

MCM 6
Good Housekeeping and Pollution
Prevention for Permittee Owned Operations
Permit Part 2.3.7

PERMITTEE OWNED FACILITIES

BMP 6.1: Parks and Open Spaces Operations and Maintenance Procedures

Written Document Completed (by year 2)

Document Name and/or Web Address:

Responsible Department/Parties:

Description: Establish procedures to address the proper use, storage, and disposal of pesticides, herbicides, and fertilizers (PHF) including minimizing the use of these products in accordance with Section 2.3.7.1.a of the MS4 permit.

Measurable Goal(s): Implement the SOP on 100% of the parks and open spaces.

BMP 6.2: Buildings and Facilities Operations and Maintenance Procedures

Written Document Completed (by year 2)

Document Name and/or Web Address:

Responsible Department/Parties:

Description: Evaluate the use, storage, and disposal of petroleum products and other potential stormwater pollutants. Provide employee training as necessary, ensure that Spill Prevention Plans are in place. Develop management procedures for dumpsters and other waste management equipment. Sweep lots and areas surrounding the facilities clean to reduce runoff of pollutants in accordance with Section 2.3.7.1 b. of the MS4 permit.

Measurable Goal(s): Implement the SOP on 100% of buildings and facilities.

BMP 6.3: Vehicles and Equipment Operations and Maintenance Procedures

Written Document Completed (by year 2)

Document Name and/or Web Address:

Responsible Department/Parties:

Description: Establish procedures for the storage and cleaning of permittee vehicles. Vehicles with fluid leaks shall be stored indoors or containment shall be provided. Evaluate fueling areas owned by the permittee or used by Permittee vehicles. Establish procedures to ensure that vehicle wash waters are not discharged to municipal storm drains or surface waters.

Measurable Goal(s): Implement the SOP on 100% of municipal vehicles and equipment.

INFRASTRUCTURE

BMP 6.4: Catch Basin Cleaning Program

Written Document Completed (by year 1)

Document Name and/or Web Address:

Responsible Department/Parties:

Description:

The Bedford Public Works Department performs routine inspections, cleaning, and maintenance of the approximately ##NUMBER OF CATCH BASINS catch basins that are located within the MS4 regulated area. The Town of Bedford will implement the following catch basin inspection and cleaning procedures to reduce the discharge of pollutants from the MS4.

- Routine inspection and cleaning of catch basins. Catch basins should be cleaned such that they are not more than 50 percent full at any time. The Town of Bedford will initially inspect all catch basins within the regulated area within two (2) years of the effective date of the permit to evaluate sediment or debris accumulation and establish optimal inspection and maintenance frequencies to meet the “50 percent” goal.
- If a catch basin sump is more than 50 percent full during two consecutive routine inspections or cleaning events, the finding will be documented, the contributing drainage area will be investigated for sources of excessive sediment loading, and to the extent practicable, contributing sources will be addressed. If no contributing sources are found, the inspection and cleaning frequency will be increased.
- Catch basins located near construction activities (roadway construction, residential, commercial, or industrial development or redevelopment) will be inspected and cleaned more frequently if inspection and maintenance activities indicate excessive sediment or debris loadings (i.e., catch basins more than 50 percent full). Priority will also be given to catch basins that discharge to impaired waters.
- The following information will be included in each annual report:
 - Any action taken in response to excessive sediment or debris loadings;
 - Total number of catch basins;
 - Number of catch basins inspected;
 - Number of catch basins cleaned;
 - Total volume or mass of material removed from catch basins.

Measurable Goal(s):

All catch basins are cleaned in accordance with the document above such that no catch basin is more than 50% full at any given time.

BMP 6.5: Street Sweeping Program

Written Document Completed (by year 1)

Document Name and/or Web Address:

Responsible Department/Parties:

Description: The Town of Bedford will implement the following street and parking lot sweeping procedures to reduce the discharge of pollutants from the MS4:

- All streets with the exception of rural uncurbed roads with no catch basins or high-speed limited access highways will be swept and/or cleaned a minimum of once per year in the spring (following winter activities such as sanding).
- More frequent sweeping will be considered for targeted areas based on pollutant load reduction potential, inspections, pollutant loads, catch basin cleaning or inspection results, land use, impaired waters, or other factors.
- More frequent sweeping is required for municipally-owned streets and parking lots in areas that discharge to certain nutrient-impaired waters. Sweeping must be performed in these areas a minimum of two times per year, once in the spring (following winter activities such as sanding) and at least once in the fall (Sept 1 – Dec 1; following leaf fall)
- For rural uncurbed roadways with no catch basins and limited access highways, the Town of Bedford will either meet the minimum frequencies above, or develop and implement an inspection, documentation, and targeted sweeping plan outlining reduced frequencies within two (2) year of the effective date of the permit and submit such plan with its year one annual report.
- The following information will be included in each annual report:
 - Number of miles cleaned, or the volume or mass of material removed

Measurable Goal(s): Annually sweep 100% of all streets and municipal parking lots in accordance with the schedule listed above.

BMP 6.6: Winter Road Maintenance Program

Written Document Completed (by year 1)

Document Name and/or Web Address:

Responsible Department/Parties:

Description: The Town of Bedford will implement the following winter maintenance procedures to reduce the discharge of pollutants from the MS4:

- Minimize the use of and optimize the application of sodium chloride and other salt (while maintaining public safety) and consider opportunities for use of alternative materials.
- Optimize sand and/or chemical application rates through the use, where practicable, of automated application equipment (e.g., zero velocity spreaders),

anti-icing and pre-wetting techniques, implementation of pavement management systems, and alternate chemicals. Maintain records of the application of sand, anti-icing and/or de-icing chemicals to document the reduction of chemicals to meet established goals.

- Prevent exposure of deicing product (salt, sand, or alternative products) storage piles to precipitation by enclosing or covering the storage piles. Implement good housekeeping, diversions, containment or other measures to minimize exposure resulting from adding to or removing materials from the pile. Store piles in such a manner as not to impact surface water resources, groundwater resources, recharge areas, and wells
- Provide training for municipal employees on winter roadway maintenance procedures.

Measurable Goal(s): Evaluate at least one salt/chloride alternative for use in the municipality. Monitor salt usage by the Town of Bedford.

BMP 6.7: Stormwater Treatment Structures Inspection and Maintenance Procedures

Written Document Completed (by year 2)

Document Name and/or Web Address:

Responsible Department/Parties:

Description: Structural stormwater BMPs will be inspected annually at a minimum and maintained as needed.

Measurable Goal(s): Inspect and Maintain 100% of treatment structures to ensure proper function.

BMP 6.8: SWPPP

Written Document Completed (by year 2)

Document Name and/or Web Address:

Responsible Department/Parties:

Description: Develop and implement a SWPPP for all municipally owned or operated facilities in accordance with Section 2.3.7.2 of the MS4 permit.

Measurable Goal(s): Develop and implement SWPPP's for 100% of municipally owned facilities.

BMP 6.9: Training of Town Staff

Written Document Completed (by year 2)

Document Name and/or Web Address:

Responsible Department/Parties:

Description: Annually provide education and training to Town staff on required/recommended good

housekeeping procedures for municipal facilities.

Measurable Goal(s): Conduct annual training.

Annual Evaluation

Year 1 Annual Report

Document Name and/or Web Address:

Year 2 Annual Report

Document Name and/or Web Address:

Year 3 Annual Report

Document Name and/or Web Address:

Year 4 Annual Report

Document Name and/or Web Address: TBD

Year 5 Annual Report

Document Name and/or Web Address: TBD

Year X Annual Report

Document Name and/or Web Address: TBD

TMDLs and Water Quality Limited Waters

Bacteria/Pathogens

Combination of Impaired Waters Requirements and TMDL Requirements as Applicable

<p>Applicable Receiving Waterbody(ies) as listed in Appendix F of the MS4 permit and provided in the most recent approved list of impaired waterbodies.</p>	<p>TMDL/Impairment Name (if applicable)</p>
Patten Brook	Escherichia coli (Bacteria)
McQuade Brook	Escherichia coli (Bacteria)
Riddle Brook	Escherichia coli (Bacteria)

Annual Requirements Beginning Year 1

- Rank outfalls to these receiving waters as high priority for IDDE implementation in the initial outfall ranking (see IDDE Plan for ranking).
- Annual message encouraging the proper management of pet waste, including noting any existing ordinances where appropriate as outlined in this SWMP.

Phosphorus Impairment*

(* see Lake and Pond Phosphorus TMDL)

Applicable Receiving Waterbody(ies)	TMDL/Impairment Name (if applicable)

Annual Requirements Beginning Year 1

- Rank outfalls to these receiving waters as high priority for IDDE implementation in the initial outfall ranking (see IDDE Plan for ranking).
- Distribute an annual message that encourages the proper use and disposal of grass clippings and encourages the proper use of slow-release and phosphorus-free fertilizers as outlined in this SWMP.
- Distribute an annual message encouraging the proper management of pet waste, including noting any existing ordinances where appropriate as outlined in this SWMP.
- Distribute an annual message in the encouraging the proper disposal of leaf litter as outlined in this SWMP.
- Increase 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) as outlined in this plan.
- Establish procedures to properly manage grass cuttings and leaf litter on permittee property, including prohibiting blowing organic waste materials onto adjacent impervious surfaces.
- Retrofit inventory and priority ranking under 2.3.6.1.b. shall include consideration of BMPs to reduce phosphorus discharges.
- Any structural BMPs listed in Table 3 of Attachment 1 to Appendix H already existing or installed in the regulated area by the permittee or its agents shall be tracked and the permittee shall estimate the phosphorus removal by the BMP consistent with Attachment 1 to Appendix H. Document the BMP type, total area treated by the BMP, the design storage volume of the BMP and the estimated phosphorus removed in pass per year by the BMP in each annual report.

Requirements Due by Year 2

- The requirement for adoption/amendment of the permittee's ordinance or other regulatory mechanism shall include a requirement that new development and redevelopment stormwater management BMPs be optimized for phosphorus removal.

Requirements Due by Year 4

- Complete a Phosphorus Source Identification Report.
- The document name (if attached) and/or web address is/are: TBD
- Retrofit inventory and priority ranking under 2.3.6.1.b. shall include consideration of BMPs that infiltrate stormwater where feasible.

Requirements Due by Year 5

- Evaluate all permittee-owned properties identified as presenting retrofit opportunities or areas for structural BMP installation under Permit part 2.3.6.d.ii or identified in the Phosphorus Source Identification Report that are within the drainage area of the impaired water or its tributaries.
- Complete a listing of planned structural BMPs and a plan and schedule for implementation.

Nitrogen Impairment

Applicable Receiving Waterbody(ies)	TMDL/Impairment Name (if applicable)
None	

Annual Requirements Beginning Year 1

- Rank outfalls to these receiving waters as high priority for IDDE implementation in the initial outfall ranking (See IDDE Plan for ranking).
- Distribute an annual message that encourages the proper use and disposal of grass clippings and encourages the proper use of slow-release fertilizers as outlined in this SWMP.
- Distribute an annual message encouraging the proper management of pet waste, including noting any existing ordinances where appropriate as outlined in this SWMP.
- Distribute an annual message encouraging the proper disposal of leaf litter as outlined in this SWMP.
- Establish requirements for the use of slow release fertilizers on permittee owned property currently using fertilizer, in addition to reducing and managing fertilizer use as provided in part 2.3.7.1.
- Establish procedures to properly manage grass cuttings and leaf litter on permittee property, including prohibiting blowing organic waste materials onto adjacent impervious surfaces.
- Increase 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) as included in this SWMP.
- Any structural BMPs listed in Table 3 of Attachment 1 to Appendix H already existing or installed in the regulated area by the permittee or its agents shall be tracked and the permittee shall estimate the nitrogen removal by the BMP consistent with Attachment 1 to Appendix H.

Requirements Due by Year 2

- The requirement for adoption/amendment of the permittee's ordinance or other regulatory mechanism shall include a requirement that new development and redevelopment stormwater management BMPs be optimized for nitrogen removal.

Requirements Due by Year 4

- Complete a Nitrogen Source Identification Report.
- The document name (if attached) and/or web address is/are: TBD
- Retrofit inventory and priority ranking under 2.3.6.1.b. shall include consideration of BMPs to reduce nitrogen discharges.

Requirements Due by Year 5

- Evaluate all permittee-owned properties identified as presenting retrofit opportunities or areas for structural BMP installation under Permit part 2.3.6.d.ii or identified in the Nitrogen Source Identification Report that are within the drainage area of the impaired water or its tributaries.
- Complete a listing of planned structural BMPs and a plan and schedule for implementation.

Solids, Oil and Grease (Hydrocarbons), or Metals Impairments

Applicable Receiving Waterbody(ies)	TMDL/Impairment Name (if applicable)
None	

Annual Requirements Beginning Year 1

- Rank outfalls to these receiving waters as high priority for IDDE implementation in the initial outfall ranking (See IDDE Plan for ranking).
- Increase street sweeping frequency of all municipal owned streets and parking lots to a schedule to target areas with potential for high pollutant loads as prescribed by this SWMP.
- Prioritize inspection and maintenance for catch basins to ensure that no sump shall be more than 50 percent full; Clean catch basins more frequently if inspection and maintenance activities indicate excessive sediment or debris loadings as prescribed by this SWMP.

Requirements Due by Year 2

- Stormwater management systems designed on commercial and industrial land use area draining to the water quality limited water body shall incorporate designs that allow for shutdown and containment where appropriate to isolate the system in the event of an emergency spill or other unexpected event.

Lake and Pond Phosphorus TMDL

Applicable Receiving Waterbody(ies)	PCP Complete	TMDL/Impairment Name (if applicable)
Sebbins Pond	<input type="checkbox"/>	Phosphorus
	<input type="checkbox"/>	
	<input type="checkbox"/>	
	<input type="checkbox"/>	
	<input type="checkbox"/>	

Annual Requirements Beginning Year 1

- Rank outfalls to these receiving waters as high priority for IDDE implementation in the initial outfall ranking (see IDDE Plan for ranking).

- Distribute an annual message that encourages the proper use and disposal of grass clippings and encourages the proper use of slow-release and phosphorus-free fertilizers as outlined in this SWMP.

- Distribute an annual message encouraging the proper management of pet waste, including noting any existing ordinances where appropriate as outlined in this SWMP.

- Distribute an annual message in the encouraging the proper disposal of leaf litter as outlined in this SWMP.

- Increase 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) as outlined in this plan.

- Establish procedures to properly manage grass cuttings and leaf litter on permittee property, including prohibiting blowing organic waste materials onto adjacent impervious surfaces.

- Retrofit inventory and priority ranking under 2.3.6.1.b. shall include consideration of BMPs to reduce phosphorus discharges.

- Any structural BMPs listed in Table 3 of Attachment 1 to Appendix H already existing or installed in the regulated area by the permittee or its agents shall be tracked and the permittee shall estimate the phosphorus removal by the BMP consistent with Attachment 1 to Appendix H. Document the BMP type, total area treated by the BMP, the design storage volume of the BMP and the estimated phosphorus removed in pass per year by the BMP in each annual report.

Requirements Due by Year 2

- The requirement for adoption/amendment of the permittee's ordinance or other regulatory mechanism shall include a requirement that new development and redevelopment stormwater management BMPs be optimized for phosphorus removal.

Requirements Due by Year 4

- Complete a Phosphorus Source Identification Report.
- The document name (if attached) and/or web address is/are: TBD
- Retrofit inventory and priority ranking under 2.3.6.1.b. shall include consideration of BMPs that infiltrate stormwater where feasible.

Requirements Due by Year 5

- Evaluate all permittee-owned properties identified as presenting retrofit opportunities or areas for structural BMP installation under Permit part 2.3.6.d.ii or identified in the Phosphorus Source Identification Report that are within the drainage area of the impaired water or its tributaries.
- Complete a listing of planned structural BMPs and a plan and schedule for implementation.

Chloride Impairment

Applicable Receiving Waterbody(ies)	TMDL/Impairment Name (if applicable)
McQuesten Brook	Chloride Impairment
McQuade Brook	Chloride Impairment

Annual Requirements Beginning Year 1

- Rank outfalls to these receiving waters as high priority for IDDE implementation in the initial outfall ranking (See IDDE Plan for ranking).

Requirements Due by Year 3

- Develop a Salt Reduction Plan.

Requirements Due by Year 4

- Continue implementation of the Salt Reduction Plan.

Requirements Due by Year 5

- Fully implement the Salt Reduction Plan.

Chloride TMDL

Applicable Receiving Waterbody(ies)	TMDL/Impairment Name (if applicable)
None	

Annual Requirements Beginning Year 1

- Develop and implement a Chloride Reduction Plan.

Measures to Avoid or Minimize Impacts to Public and Known Private Drinking Water Sources (Surface Water and Groundwater)

There are no public surface water drinking water supplies in the Town of Bedford. Public water is supplied by Manchester Water Works and Pennichuck Water Works to customers connected to the public water supply system(s).

Residences and businesses not connected to the public water supply system(s) are served by onsite drinking water wells.

The Town of Bedford currently has designated Low Salt Use areas to protect sensitive water supply wells.

The NHDES has a number of resources available to assist those on private wells in monitoring their water quality. These include but are not limited to:

- The NHDES Be *Well* Informed Guide;
- NHDES Private Well Brochure;
- NHDES Private Well testing Program;

These resources are available at: <https://www4.des.state.nh.us/DWITool/>

The Water Research Foundation has a fact sheet available describing measures that can be taken to protect groundwater potable water supplies from impacts associated with stormwater. The fact sheet is can be viewed at: http://www.waterrf.org/knowledge/source-water-protection-and-management/FactSheets/SourceWater_FactSheet_landUse.pdf