>**Measurable Goal(s)**<br>Spring 2006<br>**Responsible Dept./Person Name**<br>Planning Director | **Planned Activities –**<br>No Action.<br><br>**Progress on Goal(s) –**<br>No Action. | **Planned Activities –**<br>No Action.<br><br>**Progress on Goal(s) –**<br>Consolidated BMP 4.3, 4.4, and 4.5. | **Planned Activities –**<br>Continued review. |
| 4.4 | **BMP Description**<br>Implement new subdivision and site plan review regulations<br>**Measurable Goal(s)**<br>End of 2007<br>**Responsible Dept./Person Name**<br>Planning Director | **Planned Activities –**<br>No Action.<br><br>**Progress on Goal(s) –**<br>No Action. | **Planned Activities –**<br>No Action.<br><br>**Progress on Goal(s) –**<br>Consolidated BMP 4.3, 4.4, and 4.5. | **Planned Activities –**<br>Continued review. |

| | | | | |
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| **4.5** | **BMP Description**<br>Evaluate new subdivision and site plan review regulations<br>**Measurable Goal(s)**<br>End of permit term – 2008<br>**Responsible Dept./Person Name**<br>Planning Director | **Planned Activities –**<br>No Action.<br><br>**Progress on Goal(s) –**<br>No Action. | **Planned Activities –**<br>No Action.<br><br>**Progress on Goal(s) –**<br>Consolidated BMP 4.3, 4.4, and 4.5. | **Planned Activities –**<br>Continued review. |

Right Of Way (R.O.W.)

## 4a. Additions

| | | | | |
|---|---|---|---|---|
| **4.6** | **BMP Description**<br>Site inspections<br>**Measurable Goal(s)**<br>Inspections conducted and documented<br>**Responsible Dept./Person Name**<br>Building Department and Conservation Commission | | **Progress on Goal(s) –**<br>The town has an ongoing inspection process for subdivision and site plans. This includes ongoing inspection of stormwater and erosion control measures. | **Planned Activities –**<br>To continue with construction inspections. |
| **4.7** | **BMP Description**<br>Independent engineering company reviewing site plans and stormwater controls<br>**Measurable Goal(s)**<br>Independent review of all plans<br>**Responsible Dept./Person Name**<br>Planning Director | | **Progress on Goal(s) –**<br>The independent plan review process has been in place for many years. This has always included drainage and stormwater. | **Planned Activities –**<br>To continue the program and incorporate updated regulations (BMP 3.3) |

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

| BMP ID # | BMP Description | Permit Year 2<br>2004<br>(Reliance on non-municipal partners indicated, if any) | Permit Year 3<br>2005 | Permit Year 5<br>2006 |
|---|---|---|---|---|
| 5.1 | **BMP Description**<br>Review current structural BMPs<br>**Measurable Goal(s)**<br>Regular inspections of structural BMPs<br>**Responsible Dept./Person Name**<br>Planning Director and Highway Department | **Planned Activities –**<br>Review maintenance schedule of CBs; look at feasibility of oil/water separators; review maintenance of infiltration and vegetative BMPs.<br><br>**Progress on Goal(s) –**<br>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 –**<br>Review maintenance of infiltrations and vegetative BMPs.<br><br>**Progress on Goal(s) –**<br>The Town constructed one (1) new catch basin and replaced six (6) catch basins. The Town installed installed open drainage systems on two roads and replaced two (2) culverts. | **Planned Activities –**<br>Continued research and maintenance. |
| 5.2 | **BMP Description**<br>Review current non-structural BMPs<br>**Measurable Goal(s)**<br>Obtain Low Impact Development (LID) Technology Information<br>**Responsible Dept./Person Name**<br>Planning Director and Highway Department | **Planned Activities –**<br>Review current Site Plan, Subdivision and Zoning Regulations.<br>**Progress on Goal(s) –**<br>Reviewed current Site Plan, Subdivision and Zoning Regulations. | **Planned Activities –**<br>Obtain information on Low Impact Development Technologies.<br>**Progress on Goal(s) –**<br>Received Low Impact Development Technology information. | **Planned Activities –**<br>This is a precursor to BMP 5.3. |
| 5.3 | **BMP Description**<br>Make recommendations for new structural and non-structural BMPs<br>**Measurable Goal(s)**<br>Incorporate and promote LID technologies into proposed developments<br>**Responsible Dept./Person Name**<br>Planning Director | **Planned Activities –**<br>No Action.<br><br>**Progress on Goal(s) –**<br>No Action. | **Planned Activities –**<br>To be determined.<br><br>**Progress on Goal(s) –**<br>The Town is currently reviewing LID technology information. | **Planned Activities –**<br>Incorporate LID technologies into developments. |

| | | | | |
|---|---|---|---|---|
| 5.4 | **BMP Description**<br>Seek approval of new BMPs<br>**Measurable Goal(s)**<br>Revisions and replacement to BMPs as necessary<br>**Responsible Dept./Person Name**<br>Planning Director and Stormwater Committee | **Planned Activities –**<br>No Action.<br><br>**Progress on Goal(s) –**<br>No Action. | **Planned Activities –**<br>To be determined.<br><br>**Progress on Goal(s) –**<br>Committee formed policies being developed. | **Planned Activities –**<br>To update BMPs as necessary. |
| 5.5 | **BMP Description**<br>Incorporate BMPs into regulations<br>**Measurable Goal(s)**<br>Develop ordinance for post-construction stormwater management<br>**Responsible Dept./Person Name**<br>Planning Director | **Planned Activities –**<br>No Action.<br><br>**Progress on Goal(s) –**<br>No Action. | **Planned Activities –**<br>To be determined.<br><br>**Progress on Goal(s) –**<br>The town has adopted the requirement of a stormwater management plan for any tract of land being developed where one or more of the following conditions are proposed or present: (1) a cumulative disturbed area exceeding 20,000 square feet; (2) construction of a street road or driveway; (3) the site is near an area that the Board has determined there exist similar problems; (4) disturbed critical areas; (5) | **Planned Activities –**<br>Ongoing enforcement. |

## 6. Pollution Prevention and Good Housekeeping in Municipal Operations

| BMP ID # | BMP Description | Permit Year 2<br>2004<br>(Reliance on non-municipal partners indicated, if any) | Permit Year 3<br>2005 | Permit Year 4<br>2006 |
|---|---|---|---|---|
| 6.1 | **BMP Description**<br>Complete Spill Prevention Control & Countermeasure Plan (SPCCP)<br>**Measurable Goal(s)**<br>Complete SPCCP<br>**Responsible Dept./Person Name**<br>Highway Department & Transfer Station | **Planned Activities –**<br>Review and update as necessary.<br>**Progress on Goal(s) –**<br>Reviewed SPCCP. | **Planned Activities –**<br>Review SPCCP every 5 years as stated in plan, and update SPCCP as necessary.<br>**Progress on Goal(s) –**<br>Completed in 2003. | **Planned Activities –**<br>No activity planned. |
| 6.2<br>6.3 | **Removed**<br>**BMP Description**<br>Train employees on SPCCP<br>**Measurable Goal(s)**<br>Throughout permit term<br>**Responsible Dept./Person Name**<br>Town Administrator & Highway Department | **Planned Activities –**<br>Implement SPCCP review and training for employees.<br>**Progress on Goal(s) –**<br>Training sessions were held with employees, and they know the procedures. | **Planned Activities –**<br>Ongoing training.<br>**Progress on Goal(s) –**<br>Training is ongoing annually. | **Planned Activities –**<br>Ongoing training. |
| 6.4 | **BMP Description**<br>Review existing P2 and Good Housekeeping policies and practices<br>**Measurable Goal(s)**<br>Continue annual review and training for Town personnel throughout permit term<br>**Responsible Dept./Person Name**<br>Highway Department | **Planned Activities –**<br>Continue review of other BMP maintenance policies and practices; research recycling uses for grit/street sweepings.<br>**Progress on Goal(s) –**<br>Ongoing. | **Planned Activities –**<br>Call PWD.<br>**Progress on Goal(s) –**<br>Met with Thelma Murphy of USEPA to review added BMP 6.8. | **Planned Activities –**<br>Continued review. |
| 6.5 | **BMP Description**<br>Revise and implement P2 and Good Housekeeping policies and practices<br>**Measurable Goal(s)**<br>Revisions to continue<br>**Responsible Dept./Person Name**<br>Highway Department | **Planned Activities –**<br>No Action.<br>**Progress on Goal(s) –**<br>No Action. | **Planned Activities –**<br>No Action.<br>**Progress on Goal(s) –**<br>BMP 6.8 added. | **Planned Activities –**<br>Continue revisions of BMPs. |

Environmental Protection Agency (EPA)
Phase II (P2)
Spill Prevention Control & Countermeasure Plan (SPCCP)

| | | | | |
|---|---|---|---|---|
| **6.6** | **BMP Description**<br>Street sweeping<br>**Measurable Goal(s)**<br>Sweep all streets annually; document volume collected<br>**Responsible Dept./Person Name**<br>Highway Department | **Planned Activities –**<br>Continue program; implement volume documentation; research reuse/recycling.<br>**Progress on Goal(s) –**<br>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 –**<br>Planned street sweeping has been held up due to budget cuts associated with the default budget.<br>**Progress on Goal(s) –**<br>The town has swept approximately 30 miles of roads and all town municipal facilities parking lots. Approximately 60 tons of sand was picked up. The sand is being stockpiled at the transfer station for screening and reuse. | **Planned Activities –**<br>Continue program. |
| **6.7** | **BMP Description**<br>Catch Basin Cleaning<br>**Measurable Goal(s)**<br>Clean all catch basins annually; document volume collected<br>**Responsible Dept./Person Name**<br>Highway Department | **Planned Activities –**<br>Continue program; research reuse/recycling; document "heavy load areas" and research an "as-needed" frequency program.<br>**Progress on Goal(s) –**<br>Continue program.<br>Reuse/recycling is permitted if the material passes all of the tests. Heavy load areas are documented and basins cleaned. | **Planned Activities –**<br>Continue program.<br>**Progress on Goal(s) –**<br>The town has cleaned 1,158 structures with the sand stockpiled at the transfer station for screening and reuse. | **Planned Activities –**<br>Continue program. |

Catch basin (CB)

## 6a. Additions

| | | | | |
|---|---|---|---|---|
| **6.8** | **BMP Description**<br>Implement integrated pest management (IPM) at town facilities<br>**Measurable Goal(s)**<br>Quantification of pesticides used at town facilities<br>**Responsible Dept./Person Name**<br>Parks and Recreation Advisory Board | | **Progress on Goal(s) –**<br>To be started in 2006. | **Planned Activities –**<br>To minimize broadcast spraying of non-specific pesticides. |

## 7. BMPs for Meeting Total Maximum Daily Load (TMDL) Waste Load Allocations (WLA)

*<<if applicable>>*

| BMP ID # | BMP Description | Permit Year 2<br>2004<br>(Reliance on non-municipal partners indicated, if any) | Permit Year 3<br>2005 | Permit Year 4<br>2006 |
|---|---|---|---|---|
| 7.1 | **BMP Description**<br>Investigate if Pelham's storm water is causing water quality violations<br>**Measurable Goal(s)**<br>Throughout permit term<br>**Responsible Dept./Person Name**<br>Planning Director | **Planned Activities –**<br>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.<br>**Progress on Goal(s) –**<br>Highway Dept. monitoring. | **Planned Activities –**<br>Continue effort.<br>**Progress on Goal(s) –** | **Planned Activities –**<br>Continue program. |

## 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 2005) | | |
|---|---|---|
| ▪ Days sponsored | (#) | 5 |
| ▪ Community participation | (# households) | 120 households |
| 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 | (#) | 1,158 |
| 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.) | | Stockpiled may screen |

| | | |
|---|---|---|
| Average frequency of street sweeping (non-commercial/non-arterial streets) | (times/yr) | Yearly |
| Average frequency of street sweeping (commercial/arterial or other critical streets) | (times/yr) | Yearly |
| Qty. of sand/debris collected by sweeping | (lbs. or tons) | 60 tons |
| Disposal of sweepings (landfill, POTW, compost, beneficial use, etc.) | (location) | Stockpiled may screen |
| Anti-/De-Icing products and ratios | % NaCl<br>% $CaCl_2$<br>% $MgCl_2$<br>% CMA<br>% Kac<br>% KCl<br>% Sand | 1,947 tons salt, 5 tons flaked calcium, 1,0222 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 |