

Town of Pelham, New Hampshire
Good Housekeeping and Pollution Prevention
Operations and Maintenance Procedures
for Municipal-Owned Facilities and Properties

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REGULATORY OPERATION and MAINTENANCE REQUIREMENT:

The 2017 New Hampshire Small Municipal Separate Storm Sewer System (MS4) Permit (the Permit) as issued by the US Environmental Protection Agency (EPA) under the National Pollutant Discharge Elimination System (NPDES) requires the Town of Pelham (the Town) to develop a separate Operations and Maintenance Plan (O&M) within two years of the Permit issue, **June 30, 2020**, to comply with Part 2.3.7 of the Permit. This section of the Permit addresses the requirement of the Town to develop Minimum Control Measures (MCMs) for Good Housekeeping and Pollution Prevention, also referred to as MCM 6 in the Permit. MCMs are a set of best management practices (BMPs) that are required under the Permit and are intended to manage municipal stormwater and reduce nonpoint source pollution from stormwater runoff into local receiving waters.

This O&M Plan for the Town includes an inventory of Town-owned facilities and properties, compiled into similar-type categories, (buildings, highway department facilities, parks and recreational facilities, cemetery, schools, and stormwater infrastructure) that are in the Town's MS4-designated urbanized area, and include specific O&M BMPs associated with each category of property. The responsibility to perform O&M activities for Town-owned facilities and properties rests with each of the Town's various departments. This Plan describes the good housekeeping and pollution prevention BMPs used by Town personnel that are associated with the operations and maintenance activities of these properties.

The Permit identifies four (4) principal categories of permittee-owned facilities/properties that must be included in a formal O&M Plan:

- a) Parks and Open Spaces;
- b) Buildings and Facilities;
- c) Vehicle/Equipment Storage and Maintenance Facilities; and
- d) Stormwater Infrastructure (e.g., catch basins, outfalls, and treatment BMPs)

The following provides an inventory of Town-owned properties and describes the various O&M activities conducted at each location. This Town-wide O&M plan is intended to be a living document and should be updated as facilities and/or current practices change. The Plan should also be used as a reference guide to help maintain consistency and understanding of activities amongst the various departments as well as to help train new employees. The Plan can also assist in tracking and documenting relevant activities for compliance purposes related to future annual MS4 reports.

PERMITTEE OWNED PROPERTIES OPERATION AND MAINTENANCE PROCEDURES

Parks and Open Spaces

Description:

Pelham Parks and Recreation Department has established procedures to address the proper use, storage, and disposal of:

- pesticides, herbicides, and fertilizers including minimizing the use of these products in accordance with manufacturer's instructions;
- trash management;
- pet waste disposal;
- waterfowl management;
- erosion and poor vegetative cover; and
- water management.

To protect water quality, the Department regularly evaluates lawn maintenance and landscaping activities including:

- reduced use of fertilizers, particularly those containing higher levels of phosphorus,
- use of slow-release and/or low phosphorus fertilizers;
- recycling and proper disposal of lawn clippings and other vegetative waste;
- prohibition of blowing organic waste onto adjacent impervious surfaces, or into storm water or surface water areas;
- reducing the overall use of water; and
- use of native and drought resistant landscaping materials.

In addition, established procedures are in place to address areas found to have erosion or poor vegetative cover, especially if the erosion is within 50 feet of surface water.

The Town has established procedures to manage trash containers at parks (i.e., have sufficient number & cleaning frequency) and place signs in areas promoting proper disposal of pet waste.

Municipal Parks and Open Space Inventory:

The following is a list of properties covered by these procedures and includes all municipal facilities where fertilizers are stored, mixed, applied, recycled, or disposed; and municipal properties where lawns or vegetation are mowed, trimmed, and maintained (e.g. parks, disc golf course, and open space properties). As of 2025, the Town contracts out all landscaping activities including mowing, fertilizers, and pesticides. This inventory is reviewed annually and updated as needed.

Parks / Ball Fields / Open Space	Managed Turf	Outdoor Fuel / Chemical Storage	Waste Collection	Sanitary Services	Dog Waste Station
<i>Trails, Green Space, Parks & Outdoor Recreation</i>					
Costa Conservation Area	No	No	No	No	No
Cutler-Spalding Conservation area	No	No	No	No	No
Cutler-Merriam Conservation Area	No	No	No	No	No
Elmer G. Raymond Memorial Park	Yes	No	Yes	No	No
Gumpus Pond Conservation Area	No	No	No	No	No
Kirby-Ivers Town Forest	No	No	No	No	No
Little Island Pond Conservation Area	No	No	No	No	No
Merriam Farm Conservation Area	No	No	No	No	No
Peabody Town Forest	No	No	No	No	No
Spring Street Town Forest, Moose Pond Conservation Area, & Calitri Conservation Area	No	No	No	No	No
Wolven Park	No	No	No	No	No
<i>Sports Fields</i>					
George M Muldoon Park	Weekly	No	Weekly	Yes	Yes
Elmer G. Raymond Athletic Fields	Weekly	No	Weekly	Yes	Yes
Newcomb Field	Weekly	No	Weekly	Yes	Yes

Athletic Fields and Parks	Location	Contracted Services						Other Maintenance:
		Gravel Road Mgmt.	Pavement Mgmt.	Lawn Mowing	Landscaping	Fertilizing	Pesticide/Herbicide	
Veterans Memorial Park	109 Veterans Memorial Parkway	X	X	X	X	X	X	<ul style="list-style-type: none"> • Recycling • Motor Oil • Building maintenance • Beach maintenance • Dog waste station • Restroom • Sanitary System
Dennis P Lyons Memorial Park	6 Village Green	X	X	X	X	X	X	<ul style="list-style-type: none"> • Recycling • Portable restroom • Motor Oil
Golden Brook Park/Newcomb Field	321 Newcomb Field Parkway	X	X	X	X	X	X	<ul style="list-style-type: none"> • Recycling • Portable restroom • Motor Oil
Elmer G Raymond Park	35 Keyes Hill Road	X	X	X	X	X	X	<ul style="list-style-type: none"> • Recycling • Motor Oil • Portable Restroom • Sanitary System
George M Muldoon Park	27 Muldoon Parkway	X	X	X	X	X	X	<ul style="list-style-type: none"> • Recycling • Motor Oil • Portable Restroom • Sanitary System

Responsible Department/Persons:

The Town of Pelham Parks and Recreation Department or their Contracted Service Representative.

Training:

Operation and maintenance procedures training is made available to employees involved in Parks and Open Spaces operations annually. All contractors involved in Parks and Open Spaces operations are provided with the information in this plan.

Training video: <https://www.youtube.com/watch?v=6eD29UBINqE&feature=youtu.be>

Best Management Practices:

The following best management practices (BMPs) employed by the department to minimize potential pollutants in stormwater runoff:

Landscape Maintenance - Contracted Service

- Mulch-mow grasses whenever possible; grass clippings are a natural fertilizer.
- Sweep grass clippings from sidewalks or streets back onto grassy areas.
- Do not blow organic waste into surface waters, including stormwater treatment practices.

- Dispose of organic waste by composting whenever possible. When composting is not possible, dispose of organic wastes at an approved disposal facility. In both cases, ensure that landscape waste in runoff from sites does not enter a waterway.
- Do not wash down or dispose of lawn clippings, leaves, tree trimmings, or other landscape waste in a storm drain, drainage ditch, or open body of water.
- Consider landscape design that utilizes native, drought tolerant vegetation.
- When practicable collect and dispose of waste by cleaning equipment (e.g., grass clippings) in the trash or by composting.
- Irrigate with the minimal amount of water needed. Never water at rates that exceed the infiltration rate of the soil.
- Maintain all irrigation systems so that irrigation uses the minimum amount of water possible, is applied evenly, and does not run off. Repair broken or leaking sprinkler heads as soon as possible.
- Use automatic timers or computer-controlled systems on irrigation equipment to minimize runoff.

Application of Fertilizers – Contracted Service

- Properly calibrate all fertilizer application equipment to ensure proper application rate.
- Time the application of fertilizers to coincide with the manufacturer’s recommendation for best results.
- Only use fertilizers with low or no levels of phosphorus.
- Use slow-release fertilizers.
- Base fertilizer application on soil test results to avoid excess application.
- Train employees in proper application methods, as recommended by the manufacturer.
- Do not apply fertilizers when heavy rainfall or winds are expected.
- Never over-apply fertilizers.
- Designate “no spray zones” and/or “buffer areas” around ponds, lakes, and streams. Avoid spraying fertilizers within 50 feet of any surface water or storm drainage structure (unless stricter limits apply).
- Set mower height to no lower than 3 inches in buffer areas around water features to allow the vegetation to slow down and filter stormwater runoff.
- Do not apply fertilizers or pesticides in or near any drainage areas or drainage conveyances (ditches, swales, catch basins, etc).
- Sweep or blow granular fertilizers and clippings back onto grassy areas, away from pavement and sidewalks.

Storage and Handling of Fertilizers

- Store and mix fertilizers inside a covered area that has an impervious (i.e., hard or paved) surface, preferably indoors, so that spills or leaks will not have contact with soils or waters.

- Do not handle or dispose of fertilizers, pesticides, herbicides, or fungicides in or near storm drains, irrigation ditches, or surface water. Always dispose of it in accordance with local, state, and federal regulations.
- Dispose of excess or leftover chemicals according to the instructions on the label.
- Ensure that spill kits and absorbents are available in the event of a spill. Clean up any spills or leaks of fertilizers or any chemicals promptly using dry cleanup methods.
- Mix only the minimum amount of treatment chemicals that will be needed for the immediate job.

Trash Management - Contracted Service

- Routinely pick up any trash bags left along trails, parks, or streets.
- Empty trash cans and dumpsters regularly.
- Keep lids on all trash cans and dumpsters.

Pet Waste Cleanup

- Post signs in areas concerning the proper disposal of pet waste.
- Provide pet waste bags and waste containers at all parks, trailheads, and open space properties where the Town allows pets.
- Collect pet waste in a bag, and deposit it in a trashcan or dumpster.
- Post signage where pets are NOT allowed in areas.

Waterfowl Waste Management

- Clean and inspect storm drains regularly to prevent wildlife from living in the storm drainage system.
- Scare geese away from ponds at parks.
- Sweep and clean bike paths and paved trails. Collect debris and dispose of it in the trash; do not sweep or wash it into nearby surface water or drainage conveyances.
- Contact local animal or pest control, or New Hampshire and Game Department to remove wild animals from bridges, storm drainage systems, or parks when other means prove unsuccessful.
- Do not feed waterfowl. Post signage to prohibit feeding.
- If in areas where waterfowl congregate due to waste storage or handling, or as result of resident feeding in Town parks, the Town will post educational materials/signage related to feeding, deploy predator (decoys), or plant shrubs or tall grasses along waterbodies to discourage geese from feeding on open grass areas.

Erosion and Poor Vegetative Cover

- Install temporary sediment and erosion control stabilization measures as needed.
- Re-establish grass or native plants, especially within 50-ft of a surface water.

Measurable Goal(s):

Implement the BMP's on 100% of the parks and open spaces.

BMP: Buildings and Facilities Operations and Maintenance Procedures

Description:

These procedures are required at all town owned and operated facilities including schools (to the extent they are permittee-owned or operated), town offices, police, and fire stations, and other permittee-owned or operated buildings or facilities. The purpose of these procedures is to:

- Evaluate the use, storage, and disposal of petroleum products and other potential stormwater pollutants;
- Provide employee training as necessary so that those responsible for handling these products know proper procedures;
- Ensure that Spill Prevention Plans are in place and coordinate with the fire department, as necessary;
- Develop management procedures for dumpsters and other waste management equipment; and
- Sweep parking lots and keep areas surrounding the facilities clean to reduce runoff of pollutants.

The Highway Department is responsible for the maintenance of all Town-owned buildings and facilities except schools. The Highway Department also manages all Town roads and stormwater infrastructure. The Parks and Recreation Department maintains and operates the Town parks and several athletic fields that are used by teams associated with youth sports organizations. The organizations are separate from the school teams like the little league baseball, Razorback football, etc. The schools are all maintained by a separate school maintenance department.

Municipal Buildings and Facilities Inventory:

The following is a list of properties covered by these procedures and includes all schools, municipal offices, all highway and cemetery department facilities, transfer station facility, police, and fire stations, etc. located within the MS4 area. This inventory shall be updated annually during SWMP review.

Facility Name	Location	Outdoor Fuel or Chemical Storage	Vehicle Maint. / Washing	Outdoor Bulk Material	Managed Turf	Waste Receptacles
Highway Dept.	33 Newcomb Field Parkway	Yes	Yes	Yes	Mow	Yes
Transfer Station & Recycling center	74 Newcomb Field Parkway	Yes	Yes	Yes	Mow*	Yes
Cemetery Dept	45 Marsh Road	Yes	Yes	Yes	Mow	Yes
Town Hall	6 Village Green	No	No	No	Mow	Yes
Police Dept.	14 Village Green	No	Yes	No	Mow	Yes
Fire Dept.	36 Village Green	No	Yes	No	Mow	Yes
Public Library	24 Village Green	No	No	No	Mow	Yes

Hobbs Community Center	8 Nashua Road	No	No	No	Mow	Yes
<i>Ancillary Material Storage Areas</i>						
Bulk Material Storage	33 Newcomb Field Parkway	No	No	Yes	No	No
Salt Shed	33 Newcomb Field Parkway	No	No	No	No	No

Notes: *The Transfer Station only mows a small grass area. There is no use of fertilizers or pesticides.

School Facilities

The School Facilities office and maintenance shop are located at 85 Marsh Road. The school maintenance personnel are responsible for maintaining the school buildings and facilities including snow and ice management. All grounds work and waste management are performed by outside contractors.

Inventory of School Department Facilities and Related Operational and Maintenance Activities

School Name	Location	Outdoor Fuel or Chemical Storage	Vehicle Maint. / Washing	Outdoor Bulk Materials	Managed Turf	Waste Receptacles
Elementary School	61 Marsh Road	None	None	None	Yes ³	Yes ³
Memorial School	59 Marsh Road	None	None	None	Yes ³	Yes ³
High School	85 Marsh Road	Yes ¹	Yes ²	None	Yes ³	Yes ³

Notes: ¹5-gallon gas cans;

² Minor equipment repairs and storage;

³ Contracted Service.

Responsible Department/Parties:

The school maintenance department or their contracted representatives.

Training:

Annual maintenance procedures training will be made available to employees involved in Municipal Building and Facilities operations. Contractors involved in Building and Facilities operations are provided with the information given in this section of the SWMP.

Best Management Practices:

The following best management practices (BMPs) will be implemented at all municipally owned or operated buildings and facilities.

Handling, Storage, Transfer, and Disposal of Trash and Recyclables

All liquid and solid waste must be disposed of properly. Some of the most common sources of pollution at municipal facilities are a result of littering, improper collection of debris, and improper

disposal of solid or liquid waste.

- All waste and recycling receptacles must be leak-tight with tight-fitting lids or covers.
- Place waste or recycling receptacles indoors or under a roof or overhang whenever possible.
- Keep lids on dumpsters and containers always closed unless you add or remove material.
- Locate dumpsters on a flat, paved surface and install berms or curbs around the storage area to prevent run-on and run-off.
- Do not locate dumpsters over or adjacent to catch basins.
- Clean up any liquid leaks or spills with dry cleanup methods.
- Prior to transporting waste, trash, or recycling, ensure that containers are not leaking (double bag if needed) and properly secure containers to the vehicle.
- Clean and sweep up any outdoor waste containers regularly.
- Arrange for waste or recycling to be picked up regularly and disposed of at approved disposal facilities.
- Never place hazardous materials, liquids, or liquid-containing waste in a dumpster or recycling or trash container.
- Conduct periodic inspections of solid and liquid waste storage areas to check for leaks and spills.
- In compactor areas, regularly check the hydraulic fluid hoses and reservoir to ensure that there are no cracks or leaks. Regularly sweep the area.

Building Maintenance

- Sweep parking lots and keep areas surrounding facilities clean to reduce runoff of pollutants.
- When power washing buildings and facilities, ensure that the wash water does not flow directly into the storm system. Containment or filtering systems should be provided.
- Paint and other chemicals should not be applied on the outside of buildings when it is raining or prior to expected rain.
- When sanding, painting, power washing, etc., ensure that sites are properly prepared (e.g., use tarps) and cleaned (e.g., use dry cleaning methods) especially if they are near storm drains. Protect catch basins when maintenance work is conducted upgradient of them.
- When painting, use a drop cloth and clean up any spills immediately.
- Do not leave open containers on the ground where they may accidentally tip over.
- Buildings should be routinely inspected for areas of potential leaks.
- Do not discharge chlorinated pool water into the stormwater system. Water must be properly dechlorinated and tested before it is discharged.
- Streets and parking lots surrounding municipal buildings and facilities should be swept and kept clean to reduce runoff of pollutants and debris to the stormwater system.

Storage of Petroleum Products and Potential Pollutants

- Evaluate the use, storage and disposal of petroleum products and other potential stormwater pollutants.
- Routinely inspect buildings and facilities for areas of potential discharges or leaks.

- Floor drains in storage areas should be disconnected from the stormwater system.

Spill Response

- Ensure that spill prevention plans are in place (these should be included for maintenance garages, public works yards, transfer stations and other waste handling facilities - see individual SWPPPs).
- Notify the facility's supervisor immediately and ensure that other staff and/or members of the public are aware of the spill and removed from the spill area as appropriate.
- Coordinate with the fire department, as necessary.
- For large oil spills, NHDES Petroleum Spill Response program will be notified immediately at (603) 271-3644 and an emergency response contractor would be called in.
- Materials and equipment necessary for spill cleanup may include but are not limited to brooms, dust pans, mops, rags, gloves, goggles, kitty litter, sand, sawdust, and plastic and metal trash containers specifically for the purpose.
- Assess the contaminant release site for potential safety issues and for direction of flow.
- The spill area will be kept well ventilated, and personnel will wear appropriate protective clothing to prevent injury from contact with a hazardous substance.
- Spills of toxic or hazardous material will be reported to the appropriate State or local government agency as required by State and Local regulations.
- With proper training and personal protective equipment, complete the following:
 - Stop the contaminant release;
 - Contain the contaminant release using spill containment berms or absorbents;
 - Protect all drains and/or catch basins with the use of absorbents, booms, berms or drain covers;
 - Clean up the spill;
 - Dispose of all contaminated products in accordance with applicable federal, state, and local regulations.

Measurable Goal(s):

Implement the BMP's on 100% of buildings and facilities.

BMP: Vehicles and Equipment Operations and Maintenance Procedures

Description:

Pelham has established procedures for the storage of permittee vehicles. The procedures include:

- Vehicles with fluid leaks shall be stored indoors and containment shall be provided;
- Evaluate fueling areas owned by the permittee or used by permittee vehicles; if possible, place fueling areas under cover to minimize exposure;
- Ensure that vehicle wash waters are not discharged to municipal storm drains or surface waters.

Procedures have been established as outlined below.

Responsible Department/Parties:

The Town of Pelham and their designated departments.

Training:

Annual maintenance procedures training will be made available to employees involved in Vehicle Equipment operations.

Best Management Practices:

The following best management practices (BMPs) will be implemented for all municipally owned or operated vehicles and equipment:

Vehicle Storage

- Vehicles with fluid leaks shall be stored indoors or containment shall be provided until repaired.
- Monitor vehicles and equipment for leaks and use drip pans as needed until repairs can be performed.
- When drip pans are used, avoid overtopping.
- Drain fluids from leaking or wrecked vehicles and parts as soon as possible.
- Dispose of fluids properly.
- Store and park vehicles on impervious surfaces and/or under cover or indoors whenever possible.

Vehicle Maintenance

- All vehicle maintenance and especially fluid exchanges are done inside.
- Waste oil is stored indoors within the waste oil tank.
- Conduct routine inspections of heavy equipment and vehicles to proactively identify maintenance needs or potential leaks.
- Perform routine preventive maintenance to ensure heavy equipment and vehicles are operating optimally.
- Recycle or dispose of waste properly and promptly.
- Sweep and pick up trash and debris as needed.
- Do not dump any liquids or other materials outside, especially near or in storm drains or ditches.

Fueling

- Fueling areas owned or operated by the municipality should be covered if possible.
- Fueling areas should be evaluated to ensure that pollutants (e.g., gasoline or oil) do not enter the MS4.

Vehicle Washing Procedures

Full containment of wash water is ideal and to be achieved when possible. Vehicle wash water shall not be discharged to the MS4 or to surface waters.

Where full containment of wash water cannot be achieved, adhere to the following procedures:

- Avoid discharge of any wash water directly to the storm drainage system or surface water (e.g., stream, pond, or drainage swale)
- Minimize the use of water to the extent practicable.
- Where the use of detergent cannot be avoided, use products that do not contain regulated contaminants. The use of a biodegradable, phosphate-free detergent is preferred.
- Do not use solvents except in dedicated solvent parts washer systems or in areas not connected to a sanitary sewer.
- Do not power wash, steam clean, or perform engine or undercarriage cleaning.
- Grassy and pervious (porous) surfaces may be used to promote direct infiltration of wash water, providing treatment before recharging groundwater and minimizing runoff to an adjacent stormwater system. Pervious surfaces or other infiltration-based systems should not be used within wellhead protection areas or within other protected resources.
- Impervious surfaces discharging to the storm drainage system should not discharge directly to surface water unless treatment is provided. The treatment device should be positioned such that all drainage must flow through the device, preventing bypassing or short-circuiting.
- Periodic sweeping and/or cleaning should be completed to prevent accumulation from forming on the washing area.

Heavy Equipment Washing Procedures

- Mud and heavy debris removal should occur on impervious surfaces or within a retention area.
- Maintain these areas with frequent mechanical removal and proper disposal of waste.
- Impervious surfaces with engineered storm drain systems should not discharge directly to surface water.
- Floor drains should be connected to a sanitary sewer or tight tank. Floor drains discharging to adjacent surface waterbodies or engineered storm drain systems should be permanently plugged or otherwise abandoned before any vehicle wash activities are completed.
- Where the use of detergent cannot be avoided, use products that do not contain regulated contaminants. The use of biodegradable, phosphate-free detergent is preferred.
- Detergents should not be used in areas where oil/water separators provide pre-treatment of drainage.

- Maintain absorbent pads and drip pans to capture and collect spills or noticeable leaks observed during washing activities.

Measurable Goal(s):

Implement the BMP's on 100% of the vehicles.

BEST MANAGEMENT PRACTICES (BMP)

Catch Basin Cleaning Program

Description:

The Town has established a plan for optimizing catch basin cleaning, inspection plans, and its schedule for gathering information to develop the optimization plan. Documentation shall include metrics and other information used to reach the determination that the established plan for cleaning and maintenance is optimal for the MS4. The Town shall keep a log of the catch basins cleaned or inspected. Refer to the Town's Standing Operating Procedures (SOP HW-1: Catch Basin Inspection and Cleaning) for procedures and inspection forms.

The Highway Department performs routine inspections, cleaning, and maintenance of approximately 1700 drainage structures. The Town will implement the following catch basin inspection and cleaning procedures to reduce the discharge of pollutants.

- Routine inspection and cleaning of catch basins. Catch basins should be cleaned such that they are no more than 50% full at any time. The Town 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% 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% full). Priority will also be given to catch basins that discharge to impaired waters;
- The Town has established catch basin SOPs and location map;
- The following information must 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.

Year 7 Totals

Catch basins inspected: 1125

Catch basins cleaned: 1125

Catch basin grit volume removed: 65 yards

Street Sweeping Program

Description:

The Town currently sweeps all public town roads at least once per year. Pelham also sweeps its town-owned parking lots at least once per year in the spring (following winter activities such as sanding). In 2023 and 2024, the Town used a private contractor to sweep. Refer to the Town's Standing Operating Procedures (SOP HW-2: Street Sweeping Procedures) for procedures and inspection forms. The Town has implemented the following street and parking lot sweeping procedures to reduce the discharge of pollutants:

- All streets, except for 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, Pelham will either meet the minimum frequencies above, or develop and implement an inspection, documentation, and targeted sweeping plan outlining reduced frequencies within two (2) years of the effective date of the permit, and submit such plan with its year one annual report;
- The Town has established a street sweeping SOP and streets map;
- 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 above.

Year 7 Totals

Street miles swept: 108.82 miles

Street sweeping material volume removed: 131.16 yards

Winter Road Maintenance Program

Description:

Pelham has implemented the following winter maintenance procedures to reduce the discharge of pollutants. Refer to the Town's Standing Operating Procedures (SOP HW-3: Winter Maintenance Procedures – Snow Removal and Ice Control) for procedures:

- Minimize the use 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. Maintain records of the application of sand and/or de-icing chemicals to document the reduction of chemicals to meet established goals.
- Prevent exposure of deicing product (e.g., 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.

Stormwater Treatment Structures Inspection and Maintenance Procedures

Description:

The Town has implemented inspection and maintenance procedures and frequencies for the town-owned constructed Best Management Practices and stormwater treatment structures such as water quality swales, retention/detention basins, infiltration structures, proprietary treatment devices or other similar structures. All structural stormwater BMPs (excluding catch basins) will be inspected annually at a minimum and maintained as needed. Refer to the Town's Standing Operating Procedures (SOP PL-3: Inspection of Constructed Best Management Practices) for procedures and inspection forms.

Measurable Goal(s):

Inspect and Maintain 100% of treatment structures to ensure they are properly functioning.

SWPPP

Description:

The Town has developed and implemented a Stormwater Pollution Prevention Plan (SWPPP) for each of the following municipally owned or operated facilities: Cemetery department, Pelham School District, Highway Department facilities, transfer stations and other waste handling facilities where pollutants are exposed to stormwater. If facilities are located at the same property, one SWPPP may be developed for the entire property. A SWPPP does not need to be developed for a facility if the permittee has either developed a SWPPP or received a no exposure certification for the discharge under the Multi-Sector General Permit or the discharge is authorized under another NPDES permit. The SWPPP shall include:

- A facility map and a description of the activities that occur at the facility. The map shall show locations of the stormwater outfalls, receiving waters, and any structural controls.
- All identified activities that occur at the facility and the potential pollutants associated with each activity including the location of any floor drains.
- The SWPPP will include instructions for conducting employee training and routine facility inspections and associated documentation forms.

Measurable Goal(s):

Develop and implement SWPPPs for 100% of municipally owned facilities.

Content Source and References

Section 6.6 – MCM #6; Good Housekeeping and Pollution Prevention for Permittee-Owned Operations prepared by Seacoast Stormwater Coalition & Manchester/Nashua Stormwater Coalition; dated June 7, 2019.

Section 6.6 – MCM #6; Good Housekeeping and Pollution Prevention for Permittee-Owned Operation and Procedures; Year 1 and Year 2 Requirements prepared by Seacoast Stormwater Coalition & New Hampshire Lower Merrimack Valley Stormwater Coalition; dated December 31, 2019.

Drafted Operations and Maintenance (O & M) Program; City of Rochester, New Hampshire; Dated June 2019.