

## Notice of Intent (NOI) for Coverage under Small MS4 General Permit

### Part One: General Conditions

#### **General Information**

Name of Municipality or Organization: Town of Bedford

State: New Hampshire

EPA NPDES Permit Number (if applicable): NHR041036

#### **Primary MS4 Program Manager Contact Information**

[

Name: Jeffrey Foote, P.E.

Title: Director of Public Works

Street Address Line 1: 55 Constitution Drive

City: Bedford

State: NH

Zip Code: 03110

Email: jfoote@bedfordnh.org

Phone Number: (603) 472-3070

Fax Number: N/A

#### **Other Information**

**Eligibility Determination** – See Part IV- Notes and Comments (1) and (2)

Endangered Species Act (ESA) Determination Complete?: Yes

Eligibility Criteria (check all that apply):

A  B  C

National Historic Preservation Act (NHPA) Determination Complete?: Yes

Eligibility Criteria (check all that apply):

A  B  C  D

Check the box if your municipality or organization was covered under the 2003 MS4 General Permit YES

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**MS4 Infrastructure** (if covered under the 2003 permit)

**Estimated Percent of Outfall Map Complete?**

*(Part II, III, IV or V, Subpart B.3.(a) of 2003 permit?)*

If 100% of 2003 requirements not met, enter an estimated date of completion

(MM/DD/YY):

Web address where MS4 map is published:

*If outfall map is unavailable on the internet an electronic or paper copy if the outfall map must be included with NOI submission (see section V for submission options)*

**Regulatory Authorities** (if covered under the 2003 permit)

**Illicit Discharge Detection and Elimination (IDDE) Authority Adopted?**

*(Part II, III, IV, or V, Subpart B.3.(b) of 2003 permit)*

Effective Date or Estimated Date of Adoption (MM/DD/YY):

**Construction/Erosion and Sediment Control (ESC) Authority Adopted?**

*(Part II, III, IV, or V, Subpart B.4.(a) of 2003 permit)*

Effective Date or Estimated Date of Adoption (MM/DD/YY):

**Post-Construction Stormwater Management Adopted?**

*(Part II, III, IV, or V, Subpart B.5.(a) of 2003 permit)*

Effective Date or Estimated Date of Adoption (MM/DD/YY):

– See Part IV- Notes and Comments (3)



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### Part III: Stormwater Management Program Summary

Identify the Best Management Practices (BMPs) that will be employed to address each of the six Minimum Control Measures (MCMs).

For each MCM, list each existing or proposed BMP by category and provide a brief description, responsible parties/departments, measurable goals, and the year the BMP will be employed (public education and outreach BMPs also requires a target audience.) **Use the drop-down menus in each table or enter your own text to override the drop down menu.**

#### MCM 1: Public Education and Outreach

| BMP Media/Category                       | BMP Description  | Targeted Audience                                  | Responsible Department/Parties  | Measurable Goal  | Beginning Year of BMP Implementation |
|--|--|--|---|--|--------------------------------------|
| Web Page and other promotional materials | Use NH Stormwater Coalition outreach materials and guidance -implementing outreach for relevant impairments city wide. | Residents  | NH Regional Stormwater Coalition<br><br>See:<br><a href="https://www4.des.state.nh.us/nh-ms4/?page_id=54">https://www4.des.state.nh.us/nh-ms4/?page_id=54</a> | 1) Increased awareness of how fertilizer works.<br>2) Increased awareness of pet waste impacts to water quality.<br>3) Increased awareness of yard waste impacts to water quality. | Yearly                               |
| Promotional Material                     | Use NH Stormwater Coalition outreach materials and guidance -implementing outreach for relevant impairments city wide. | Businesses, Institutions and Commercial Facilities | NH Regional Stormwater Coalition<br><br>See:<br><a href="https://www4.des.state.nh.us/nh-ms4/?page_id=54">https://www4.des.state.nh.us/nh-ms4/?page_id=54</a> | 1) Increased awareness of how fertilizer works.<br>2) Increased awareness of pet waste impacts to water quality.<br>3) Increased awareness of yard waste impacts to water quality. | 2019                                 |
| Promotional Materials                    | Use NH Stormwater Coalition outreach materials and guidance for developers audience.                                   | Developers (construction)                          | NH Regional Stormwater Coalition<br><br>See:<br><a href="https://www4.des.state.nh.us/nh-ms4/?page_id=54">https://www4.des.state.nh.us/nh-ms4/?page_id=54</a> | Local developers aware of federal SW regulations   | 2019                                 |
| Promotional Materials                    | Use NH Stormwater Coalition outreach materials and guidance for industrial facilities.                                 | Industrial Facilities                              | NH Regional Stormwater Coalition<br><br>See:<br><a href="https://www4.des.state.nh.us/nh-ms4/?page_id=54">https://www4.des.state.nh.us/nh-ms4/?page_id=54</a> | Increased awareness of Industrial Facilities permit  | 2020                                 |

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| BMP Media/ Category   | BMP Description  | Targeted Audience                                  | Responsible Department/Parties  | Measurable Goal  | Beginning Year of BMP Implementation |
|-----------------------|--|--|---|--|--------------------------------------|
| Promotional Materials | Use NH Stormwater Coalition outreach materials and guidance for developers audience.   | Developers (construction)                          | NH Regional Stormwater Coalition<br><br>See:<br><a href="https://www4.des.state.nh.us/nh-ms4/?page_id=54">https://www4.des.state.nh.us/nh-ms4/?page_id=54</a> | Local developers aware of local SW regulations                               | 2022                                 |
|                       | NA- see previous page. Doing every year starting in 2019.                              | Businesses, Institutions and Commercial Facilities | NH Regional Stormwater Coalition<br><br>See:<br><a href="https://www4.des.state.nh.us/nh-ms4/?page_id=54">https://www4.des.state.nh.us/nh-ms4/?page_id=54</a> |  |                                      |
|                       | NA- see previous page. Doing every year starting in 2019.                              | Developers (construction)                          | NH Regional Stormwater Coalition<br><br>See:<br><a href="https://www4.des.state.nh.us/nh-ms4/?page_id=54">https://www4.des.state.nh.us/nh-ms4/?page_id=54</a> |  |                                      |
| Promotional Materials | Use NH Stormwater Coalition outreach materials and guidance for industrial facilities. | Industrial Facilities                              | NH Regional Stormwater Coalition<br><br>See:<br><a href="https://www4.des.state.nh.us/nh-ms4/?page_id=54">https://www4.des.state.nh.us/nh-ms4/?page_id=54</a> | Make local industries aware of SW regulations and Best Management Practices. | 2023                                 |

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### Part III: Stormwater Management Program Summary (continued)

#### MCM 2: Public Involvement and Participation

| <b>BMP Categorization</b> | <b>Brief BMP Description</b>   | <b>Responsible Department/Parties</b> | <b>Additional Description/ Measurable Goal</b>   | <b>Beginning Year of BMP Implementation</b> |
|---------------------------|--|---------------------------------------|--|---|
| Public Review             | SWMP Review: SWMP will be posted on the town website for public review. The SWMP will be reviewed annually and updated/revised as necessary.             | Department of Public Works            | Allow annual review of stormwater management plan and posting of stormwater management plan on website | 2020  |
| Public Participation      | The SWMP will be presented or communicated by a "memo" annually to the public with opportunity for comment. Meeting minutes will record public comments. | Department of Public Works            | Allow public to comment on stormwater management plan annually   | 2020  |

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### Part III: Stormwater Management Program Summary (continued)

#### MCM 3: Illicit Discharge Detection and Elimination (IDDE)

| <b>BMP Categorization</b>               | <b>BMP Description</b>  | <b>Responsible Department/Parties</b> | <b>Measurable Goal</b>   |
|---|---|---------------------------------------|--|
| Sanitary Sewer Overflow (SSO) inventory | Develop SSO inventory in accordance of permit conditions                      | Department of Public Works            | Complete within 1 year of effective date of permit   |
| Storm sewer system map                  | Create map and update during IDDE program completion                          | Department of Public Works            | Update map within 2 years of effective date of permit and complete full system map 10 years after effective date of permit |
| Written IDDE program development        | Create written IDDE program   | Department of Public Works            | Complete within 1 year of the effective date of permit and update as required  |
| Implement IDDE program                  | Implement catchment investigations according to program and permit conditions | Department of Public Works            | Complete 10 years after effective date of permit   |
| Employee training                       | Train employees in IDDE implementation  | Department of Public Works            | Train annually   |
| Conduct dry weather screening           | Conduct in accordance with outfall screening procedure and permit conditions  | Department of Public Works            | Complete 3 years after effective date of permit  |
| Conduct wet weather screening           | Conduct in accordance with outfall screening procedure                        | Department of Public Works            | Complete 10 years after effective date of permit   |
| Ongoing screening                       | Conduct dry weather and wet weather screening (as necessary)                  | Department of Public Works            | Complete ongoing outfall screening on completion of IDDE program   |

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### Part III: Stormwater Management Program Summary (continued)

#### MCM 4: Construction Site Stormwater Runoff Control

| <b>BMP Categorization</b>  | <b>BMP Description</b>  | <b>Responsible Department/Parties</b>                                      | <b>Measurable Goal</b>                                 |
|--|---|--|--|
| Site inspection and enforcement of Erosion and Sediment Control (ESC) measures | Complete written procedures of site inspections and enforcement procedures  | Planning Department/<br>Building Department                                | Complete within 1 year of the effective date of permit |
| Site Plan Review   | Complete written procedures of site plan review and begin implementation  | Planning Department  | Complete within 1 year of the effective date of permit |
| Erosion and sediment Control   | Adoption of requirements for construction operators to implement a sediment and erosion control program   | Planning Department/<br>Building Department                                | Complete within 1 year of the effective date of permit |
| Waste Control  | Adoption of requirements to control wastes, including but not limited to, discarded building materials, concrete truck wash out, chemicals, litter, and sanitary wastes | Planning Department/<br>Department of Public Works/<br>Building Department | Complete within 1 year of the effective date of permit |



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### Part III: Stormwater Management Program Summary (continued)

#### MCM 5: Post-Construction Stormwater Management in New Development and Redevelopment

| BMP Categorization  | BMP Description   | Responsible Department/Parties                     | Measurable Goal   |
|---|---|--|---|
| As-built plans for on-site stormwater control   | The procedures to require submission of as-built drawings and ensure long term operation and maintenance will be a part of the SWMP   | Planning Department/<br>Department of Public Works | Require submission of as-built plans for completed projects                                   |
| Target properties to reduce impervious areas  | Complete an inventory and priority ranking of permittee-owned property and existing infrastructure that could be retrofitted with BMPs designed to reduce the frequency, volume and pollutant loads of stormwater discharges to its MS4 through the mitigation of impervious area | Department of Public Works                         | Complete 4 years after effective date of permit and report annually on retrofitted properties |
| Allow green infrastructure  | Develop a report assessing existing local regulations to determine the feasibility of making green infrastructure practices allowable when appropriate site conditions exist  | Planning Department                                | Complete 4 years after effective date of permit and implement recommendations of report       |
| Street design and parking lot guidelines  | Develop a report assessing requirements that affect the creation of impervious cover. The assessment will help determine if changes to design standards for streets and parking lots can be modified to support low impact design options.  | Planning Department                                | Complete 4 years after effective date of permit and implement recommendations of report       |
| Ensure any stormwater controls or management practices for new development and redevelopment meet the retention or treatment requirements of the permit and consistent with the Southeast Watershed Alliance's Model Stormwater Standards for Coastal Watershed Communities | Adoption, amendment, or modification of a regulatory mechanism to meet permit requirements  | Planning Department/<br>Department of Public Works | Complete 2 years after effective date of permit   |

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### Part III: Stormwater Management Program Summary (continued)

#### MCM 6: Municipal Good Housekeeping and Pollution Prevention

| <b>BMP Categorization</b>   | <b>BMP Description</b>  | <b>Responsible Department/Parties</b> | <b>Measurable Goal</b>   | <b>Beginning Year of BMP Implementation</b> |
|---|---|---------------------------------------|--|---|
| O&M procedures  | Create written O&M procedures including all requirements contained in 2.3.7.1 for parks and open spaces, buildings and facilities, and vehicles and equipment | Department of Public Works            | Complete and implement 2 years after effective date of permit          | 2020  |
| Inventory all permittee-owned parks and open spaces, buildings and facilities, and vehicles and equipment | Create inventory  | Department of Public Works            | Complete 2 years after effective date of permit and implement annually | 2020  |
| Infrastructure O&M  | Establish and implement program for repair and rehabilitation of MS4 infrastructure   | Department of Public Works            | Complete 2 years after effective date of permit                        | 2020  |
| Stormwater Pollution Prevention Plan (SWPPP)  | Create SWPPPs for maintenance garages, transfer stations, and other waste-handling facilities   | Department of Public Works            | Complete 2 years after effective date of permit                        | 2020  |

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| <b>BMP Categorization</b>                                      | <b>BMP Description</b>  | <b>Responsible Department/Parties</b> | <b>Measurable Goal</b>   | <b>Beginning Year of BMP Implementation</b> |
|--|---|---------------------------------------|--|---|
| Catch basin cleaning   | Establish schedule for catch basin cleaning such that each catch basin is no more than 50% full and clean catch basins on that schedule | Department of Public Works            | Clean catch basins on established schedule and report number of catch basins cleaned and volume of material moved annually | 2019  |
| Street sweeping program  | Sweep all streets and permittee-owned parking lots in accordance with permit conditions   | Department of Public Works            | Sweep all streets and permittee-owned parking lots once per year in the spring   | 2019  |
| Road salt use optimization program                             | Establish and implement a program to minimize the use of road salt  | Department of Public Works            | Implement salt use optimization during deicing season  | 2020  |
| Inspections and maintenance of stormwater treatment structures | Establish and implement inspection and maintenance procedures and frequencies   | Department of Public Works            | Inspect and maintain treatment structures at least annually  | 2020  |

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### Part III: Stormwater Management Program Summary (continued)

#### Actions for Meeting Total Maximum Daily Load (TMDL) Requirements

Choose the relevant TMDL conditions, action description to meet the TMDL requirements, and the responsible department/parties from the menu below. If no options are applicable, or more than one, **enter your own text to override drop-down menus**. If submitting a NHDES approved alternative reduction plan, attach and submit it with the NOI.

| <b>Applicable TMDL</b>                    | <b>Action Description</b>                             | <b>Responsible Department/Parties</b>                   |
|---|---|---|
| 58 Bacteria Impaired Waters<br>(Bacteria) | Adhere to requirements in Part II.1<br>of Appendix F  | DPW Operations<br>Engineering<br>Environment Department |
| New Hampshire Statewide<br>(Bacteria)     | Adhere to requirements in Part II.1<br>of Appendix F  | DPW Operations<br>Engineering<br>Environment Department |
| Sebbins Pond (Phosphorus)                 | Adhere to requirements in Part III.1<br>of Appendix F | DPW Operations<br>Engineering<br>Environment Department |



**Notice of Intent (NOI) for Coverage under Small MS4 General Permit**Part IV: Notes and additional information

Use the space below to indicate the part(s) of 2.2.2 that you have identified as not possible to your MS4 and provide all supporting documentation below or attach additional documents if necessary.

Provide any additional information about your MS4 program below.

(1) Part I – Under Eligibility Determination Endangered Species (ESA) Act: Bedford acknowledges that it agrees that there will be no effect on the listed species and that any proposed future projects will require compliance with the ESA Determination.

(2) Part I – Under Eligibility Determination National Historic Preservation Act (NHPA) Determination: Bedford acknowledges that there are no construction impacts planned under the NOI and that any proposed future projects will require compliance with the NHPA Determination.


(3) Part I – Under Regulatory Authorities, Post Construction Stormwater Management: It was determined under the 2003 permit that the current regulations met the criteria. However, it is Bedford's intent to revisit this topic and propose any necessary revisions for the 2019 Town Meeting to be held on March 19, 2019.

(4) Part III – Under Actions for Meeting Requirements Related to Water Quality Limited Waters, there are additional pollutants on Bedford's 303(d) list (specifically Aluminum - Patten Brook and Benthic-Macroinvertebrate Bioassessments – Baboosic Brook). They have been omitted from the table, as there are no applicable Action Descriptions in Appendix H.

**Notice of Intent (NOI) for Coverage under Small MS4 General Permit**Part V: 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 gathered and evaluated 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 have no personal knowledge that the information submitted is other than 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: Richard Sawyer Title: Town Manager

Signature:  Date: 9/27/2018

*[To be signed according to Appendix B, Subparagraph B.11, Standard Conditions]*

Note: When prompted during signing, save the document under a new file name.

**NOI Submission**

Please submit the form electronically via email using the “Submit by Email” button below or send in a CD with your completed NOI. You may also print and submit via mail using the address below if you choose not to submit electronically. The outfall map required in Part 1 of the NOI (if applicable) can be submitted electronically as an email attachment OR as a paper copy.

***Permittees that choose to submit their NOI electronically by email or by mailing a CD with the completed NOI form to EPA, will be able to download a partially filled Year 1 Annual Report at a later date from EPA.***

Submit by email via this email address: [stormwater.reports@epa.gov](mailto:stormwater.reports@epa.gov)

Save this NOI document for your records.

**EPA Submittal Address:**

United States Environmental Protection Agency

5 Post Office Square – Suite 100

Mail Code – OEP06-1

Boston, Massachusetts 02109-3912

ATTN: Thelma Murphy