



City of Nashua

Public Works Division
165 Ledge Street
Nashua, NH 03060

Public Works
Division Director
(603) 589-3140
Fax (603) 589-3169

June 7, 2004

United States Environmental Protection Agency
Water Technical Unit
P.O. Box 8127
Boston, Massachusetts 02114

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**RE: City of Nashua, New Hampshire
2004 Annual Report MS 4 NPDES General Permit**

Dear Regulator:

Please find enclosed the 2004 Annual Report for the period March 2003 to April 2004 as required under the NPDES General Permit for Storm Water Discharges from Small Municipal Separate Storm Sewer Systems (MS4) for the City of Nashua, New Hampshire. Included in this report is:

- Part I. General Information
- Part II. Self-Assessment
- Part III. Summary of Minimum Control Measures
- Part IV. Summary of Information Collected and Analyzed
- Part V. Implementation Schedule.

Information supporting the report is included in Appendices A through E

Please contact this office if you should have any questions concerning this report.

Respectfully,

Richard S. Seymour, Jr., Director
Division of Public Works

enc: (1)

c: Jeffery Andrews, New Hampshire Department of Environmental Services
Stephen Dookran, P.E., City Engineer, Nashua DPW
Mario Leclerc, Superintendent, Nashua Wastewater Treatment Facility
Amy Prouty Gill, Nashua DPW

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Administration Business Office (603) 589-3140	Street Department (603) 589-4750	City Engineer (603) 589-3120	Parks-Recreation Department (603) 589-3370	Solid Waste Department (603) 589-3410	Traffic Department (603) 589-4700	Wastewater Treatment Plant (603) 589-3560
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**City of Nashua, NH
NPDES Phase II
Small MS4 General Permit
2004 Annual Report**

June 2004

**City of Nashua
Public Works Division
165 Ledge Street
Nashua, NH 03060
(603) 589-3120**

City of Nashua, NH
NPDES Phase II Small MS4 General Permit
2004 Annual Report

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Municipality/Organization: City of Nashua, NH

EPA NPDES Permit Number: _____

Annual Report Number

& Reporting Period: No. 1: March 03-April 04

NPDES Phase II Small MS4 General Permit Annual Report

Part I. General Information

Contact Person: Richard S. Seymour

Title: Director, Public Works Division

Telephone #: 589-3120

Email: seymourr@ci.nashua.nh.us

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: Richard S. Seymour, Jr.

Title: Director, Public Works Division

Date: June 2, 2004

Part II. Self-Assessment

The City of Nashua has completed the required self-assessment and has determined that our city is in compliance with all permit conditions, with the following exceptions.

Part I.B.2(e)(vi) The City of Nashua permit eligibility with regard to the Endangered Species Act was pending at the time of our NOI submission. The United States Department of Interior, Fish and Wildlife Service has since provided written determination that our MS4 discharges are not likely to jeopardize the continued existence of specific species protected under the Endangered Species Act. The NH Natural Heritage Inventory was also contacted and provided determination that our MS4 are not likely to jeopardize the continued existence of specific species protected under the Endangered Species Act. See **Appendix A** for both letters.

Part I.B.2(g) The City of Nashua contacted the NH Division of Historical Resources when planning the construction of a new outfall that would discharge to the Nashua River. The outfall is located in the Nashua Historical District. The NH Division of Historical Resources determined that this project could be construed as a finding of "No Historic Properties affected". See **Appendix A** for the correspondence on this issue.

Part II.F Failed to submit annual report by May 1, 2004. Report Submitted on June 1, 2004.

Part III. Summary of Minimum Control Measures

BMP ID#	Best Management Practice	Measurable Goal	Responsible Party	Progress on Goals - permit year 1 (reliance on non-municipal partners indicated, if any)	Planned Activities - Year 2
3.01	Map outfalls and waters of the United States in Nashua city limits	Complete by 11/04. Count number of outfalls identified	DPW - Amy Gill	New outfall at Canal Street added. Newly constructed drainage systems added. See Appendix C . Continued updating GIS maps based on field verifications of drainage systems and outfalls. NHDES continues to identify outfalls as a part of IDDE program.	Continue to update GIS maps based on field verification of outfalls.
3.02	Prepare an Illicit Discharge Detection and Elimination (IDDE) Plan	Complete final plan 10/04	DPW - Mario Leclerc	Compiling sample IDDE plans from other communities.	Complete IDDE Plan.
3.03	Review illicit discharge ordinance	Amend ordinance as necessary by 12/07	DPW - Mario Leclerc	Ordinance gathered. CDD(5) contacted. Informed that ordinance may need to be revised.	Inform Community Development Division (CCD)(5) of proposed future revisions.
3.04	Continue dry weather field survey of outfalls that was initiated by NHDES	Complete NHDES survey of outfalls. Locate other outfalls in water bodies not included in survey by 11/04	DPW - Amy Gill	NHDES submitted summary report to City Work done to date. Anticipated work to be completed by fall 2004	Follow up in areas where NHDES has
3.05	Conduct sampling of dry weather discharges and attempt to trace source of illicit discharge	Sample and identify source of suspect outfalls	DPW - Amy Gill	Suspicious water in catch basin that directly discharged to Mill Pond was sampled and tested. See Appendix E .	Sample suspect sources as needed.
3.06	Remove illicit discharges as budgetary funding allows	Track number of illicit discharges detected and removed	DPW - Mario Leclerc, Scott Pollock	Two suspect discharges tracked. Hospital had connection that was removed. Testing ongoing at suspect detention basin.	Continue testing and tracking suspect discharges.
3.07	Continue Regional Hazardous Waste Collection Day	Conduct 5 collection days per year	DPW - Sally Hyland, Solid Waste	Hazardous waste collection days held on 5/3, 6/5, 8/2, 10/4, and 11/1/2003. Event coordinated with the Nashua Regional Planning Commission (NRPC) and surrounding communities. See Appendix C .	Hazardous waste collection days scheduled for 5/1, 6/3, 8/7, 10/2, and 11/6/2004 for this year.
4.00 Construction Site Runoff Control					
4.01	Review procedure for site plan review to consider if potential water quality impacts are included	Complete review by Dec. 31 2005	DPW - Amy Gill	CDD(5) contacted. Informed that ordinance may need to be revised.	Begin review of ordinance.
4.02	Review requirements for construction operators to control demolition waste, chemicals, sanitary waste and other waste at the construction site	Complete review by Dec. 31 2005	DPW - Amy Gill	CDD contacted. Informed that ordinance may need to be revised.	Begin review of ordinance.
4.03	Review existing city ordinances (Sec 16-145) and modify as necessary	Make recommendations for improvements by June 2006. Proceed through internal process to change ordinance by Dec. 2007	DPW - Amy Gill	CDD contacted. Informed that ordinance may need to be revised. Applicable ordinances being gathered.	Begin review of ordinance.
4.04	Develop standard drawings of runoff prevention BMPs to be used by site developers	Produce document containing at least 7 alternative erosion protection measures by Dec. 2006	DPW - Amy Gill	No action taken on this item.	Gather sample drawings.
4.05	Review procedures for inspection of construction sites to see if BMPs are in place and functioning correctly	Complete review by Dec. 2006	DPW - Amy Gill	CDD contacted. Informed that ordinance may need to be revised.	Begin review of ordinance.
4.06	Review procedures for enforcement of improper functioning sediment and erosion control measures	Complete review by Dec. 2006	DPW - Amy Gill	CDD contacted. Informed that ordinance may need to be revised.	Begin review of ordinance.
5.00 Post Construction Runoff Control					

Part III. Summary of Minimum Control Measures

BMP ID#	Best Management Practice	Measurable Goal	Responsible Party	Progress on Goals - permit year 1 (reliance on non-municipal partners indicated, if any)	Planned Activities - Year 2
5.01	Review existing ordinance Sec. 16-145 which requires post development peak discharges be no greater than predevelopment discharges. Modify as necessary	Make recommendations for improvements by June 2006. Proceed through internal process to change ordinance by Dec. 2007	DPW - Amy Gill	CDD contacted. Informed that ordinance may need to be revised.	Begin review of ordinance.
5.02	Review ordinance Sec 16-145 for ground water recharge required on new site plans	Make recommendations for improvements by June 2006. Proceed through internal process to change ordinance by Dec. 2007	DPW - Amy Gill	CDD contacted. Informed that ordinance may need to be revised.	Begin review of ordinance.
5.03	Implement Annual Operations and Maintenance requirement for BMPs on private properties	Implement by Dec. 2007	DPW - Amy Gill	CDD contacted. Informed that ordinance may need to be revised.	Begin review of ordinance.
5.04	Develop enforcement measures and assign internal staff to enforce requirements	Implement by Dec. 2007	DPW - Amy Gill	CDD contacted. Informed that ordinance may need to be revised.	Begin review of ordinance.
6.00 Municipal Good Housekeeping					
6.01	Hazardous waste training program for applicable employees	Employees attend annual hazardous spill training program beginning May 2005	DPW - Mario Leclerc	No action taken on this item.	Begin Program development or selecting of outside program for DPW employees to attend
6.02	Storm water discharge training program for applicable municipal employees on preventing non-storm water discharges	Employees attend annual storm water discharge training program beginning May 2005	DPW - Mario Leclerc	No action taken on this item.	Begin Program development or selection of outside program for DPW employees to attend
6.03	Review program for handling fertilizer on city property	Complete review July 2005	DPW - Nicholas Caggiano, Amy Gill	Fertilization policy near wetlands reviewed.	Review policies with DPW Parks Department.
6.04	Continue litter management program by street sweeping downtown areas once a week	Review program annually	DPW - Scott Pollock	Program began on March 18, 2004 due to early snow melt. Article on City street sweeping published in the newspaper on April 12, 2004. See Appendix D.	Continue Street Sweeping
6.05	Review snow dumping procedure to allow snow storage in areas away from surface waters	Complete review July 2005	DPW - Scott Pollock	Program reviewed. Snow is stored in area where stormwater treatment is available before the snow is discharged to a water body.	Review Program
6.06	Continue city wide program to clean catch basins	100% of all catch basins cleaned once every 3 years	DPW - Mario Leclerc	Approximately 600 catch basin were cleaned.	Continue catch basins cleaning program.
6.07	Continue SSO(6) correction and mitigation program	Record number of SSOs that impacted drainage system or water bodies	DPW - Mario Leclerc	Three SSOs were reported that effected the drainage system that had eventual discharge to a water body. Correction and /or mitigation is reported for each incident. See Appendix D.	Continue recording number of SSOs.
6.08	Television inspection of storm drains as needed	Inspect as needed	DPW - Mario Leclerc	Approximately 1,600 LF of Storm Drain were inspected with the robotic camera.	Continue inspection needed.
6.09	Calibrate salt and sand truck spreaders	Complete annually before November 1st	DPW - Scott Pollock	Calibrated salt and sand trucks in November 2003.	Calibrate trucks in Fall 2004.
6.10	Review pooper scooper ordinance	Review ordinance by July 2005	DPW- Park Dept., Street Dept., Infrastructure Committee	Ordinance gathered.	Sample ordinances from other cities will be gathered.