

Year 5 Annual Report
New Hampshire Small MS4 General Permit
Reporting Period: July 1, 2022-June 30, 2023

Please DO NOT attach any documents to this form. Instead, attach all requested documents to an email when submitting the form. Also ensure any websites included on this form are to publicly accessible sites

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, 2022 and June 30, 2023 unless otherwise requested.

Part I: Contact Information

Name of Municipality or Organization: Town of Hudson, NH

EPA NPDES Permit Number: NHR041013

Primary MS4 Program Manager Contact Information

Name: Elvis Dhima, PE.

Title: Town Engineer

Street Address Line 1: 12 School Street

Street Address Line 2: Engineering Department

City: Hudson

State: NH

Zip Code: 03051

Email: edhima@hudsonnh.gov

Phone Number: 603-886-6008

Stormwater Management Program (SWMP) Information

SWMP Location (publicly available web address): <http://www.hudsonnh.gov/bc-swc>

Date SWMP was Last Updated: Jun 29, 2023

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)

- ☒ Bacteria/Pathogens
 ☐ Chloride
 ☐ Nitrogen
 ☒ Phosphorus
☐ Solids/ Oil/ Grease (Hydrocarbons)/ Metals

TMDL(s)

- ☒ Bacteria and Pathogen
 ☐ Chloride
 ☒ 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.

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 publicly available 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:

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)

Structural BMPs

- Completed the evaluation of all permittee owned properties identified as presenting retrofit opportunities or areas for structural BMP installation under permit part 2.3.6.d or identified in the
- ☒ Phosphorus Source Identification Report, including: *(select the items of the evaluation that have been completed below)*
- ☒ Next planned infrastructure, resurfacing, or redevelopment activity planned for the property (if applicable) OR planned retrofit date
 - ☒ Estimated cost of redevelopment or retrofit BMPs
 - ☒ Engineering and regulatory feasibility of redevelopment or retrofit BMPs
- ☒ Completed a listing of planned structural BMPs and a plan and schedule for implementation
- ☐ The BMP list and implementation schedule is attached to the email submission
 - ☒ The BMP list and implementation schedule can be found at the following publicly available website:

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

- 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.
- ☒ ☐ No BMPs were installed
- ☐ The BMP information is attached to the email submission
- ☒ The BMP information can be found at the following website:

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

Total estimated phosphorus removed in **lbs/year** from the installed BMPs:

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:

Lake and Pond Phosphorus TMDL

- ☒ Completed the written Phase 1 Lake Phosphorus Control Plan (LPCP), including: *(select the items in the Phase 1 LPCP that have been completed)*
- ☒ Planned nonstructural controls
 - ☒ O&M program for structural controls
 - ☒ Implementation schedule
 - ☒ Cost of implementation

The Phase 1 LPCP: *(select one of the following options)*

- ☐ is attached to the email submission

- can be found at the following publicly available website:

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

Baseline phosphorus export reduction required from LPCP Area (**lbs/** **year**): 95.2

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:

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

A new bioretention basin was installed at the new police station that is estimated to provide a TP load reduction of approximately 3.0 lbs/yr.

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:** 0

*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 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 /DPW Operations

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 2023

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

Measurable Goal(s):

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

Message Date(s): June 2023

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: Residents

Responsible Department/Parties: Engineering/Conservation Committee

Measurable Goal(s):

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

Message Date(s): Sept 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: 1-4 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 Operations

Measurable Goal(s):

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

Message Date(s): Sept 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:

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. Also, related materials were displayed during Old Home Days in August

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 Cons Comm held at least one public meeting/hearing 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: 0

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 publicly available website:

No outfall inspections during this reporting period, but previous dry weather screening was completed in 2019 and the data can be found on the town stormwater website. Additional catchment investigations have been initiated in Year 6

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

Number of outfalls screened: 0

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

Percent of outfalls screened: 100

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

see narrative above

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 publicly available website:

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

Number of catchment investigations completed this reporting period: 0

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

Percent of total catchments investigated: 0

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

Catchment investigations have been initiated in Year 6

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 publicly available 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:**

Annual IDDE and Good Housekeeping training was provided to DPW personnel in March 2023

MCM4: Construction Site Stormwater Runoff Control

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

Number of site plan reviews completed: 11

Number of inspections completed: 551

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): April 2020

Website of ordinance or regulatory mechanism: <https://www.hudsonnh.gov/planning/page/subdivision-site-plan-regulations>

As-built Drawings

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

Number of as-built drawings received: 7

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

Street Design and Parking Lots Report

Below, describe any changes made or planned to be made to local regulations and guidelines based on the report completed in Year 4:

An assessment of the Town's street and parking design requirements was completed in Year 4 and although the current requirements were generally found to be consistent with the MS4 requirements and those in other communities, the Town updated their design requirements in May 2022.

Green Infrastructure Report

Below, describe progress towards making green infrastructure practices allowable based on the report completed in Year 4:

An assessment of the Town's regulations to allow and/or encourage the use of green infrastructure in site design in Year 4. The regulations generally allow and encourage the use of LID and green infrastructure both in the regulations and design guidelines. No regulation changes were proposed as a result of the assessment.

Retrofit Properties Inventory

Below, list remaining permittee-owned properties that could be modified or retrofitted with BMPs to mitigate impervious areas (must maintain a minimum of 5 sites in inventory until less than 5 sites remain):

Robinson Pond Beach Parking Area
Robinson Pond Boat Launch Area
Bensen Park
Hazelwood Avenue
Parker Dr. / Kienna Rd

Below, list all properties that have been modified or retrofitted with BMPs to mitigate impervious area that were inventoried as part of 2.3.6.e of the permit. Non-MS4 owned properties that have been modified or retrofitted with BMPs to mitigate impervious area may also be listed, but must be indicated as non-MS4.

In MS4 Area

the newly renovated Police Station completed in 2023 added a new bioretention stormwater BMP as noted earlier in this annual report

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: 312

Number of catch basins cleaned: 312

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: ~ 280

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

☒ Volume of material removed: 850 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:

none needed

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. If any of the above year 5 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 6 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 6 below:

The Town has hired a consultant team to conduct additional water quality and sediment sampling in Robinson Pond beginning in July 2023 to better assess the extent of potential internal phosphorus loading and perform a preliminary engineering feasibility analysis to assess the potential stormwater BMPs at the Town beach and boat launch parking lot areas with an expected study completion date of June 2024.

Part V: Certification of Small MS4 Annual Report 2023**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. Malizia

Title:

Town Administrator

Signature:



Date:

9/12/23

*[Signatory may be a duly authorized
representative]*

