



**City of Nashua, NH
NPDES Phase II Small MS4
General Permit No. NHR041021**

2010 Annual Report

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Municipality/Organization: City of Nashua, NH

EPA NPDES Permit Number: NHR041021

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

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: Leon Kenison, P.E.

Title: Director, Division of Public Works

Date: April 30, 2010





Introduction

This is the seventh annual report to comply with the conditions of the 2003 Small MS4 General Permit. The City of Nashua is anticipating the reissuance of the Small MS4 General Permit for New Hampshire later this year.

After reviewing the proposed 2008 Permit and noting changes that are to be made for the next permit cycle, in advance of the approved 2008 Permit, the City addressed the need to complete a culvert inventory. Two engineering interns were hired during the summer of 2009 to locate, document, inspect and evaluate the culverts in the city. Work orders were generated for culverts needing cleaning or repair. In addition, two temporary laborers were hired to provide the debris removal and cleaning services.

The City continues to experience a lack of funding dedicated to providing maintenance to culverts, wetlands, brooks, catch basins, and drain lines and capital improvements to the drainage system. While the City has a sewer user fee, these funds should be directed only to the sanitary and combined sewer system, not the storm drainage system. In addition, federal mandates by the NPDES Phase II Stormwater permit have placed further requirements relating to stormwater upon the City. Knowing that legal authority was given to NH municipalities in 2008 to form stormwater utilities under RSA 149-I, the city applied for and received a grant from the NH Department of Environmental Services to complete a Stormwater Utility Feasibility Study. Using some city funds as well as the grant, the City hired a consultant to conduct the feasibility study. The study is expected to be completed during the next permit period.

Part I. Self-Assessment

CSO Program

The City of Nashua is under an EPA Consent Decree (Civil Action No. 05-376-PB), dated December 26, 2005 (based on the Long-Term Water Quality and Infrastructure Control Plan), to mitigate Combined Sewer Overflows (CSOs). Currently, there are eight CSO outfalls that are a part of the city's sewer collection system, four that discharge to the Nashua River and four that discharge to the Merrimack River. CSOs have been identified as a probable source for the *Escherichia coli* impairment of the portions of the Nashua and Merrimack Rivers located nearest to the city, as identified in Appendix A of this report. Several projects related to the Consent

Decree, and are discussed below, are ongoing and will reduce the amounts of CSOs occurring in the Nashua and Merrimack Rivers.

The 60 MGD Wet Weather Flow Treatment Facility (WWFTF), located at the Nashua Wastewater Treatment Facility, to capture and treat combined (sanitary and stormwater) flow is now online, reducing the occurrence of CSOs and the volume of combined flows that is discharged to these rivers. Also, more urban stormwater runoff from approximately 30 percent of the City, which is part of the combined flow, will now be conveyed to the WWFTF where it will be treated before being discharged to the Merrimack River.

The construction of improvements to five of the existing CSO regulators (003, 004, 007, 008, and 009) in order to optimize storage in the collection system and/or to minimize or eliminate combined sewer discharges for certain storm events, as required by the Consent Decree, was completed during this reporting period. Three of the CSOs are located on the Nashua River and two are located on the Merrimack River. These optimization measures also allow more combined flow to be conveyed to the new WWFTF. A construction task included with the CSO 008 improvements included removing trash and debris along the bank of the Nashua River.

An evaluation as to whether storage tanks are needed at CSO 003 and CSO 004 is underway. The proposed storage tanks would reduce the amount of combined sewerage discharging to the Merrimack River. Preliminary analyses indicate that the sewer separation work completed upstream of CSO 003 has greatly reduce the volume of combined sewerage so that no storage tank will be needed at CSO 003 to contain overflow up to a 2 year storm event. Evaluation of the needed infrastructure near CSO 004 continues.

Near the CSO 006 regulator, a design of an automated sluice gate near the CSO 006 junction chamber to control flow during wet weather events is underway. With the addition of a sluice gate at this location, excess volume in the 108" Nashua River Interceptor can be used to store combined flow. The design was completed in March 2010 with construction to be completed during the next reporting period.

Drop over structures constructed on the North Merrimack River Interceptor will reduce discharges at CSO 005 by allowing combined sewage flow from a 2-year and higher storm event in sewer pipes on East Hollis and Crown Street to flow directly into the larger interceptor that flows directly to the wastewater treatment plant. Design of this project was completed in February 2010 with construction to be completed during the next reporting period.

Separation of a combined sewer in the Harbor Avenue area will reduce the volume of combined sewage flowing to the CSO 005 regulator and reduce localized flooding. Stormwater will be captured and treated prior to being discharged into Salmon Brook. This project is in design with a construction completion date of October 2012.

In addition to the Consent Order related projects, a sewer separation project in the Haines Street area was designed and construction started during this reporting period. Stormwater from this 21

acre drainage basin will be removed from the combined system. Hoods are being installed in the catch basins to treat the stormwater prior to it being discharged to Salmon Brook through an existing outfall.

Also, improvements to a culvert that carries Harris Brook are being designed. During large rain events, the flow in the brook overtops the roadway, picking up road debris, that is carried back into the brook system.

Public Education and Participation

The City continues to be a member of the Nashua Stormwater Coalition. The Nashua Regional Planning Committee (NRPC) was unable to continue their involvement with the coalition. Discussions were held with the New Hampshire Department of Environmental Services to regroup the coalition and provide leadership. Meetings were scheduled for the next reporting period.

As one of the last projects with the NRPC, the Nashua Stormwater Coalition provided funding to NRPC to develop an educational curriculum project that would include stormwater management education with the statewide curriculum lesson plans. This project is still ongoing, with contacts being made with educators in each of the regional communities. It is expected that this project will be completed in the next reporting period.

The Enviroscape Watershed/Non-point Source Model was used as part of a stormwater education program. The model was used to educate the public about watersheds and nonpoint source pollution during a Green Team Fair at the Amherst Street Elementary School. The model will continue to be used in classroom presentations and public events in the next permit period.

The Paulie the Pickerel "Let Only Rain go down the Storm Drain" logo continues to be used for marketing the stormwater management program in the City. Magnets with the logo continue to be distributed during educational presentations. Door hangers containing information about stormwater dos and don'ts were distributed during presentations and are available in locations frequented by residents in City Hall and other public buildings.

The Nashua Green Team continues to meet and engage residents, businesses and others in discussions to make Nashua a Green City. Education about stormwater and water bodies is an important element of these efforts and several schools have participated in projects throughout the city.

The Mine Falls Park Advisory Committee sponsored six Trail Days during the period. In addition to general park maintenance, trash and debris were removed from the waterways and banks of the Nashua River, Nashua Canal and Mill Pond.

An update of stormwater issues was presented at each of the monthly meetings of the Board of Public Works. The Board of Public Works is a five member body of the elected officials that are

responsible for the overall direction and performance of the Division of Public Works. This is a public meeting that is recorded and broadcasted repeatedly on the government access channel. The stormwater update discusses city-wide drainage issues, capital project needs, the progress of the stormwater utility and any other items that are related to stormwater.

Illicit Discharge Detection and Elimination

Field verification of outfalls on small brooks and ponds continued. The Geographic Information System (GIS) mapping program of outfalls was updated with new information and corrected when discrepancies were found.

New aerial photography including using Color Infrared Imagery was initiated during this reporting period. When complete, calculation of impervious surface for each parcel will be possible. This information will be used for better land use planning, in more comprehensive design of stormwater systems and in the development of the stormwater utility fee. The final product will be delivered during the next reporting period. This information will become part of the GIS mapping including the aerial photography and the impervious layer.

A culvert inspection program was developed during this reporting period. Using summer engineering interns, over 300 culvert locations were located, documented and inspected. The GIS mapping system was updated with accurate culvert information based on the field verification. Where necessary, maintenance work orders were generated using the IntelliGov system. As a part of the culvert inspection program, summer laborers were hired to address the numerous work orders to remove debris and vegetation near the culverts.

Design of a new inlet structure on Lincoln Brook was completed and construction started during this reporting period. This new structure will prevent the culvert from being blocked with debris.

Construction Site and Post-Construction Runoff Control

The Planning Department staff actively implements the provisions on the stormwater management ordinance during the development review process, for both new development and redevelopment projects. Erosion control measures including siltation fencing and other best management practices are shown on plan details and implemented during all phases of the construction process. The annual stormwater reporting requirements are implemented on sites such as the sweeping of parking lots, cleaning of catch basins and other specific details as shown on the plans. Approval of sites requires the recording at the registry of deeds the stormwater management plan for each site.

During the plan review process staff continues to make recommendations on improving the quality of landscaping plans submitted. The planting of vegetative materials helps to improve stormwater quality. In addition the Nashua Planning Board has engaged in discussions on landscaping standards and efforts to protect existing trees during the construction process. Additional notes and stipulations of approval include the placement of construction fencing to

protect mature trees and other vegetation. Wetland Buffer Markers continue to be required to be installed in the buffer areas of impacted wetlands by the Nashua Conservation Commission when proposed developments include wetland impacts. The purpose of the markers is to encourage residents not to dump debris in wetland areas. An additional step in the plan review process for areas in the drinking water watershed, that is land tributary to Pennichuck Brook, is the review and approval by the public water engineering staff.

The Nashua Conservation Commission hired a consultant to inspect the conservation lands and easements within the City. Many of these parcels include wetlands. Documentation was provided on outfalls in these parcels and suspect discharges were conveyed to DPW. Public awareness via contact with property owners and other residents of the community while the consultants are in the field and updates at the Nashua Conservation Commission, which are publicly noticed meetings, helped to create awareness about these important ecosystems and the need for good stormwater management. This project was completed in November 2009.

The preliminary design of the widening of Route 101A located in the drinking watershed of the Pennichuck Brook system is complete. The design incorporated treatment of any new stormwater generated. The design proposes improvements to two existing detention ponds.

Good Housekeeping

Good housekeeping measures included the continuous street sweeping program. Sweepers operate 16 hours a day on week days from April 1 to June 1 and 8 hours per day until December 1. Winter salt and sand use was monitored and controlled.

A pole camera with zoom capabilities was purchased by the Wastewater Department in order to quickly assess potential deficiencies in stormwater infrastructure and trace potential illicit discharges.

The Division of Public Works Parks Department continues its practice of Integrated Pest Management (IPM) principles and reduced the amount of pesticides that were applied. Also, the department is experimenting with turf growth regulators to reduce the amount of fertilizer and water that is needed on the fields.

Engineering summer interns located, documented and inspected over 30 detention ponds that are the City's responsibility to maintain. These locations were added to the GIS mapping and work orders were generated using the IntelliGov system, as necessary.

The IntelliGov Work Order Management System continues to be used to track work orders. This system allows entering and tracking of all work orders within the Division of Public Works, many of which are related to stormwater management.

Additional activities completed during the permit period are included in Part II of this report.

Impaired Waters

To address Part I.C.1 of the City's General Permit, Table A is included in Appendix A. Listed on Table A are the water bodies within the City limits that are on the NHDES Draft 2010 List of Threatened or Impaired Waters that require a TMDL (303(d) list). Included in the table is the Best Management Practice to address the cause of impairment.

No TMDL has been approved for any water body into which the City of Nashua discharges, as required of Part I.D. The schedule for required TMDLs is listed in Table A, located in Appendix A.

Permit Compliance

The City of Nashua has completed the required self-assessment and is in compliance with permit conditions.

Part II. Summary of Minimum Control Measures

The summary of the activities completed in Permit Year 7 of the six Minimum Control Measures is listed on the attached table, Part II Summary of Minimum Control Measures. Planned activities for the next permitted year, April 2010 through March 2011, are also listed. Revisions to the Best Management Practices have been noted in the table.

BMP ID#	Best Management Practice	Measurable Goal	Responsible Party	Progress on Goals Permit Year 7	Planned Activities Next Year
1.00	Public Education				
1.01	Storm water education program for school children	Purchase Enviroscope Watershed/Nonpoint Source model	DPW (1) - Amy Gill	Presentations using the Enviroscope were given to Amherst St. Elementary School as part of a Green Team Fair. About 12 presentations were given to 3rd through 5th grade students.	Continue presenting in the schools and at other events. Establish more contacts with educators.
Revision		Number of presentations given using Enviroscope			
1.02	Insert flyer in local newspaper describing city wide storm water program	Number of inserts distributed annually	DPW - Amy Gill	Newspaper article on City snow dump, including stormwater management program, on March 24, 2010.	Continue to seek newspaper coverage on stormwater issues.
1.03	Create web page on City web site	Web page online by 12/05	DPW - Stephen Dookran, Amy Gill	New City web site online. Draft for stormwater information being developed. Status of stormwater improvement projects listed.	Review and update stormwater web page.
Revision		Web page online by 12/08			
1.04	Create Public Service Announcements	Run Announcement quarterly on cable TV channel access	DPW - Amy Gill	Power point slides developed and played on local cable channel in October 2009.	Continue playing educational PowerPoint presentations on local and government cable access channels.
Revision		Number of days presentation runs			
1.05	Create brochure and presentation to inform businesses and industrial users about illicit discharges	Distribute to businesses and industrial users once every two years	DPW - Phil Appert	Visits to SIU and deficiencies discussed with property owners. Discussion of stormwater BMPs included in visits.	Continue visiting SIUs.
1.06	Run three videos on Cable Access TV. "After the Storm", "Stormwater is Never Away" and "A River Reborn"	Number of times videos are run.	DPW - Amy Gill	Public access channel restructured and new studio built.	Play videos on public access television.
1.07	Create board for display at functions where the public is gathered.	Number of times display is used.	DPW - Amy Gill	Board used as tool during Green Team Fair.	Update board and continue to display board at various public events.

1.08	Install Wetland Buffer Markers to encourage no dumping of debris in a wetland area.	75 markers to be installed in 3 years.	DPW - Roy Sorenson	Task complete. Wetland markers continue to be installed by developers as stipulations for approval by the Conservation Commission.	Installations of wetland markers will continue to be stipulated by the Conservation Commission as part of the approval process.
1.09	Mail letters to owners/residents that about wetland to explain importance of wetland and encourage no dumping in wetland area.	Number of letters mailed to abutters	DPW - Amy Gill, NCC(7)	Task completed.	
1.10	Design sign for brook/stream crossings	Percent design completed	DPW - Amy Gill, NCC	Discuss concept with City departments.	Design sign.
1.11	Present Stormwater Management Program at Public Meetings	Number of Presentations	DPW- Amy Gill	Monthly Stormwater Issue update given at monthly Board of Public Works meeting which is carried and replayed on Government access channel.	Continue monthly updates.
1.12	Purchase and distribute Magnets with "Paulie the Pickerel" logo at public functions	Number of magnets distributed	DPW - Amy Gill	Magnets continue to be distributed in city offices and at public demonstrations using the Enviroescape.	Continue to distribute magnets.
1.13	Develop informative flyer about stormwater pollution and include in wastewater bills and display at public places.	Number of flyers distributed	DPW- Mario Leclerc, Amy Gill	Inserts and doorhangers continue to be made available at public locations.	Continue to distribute information flyers.
1a.	Addition				
1.14	Develop Power point to run on Public Access television	Number of days presentation runs	DPW- Gill	Power point slides developed and played on local cable channel October 2009.	Update and run informational slides.
2.00	Public Participation				
2.01	Attach Storm Drain Markers in or near Catch Basins discharging to open water body	40% installed by 11/04, 80% installed by 11/05, 100% by 11/06	DPW - Amy Gill, Pennichuck Water Works, Inc.	Previously placed markers inspected to determine durability of marker.	Continue to have public involved in applying markers.
Revision		50% installed by 10/08			

2.02	Continue phone hotline service for stormwater related concerns	Establish a hotline. Record number of phone calls concerning drainage issues	DPW- Mario Leclerc, NWTf(2)	Hotline for drainage issues continues. Record violations and report to NHDES(3) and USEPA(4) as needed.	Continue hotline for drainage issues.
2.03	Meet with local communities, and the NHDOT(9). Meeting coordinated by the Nashua Regional Planning Commission (NRPC). Group called Nashua Stormwater Coalition.	Meet every two months for a total of 6 meetings per year	DPW - Amy Gill, NRPC (8), NHDES	NRPC can longer host meetings. NHDES initiated communications to resurrect coalition. Agendas discussed and meeting scheduled for April 27, 2010.	Continue to meet with members of the surrounding communities. NHDES to take lead in organizing the meeting. Nashua to host meeting for the next reporting period.
2.04	Create door hanger with tips on preventing stormwater pollution	Number of door hangers distributed	DPW - Amy Gill	Door hangers were distributed as a part of educational presentations and made available at public areas in City Hall.	Continue to distribute door hangers to the public.
2.05	Provide email links for stormwater related concerns	Number of times email received	DPW	Frequent emails received to report stormwater issues.	Continue to monitor emails.
2.06	Request public input for ordinance revision to Stormwater Management and Wetlands sections	Number of meetings held	CDD (5)	Continue to obtain public comment on ordinances.	Continue to obtain public comment on ordinances.
3.00	Illicit Discharge Detection and Elimination				
3.01	Map outfalls and waters of the United States in Nashua city limits	Complete by 11/04. Count number of outfalls identified	DPW - Amy Gill	Continued updating GIS maps based on field verifications of drainage systems and outfalls, and completion of new drainage systems.	Continue to update GIS maps based on field verification of outfalls and newly constructed outfalls.
3.02	Prepare an Illicit Discharge Detection and Elimination (IDDE) Plan	Complete final plan 10/04	DPW - Amy Gill	Continue to develop Draft IDDE.	Complete IDDE Plan.
Revision		Complete final plan 10/06			
3.03	Review illicit discharge ordinance	Amend ordinance as necessary by 12/07	DPW - Amy Gill	Determined if ordinance may require revisions.	Begin process to make changes to ordinance if needed.

3.04	Continue dry weather field survey of outfalls.	Complete survey of outfalls. Locate other outfalls in water bodies not included in survey by 11/04	DPW - Mario Leclerc, Amy Gill	Continue survey of outfalls on smaller brooks and ponds. Additional outfalls documented.	Update outfall list as outfalls are located or newly constructed.
3.05	Conduct sampling of dry weather discharges and attempt to trace source of illicit discharge	Sample and identify source of suspect outfalls	DPW - Amy Gill	Dry weather sampling of stream and brooks scheduled to attempt to trace illicit discharges.	Sample suspect sources as needed.
3.06	Remove illicit discharges as budgetary funding allows	Track number of illicit discharges detected and removed	DPW - Mario Leclerc, Roy Sorenson	Visual inspections of outfall continue in trying to identify suspect discharges.	Continue testing and tracking suspect discharges.
3.07	Continue Regional Hazardous Waste Collection Day	Conduct 5 collection days per year	DPW - Sally Hyland, NRPC	Hazardous waste collection days were held on 4/18, 5/2, 6/4, 8/1, 10/3, and 11/7/09. Event coordinated with NRPC. The total manifested volume brought by Nashua residents totaled approximately 25,879 pounds of material.	Hazardous waste collection days scheduled for 4/24, 5/ 8, 6/3, 8/7, 10/2 and 11/6/2010 for this year.
3.08	Track Hazardous Spills	Number of Spills identified	DPW - Mario Leclerc	Traffic accident resulted in vehicle fluids being discharged into a catch basin.	Report on spills as necessary.
3.09	Conduct watershed audit for input in NRPC report	Complete audit	DPW, CDD, NRPC	Audit completed.	
3.10	Sample outfalls in water body RIV700061201-05, identified on the Impaired waters list	Number of outfalls sampled	DPW - Mario Leclerc	Waterway continues to be visually inspected. No suspect sources noted.	Sample outfalls and trace source, if possible.
4.00	Construction Site Runoff Control				
4.01	Review procedure for site plan review to consider if potential water quality impacts are included	Complete review by Dec. 31 2005	CDD- Lucy St. John	Land use ordinance revised and updated, effective January 2, 2006.	Continue review of implementation of new ordinances.

4.02	Review requirements for construction operators to control demolition waste, chemicals, sanitary waste and other waste at the construction site	Complete review by Dec. 31 2005	CDD- Lucy St. John	Land use ordinance revised and updated, effective January 2, 2006.	Continue review of implementation of new ordinances.
4.03	Review existing city ordinances concerning stormwater management at construction sites (Sec 16-145) and modify as necessary	Make recommendations for improvements by June 2006. Proceed through internal process to change ordinance by Dec. 2007	CDD- Lucy St. John	Land use ordinance revised and updated, effective January 2, 2006.	Continue review of implementation of new ordinances.
4.04	Develop standard drawings of runoff prevention BMPs to be used by site developers	Produce document containing at least 7 alternative erosion protection measures by Dec. 2006	DPW - Amy Gill	Gather sample drawings and compile into standards.	Compile drawings electronically.
4.05	Review procedures for inspection of construction sites to see if BMPs are in place and functioning correctly	Complete review by Dec. 2006	CDD- Lucy St. John	CDD contacted and informed that procedures need to be reviewed.	Complete review of inspection procedures.
4.06	Review procedures for enforcement of improper functioning sediment and erosion control measures	Complete review by Dec. 2006	CDD- Lucy St. John	CDD contacted and informed that procedures need to be reviewed.	Complete review of inspection procedures.
5.00	Post Construction Runoff Control				
5.01	Review existing ordinance Sec. 16-145 which requires post development peak discharges be no greater than predevelopment discharges. Modify as necessary	Make recommendations for improvements by June 2006. Proceed through internal process to change ordinance by Dec. 2007	CDD- Lucy St. John	Land use ordinance revised and updated, effective January 2, 2006.	Continue review of implementation of new ordinances.

5.02	Review ordinance Sec 16-145 for ground water recharge required on new site plans	Make recommendations for improvements by June 2006. Proceed through internal process to change ordinance by Dec. 2007	CDD- Lucy St. John	Land use ordinance revised and updated, effective January 2, 2006. Staff continues to make recommendations on improving the quality of landscaping plans submitted.	Continue review of implementation of new ordinances.
5.03	Implement Annual Operations and Maintenance requirement for BMPs on private properties	Implement by Dec. 2007	CDD- Lucy St. John	Land use ordinance revised and updated, effective January 2, 2006.	Continue review of implementation of new ordinances.
5.04	Develop enforcement measures and assign internal staff to enforce requirements	Implement by Dec. 2007	CDD	Review of enforcement procedures ongoing.	Complete review of requirements.
5a.	Addition				
5.05	Install Low Impact Development items on Municipal Properties	Design and Construct on Riverside Street Property	DPW - Steve Dookran	Task complete.	
6.00	Municipal Good Housekeeping				
6.01	Hazardous waste training program for applicable employees	Employees attend annual hazardous spill training program beginning May 2005	DPW - Mario Leclerc	Consultant hired to train NWTF staff about hazardous wastes.	Continue to train employees.
6.02	Storm water discharge training program for applicable municipal employees on preventing non-storm water discharges	Employees attend annual storm water discharge training program beginning May 2005	DPW - Mario Leclerc	EPA Stormwater Web Casts viewed by staff. Employees attended various conferences.	Continue to train employees.
6.03	Review program for handling fertilizer on city property	Complete review July 2005	DPW - Nicholas Caggiano, Amy Gill	Task complete.	Continue implementation of fertilization policies.
6.04	Continue litter management program by street sweeping entire City at least once a year.	Review program annually and record number of lane miles swept	DPW - Roy Sorenson	Program began in March 2008. Entire City swept once, with commercial/arterial or other critical streets being swept up to 6 times per year.	Continue street sweeping.

6.05	Review snow dumping procedure to allow snow storage in areas away from surface waters	Complete review July 2005	DPW - Roy Sorenson	Program reviewed. Snow continues to be stored in areas where stormwater treatment is available before the melted snow is discharged to a water body. Area is swept during and after snow melt.	Review program annually.
6.06	Continue city wide program to clean catch basins	100% of all catch basins cleaned once every 3 years	DPW - Mario Leclerc	At least 375 catch basin were cleaned. An increase of 9%	Continue catch basin cleaning program.
6.07	Continue SSO(6) correction and mitigation program for SSOs that discharge to water bodies	Record number of SSOs corrected.	DPW - Mario Leclerc	No SSOs were reported that affected a water body were reported.	Continue correction of SSOs.
6.08	Television inspection of storm drains as needed	Record number Inspect as needed	DPW - Mario Leclerc	Approximately 3,850 LF of Storm Drain were inspected with the robotic camera.	Continue inspection as needed.
6.09	Calibrate salt and sand truck spreaders	Complete annually before November 1st	DPW - Roy Sorenson	Calibrated salt and sand trucks in November 2009.	Calibrate trucks in fall 2010.
6.10	Review pooper scooper ordinance	Review ordinance by July 2005	DPW- Amy Gill, Nick Caggiano	Ordinance reviewed and found adequate. Four Doggie Convenience Stations were monitored. Bags holders are being emptied and replaced approximately monthly. Stations frequently vandalized.	Monitor the use of the Doggie Convenience Stations.
6.11	Disseminate information contained within city developed Alternative Storm Water Management Methods guide for Storm Water Control	Make available to developers as guide by July 2004	DPW - Amy Gill	Low impact development ideas continued to be discussed with developers.	Continues discussion with developers the advantages of LIDs.
Revision		Make available by July 2005			
6.12	Develop a ditch/swale cleaning program	Develop program by July 2005	DPW - Mario Leclerc	Swales continue to be inspected and cleaned as needed. Preliminary inventory of swales identified in GIS of completed.	Hire interns to field locate and inventory swales. Document findings. Clean swales as necessary.

6.13	Develop culvert maintenance program.	Develop and Implement program by 2007	DPW - Mario Leclerc	Summer intern hired to locate, document, and inspect culverts. Summer laborers hired to address large number of work orders related to required culvert cleaning. GIS mapping updated.	Continue to locate culverts and clean culverts as needed. Update GIS system as necessary.
7.00 Impaired Waters					
No TMDL is yet required for any water body into which the City stormwater discharges. See Appendix A for list of Draft 2010 303(d) Impaired Waters that require a TMDL within the limits of the City of Nashua and the TMDL schedule.					

- (1) DPW - Division of Public Works, City of Nashua
- (2) NWTF - Nashua Wastewater Treatment Facility, City of Nashua
- (3) NHDES - New Hampshire Department of Environmental Services
- (4) USEPA - United States Environmental Protection Agency
- (5) CDD - Community Development Division, City of Nashua
- (6) SSO - Sanitary Sewer Overflow
- (7) NCC - Nashua Conservation Commission
- (8) NRPC - Nashua Regional Planning Commission
- (9) NHDOT - New Hampshire Department of Transportation