



**NPDES Phase II - Small MS4 General Permit
Annual Report**

Organization: NH Department of Transportation (NHDOT)

EPA NPDES Permit Number: NHR043001

NHDOT Transmittal Number: N/A

**Annual Report Number
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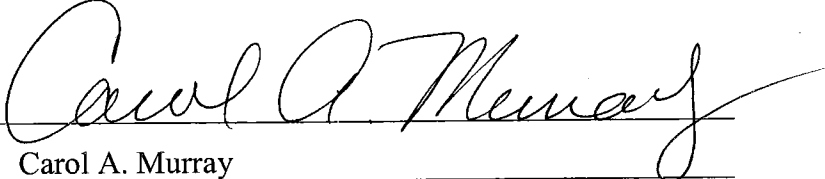
**NPDES Phase II MS4 General Permit
Annual Report**

Part I. General Information

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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: Carol A. Murray

Title: Commissioner, New Hampshire Department of Transportation

Date: _____

Part II. Self Assessment

The New Hampshire Department of Transportation (NHDOT) is committed to develop, implement and enforce a program to reduce the discharge of pollutants from the Department's regulated Small MS4s to the maximum extent practicable, with the goals of protecting water quality and satisfying the water quality requirements of the Clean Water Act and state water quality standards while providing a safe and efficient transportation system for the public.

Although resources during the second year of the permit term were limited by a challenging fiscal situation in the State, the NHDOT worked diligently to meet the majority of its storm water program commitments. During this second year, the NHDOT has continued to largely focus its efforts on Minimum Measure 1, which involves education and outreach efforts to train its employees and the general public on proper and effective management of storm water as required by the NPDES Phase II program requirements. The Department feels that this is the most important program measure, as it provides the necessary "knowledge infrastructure" that supports the remaining five measures (Minimum Measures 2-6). In the remaining years of the permit term, the NHDOT will continue to keep education in the forefront of its efforts, while increasing more technical efforts such as the mapping its storm water system outfalls, and adopting additional improved policies and procedures and Best Management Practices (BMPs).

Where possible, the NPDES Phase II Team has integrated staff from other functional areas of the NHDOT to assist on various teams, which are charged with implementing specific tasks of the Department's Storm Water Management Plan (SWMP). This has resulted in increased effectiveness in meeting its commitments, and has helped facilitate greater awareness of the need for proper storm water management across all NHDOT activities. In addition, the New Hampshire "team" approach has been beneficial to municipalities and non-traditional institutions, as it has helped to grow and strengthen working relationships with institutions that the Department is closely tied. For example, the NHDOT hosted numerous educational sessions for municipalities throughout the year, and it continues to attend and/or coordinate the four (4) New Hampshire regional storm water group meetings, Lakes Management Advisory Committee (LMAC) meetings and I-93 "Salt-ed" meetings. During the latter part of 2004, the NHDOT also began coordinating educational training sessions with The Associated General Contractors (AGC) of New Hampshire. The NHDOT expects this cooperative venture to greatly increase the awareness of issues that occur during the management of storm water on active construction sites throughout the state. The Department has also strengthened its rapport with the NHDES by working cooperatively with the agency on storm water issues and policy and procedure development, and also directly assisted the NHDES with storm water management related efforts such as illicit discharge detection and elimination.

In June 2004, a consulting firm (Vanassee Hangen Brustlin, Inc.) began assisting with many of the technical and administrative aspects of the program. VHB efforts include: interpreting and applying the NPDES Phase II regulations; finalizing the Storm Water Management Plan document (draft now complete); developing a task and timeline oriented Microsoft Project – based Action Plan; integrating with the NHDOT NPDES Phase II Team to

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manage and administer program tasks; and preparing this second year annual report. Services with the consulting firm are contracted for approximately two years.

The NHDOT has also relied on the support of a Colby-Sawyer student intern over the past year. She has assisted mainly with setting up education and outreach PowerPoint presentations and has helped prepare graphical materials for other storm water program outreach activities. The NHDOT will likely engage the assistance of other qualified student interns as the program moves forward.

In Fall 2004, the NPDES Phase II Team spent considerable time analyzing its current staffing and workload for the storm water program to determine whether it has adequate resources to carry out its responsibilities under NPDES Phase II. An outcome of this analysis indicated the need for additional staffing for the program going forward. It is envisioned that the additional staff member(s) (not yet approved) will focus largely on the water quality aspect of NHDOT projects, although he/she will assist with a variety of technical and administrative tasks specifically associated with the storm water program. The NPDES Phase II Team is hopeful that the fiscal climate in 2006 and beyond will allow the addition of new staff member(s) as the NHDOT embarks to accelerate its efforts in implementing the numerous BMPs committed to in its ambitious storm water management plan.

The NHDOT has completed this self-assessment and has determined that our agency is in compliance with all permit conditions with the exception of the following provision:

1. Public Education and Outreach – BMP #1H
Please refer to *page 11* of the report for an explanation.

Following is an update on the Small MS4 NOI Part IB and IC:

- **Section IB(5) Federally-Listed Species**

The NHDOT will continue to review discharges as they are identified during: storm water drainage inventory and mapping efforts; the illicit discharge and detection program (IDDE); and during the design phase of project development as part of the National Environmental Policy Act (NEPA) review process. The State of NH currently has no Federally-listed critical habitat based on consultation with the US Fish and Wildlife Service, (New England Field Office). The US Fish and Wildlife Service and the National Marine Fisheries Service have noted the short nosed sturgeon and the dwarf wedge mussel as two species of concern. These species have not been identified in any of the NH regulated Small MS4 communities. As noted in the "Response to Comments", page 4, no further consultation is necessary relative to EFH, unless duly noted.

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- **Section IB (6) Historic Properties/Places**

The NHDOT will continue to review discharges as they are identified during: storm water drainage inventory and mapping efforts; the IDDE program; and during the design phase of project development as part of the National Environmental Policy Act (NEPA) review process. The NHDOT regularly consults with the NH Division of Historical Resources (NHDHR a.k.a. SHPO) to locate and identify National Register of Historic Places listed or eligible properties.

- **Section IC Receiving Waterbodies**

As part of the Final Environmental Impact Statement (FEIS) prepared for the Salem-Manchester I-93 widening project, the NHDOT has identified the receiving water bodies of its storm water runoff along the highway corridor in the towns of Salem, Windham, Derry, Londonderry, and Manchester. The NHDOT has created a process whereby receiving water bodies are identified as part of the normal Bureau of Environment project review process. The NHDOT cannot list the waterbodies that receive storm water discharges from NHDOT-owned roadways in other locations within the regulated Small MS4 boundaries since the discharge locations have not yet been identified. The NHDOT does not anticipate having a complete list until the end of this first permitting term, and possibly into the second permitting term, due to the vast amount of outfalls associated with all NHDOT-owned roadways within the 45 regulated Small MS4 communities. As discharges are identified, they will be reviewed to determine if they discharge to a waterbody listed as impaired and/or with a TMDL. Evaluation of the receiving waters will reference the most current available data from the State TMDLs and 303(d) list. BMPs noted in Minimum Measure 3 will help us to catalog outfalls and identify illicit discharges during the first permit term.



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Part III. Summary of Minimum Control Measures

1. Public Education and Outreach

BMP ID #	BMP Description	Responsible Team/ Bureau Name	Measurable Goal	Progress on Goal(s) Permit Year 2 (2004-2005)
CURRENT PROGRAMS				
1A	Nonpoint Source Storm Water Display			
	Showcase the NHDOT Nonpoint Source Storm Water Table at 6 NH State Fairs annually, and other appropriate locations (e.g. schools)	Public Education and Outreach Team; Bureau of Highway Maintenance	Note the approximate number of individuals that attended the NHDOT booth, specifically the storm water table.	In May 2004, the table was demonstrated at the 17 th Annual Mountain of Demonstrations, where NHDOT and University of New Hampshire Technology Transfer (UNH T2) teamed to provide approximately 4 demonstrations to 200 Public Works employees and Road Agents from across the state. In Summer 2004, the storm water table was displayed at the six (6) major New Hampshire State Fairs, where it again generated much interest. In August 2004, State Planning and Research (SPR) funding was approved to upgrade the storm water table. Improvements include the ability to showcase actual NHDOT activities related to bridges, roadways, sand and salt operations, patrol sheds, and active

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BMP ID #	BMP Description	Responsible Team/ Bureau Name	Measurable Goal	Progress on Goal(s) Permit Year 2 (2004-2005)	Planned Activities Year 3 (2005-2006)
				construction sites. Examples of good BMPs will also be shown on the improved table.	
	Review current NHDOT performance questionnaire and update appropriately to elicit public opinion on storm water issues. Distribute at State Fairs.	Public Education and Outreach Team; Bureau of Highway Maintenance	Summarize the responses and track the number of responses received.	Performance questionnaire was distributed at storm water table displays to solicit public feedback on areas for improvement.	As time allows, review and update performance questionnaire.
1B	Meetings and Presentations with Professional, Private, and Public Organizations				
	NHDOT will continue providing appropriate presentations to both public and private organizations relative to storm water issues and the NPDES Phase II program. NHDOT will attend appropriate presentations/workshops.	Public Education and Outreach Team	NHDOT will prepare a conference report of the individual presentations/ meetings and will summarize the findings to EPA in the annual report. A total number of presentations/meetings and the target audience within the reporting year will be documented.	Presentations have been well received. A conference report of individual presentations and conferences is available upon request. See Appendix A for dates, topics and attendees.	Continue providing appropriate presentations to both public and private organizations.
	NHDOT will continue meeting with the surrounding New England states to coordinate programs and share information.	Public Education and Outreach Team	Meet at least annually. NHDOT will prepare a conference report of the individual meetings summarizing the topics discussed, materials distributed and follow-up on action items noted.	Cooperative efforts that involved other New England State Agencies provided the opportunity for collaboration on common issues and were informative and beneficial to all who attended. See Appendix B for dates, locations, and summary of meeting and conference topics.	Continue meeting and coordinating with other New England State Agencies to share information and efforts relative to storm water issues.
1C	Provide NHDOT employees training on storm water related issues and the NPDES Phase II				

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BMP ID #	BMP Description	Responsible Team/ Bureau Name	Measurable Goal	Progress on Goal(s) Permit Year 2 (2004-2005)	Planned Activities Year 3 (2005-2006)
	program				
	NHDOT will continue providing appropriate presentations to Department staff relative to storm water issues and the NPDES Phase II program.	Public Education and Outreach Team	NHDOT will prepare a conference report of the individual presentations/meetings and will summarize the findings to EPA in the annual report. A total number of presentations/meetings and the target audience within the reporting year will be documented. A follow-up on identified issues will be noted and required actions identified.	NPDES Awareness Training was conducted for approximately 25 Airport Managers and Sponsors on June 24, 2004. NPDES Awareness Training was also conducted for 30 Bridge Maintenance Superintendents and Foremen on October 6, 2004 and for 50 Bureau of Highway Design and Bureau of Bridge Design employees on March 8, 2005.	Continue providing training to Department Personnel. Modify training based on a review of the post-training surveys received from attendees. Public Education and Outreach Team will note the training needs and prioritize those needs for subsequent training sessions.
1D	Sponsor A Highway				
	Continue to support Sponsor A Highway program.	Bureau of Highway Maintenance; Bureau of Turnpikes	Quantity of roadside material collected	The NHDOT continues to support this program, which is tracked by the number of miles sponsored and number of bags of trash collected. Refer to Appendix C for program data. (Program data will be provided after the May 2005 cleanup efforts have been completed.)	NHDOT will continue supporting this program and providing annual data.
1E	Guidance Materials				
	Update current NPDES Phase II (Industrial Activities) guidance documents and evaluate the need for additional guidance.	Public Education and Outreach Team; Industrial Activities Team	Document the guidance document title and summarize the changes. Note any additional guidance materials that have been or will be developed.	"Guidance Materials for NPDES Phase II – Industrial Activities" is being used by all Maintenance Districts and Operations bureaus as an educational reference tool and for guidance in preparing SWPPPs. The	Industrial Activities team will continue to refine and adopt procedures, and provide employee training to implement standardized procedures statewide.

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BMP ID #	BMP Description	Responsible Team/ Bureau Name	Measurable Goal	Progress on Goal(s) Permit Year 2 (2004-2005)	Planned Activities Year 3 (2005-2006)
				NPDES Phase II Team has been reviewing facilities and SWPPPs in the field as time allows. Several Industrial Activities team meetings occurred during the second year to review procedures on vehicle fueling, heating oil, salt storage and good housekeeping BMPs and to finalize procedures for vehicle washing and registration. The need for additional guidance was noted, including procedures for salt brine collection, liquid de-icing products storage, and BMPs for the proper storage of stockpiled materials.	
	Develop an employee-training program that addresses the needs of the Multi-Sector General Permit associated with vehicle and/or equipment maintenance.	Public Education and Outreach Team; Industrial Activities Team	Document progress of the development of appropriate training tool and the number of staff that attended/viewed the training materials.	In conjunction with industrial activities procedure development, the teams discussed concepts for a staff-training program. It is currently envisioned that the NPDES teams will coordinate with the District and Bureau Safety and Environmental Coordinators to roll out a comprehensive training program.	Development of training tools and implementation of a training program will occur during the third year as procedures are finalized.
PROPOSED PROGRAMS					
1F	Develop Appropriate Media Campaign				
	Assess available media options	Public Education and	Note the various types of	Articles showcasing	NHDOT will continue

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BMP ID #	BMP Description	Responsible Team/ Bureau Name	Measurable Goal	Progress on Goal(s) Permit Year 2 (2004-2005)	Planned Activities Year 3 (2005-2006)
		Outreach Team	media options that were reviewed	NHDOT's efforts related to its storm water program appeared in several publications in 2004 including: "TRAC RECORD" – NH Career Day; "On the Move" – Storm Water Table at Three Rivers School, Pembroke; and "Rockingham News" – Presentation to the Southeast Regional Storm Water Committee communities.	providing opportunities to its personnel relative to education and outreach. The Education and Outreach Team will assess the use of additional media options to highlight Department efforts.
	Implement a media campaign based on research and the results obtained. Funding availability will be a limiting factor.	Public Education and Outreach Team	Implement an appropriate media campaign based on market research.	No data required until permit year 3.	Work with the NHDOT Public Information Officer for future press releases.
1G	Development of Enhanced Partnerships through Private and Public Organizations				
	Attend and host meetings with organizations within the regulated communities. Review "team" approach method of fulfilling the storm water regulations.	Public Education and Outreach Team	Document the number of meetings held and/or organizations attending.	NHDOT met regularly with four NH Regional Storm Water Groups. Meeting dates and groups include: Southeast Regional Storm Water Group (formerly known as Atkinson-Area Storm Water Group): June 25, 2004 August 26, 2004 October 29, 2004 December 3, 2004 February 4, 2005 April, 15, 2005 Amoskeag Regional	Continue meeting with the four (4) NH Regional Storm Water Groups to share information, discuss common issues of concern, and work toward mutually beneficial solutions.

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BMP ID #	BMP Description	Responsible Team/ Bureau Name	Measurable Goal	Progress on Goal(s) Permit Year 2 (2004-2005)	Planned Activities Year 3 (2005-2006)
				Communities Storm Water Assessment Team (ARC SWAT) (formerly known as Manchester-Area Storm Water Group): May 4, 2004 September 21, 2004 November 16, 2004 March 15, 2005 Nashua-Area Storm Water Coalition: May 12, 2004 June 14, 2004 September 8, 2004 November 10, 2004 December 8, 2004 (cancelled due to weather) January 12, 2005 (cancelled due to weather) February 9, 2005 Seacoast Storm Water Coalition: May 19, 2004 July 28, 2004 September 22, 2004 January 12, 2005 (cancelled due to weather) February 16, 2005 April 6, 2005 See Appendix A for the topics of each meeting.	
	Encourage and facilitate development of mutually beneficial partnerships. <i>Please note change in wording since original NOI submission.</i>	Public Education and Outreach Team	Number of partnerships formed.	NHDOT was instrumental in assisting with formation of a Statewide NH Regional Storm Water Group that met on November 30, 2004 and January 6, 2005 to discuss	NHDOT will continue to support the efforts of the statewide storm water group and AGC. It is anticipated that other partnerships will be formed, and existing

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BMP ID #	BMP Description	Responsible Team/ Bureau Name	Measurable Goal	Progress on Goal(s) Permit Year 2 (2004-2005)	Planned Activities Year 3 (2005-2006)
				organization of the first Statewide NH Regional Storm Water Group Annual Conference in September 2005. NHDOT was also successful in encouraging the development of an important partnership with the NH Association of General Contractors. Meetings occurred on August 31 and October 26, 2004 between NHDOT and AGC to discuss future collaborative efforts. Joint training sessions were held with AGC on February 24 and April 19, 2005. See BMP #4J for more information on the training sessions.	ones will be strengthened through these collaborative efforts.
1H	Grant Opportunities (formerly Transportation Enhancements Opportunities) <i>Please note name change since original NOI submission</i>				
	Review opportunities to apply for project grants to mitigate water quality impairments from roadway runoff. Program projects for this purpose to meet grant requirements.	NPDES Administration Team; Public Education and Outreach Team	Note the project type, location, and whether the committee selected the project. If project is selected, report on the status.	No suitable project was identified for submittal for TE funds for 2005. However, NHDOT is preparing a submission for SPR funds to produce an educational survey modeled after Maine Department of Environmental Protection focusing on current	NHDOT will continue to work toward identifying suitable projects and available funding sources.

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BMP ID #	BMP Description	Responsible Team/ Bureau Name	Measurable Goal	Progress on Goal(s) Permit Year 2 (2004-2005)	Planned Activities Year 3 (2005-2006)
				knowledge and attitudes about NPDES Phase II storm water issues.	
11	Special Events				
	Research the types of special events (ex. Earth Day, local fairs, Wild NH, etc) and determine appropriate involvement.	Public Education and Outreach Team	Note the event and the type of involvement from NHDOT. Note the number of events per year.	Throughout the second year, NHDOT focused its Public Education and Outreach efforts on formal internal and external training sessions related to the NPDES Phase II program in general, and to construction activities specifically. In support of its public education and outreach efforts, NHDOT displayed the storm water table at various NH State Fairs and reviewed other possible venues for its efforts.	NHDOT will continue to look for appropriate events in which to participate and will contact other events groups such as the Department of Agriculture, NH Fair Association, NH DRED and others.

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2. Public Participation and Involvement

BMP ID #	BMP Description	Responsible Team/ Bureau Name	Measurable Goal	Progress on Goal(s) Permit Year 2 (2004-2005)	Planned Activities Year 3 (2005-2006)
CURRENT PROGRAMS					
1D	Sponsor A Highway				
	Continue to support Sponsor A Highway program.	Bureau of Highway Maintenance; Bureau of Turnpikes	Quantity of roadside material collected.	The NHDOT continues to support this program, which is tracked by the number of miles sponsored and number of bags of trash collected. Refer to Appendix C for program data. (Program data will be provided after the May 2005 cleanup efforts have been completed.)	NHDOT will continue supporting this program and providing annual data.
2A	Stakeholders Meetings				
	Meet with the stakeholders responsible for the development of this NHDOT SWMP. These individuals are comprised of both NHDOT staff as well as individuals from other State Agencies and private professionals.	Public Education and Outreach Team; NPDES Administration Team	Meet at least annually to review the status and effectiveness of the SWMP. Review the identified BMPs for the upcoming year and provide input for the annual report.	NHDOT has developed a strong core NPDES Administrative Team to handle day-to-day oversight of the NHDOT storm water program. This group, consisting of the NPDES Phase II Project Manager, Bureau of Environment Administrator, NPDES Storm Water Coordinator, and an outside consultant meet regularly to discuss overall program management and administration, status of task accomplishment and current issues resolution. In addition to the main team, the Small MS4 Teams, i.e.: Public Education and	Meeting regularly, the NPDES Administrative Team and individual teams will continue to work toward accomplishing the goals and objectives set forth in the SWMP and will review and modify team assignments and actions as necessary.

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BMP ID #	BMP Description	Responsible Team/ Bureau Name	Measurable Goal	Progress on Goal(s) Permit Year 2 (2004-2005)	Planned Activities Year 3 (2005-2006)
				Outreach, Illicit Discharge Detection & Elimination, and Good Housekeeping & Pollution Prevention, Industrial Activities, and Construction, have been positioned to carry-out specific tasks outlined in the SWMP. These teams are also charged with "continuous process improvement" by reviewing their approach to task accomplishment and modifying it as necessary. Appendix D includes a listing of administrative and team meetings, including attendees and agendas.	
2B	Continue Cooperation/ Coordination Efforts with Regulated Municipalities				
	Continue meeting with regulated communities and work on the addition of regulated communities that NHDOT is not involved with currently. Meet at least annually with the communities either individually or as a group, to come up with an integrated approach to fulfilling the storm water program.	Public Education and Outreach Team	Aim for cooperative efforts with all of the regulated communities (municipalities, bordering states, and non-traditional). Document the number and summary of the meetings. Note how many new regulated communities are working with NHDOT.	NHDOT met regularly with each of the four (4) Regional Storm Water Groups on various storm water issues. Working closely with the groups, NHDOT has encouraged and helped development of a state watershed group (comprised of Chairs and Co-Chairs from the four groups) that works toward common storm water management goals and	NHDOT will continue to facilitate and attend and encourage close coordination of the storm water groups to share common goals and work on similar issues toward solutions that benefit the communities and NHDOT alike. The state watershed group will continue to meet during the year and work toward attracting Small MS4 communities who are

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BMP ID #	BMP Description	Responsible Team/ Bureau Name	Measurable Goal	Progress on Goal(s) Permit Year 2 (2004-2005)	Planned Activities Year 3 (2005-2006)
				themes. Meeting minutes are available upon request.	not yet represented.
2C	NHDOT Public Meetings				
	Continue providing public involvement with NHDOT projects through Public Officials and Public Informational Meetings, as well as Public Hearings. Engage the public in specific discussions of storm water management issues.	Public Education and Outreach Team; Bureau of Environment; Bureau of Highway Design	Coordinate with the Project Managers and document the number of public meetings that occurred within the regulated communities. Document any water quality issues that were brought to the Department's attention.	A new policy (dated February 9, 2005) was distributed to Bureau of Environment (BOE) staff to provide a procedure for soliciting input about water quality and storm water issues at public meetings. As appropriate, local storm water coordinators will be invited to public meetings to address storm water issues. With this policy, for which public notification is required, solicitation and discussion of storm water issues for projects not only within the regulated Small MS4 Communities, but also statewide is encouraged.	BOE will continue to solicit input at public meetings about water quality and storm water management aspects for all of its projects statewide.
	Update the environmental initial contact letters to public officials and other State Agencies to include inquiries about storm water issues and concerns	Bureau of Environment	Track responses.	By way of the February 9, 2005 policy, BOE personnel were instructed to modify initial contact letters to request the identification of water quality concerns with specific reference to NPDES Phase II storm water management. The new policy also provides a mechanism to follow-up with design and construction personnel	The BOE will continue to use these notification letters to local (including storm water coordinator), state, and federal officials to solicit water quality concerns. BOE will continue to follow-up with discussions with design and construction staff as needed. Environmental tracking form will be reformatted to include a

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BMP ID #	BMP Description	Responsible Team/ Bureau Name	Measurable Goal	Progress on Goal(s) Permit Year 2 (2004-2005)	Planned Activities Year 3 (2005-2006)
				should concerns be identified. Mechanism provides means to include consideration of temporary and permanent erosion control measures and potential right-of-way issues into project design.	specific reference to NPDES Phase II. Staff outside BOE will continue to be educated to be aware of the need for a water quality review on all projects located within Small MS4 communities.
	Request a copy of all regulated communities' Small MS4 NOIs in order to develop cooperative efforts to achieve the overall storm water goals.	NPDES Administration Team	List the communities in which NOIs were requested. Note communities that submitted their NOIs to NHDOT	The NHDOT has received reciprocal copies of NOIs from all NH Small MS4 communities.	N/A
	PROPOSED PROGRAMS				
2D	NHDOT Storm Water Website				
	Research currently available websites and determine the appropriate NHDOT website design. Meet with the Office of Information Technology (OIT) regarding the design and implementation.	Office of Information Technology; Bureau of Environment	Document meetings held and websites reviewed.	The Bureau of Environment recently received software to enable development of the BOE website. The developed site will include a storm water section that will provide a number of storm water program and NPDES Phase II documents and resources to NHDOT staff. During the previous year, budget constraints resulted in consolidation of NHDOT information technology resources into the OIT. Due to this consolidation, technical assistance from OIT is prioritized and somewhat constrained for new website development.	Development of the site will commence in the 3rd year of the permit term. As time allows, Bureau of Environment staff will work on making the "storm water" portion of the website interactive, informative and useful to Department personnel and the public.
	Implement the website.	Office of Information	Record the hits.	No action required until	N/A

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		Technology; Bureau of Environment		permit years 3-5.	
2E	Public Survey				
	Develop a community regional survey to assess needs and current programs within communities	Public Education and Outreach Team	Summarize the survey and determine what types of programs will need to be prepared in order to minimize or eliminate the issue(s) of concern.	In preparation for developing drainage mapping, NHDOT has drafted a survey to send to Small MS4s, which will be sent to communities once the survey has been approved. NHDOT is also preparing a submission for SPR funds to create a public education survey. See BMP #1H for more information. In addition, surveys were distributed at all public education and outreach training sessions. NHDOT uses surveys results to craft future training sessions.	As additional needs to solicit public input are identified, groups will be contacted and surveyed for participation.
1B	Meetings and Presentations with Professional, Private and Public Organizations				
	NHDOT will continue providing appropriate presentations to both public and private organizations relative to storm water issues and the NPDES Phase II program. NHDOT will attend appropriate presentations/workshops.	Public Education and Outreach Team	NHDOT will prepare a conference report of the individual presentations/ meetings and will summarize the findings to EPA in the annual report. A total number of presentations/meetings and the target audience within the reporting year will be documented	See Appendix A for dates, topics and attendees. Presentations have been well received. A conference report of individual presentations/conferences is available upon request.	Continue providing appropriate presentations to both public and private organizations.

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3. Illicit Discharge Detection and Elimination

BMP ID #	BMP Description	Responsible Team/ Bureau Name	Measurable Goal	Progress on Goal(s) Permit Year 2 (2004-2005)	Planned Activities Year 3 (2005-2006)
CURRENT PROGRAMS					
3A	Update Current Guidance				
	Review and update the driveway permit manual and incorporate storm water information and guidance into it.	Bureau of Highway Maintenance, Attorney General's Office	Announce the changes in the guidance document.	In late 2004, the <i>Illicit Discharge Detection and Elimination Team (IDDE)</i> drafted additional text for the driveway permit manual that references the NPDES Phase II storm water management program. The revised permit manual is currently being reviewed by the Bureau of Highway Maintenance and will be forwarded to the Attorney General's office for comment.	The driveway permit manual will be adopted with the revised language. Appropriate staff members will be notified of the changes. Those requesting driveway permits will receive updated manual.
	Review and update the approval letter to property owners in order to make connection to State-owned separate storm sewer systems. Provide wording to address storm water and illicit discharge.	Bureau of Highway Maintenance, Attorney General's Office	Announce the changes to the letter.	The IDDE Team is currently revising property owner approval letters.	Updated letters will be adopted with the revised language and will be used once approved.
PROPOSED PROGRAMS					
3B	Drainage Map				
	Map all drainage (outfall) conveyances within the regulated Small MS4 communities. Survey the regulated Small MS4 communities to determine their mapping status and data collection method. Prepare an RFP for mapping of drainage. Determine the cost and length of time to complete mapping for 45	Industrial Activities Team; Drainage Mapping Committee; Bureau of Environment; Bureau of Highway Design; Bureau of Transportation Planning	Survey the regulated Small MS4 communities.	NHDOT is continuing to work on developing a drainage map for all regulated Small MS4 communities. At a meeting held in Nov. 2004 to scope the level of required effort, and discuss options and strategies to develop mapping of NHDOT's Small	NHDOT will continue to work on mapping its drainage infrastructure. Where appropriate, NHDOT will use Small MS4 communities mapping information in developing its drainage mapping in Small MS4 communities. Based on the extensive amount

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	communities.			MS4s, it was determined that NHDOT <u>does not have</u> the funding to produce "stand alone" drainage mapping. At a follow-up meeting in Feb. 2005, a subcommittee was formed to determine needs and develop strategies to implement a system to integrate a GIS-based NPDES Phase II mapping layer, MATS and Asset Management Model and existing GIS mapping efforts. The sub-committee was tasked with identifying a pilot community in which to commence with drainage mapping in Summer 2005. A "Community Drainage Mapping Baseline Status Questionnaire" was drafted in January 2005 and is currently being reviewed by the IDDE Team prior to sending to Small MS4 communities. The technical questionnaire requests information on the type of mapping, level of effort and current status of community mapping. This information will assist NHDOT in coordinating their efforts with other community mapping efforts where	<i>of mapping needed and current funding challenges, the drainage-mapping project may not be completed until the second permit term.</i> Sample mapping to be produced by September 2005 will be evaluated to determine whether the approach will be appropriate for the remaining mapping efforts.

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BMP ID #	BMP Description	Responsible Team/ Bureau Name	Measurable Goal	Progress on Goal(s) Permit Year 2 (2004-2005)	Planned Activities Year 3 (2005-2006)
				systems meet. Information obtained from the survey and from the pilot mapping study will be used to provide the basis for developing an RFP to complete outfall mapping in the remaining Small MS4 communities.	
		Industrial Activities Team; Drainage Mapping Committee; Bureau of Environment; Bureau of Highway Design; Bureau of Transportation Planning	Document the communities that have mapping completed over the 5-year period.	Through conversations with FHWA, NHDOT learned that FHWA now considers the use of State Planning & Research funds appropriate for activities such as storm water system mapping.	NHDOT will investigate whether the pilot mapping project or another appropriate mechanism can be used to apply for FHWA funds for drainage mapping.
3C	Illicit Detection and Elimination Program				
	Determine a process to detect and eliminate illicit discharge and/or connections. Meet with local communities and other appropriate State Agencies to determine the best method. NHDOT will adopt an approved policy and procedural guideline and train personnel in its implementation.	Industrial Activities Team; Drainage Mapping Committee; Bureau of Environment; Bureau of Highway Design; Bureau of Transportation Planning	Document progress annually.	NHDOT has determined that drainage mapping component of Minimum Measure 3 logically will precede other components of the IDDE program. The IDDE team is working on incorporating the investigative portions of this program within the community pilot study area and eventually to all Small MS4 areas. During the course of the pilot study area investigations, any illicit discharges will be noted and corrected. To	Continue working toward a NHDOT IDDE policy and procedural guideline to address potential illicit connections within high priority MS4 areas first, eventually assessing all of NHDOT's facilities statewide. NHDOT anticipates assisting NHDES during the Summer 2005 with IDDE.

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BMP ID #	BMP Description	Responsible Team/ Bureau Name	Measurable Goal	Progress on Goal(s) Permit Year 2 (2004-2005)	Planned Activities Year 3 (2005-2006)
				learn first hand how other agencies are conducting IDDE, in Summer 2004, NHDOT worked with NHDES in the field investigating illicit discharges through direct observations at outfalls and by using smoke testing at various locations.	
	Develop a prioritization program to address areas of high complaint, public resources, drinking water sources, and coastal areas.	Industrial Activities Team	Develop a priority list and procedures.	A PDA application, Inventory of Miscellaneous Properties (IMP) for NPDES, is currently being developed by a consultant (Jacques-Whitford) to inventory patrol sites with regard to on-site storm water management, location of sensitive environmental resources and to provide a priority ranking mechanism for NHDOT maintenance facilities across the state. The facilities with the highest ranking will be prioritized for site improvements working toward "No Exposure". During the course of these investigations, illicit discharges (if any) will be identified and NHDOT will work to eliminate them.	NHDOT will work toward prioritizing the assessment of its Small MS4s (including those at patrol facilities). NHDOT will work toward drafting procedures to detect and eliminate illicit discharges (if any) within all Small MS4 communities in the state.
3D	Survey Bureaus of Highway Maintenance and Turnpikes				

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BMP ID #	BMP Description	Responsible Team/ Bureau Name	Measurable Goal	Progress on Goal(s) Permit Year 2 (2004-2005)	Planned Activities Year 3 (2005-2006)
	Personnel				
	Survey the District highway maintainers to determine the types of non-storm water materials entering the MS4s and Waters of the US.	Industrial Activities Team; Bureau of Highway Maintenance; Bureau of Turnpikes	Summarize the survey and determine what types of education and guidance documents will need to be prepared in order to minimize or eliminate the issue(s) of concern.	No action will be taken until year 3 of the permit term.	Survey the District highway maintainers.
1C	Provide NHDOT employees training on storm water related issues and the NPDES Phase II program				
	NHDOT will continue providing appropriate presentations to Department staff relative to storm water issues and the NPDES Phase II program.	Public Education and Outreach Team	NHDOT will prepare a conference report of the individual presentations/ meetings and will summarize the findings to EPA in the annual report. A total number of presentations/meetings and the target audience within the reporting year will be documented. <u>Required actions and follow-up will be identified and noted.</u>	NPDES Awareness Training was conducted for approximately 25 Airport Managers and Sponsors on June 24, 2004. NPDES Awareness Training was also conducted for 30 Bridge Maintenance Superintendents and Foremen on October 6, 2004 and for 50 Bureau of Highway Design and Bureau of Bridge Design employees on March 8, 2005.	Continue providing training to Department Personnel. Modify training based on a review of the post-training surveys received from attendees. Public Education and Outreach Team will note the training needs and prioritize those needs for subsequent training sessions.
1E	Guidance Materials				
	Update current NPDES Phase II (Industrial Activities) guidance documents and evaluate the need for additional guidance.	Industrial Activities Team	Document the guidance document title and summarize the changes. Note any additional guidance materials that have been or will be developed.	"Guidance Materials for NPDES Phase II – Industrial Activities" was distributed and is being used by all Maintenance Districts and Operations bureaus as an educational reference and for guidance in preparing	NHDOT will revise document to include updated BMPs and procedural guidelines to get to "no exposure". Also will be working to expand the guidance material to include contamination

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BMP ID #	BMP Description	Responsible Team/ Bureau Name	Measurable Goal	Progress on Goal(s) Permit Year 2 (2004-2005)	Planned Activities Year 3 (2005-2006)
				SWPPPs. NPDES Phase II Team has been reviewing facilities and SWPPPs in the field as time allows. The Industrial Activities team is currently drafting procedures on fueling, heating oil, salt storage and good housekeeping BMPs. The need for additional guidance includes developing procedures for salt brine collection, liquid de-icing materials storage, and stockpiled materials storage.	issues. Industrial Activities team will continue to refine procedures, provide employee training and work toward implementing the standardized procedures statewide.
	Develop an employee-training program that addresses the needs of the Multi-Sector General Permit associated with vehicle and/or equipment maintenance.	Public Education and Outreach Team; Industrial Activities Team	Document progress of the development of appropriate training tool and the number of staff that attended/viewed the training materials.	Procedure review and development continued in the second year.	Development of training tools by the Industrial Activities and Public Education and Outreach Teams once procedures have been finalized.

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4. Construction Site Runoff Control

BMP ID #	BMP Description	Responsible Team/ Bureau Name	Measurable Goal	Progress on Goal(s) Permit Year 2 (2004-2005)	Planned Activities Year 3 (2005-2006)
	CURRENT PROGRAMS				
4A	Erosion and Sedimentation Control Plan Review				
	Continue reviewing and commenting on, and approving the project-specific erosion and sedimentation control plans.	Construction Team; NPDES Administration Team	Review, update and document the results of the project-specific Field Reports.	NHDOT continued to work toward strengthening its construction site runoff control requirements. The Construction Team currently reviews and evaluates erosion and sedimentation plans on all NHDOT construction projects. Erosion and sedimentation control plans and SWPPPs for 37 individual projects were reviewed and tracked by using the Field Report forms. When plans were found to be inadequate, NHDOT worked with contractors to provide the correct information. NHDOT has also been educating contractors to submit SWPPPs with the plans in order to improve the process for E&S control review; contractors have begun to comply with the request. Specifications have been rewritten and were recently approved to formalize this requirement. See BMP #4G for additional information. NHDOT worked	The NHDOT will continue reviewing and evaluating erosion control plans and SWPPPs for completeness and appropriateness. Contractors who are not in compliance with the new submittal requirements will be notified

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BMP ID #	BMP Description	Responsible Team/ Bureau Name	Measurable Goal	Progress on Goal(s) Permit Year 2 (2004-2005)	Planned Activities Year 3 (2005-2006)
				with NH AGC and used this relationship to educate contractors about the new submittal requirements.	
			Track performance of erosion and sedimentation control plan designers.	NHDOT has sent a "Letter of Expectations and Goals" to E&S site monitors to make them aware of the need to evaluate the effectiveness of E&S BMPs in the field, to document ineffective practices, and to educate designers on potential problems with BMPs.	The NHDOT will continue to review erosion control measures in the field and evaluate their success or failure.
4B	Routine Roadway Maintenance Activities in NH				
	Provide training to the Division of Operations, and others as appropriate, relative to the document titled, "Routine Roadway Maintenance Activities in NH". Implement appropriate BMPs as noted therein.	Construction Team; NPDES Administration Team	Document the number of training sessions provided annually. Also note the audience and approximate number of attendees. Field review implementation of BMPs, noting successes and deficiencies	Training was provided to Maintenance Districts 3 and 4 on erosion and sedimentation control BMPs and the Permit by Notification (PBN) process. In this second year of the permit term, sixty-four (64) projects were reviewed submitted to NHDES using the PBN process.	Training on appropriate BMP implementation will continue in the Districts, as well as inspection and documentation of completed projects. New procedures will be reviewed as appropriate.
4C	Storm Water Management Erosion and Sedimentation Control Reference Manuals				
	Continue utilizing the storm water management erosion and sedimentation control manuals	Construction Team; NPDES Administration Team; Bureau of Highway Design	Review manuals and reference materials to ensure that they remain in compliance with all Federal and State regulations.	NHDOT is currently in the process of revising the "Construction Manual", which is the general guidebook for all	The NHDOT will continue to design and implement BMPs according to the best available information. The <i>Construction Team</i> will

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BMP ID #	BMP Description	Responsible Team/ Bureau Name	Measurable Goal	Progress on Goal(s) Permit Year 2 (2004-2005)	Planned Activities Year 3 (2005-2006)
				Department activities related to construction projects, including erosion and sediment control. The Department is also in the process of revising the manual "NHDOT Guidelines for Temporary Erosion and Sediment Control and Stormwater Management". Both documents will be brought into compliance with Federal and State regulations.	consider the need to consolidate and update the available information into a single document.
4D	Meetings with EPA Region 1 and NHDES				
	Meet with EPA Region 1 and NHDES at least annually to discuss water quality issues associated with construction-related activities.	NPDES Administration Team; Construction Team	Provide a conference report of the meeting agenda, attendees, points of interest and action items. Provide the conference report as an attachment to the annual report. Note changes as a result of meetings.	Events include a field review meeting with EPA/NHDES in August 2004 to review SWPPPs for active construction projects and a meeting in November 2004 with EPA to review the first Small MS4 Annual Report, discuss questions related to construction projects, etc. Meeting agendas and reports detailing action items are included in Appendix E.	NHDOT will continue to keep open communication with EPA Region 1 and NHDES relative to construction-related issues and will follow-up on questions that need further clarification and address new questions or issues that are raised. At the November 2004 meeting, EPA was invited and agreed to review additional construction projects in the field during the 2005 construction season.
4E	Project Design				
	Appropriate drainage will continue to be part of the transportation design phase. Review all projects	Public Education and Outreach Team; Bureau of Highway	Meet at least annually with the Environmental Managers and Project Managers to	Storm water awareness training was provided for 50 employees from the	Additional training sessions and updates from the appropriate teams will be

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BMP ID #	BMP Description	Responsible Team/ Bureau Name	Measurable Goal	Progress on Goal(s) Permit Year 2 (2004-2005)	Planned Activities Year 3 (2005-2006)
	currently in the design phase. Water quality improvements will be given great consideration.	Design; Bureau of Bridge Design; Bureau of Environment	discuss and document proposed projects as well as completed projects relative to water quality BMPs that will be or have been employed.	Bureaus of Bridge and Highway Design. Training topics included: general review of NPDES Phase II program; requirements of CGP permit; guidance for filing an NOI; preparation of SWPPPs; and structural and non-structural BMPs.	made annually. A training session is planned for Bureau of Bridge Design and Bureau of Highway Design employees in August 2005.
		Construction Team; Bureau of Environment; Office of Information Technology	Inventory installed BMPs.	Since utilization of MATS for NPDES has been delayed, inventorying of BMPs has not yet occurred. See BMP #5A for more information on MATS. Additionally, NHDOT is in the early planning stages of developing a module to be used with the Risk Assessment Survey for Contamination and Appraisal of Land (RASCAL) PDA application.	It is currently envisioned that MATS and/or RASCAL will continue to be developed for the purposes of inventorying and tracking BMPs that are installed on construction projects and for accounting for the various construction tasks that NHDOT employees perform in these activities. See BMP #4F for additional information.
PROPOSED PROGRAMS					
4F	Development of Database				
	Form a stakeholders group to discuss the needs of the database. Develop the database.	Construction Team; Bureau of Environment; Office of Information Technology	Provide annual updates. Database development will rely on the availability of OIT personnel.	Upon review of each of the existing database applications, the NPDES Team has determined that it would proceed to develop an NPDES-specific application for RASCAL to collect and report information. Preliminary discussions have occurred with a consultant (Jacques-	NHDOT will continue to work toward development of the NPDES/RASCAL database in 2005-2006, which will be used for a variety of assessment and tracking tasks such as: determining whether or not a project requires a NOI and SWPPP or is eligible for a waiver. For projects that

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BMP ID #	BMP Description	Responsible Team/ Bureau Name	Measurable Goal	Progress on Goal(s) Permit Year 2 (2004-2005)	Planned Activities Year 3 (2005-2006)
				Whitford) to develop the application.	require a SWPPP, the document will be made available on the RASCAL system.
4G	Specifications				
	Review the current specifications and compare to the 2003-2008 Construction General Permit (CGP). Make revisions as appropriate.	Construction Team; Specification Committee; Public Education and Outreach Team	Summarize findings and note revisions.	Construction specifications have been rewritten to meet current CGP requirements. Draft specifications were submitted to the Specification Committee for review and were approved in April 2005. New specifications require that SWPPPs be prepared by contractors and in place before ground disturbance occurs on a site. Updated specifications also require improved housekeeping measures on construction sites (which addresses an EPA concern). A new Special Attention was also drafted for contractors referencing NPDES Phase II requirements. This document will be included with construction contracts. NHDOT has forged a working relationship with NH AGC, to share information and ideas, run educational workshops and draft specifications that are mutually acceptable to both	Review the effectiveness of the newly revised specifications. Update other specifications (if necessary), which are pertinent to the current CGP. Submit revised specifications to the review committee for approval.

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BMP ID #	BMP Description	Responsible Team/ Bureau Name	Measurable Goal	Progress on Goal(s) Permit Year 2 (2004-2005)	Planned Activities Year 3 (2005-2006)
				NHDOT and the AGC.	
4H	Develop Public and Private Partnerships to Discuss Pertinent Construction Related Issues				
	Determine the appropriate stakeholders and meet on a regular basis to discuss construction related issues. Prioritize the issues and determine action items and responsible parties.	Construction Team; Public Education and Outreach Team	Document meetings, attendees and action items. Identify and prioritize action items in the annual report and note implementation of action items.	Reviewed environmental issues and erosion and sediment control measures with appropriate stakeholders during pre-construction meetings for all highway and bridge projects. NHDOT met with EPA and NHDES in August 2004 to review SWPPPs on active construction sites, and with in November 2004 to discuss construction-related questions and issues. NHDOT forged a new relationship with AGC to discuss common issues and collaborate on education and outreach efforts. (See BMP #1G for additional information.) Preliminary discussions have taken place with the NH Municipal Association to coordinate on NPDES Phase II activities.	The Construction Team will continue to work on developing partnerships to discuss construction related issues. Specifically, NHDOT will continue working with the NH AGC and the NH Municipal Association. As with other educational endeavors undertaken by NHDOT, the Department will utilize surveys to gage the effectiveness of its presentations and to solicit feedback on additional topics requiring training sessions.
4I	SWPPP Template				
	Prepare a template SWPPP that can be utilized by the Bureau of Highway Maintenance. Review the need for incorporation into Project	Construction Team	Provide status of the document. Make reference to the finalized document once it has been completed.	In late 2004, the NPDES Construction Team was tasked with reviewing available electronic SWPPP	NHDOT will continue to work toward developing a single standardized SWPPP template for use on all

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BMP ID #	BMP Description	Responsible Team/ Bureau Name	Measurable Goal	Progress on Goal(s) Permit Year 2 (2004-2005)	Planned Activities Year 3 (2005-2006)
	Development projects.		NHDOT will provide this document to the public and will note the estimated distribution.	templates and software, and documents prepared by consultants for specific projects for NHDOT, to find a suitable product from which to develop a standardized template SWPPP document. Ideally, this template will be used for Project Development and Operations projects as well as address the Small MS4 construction requirements.	construction projects undertaken by the Operations section where a SWPPP is required.
4J	Construction School				
	Provide the Bureau of Construction personnel with training or updates on storm water issues and/or NPDES Phase II issues.	Construction Team; Public Education and Outreach Team	Note the topic and questions addressed, and the number of personnel trained.	This year 's Construction School was held on January 27, 2005 and consisted of an interactive game show presentation modeled after the "Family Feud" television show. In the game, contract administrators were pitted against Construction Bureau Engineers and quizzed on their knowledge of the NPDES Phase II program. EPA and NHDES personnel in addition to dozens of Bureau of Construction employees were in attendance at the videotaped event. NHDOT presented at the AGC-hosted Storm Water Training Seminar on	Continue providing updates on NPDES-related issues annually at Construction School. Review the post-surveys from the NPDES Awareness training and determine what additional training is warranted. The Public Education and Outreach Team will take this into consideration as they prioritize the education and outreach needs of the Department.

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				February 24, 2005. This session focused on training for company owners and operators, contract administrators, and environmental consultants. Another second training session is scheduled with AGC for April 19, 2005 with training geared toward contract superintendents, site supervisors and foremen, and erosion control monitors.	
4K	ROW Constraints				
	Review the ROW constraints associated with temporary and permanent water quality control measures.	Bureau of Highway Maintenance; Bureau of Construction; Bureau of ROW;	Note findings and develop action plan.	NHDOT is in the early planning stages of developing a NPDES module to be used with the RASCAL PDA application during the construction process on projects, and for Development Inventory of Land (DEVIL) PDA application for surplus lands.	Continue to work with ROW on improving the current process of acquisition of property for storm water management. ROW issues (including storm water management) will be discussed at an upcoming Project Design workshop in August 2005.

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5. Post Construction Runoff Control

BMP ID #	BMP Description	Responsible Team/ Bureau Name	Measurable Goal	Progress on Goal(s) Permit Year 2 (2004-2005)	Planned Activities Year 3 (2005-2006)
	CURRENT PROGRAMS				
5A	Routine Maintenance				
	Continue current maintenance procedures (ex. culvert cleaning, street sweeping, etc)	NPDES Administration Team; Bureau of Highway Maintenance; Bureau of Turnpikes; Bureau of Bridge Maintenance	Input data into the MATS system and provide a summary on quantity maintained.	The MATS system is still being developed (See BMP #6A for additional information.) Ongoing discussions are occurring to determine how MATS will be integrated with the IMP and RASCAL PDA applications that are under development.	NHDOT will continue to work toward integrating drainage system components into MATS with the goal of utilizing MATS to have a real-time inventory of its drainage assets, maintenance frequency and scheduling, work activities, etc. Work will continue on integrating the PDA applications for IMP and RASCAL with MATS. The Department will continue to track and comment on the progress of the deployment status of MATS over the term of this several year effort.
5B	Routine Maintenance				
	Development and implementation of a BMP field manual to be utilized as a guide for maintenance and construction personnel.	Bureau of Highway Maintenance; Bureau of Construction; Bureau of Environment	Review existing NHDOT manuals, as well as other State Department's of Transportation manuals, and research the need to develop a durable pocket-sized field manual. Note research, findings and possible implementation of a new manual.	N/A	No action required until permit years 3-5.
5C	Review Process				

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BMP ID #	BMP Description	Responsible Team/ Bureau Name	Measurable Goal	Progress on Goal(s) Permit Year 2 (2004-2005)	Planned Activities Year 3 (2005-2006)
	Develop an internal review process to evaluate the effectiveness of water quality BMPs once construction has been completed.	Construction Team; Bureau of Highway Maintenance; Bureau of Construction	Establish an annual meeting to evaluate BMPs implemented on completed projects, evaluate their effectiveness, and implement procedural changes as necessary. Document and follow-up as required.	Although no action is required until permit years 3-5, NHDOT developed a field evaluation form to assess the performance of BMPs employed on a construction site. At the end of a project, the Contract Administrator completes the "Environmental Field Report" to assess whether project commitments were met, including the effectiveness of various erosion and sediment control BMPs.	This review process will continue to evolve to improve erosion and sedimentation control design and implementation on construction projects. NHDOT will be investigating the use of the NPDES module for the RASCAL PDA application (still under development) to track and report the BMP evaluation process.
4E	Project Design				
	Appropriate drainage will continue to be part of the transportation design phase. Review all projects currently in the design phase. Water quality improvements will be given great consideration.	Public Education and Outreach Team; Bureau of Highway Design; Bureau of Bridge Design; Bureau of Environment	Meet at least annually with the Environmental Managers and Project Managers to discuss and document proposed projects as well as completed projects relative to water quality BMPs that will be or have been employed.	Storm water awareness training was provided for 50 employees from the Bureaus of Bridge and Highway Design. Training topics included: general review of NPDES Phase II program; requirements of CGP permit; guidance for filing an NOI; preparation of SWPPPs; and structural and non-structural BMPs.	Additional training sessions and updates from the appropriate teams will be made annually. A training session is planned for Bureau of Bridge Design and Bureau of Highway Design employees in August 2005.
		Construction Team; Bureau of Environment; Office of Information Technology	Inventory installed BMPs	Since utilization of MATS for NPDES has been delayed, inventorying of BMPs has not yet occurred. See BMP #5A for more information on MATS. Additionally, NHDOT is in the early	It is currently envisioned that MATS and/or RASCAL will continue to be developed for the purposes of inventorying and tracking BMPs that are installed on construction projects and for



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				planning stages of developing a module to be used with the Risk Assessment Survey for Contamination and Appraisal of Land (RASCAL) PDA application.	accounting for the various construction tasks that NHDOT employees perform in these activities. See BMP #4F for additional information.

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6. Pollution Prevention / Good Housekeeping

BMP ID #	BMP Description	Responsible Team/ Bureau Name	Measurable Goal	Progress on Goal(s) Permit Year 2 (2004-2005)	Planned Activities Year 3 (2005-2006)
	CURRENT PROGRAMS				
6A	Environmental Management System (EMS - ISO 14001)				
	Implement EMS Department wide.	Bureau of Environment	Note the Bureaus that have implemented the program in addition to upcoming ones	N/A	No action required until permit years 4-5.
6B	Managing Assets for Transportation Systems (MATS) <i>Note name change since original NOI submission.</i>				
	Implement MATS.	Bureau of Highway Maintenance; NPDES Admin. Team; Office of Information Technology; Finance and Contracts Administrator	Identify storm water management components and note implementation date	The MATS system was deployed throughout the Division of Operations as of June 16, 2004 to report all work activities based on existing stable asset inventories (which currently includes only roads and bridges). It is anticipated that all of NHDOT will be using MATS by FY 2006 (July 1, 2005) to report all current activities. Unanticipated problems with integrating different payroll systems into MATS and the lack of inventoried drainage system components (pipes, culverts, ditches, etc.), has delayed the use of MATS for the purposes of tracking "NPDES-related" assets.	NHDOT will continue to work toward integrating drainage system components into MATS with the goal of utilizing MATS to have a real-time inventory of its drainage assets, maintenance frequency and scheduling, work activities, etc. NHDOT is also investigating how to integrate the NPDES modules for IMP and RASCAL with MATS. The Department will continue to review and comment on the deployment status of MATS.
6C	Roadside Litter Removal Program				

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BMP ID #	BMP Description	Responsible Team/ Bureau Name	Measurable Goal	Progress on Goal(s) Permit Year 2 (2004-2005)	Planned Activities Year 3 (2005-2006)
	Removal of roadside litter by all NH Maintenance Districts and Turnpikes.	Bureau of Highway Maintenance; Bureau of Turnpikes	Summarize quantity of material removed by Department personnel.	Roadside litter removal is part of the NHDOT maintenance program and is done throughout the year. Actual quantities of material are not typically calculated.	Continue removing roadside litter by all Maintenance Districts and Turnpikes. If staffing resources allow, NHDOT will investigate a method for calculating the quantities of material that is removed by Department personnel.
1D	Sponsor A Highway				
	Continue to support Sponsor A Highway program.	Bureaus of Highway Maintenance; Bureau of Turnpikes	Quantity of roadside litter collected.	The NHDOT continues to support this program, which is tracked by the number of miles sponsored and number of bags of trash collected. Refer to Appendix C for program data. (Program data will be provided after the May 2005 cleanup efforts have been completed.)	NHDOT will continue supporting this program and providing annual data.
6D	Coastal Cleanup				
	Continue to support the annual Coastal Cleanup Program.	Bureau Highway Maintenance	Document the assistance provided.	NHDOT District 6 continues to employ this program. District 6 employees coordinate the "groups" and collect the bags of litter left along the roadside. This cleanup occurs along the NH Route 1 corridor annually.	Continue sponsoring this program.
6E	Water-based Paints				
	Continue the use of waterbased traffic paint.	Bureau of Traffic	Document the number of painted miles. Revision: Document in feet.	83,601,912 ft of 4" line was painted during the April – November 2004 work season.	Document the number of 4" line painted feet.

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			Note disposal method of traffic paint.	During FY 2004, 8,250 gallons of paint were recycled by the treatment system at a cost of \$14,917.75. If sent to a contractor/landfill, cost would have been \$39,750. Resultant cost avoidance (net cost savings) equals \$24,832.25. Waste by-product from the system is recycled at no additional cost to State, although difficulties continue to be encountered in trying to get vendors to provide maintenance on treatment system.	Continue noting disposal methods and associated costs.
4E	Project Design				
	Appropriate drainage will continue to be part of the transportation design phase. Review all projects currently in the design phase. Water quality improvements will be given great consideration.	Public Education and Outreach Team; Bureau of Highway Design; Bureau of Bridge Design; Bureau of Environment	Meet at least annually with the Environmental Managers and Project Managers to discuss and document proposed projects as well as completed projects relative to water quality BMPs that will be or have been employed.	Storm water awareness training was provided for 50 employees from the Bureaus of Bridge and Highway Design. Training topics included: general review of NPDES Phase II program; requirements of CGP permit; guidance for filing an NOI; preparation of SWPPPs; and structural and non-structural BMPs.	Additional training sessions and updates from the appropriate teams will be made annually. A training session is planned for Bureau of Bridge Design and Bureau of Highway Design employees in August 2005.
		Construction Team; Bureau of Environment; Office of Information Technology	Inventory installed BMPs.	Since utilization of MATS for NPDES has been delayed, inventorying of BMPs has not yet occurred. See BMP #5A for more information on	It is currently envisioned that MATS and/or RASCAL will continue to be developed for the purposes of inventorying and tracking BMPs that are

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				MATS. Additionally, NHDOT is in the early planning stages of developing a module to be used with the Risk Assessment Survey for Contamination and Appraisal of Land (RASCAL) PDA application.	installed on construction projects and for accounting for the various construction tasks that NHDOT employees perform in these activities. See BMP #4F for additional information.
	PROPOSED PROGRAMS				
6F	No Exposure Certification				
	Aim towards a "No Exposure Certification" at all NHDOT sites within the regulated Small MS4 's noted as an industrial activity.	Industrial Activities Team	Document the number of facilities that were able to obtain a "No Exposure Certification" annually.	Although the NHDOT patrol shed facilities are not formally regulated under the General Permit for Industrial Activities, the NHDOT completed a state-wide status review of each of the patrol sheds in an effort to be good stewards of the environment and to streamline practices across the six Districts, which is located in Appendix F . These summary sheets indicate by District or Bureau whether a facility is "not in program", is exempted because of "no exposure" or "requires SWPPP" because site modifications need to be made. If a site requires a SWPPP, the site improvements needed to bring a facility to the status	Will continue to work towards certification at the remaining patrol shed locations with emphasis on those in priority areas. The Industrial Activities Team will continue to work on the Vehicle Washing and other procedures and develop a training program prior to implementation.

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BMP ID #	BMP Description	Responsible Team/ Bureau Name	Measurable Goal	Progress on Goal(s) Permit Year 2 (2004-2005)	Planned Activities Year 3 (2005-2006)
				of No Exposure are indicated. As emphasized by the Small MS4 permit, the sheds that are located within Urbanized Areas and have nearby sensitive environmental resources i.e. public water supplies, TMDLs, and public beaches will be prioritized for site improvements leading to improvements in storm water quality discharges. Priority improvements will be assessed by using the NPDES application for IMP, which is currently under development (see BMP#3C).	
6G	Water Quality BMPs				
	Incorporate water quality BMPs in all NHDOT activities, to the maximum extent practicable, in order to reduce or eliminate pollutant sources.	Construction Team; Industrial Activities Team; NPDES Admin. Team; Bureau of Highway Design; Bureau of Environment	Note the number of project orange or green sheets that were reviewed and located within the regulated Small MS4 communities.	Six NHDOT construction projects were reviewed specifically for water quality concerns. This is a three-fold increase over the 1st year of the permit term. Specific water quality improvement BMPs were recommended by Bureau of Environment staff for these projects. In addition, specifications are being reviewed and modified to allow greater flexibility by contractors in employing water quality BMPs on	NHDOT is working toward using the RASCAL PDA application to report NPDES-related information. This application will allow the Department to track the implementation and effectiveness of various water quality BMPs.

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BMP ID #	BMP Description	Responsible Team/ Bureau Name	Measurable Goal	Progress on Goal(s) Permit Year 2 (2004-2005)	Planned Activities Year 3 (2005-2006)
				projects. Projects located within regulated Small MS4 communities were reviewed with the environmental coordinators and suggestions were made relative to water quality BMPs.	
	Incorporate water quality BMPs in all NHDOT activities, to the maximum extent practicable, in order to reduce or eliminate pollutant sources.	Bureau of Bridge Maintenance; Bureau of Turnpikes; Bureau of Highway Maintenance; NPDES Administration Team	Meet at least annually with representatives from the Division of Operations to review current practices and recommend changes as appropriate.	Bureau of Highway Maintenance and Maintenance Districts employees meet monthly to discuss various operational issues including storm water.	Will continue to meet with the Districts to determine effectiveness of BMPs. The NPDES Teams will continue to provide assistance to the Maintenance Districts as requested. The Public Education and Outreach Team will be developing a training program on water quality BMPs specifically for Division of Operations staff.
6H	Winter Maintenance Activities				
	Review current procedures and determine ways to reduce the environmental impacts. Implement new procedures and/or technologies.	Commissioner's Office, Bureaus of Highway Maintenance, Turnpikes and Environment	Document research and meetings. Document current practices and make recommendations relative to new technologies. Meet with appropriate Department, State, Federal, and local agencies to review current deicing procedures. Track implementation, specifically reduction in pollutants	As part of the commitments agreed to in the I-93 Final Environmental Impact Study for public education and outreach, NHDOT began meeting regularly in small and large groups ("Salt-ed" groups) in May 2004 to discuss issues related to road salt use along the I-93 corridor communities. A listing the meeting dates/times/topics is included in Appendix G. A major accomplishment of	NHDOT will evaluate the data from the pilot study and review other ways that it can reduce the use of road salt on its highways. If it deems the pilot study a success, the Department will expand the use of brine solution to other roadways such as the F. E. Everett Turnpike. NHDOT will continue to provide annual training and report on the status of its efforts to reduce the impact of winter salt usage on the

NPDES Phase II - Small MS4 General Permit Annual Report

BMP ID #	BMP Description	Responsible Team/ Bureau Name	Measurable Goal	Progress on Goal(s) Permit Year 2 (2004-2005)	Planned Activities Year 3 (2005-2006)
				these meetings was that NHDOT commenced with a program to review its current use of rock salt (sodium chloride) in the maintenance of its highways during the winter months and find methods to reduce salt usage. During the winter 2004-2005, the Department rolled out a \$480,000 pilot study project on I-93 between Salem and Manchester and along Route 101 in the vicinity of Manchester. A goal of the project is to reduce the amount of salt use by up to 40% by pre-treating road surfaces with a 23% brine solution made from solar salt. The brine works by preventing the build-up of an ice layer which bonds with pavement during some snow events. NHDOT also demonstrated its salt brine pilot program to federal and state agency personnel and has issued press releases in an effort to maintain a proactive public education and outreach campaign about the use of road salt on highways and the effect it has on the environment.	environment.

NPDES Phase II - Small MS4 General Permit Annual Report

BMP ID #	BMP Description	Responsible Team/ Bureau Name	Measurable Goal	Progress on Goal(s) Permit Year 2 (2004-2005)	Planned Activities Year 3 (2005-2006)
				As part of the proposed Salem to Manchester I-93 widening project, two road stations are planned for the highway corridor, one located near Salem and the second located north of Manchester. These stations will tie into a larger regional network, i.e. RWIS to track and give early warning of adverse weather as it moves into the region.	Report on the status of RWIS.
3C	Illicit Detection and Elimination Program				
	Determine a process to detect and eliminate illicit discharge and/or connections. Meet with local communities and other appropriate State Agencies to determine the best method. NHDOT will adopt an approved policy and procedural guideline and train personnel in its implementation.	Industrial Activities Team; Drainage Mapping Committee; Bureau of Environment; Bureau of Highway Design; Bureau of Transportation Planning	Document progress annually.	NHDOT has determined that drainage mapping component of Minimum Measure 3 logically will precede other components of the IDDE program. The IDDE team is working on incorporating the investigative portions of this program within the community pilot study area and eventually to all Small MS4 areas. During the course of the pilot study area investigations, any illicit discharges will be noted and corrected. To learn first hand how other agencies are conducting IDDE, in Summer 2004, NHDOT worked with	Continue working toward a NHDOT IDDE policy and procedural guideline to address potential illicit connections within high priority MS4 areas first, eventually assessing all of NHDOT's facilities statewide. NHDOT anticipates assisting NHDES during the Summer 2005 with IDDE.

NPDES Phase II - Small MS4 General Permit Annual Report

BMP ID #	BMP Description	Responsible Team/ Bureau Name	Measurable Goal	Progress on Goal(s) Permit Year 2 (2004-2005)	Planned Activities Year 3 (2005-2006)
				NHDES in the field investigating illicit discharges through direct observations at outfalls and by using smoke testing at various locations.	
	Develop a prioritization program to address areas of high complaint, public resources, drinking water sources, and coastal areas.	Industrial Activities Team	Develop a priority list and procedures.	A PDA application, Inventory of Miscellaneous Properties (IMP) for NPDES, is currently being developed by a consultant (Jacques-Whitford) to inventory patrol sites with regard to on-site storm water management, location of sensitive environmental resources and to provide a priority ranking mechanism for NHDOT maintenance facilities across the state. The facilities with the highest ranking will be prioritized for site improvements working toward "No Exposure". During the course of these investigations, illicit discharges (if any) will be identified and NHDOT will work to eliminate them.	NHDOT will work toward prioritizing the assessment of its Small MS4s (including those at patrol facilities). NHDOT will work toward drafting procedures to detect and eliminate illicit discharges (if any) within all Small MS4 communities in the state.

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Appendix A

***BMP #1B(a) – Meetings and Presentations with Professional,
Private, and Public Organizations***

***BMP #1G – Development of Enhanced Partnerships Through
Private and Public Organizations***

Appendix A

BMP #1B(a) – Meetings and Presentations with Professional, Private, and Public Organizations

BMP #1G – Development of Enhanced Partnerships Through Private and Public Organizations

NHDOT will continue providing appropriate presentations to both public and private organizations relative to storm water issues and the NPDES Phase II program and will attend appropriate conferences and seminars related to storm water management.

DATE	PURPOSE/TOPICS	AUDIENCE
May 4, 2004 (attend)	Discussion of NPDES issues	Manchester-area Storm Water Group
May 12, 2004 (attend)	Discussion of NPDES issues	Nashua-area Storm Water Group
May 19, 2004 (host)	Discussion of NPDES issues	Seacoast Coalition Storm Water Group
May 27, 2004 (demonstration of NHDOT storm water table)	17 th Annual Mountain of Demonstrations: Deb Loiselle (NHDOT and Dave Fluharty UNHT2 provided approximately 40 demonstrations to 200 individuals from across NH.	Municipal DPW and Road Agents from New Hampshire
June 24, 2004 (host/present)	NPDES Awareness Training	NH Airport Managers and Sponsors (25 attendees)
June 25, 2004 (attend)	Discussion of NPDES issues	Atkinson-area Storm Water Group
July 14, 2004 (attend)	Discussion of NPDES issues	Nashua-Area Storm Water Group
July 28, 2004 (host)	Discussion of NPDES issues	Seacoast Coalition Storm Water Group
Summer 2004	Article in "TRAC RECORD"	Article on NH career day by Deborah Loiselle
Summer 2004	Article in "On The Move" NHDOT newsletter (Summer)	Updated Erosion Control and Stormwater Management Policy Issued on Earth Day and Deborah Loiselle showcasing the storm water table to students from the Three Rivers School in Pembroke, NH during a career day hosted by NHDOT
August 26, 2004	Discussion of NPDES Issues	Southeast Regional Storm Water Group (formerly known as Atkinson-area Storm Water Group)
August 27, 2004	Monthly Meeting –	Lakes management

	Sunapee Lake Water Quality Monitoring Program	Advisory Committee (LMAC)
August 31, 2004	Meeting with AGC Executive Vice President to discuss future collaborative efforts with the AGC and NHDOT	AGC
September 8, 2004	Strategic plan for a "group" project	Nashua-Area Storm Water Group
September 16, 2004	NHDOT presentation to area-selectmen relative to NPDES Small MS4 requirements and collaborative efforts with area Small MS4 communities (communities with the Southeast Regional Storm Water Committee)	Communities represented: Hampstead, Sandown, Kingston, Plaistow, ? (see September 24, 2004 Rockingham News article)
September 21, 2004	I-93 Widening pre-education discussion with storm water coordinators	Communities represented: Derry, Hudson, Londonderry, Manchester, Salem, and Windham Presentation: NHDOT, NHDES and EPA Region 1
September 21, 2004	Bi-monthly meeting	Manchester-area Storm Water Group
September 22, 2004	Bi-monthly meeting	Seacoast Storm Water Coalition
September 24, 2004		LMAC Meeting
September 29, 2004	Anti-Icing Workshop	Deb Loiselle (NHDOT), FHWA, EPA and municipal foremen
October 6, 2004	Environmental Training: Dredge and Fill Application and Permits, Best Management Practices for Construction Sites and NPDES Awareness (emphasis on Industrial Activities)	Bureau of Bridge Maintenance: All Superintendents & Foremen, Administrator and Managers (30 attendees)
October 26, 2004	NHDOT past, present and future tasks/training to address the NPDES-CGP	NH Associated General Contractors (AGC) – Executive Vice President, Education Coordinator and Environmental Committee
October 29, 2004	Bi-monthly meeting	Southeast Regional Storm Water Committee
November 4, 2004	Division of Operations Staff	Jim Colburn, Bill Hauser,

	Meeting – provide overview of NPDES requirements and status of program	Deb Loiselle and Jake Tinus (VHB)
November 10, 2004	Strategic plan for a “group” project – continued discussion on storm water educational program that will be aired on cable TV stations.	Nashua-Area Storm Water Group (NHDOT unable to attend)
November 15, 2004	Annual meeting with EPA – Region 1 to review and discuss the 1 st Small MS4 Annual Report and discuss remaining construction – related questions	EPA – Region 1 (Thelma Murphy) and NHDOT (Jim Colburn, Deb Loiselle and Jake Tinus)
November 16, 2004	Discussion of NPDES issues	Manchester-area Storm Water Group
November 19, 2004		Lakes Management Advisory Committee (LMAC) Meeting
November 30, 2004	Meeting to discuss first annual NH Regional Storm Water Group Conference	Chairs, Co-Chairs of 4 NH Regional Storm Water Groups and NHDES
December 3, 2004	Brainstorm long-term NPDES action plan	Southeast Regional Storm Water Group (formerly known as Atkinson-area Storm Water Group)
December 8, 2004	CANCELLED	Nashua-Area Storm Water Group
December 14 and 15, 2004	Clean Water Act 101: A Comprehensive Guide to Water Quality Policy and Protection (NEIWPCC)	
December 21, 2004	Discussion of surplus land disposal adjacent to lakes	LMAC Meeting
January 6, 2005	Meeting to discuss first annual NH Regional Storm Water Group Conference; Prepare “draft” agenda and discuss logistics (date, time, place, audience, etc.)	Chairs, Co-Chairs of 4 NH Regional Storm Water Groups and NHDES
January 12, 2005 CANCELLED due to bad weather	Continue discussion of the regional project	Nashua-Area Storm Water Group
January 12, 2005 CANCELLED due to bad weather – rescheduled for February 16, 2005	Guest Presenters: David Ladd (MDEP) and Randee MacDonald (Aquarion Engineering, Inc.)	Seacoast Storm Water Coalition
January 14, 2005	A “How To” Workshop for Storm Water Phase II Communities – Developing	Small MS4 communities, DOT, and non-traditionals (Deb Loiselle - NHDOT)

Appendix B

***BMP #1B(b) – Meetings and Presentations with Professional,
Private, and Public Organizations***

	Construction and Post-Construction Programs	attended)
January 27, 2004	Family Feud ("game show" presentation featuring questions on NPDES Phase II and NHDOT efforts)	Construction School
January 21, 2005	A "How To" Workshop for Storm Water Phase II Communities – Developing Construction and Post-Construction Programs	Small MS4 communities, DOT, and non-trationals (Ron Crickard - NHDOT attended)
February 4, 2005	Discuss "team" goals for 2005	Southeast Regional Storm Water Committee
February 9, 2005	Continue discussion of regional project	Nashua-Area Storm Water Group
February 16, 2005	Guest Presenters: David Ladd (MDEP) and Randee MacDonald (Aquarion Engineering, Inc.)	Seacoast Storm Water Coalition
February 24, 2005	NHDOT Storm Water Seminar (sponsored by NH-AGC) Speakers: Butch Knowlton, Deb Loiselle and Ron Crickard	Highway contract supervisors, owners and administrators
March 8, 2005	Erosion Control Seminar (NHDOT in-house training presented by Dave Smith, NHDOT-Consultant Section)	Bureau of Highway Design and Bureau of Bridge Design (50 attendees)
March 15, 2005	Bi-Monthly Meeting	ARC SWAT (formerly Manchester-area Storm Water Group)
April 6, 2005	Bi-Monthly Meeting	Seacoast Storm Water Coalition
April 13, 2005	Bi-Monthly Meeting	Nashua-Area Storm Water Group
April 14, 2005	Annual Technical Transfer Conference w/ Consulting Engineers (NHDOT Booth)	NHDOT and American Council of Engineering Companies (ACEC) NH
April 15, 2005	Bi-Monthly Meeting	Southeast Regional Storm Water Committee
April 19, 2005	Storm Water Seminar (sponsored by NH-AGC)	

Appendix B

BMP #1B(b) – Meetings and Presentations with Professional, Private, and Public Organizations

NHDOT will continue meeting with the surrounding New England states to coordinate programs, collaborate on common issues and share information related to the management of storm water.

DATE	MEETING/CONFERENCE	PURPOSE/TOPICS
May 4, 2004	6 th New England Transportation Mitigation Meeting, Providence, RI	• Update on Small MS4 issues with emphasis on drainage mapping/IDDE • Discussion of CGP issues, including preparation and implementation of erosion control plans • Discussion of EPA concern: increased chloride and conductivity levels attributable to de-icing practices
June 9 – 11, 2004	AASHTO Standing Committee on Environment/Subcommittee on Design Joint Meeting, Snowbird, UT	• Panel presentation on storm water management for DOTs
October 13, 2004	7 th New England Transportation Mitigation Meeting, Manchester, CT	• NPDES discussion session including software for mapping, and drainage policies for adjacent land owners
November 3, 2004	New England Chapter APWA 2004 Snow & Ice Conference, Rochester, NH	• Talks included salt brine spreading and improving snow and ice control while responding to NPDES Phase II • Field demonstrations included snow rodeo and turnkey landfill tour

Appendix C

BMP #1D – Sponsor-A-Highway

Appendix C

BMP #1D – Sponsor-A-Highway

NHDOT has collected data in support of this program since 1997. Data for each of the years 1997 through 2004 for the six Maintenance Districts is attached in this appendix. The number of bags collected continues to increase year to year, with the number of miles covered by the program peaking in 2003. A slight decrease in program participants was documented in 2004, although the number bags of trash collected showed an increase.

*State of New Hampshire
Department of Transportation*

Adopt-A-Highway Program

Annual Summary - 1997

Report Number 4
December 1997

<u>District</u>	<u>Miles</u>	<u>(KM)</u>	<u>Number of Groups</u>	<u>Number of Pick-Ups</u>	<u>Number of Bags</u>
1	210.37	338.70	67	138	2,345
2	301.48	485.38	126	258	3,923
3	227.60	366.44	92	207	3,742
4	97.04	140.13	44	112	2,356
5	216.15	348.00	92	154	2,647
6	158.4	255.02	71	148	3,269
Totals:	1211.04	1933.67	492	1,017	18,282
Previous Year	1,136.69	1,833.36	430	959	15,942

Notes/Comments:

1997

Average Number of Bags per Mile:	15.10
Average Number of Miles per Group:	2.46
Average Number of Bags per Group:	37.16
Average Number of Pick-ups per Group:	2.07

Since Beginning 1994

Total Bags 48,002

*State of New Hampshire
Department of Transportation*

Adopt-A-Highway Program

Annual Summary - 1998

Report Number 5
December 1998

<u>District</u>	<u>Miles</u>	<u>(KM)</u>	<u>Number of Groups</u>	<u>Number of Pick-Ups</u>	<u>Number of Bags</u>
1	229.00	368.69	56	152	2,213
2	330.02	531.33	141	330	8,240
3	278.40	448.22	110	231	3,933
4	106.71	171.80	48	124	2,228
5	287.95	463.60	119	190	3,790
6	174.80	281.43	80	208	4,079
Totals:	1,406.88	2,265.07	554	1,235	24,483
Previous Year	1,211.04	1,933.67	492	1,017	18,282

Notes/Comments:

1998

Average Number of Bags per Mile:	17.40
Average Number of Miles per Group:	2.54
Average Number of Bags per Group:	44.19

Since Beginning 1994

Total Bags 72,485

*State of New Hampshire
Department of Transportation*

Adopt-A-Highway Program

Annual Summary - 1999

Report Number 6
December 1999

<u>District</u>	<u>Miles</u>	<u>(KM)</u>	<u>Number of Groups</u>	<u>Number of Pick-Ups</u>	<u>Number of Bags</u>
1	231	372	72	134	2,392
2	321	517	131	227	3,614
3	317	510	128	172	3,003
4	115	185	51	137	2,706
5	325	523	137	208	4,123
6	174	280	80	202	4,221
Totals:	1483	2,387	599	1,080	20,059
Previous Year	1407	2,265	554	1,235	24,483

Notes/Comments:

1999

Average Number of Bags per Mile:	13.53
Average Number of Miles per Group:	2.48
Average Number of Bags per Group:	33.49

Since Beginning 1994

Total Bags 92,544

*State of New Hampshire
Department of Transportation*

Adopt-A-Highway Program

Annual Summary - 2000

Report Number 7
December 2001

<u>District</u>	<u>Miles</u>	<u>(KM)</u>	<u>Number of Groups</u>	<u>Number of Pick-Ups</u>	<u>Number of Bags</u>
1	262	422	82	113	1,998
2	275	440	127	96	2,241
3	393	629	165	196	3,334
4	115	185	52	126	2,284
5	294	473	122	208	3,811
6	243	389	108	180	3,619
Totals:	1,582	2,538	656	919	17,287
Previous Year	1,483	2,387	599	1,080	20,059

Notes/Comments:

2000

Average Number of Bags per Mile: 10.9

Average Number of Miles per Group: 2.4

Average Number of Bags per Group: 26.4

Since Beginning 1994

Total Bags 109,831

*State of New Hampshire
Department of Transportation*

Adopt-A-Highway Program

Annual Summary - 2001

Report Number 8
December 2001

<u>District</u>	<u>Miles</u>	<u>(KM)</u>	<u>Number of Groups</u>	<u>Number of Pick-Ups</u>	<u>Number of Bags</u>
1	266	428	83	116	1,861
2	251	402	109	80	1,276
3	393	629	165	174	3,028
4	149	239	66	140	2,812
5	306	492	129	210	4,405
6	160	256	78	156	3,328
Interstate MP	48	77	N/A	N/A	1,627
Turnpike MP	66	106	N/A	N/A	1,062
Totals:	1,639	2,629	630	876	19,399
Previous Year	1,582	2,538	656	919	17,287

Notes/Comments:

2001

Average Number of Bags per Mile:	11.8
Average Number of Miles per Group:	2.46
Average Number of Bags per Group:	29.1

Since Beginning 1994

Total Bags 129,230

*State of New Hampshire
Department of Transportation*

Adopt-A-Highway Program

Annual Summary - 2002

Report Number 9
December 2002

<u>District</u>	<u>Miles</u>	<u>(KM)</u>	<u>Number of Groups</u>	<u>Number of Pick-Ups</u>	<u>Number of Bags</u>
1	248	397	79	114	1,937
2	321	514	102	198	3,484
3	424	678	131	164	2,986
4	153	245	69	136	2,732
5	310	496	132	217	4,806
6	164	262	81	160	3,106
Interstate MP	52	83	N/A	N/A	947
Turnpike MP	68	109	N/A	N/A	504
Totals:	1,740	2,784	594	989	20,502
Previous Year	1,639	2,629	630	876	19,399

Notes/Comments:

2002

Average Number of Bags per Mile:	11.8
Average Number of Miles per Group:	2.75 (excluding maintenance provider sections-MP)
Average Number of Bags per Group:	32.1 (excluding maintenance provider sections-MP)

Since Beginning 1994

Total Bags 149,732

***State of New Hampshire
Department of Transportation***

Sponsor-A-Highway Program

Annual Summary - 2003

Report Number 10
December 2003

<u>District</u>	<u>Miles</u>	<u>(KM)</u>	<u>Number of Groups</u>	<u>Number of Pick-Ups</u>	<u>Number of Bags</u>
1	223	357	81	120	1,998
2	339	542	60	138	1,667
3	326	522	131	141	2,662
4	307	491	71	137	2,843
5	280	448	120	177	3,592
6	170	272	84	169	2,864
Interstate MP	70	112	N/A	N/A	1,340
Turnpike MP	68	109	N/A	N/A	1,184
Totals:	1,783	2,853	547	882	18,150
Previous Year	1,740	2,784	594	989	20,502

Notes/Comments:

2003

Average Number of Bags per Mile:	10.2
Average Number of Miles per Group:	3.01(excluding maintenance provider sections-MP)
Average Number of Bags per Group:	28.6(excluding maintenance provider sections-MP)

Since Beginning 1994

Total Bags 167,882

**State of New Hampshire
Department of Transportation**

Sponsor-A-Highway Program

Annual Summary - 2004

Report Number 11
December 2004

District	Miles	(KM)	Number of Groups	Number of Pick-Ups	Number of Bags
1	214	342	78	143	1,921
2	218	349	69	190	2,784
3	324	519	128	145	2,639
4	169	270	76	128	3,178
5	268	429	114	150	3,070
6	178	285	83	159	3,343
Interstate MP	70	112	N/A	N/A	1,410
Turnpike MP	64	102	N/A	N/A	1,154
Totals:	1,505	2,408	543	915	19,499
Previous Year	1,783	2,853	547	882	18,150

Notes/Comments:

2004

Average Number of Bags per Mile:	13.0
Average Number of Miles per Group:	2.52 (excluding maintenance provider sections-MP)
Average Number of Bags per Group:	31.2 (excluding maintenance provider sections-MP)

Since Beginning 1994

Total Bags 187,381

Appendix D

BMP #2A – Stakeholders Meetings

Appendix D

BMP #2A – Stakeholders Meetings

Following is a summary of the Storm Water Management Program stakeholders meetings held by the NPDES Phase II Administrative Team, individual NPDES teams, including the Good Housekeeping/Pollution Prevention, Public Education and Outreach, Illicit Discharge Detection and Elimination, Industrial and Construction teams, and other meetings related to administrating the NHDOT storm water program and carrying out specific tasks.

DATE	TEAM	PURPOSE/TOPICS	ATTENDEES
May 26, 2004	Kick-off Meeting – NHDOT and VHB NPDES Teams	• Personnel introductions • Project overview and objectives • Start date, schedules, time commitments • Roles/responsibilities • Action Plan • Other deliverables	NHDOT - Jim Colburn, Bill Hauser, Deb Loiselle, Charlie Hood, Paul Sanderson VHB - Pete Walker, Nat Norton, Bethany Eisenberg, Jake Tinus
June 2, 2004	NPDES Admin.	• Discuss consultant contract “housekeeping” • Overview 3 NPDES permits – MS4, CGP, IA • Action Plan deadline – May 1, 2005 • Discuss associated systems (MATS, IMP, RASCAL)	Jim Colburn, Deb Loiselle, Bill Hauser, Jake Tinus
June 3, 2004	NPDES Admin.	• MS4 Action Plan review • List of materials needed from NHDOT	Deb Loiselle, Jake Tinus
June 4, 2004	NPDES Admin.	• Review NHDOT structure and organization • Review Industrial Activities Permit tasks • MS4 Annual Report • Review IA guidance documents	Deb Loiselle, Jake Tinus
June 7, 2004	Industrial Activities	• Review Small MS4 tasks • Review General Construction Permit tasks	Deb Loiselle, Jake Tinus
June 9, 2004	Industrial Activities	• Discuss vehicle washing procedure and	Jim Colburn, Deb Loiselle, C.R. Willeke, Ryan

		approved soaps list • Use of road salt by NHDOT, I-93 big issue • NHDES concerned with brine discharges • Alternative methods for holding tank pump-out i.e., testing, if NHDES standards can be met • Registration forms – one used for sheds w/ similar practices • Mitch will review sites where pad or wash areas will be constructed, may require groundwater monitoring • Need to review all sheds for status	Lavoie, Mitch Locker (NHDES), Jake Tinus
June 14, 2004		• Discuss NHDOT Environmental Management System and ISO 14001	Paul Sanderson, Jake Tinus
June 16, 2004	NPDES Admin.	• Discuss EMS and IDDE • Current budget concerns – anticipate operations and program cuts • Industrial site status • Construction bureau progress	Jim Colburn, Deb Loiselle, Bill Hauser, Paul Sanderson, Jake Tinus
June 28, 2004	NPDES Admin.	• Paul Sanderson announced departure • Fate of EMS and IDDE • Components of IDDE • MS4 permit now main focus	Jim Colburn, Deb Loiselle, Bill Hauser, Jake Tinus
July 1, 2004	NPDES Admin.	• Presentation to Operations on Sept. 2nd • Formulate agenda • MS Project Action Plan/ Task Schedule update • Status of each District	Jim Colburn, Deb Loiselle, Bill Hauser, Jake Tinus
July 1, 2004		• Discussion of MATS history/status and how NPDES fits into system	Bill Watson, Jake Tinus
July 1, 2004	NPDES Admin.	• Agenda Discussion for	Jim Colburn, Deb Loiselle,

		Sept. 2 nd Meeting with Operations • Vehicle washing procedure • Floor drain issue • Need a checklist to determine facilities status	Jake Tinus
July 16, 2004	NPDES Admin.	• Review priority task listings from MS Project Action Plan for Front Office support request	Deb Loiselle, Jake Tinus
July 19, 2004	NPDES Admin.	• Operations meeting • IDDE efforts • NPDES Teams status • MS Project software request	Jim Colburn, Bill Hauser, Deb Loiselle, Jake Tinus
July 21, 2004		• Stacey's role in assisting with GIS SWMP figures	Deb Loiselle, Jake Tinus, Stacey Philbrook (Intern)
July 22, 2004		• Discuss available GIS mapping	Deb Loiselle, Dennis Fowler, Jake Tinus, S. Philbrook
July 22, 2004		• Review Draft Action Plan Tasks and assign work timeframe and responsible persons	Deb Loiselle, Jake Tinus
July 23, 2004	NPDES Admin.	• Critical mission request needed for software • IDDE effort needs new point person • Team leaders discussion • Administrative support needed	Bill Hauser, Deb Loiselle, Jake Tinus
July 27, 2004		• Introduce Mike Pillsbury to NPDES Team • Review history and status of NPDES • Agenda Discussion for Sept. 2nd Meeting with Operations	Jim Colburn, Bill Hauser, Mike Pillsbury, Deb Loiselle, Jake Tinus
August 2, 2004	NPDES Admin.	• Need budgets for Front Office Presentation • Jim to submit monthly progress reports to F.O. • Future meeting with	Jim Colburn, Deb Loiselle, Jake Tinus

		Team Leaders	
August 2, 2004		Review Draft Action Plan Tasks and assign work timeframes and responsible persons	Deb Loiselle, Jake Tinus
August 5, 2004	Good Housekeeping & Pollution Prevention	- Team Leader will review plans and assign responsibilities - BMP development	Deb Loiselle, Jim Marshall (Design), Jake Tinus
August 13, 2004	NPDES Admin.	- Action Plan - Front Office Meeting "Selling" NPDES to Front Office - Need to produce Executive Summary with cover memo and attachment	Jim Colburn, Deb Loiselle, Jake Tinus
August 16, 2004	NPDES Admin.	- Progress update - Front Office meeting on October 7th - Benefits of NPDES to NHDOT - Mission critical status	Jim Colburn, Bill Hauser, Deb Loiselle, Jake Tinus
August 17, 2004	Industrial Activities	- Meeting at Pittsfield Fueling Facility (Old Patrol Shed) to discuss site drainage and potential for exposure - Field inspection determined SWPPP necessary b/c of exposed materials and point sources	Deb Loiselle, Will Campbell, Jake Tinus
August 20, 2004	All NPDES Teams (Admin., Small MS4, Industrial, Construction)	- Introduction of Jake Tinus (VHB consultant) - NPDES Action Plan - Team Membership - Areas where Teams need support and /or clarification - Open discussion	Jim Colburn, Deb Loiselle, Jake Tinus, Jeff Albright, Chuck Dusseault, Doug DePorter, C.R. Willeke, Ryan Lavoie, and Jim Marshall
August 23, 2004	NPDES Admin.	- Patrol shed status - Critical mission status - IMP for NPDES	Jim Colburn, Bill Hauser, Deb Loiselle, Jake Tinus, Jon Evans
August 30, 2004	Industrial Activities	- Meeting at Hillsboro Patrol Shed (nearby picnic area) to discuss procedures - Brine solution disposal	Jim Colburn, C.R. Willeke, Ryan Lavoie, Julie Heimerdinger, Jake Tinus

		- from salt sheds • Monitoring agreements with other agencies at automated fuel facilities • Status of sand/salt mixing and loading areas (paved or not) • Vehicle washing locations • NPDES training tools • Review draft procedures	
August 31, 2004	NPDES Admin.	• NHDOT's storm water program • Contractor's NPDES responsibilities • NHDOT proposal for joint NPDES training for AGC	Jim Colburn, Deb Loiselle, Jake Tinus, Gary Abbott (AGC), and AGC Admin. Assistant
September 7, 2004	NPDES Admin.	• Review Action Plan Task Schedule • Items for Front Office presentation	Jim Colburn, Bill Hauser, Deb Loiselle, Jake Tinus
September 7, 2004	NPDES Admin.	• Review history of support requests to Front Office	Deb Loiselle, Jake Tinus
September 20, 2004	NPDES Admin.	• Jim, Deb and Bill to review draft Action Plan • Need Priority Team Tasks in Front Office presentation • Meet w/ Jim Marshall (NPDES liaison) prior to presentation • VHB continuing involvement in 2005 – meeting on Sept. 30th	Jim Colburn, Bill Hauser, Deb Loiselle
September 27, 2004	NPDES Admin.	• Front Office meeting postponed to November • Jim/Deb need for Administrative support • Meeting with Good Housekeeping Team	Jim Colburn, Bill Hauser, Deb Loiselle, Jake Tinus
September 28, 2004	Good Housekeeping	• Jim has begun to assemble team • Needs guidance on what tasks team can move forward on	Deb Loiselle, Jim Marshall (Design), Jake Tinus

		• Jake to provide task list from Action Plan	
September 30, 2004	NPDES Admin.	• Discussion of NHDOT programs/Jake's task • Future commitment of VHB in-house • Jake to provide Pete with copy of Action Plan and other documents • Pete will provide letter outlining VHB commitment to project • Jake's in-house hours may be reduced in 2005 to 3 days/week	Jim Colburn, Bill Hauser, Deb Loiselle, Jake Tinus, Pete Walker
October 13, 2004		• Discussion of Bethany's involvement in tasks • Action Plan specifics • Bethany's recommendations for Front Office presentation • Meeting to discuss mapping Oct 14th	Deb Loiselle, Jake Tinus, Bethany Eisenberg (phone)
October 14, 2004		• Discuss content of Front Office meeting • New date November 1st • Meeting needed to discuss drainage mapping	Jim Colburn, Deb Loiselle, Jim Marshall (Front Office), Jake Tinus
October 14, 2004		• Jim provided overall program description • Dennis explained existing mapping effort • Reviewed several options for mapping	Jim Colburn, Dennis Fowler, Jake Tinus
October 18, 2004	NPDES Admin.	• Suggested approaches for mapping • Alternatives for staffing positions • Ask NHDES to become more involved • Can education efforts be scaled back?	Jim Colburn, Bill Hauser, Deb Loiselle, Jake Tinus
October 19, 2004	Good Housekeeping	• Next steps for Team • "Stuck at ready" b/c waiting for outcome of	Jim Marshall (Design), Deb Loiselle and Jake Tinus

		Front Office meeting	
November 1, 2004	Front Office Presentation	• Jake presented proposed NPDES "Action Plan" and recommended personnel and funding • Feedback: Severely constrained budgets in FY 2005-2006 • Resources too slim to expand storm water program	Jim Colburn, Bill Hauser, Deb Loiselle, Jake Tinus, Peter Walker, Carol Murray, Jeff Brillhart, Jim Moore, Butch Knowlton, and Jim Marshall
November 1, 2004		• Discuss specific implications of cuts to tasks for each of the 3 permits	Deb Loiselle, Jim Colburn, Jake Tinus
November 3, 2004		• Discuss staffing options to present to Front Office • Review potential task cuts and implications • Review topics of November 4th Operations meeting	Jim Colburn, Jake Tinus
November 5, 2004	Illicit Discharge Detection & Elimination	• Existing mapping data (Louis Berger Pilot Study and municipalities) • Identify data needs • Strategy to tie NPDES into existing systems (Asset Management, MATS, statewide GIS efforts) • Investigate formation of subcommittee	Jim Colburn, Jim Moore, Bill Hauser, Dennis Fowler, Butch Knowlton, Steve Dubois, Deb Loiselle, Nat Norton, Jake Tinus
November 18, 2004	NPDES Admin.	• Follow-up to Nov. 1st meeting with Front Office • Discuss anticipated cutbacks to SWMP • Key elements from meeting with EPA on Nov. 15th • Jake to prepare memo to FO to outline impact of funding options	Jim Colburn, Bill Hauser, Deb Loiselle, Jake Tinus
November 22, 2004	NPDES Admin.	• Outcomes and expectations of Nov.	Jim Colburn, Bill Hauser, Deb Loiselle, Jake Tinus

		15 th EPA meeting • Jake to review/compile tasks for current staffing for NHDOT storm water program • Deb checking on availability of State Planning & Research (SPR) funds	
November 29, 2004	NPDES Admin.	• Jake to make revisions to follow-up Front Office memo	Jim Colburn, Bill Hauser, Deb Loiselle, Jake Tinus
November 30, 2004	Industrial Activities	• Meeting at Materials & Research to review program • History of NPDES training for NHDOT industrial sites • Upcoming M&R safely day would like to discuss NPDES	Deb Loiselle, Steve Mandeville, Jake Tinus
December 2, 2004	Industrial Activities	• Meeting at Lancaster Patrol Shed to review SWPPP for Lisbon shed • Written comments to be provided on SWPPP	Deb Loiselle, Dennis Croteau, Jake Tinus
December 7, 2004	All NPDES Teams (Admin., Small MS4, Industrial, Construction)	• Review November 1st meeting with the Front Office • Update on November 15th meeting with EPA • Status of team membership • Work plan for teams and support requirements that have been identified • Open discussion	Jim Colburn, Deb Loiselle, Jake Tinus, Jeff Albright, Chuck Dusseault, Doug DePorter, C.R. Willeke, Ryan Lavoie, and Jim Marshall
December 13, 2004	NPDES Admin.	• Jim/Deb review Remediation General Permit (RGP) • Deb review impact of U.S. Forest Service Management Plan on Pinkham Notch Patrol Shed • Review alternative staffing options for storm water program	Jim Colburn, Bill Hauser, Deb Loiselle, Jake Tinus

January 5, 2005	NPDES Admin.	• Deb/Jim currently working on RGP comments • Deb/Jake to review Industrial Activities procedures from Ryan/CR • Deb to review catch basin fact sheet • Deb investigating federal money (SPR funds)	Jim Colburn, Deb Loiselle, Jake Tinus
January 7, 2005	NPDES Admin.	• Jim discussed status of IDDE Team meeting • Jake to prepare town mapping survey • Ron Crickard currently reviewing construction SWPPPs • Jake to provide VHB template • Bill indicated that specs are being revised to reference NPDES	Jim Colburn, Bill Hauser, Deb Loiselle, Jake Tinus
January 24, 2005	NPDES Admin.	• Discussion of CLF comments on storm water program • IDDE mapping and survey status • Ron reviewing several SWPPPs to find best product for template • Deb several upcoming presentations: Jan. 28th – NPDES Family Feud ; Feb. 24th – AGC Meeting; April 14th – ACEC Meeting	Jim Colburn, Bill Hauser, Deb Loiselle, Jake Tinus
February 4, 2005	Industrial Activities	• Meeting at Materials and Research Bldg. • Reviewed progress thus far with program • SWPPP committee formed includes Brian Pike, Dick Fry, Leon Fannion • Steve will generate list of questions/concerns from committee for follow-up	Steve Mandeville, Jake Tinus

February 15, 2005	Industrial Activities and IDDE	• Meeting to discuss developing NPDES applications for IMP and RASCAL • Reviewed fields and drop-down menu prototypes developed by NHDOT • Next steps include defining processes required for permitting, inspections and reporting • Determined that NPDES for IMP and NPDES for RASCAL are separate processes – NHDOT will proceed with developing IMP first	Jim Colburn, Deborah Loiselle, Dale O'Connell, Ron Crickard, Julie Sieger, Jake Tinus, Brian DesMarais, Julie Heimerdinger
February 25, 2005	Illicit Discharge Detection & Elimination	• NPDES drainage mapping and how it fits into Asset Management model • Integration of MATS and the Asset Management Model • Data collection techniques and tools • SLD • Implementation • Subcommittee formation to recommend and implement pilot study area by June 1, 2005	Butch Knowlton, Jim Colburn, Deb Loiselle, Steve DuBois, Glenn Davison, Mike Burlage, Julie Seiger
March 3, 2005	Industrial Activities	• Discuss IMP development for NPDES (create flow chart, priority ranking system factor list, required document list, BMP and procedure list)	Deb Loiselle, Jake Tinus
March 10, 2005	Industrial Activities	• Discuss Steve M's questions and approach to March 11th meeting	Deb Loiselle, Jake Tinus
March 11, 2005	Industrial Activities	• Meeting at Materials and Research	Steve Mandeville, Brian Pike, Dick Fry, Leon

		• Jake reviewed Industrial Activities permit and Guidance Materials • M&R/Mechanical Services working jointly to prepare SWPPP • Jake to review SWPPP and do site inspection in April	Fannion, Jake Tinus
March 15, 2005	NPDES Admin.	• Annual Report deadlines • SWMP document due internally May 1st • Industrial Activities procedures meeting on April 7th • IMP/NPDES meeting March 30th • RASCAL/NPDES to be developed with I-93 funds • Deb & Bill meeting with NHDES to discuss project review and E&S/storm water management requirements • Deb has upcoming training sessions (ACEC – 4/14, AGC – 4/19, School – 4/22)	Jim Colburn, Deb Loiselle, Jake Tinus
March 24, 2005	NPDES Admin.	• Review progress on Minimum Control Measures 4 and 5 tasks	Ron Crickard, Jake Tinus
March 30, 2005	Industrial Activities	• Clarification of process design questions for IMP for NPDES • Discussion of information and data fields • Clarification of reporting requirements	Jim Colburn, Bill Hauser, Deb Loiselle, Jake Tinus, Julie Heimerdinger
March 31, 2005	NPDES Admin.	• Review draft Small MS4 Annual Report (Minimum Measures 1 through 4)	Jim Colburn, Deb Loiselle, Jake Tinus
March 31, 2005	NPDES Admin.	• Discuss Deb's departure from NHDOT	Deb Loiselle, Jim Colburn, Jake Tinus

		Bureau of Environment to NHDES Dam Bureau	
April 4, 2005	NPDES Admin	• Discuss ramifications of Deb's departure from NHDOT and NPDES program • Deb to compile list of tasks and prioritize • Jim to speak with Carol and Jeff about NPDES program status • Jim and Deb to review tasks and rank according to priority or critical status	Jim Colburn, Bill Hauser, Deb Loiselle, Jake Tinus
April 7, 2005	Industrial Activities	• Discuss proposed simplification of Vehicle Washing procedure • Met with Mitch Locker to determine process for updating procedure • Submitted example of Vehicle Registration to Mitch for review	Jim Colburn, Bill Hauser, C.R. Willeke, Ryan Lavoie, Jake Tinus, Mitch Locker (NHDES)
April 8, 2005	NPDES Admin.	• Discuss possible evolution of NPDES program with Deb's departure • Possible future staffing scenarios • Need to discuss program at April 11 meeting	Jim Colburn, Deb Loiselle, Jake Tinus
April 11, 2005	NPDES Admin.	• Discussion of overall NPDES Phase II program and NHDOT efforts for BOE Senior Environmental Mngrs. • Review prepared materials (MS Project task timeline, priority team tasks, etc.) for potential storm water coordinator replacements	Jim Colburn, Bill Hauser, Deb Loiselle, Jake Tinus, Charlie Hood, Russ St. Pierre, Mark Hemmerlein, Kevin Nyhan
April 19, 2005	NPDES Admin	• Review draft MS4 annual report • Discuss status of IMP for NPDES	Jim Colburn, Jake Tinus
April 25, 2005	NPDES Admin	• Review steps needed	Jim Colburn, Jake Tinus

	and Industrial Activities	to further process of development of IMP for NPDES • Ask Mike Burlage to provide types of reports that would be useful • Have follow-up meeting week of May 2nd with Julie H. (JWC)	
April 27, 2005	NPDES Admin	• Final review and printing of Annual Report	Jim Colburn, Jake Tinus

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Appendix E

BMP #4D – Meetings with EPA Region 1 and NHDES

Appendix E

BMP #4D – Meetings with EPA Region 1 and NHDES

Meeting agendas and conference reports detailing action items are included in this appendix.

Re Construction Questions Answers 022704

From: swaine.abby@epamail.epa.gov
Sent: Friday, February 27, 2004 5:35 PM
To: Deborah Loisel
Cc: Chris Jendras (E-mail); murphy.thelma@epamail.epa.gov
Subject: Re: Construction Questions

Deb-- I can always rely on you to ask stimulating questions! I'm going to take a crack at these, but it's always best to wait for an endorsement from Thelma, especially for #1 & #4. --Abby

Deborah Loisel

<DLoisel@dot.s

tate.nh.us>

Jendras/R1/USEPA/US@EPA

To: Abby Swaine/R1/USEPA/US@EPA

cc: Chris

Subject: Construction Questions

02/27/2004 03:01

PM

Hello Abby!

As you are aware, we are preparing for some awareness training over the next two weeks and as I prepare for the "construction" portion, I need your help. There were a few questions that came up at Construction School (Chris Jendras was there) and I just want to reconfirm the answers, and obtain answers where I didn't couldn't provide any.

1. Do both the Owner and Operator NOI have to be noted as "active" before we can start work? Chris noted that as long as the Operator NOI (ie Contractor) was active then it was okay to start work and this was because we put the ownership of the SWPPP development on the Contractor and shared the SWPPP with them. Please verify this statement.

Usually, the owner meets the definition of the type of operator who has control over the plans and specs. NH DOT would be an operator, so they and the contractor would both have to file an NOI and be authorized ("active") before work starts. If NH DOT puts the responsibility for developing the SWPPP on the contractor, when NH DOT files an NOI they'd be attesting that there is a SWPPP for the project and that they know what's in it and their role in carrying it out. This is all consistent with the way Mass Highway is doing things.

2. Who is responsible for accidental releases? I noted that it was both the owner and operator because we both file and share a SWPPP. Please verify this statement.

Re Construction Questions Answers 022704

The duty to report and deal with releases of haz substances or oil in reportable quantities is independent of the CGP, so whoever is involved with the site and operation should report. Also, the SWPPP should describe how the operators plan to prevent and deal with any releases, and assign roles for doing so, and should contain documentation of any such events.

3. What constitutes the start of work? Does cutting down a tree? I think where they are going with this is they want to know what they can do prior to receiving permit coverage (if anything). Please advise.

Clearing is given in the permit and supporting materials as one example of land disturbance that triggers the need for this permit, so yes, permit coverage would need to be in place when tree cutting starts. This makes sense because removing trees usually means trucks are disturbing the soil (their tires are digging in, and the trunk is being dragged along, etc), and because fewer trees reduces the ability of the land to handle storm water, even before grubbing the stumps (leaf surfaces hold a large amount of water and allow it to evaporate rather than reach the ground).

4. Offsite storage/disposal is still a hot issue. Personally, I am still a little confused. My understanding is that offsite disposal areas that are part of the project, need to be noted in the SWPPP. Do appropriate erosion control measures also need to be taken, etc? Also, my understanding is that once the disposal materials are "sold" they no longer need coverage under the project SWPPP. Again, any clarification that you can provide would be great.

Yes, disposal areas & materials associated with the project need to be part of the SWPPP-- specifically the site map, description of controls, and inspection log. If you transfer ownership of the materials to someone who's not an operator at the site while the project is still ongoing, you'd document that in the SWPPP (I would include the bill of sale if I were the operator). I don't think (based on part 5.2.A.2 of the permit) that these materials/areas need to be "finally stabilized" before you can transfer ownership of them, but I would make sure they were well stabilized in a temporary fashion, and that you document having done so in the SWPPP also.

Abby, I am not trying to second guess what Chris noted at Construction School, I would just like a verification. Please provide me some clarification and/or reference to the permit and/or fact sheet. I thank you very much! The Construction Bureau has been very receptive and I would just like to continue feeding them bits and pieces.

Deb

**STATE OF NEW HAMPSHIRE
INTER-DEPARTMENT COMMUNICATION**

DATE August 6, 2004

FROM Ronald Crickard
 District Environmental Coordinator

AT (OFFICE) Department of
 Transportation

 Deb Loiselle
 Senior Environmental Manager

SUBJECT NPDES Awareness Training for Construction Bureau Personnel

TO Ted Kitsis, Administrator
 Bureau of Construction

 Bill Hauser, Administrator
 Bureau of Environment

During the month of April, we brought the "show on the road" to six (6) New Hampshire locations. We would like to thank you for the opportunity to provide the Bureau of Construction personnel with NPDES Awareness training because we feel it was a huge success. Although it was a challenge, it was important that all Bureau of Construction personnel received the same message for the 2004 construction season. In the past, construction personnel had received an NPDES-related message in some format at Construction School, however, this training gave them the "big" picture relative to NPDES. This was important because it gave them an overview of water quality concerns and also how they fit into the larger scheme of things both professionally and personally.

As part of the presentation, all attendees were asked to fill out pre- and post-surveys. The following quotes are good representations of the surveys received:

"It helped identify changes to the guidelines for control of storm water runoff. It gave a good basis for the development of EPA requirements. It opened my eyes to what constitutes storm water pollution."

"Enabled CE's and CA's to implement NPDES Phase II construction permits (CGP) correctly and effectively."

"Our responsibilities as Contract Administrators were made clear."

"A better understanding of the program and how I fit it."

"Was initially somewhat aware of subject as it related to DOT, but now am much more prepared to implement Federal requirements to protect water quality."

"Thanks for your effort, care and genuine concern."

"I think that these should occur 3-4 times per year with the above suggestions (case studies, discussions, hands-on activities, etc.) part of the training."

We believe that this training has been a huge success based on the following: survey results, follow-up phone calls, requests from Contract Administrators for project reviews relative to NPDES, discussion of NPDES requirements at pre-con meetings and field reviews.

We look forward to continuing our efforts and assisting the Construction Bureau with the NPDES requirements. We would be pleased to discuss the success of the training at your earliest convenience.

Based on a review of the surveys, follow-up phone calls and the CGP requirements, we propose the following *Action Plan* for the Bureau of Construction during the 2004 construction season:

- Field reviews with the Bureaus of Construction and Environment and EPA
- Educate Contractors
- Update NHDOT Specifications
- Update internal form (prelude to NOI), provide guidance document on how to fill it out, and train Department personnel
- Prepare for 2005 Construction School
- Prepare a NHDOT specific Q&A for construction-related questions
- Meeting with NHDES
- NPDES checklist for Highway and Bridge Design
- Training for hired inspectors
- Prepare waiver form for winter inspection monitoring
- Prepare waiver form for SWPPP certification

Consideration of the above action items will assist the Department in fulfilling the NPDES regulations in addition to keeping these regulations in the forefront

cc: Jim Colburn
Jeff Allbright
Charles Hood
Jake Tinus

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Comments from the 8/03/04 Field Review with EPA

1. Print out the names on the certification certificate – **Ron** prepare for Construction School handout. Include handout as part of the NPDES guidance to be distributed at future pre-con meetings.
2. Newfields SWPPP had utilized the CGP and referenced the appendices or documents and also highlighting specific issues. Thelma suggested converting this file into PDF and then inserting spaces so that it is easier for individuals to reference and document information - Use the Newfields SWPPP as a standard and look into Thelma's suggestion. **Ron** will coordinate with Andy O'Sullivan and Adam Chestnut to develop standardized material to assist field personnel.
3. Newfields inspection reports had several instances in which the monitor had circled both "yes/no" which would confuse an inspector – Don't circle both or explain in detail why both were circled. **Ron/Deb** review current inspection reports and prepare standardized form. Ron will coordinate with Andy O'Sullivan and Adam Chestnut.
4. CGP notes that all discharge locations need to be done. See CGP page X, section X. Suggested that if no discharge then make a notation such as clear discharge, storm water only, etc and note the location points. **Ron/Deb** discuss ways to do incorporate this into the inspection reports and ECPs. **Deb** will provide the Industrial Activities inspection forms as an example.
5. Make sure that SWPPP-referenced documents are readily available (i.e. in the field office or vehicle) **Ron** –note at Construction School
6. Resumes contained in the ECP shows that qualified personnel are preparing the plans and inspecting the project. **Ron** –note at Construction School. Include "Letter of Expectation" in the NPDES guidance packet to be distributed at pre-con meetings.
7. General comment from Abby Swaine that EPA inspectors are noting problems with stock piles and borrow pits. **Ron/Deb** – review CGP and current NHDOT disposal agreement; further discussion with EPA
8. Newfields SWPPP had highlighted areas that were disturbed and noted as staging areas. **Ron** –get a copy of the Newfields SWPPP and use this as a "guide" for others?? Ron will coordinate with Andy O'Sullivan and Adam Chestnut and determine the best method (maybe checklist?). Include final product with the NPDES guidance packet to be distributed at pre-con meetings.

9. Abby Swaine noted that you need to make a notation of the fill piles. See CGP page X, section X. **Ron** – Prepare log sheet for disturbance areas, stock piles, etc. and include final product with the NPDES guidance packet to be distributed at pre-con meetings.
10. Include all disposal agreements as an appendix. **Ron** – note at Construction School
11. Thelma Murphy made a general comment regarding the organization of the SWPPP. The SWPPP should be organized in the same manner as the CGP and make sure that referenced documents are readily available. Make sure that noted BMPs are actually being employed in the field or document “why” or if a change has been made. **Ron** –note at Construction School
12. Abby Swaine noted that the current weather conditions and the conditions from the time of the last inspection need to be noted on the inspection forms. **Ron** –use the rainfall amount records and rainfall collector and note at Construction School. Talk with Peter Anderson about incorporating this information in the Daily Reports.
13. Need to note batch plants onsite and address them appropriately. Reference the CGP and determine what needs to be done. **Ron/Deb** – review CGP wording and determine how to address.
14. Address good housekeeping and non-stormwater issues in the SWPPP. **Ron/Deb** – review CGP wording and determine how to address.

follow up on 080304 site visits EPA and NHDOT
From: murphy.thelma@epamail.epa.gov
Sent: Wednesday, August 18, 2004 11:46 AM
To: Deborah Loiselle
Cc: jendras.chris@epamail.epa.gov; swaine.abby@epamail.epa.gov
Subject: follow up on 8/3/04 site visits

Deb,
Thanks again for setting up the opportunity to visit some DOT sites and review the SWPPPs. I mentioned this to you on the phone, but wanted to also drop you a quick note. One area of the SWPPP I think could use a bit more details is Part 3.13. This section deals with management practices, specifically discussions about management of litter, construction debris and other wastes. These items should be described in more detail. I know you took notes during the visits. If you have any questions, please let me know.
Thanks again,
Thelma

Thelma Murphy
Storm Water Coordinator
USEPA - New England
One Congress Street - Suite 1100 (CMA)
Boston, MA 02114
617/918-1615
murphy.thelma@epa.gov

Meeting agenda 111504 EPA NHDOT
From: murphy.thelma@epamail.epa.gov
Sent: Wednesday, November 10, 2004 11:23 AM
To: Deborah Loiselle
Subject: Meeting agenda

Meeting: November 15, 2004

EPA/NHDOT

Agenda:

- 10:00 - 11:30 Construction - Revisit issues from June 30, 2003 meeting and discuss questions raised at the NPDES Awareness training.
- 11:30 - 12:00 Lunch- we can have some sandwiches/salads delivered.
- 12:00 - 2:00 Discuss the small MS4 annual report and other issues that impact the small MS4 program.

See you on the 15th.

Thelma Murphy
Storm Water Coordinator
USEPA - New England
One Congress Street - Suite 1100 (CMA)
Boston, MA 02114
617/918-1615
murphy.thelma@epa.gov

**NHDOT NPDES Phase II Program
Review with EPA Region 1
Meeting Minutes
Final**

DATE: November 15, 2004, 10:00 am – 3:00 pm

PLACE: EPA New England Regional Laboratory – Chelmsford, MA

PURPOSE: Discuss Construction-related Questions from June 30, 2003 Meeting, Questions Raised at NPDES Awareness Training Sessions in 2004, NHDOT's 1st Annual Report for Small MS4 Permit, Issues Related to all NPDES Phase II Permits, and Describe Current Structure of the NHDOT Storm Water Program Including Staffing and Budget Considerations

ATTENDEES:

<u>Name</u>	<u>Title</u>	<u>Agency/Affiliation</u>	<u>Email</u>
Thelma Murphy	Storm Water Program Coordinator	EPA Region 1	murphy.thelma@epa.gov
Jim Colburn	Project Manager	NHDOT	jcolburn@dot.state.nh
Debbie Loiselle	Senior Environmental Manager	NHDOT	dloiselle@dot.state.nh
Ron Crickard	Environmental Coordinator	NHDOT	rcrickard@dot.state.nh
Jake Tinus	Senior Environmental Scientist	VHB Consultant	jtinus@dot.state.nh.us

MEETING OVERVIEW:

Deb Loiselle reviewed the meeting's purpose and agenda. Participants followed up on questions related to construction activities presented previously at a June 30, 2003 meeting with EPA Region 1. Additional questions raised at NHDOT NPDES Awareness Training sessions in 2004 were also discussed. Prior to this meeting, the NHDOT NPDES Phase II Team had prepared answers to employee's questions and presented their answers to Thelma Murphy for concurrence. Ron Crickard departed after the morning construction portion of meeting was completed. After a break for lunch, remaining attendees discussed issues related to all NPDES Phase II permits, NHDOT's 1st Annual Report for Small MS4s, and other program-related issues. Jim Colburn presented an overview of the current status of NHDOT's storm water program, including current organizational issues and staffing and budget considerations. Additional meeting details are presented below. See previous meeting notes for complete text of numbered questions referenced below.

MEETING NOTES:

Issues/Discussions Regarding Questions Raised at June 30, 2003 Meeting on Construction Permit Requirements

1. Issue: *Is a permit required for smaller projects such as resurfacing and guardrail replacement?*

Discussion: Thelma noted that the issue boils down to whether there is "land disturbance", or whether soil is being disturbed. Soil is defined here as the material below the sub-base of a road, or a shoulder or other areas which are exposed from clearing, grading, or excavating. Where the disturbances add up to one acre, a permit is required. One SWPPP can be prepared for several small projects that add to one acre, as long as the projects are related. Thelma offered a rule of thumb: If one set of plans is prepared for a project that includes several small projects or phases, then one SWPPP can be prepared to cover all the related smaller projects. Ron stated that NHDOT is working on specifications to require a SWPPP by contractors, even when an NOI isn't required. Thelma acknowledged that this is a favorable arrangement.

Deb offered an example of a NHDOT project for comment on whether a permit would be required. The project entails widening and lengthening ditches as needed or when necessary across District 6, in 10 separate communities. Thelma suggested the following guidance. Although the project appears to involve mostly maintenance activities rather than construction activities, the total scope of the project may add to one acre and involve disturbances near sensitive resources. When a project is conceived of collectively, all of the ditch maintenance activities as well as minor widening and lengthening (even though in different towns), need to be considered together to determine whether they add to one acre and

potentially impact Waters of the U.S. Different BMPs may need to be employed in different areas, depending on the nature of the work and its proximity to sensitive resources such as TMDLs, 303(d) waters, NH listed rivers, etc.

Regarding the issue of isolated wetlands, EPA council is still reviewing the status of isolated wetlands in Region 1. It was noted that although isolated wetlands in many instances do not appear on the surface to be connected to adjacent wetlands, they may in fact be connected hydrologically via seasonal surface flow or by ground water (unseen) and therefore may not be actually "isolated." This is the crux of the continuing discussion at EPA, and amongst other resource agencies and parties.

With respect to the requirement to name all Waters of U.S. on project plans, Thelma indicated that plans should show all named waters as well as unnamed waters. Where possible, it is desirable to determine to which waterbody or watercourse, drainage from development sites flow, and label the unnamed waters e.g. "Unnamed North Tributary of XXX River" or "Drains to Tributary of Lake XXX".

2. Issue: *Is guardrail upgrading considered land disturbance?*

Discussion: In general, a project qualifies as construction activity if it involves clearing, grading or excavating. After Ron provided an explanation of what types of activities a guardrail project typically entails, Thelma offered the following guidance. If the guardrail upgrade project involves simply pulling up the old guardrail supports and replacing with new ones, the activity qualifies as a "maintenance" activity and does not require an NOI. Deb explained that NHDOT occasionally has larger guardrail projects that extend for long stretches of roadway. Do these require an NOI? Thelma indicated these larger projects would still be classified as "maintenance" activities. As long as the activity does not involve land disturbance totaling one acre or more, the project does not require permit coverage. Further, a guardrail project may qualify as a "construction" project if it involves clearing, grading, and/or excavating to install new lengths of guardrail. This would be an atypical scenario, however, as new guardrail installation is typically part of road construction or reconstruction and these activities would already require permit coverage. Deb offered Thelma to visit an active guardrail project in the field during the 2005 construction season to which Thelma agreed.

3. Issue: *Is the SWPPP one document?*

Discussion: Thelma indicated that NHDOT appears to have a good SWPPP product in place at its sites. Other than for additional "beefing up" of the "Good Housekeeping" section of the document, the Department is in good shape. Deb indicated that she and Ron would be working on enhancements to the Good Housekeeping section over the winter months when time is more available.

4. Issue: *Is addition of gravel considered disturbance?*

Discussion: The addition of gravel to a roadway or roadway shoulder is not considered disturbance and therefore does not require notification or permit coverage.

5. Issue: *Define "construction" versus "maintenance."*

Discussion: See previous discussions above.

6. Issue: *Are landscaping projects considered land disturbance?*

Discussion: Landscaping activities (including tree planting) would not require permit coverage unless the total of all disturbances for each tree/shrub, etc. that is being planted equals one acre or more. Thelma suggested that it should be easy enough to calculate the total amount of disturbance based on the average size of planting holes that would be needed multiplied by the number of trees/shrubs etc planted. It was agreed that it would be a very uncommon event for NHDOT to be planting enough trees/shrubs to total one acre or more and thus require a permit solely for landscaping activities.

7. Issue: *CGP notes that offsite disposal areas must be addressed by SWPPP.*

Discussion: This issue is discussed below on Page 4, Item #6.

8. Issue: *Does a SWPPP need to be completed prior to a NOI?*

Discussion: According to the CGP, the SWPPP needs to be prepared prior to the NOI submission. However, this does not always happen. Ron described a situation whereby contractors submit NOIs to EPA prior to submitting an erosion control plan to NHDOT. The problem is NHDOT doesn't notify EPA until they have had a chance to review and comment on the plans. Thelma advised that any required coverage under a permit should be "active" under NOI notification, by the contractor (the "operator") and NHDOT (the "owner"), prior to any land disturbance. Work should not proceed without both a SWPPP and a project-specific NOI. Deb suggested that NHDOT specifications be modified to state that all parties should have obtained coverage under the permit prior to starting any work. She and Ron will work to draft additional language for NHDOT specifications.

9. Issue: *When is a dewatering permit needed?*

Discussion: Thelma indicated that a dewatering permit is only necessary on projects that are less than one acre and are discharging contaminated water.

Deb offered a hypothetical project example for discussion. The project involves one to five acres of disturbance. All background information/studies suggest that no contamination exists. The contractor begins to dewater and discovers contaminated discharge. How does the contractor proceed? Thelma answered that the contractor must immediately stop work and file to obtain remediation permit coverage.

A draft "remediation" permit was recently issued for comment. This permit covers contaminated discharges from areas with one acre or more of disturbance. EPA is currently working on a fact sheet for the permit. No one at the meeting has yet had an opportunity to review the draft permit.

10. Issue: *General Issues*

Discussion: There was no further discussion of general issues at this time.

Issues/Discussions Regarding Questions Raised During NPDES Awareness Training Sessions in 2004

1. Issue: *Does placement of silt fence constitute land disturbance?*

Discussion: Thelma offered her interpretation of the permit as it relates to this work. Since installation of silt fence may involve land clearing (albeit along narrow swaths) and involves excavating and backfilling soil to entrench the silt fence, land disturbance equaling or exceeding one acre requires notification. The NOI has to be "active" prior to the start of silt fence installation in these cases.

2. Issue: *Who at NHDOT is responsible for "prep" work with regard to CGP?*

Discussion: Deb indicated that this is an internal question for NHDOT to resolve and does not require EPA comment.

3. Issue: *Does tree cutting for maintenance/safety constitute land disturbance/construction activity?*

Discussion: No additional comments were provided to the guidance in the draft document (attached).

4. Issue: *Does NHDOT need to file for CGP coverage as an "owner" with a municipality if the municipality is working on a trenching or driveway project within a NHDOT ROW?*

Discussion: Thelma indicated that a CGP would probably not be typically required for this arrangement. A permit would be required if an applicant meets the definition of "operator" i.e. in cases where NHDOT is responsible for plans or for day-to-day operations at a site. Deb indicated that Ron or Jake would be drafting the appropriate language to revise the driveway connections manual accordingly.

5. Issue: *What are minimum or maximum quantities of sediments and spills of hazardous materials that can be released from a site under the CGP?*

Discussion: Thelma provided the following comments on this issue. The permit does not "authorize" any amount of sediment release from construction activities. Rather, the program is in place to authorize discharges of storm water to Waters of the U.S. Through various BMPs, the goal of the permit is to establish mechanisms, procedures and structural devices or mechanisms at construction sites to ensure that all sediment will be contained on construction sites and prevent

discharge to Waters of the U.S. to the "maximum extent practicable." Although there is no requirement to notify EPA of sediment releases from a site, it is required and expected that releases be documented in the SWPPP and that remedial actions taken to correct sediment release problems be documented. The SWPPP is to be considered by all parties to be a living document.

There is a reporting requirement for hazardous materials releases from sites. Thelma offered to provide a list of reportable quantities to NHDOT. Regarding site visits from EPA, Thelma indicated that it is unlikely and hard to predict whether EPA would visit any given site, unless they are notified of egregious violations. However, she indicated that the public is ever more vigilant to potential violations through their increased awareness of storm water issues, which indicates that the general permit program is working as intended.

6. Issue: *Clarification is needed on the status of borrow pit, storage and disposal areas with regard to NPDES permits.*

Discussion: Thelma indicated that any borrow pit or storage area should be planned for and indicated on the SWPPP for the project. If new ground is being opened up, these activities should be factored in to calculating whether activities total one acre or more of land disturbance. Both contractor and NHDOT should each have a SWPPP that clearly identifies their responsibilities with regard to borrow pit and storage areas. If material is being brought in for a job from an established gravel/sand pit, the pit should have its own permit coverage. NHDOT is not responsible for the pit operator's actions. Likewise if material is transferred from the site, the hauler is responsible for ensuring the material is disposed in accordance with all rules and regulations and has obtained all necessary permits to do so. Jim noted that NHDOT specifications should be "beefed up" to recognize the source of materials and the responsibility of each party with regard to storm water management. Thelma suggested looking at the NPDES Phase I permit from 1998.

7. Issue: *Pertaining to wetland impacts applied for in permit versus actual wetland impacts.*

Discussion: Deb indicated that this is an internal question for NHDOT to resolve and does not require EPA comment.

8. Issue: *Where should SWPPP be located on roadway improvement projects, which are linear?*

Discussion: In a nutshell, if there is no "field office" as a construction site, the SWPPP as well as other documents should reside with the construction supervisor or in the NHDOT Contract Administrator's vehicle.

9. Issue: *What is the timeframe for updating the SWPPP?*

Discussion: No additional comments were provided to the guidance in the draft document (attached).

10. Issue: *Do inspections need to be conducted during winter when projects are temporarily closed?*

Discussion: No additional comments were provided to the guidance in the draft document (attached).

11. Issue: *Does reclaiming alone require CGP coverage?*

Discussion: A definition of "scarifying" was provided. No additional comments to guidance in draft document.

12. Issue: *What is the status of historic properties, currently noted as "reserved" in the CGP?*

Discussion: Other than the standard guidance of "permittees are reminded to comply with all federal, state and local laws governing impacts to historic properties, etc.", Thelma indicated that no specifics have been provided to her yet with regard to historic properties.

Thelma indicated that although the section is currently left blank in the permit, it is still a very important consideration during project development and can often shape the outcome. To illustrate her point, she described an example where the historic nature of a property was at the middle of a controversy. A historic armory was the proposed site for a library by a town. The town indicated that the armory site was the only one in town suitable for the building. Although the project was approved, it has to incorporate structural components of the armory in its design.

Deb indicated that all NHDOT projects consider historic properties along with all natural resources during the review process. This process involves resource agencies responsible for the built environment and natural resources. Agencies are given the opportunity to comment at various points during the development, design and permitting phases of a project.

13. Issue: *Define the terms road maintenance and road construction.*

Discussion: Examples of these activities were discussed previously.

14. Issue: *Does wetland dredging/filling constitute "land disturbance"?*

Discussion: No additional comments were provided to the guidance in the draft document (attached).

15. Issue: *Do both the "Owner" and "Operator" NOIs have to be "active" before work can start?*

Discussion: Deb indicated that in earlier guidance to the Department, EPA indicated that the owner/operator status "should" be active throughout the project. Deb queried why the word "should" was being used. Thelma responded that the word "should" was used because the permit does not specify "must" in its language.

Other Issues

Thelma mentioned that the EPA is currently being sued in the 7th Circuit Court over its handling of the NPDES Phase II program. The suit by the Conservation Law Foundation (CLF) and Natural Resources Defense Council (NRDC) contends that EPA should establish specific storm water pollutant effluent levels to meet the goals of the Clean Water Act. Currently, the permits require BMPs to reduce pollutants in storm water to the maximum extent practicable. Thelma indicated that the environmental organizations have requested copies all NOIs submitted to EPA by every community in New Hampshire, and by approximately 20 communities in Massachusetts. Thelma said that the case is in response to the 9th Circuit Court, with plaintiffs asking whether EPA authorized discharges to impaired waters and whether or not the BMPs that EPA approved actually worked.

Discussion of NHDOT Small MS4 Program

Jim explained the current status of the program in light of the recent Front Office meeting on November 1st. At the meeting the NHDOT NPDES Phase II Team described the need for increasing the staffing and/or use of additional consultants to accomplish the goals of the program as authorized under the current NOI. Further, he described the Team is preparing some additional documentation to describe various staffing and budgeting scenarios for the Front Office. Jim explained that it could be one to two months before specific feedback is received on what level of support will be provided by the Front Office.

Jim then provided a brief explanation of how New Hampshire government and the agency are organized in response to Thelma's questioning, and to set the context for the realities of running the Phase II program at Department.

Jim explained that NHDOT was likely to be able to meet its commitments in the second year of the program, but in years three through five, he was concerned that some elements may have to be scaled back or postponed into the future as the amount of work that needs to be done increases during this time frame. Thelma acknowledged that NHDOT has been doing a great job with its program thus far considering staffing and budget limitations, and offered to write a letter to the NHDOT Front Office explaining EPA's satisfaction with the Departments efforts.

Jim asked whether EPA could provide some guidance on what elements are the most critical in EPA's eyes, and to suggest which elements of the program could be delayed or reduced if staffing and budgetary realities dictated so. Thelma advised that EPA views several areas as critical to the success of the program. Illicit discharge detection and elimination (IDDE), public and internal education, outreach with communities and local groups, good housekeeping measures, I-93 salt education efforts, and improvements to winter weather maintenance, including the Road Weather Information System (RWIS), were mentioned as crucial elements of NHDOT's efforts.

With regard to the IDDE program, Thelma indicated that the Department could modify its approach to the drainage mapping to include a focus on a smaller initial subset of the mapping (i.e. map larger pipes/conveyances, areas near critical resources, or do mapping during known maintenance schedules) to get the ball rolling. She indicated that although mapping doesn't need to be all done simultaneously, progress must be shown that the Department is working toward developing this program. In particular, the Department should pay attention to impaired waters, drinking water supplies, and beaches. Jim explained that a meeting had recently occurred whereby committee members were selected to work to consider all the issues and work toward developing a successful program. He said that the goal was to develop a program that meets other data collection needs and fully integrates with other functional systems at the Department.

Thelma applauded NHDOT's education and outreach efforts. Acknowledging that the education component of the program involves a significant amount of time and effort, Thelma indicated that EPA is currently developing an educational program, which is based largely on Maine's "Think Blue" program. Called "Think Blue New England", the educational program is envisioned to take some of the education and outreach burden off permittees. Deb indicated that she would be appreciative of the assistance and noted that some communities are definitely struggling with some issues (such as developing ordinances, where to begin with mapping efforts), while others are excelling at administration of their programs (Danville example).

With regard to good housekeeping, Thelma encouraged NHDOT to be proactive and to continue to work towards improving its BMPs, particularly as they relate to the handling of road salt and other maintenance activities. Jim explained that the Department is continuing its development of RWIS, with six to eight new sites to come on-line soon. Deb explained that salt brine trucks were going to be utilized in certain areas this winter, and that she is actively involved with the issue at NHDOT. Deb explained that she facilitates meetings between town officials, watershed groups, and small work groups and runs "Salt-ed" educational workshops. Thelma indicated that these efforts are very important because they acknowledge that NHDOT is aware of the "road salt issue" and is doing something about it.

In light of NHDOT's education and outreach efforts, Thelma offered a suggestion to help groups that are struggling with compliance with NPDES Phase II. She suggested that it might be helpful to "showcase" communities (at watershed or storm water group meetings) that have been particularly successful with developing their programs or aspects of their programs. Deb commented that this idea was suggested for the proposed 1st Annual NH Regional Storm Water Workshop.

Regarding storm water ordinances, Thelma indicated that several towns (Derry, Hollis, Durham and others) have been successful with this mechanism, and perhaps their efforts should be highlighted as well.

Noting other municipal efforts, Thelma noted Manchester's approach to mapping was successful in integrating the interplay of its drainages and assets. With regard to the mapping outfalls component specifically, she noted that Durham and Dover probably have the best overall programs of the state's municipalities.

Considering personnel constraints at NHDOT, Thelma suggested that the Department might want to consider the use of interns for certain aspects of its storm water program. She noted that some DOTs have found success with this approach.

With regard to where "cutbacks" might occur, Thelma acknowledged that NHDOT has done a lot of front loading with the program, but cautioned against cutting back too much as it might not be viewed as a good example for communities. Deb acknowledged that a lot of communities have expressed the sentiment "if NHDOT can do it, so can we!"

Multi-Sector General Permit for Industrial Activities (Sector P)

Jake inquired about the status of the Industrial Activities permit. Thelma indicated that a draft is to be expected in Spring 2005. The thought behind this permit is that the types of facilities regulated under the permit all have the potential to pollute. The question is what is the collective significance of this potential. Thelma feels that using SICs as a surrogate for environmental harm may not be the best way to approach the potential problems that industrial facilities pose. The issue of monitoring (who, when, where, how) is being reviewed, as is whether or the permit will apply to the whole country or separate permits for some or all regions.

Appendix F

BMP #6F – No Exposure Certification

Appendix F

BMP #6F – No Exposure Certification

Worksheets summarizing the status of each NHDOT patrol shed are included in this appendix.

NPDES Phase II - Industrial Activities Status Checklist Summary by District and Bureau

District/ Bureau	Number of Industrial Facilities	Number of Facilities Not In Program	No Exposure	SWPPP Required	Types of Construction Activities or Changes in Practice Obtain "No Exposure"
1	23	16	5	2	Canopies over vehicle fueling areas; construct sand shed, BMPs
2	18	2	12	4	Larger canopies over fueling stations; regrade yards; remove piles; second opinion needed to determine other necessary
3	18	14	2	2	Canopies over vehicle fueling areas; canopies over significant or remove catch basins and regrade yard to eliminate remove asphalt, raise catch basin, construct detention basin, bulk sand/salt mix pile into existing shed; regrade/reseed area to allow sheet flow across permeable wash area to drain to new detention basin/swale
4	18	9	5	4	Relocate wash areas and wash pads; remove pavement/ and regrade site in vicinity of material storage; provide CaCl tank; follow-up site visits may be required to determine
5	19	4	9	6	Drainage issues; fuel pumps, cover, etc.
6	13		12	1	Cover fuel site and eliminate point source ditch
Bridge Maint.	15	14	1		
Mechanical Services*	4			4	Evaluate vehicle parking area and provide drip pan drainage at fueling site; provide canopy and spill kit, and rework natural grass drainage swale
Traffic	1		1		New building being constructed which will protect recycling
Turnpikes	5			5	Construct new vehicle wash pads; construct building materials; construct full canopy covers over fuel dispensing
Totals	134	59	47	28	
Percentages	---	44	35	21	

* - Facility status data and recommended improvements for Satellite Garages located in Lancaster (District 1), Enfield (District 4), and North Hampton (District 6) is included in data for each of the corresponding Districts

**NPDES Phase II - Industrial Activities
Status Checklist for District 1 Patrol Sheds**

Shed ID #	Location	Not In Program	No Exposure	SWPPP	If Yes, What is Needed to Obtain "No Exposure"?
101L	PITTSBURG LOWER, NH	X			
101U	PITTSBURG UPPER, NH	X			
102	COLUMBIA, NH	X			
103	ERROL, NH		X		1
103	DIXVILLE NOTCH, NH	X			
104	GROVETON, NH		X		1
105	WEST MILAN, NH	X			
106	MILAN, NH	X			
D1-107	LANCASTER, NH		X		
107	WHITEFIELD, NH	X			
108	JEFFERSON, NH	X			
109	GORHAM, NH		X		1
111	TWIN MOUNTAIN, NH		X		
112	CRAWFORD, NH	X			
113	GLEN, NH	X			
113	PINKHAM NOTCH, NH			X	1, and sand shed, retention basin, and BMPs
114	LISBON, NH			X	Unattainable on this lot
115	LINCOLN, NH	X			
116	FRANCONIA, NH	X			
124	FRANCONIA, NH	X			
125	LITTLETON, NH	X			
125	DALTON, NH	X			
125	MONROE, NH	X			

Comments/Notes: 1 - Canopy over area vehicles park during fueling.

Signature: Dennis Croteau

Date: 8/20/2004

**NPDES Phase II - Industrial Activities
Status Checklist for District 2 Patrol Sheds**

<u>Shed ID #</u>	<u>Location</u>	<u>Not In Program</u>	<u>No Exposure</u>	<u>SWPPP</u>	<u>If Yes, What is Needed to Obtain "No Exposure"?</u>
201	ORFORD, NH		XXXX		
201A	LYME, NH	XXXX			
202	WENTWORTH, NH		XXXX		
203	RUMNEY, NH		XXXX		Would need second opinion.
204	NO. HAVERHILL, NH			XXXX	Needs a larger canopy over the fueling station
205	CANAAN, NH		XXXX		
206	BRISTOL, NH			XXXX	Need to rework the storage situation in regards to the drainage.
207	LEBANON, NH		XXXX		Would need a second opinion on this one.
210	ANDOVER, NH		XXXX		
210A	SPRINGFIELD, NH		XXXX		
211	FRANKLIN, NH		XXXX		
212	CORNISH, NH		XXXX		
213	SUNAPEE, NH			XXXX	Needs a larger canopy over the fueling station
214	NEW LONDON, NH		XXXX		
215	LEMPSTER, NH		XXXX		
215A	UNITY, NH	XXXX			
216	NEWBURY, NH		XXXX		
224	ENFIELD, NH			XXXX	regrading yard, revamping drainage, and moving piles around

Comments/Notes:

Signature: Doug King

Date: 8/30/2004

**NPDES Phase II - Industrial Activities
Status Checklist for NHDOT District 3 Patrol Sheds**

Shed ID #	Location	Not In Program	No Exposure	SWPPP	If Yes, What is Needed to Obtain "No Exposure"?
301	Rte. 112, Conway	X			
302	Rte. 16, Tamworth	X			
303	Rte. 153, Freedom	X			
304	N. Ashland Rd., Ashland	X			
305	new site Rte. 109, Moultonboro	X			
	prior site Rte. 25, Moultonboro	X			
306	Butterhill Rd., Chatham	X			
307	Old Rte. 28, Ossipee		X		
309	Rte. 106, Meredith	X			
310	Lily Pond Rd./Rte. 11, Gilford			X	1. Construct canopy over fuel pump area. 2. Construct canopies over significant material storage areas OR remove catch basins and regrade yard to eliminate point source and achieve sheet flow across permeable surfaces.
311	Rte. 109A, Tuftonboro		X		
312	Rte. 153, Wakefield	X			
313	Rte. 140, Belmont	X			
314	Rte. 106, Belmont	X			
315	Rte. 28, Alton	X			
316	Rte. 106, Loudon	X			
324	Rte. 104, New Hampton	X			
325	Rte. 3, Thornton			X	1. Construct canopy over fuel pump area. 2. Remove asphalt, raise catch basin inlet and reconstruct large swale at the southeast corner of site to create a detention basin/treatment swale for infiltration & sedimentation before runoff gets into closed drainage system. 3. Move the bulk sand/salt mix pile into existing shed until a new shed can be built. 4. Remove small asphalt swale and regrade area between fuel pumps and large swale to allow for sheet flow across permeable surface. 5. Relocate vehicle wash area to south side of patrol shed to drain to new detention basin/treatment swale.

Comments/Notes:

Facility Assessments have been completed but no SWPPP's have been prepared.

Prepared by: Jack Cilley & Lane Evans

Date: 8/19/04

**NPDES Phase II - Industrial Activities
Status Checklist for District 4 Patrol Sheds**

Shed ID #	Location	Not In Program	No Exposure	SWPPP	If Yes, What is Needed to Obtain "No Exposure"?
401	CHARLESTOWN, NH	X			
401A	WALPOLE, NH	X			
403	MARLOW, NH		X		
403A	ALSTEAD, NH	X			
404	HILLSBOROUGH, NH			X	Relocate wash area/wash pad
405	WESTMORELAND, NH	X			
405A	CHESTERFIELD, NH	X			
406	SWANZEY, NH	X			
407	STODDARD, NH	X			
408	HANCOCK, NH		X		
409	GREENFIELD, NH	X			
410	HINSDALE, NH	X			
411	TROY, NH		X		
412	MARLBOROUGH, NH			X	Construct berm and regrade in vicinity of material storage, wash pad, secondary containment for CaCl tank
413	RINDGE, NH			X	Remove pavement, wash pad
414	TEMPLE, NH			X	Remove pavement, wash pad
415	GREENVILLE, NH		X		
Dist. HQ	SWANZEY, NH		X		

Comments/Notes: No exposure will require adherence to policies and BMPs. Possible material relocations based on existing survey data and initial site visits may require additional site follow-up investigations.

Signature: C.R. Willeke

Date: 8/19/2004

**NPDES Phase II - Industrial Activities
Status Checklist for District 5 Patrol Sheds**

Shed ID #	Location	Not In Program	No Exposure	SWPPP	If Yes, What is Needed to Obtain "No Exposure"?
501	WARNER, NH		X		
503	CHICHESTER, NH			X	Drainage issues.
504	HENNIKER, NH		X		
505	BOW, NH		X		
506	ALLENSTOWN, NH		X		
507	GOFFSTOWN, NH	X			
508	HOOKSETT, NH	X			
509	CANDIA, NH		X		
510	MILFORD, NH			X	Fuel Pumps..cover etc.
511	BEDFORD, NH		X		
512	LONDONDERRY, NH		X		
513	RAYMOND, NH	X			
514	SALEM, NH		X		
515	HOLLIS, NH	X			
516	LONDONDERRY, NH		X		
525	CANTERBURY, NH			X	Drainage issues.
526	WARNER, NH			X	Fuel Pumps..cover, etc.
527	MANCHESTER, NH			X	Fuel Pumps..cover, etc.
528	DERRY, NH			X	Fuel Pumps..cover, etc.

Comments/Notes: Subject to interpretation of the rules and guidelines.

Signature: Pamela Mitchell

Date: 8/31/2004

**NPDES Phase II - Industrial Activities
Status Checklist for District 6 Patrol Sheds**

Shed ID #	Location	Not In Program	No Exposure	SWPPP	If Yes, What is Needed to Obtain "No Exposure"?
601	MILTON, NH		X		
602	STRAFFORD, NH		X		
603	ROCHESTER/GONIC, NH		X		
604	NORTHWOOD, NH		X		
605	LEE, NH		X		
606	DOVER PATROL, NH		X		
607	EXETER, NH		X		
608	EPPING, NH		X		
609	NEWFIELDS, NH		X		
610	RYE, NH		X		
611	SO. KINGSTON, NH		X		
612	NO. HAMPTON, NH			X	Cover fuel site and eliminate point source ditch.
615	KINGSTON, NH		X		

Comments/Notes:

Signature: Michael Burlage

Date: 8/12/2004

NPDES Phase II - Industrial Activities
Status Checklist for Bureau of Bridge Maintenance Facilities

Facility ID #	Location	Not In Program	No Exposure	SWPPP	If Yes, What is Needed to Obtain "No Exposure"?
CREW 1	LANCASTER, NH	X			
CREW 2	CARROLL, NH	X			
CREW 3	NEW HAMPTON, NH	X			
CREW 4	SUNAPEE, NH	X			
CREW 5	ALLENSTOWN, NH	X			
CREW 6	NEWFIELDS, NH	X			
CREW 7	ANTRIM, NH	X			
CREW 8	CHICHESTER, NH	X			
CREW 10	RUMNEY, NH	X			
CREW 11	EPPING, NH	X			
CREWS 12 & 15	PORTSMOUTH, NH		X		
CREW 13	FRANKLIN, NH	X			
CREW 13B	FRANKLIN, NH	X			
CREW 13N	NEW LONDON, NH	X			
CREW 14	BEDFORD, NH	X			

Comments/Notes:

Signature: Chuck Corliss

Date: 8/9/2004

NPDES Phase II - Industrial Activities **Status Checklist for Mechanical Services Facilities**

<u>Facility ID #</u>	<u>Location</u>	<u>Not In Program</u>	<u>No Exposure</u>	<u>SWPPP</u>	<u>If Yes, What is Needed to Obtain "No Exposure"?</u>
HIGHWAY GARAGE	CONCORD, NH			X	Evaluate vehicle parking area, provide drip pans where needed. At fuel site - evaluate storm water drainage.
SATELLITE GARAGE 2	ENFIELD, NH	See District 2 Information			
SATELLITE GARAGE	LANCASTER, NH	See District 1 Information			
SATELLITE GARAGE 6	NORTH HAMPTON, NH	See District 6 Information			
SATELLITE GARAGE 3	OSSIPEE, NH			X	Evaluate vehicle parking area, provide drip pans where needed. At fuel site - provide canopy and spill kit, and investigate need for berm.
SATELLITE GARAGE 4	SWANZEY, NH	See District 4 Information			
SATELLITE GARAGE 1	CARROLL/TWIN MOUNTAIN, NH			X	Evaluate vehicle parking area, provide drip pans where needed.
FUEL SITE	PITTSFIELD, NH			X	Canopy and spill kit. Rework grass swale of natural drainage.

Comments/Notes:

Signature: Willard A. Campbell

Date: 8/20/2004

**NPDES Phase II - Industrial Activities
Status Checklist for Bureau of Traffic Facilities**

Facility ID #	Location	Not In Program	No Exposure	SWPPP	If Yes, What is Needed to Obtain "No Exposure"?
HIGHWAY GARAGE	CONCORD		X		
(FACILITY 900)					

Comments/Notes: One concern brought up during our review of the site was the rain runoff from our recycled steel container went into a catch basin. We corrected the problem by moving the container and we are presently constructing a new building to further eliminate the concern by storing the container in the building.

Signature: John Corcoran Date: 8/18/2004

**NPDES Phase II - Industrial Activities
Status Checklist for Bureau of Turnpikes Facilities**

<u>Shed ID #</u>	<u>Location</u>	<u>Not In Program</u>	<u>No Exposure</u>	<u>SWPPP</u>	<u>If Yes, What is Needed to Obtain "No Exposure"?</u>
815	NASHUA, NH			X	2
820	MERRIMACK, NH			X	1, 2, 3
825	HOOKSETT, NH			X	1, 2, 3
830	HAMPTON, NH			X	1, 2, 3
835	DOVER, NH			X	2, 3

Comments/Notes: 1 - Construct vehicle wash pads

2 - Construct buildings for cold storage of bulk materials

3 - Construct full canopy covers over fuel dispenser sites

Signature: Harvey S. Goodwin

Date: 8/6/2004

Appendix G

BMP #6 – Winter Maintenance Activities

Appendix G

BMP #6 – Winter Maintenance Activities

The NHDOT began meeting in May 2004 to discuss the issues surrounding the use of road salt in the I-93 corridor communities. The Department facilitated the formation of large and small teams to investigate methods to reduce the use of salt along its highways. A listing of the meetings, the stakeholders in attendance and a summary of the topics presented is included in this appendix.

DATE	AUDIENCE	AGENDA SUMMARY
October 9, 2003		Kick-off Meeting
May 5, 2004	Large Team	*Determine team name *I-93 widening EIS commitment for education and outreach *Education/outreach done to date
May 13, 2004	Small Team	*Prepare a “draft “ education plan
May 25, 2004	Large “Salt-ed” Team	*Team name = “Salt-ed” *Update of TMDL and FEIS *Action items *Review and discuss the “draft” proposed education plan
September 21, 2004	Salt/I-93 Expansion Meeting/Discussion	Small “Salt-ed” Team and I-93 impacted communities (Storm Water Coordinators)
September 28, 2004	Small “Salt-ed” Team	*Discuss and summarize 9/21 meeting *Determine next steps
September 29, 2004	Anti-Icing Applications	UNHT2 workshop “Salt-ed” Team members present: Bill O'Donnell, Chris Jendras and Deb Loiselle
October 5, 2004	Large “Salt-ed” Team	*Overview of 9/21 meeting *Next steps *TMDL update *I-93 regional meetings (Fall/Winter)
November 3, 2004	New England Chapter APWA 2004 Snow and Ice Conference	Small “Salt-ed” Team members present: Deb Loiselle and Russ St. Pierre
November 10, 2004	Small “Salt-ed” Team	*Discussion of anti-icing and training with Paul Brown (Roadtech) *Discuss agenda for next Large “Salt-ed” meeting

	Paul Currier, Charlie Hood and Butch Waidelich)	*Use of salt "waste" as a brine resource *Recent workshops and discussion of Small "Salt-ed" group *Next Steps and date for next meeting
January 11, 2005	Small "Salt-ed" Team	*Steve Gray (guest speaker) presented powerpoint presentations that he has used to train NHDOT and Municipal employees on anti-icing and environmental issues associated with winter maintenance activities *Prepare action/work plan for the first training *Determine the target audience *Pilot program
January 25, 2005	Small "Salt-ed" Team and Steve Gray	*Continue discussions of a education work/action plan
February 1, 2005	Large "Salt-ed" Team	*Update of I-93 project *Update of TMDL *Brine use along I-93 corridor *Brine operations field trip *Proposed education and outreach for immediate future (presentation by Small "Salt-ed" Group)
March 2, 2005	Brine Showcase in Derry, NH (NHDOT patrol shed) Attendees: Bill Hauser, Charles Hood, Marc Laurin, Bill Cass, Deb Loiselle, Pam Mitchell, Mike Pillsbury, Steve Gray, Barbara McMillan, Paul Piesczek, Paul Currier, Chris Jendras, Doug Heath, Mark Kern	* Steve Gray and NHDOT patrol foremen provided an overview of the anti-icing concept. A field demonstration of the brine making and application were done on site.
March 7, 2005	Small "Salt-ed" Team	* Meet to discuss pre-plan for 3/14/05 meeting with the "pilot" community
March 14, 2005	Meeting with "pilot" community (Small "Salt-ed" Team and Paul Piesczek, and Windham Storm Water Committee)	*Introductions *Why we are here *Presentation of data *What NHDOT is doing to reduce salt use *What you can do for us/What we can do for you *Open discussion *Next steps