

**Storm Water Pollution Prevention Plan (SWPPP)  
for Allenstown Municipal Highway Garage**

**Storm Water Pollution Prevention Plan  
Municipal Highway Garage**

Facility Name: Allenstown Public Works Operations Facility

Facility Address: 165 Granite Street

Allenstown, New Hampshire

**1. STORM WATER POLLUTION PREVENTION PLAN (SWPPP) OVERVIEW**

This document serves as the Stormwater Pollution Prevention Plan (SWPPP) for the Allenstown Public Works Operations Facility and includes a heavy equipment maintenance area, storage yard and materials storage area. Heavy equipment maintenance and storage yards are defined as an uncovered area where any heavy equipment (mowing equipment, excavators, dump trucks, backhoes, bulldozers, etc.) are washed or maintained, or where at least five pieces of heavy equipment are stored. Material storage facilities are defined as an uncovered area where bulk materials (liquid, solid, granular, etc.) are stored in piles, barrels, tanks, bins, crates or other means.

The site is located to the south of Allenstown Center and to the south and east of Route 28. The parcel is 7.7 acres by Granite Street and is identified on assessor's Map 106 as Lot 19. A tax map is attached below. The surrounding area is a sparsely developed, mixed single-family residential and commercial area. Municipal water service is available; municipal sewage disposal is not. The property abutting the site to the northeast, east, southeast, and southwest is an active quarry, except for the portion to the southwest that is mostly undeveloped.

**2. PLANNING AND ORGANIZATION**

**2.1. SWPPP Team**

Allenstown designates the individuals identified below that are responsible for the development and implementation of this Plan and will take the lead in any recommendations for revisions to the Plan. The following serves as the official roster for designated responsibilities implementing the Storm Water Pollution Prevention Plan.

**Leader:** Chad Pelissier Office Phone: 603-485-5460

Title: Road Agent

**Responsibilities:** Coordinates all stages of plan development, inspections and implementation; coordinates employee training programs; keeps all records and ensures that reports are submitted; oversees sampling program.

Team Member: Chad Pelissier Office Phone: 603-485-5460

Title: Road Agent Cell Phone/Beeper # 603-396-3163

**Responsibilities:** Implements the preventive maintenance program; oversees good housekeeping activities; serves as spill response coordinator.

Team Member: Chad Pelissier Office Phone: 603-485 -5460

Title: Road Agent

**Responsibilities:** Conducts/assists with inspections and training program; conducts sampling.

### 3. ASSESSMENT

#### 3.1. Site Description

The facilities covered by this SWPP include operations and maintenance facilities that maintain and store heavy equipment and store materials. Located on site are an office trailer, metal garage, numerous dumpsters and a salt shed. There are also storage areas ranging from yard material (compost), wood chips that are removed after brief storage and some gravel/stones. Approximately 20% of the six acre site has impermeable surfaces such as buildings, roads and other access areas. There are also five monitoring wells associated with this property.

Vehicles stored onsite include:

- Three, 5-7 yard dumps trucks, six wheels
- Five 1-ton dump trucks
- Two cars
- One loader
- One backhoe
- One bulldozer
- One skid steer

Other buildings and equipment onsite include:

- One generator, 200-gallon capacity
- One woodchipper
- One landscaping trailer
- Three flatbed trailers
- Three utility trailers
- Mobile home, serves as administration building, 14' by 72'
- Steel facilities building, 40' by 60'
- Pole barn, equipment storage, 30' by 40'
- Sander racks, 20' by 100'
- Quonset hut, 20' by 24'
- Five outbuildings/sheds for electronics and transfer operations, 12' by 14'
- Two movable tents on blocks, vehicle storage

There are also 16 covered containers/dumpsters onsite; 8 contain solid waste and 8 contain recyclables. There are other open storage areas that include brush pile, compost and white metal recyclables.

Of special note is that there are no fueling stations and the salt storage shed is covered. Vehicle and equipment washing takes place outside with BMPs in place to keep wash water out of catch basins. Any heated buildings utilize waste oil systems. The garage has a floor drain with a recently installed oil-water separator tank including a 5,000 gallon holding tank. Further, a Public Works Facilities Committee is evaluating the possibility of acquiring 2.5 acres behind the existing site for a new garage.

**3.2. Site Map** Attachment 1 is a map of the facility, showing facilities and equipment described in section 3.1 and identifying any potential sources of pollution.

**3.3. Significant Material Inventory**

This inventory (See Attachment 2) includes any waste materials and materials used for operation and maintenance activities at the facility and potentially exposed to stormwater. This list includes the types of material stored, the method and storage location, any stormwater outfall locations, the control measures utilized to minimize exposure of the materials to stormwater.

**3.4. Vehicle Wash Water and Wastewater –**

The discharge of wash water from vehicles to the storm drain is not allowed. Vehicle washing takes place outdoors with any wash water runoff to a small detention pond or evaporating on the surface. Elephant trunks are also placed around catch basins to keep wash water from entering.

**3.5. Salt Storage**

The Town of Allenstown has storage capacity for approximately 60 cubic yards pile of salt that is covered. The storage area is located near the sander racks. The storage pile is covered by waterproof canvas.

**3.6 Spills and Leaks**

There have been no significant spills or chronic leaks at this facility in the past 3 years.

**3.7 Non-Storm Water Discharges**

The Town will continue to visually inspect site on an annual basis to determine if any non-stormwater discharges occur on site. Written certification will be provided by Town officials that all discharges (e.g., outfalls) in the MS4 have been tested or evaluated for the presence of non-storm water discharges. As part of the certification, Allenstown will identify the following:

- The method used and results of any test/evaluation for identified non-storm water discharges.
- Locations of MS4 outfall or drainage points that were checked during the test/evaluation
- Prepare strategy to mitigate any identified issues.

**3.8 Allowable Non-Storm Water Discharges**

Allenstown has some allowable storm water discharges, such as fire hydrants, potable water, compressor condensate, irrigation drainage, landscape watering, pavement washing without detergents, dust control management when it is hot and dry, and exterior building washing without detergents and uncontaminated groundwater.

### **3.9. Existing Storm Water Monitoring Data**

Allenstown has employed an engineering consultant that conducted testing of manholes, catch basins, outfalls and open water. The most recent report can be found at the DPW office.

### **3.10. Site Summary (Sources of pollution with a high risk of contaminating storm water)**

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There are no potential sources or activities that could lead to a risk of contamination that are stored and/or handled at the site that have the potential to be exposed to stormwater.

## **4. IMPLEMENTATION**

This section describes practices that are in place or that will be implemented to control pollutants that have the potential to contaminate storm water.

### **4.1. Good Housekeeping**

BMPs are the activities, prohibition of practices, maintenance procedures, and other management practices used to prevent or reduce the pollution of storm water discharge. BMPs also include treatment measures, operating procedures, and practices to control site runoff, spillage, leaks, sludge or waste disposal, or drainage from raw material storage. BMPs may include any type of pollution prevention and pollution control measure necessary to achieve compliance with the General Permit. The following describes the non-structural (preventative practices) and structural (preventative structures) BMPs utilized by Allenstown.

These prevention practices are utilized by Allenstown to minimize the possibility of pollution of storm water discharge. No hazardous waste is accepted at the facilities.

- No washing of equipment or vehicles to the storm drain is allowed. Washing is done outside and water drains or evaporates off asphalt. There is one catch basin some distance away that drains to a wetland and it is protected during vehicle wash with elephant trunk. Spills are immediately cleaned up with an absorbent.
- All fluid products and wastes are kept indoors.
- Waste oil is collected and placed in a secondary containment tube in a small garage, eventually transferred to holding pods which are stored in a secondary containment areas. All waste oil collected is used as fuel for the Highway Department's waste oil heater.
- Used antifreeze is kept in a sealed container.
- All changing of fluids is done indoors in the maintenance garage or offsite.
- Spillage occurring during addition or removal from salt storage piles or sand and salt pile mixing are promptly cleaned up.
- Backup generator is self-contained and designed to be outside in the elements.
- Trash Bins are closed and secured when not in use.
- Parked vehicles and mobile equipment are checked periodically for drips or leaks; drip pans and/or pads are used as needed.

- Salt is stored in a contained area, away from offsite wetland area.

The following is a list of good housekeeping practices that will be implemented, along with expected date of implementation, at this facility. They are identified as part of the NH DES permit for the facility.

- Within next year, build covered waste oil containment system; funds already established for this project, though additional funds are needed.
- Within the next few years, will have separation tanks and wash bay in new building to be constructed.

#### 4.2. Preventive Maintenance

The Allenstown preventative maintenance program is designed to maintain the facility and equipment in good operating condition, which reduces the potential for pollutants to enter the storm water conveyance system. Employees are expected to follow all of Allenstown's preventive policies during any maintenance activities. Employees also receive training in good housekeeping practices and on the job training. There is an Operations Plan for all operations at the facility that is readily available and visible for staff. It is provided as an Attachment.

The following visual inspections are being performed on a **monthly** basis:

- Proper pump operation, electrical connections and grounding, backup generator fuel tank exterior (visually observe for corrosion or leaks).

The following is a list of preventive maintenance measures.

- This facility has a written spill prevention and response policy
- All staff are aware of spill prevention and response procedures
- Spill response equipment is located at all potential spill areas.
- All transfers to and from any tanks are observed by qualified personnel trained in spill response procedures.
- Catch basins and sediment chambers are checked and cleaned annually.
- Any drainage swales are kept clear.
- Settling basins are cleaned out as necessary.
- Underground storage tank filling areas are inspected regularly for signs of spills.
- Hydraulic equipment is kept in good repair to prevent leaks.
- Outdoor drum and storage tank containment areas are checked for leaks.
- Uncontaminated storm water in containment areas is kept to a minimum.
- Other testing and maintenance of equipment and systems. Please specify.

The following is a list of preventive maintenance measures that will be implemented and the date by which they will be implemented.

- Within 30 days, begin regular inspections of the fueling area for signs of spills or leaks and proper labeling. Hoses and fittings will also be regularly inspected.
- Within 30 days, begin regular inspections of above ground storage tanks for signs of corrosion or leaks.

- Within 30 days, all materials, waste storage areas, drains, tanks and cans will be properly labeled.

#### **4.3. Best Management Practices (BMPs)**

The following is a list of existing and planned Best Management Practices. When implemented, the BMPs will prevent or reduce the discharge of potential pollutants in storm water runoff for each area of concern listed in the Site Summary (Section 3.9).

Loading and unloading areas. To prevent or reduce the potential of storm water contamination in the loading and unloading areas, the following BMPs will be implemented.

- Loading and unloading are done inside where possible.
- When drums are being handled, the storm sewer is covered to help contain potential spills.
- Within 30 days, an emergency spill kit will be placed in the loading/unloading area.
- Within 60 days, a roof will be constructed over the loading area **or** loading/unloading will take place inside.
- Within 90 days, an elevated pad and roof will be constructed over the vehicle fueling area.

Outdoor storage

- Diesel fuel tank. This above ground tank has secondary containment capable of holding the entire contents of the tank. There are plans to construct a roof over the tank.
- A member of the spill response team is on hand at all times during filling.
- Scrap metal. All scrap metal is cleaned of hazardous materials prior to storage on the scrap metal pile. Salvage vehicles have fluids removed prior to storage.
- Dumpster lid is closed except when in use.

#### **4.4. Sediment and Erosion Control**

There are no potential areas for erosion on this site.

#### **4.5. Management of Storm Water Runoff**

The following management practices for runoff are used at this facility. Runoff seeps into the ground onsite. There is one catch basin.

- The site is fairly flat minimizing sheet flow.
- Drainage outfalls discharge to riprap.
- Impervious areas have no curbs in order to encourage sheet flow runoff to vegetative areas.

#### **4.6. Spill Prevention and Response**

Loading/unloading area:

- Spill response equipment is kept in a shed and includes cat litter, speedy dry, absorbent pads, elephant trunk and support from the Fire Department. All personnel are instructed in its location and use.
- The pollution prevention team leader or the spill coordinator will be advised immediately of all spills of hazardous materials or regulated materials, regardless of quantity.
- Spills will be evaluated to determine the necessary response. If there is a health hazard, fire or explosion potential, 911 will be called. If a spill is large or threatens surface waters, including storm drains, state or federal emergency response agencies will be called. NHDES reporting form (Attachment 5) will be submitted as needed.
- Spills will be contained as close to the source as possible with a dike of absorbent materials from the emergency spill kit. Additional dikes will be constructed to protect swales or other storm water conveyances of streams. A cover or dike will protect any other storm water structures such as catch basins.
- The following are contacts that may be notified during a spill response:
  - NHDES Spill Response (Monday through Friday, 8AM to 4 PM): (603) 271-3899
  - NHDES Spill Response (Evenings and Weekends via State Police): (603) 223-4381
  - Allenstown Fire Department: 911
  - Allenstown Police Department: 911
  - USEPA National Response Center: 1-800- 424-8802

#### **4.7. Employee Training**

All Allenstown employees receive training in good housekeeping practices and on the job training in a number of areas pertaining to their specific positions. Allenstown management periodically conducts safety meetings covering topics pertaining to safety, good housekeeping practices and overall facility operations. Staff have all state certifications. The topics depicted in the attached training matrix will be covered at employee training sessions. All employees will be trained.

Pollution prevention team members will meet at least twice a year to discuss the effectiveness of and improvements to the Plan.

### **5. EVALUATION**

#### **5.1. Quarterly Visual Monitoring**

**Every quarter** staff will **visually** examine your site during daylight hours and within 30 minutes after storm water begins to run off. Document any observed contamination/problems with date and time. Determine the source of contamination and take action to eliminate it. A sample quarterly monitoring log is shown in Attachment 4.

#### **5.2. Annual Site Inspections (Comprehensive Site Compliance Evaluation)**

Staff will **inspect** your entire facility at least **once a year**. You must inspect for evidence



of pollution, evaluate BMPs that have been implemented, and inspect equipment. The site inspection report must include date of inspection, name of personnel conducting the inspection, observations, assessment of BMP's, corrective actions taken, and a signed certification.

**Staff will** include this information in a Compliance Evaluation Report. Keep the Report with your SWPPP. Both the Evaluation Report and any reports of follow-up action must be certified. Certification language: "This Compliance Evaluation Report has been prepared by qualified personnel who properly gathered and evaluated information submitted for this Report. The information in this Report, to the best of my knowledge, is accurate and complete." Remember to sign and date the certification.

Allenstown will prepare an annual facility report and it is attached as an Attachment to this SWPPP.

### **5.3. Recordkeeping and Reporting**

Allenstown maintains records of all facility diagrams, SWPPP plan updates, and any other information at the administration building. All records are maintained for a period of not less than five years. These records will be made available to state or federal inspectors upon request. Additionally, employee training records shall also be maintained.

Stormwater issues that are documented include: housekeeping issues, necessary maintenance, follow-up action for spills, necessary BMP modifications and similar issues. The facility will maintain records of spills, leaks, inspections and maintenance activities for at least one year after the permit expires.

### **5.4. Plan Revisions**

Changes in the facility's layout or operations require changes in the Storm Water Pollution Prevention Plan. Staff will describe how changes/revisions to the SWPPP will be made.

This Plan will also be amended if a state or federal inspector determines that it is not effective in controlling storm water pollutants discharged to waterways.

## **6. ENDANGERED SPECIES**

In accordance with Section 1.9.1 of the MS4 Permit, endangered species are not threatened by the MS4 system. Per Appendix C of the Permit, the Merrimack River is potential habitat for Atlantic Sturgeon. In consultation with the National Marine Fisheries Services (NOAA), the series of dams located in the Merrimack River prevent both Atlantic and Shortnose Sturgeon from moving upstream beyond the Essex Dam in Lawrence, MA.

Additional research was conducted on the US Fish and Wildlife Service website. A Section 7(c) species list was created for the project area by the Fish and Wildlife Service and the findings are as follows:

- One Threatened species was present in the area: Small Whorled Pogonia.
- There are no critical habitats in the area.

Per Appendix C, Section D, Step 1 (Determining if Criteria A can be met), there are no endangered species or critical habitat in the project area.

Using best judgment and the information above, we have evaluated the effects of this facility's storm water discharges on listed endangered or threatened species, or critical habitat. We do not have reason to believe that listed endangered or threatened species, or critical habitat would be adversely affected.

7. **HISTORIC PLACES**

In Attachment 7 there is correspondence from the New Hampshire State Preservation Office indicating that there is no potential to cause any impacts on historic places.

8. **CERTIFICATIONS**

Certifications will be signed by an "authorized representative," someone who is at or near the top of your facility's management chain who has the authority to sign and certify this type of document. Modify the certifications as needed. This will include:

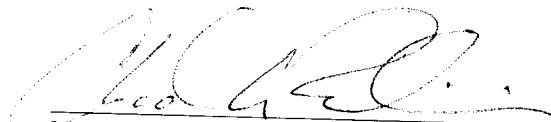
- Non-Storm Water Discharges
- Storm Water Pollution Prevention Plan

**Non-Storm Water Discharges**

All storm water outfalls to surface waters at this facility have been evaluated and found to be free of non-storm water discharges.

**Storm Water Pollution Prevention Plan**

This Storm Water Pollution Prevention Plan has been prepared in accordance with good engineering practices. Qualified personnel properly gathered and evaluated information submitted for this Plan. The information in this Plan, to the best of my knowledge, is accurate and complete.



Name

*Road Agent*

Title

*8/31/2020*

Date

ATTACHMENT 1 - MAP



**Attachment 2  
SWPPP Material Inventory**

<b>Material</b>	<b>Activity/ Use</b>	<b>Quantity stored (tank size if applicable: above or below ground)</b>	<b>Pollutant</b>	<b>Likelihood of contact with storm water? (Low, medium or high)</b>	<b>Comments</b>
Diesel Fuel	Fueling	275 Gallon above ground double walled tank in shed	oily sheen	low	Contained
Heating Oil	Heating	275 Gallon, above ground double walled tank	oily sheen	low	Contained
Used Batteries	Storage & removal	No more than 30, stored in containers	metal/acidic leachate	low	Temporarily stored, awaiting pickup
Vehicles/Equipment	Washing	n/a	salt, grease, oils, detergent	low	BMPs used to keep wash water from catch basins.
Vehicles/Equipment	Storage	n/a	engine oil hydraulic fluid	low - small leaks, drips	repair leaks; use absorbent pads
Waste Oils	Storage	600 gallons/5 tanks	oily sheen	low	Follow NH DES approved plan
Salt storage pile(s)	Storage	Max 30	chlorides	low	Covered, follow DES approved guidelines

Attachment 2. SWPPP Material Inventory - page 2

Material	Activity/Use	Quantity stored (tank size if applicable: above or below ground)	Pollutant	Likelihood of contact with storm water? (Low, medium or high?)	Comments
Used tires	Temporary storage (30 days)	Max 50, then recycling contractor removes	Oils,	low	Stored on pallets and removed periodically
Sand pile(s)	Construction	60 yards	sediment	none	Covered
Compost pile(s)	Stored until needed	100 yards	leachate	low	Follow approved DES guidelines
Dumpster	Solid waste disposal	8 yards/16: 8 trash; 8 recyclables	Trash, grease and other wastes.	low	Secured and covered
Scrap Metal	Granite/stone	30 yards	Solvents, heavy metals, oil, etc.,	low	Uncovered in dumpster

Completed by:

Title:

Date:

**Attachment 2a**  
**Site Summary (Activities with a High Risk of Contaminating Storm Water)**

**Instructions:** List activities with a high risk of contaminating storm water. Describe pollutants that may be associated with these activities. This attachment shows examples. List activities that have a high potential of contaminating storm water at your facility. Examples are shown below. Modify to show your activities, pollutants and current and future practices.

<b>Activity</b>	<b>Pollutants</b>	<b>Current Practices</b>	<b>Future Practices</b>

**Completed by:**  
**Title:**  
**Date:**

**Attachment 3  
List of Significant Spills (> 5 gallons) and Chronic Leaks (NONE)**

**Instructions:** List significant (> 5 gallons) spills of oils, toxic or hazardous materials that have occurred in the last 3 years. Show these areas on the site map.

Date	Spill	Leak	Source	Description			Response Procedures	Measures Taken to Prevent Recurrence
	(check one)			Type of Material	Quantity	Reason		

Completed by:  
Title:  
Date:

**Attachment 4  
Sample Quarterly Visual Monitoring Inspection Log  
for Storm Water Pollution**

<b>Date</b>	<b>Time</b>	<b>Description</b>	<b>Weather Conditions</b>	<b>Observations (contaminants observed/ erosion/sediment runoff)</b>	<b>Probable Source of Any Observed Contamination</b>	<b>Action Taken to Prevent in Future</b>
7/05/03	10 am	02 03	rain rain	no storm water observed no storm water observed	n/a n/a	n/a n/a

Completed by:  
Title:  
Date:



**06-30-20**

**Attachment 5  
NHDES Spill Reporting Form**