

# **Stormwater Pollution Prevention Plan (SWPPP)**

**For: Highway Garage**

**Town of Windham, New Hampshire**



**EPA MS4 NPDES Permit Number NHR041035**

**Updated July 2024**

Stormwater Pollution Prevention Plan  
For  
Town of Windham, New Hampshire (Municipal Highway Garage)

Facility Name: Town of Windham, new Hampshire Highway Department Facility

Facility Address: 2 Ledge Road, Windham, New Hampshire

## **Section 1: Stormwater Pollution Prevention Plan Overview**

This Stormwater Pollution Prevention Plan (SWPPP) does the following:

- Identifies the SWPPP team, by name and title
- Describes the facility, with information on location and activities, a site map, and a description of the Stormwater drainage system;
- Identifies potential Stormwater contaminants;
- Describes Stormwater management control and best management practices (BMPs) needed to reduce pollutants in Stormwater discharges; and
- Describes the facility's monitoring plan.

## **Section 2: Stormwater Management Program Team**

### **SWMP Team Coordinator:**

Position/Title: Town Administrator

Name: Brian McCarthy  
Department: Administration  
Phone Number: 603.432.7732  
Email Address: TownAdmin@windhamnh.gov

### **SWMP Team:**

Position/Title: General Services Director

Name: Dennis Senibaldi  
Department: General Services  
Phone Number: 603.216.5676  
Email Address: dsenibaldi@windhamnh.gov

Position/Title: Environmental Planner

Name: Meaghan O'Dwyer  
Department: Community Development  
Phone Number: 603.432.3806  
Email Address: modwyer@windhamnh.gov

Position/Title: Community Development Director

Name: Alex Mello  
Department: Community Development  
Phone Number: 603.432.3806  
Email Address: amello@windhamnh.gov

Position/Title: General Services Manager

Name: John Devlin  
Department: General Services  
Phone Number: 603.216.5676  
Email Address: [jdevlin@windhamnh.gov](mailto:jdevlin@windhamnh.gov)

## Section 3: Site Description

### Highway Department

The Town of Windham Highway Department Facility is located at 2 Ledge Road, Unit 2, Windham, New Hampshire. The facility includes an operations/maintenance building, salt / sand barn, an employee parking area, accommodations for visitor parking, and a staging yard for equipment. The facility is open to the public, but generally does not service the public at this location..

A map of the facility is included as Attachment 1 of this SWPPP. The map identifies key buildings and sites, the location of all known floor drains that tie into the Stormwater drainage system, Stormwater outfalls, and their receiving waters.

Table 3-1 includes a list of activities that occur at the facility and the potential pollutants that may be associated with each activity.

Table 3-1: Facility activity list and potential pollutants associated with each activity.

Activity #	Description	Potential Pollutants
1	Vehicle and Equipment Maintenance	Vehicle Fluids
2	Salt and Sand Covered Storage	Sand or Salt tracking
3	Employee and limited visitor parking	Vehicle drips
4	Heating Fuel Propane Delivery	Spills / Leaks
5	Temporary Vehicle Storage	Vehicle Fluids
6	Other	To be determined

## Section 4: Implementation

This section describes practices at that are in place or that will be implemented to control pollutants that have the potential to contaminate Stormwater. The following sub-sections describe the relevant management practices that will be implemented as identified in Section 2.3.7.2 (iv) in the MS4 permit. Unless otherwise stated, all measures will be implemented to be consistent with the schedule required in the MS4 permit, or no later than the end of year 5 of the permit if not otherwise described.

### Section 4.1: Minimize or Prevent Exposure

Permit Language: *The permittee shall to the extent practicable either locate materials and activities inside, or protect them with storm-resistant coverings in order to prevent exposure to rain, snow, snowmelt, and runoff (although significant enlargement of impervious surface area is not recommended). Materials do not need to be enclosed or covered if Stormwater runoff from affected areas will not be discharged directly or indirectly to surface waters or to the MS4 or if discharges are authorized under another NPDES permit.*

The site-specific practices will be implemented to minimize or prevent exposure of pollutants to Stormwater runoff:

- Vehicle maintenance and fluid changing occurs in covered facilities;
- Maintain limited gallons (15-20) of used motor oil inside of building
- Best practices for salt storage, spill prevention/response, runoff management, and other key topics will be discussed later in this document.

## **Section 4.2: Good Housekeeping**

Permit Language: *The permittee shall keep clean all exposed areas that are potential sources of pollutants, using such measures as sweeping at regular intervals. Ensure that trash containers are closed when not in use, keep storage areas well swept and free from leaking or damaged containers; and store leaking vehicles needing repair indoors.*

The following list describes good housekeeping practices followed at this facility:

- The facility shall be swept at least annually, or more as-needed, to minimize sediment and associated pollutants from entering the Stormwater drainage system;
- ~~Used antifreeze is kept in a covered container;~~ No used antifreeze is stored on-site
- Spillage of chemicals or sewage will be promptly cleaned and reported as required;
- Drip pans are used when changing fluids, and spigots/funnels are used to minimize drips/leaks;
- All substances requiring secondary containment will be handled as such;
- Leaking vehicles needing repair will be stored indoors;
- Outdoor storage areas will be regularly swept and kept free of leaking or damaged containers.

## **Section 4.3: Preventative Maintenance**

Permit Language: The permittee shall regularly inspect, test, maintain, and repair all equipment and systems to avoid situations that may result in leaks, spills, and other releases of pollutants in Stormwater to receiving waters. Inspections shall occur at a minimum once per quarter.

The following is a list of preventative maintenance procedures practiced at this facility:

- Drainage swales are kept clear;
- Hydraulic equipment is kept in good repair to minimize leaks;
- All materials, waste storage areas, drains, tanks, and cans are properly labeled.

## **Section 4.4: Spill Prevention and Response**

Permit Language: *The permittee shall minimize the potential for leaks, spills, and other releases that may be exposed to Stormwater and develop plans for effective response to such spills if or when they occur.*  
See Section 2.3.7.2 (iv) in the MS4 permit for additional details.

The following is a list of spill prevention and response procedures practiced at this facility:

- This facility has a written spill prevention and response policy that is consistent with the MS4 requirements described in Section 2.3.7.2 (iv);
- Spills will be contained as close to the source as possible with a dike of absorbent materials from the emergency spill kit, and a cover or dike will protect any catch basins or other Stormwater intake structures;
- The assigned spill response team leader will be advised immediately of all hazardous or regulated material spills, regardless of quantity;
- All spills will be evaluated to determine the necessary response;
- Staff are aware of spill prevention and response procedures;
- Spill response equipment is located at potential spill areas;
- Above ground storage tanks are inspected regularly for signs of corrosion or leaks;

## Section 4.5: Erosion and Sediment Control

Permit Language: *The permittee shall use structural and non-structural control measures at the facility to stabilize and contain runoff from exposed areas and to minimize or eliminate onsite erosion and sedimentation. Efforts to achieve this may include the use of flow velocity dissipation devices at discharge locations and within outfall channels where necessary to reduce erosion.*

There are generally few potential areas for erosion on this site. Vegetation around the adjacent drainage path is well established.

Table 4.5-1 lists potential site erosion areas and measures that will be evaluated.

Location #	Description	Erosion Control Measures
1	Access road slope	Seed un-vegetated areas; stabilize sloped area
2	Unpaved parking / storage area	Create riprap or vegetated sediment trap at Stormwater discharge points
3		

## Section 4.6: Management of Runoff

Permit Language: *The permittee shall manage Stormwater runoff from the facility to prevent or reduce the discharge of pollutants. This may include management practices which divert runoff from areas that are potential sources of pollutants, contain runoff in such areas, or reuse, infiltrate or treat Stormwater to reduce the discharge of pollutants.*

The following management practices for runoff are used at this facility:

- Drainage outfalls discharge to riprap pads
- Runoff from the site goes to a [detention/retention basin, vegetated swale, infiltration basin, tree wells, etc.]
- Impervious areas are uncurbed where practical to encourage sheet flow runoff to vegetated areas

## Section 4.7: Salt Storage Piles

Permit Language: *For storage piles of salt or piles containing salt used for deicing or other purposes (including maintenance of paved surfaces) for which the discharge during precipitation events discharges to the permittee's MS4, any other MS4 or to a Water of the United States, the permittee shall prevent exposure of the storage pile to precipitation by enclosing or covering the storage piles. Such piles shall be enclosed or covered within two (2) years of the permit effective date. The permittee shall implement appropriate measures (e.g., good housekeeping, diversions, containment) to minimize exposure resulting from adding to or removing materials from the pile. The permittee is encouraged to store piles in such a manner as not to impact surface water resources, ground water resources, recharge areas, and wells.*

This facility stores and loads/unloads salt in a covered facility to minimize the runoff exposure to any salt stockpiles. Additionally, the floor is maintained so salt stays inside and away from entrance by pushing material back.

## **Section 4.8: Employee Training**

Permit Language: *The permittee shall regularly train employees who work in areas where materials or activities are exposed to Stormwater, or who are responsible for implementing activities identified in the SWPPP (e.g., inspectors, maintenance personnel), including all members of the Pollution Prevention Team. Training shall cover both the specific components and scope of the SWPPP and the control measures required under this Part, including spill response, good housekeeping, material management practices, any best management practice operation and maintenance, etc. EPA recommends annual training.*

Key staff will be regularly trained on Stormwater related topics such as: [revise list as necessary] Stormwater system maintenance practices, salt storage and handling procedures, spill response and cleanup procedures, and other key topics. Please refer to the Town of Windham's Stormwater Management Plan (SWMP) for additional details on employee training.

The Town of Windham will retain records on employee training including:

- The training date, title, and duration;
- Municipal attendee list;
- Subjects covered during training.

## **Section 4.9: Maintenance of Control Measures**

Permit Language: *The permittee shall maintain all control measures, required by this permit in effective operating condition. The permittee shall keep documentation onsite that describes procedures and a regular schedule for preventative maintenance of all control measures and discussions of back-up practices in place should a runoff event occur while a control measure is off-line. Nonstructural control measures shall also be diligently maintained (e.g., spill response supplies available, personnel trained).*

The following is a list of Stormwater control measure maintenance procedures practiced at this facility:

- All control measures required by this permit will be maintained in effective operating condition;
- This SWPPP will be supplemented by on-site documentation describing maintenance procedures and a schedule outlining preventative maintenance of all control measures;
- The Town of Windham will work to develop backup procedures and practices in case a runoff event occurs while a control measure is offline.

## **Section 5.0: Inspection and Record Keeping**

### **Section 5.1: Site Inspections**

The Town of Windham will conduct quarterly (Jan-Mar, Apr-Jun, Jul-Sep, Oct-Dec) inspections of the facility that will cover all areas exposed to Stormwater, and all Stormwater control measures. At least one of the inspections during a period when Stormwater discharge is occurring. Additional inspections will occur on an as-needed basis if significant activities are exposed to Stormwater. The inspections will contain the information included in Attachment 2, an example site inspection form.

If control measures are discovered to need repair or be ineffective, whether as part of a routine inspection or otherwise, the Town of Windham will repair or replace them as soon as practicable, and preferably before the next storm event.

## **Section 5.2: Record Keeping**

The Town of Windham will maintain records of all maintenance, inspection, training, and other activities required by Section 2.3.7.2 of the MS4 permit. Records will be maintained for at least five (5) years, as required by Section 4.2.1 of the MS4 Permit.

## **Section 6: 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 am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Name: \_\_\_\_\_ Title: \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Attachment 1: Facility site map identifying key buildings and sites, the location of all known floor drains that tie into the Stormwater drainage system, Stormwater outfalls, and their receiving waters.

- Salt storage areas (Inside building)
- Emergency generators
- Parking areas
- Administrative/operations buildings



June 2020 facility map



July 2024 Facility Map

Attachment 2: Example Facility Site Inspection Form

Facility Name: \_\_\_\_\_

Facility Address: \_\_\_\_\_

Inspection Date: \_\_\_\_\_ Inspection Time: \_\_\_\_\_

Inspector(s): \_\_\_\_\_

Weather: \_\_\_\_\_

Stormwater Discharge Description (circle one): None   Light   Moderate   Heavy

Stormwater discharge notes, if any: \_\_\_\_\_

Have any previously unidentified discharges been identified as part of this inspection? Yes / No

If yes, describe: \_\_\_\_\_

Are any control measures in need of maintenance or repair? Yes / No

If yes, describe: \_\_\_\_\_

\_\_\_\_\_

Did you identify any failed control measures that need replacement as part of this inspection? Yes / No

If yes, describe: \_\_\_\_\_

Are any changes to the SWPPP needed based on this inspection? Yes / No

If yes, describe: \_\_\_\_\_

Please scan and save a copy of this inspection file and keep the hard copy on-site at least five (5) years after the inspection date.