TOWN OF HUDSON

Board of Selectmen

12 School Street Hudson, New Hampshire 03051 603/886-6024 FAX 603/598-6481

April 10, 2007

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, 2007 Town of Hudson, NH.

We acknowledge receipt of the EPA "Report Card" dated August 18, 2006. We are having our consultants do a peer review of portions of our program to best ensure our compliance with our permit and program goals.

Sincerely,

HUDSON BOARD OF SELECTMEN

Shawn N. Jasper
Chairman

cc: NHDES
Steve Malizia, Town Administrator
Sean Sullivan, Community Development Director
Kevin Burns, Road Agent
Jess Forrence, Highway Supervisor
John Cashell, Town Planner
Tom Sommers, PE, Town Engineer
Gary Webster, Civil Engineer

NPDES - STORMWATER II

ANNUAL REPORT

APRIL 1, 2007

(For work efforts through April 1, 2007)

I. PERMIT NUMBER NHR041013

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

BMP 3-1 Illicit discharge detention & elimination

In 2006 we completed cataloging our Stormwater Outfalls. Over 1,000 outfall points were cataloged by GPS. Coordinates descriptions and pictures are on file for each point.

BMP 3-1 Mapping Outfalls

Hudson's entire system of outfalls was cataloged by GPS in 2006. Over 1,000 locations are on file with descriptions and pictures. The coordinates for these will be imported into our GIS system this year.

BMP 3-2, 4-2 & 5-2

Stormwater regulations have been developed and approved through a public hearing process. The regulations were reviewed prior to adoption by EPA staff and town legal counsel. These regulations are now enforceable.

BMP 2-4

A new recycling and trash curbside pickup plan is being implemented as of July 1, 2007. This plan will encourage more recycling by limiting the amount of trash pickup (without a direct surcharge fee) and providing for unlimited recyclable pickup without direct fee.

III. OTHER NOTABLES:

The Town Engineer continues to be involved with the Regional Stormwater group. This group meets at NRPC typically once every two to three months. The Regional Stormwater group is now working with NRPC to prepare a multi age curriculum for schools.

Town representatives continue to attend available stormwater management workshops and seminars.

The Otarnic Pond Cooperative, mobile homes park; located directly adjacent to Ottarnic Pond is having a new sewer system installed. The Town if financing a portion of this project as well as administering the construction program. The Town will own and operate this sewer system. The significance's of this is that failed community septic systems adjacent to Ottarnic Pond, "a sensitive receptor" will be put out of service.

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 at least two periods over the last year. The videos are alternated. 5,000 trifolds were prepared for us in 2005. These contain simple "do's and don'ts". These are provided as handouts at the Town Highway Department and at two locations in the Town Hall. We have mailed the trifolds to homeowners and customers with our 2007 Spring sewer invoices.
Future goal(s):	Continue to promote trifold information at existing sites. Continue to show videos on local access TV two times per year.

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 in 2005.
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:	An article was included in the March 2006 Annual Report.

Future goal(s):	Continue with annual Town report updates.

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 in 2004. Committee meets quarterly. Meeting notes are on file with the Stormwater files.
Future goal(s):	To continue meetings for the foreseeable future quarterly.

Task –2 **Public Participation**

BMP 2-1: Hold Hazardous Waste Collection Days at Nashua DPW, and continue Waste Oil Program.

Responsible Person(s)	Nashua Regional Planning Commission (NRPC)
Measurable goal(s):	Regional hazardous waste collection days are held five times each year with drop-off located at the Nashua DPW garage. Note: waste oil drop off is also available at the Highway Garage during regular business hours (7:00am to 3:00pm).
Status:	Hazardous waste collection days were held between April through November in 2005. The Town of Hudson's local cable TV showed an announcement prior to each date. These dates were also announced through an informational brochure, published by the Town of Hudson Highway Department. The summary of regional collection participation by Towns is on file.
Future Goal(s):	The schedule 2007 has not yet been published by the NRPC. Continuation of this program is expected.

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 per year.
Status:	In the same Hudson Highway Department brochure noted for BMP 2-1 above the Town cleanup days are published. This brochure goes out to all Town residents. 8-days are scheduled per year.

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.

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.

Future: The Town is instituting a new collection program to increase recycling. Beginning July 2007 trash pickup will be limited to 1 or 2 trash barrels beyond which premium fees will be charged. Recycling will be collected along side the trash without any volume limitation. It is anticipated that recycling will increase substantially.

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: Outfalls were cataloged in 2006. This includes GPS coordinates a description and pictures of each location, over 1,000 points have been cataloged including outfalls and sub-outfall locations. Data is on computer disks and hard

copied. Outfalls are cross-referenced to watershed.

Future goal(s): Include the outfalls as a layer in the Town GIS system.

Include in the catalog any new outfalls constructed a part of any new developments.

BMP 3-2: Develop effective storm sewer bylaws.

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

Measurable goal: Bylaws developed and approved by the Town.

Status: Stormwater regulations have been approved and adopted by Town Planning Board through a formal hearing process.

Future goal(s): To enforce the new stormwater regulations.

BMP 3-3: Dry weather screening of outfalls.

Responsible person(s): Town Engineer

Measurable goal(s): Number of outfalls screened.

Status: All outfalls were visually screened as part of the outfall location effort done in 2006 (see BMP 3-1). Interns doing the work were trained by New Hampshire Department Environmental Services (NHDES) in basic visual illicit detention methods, at the start of the outfall location process.

There are two 303d impaired water bodies in Hudson. Ottarnic Pond and Merrimack River below Nashua River. Outfalls for the Merrimack River have been screened by NHDES.

Ottarnic Pond was treated for Milfoil contamination in 2005. This is a new effort undertaken by a volunteer group. This effort is partly underwritten by the Town.

One outfall was found to have questionable discharge. This has been tested with inconclusive results. We are continuing to monitor this.

Future goal(s): Screen all outfalls every three-years on a rotating basis. If discharges are found we will attempt to locate source and facilitate correction.

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. We have copies of the NHDES outfall cataloging for the Merrimack River on file.

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): Test and locate sources and facilitate correction.

Status: Hudson has Sewer and Drain Division personnel who through visual inspection and video camera (for pipe inspection) has and will continue detection and correction of illicit discharges. We are still following up on one possible illicit discharge point found during the outfall location program.

Future goal(s): Documentation of efforts will be cataloged and will include the outfalls located in BMP 3-1 above.

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. We will also outfall illicit discharge detection program.

Control measure 4: Construction site run-off control.

BMP 4-1: Independent engineering company reviewing site plans and stormwater controls.

Responsible person(s):	Town Engineer & Town Planner
Measurable goal(s):	Independent review of all plans.
Status:	For many years the process of independent plan review has been in place. This has always included drainage and stormwater. Every private site project is processed through this review process. Files for each are maintained at the engineering and planning offices.
Future goal(s):	To continue the program and incorporate updated regulations which are now approved and enforceable.

BMP 4-2: Draft and present bylaws to require erosion and sedimentation control plans.

Responsible person(s):	Town Engineer & Town Planner
Measurable goal(s):	Draft and present bylaws.
Status:	This effort is part of BMP 3-2.

Future goal(s)	To enforce the approved regulations.

BMP 4-3: Draft and present bylaws to require waste management plan (deleted 2005).

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 this year.
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 at least 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 from developers. 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.

Note: In the summer of 2006 EPA representatives visited six of our construction sites with us. We reviewed many aspects of our program with them. They gained a good snapshot of our ongoing program. We gained insight to the EPA construct program concerns.

BMP 4-6: <u>Enforce site permits and ordinances.</u>

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 Stormwater management requirements and wetlands protection are 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. This form is updated as necessary.

The engineering department and/or code enforcement officer sends out enforcement letters. Records are kept at the Community Development office. (BMP 2-3).

- Two wetlands buffer fines were issued in January of 2006;
- Six citation letters were sent out in 2005. With follow-up remediation actions required. Two of these continued to be followed up on;
- Six citations were issued for wetlands/buffer violations, and two fines for such were assessed in 2006;

In the spring of 2003, 2004, 2005 and 2006 letters have been sent to engineers, land planners, contractors and developers informing them of the requirement to comply with the EPA, NHDES-II construction requirements. Copies of letters are in SWPPP files.

Future goal(s): Continue notification inspection and enforcement program.

Task 5: **Post Construction Runoff Control**

BMP 5-1: Continue to allow "Open Space Development" – (Zoning Ordinance Article X1, 334.47)

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

Measurable goal(s): Ordinance on file.

Status: The open space development ordinance has been the basis for several development projects done over the past years.

This ordinance has recently been amended to reduce density and increase open space.

Future goal(s):	This ordinance will continue into the foreseeable future with possible amendment from time to time.

BMP 5-2: Draft and present bylaws requiring runoff controls for new and re-development.

Responsible person(s):	Director of Community Development & Town Engineer.
Measurable goal(s):	Finalize bylaws (regulations).
Status:	See BMP 3-2 & 4-2. Regulations were adopted and are in force.
Future goal(s):	Continue to review regulations as necessary. Use regulations on going for future construction in town.

BMP 5-3: Recommend a BMP manual for use by planners & developers.

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 Stormwater Management Plan. It is used for review of new subdivisions and site plans and is referenced to developers, contractors and designers.

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

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 are done.

Future goal(s): Maintenance program and schedule will be developed this year for public outfall.

Municipality owned structural BMP's will be put on a maintenance cycle anticipated to begin in 2008.

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 obligate private owners to follow through. Post development programs are now required by stormwater regulations.

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). These have been mapped.

Future goal(s): Sampling by the Lower Merrimack River Local Advisory Committee continues each year for the Merrimack River (see BMP 3-3). Sampling of the Ottarnic Pond is intended to be cataloged beginning in 2008 utilizing the Ottarnic Pond Association or Town staff.

Data for sensitive receptors will be organized and reviewed as a separate file.

BMP 6-2: Continue employee training program.

Responsible person(s): Department Heads.

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 Stormwater statewide conference in Merrimack, NH in January 2005.

Three training sessions were held with the Fire Department personnel in March 2005.

Future goal(s): Will expand education to other Town departments. We will provide additional training to the Highway Department in 2006/2007.

BMP 6-3: Sweep each street annually.

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. Monthly logs are being maintained.

A new more efficient street sweeper is in the DPW budget this year. Copies are provided periodically or the SWPPP file.

Future goal(s): Continue program.

BMP 6-4: Continue annual calibration of deicing compound applicators.

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 separate.

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 Police sally port, Highway Department and private vehicle wash facilities.

Future goal(s): Maintain process. Continue to educate personnel on vehicle washing regulations.

A follow-up self audit with follow-up training will be done in 2007.

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. This program will be expanded to municipally owned structural BMP's (BMP 5-4) once these have been identified.
Future goal(s):	Maintenance logs are being kept beginning spring 2004.

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 for developments and review documentation are on file at the Planning Department.
Future goal(s):	To continue inclusion as applicable. To add more emphasis through new regulations BMP 5-2, 4-2 & 3-2.

STORM WATER MANAGEMENT PROGRAM SCHEDULE (revised April 1, 2004)

	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	
1-3				X				X				X				X				X
1-4												X								X
1-5																				
1-6																				
2-1																				
2-2																				
2-3			X hotline set up																	
2-4																				
2-5				X																
2-6				X				X				X				X				X
3-1																95% complete				
3-2																	100% complete			
3-3																				
3-4																				
3-5	(new)																			
4-1																				
4-2																	100% complete			
4-3					Deleted															
4-4					Hotline setup															
4-5																				
4-6																				
5-1																				
5-2																	100% complete			
5-3	X																			
5-4																				
6-1																				
6-2																				
6-3																				
6-4				X				X				X				X				X
6-5																				
6-6																				
6-7																				
6-8																				