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MS 4 – ANNUAL REPORT
TOWN OF HUDSON, NH
PERMIT #NHR041013

NPDES – STORMWATER II

ANNUAL REPORT

MAY 1, 2004

(For work efforts through April 1, 2004)

I. Permit number NHR041013

II. Significant changes to the N.O.I. are as follows:

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

Responsible person(s):	Friends of Hudson Natural Resources/Robinson Pond Improvement Council.
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Measurable goal(s):	Distribute information to residence and maintaining Robinson Pond kiosk.
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Status:	This program has been ongoing since 2001 as part of the “Robinson Pond nonpoint implementation project” (also see new BMP 3-5)
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This program is funded through grants from the NHDES “small outreach and education grants program”.

Future goal(s):	Continue program. Files are kept at the Engineering office.
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B. A new BMP 1-6: “Implement Stormwater Committee” has been added.

This is being under taken because it has been apparent through the recent workshop “getting in step” that our Task I Public Education and Task 2 Public Participation efforts are disjointed. Most specifically with respect to BMP’s, 1-2, 1-3, 1-4, 2-3, 2-5, and 4-4.

The committee will form and develop its mission over the next 3 to 4 months. It is expected that this committee's effort will focus on tasks 1 & 2 and will provide input on other tasks.

Membership of this committee is intended to include Town employees (Director of Community Development, Town Planner, Town Engineer, and Civil Engineer/Site Inspector) Board of Selectmen liaison, and two citizen members.

- C. Revised implementation time schedules is also included. In many instances our original schedules were not realistic.
- D. A new 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 results are kept at the Engineering office.

III. Other notables:

A. Regional coordination group:

The Town engineer and Community Development Director have been attending a regional communities coordination meeting held at the Nashua Regional Planning Commission (NRPC). These meetings are held every 2 to 3 months.

B. Workshops:

The Town Engineer has attended 5 workshops regarding the NPDES-II program since June 2003. The Director of Community Development has attended 2, the Town Planner has attended 1, and the Town Civil Engineer/Site Inspector has attended 3.

We will continue to attend these workshops as they occur, and work to expand participation to other Town employees and officials.

C. Regional monitoring efforts Merrimack River:

The Merrimack River has been monitored for water quality at 5 specific sites along the Hudson Town line. This is done through the Lower Merrimack River Local Advisory Committee (IMRLAC) in cooperation with the NRPC.

The Town of Hudson will work towards coordinating with LMRAC through the NRPC to evaluate results of this monitoring and Hudson effect on such results. This will be worked toward BMP status for the next summer report (May 2005).

IV. Status of existing BMP's

Task 1. Public Education

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

Responsible person(s)	Responsibility has been shifted to the 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 have been updated to include storm water educational posters. This information has also been posted at the Town Hall in two locations. And has been given to a schoolteacher at H.O. Smith School for posting.
Future goals:	The above sites will be continued.

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

Responsible person(s):	Road Agent and Town Engineer.
Measurable goal(s):	Document information being distributed and schedule of distribution.
Status:	The original intent was to set up a booth and distribute information at the Towns Old Home Days. Based on discussions with the Conservation Commission it was noted that this venue is not the best to get information to community citizens. Therefore we are changing this task to be "Distribute Storm Water Quality and Environmental information on local access cable TV.
Future goal(s):	A video, prepared by the Seacoast Coalition is being scheduled to be aired this spring (2004). Other videos and information will be rotated in periodically will be shown about twice per year for 2 or 3 week period.

A consultant, Weston, & Sampson has been contracted with to produce new educational information. Other posters and information provided by the EPA and through regional coordination will be used. This will be changed in coordination with BMP 1-3.

(Also refer to new BMP 1-6).

BMP 1-3: Add Stormwater Quality Information to web page.

Responsible person(s): Director of Community Development.

Measurable goal: Document articles/information put on web page.

Status: Web page information is intended to be developed using information from EPA and NHDES and other community and regional sources. This effort has been delayed because of logistical and manpower issues.

Future goal: To add/change information at least annually after the initial posting.

(Also refer to new BMP 1-6).

BMP 1-4: Include Stormwater Quality Information in the Annual Town report.

Responsible person(s): Director of Community Development

Measurable goal(s): Provide two articles.

Status: The inspection of the NPDES-II Stormwater program was noted in the Engineering departments annual status report which is part of the Annual Town Report.

Future goal(s): In the year 2006 more defined educational information developed in BMP-1.1 & 1.2, & 1.3 above will be selectively included in this report.

(Also refer to new BMP 1-6)

Task –2 Public Participation

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

Responsible Person(s)	Road Agent
Measurable goal(s):	Seven hazardous waste collection days are held annually. Waste oil drop off is available at the Highway Garage during regular business hours (7:00am to 3:00pm).
Status:	Hazardous waste collection days are on the first Saturday of each month, April through November excluding July. The Town of Hudson’s local cable TV shows an announcement prior to each date. These dates are also announced through an informational mailing, published by the Town of Hudson Highway Department. Information is also on the Town website.
Future Goal(s):	This will continue each year.

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):	Twelve cleanup days.
Status:	In the same mailing noted for BMP-2-1 above the Town cleanup days are published. This mailing goes out to all Town residents. 12-days are scheduled.
Future goal(s):	Collection has been ongoing for many years and will continue.

BMP 2-3: Provide a hotline for public comments.

Responsible person(s): Director of Community Development

Measurable goal(s): Maintain web page hot line.

Status: Hotline not yet setup.

Future goal(s): A hotline will be announced through the web page "Storm Water." education section (BMP-1-3 above.) This will also be announced on local cable TV as part of BMP-1-2.

A telephone "Hotline" is also being set up to allow reporting of unproprieties (this was not part of the original storm water management plan.) A form has been developed and will be kept on file at he Community Development office to track-reported complaints and follow up actions. This effort has begun, but will be official once the hotline is advertised as part of BMP-1-2 & 1-3.

New time goal is fall 2004.

(Also refer to new BMP 1-6)

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. This continues weekly. The Hudson Highway Department keeps an ongoing log of collections. Copies of these are included in the SWPPP 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. Once the Stormwater Committee (BMP 1-6) is formed, the meeting dates will also be posted.

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:	The fact that a stormwater program is being implemented was stated in the Town annual report for the first in 2003. No comments were solicited because BMP 1-4 and 2-3 are still being implemented.
Future goal(s):	With the implementation of BMP 1-4 and 2-3 comments will be solicited and any comments received will be summarized and considered in the program continuation.

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 mapping to be completed.
Status:	We have entered contract with the Nashua Regional Planning Commission (NRPC) to complete a detailed drainage system overlay for our GIS mapping system. We have on file a watershed map also showing receiving waters. Potential future sampling points are identified (although we now understand sampling is not presently required.)
Future goal(s):	Drainage mapping through GPS will begin in 2004 and continue for 4-years. Outfalls will be identified by unique number and cataloged as part of this effort. Watershed map (noted above) will be cross-referenced to 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:	We have entered contract with our Planning board review consultants (CLD Consulting Engineers, Inc.) to draft changes to our ordinances to include appropriate bylaws. Given discussion at recent regional stormwater meetings and workshops (“Lets Talk Stormwater”) we are evaluating the

most appropriate level of bylaw development.

Future goal(s):

To draft bylaws or revisions to existing ordinances by December 2005. This has been delayed because of our evaluation. We would also if possible like to be consistent with other communities in our region.

(Also refer to BMP 1-6)

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 as part of drainage mapping BMP.3-1 above. This effort is getting underway this spring 2004.

There are two 303d impaired water bodies in Hudson. Ottarnic Pond and Merrimack River below Nashua River. These will receive priority for visual inspection.

Future goal(s):

Outfall inspections (visual) will begin summer 2005; we first must identify all outfalls. Inspection of all outfalls is expected to take 3-years.

Outfall inspection of Ottarnic Pond will be done this summer. (2004)

Outfall on Merrimack River we understand is being done through regional cooperation. We will bring this into discussion at the next regional meeting and help coordinate.

We anticipate showing steady programs of outfall reviews each year of implementation.

Future water quality testing is anticipated only if evidence of illicit discharges is noted.

The frequency of an ongoing inspection needs to be discussed regionally and with your office.

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 detention 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. Documentation should be implemented by beginning of 2005. It is intended that Sewer & Drain Department personnel will receive training this year (2004) to focus them on stormwater illicit discharge detection.

BMP 3-5: A new 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 results are kept at the Engineering office.

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 (BMP.3-2).

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

Responsible person(s): Town Engineer

Measurable goal(s): Draft and present bylaws.

Status: This effort is to be accomplished in conjunction with BMP 3-2 by the same consultant. Timing of effort is anticipated to coincide with BMP 3-2.

Future goal(s) To complete draft of bylaws in 2005.

(Also refer to BMP: 1-6)

BMP 4-3: Draft and present bylaws to require waste management plan.

Responsible person(s): Town Engineer & Road Agent

Status: This task has been postponed due to timing and manpower being diverted to other BMP's.

Future goal(s): We are re-evaluating the need for this BMP since we have all the elements of a waste management plan in place i.e., curb site collection and recycling by a contracted company, hazardous waste days, clean up, drop off days and oil disposal facilities.

BMP 4-4: Receive and consider public comment.

Responsible person(s): Maintain web page hotline for comments.

Status: Hot line not yet setup.

Future goal(s): This refers to BMP 4-3, which is being evaluated.

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

Responsible person(s): Town Engineer & Civil Engineer.

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 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 are now being requested.

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 and state permits (construction season 2004).

BMP 4-6: Enforce site permits and ordinances.

Responsible person(s):

Town Engineer, Civil Engineer, 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. This is being used.

Code enforcement letters are sent out by the engineering department and/or code enforcement officer. Records are kept at the

Community Development office. To date site enforcement letters and actions have focused on wetland buffer violations and sewer permit violations.

In spring of 2003 and spring of 2004 letters were sent to engineers, land planners, contractors and developers warning 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.

Upgrade to include new bylaws developed or improved as per this program. Continue to improve documentation.

(Also refer to BMP: 1-6)

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
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
Measurable goal(s):	Draft and present bylaws in spring 2004.
Status:	This is not yet drafted.
Future goal(s):	This will be developed in conjunction with BMP 3-2 and 4-2. It will follow just behind their timetable.

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 SWPPP.

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 will be done as part of BMP 3-1 and 3-3, mapping of out falls and drainage system.

Future goal(s): Over the 4-years remaining in implementation the cataloging will be accomplished.

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

Maintenance recommendations for privately owned structural BMP's will be communicated with reminders every 2-years once they are cataloged.

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:	Potential locations for future monitoring have been numerically identified by watershed and mapped (see BMP: 3-1). Specific sensitive receptors will be added to this list and map.
Future goal(s):	Add receptors to list and map (2004). Be ready to sample for water quality if necessary.

BMP 6-2: **Continue employee training program.**

Responsible person(s):	Road Agent
Measurable goal(s):	Continue annual training for sewer & drains personnel.
Status:	Personnel have ongoing training estimated to be 20 to 40 hours annually. This is standard operating procedure.
Future goal(s):	We have requested a proposal for consulting services to provide training specifically related to stormwater and good housekeeping. The first specialized training will be in 2004. As recommended at the "Getting in Step" workshop we will develop programs to expand education to other Town departments.

(Also refer to new BMP: 1-6)

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.

Future goal(s): Monthly logs are now being maintained. This will continue. Copies are to be provided periodically for the SWPPP file.

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.

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. Records are kept at the Highway garage.

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 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.

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	X	X	X
1-3																				
1-4				X				X				X				X				X
1-5 (new)																				
1-6 (new)																				
2-1																				
2-2																				
2-3				X																
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3-1																				
3-2																				
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3-5 (new)																				
4-1																				
4-2																				
4-3 Being re-evaluated																				
4-4 " " "																				
4-5																				
4-6																				
5-1																				
5-2																				
5-3 X																				
5-4																				
6-1																				
6-2																				
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																				