



TOWN OF HUDSON
Board of Selectmen

NHR041013

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



April 5, 2006

Thelma Murphy
Storm Water Coordinator
US Environmental Program Agency
Water Technical Unit
PO Box 8127
Boston, MA 02114

Re: MS-4 – Annual Report for the Town of Hudson, NH
Permit No. NHR041013

Dear Ms. Murphy:

Enclosed is the annual report for May 1, 2006, Town of Hudson, NH.

We continue to make minor adjustments to be more realistic, but are still on schedule for the five-year implementation.

Sincerely,

HUDSON BOARD OF SELECTMEN

Richard J. Maddox
Chairman

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

NPDES - STORMWATER II

ANNUAL REPORT

APRIL 1, 2006

(For work efforts through April 1, 2006)

I. PERMIT NUMBER NHR041013

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

BMP 3-1 Illicit discharge detention & elimination

Our first year effort under contract to the NRPC had limited success. Our initial program was to be the first year of a five-year program to map our entire drainage system(s). Our contractor fell well short of meeting our expected first year goal.

We have now purchased our own GPS system and will be hiring two (2) college interns for the next two summer seasons to complete the outfall locations cataloging.

III. OTHER NOTABLES:

The Town Engineer, Community Development Director, and Town Planner continue to be involved with the Regional Stormwater group. This group meets at NRPC typically once every two to three months.

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

EPA representatives visited the town in September 2005 and with the town engineering staff, they visited about six construction sites. Overall the representatives appeared satisfied with the efforts the town is making regarding construction inspections and enforcement.

A draft copy of the proposed Stormwater Ordinance was also provided to the EPA representatives. This was reviewed and comments have been incorporated with the ordinance.

IV STATUS OF BMPS

Task 1. Public Education

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

Responsible person(s) Town Engineer.

Measurable goal: Information posted and maintained/updated annually.

Status: Two existing Kiosks one at Musquash Reserve and one at Robinson Pond boat landing are being updated annually with various stormwater information.

 Information is also posted at the Town Hall in three locations.

Future goals: The above sites will be continued, with annual change outs.

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

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

Measurable goal(s): Document information being distributed and schedule of distribution.

Status: Two videos have been obtained one from NHDES and one from EPA. These were shown on cable TV, local access during at least one period over the last year.

 5,000 trifold were prepared for us in 2005. These contain simple "do's and don'ts". These are provided as handouts at the Town Highway Department and at three locations in the Town Hall.

Future goal(s): Continue to promote trifold information at existing sites. Continue to show videos on local access TV two times per year. We will now be mailing out trifolds with our next quarterly sewer bills.

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

Responsible person(s): Director of Community Development.

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

Status: Web page section for stormwater program was developed and included on Town web pages in 2005.

Future goal: Web page will be reviewed annually and updated as appropriate.

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

Responsible person(s): Director of Community Development

Measurable goal(s): Provide two articles.

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

Future goal(s): Place a second feature section in the Annual Town Report in the next two years.

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

Responsible person (s): Friends of Hudson Natural Resources/Robinson Pond Improvement Council.

Measurable goal(s): Distribute information to residence and maintain Robinson Pond kiosk.

Status: This program has been ongoing since 2001 as part of the "Robinson Pond nonpoint implementation project" (also see BMP 3-5)

This program is funded through grants from the NHDES "small outreach and education grants program".

Future goal(s): Continue program. Copies of files are kept at the Engineering office.

BMP 1-6: "Implement Stormwater Committee"

Responsible person(s): Town Engineer, Community Development Director, Town Planner, Town Engineering Inspector, Road Agent and Sewer and Drain Supervisor.

Measurable goal(s): Meet monthly in 2005 and at least bi-monthly thereafter to plan and evaluate BMP implementations.

Status: Committee made up of staff noted above was officially authorized by the Board of Selectmen in 2004. Committee meets bi-monthly. Meeting minutes are on file with the Stormwater files.

Future goal(s): To continue meetings for the foreseeable future bi-monthly.

Task -2 Public Participation

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

Responsible Person(s) Road Agent

Measurable goal(s): Regional hazardous waste collection days are held annually with drop-off located at the Nashua DPW garage.

Waste oil drop off is available at the Highway Garage during regular business hours (7:00am to 3:00pm).

Status: Hazardous waste collection days were held Five (5) times, April through November in 2005.

The Town of Hudson's local cable TV showed an announcement prior to each date. These dates were also announced through an informational trifold, published by the Town of Hudson Highway Department.

The summary of regional collection participation by Towns is on file.

Future Goal(s): The schedule 2006 has not yet been published by the NRPC. Presently a new recycling vendor is being solicited by NRPC. Continuation of this program is expected

BMP 2-2: The Town cleanup days, leaves, brush, building materials, scrap metal collect at West Road site.

Responsible person(s): Road Agent

Measurable goal(s): Eight cleanup days per year.

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

Future goal(s): Collection has been ongoing for many years and will continue. Mailing notice is updated each year.

BMP 2-3: Provide a hotline for public comments & illicit discharge complaints.

Responsible person(s): Director of Community Development

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

Status: Hotline has been set up and noticed in the Web page. A telephone number is also advertised.

A complaint/action form is kept on file at the Community Development office.

Future goal(s): Maintain "Hotline" number. Maintain complaint/action form at Community Development office. Advertise periodically on cable.

BMP 2-4: Continue curbside recycling collection Program.

Responsible person(s): Road Agent.

Measurable goal(s): Recycling collected

Status: Hudson utilizes curbside trash collection and recycling collections. This continues weekly. The Hudson Highway Department keeps an ongoing log of collections. Copies of these are included in the Stormwater files.

BMP 2-5: Continue to follow public notification guidelines.

Responsible person(s): Director of Community Development

Measurable goal(s): Guidelines followed.

Status: Hudson follows a standard public notification process of Town committee meetings and public activities. These are published on bulletin boards and are also posted on the Town web site calendar agendas for meetings.

Future goal(s): To continue notification activities.

BMP 2-6: Solicit public comment on annual report.

Responsible person(s): Director of Community Development

Measurable goal(s): Annual reports summarized and available for Public comment. Number of comments received.

Status: No comments locally have been received.

Future goal(s): This annual report will be kept on file for local public viewing at the Community Development office. It's existence and location will be identified on the web page and public viewing and comments will be invited.

Task 3 – Illicit discharge detection and elimination.

BMP 3-1: Map outfalls and receiving waters.

Responsible person(s): Town Engineer

Measurable goal(s): By end of 5-year permit term outfall mapping to Be completed.

Status: Our first year contract with NRPC to map our drainage system had limited success. We have changed direction. Using our GIS and GPS the engineering office is hiring college interns to map out the outfalls. A hard copy description of each outfall will be prepared and placed in our files. A standard form has been developed.

Future goal(s): Outfalls will be identified and located over the Next two-years. Outfalls will be identified by a unique number and cataloged.

Watershed maps will be cross-referenced to the outfall cataloging.

BMP 3-2: Develop effective storm sewer bylaws.

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

Measurable goal: Bylaws developed and presented to Selectmen.

Status: A final draft of the proposed bylaws was provided at our March Stormwater committee meeting by our consultant. Draft has been reviewed by EPA staff. Proceed through legal review and public hearing.

The draft has been reviewed by staff and EPA New England Region Representatives. Comments have been incorporated by our consultant. Review by legal counsel is underway. A public hearing for adoption will follow.

Future goal(s): Adopt bylaws for summer of 2006.

BMP 3-3: Dry weather screening of outfalls.

Responsible person(s): Town Engineer

Measurable goal(s): Number of outfalls screened.

Status: Outfall inspections were delayed.
(See BMP.3-1 above).

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

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

Future goal(s): Outfall inspections (visual) will begin summer 2006; We hope to screen all outfalls every three-years on a rotating basis.

The Merrimack River is annually tested for water quality by Lower Merrimack River Local Advisory Committee we received copies of their reports that are also on file at NRPC. We have copies of the NHDES outfall cataloging for the Merrimack River on file.

BMP 3-4: Develop and implement system for elimination of illicit discharges.

Responsible person(s): Town Engineer & Road Agent and Highway Supervisor.

Measurable goal(s): System developed and implemented.

Status: Hudson has Sewer and Drain Division personnel who through visual inspection and video camera (for pipe inspection) has and will continue detection and correction of illicit discharges.

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

BMP 3-5: BMP 3-5: “continue monitoring of Robinson Pond and its watershed.”

Responsible person(s): Friends of Hudson Natural Resources

Measurable goal(s): Annual monitoring data for 11 sites along Robinson Pond and in watershed.

Status: Monitoring has been undertaken since 2001. This is part of the “Robinson Pond nonpoint implementation project,” (also see new BMP 1-5).

Future goal(s): To continue program, copies of annual results are kept at the Engineering office.

Control measure 4: Construction site run-off control.

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

Responsible person(s): Town Engineer & Town Planner

Measurable goal(s): Independent review of all plans.

Status: For many years the process of independent plan review has been in place. This has always included drainage and stormwater.

Every private site project is processed through this review process. Files for each are maintained at the engineering and planning offices.

Future goal(s): To continue the program and incorporate updated regulations (BMP.3-2).

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

Responsible person(s): Town Engineer

Measurable goal(s): Draft and present bylaws.

Status: This effort is part of BMP 3-2.

Future goal(s) To review and adopt bylaws by summer of 2006.

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

BMP 4-4: Receive and consider public comment.

Responsible person(s): Director of Community Development

Measurable goal(s): Maintain web page hotline for comments.

Status: Hotline telephone number has been identified and advertised on Town web page (see BMP 2 -3). No comments have been received this year.

Future goal(s): Continue to solicit comments and evaluate any ideas.

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

Responsible person(s): Town Engineer & Engineering Inspector.

Measurable person(s): Inspections conducted and documented.

Status: The Town has an ongoing inspection process for subdivisions and site plans. This includes ongoing inspection of stormwater and erosion control measures with documentation maintained at the Town engineering office. During construction season inspections are typically done weekly and after each significant rain event.

This effort has been upgrade as follows:

- Reports pertinent to stormwater management and erosion control inspections have been copied to the SWPPP files;
- Digital pictures are now being taken from time to time and are used to help document problems and corrections. These are being copied to the SWPPP file;
- Copies of NOI's and Stormwater Management plans are now being requested. We are accessing the EPA website to check each sites NOI status;

Future goal(s): To continue the same effort with upgrades in effectiveness as knowledge and technology allows.

To update documentation of SWPPP with NOI's, NOT's through the EPA website.

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

BMP 4-6: Enforce site permits and ordinances.

Responsible person(s): Town Engineer, Engineering Inspector, Code Enforcement Officer, and Director of Community Development..

Measurable goal(s): Permits and ordinances enforced.

Status: In conjunction with BMP 4-5 permits and Stormwater management requirements and wetlands protection are monitored and enforced.

Pre construction meetings are required for most subdivisions and site plans. In 2003 a checklist for this meeting was developed which includes notification of the engineering department of the NOI submittal, state permits and local wetland permits.

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

- Two wetlands buffer fines were issued in January of 2006;
- Six citation letters were sent out in 2005. With follow-up remediation actions required. Two of these continued to be followed up on;

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

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

Task 5: Post Construction Runoff Control

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

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

Measurable goal(s): Ordinance on file.

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

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

A new development called Nadeau Farm preserve is presently being reviewed by the Planning board. This development provides for connected farm lots with homes strategically placed on 5-plus acre lots to maximize continuous open farming space.

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

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

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

Measurable goal(s): Draft and present bylaws in spring 2006.

Status: See BMP 3-2 & 4-2.

Future goal(s): Review and adopt bylaws by spring 2006.

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

Responsible person(s): Town Engineer

Measurable goal(s): BMP manual selected

Status: NHDES Guidebook – Stormwater Management and Erosion and Sediment Control Handbook for Urban and Developing Areas in New Hampshire has been selected.

Future goal(s): This manual is kept in file for reference with our Stormwater Management Plan. It is used for review of new subdivisions and site plans.

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

Responsible person(s): Road Agent & Town Engineer

Measurable goal(s): Existing structural BMP's public and private will be cataloged:

- Maintenance goals for public structural BMP's are developed. Structural BMP's are cataloged;
- Recommend maintenance needs to private BMP owners;

Status: The cataloging of structural BMP's will be done as part of BMP 3-1 and 3-3, mapping of out falls and drainage system.

Future goal(s): Over the next two-years implementing the cataloging will be accomplished.

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

Maintenance recommendations for privately owned structural BMP's will be communicated with reminders every 2-years once they are cataloged. Notes on site plans will be incorporated to help obligate private owners to follow through.

Task 6: Good Housekeeping

BMP 6-1: Identify sensitive receptors

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

Measurable goal(s): Receptors identified and mapped.

Status: Sensitive receptors are Ottarnic Pond and the Merrimack River (see BMP 2-3).

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

BMP 6-2: Continue employee training program.

Responsible person(s): Department Heads.

Measurable goal(s): Continue annual training for Town personnel.

Status: The first training was done with Highway Department in fall of 2004.

5 Employees attended the Stormwater statewide conference in Merrimack, NH in January 2005.

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

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

BMP 6-3: Sweep each street annually.

Responsible person(s): Road Agent

Measurable goal(s): Streets swept annually.

Status: The Town owned streets sweeper operates continually spring, summer and fall.

All streets are swept at least once annually. Downtown urban areas are swept more frequently. Monthly logs are being maintained.

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

Future goal(s): Continue program.

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

Responsible person(s): Road Agent

Measurable goal(s): Calibration occurs annually.

Status: This is an ongoing process with the Highway Department.

Future goal(s): Continue program.

BMP 6-5: Maintain oil/water separator at DPW garage. Wash water discharge to sewer & recycle used oil.

Responsible person(s): Road Agent

Measurable goal(s): Inspect and maintain separator.

Status: Facility has passed EPA self audit (record on file @ Highway department). Oil/water separator is inspected at least twice per year and cleaned at least once per year.

We have now included oil-recycling data to this program. Oil recycling of in-house and for public has been part of ongoing Highway Department efforts (also refer to BMP 2-1).

Vehicles are washed inside garage at Police sally port, Highway Department and private vehicle wash facilities.

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

BMP 6-6: Clean each catch basin once every three years.

Responsible person(s): Highway Supervisor & Road Agent

Measurable goal(s): Clean catch basins.

Status: The Highway department has a long standing program for catch basin cleaning which is being continued. This program will be expanded to municipally owned structural BMP's (BMP 5-4) once these have been identified.

Future goal(s): Maintenance logs are being kept beginning spring 2004.

BMP 6-7: Continue to log hazardous waste materials and store properly.

Responsible person(s): Road Agent

Measurable goal(s): Materials logged and stored

Status: Same

Future goal(s): Continue program.

BMP 6-8: Evaluate physical conditions, site design, and Best Management Practices to promote groundwater recharge.

Responsible person(s): Town Engineer, Road Agent, and Director of Community Development and Town Planner.

Measurable goal(s): Show evaluation of applicability and inclusion where possible for future development.

Status: This is being encouraged in new development designs where applicable. Design plans and review documentation are on file at the Planning Department.

Future goal(s): To continue inclusion as applicable.

To add more emphasis through new bylaws BMP 5-2, 4-2 & 3-2.

