

SEP 26 2022

TOWN OF HUDSON
SELECTMEN'S OFFICE

Year 4 Annual Report
New Hampshire Small MS4 General Permit
Reporting Period: July 1, 2021-June 30, 2022

Please DO NOT attach any documents to this form. Instead, attach all requested documents to an email when submitting the form

Unless otherwise noted, all fields are required to be filled out. If a field is left blank, it will be assumed the requirement or task has not been completed. Please ONLY report on activities between July 1, 2021 and June 30, 2022 unless otherwise requested.

Part I: Contact Information

Name of Municipality or Organization:

EPA NPDES Permit Number:

Primary MS4 Program Manager Contact Information

Name:

Title:

Street Address Line 1:

Street Address Line 2:

City:

State:

Zip Code:

Email:

Phone Number:

Stormwater Management Program (SWMP) Information

SWMP Location (web address):

Date SWMP was Last Updated:

If the SWMP is not available on the web please provide the physical address:

Part II: Self-Assessment

First, in the box below, select the impairment(s) and/or TMDL(s) that are applicable to your MS4. Make sure you are referring to the most recent EPA approved Section 303(d) Impaired Waters List which can be found here: <https://www.epa.gov/tmdl/region-1-impaired-waters-and-303d-lists-state>

Impairment(s)			
<input checked="" type="checkbox"/> Bacteria/Pathogens	<input type="checkbox"/> Chloride	<input type="checkbox"/> Nitrogen	<input checked="" type="checkbox"/> Phosphorus
<input type="checkbox"/> Solids/ Oil/ Grease (Hydrocarbons)/ Metals			
TMDL(s)			
<input checked="" type="checkbox"/> Bacteria and Pathogen	<input type="checkbox"/> Chloride	<input checked="" type="checkbox"/> Lake and Pond Phosphorus	
			Clear Impairments and TMDLs

Next, check off all requirements below that have been completed. By checking each box you are certifying that you have completed that permit requirement fully. If you have not completed a requirement leave the box unchecked. Additional information will be requested in later sections.

Year 4 Requirements

Developed a report assessing current street design and parking lot guidelines and other local

requirements within the municipality that affect the creation of impervious cover, made it available as part of the SWMP, and:

No updates were recommended

Updates were recommended. The anticipated date or date of completion for updates is/was:

Developed a report assessing local regulations to determine the feasibility of making green

infrastructure practices allowable when appropriate site conditions exist, made it available as part of the SWMP, and:

No updates were recommended

Updates were recommended. The anticipated date or date of completion for updates is/was:

Identified a minimum of 5 permittee-owned properties that could potentially be modified or retrofitted with BMPs to reduce impervious cover

Optional: If you would like to describe progress made on any incomplete requirements listed above, provide an update on previous incomplete milestones, or provide any additional details, please use the box below:

A list of potential BMP retrofit sites is still developing with additional information being gathered and assessed in Year 5. In year 4, however, a new stormwater swale and pretreatment basin was constructed at the Town Transfer facility to improve stormwater treatment. Other potential stormwater BMP retrofit locations being evaluated include the proposed Police Station expansion and the Robinson Pond beach and boat launch parking lots. A more complete list of potential BMP sites is anticipated to be done in Year 5.

Annual Requirements

- Provided an opportunity for public participation in review and implementation of SWMP and complied with State Public Notice requirements
- Kept records relating to the permit available for 5 years and made available to the public
- The SSO inventory has been updated, including the status of mitigation and corrective measures implemented
 - This is not applicable because we do not have sanitary sewer
 - This is not applicable because we did not find any new SSOs
 - The updated SSO inventory is attached to the email submission
 - The updated SSO inventory can be found at the following website:

- Updated system map due in year 2 as necessary
- Provided training to employees involved in IDDE program within the reporting period
- Properly stored and disposed of catch basin cleanings and street sweepings so they did not discharge to receiving waters
- All curbed roadways were swept at least once within the reporting period
- Implemented SWPPPs for all permittee owned or operated maintenance garages, public works yards, transfer stations, and other waste handling facilities
- Enclosed all road salt storage piles or facilities and implemented winter road maintenance procedures to minimize the use of road salt
- Updated inventory of all permittee owned facilities as necessary
- O&M programs for all permittee owned facilities have been completed and updated as necessary
- Implemented all maintenance procedures for permittee owned facilities in accordance with O&M programs
- Implemented program for MS4 infrastructure maintenance to reduce the discharge of pollutants
- Inspected all permittee owned treatment structures (excluding catch basins)

Optional: If you would like to describe progress made on any incomplete requirements listed above or provide any additional details, please use the box below:

Approx 70-80% of the Town-owned stormwater BMPs were inspected in Year 4. The Town attempts to inspect 100% of the BMPs but certain BMPs were inspected at the tail end of the previous year and are planned in the current year 5.

Bacteria/ Pathogens (Combination of Impaired Waters Requirements and TMDL Requirements as Applicable)

Annual Requirements

*Public Education and Outreach**

- Annual message was distributed encouraging the proper management of pet waste, including noting any existing ordinances where appropriate
- Permittee or its agents disseminated educational material to dog owners at the time of issuance or renewal of dog license, or other appropriate time

- Provided information to owners of septic systems about proper maintenance in any catchment that discharges to a water body impaired for bacteria

** Public education messages can be combined with other public education requirements as applicable (see Appendix H and F for more information)*

Optional: If you would like to describe progress made on any incomplete requirements listed above or provide any additional details, please use the box below:

Phosphorus Impairment

Annual Requirements

*Public Education and Outreach**

- Distributed an annual message in the spring (April/May) encouraging the proper use and disposal of grass clippings and encouraging the proper use of slow-release and phosphorus-free fertilizers
- Distributed an annual message in the summer (June/July) encouraging the proper management of pet waste, including noting any existing ordinances where appropriate
- Distributed an annual message in the fall (August/September/October) encouraging the proper disposal of leaf litter

** Public education messages can be combined with other public education requirements as applicable (see Appendix H and F for more information)*

Good Housekeeping and Pollution Prevention for Permittee Owned Operations

- Increased street sweeping frequency of all municipal owned streets and parking lots subject to Permit part 2.3.7.a.iii.(c) to a minimum of two times per year (spring and fall)

Phosphorus Source Identification Report

- Completed the Phosphorus Source Identification Report
 - The Phosphorus Source Identification Report is attached to the email submission
 - The Phosphorus Source Identification Report can be found at the following website:

<http://www.hudsonnh.gov/bc-swc>

Potential structural BMPs

- Any structural BMPs already existing or installed in the regulated area by the permittee or its agents was tracked and the phosphorus removal by the BMP was estimated consistent with Attachment 3 to Appendix F. The BMP type, total area treated by the BMP, the design storage volume of the BMP and the estimated phosphorus removed in mass per year by the BMP were documented.

- The BMP information is attached to the email submission
- The BMP information can be found at the following website:

see explanation below in Optional text box

Optional: If you would like to describe progress made on any incomplete requirements listed above or provide any additional details, please use the box below:

A process for estimating and tracking phosphorus load reductions for existing and proposed BMPs installed by the Town is still being developed as part of the Robinson Pond Phosphorus Control Plan, which is expected to be more fully complete by the end of Year 5.

Lake and Pond Phosphorus TMDL

Defined the scope of the Lake Phosphorus Control Plan (LPCP). *Please select one of the following:*

- The PCP scope is the entire area within our jurisdiction discharging to the impaired waterbody
- The PCP scope is the urbanized area portion of our jurisdiction discharging to the impaired waterbody

Calculated baseline phosphorus, allowable phosphorus load, and phosphorus reduction requirement

Optional: If you would like to describe progress made on any incomplete requirements listed above or provide any additional details, please use the box below:

The Robinson Pond Phosphorus Control Plan has only been completed through the Year 4 requirements.

Optional: Use the box below to provide any additional information you would like to share as part of your self-assessment:

Part III: Receiving Waters/Impaired Waters/TMDL

Have you made any changes to your lists of receiving waters, outfalls, or impairments since the NOI was submitted?

- Yes
- No

If yes, describe below, including any relevant impairments or TMDLs:

Robinson Pond is listed for additional impairments for chlorophyll a, cyanobacteria and dissolved oxygen based on the 2022 state 303 (d) list of water quality impairments.

Part IV: Minimum Control Measures

Please fill out all of the metrics below. If applicable, include in the description who completed the task if completed by a third party.

MCM1: Public Education

Number of educational messages completed during this reporting period: 4

Below, report on the educational messages completed during this reporting period. For the measurable goal(s) please describe the method/measures used to assess the overall effectiveness of the educational program.

BMP: 1-1 Pet Waste Cleanup and Disposal

Message Description and Distribution Method:

The Town distributed pet waste cards developed by the Piscataqua Region Estuaries Partnership for the NH Stormwater Coalition during the dog licensing period from the Town clerk office and posted pet waste flyers at various locations to encourage residents to cleanup and properly dispose pet waste.

Targeted Audience: Residents

Responsible Department/Parties: Engineering / Town Clerk's Office

Measurable Goal(s):

Reduce the number of incidences where dog waste is left on the ground in commonly used dog walking locations such as Bensen's Farm.

Message Date(s): April 2022

Message Completed for: Appendix F Requirements Appendix H Requirements

Was this message different than what was proposed in your NOI? Yes No

If yes, describe why the change was made:

BMP:1-2 Grass Clippings & Fertilizer Messages

Message Description and Distribution Method:

The Town printed and distributed an educational post card produced by the UNH Cooperative Extension promoting proper turf maintenance protocols, grass clipping disposal and methods to reduce fertilizer usage

Targeted Audience: Residents

Responsible Department/Parties: Engineering / DPW/ Planning

Measurable Goal(s):

Increase awareness on ways to maintain lawns using less fertilizer and properly dispose grass clippings

Message Date(s): June 2022

Message Completed for: Appendix F Requirements Appendix H Requirements

Was this message different than what was proposed in your NOI? Yes No

If yes, describe why the change was made:

BMP:1-3 Septic Tank Maintenance & Pumping

Message Description and Distribution Method:

The Town printed and posted a "Get Pumped" brochure developed by NHDES to promote septic system pumping and increased maintenance. The brochure was handed out at the Town Conservation Comm booth during Old Home Weekend in early August

Targeted Audience: Residences

Responsible Department/Parties: Engineering / Cons Comm

Measurable Goal(s):

To increase awareness and encourage residents and businesses to pump their septic systems more frequently to prevent failures

Message Date(s): August 2021

Message Completed for: Appendix F Requirements Appendix H Requirements

Was this message different than what was proposed in your NOI? Yes No

If yes, describe why the change was made:

BMP: 1-4 Yard Waste & Leaf Litter Message

Message Description and Distribution Method:

The Town printed and distributed brochures highlighting the curb side leaf litter pickup in the fall and provided information for leaf litter disposal at the transfer station

Targeted Audience: Residents/ Businesses

Responsible Department/Parties: Engineering / DPW

Measurable Goal(s):

Increase the amount of leaf litter brought to transfer station instead of dumping in backyard areas

Message Date(s): Sept 2021

Message Completed for: Appendix F Requirements Appendix H Requirements

Was this message different than what was proposed in your NOI? Yes No

If yes, describe why the change was made:

[Empty text box for describing changes]

Add an Educational Message

MCM2: Public Participation

Describe the opportunity provided for public involvement in the development of the Stormwater Management Program (SWMP) during this reporting period:

The Town's Stormwater Management Plan and related stormwater documents are posted on the Town's web site.

Was this opportunity different than what was proposed in your NOI? Yes No

Describe any other public involvement or participation opportunities conducted during this reporting period:

During this reporting period, the Town Con Comm held at least two public meetings/hearings to educate residents on the scope of a water quality plan development grant and project for the Robinson Pond watershed. The Project is managed by the Nashua Regional Planning Commission.

MCM3: Illicit Discharge Detection and Elimination (IDDE)

Sanitary Sewer Overflows (SSOs)

Check off the box below if the statement is true.

This SSO section is NOT applicable because we DO NOT have sanitary sewer

Below, report on the number of SSOs identified in the MS4 system and removed during this reporting period.

Number of SSOs identified: 0

Number of SSOs removed:

MS4 System Mapping

Optional: Provide additional status information regarding your map:

Screening of Outfalls/Interconnections

If conducted, please submit any outfall monitoring results from this reporting period. Outfall monitoring results should include the date, outfall/interconnection identifier, location, weather conditions at time of sampling, precipitation in previous 48 hours, field screening parameter results, and results from all analyses. Please also include the updated inventory and ranking of outfalls/interconnections based on monitoring results.

- No outfalls were inspected
- The outfall screening data is attached to the email submission
- The outfall screening data can be found at the following website:

Below, report on the number of outfalls/interconnections screened during this reporting period.

Number of outfalls screened:

Below, report on the percent of total outfalls/ interconnections screened to date.

Percent of outfalls screened:

Optional: Provide additional information regarding your outfall/interconnection screening:

The Town stormwater outfalls were inspected and screened in the 2nd year of the permit and the results were submitted with the previous annual report. No illicit discharges or connections or Problem Outfalls were detected based on this screening.

Catchment Investigations

If conducted, please submit all data collected during this reporting period as part of the dry and wet weather investigations. Also include the presence or absence of System Vulnerability Factors for each catchment.

- No catchment investigations were conducted
- The catchment investigation data is attached to the email submission
- The catchment investigation data can be found at the following website:

Below, report on the number of catchment investigations completed during this reporting period.

Number of catchment investigations completed this reporting period:

Below, report on the percent of catchments investigated to date.

Percent of total catchments investigated:

Optional: Provide any additional information for clarity regarding the catchment investigations below:

Due to Covid related constraints and concerns, catchment investigations were delayed but are anticipated to began in year 5 and are fully expected to be completed by the permit established deadline. No Problem outfalls have been identified.

IDDE Progress

If illicit discharges were found, please submit a document describing work conducted over this reporting period, and cumulative to date, including location source; description of the discharge; method of discovery; date of discovery; and date of elimination, mitigation, or enforcement OR planned corrective measures and schedule of removal.

- No illicit discharges were found
- The illicit discharge removal report is attached to the email submission
- The illicit discharge removal report can be found at the following website:

Below, report on the number of illicit discharges identified and removed, along with the volume of sewage removed during this reporting period.

Number of illicit discharges identified: 0

Number of illicit discharges removed: 0

Estimated volume of sewage removed: 0 gallons/day

Below, report on the total number of illicit discharges identified and removed to date. At a minimum, report on the number of illicit discharges identified and removed since the effective date of the permit (July 1, 2018).

Total number of illicit discharges identified: 0

Total number of illicit discharges removed: 0

Optional: Provide any additional information for clarity regarding illicit discharges identified, removed, or planned to be removed below:

Employee Training

Describe the frequency and type of employee training conducted during this reporting period:

An employee training workshop focusing on IDDE and Good housekeeping measures was held on March 31, 2022.

Below, report on the construction site plan reviews, inspections, and enforcement actions completed during this reporting period.

Number of site plan reviews completed: 19

Number of inspections completed: 531

Number of enforcement actions taken: 0

Optional: Enter any additional information relevant to construction site plan reviews, inspections, and enforcement actions:

MCM5: Post-Construction Stormwater Management in New Development and Redevelopment

Ordinance or Regulatory Mechanism

Date update was completed (due in year 3): Chapter 290 Stormwater Management April 2020

As-built Drawings

Below, report on the number of as-built drawings received during this reporting period.

Number of as-built drawings received: 6

Optional: Enter any additional information relevant to the submission of as-built drawings:

Retrofit Properties Inventory

Below, list the permittee-owned properties that could be modified or retrofitted with BMPs to mitigate impervious areas (at least 5):

Police Station
 Transfer Station
 Bensen Park
 Robinson Pond Beach Area
 Robinson Pond Boat Launch Area

MCM6: Good Housekeeping

Catch Basin Cleaning

Below, report on the number of catch basins inspected and cleaned, along with the total volume of material removed from the catch basins during this reporting period.

Number of catch basins inspected: 291

Number of catch basins cleaned: 291

Total volume or mass of material removed from all catch basins: 534 cubic yards

Below, report on the total number of catch basins in the MS4 system.

Total number of catch basins: 2,900

If applicable:

Report on the actions taken if a catch basin sump is more than 50% full during two consecutive routine inspections/cleaning events:

Street Sweeping

Report on the number of miles swept during this reporting period below.

Number of miles cleaned: 281

Report either the volume or weight of street sweeping materials collected during this reporting period below.

Volume of material removed: 974 cubic yards

Weight of material removed: [Select Units]

Stormwater Pollution Prevention Plan (SWPPP)

Below, report on the number of site inspections for facilities that require a SWPPP completed during this reporting period.

Number of site inspections completed: 8

Describe any corrective actions taken at a facility with a SWPPP:

Inspection at the Public Works facility in the 1st Qtr of 2021 noted sand piles needed cleaning up and the sand stockpile area experienced some spillover, which were rectified.

Additional Information

Monitoring or Study Results

Results from any other stormwater or receiving water quality monitoring or studies conducted during the reporting period not otherwise mentioned above, where the data is being used to inform permit compliance or permit effectiveness must be attached.

- Not applicable
- The results from additional reports or studies are attached to the email submission
- The results from additional reports or studies can be found at the following website(s):

If such monitoring or studies were conducted on your behalf or if monitoring or studies conducted by other entities were reported to you, a brief description of the type of information gathered or received shall be described below:

Additional Information

Optional: Enter any additional information relevant to your stormwater management program implementation during the reporting period. Include any BMP modifications made by the MS4 if not already discussed above:

COVID-19 Impacts

Optional: If any of the above year 4 requirements could not be completed due to the impacts of COVID-19, please identify the requirement that could not be completed, any actions taken to attempt to complete the requirement, and reason the requirement could not be completed below:

Activities Planned for Next Reporting Period

Please confirm that your SWMP has been, or will be, updated to comply with all applicable permit requirements including but not limited to the year 5 requirements summarized below. (Note: impaired waters and TMDL requirements are not listed below)

Yes, I agree

Annual Requirements

- Annual report submitted and available to the public
- Annual opportunity for public participation in review and implementation of SWMP
- Keep records relating to the permit available for 5 years and make available to the public
- Properly store and dispose of catch basin cleanings and street sweepings so they do not discharge to receiving waters
- Annual training to employees involved in IDDE program
- Update inventory of all known locations where SSOs have discharged to the MS4
- Continue public education and outreach program
- Update outfall and interconnection inventory and priority ranking and include data collected in connection with the dry weather screening and other relevant inspections conducted
- Implement IDDE program
- Review site plans of construction sites as part of the construction stormwater runoff control program
- Conduct site inspection of construction sites as necessary
- Inspect and maintain stormwater treatment structures
- Log catch basins cleaned or inspected
- Sweep all curbed streets at least annually
- Continue investigations of catchments associated with Problem Outfalls
- Implemented SWPPPs for all permittee owned or operated maintenance garages, public works yards, transfer stations, and other waste handling facilities
- Review inventory of all permittee owned facilities in the categories of parks and open space, buildings and facilities, and vehicles and equipment; update if necessary
- Review O&M programs for all permittee owned facilities; update if necessary
- Implement all maintenance procedures for permittee owned facilities in accordance with O&M programs
- Implement program for MS4 infrastructure maintenance to reduce the discharge of pollutants
- Enclose all road salt storage piles or facilities and implemented winter road maintenance procedures to minimize the use of road salt
- Review as-built drawings for new and redevelopment to ensure compliance with post construction bylaws, regulations, or regulatory mechanism consistent with permit requirements
- Inspect all permittee owned treatment structures (excluding catch basins)
- Identify additional permittee-owned properties that could potentially be modified or retrofitted with BMPs to reduce impervious areas so that the permittee maintains a minimum of 5 sites in their inventory, until such a time when the permittee has less than 5 sites remaining

Provide any additional details on activities planned for permit year 5 below:

The Town is currently working with Nashua Regional Planning Commission to develop a Water Quality Improvement Plan for Robinson Pond that is targeted for completion at the end of 2023. This Plan is likely to

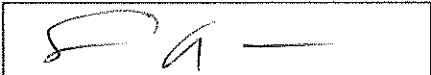
include recommendations for stormwater treatment measures for select areas within the watershed as well as non-structural measures.

Part V: Certification of Small MS4 Annual Report 2021

40 CFR 144.32(d) 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, I certify that 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.

Name: STEPHEN A. MACIZIA Title: Town Administrator

Signature:  Date: 9/27/22

[Signatory may be a duly authorized representative]

