

Municipality/Organization: City of Leominster, MA

EPA NPDES Permit Number: MAR041203

MassDEP Transmittal Number: W-041009

1. Annual Report Number: Year 12
& Reporting Period: April 1, 2014 – March 31, 2015

2. NPDES PII Small MS4 General Permit Annual Report (Due: May 1, 2015)

Part I. General Information

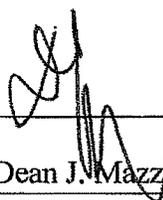
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Certification:

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 gather and evaluate 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.

Signature: 

Printed Name: Dean J. Mazzarella

Title: Mayor

Date: 4-30-2015

Part II. Self-Assessment

During Permit Year 12, the City continued to implement stormwater management practices and has achieved nearly all of the measurable goals for the BMPs selected. The City would like to highlight the following program accomplishments:

- The City has maintained a robust stormwater Public Education and Outreach campaign due in part to their partnership with the Massachusetts Watershed Coalition, a local environmental organization focused on protection and restoration of local watersheds. The City has used multiple forms of media to maximize their stormwater message – Leominster Access TV, public workshops, written brochures and fact sheets, and more.
- The City’s Stormwater Advisory Committee meets regularly to discuss stormwater management activities and was particularly busy in 2014 with final passage of stormwater and erosion control ordinance, regulations and development of review procedures.
- Residents of Leominster have the opportunity to participate in a number of City sponsored events with the environment and clean waters in mind, such as the Annual Monoosnoc Brook Clean-up, Electronics Recycling Day at City Hall, and free workshops at the Leominster Public Library.
- The City continues to leverage local and grant funding to support implementation of green infrastructure on municipal facilities and private property including the Granite Street Stormwater Demonstration Park, municipal roadway green infrastructure installations, the Gateway Project which includes porous pavement demonstration, and the Monoosnoc Brook Walk.
- Two teachers from Samoset Middle School were awarded by the Nashua River Watershed Association for their stormwater education curriculum.
- Maintenance and remediation of several municipally-owned detention basins.
- Winters operations were enhanced through implementation of pre-wetting/pre-treatment, enhancement of ground speed control and through calibration of spreaders. This process greatly reduced the use of sand and chloride, which reduces stormwater pollution.

Part III. Summary of Minimum Control Measures

1. Public Education and Outreach

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 12 (Reliance on non-municipal partners indicated, if any)	Planned Activities
1.1	Educational signage at high-use recreational areas	Recreation & Conservation	Install signage at watershed trail areas and dog park	BMP complete. The City continues to maintain all posted signs as needed. In May 2005, a total of 36 new signs were installed. During Permit Year 10, 10 new Conservation Signs were added at new locations (Sholan Farms, Wachusett St., Hill St., Barrett Park, and Prospect Park) for a total of 46 maintained signs. New signs for dog walkers were added at Barrett Park and Sholan Farms.	Measurable goals for the 2003 General Permit have been met. Continue to maintain signs.
Revised					
1.2	General Education Brochure	DPW Engineering	Develop and distribute mass mailing in water bills	BMP complete. No activities were planned for Permit Year 12. Stormwater educational brochures, based on EPA's educational materials, were distributed in previous Permit Years.	Measurable goals for the 2003 General Permit have been met.
Revised					

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 12 (Reliance on non-municipal partners indicated, if any)	Planned Activities
	Lawn care and pet waste brochure and survey	Engineering and Conservation Commission	Continue Public Education Efforts	<p>Stormwater educational fact sheets and displays continue to be displayed at the library and City Hall, outside of the Building Department office. This display was sponsored by the Leominster Public Library and the Massachusetts Watershed Coalition. The information targets residents, developers, businesses, and other institutions in Leominster. Fact Sheets include:</p> <ul style="list-style-type: none"> • <i>Is Your Lawn Care Stormwater-Friendly?</i> • <i>Making Auto Care Stormwater-Friendly</i> • <i>Pet Waste and Water Quality</i> • <i>Example Rain Garden Illustration</i> • <i>Reducing Pavement & Permeable Paving Options</i> • <i>Using Rock-filled Trenches</i> • <i>Vegetated Swales</i> • Info re: Fertilizers & Water Quality 	<p>Measurable goals for the 2003 General Permit have been met.</p> <p>Continue to work with the Massachusetts Watershed Coalition to provide stormwater informational materials at City buildings.</p>
Revised	Healthy Lawn Workshop	DPW & MassDEP	Broadcast on local cable TV	The City and the Massachusetts Watershed Coalition hosted MassDEP's <i>Healthy Landscaping & Lawn Care Workshop</i> on June 7, 2011 at the Leominster Public Library. A video of this free workshop is available to watch anytime on the	<p>Measurable goals for the 2003 General Permit have been met.</p> <p>The City will consider hosting additional free workshops related to stormwater and nonpoint source pollution.</p>
1.3	Stormwater Curriculum for grades 5 & 6	Conservation & School Dept.	No measurable goals planned for Permit Year 12	Fall Brook Elementary School students, working with the Massachusetts Watershed Coalition, installed a rain	Measurable goals for the 2003 General Permit have been met.

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Revised				<p>garden at the school in May 2009. The City continues to provide support and guidance to the Fall Brook Rain Garden Project, including additional plantings, weeding, public outreach, and scientific investigation by students and teachers.</p> <p>The City partners with Nashua River Watershed Association and local teachers to support implementation of award-winning stormwater program curriculum.</p> <p>A stormwater educational kiosk can be found at the City Hall.</p>	
Revised	Stormwater Runoff Public Service Announcements	Conservation & DPW	Reach as many households as possible	<p>During Permit Year 9, the City hosted a presentation by Ed Himlan of the Massachusetts Watershed Coalition titled, <i>Creating a Rain Garden for Your Home</i> on April 7, 2011 at the Leominster Public Library. A video of this free workshop is available to watch anytime on the LATV website under “Media on Demand.”</p> <p>The City obtained EPA’s new free stormwater DVD, <i>Reduce Runoff: Slow it Down, Spread it out, Soak it in!</i> and it aired on LATV once per quarter. Copies of the DVD are available at City Hall and the library.</p>	<p>Measurable goals for the 2003 General Permit have been met.</p> <p>The City plans to air EPA’s DVD again in Permit Year 13.</p>
	Pet Waste PSA and Brochure	Conservation & DPW	Reach local residents	In previous permit years, a Pet Waste brochure was provided to all licensed dog	Measurable goals for the 2003 General Permit have been met.

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Revised				<p>owners. The City continued to distribute the brochure during Permit Year 12.</p> <p>During Permit Year 12, the Conservation Commission mailed educational letters to homeowners on targeted streets regarding pet waste in catch basins.</p> <p>The City continues to provide educational materials on Pet Waste at City buildings, maintain pet waste stations at public parks, and enforces City Code regarding proper pet waste disposal.</p> <p>Fall Brook 5th Grade students created a Pet Waste PSA called, <i>Scoop it! Bag it!</i> as part of a comprehensive class project addressing the impact of pet waste on the environment.</p>	Continue pet waste outreach efforts.
1.8	Develop Stormwater Website	ConCom & DPW	Add stormwater page to existing web site by Spring '05	<p>Information regarding stormwater management is available on City websites. For example, the DPW Annual Reports, which include stormwater and drainage activities, can be downloaded on the City website (http://www.leominster-ma.gov/).</p> <p>Stormwater related PSAs are available to watch anytime on the LATV website under “Media on Demand” (see BMPs 1.2 and 1.3).</p>	<p>The City plans to improve the DPW and/or Conservation Commission pages to include information more specific to the “Small MS4” General Permit program.</p> <p>A stormwater website is in the process of being updated.</p>
Revised					

2. Public Involvement and Participation

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 12 (Reliance on non-municipal partners indicated, if any)	Planned Activities
2.1 Revised	Stormwater Advisory Committee	Public Works & ConCom	Establish Committee by Fall '03, etc.	The Stormwater Advisory Committee includes City staff from Public Works, Conservation, and Health Departments. The committee meets every other month..	Measurable goals for the 2003 General Permit have been met. The Stormwater Advisory Committee will continue to communicate and meet as needed to discuss stormwater management activities and will be conducting a Stormwater Management/MS4 Program training refresher in 2015.
2.2 Revised	Public Meetings on SWMP	SW Advisory Committee	Host annual public meetings each fall, beginning November 2005	During Permit Year 12, the City hosted educational workshops for the general public on stormwater issues presented by the Massachusetts Watershed Coalition and MassDEP. Please refer to BMPs 1.2 and 1.3. During the Spring of 2014, the City held several public hearings regarding new stormwater and erosion control ordinance and MS4 topics.	Measurable goals for the 2003 General Permit have been met. The Stormwater Advisory Committee will solicit public comment during development of a new Notice of Intent and Stormwater Management Plan when the General Permit is reissued.
2.3 Revised	Shoreline Clean-ups	Public Works & ConCom	Expand annual Monoosnoc Brook cleanup. Remove trees along the north side of the brook through partnership with Mosquito Control.	A City project to clear Monoosnoc Brook for flood control (through a partnership with Mosquito Control) was completed in a previous permit year. The NWRA lead the Monoosnoc Brook Cleanup on April 12th, 2014 from 1 p.m. to 4 p.m. Volunteers pick up trash along the banks and rake the walkways. The annual City-wide City Pride Cleanup Day took place on May 3, 2014.	Continue to support community stewardship for the Monoosnoc Brook watershed through the Nashua River Watershed Association's <i>Monoosnoc Brook Greenway Project</i> (MBGP) and the Massachusetts Watershed Coalition's <i>Monoosnoc Brook Rescue Plan</i> .

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2.4	Catch basin stenciling	Public Works	Stencil priority basins by Fall 2004. Will inspect March 2007.	There was no storm drain stenciling completed in 2014.	Measurable goals for the 2003 General Permit have been met.
Revised					The City will consider additional storm drain stenciling in 2015 as resources allow.
2.5	HHW and Electronics Collection Events	Public Works	Host 4 annual HHW collection events	<p>Measurable goal met. In Permit Year 12, continues to hold Hazardous Waste and Electronics collection events for citizens of Leominster. The HHW days are occurred on March 22, 2014, June 21, 2014, August 23, 2014, and November 22, 2014.</p> <p>The City holds a Spring Recycling Event, collecting items such as electronics, motor oil, and drugs. The Health Department has collection boxes for used syringes, batteries and</p>	Continue to provide information on proper disposal of all rubbish to discourage illegal dumping.

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Revised				<p>ink cartridges. A new drug and battery disposal kiosk has been placed in the Police Department for public use.</p> <p>Drug Take Back Day was held on April 26, 2014.</p> <p>The City conducts spring and fall leaf and yard waste pickup for City residents.</p> <p>The City provides detailed information on the Health Department’s web page (http://www.leominster-ma.gov/health_department_rubbish.htm) regarding how, where, and the cost of disposal for almost any household item (from yard waste to bulk items to construction and demolition materials).</p>	

3. Illicit Discharge Detection and Elimination

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 12 (Reliance on non-municipal partners indicated, if any)	Planned Activities
3.1 Revised	Identify & map outfalls and receiving waters	Engineering	Map all outfalls in GIS by Spring '05	<p>Measurable goal met. The City has completed GIS outfall mapping that includes receiving waters, and has identified 450 outfalls. During Permit Year 12, the City has started to document which outfalls are City-owned. So far, a total of 300 outfalls were identified as City-owned and in the urbanized area. Pipe connectivity is being confirmed in drainage problem areas, during capital improvement projects and during catch basin cleaning. These updates are incorporated into GIS.</p> <p>Additionally, the City has begun to map and track city-owned stormwater control systems.</p>	Measurable goals for the 2003 General Permit have been met. Continue to improve drainage mapping as budget allows.
3.2	Screen outfalls for illicit connections	Public Works	Screen all outfalls by Spring '05	Public Works and the Massachusetts Watershed Coalition have performed in-stream monitoring at priority areas (North Nashua River, Monoosnoc	Upon reissue of the General Permit, the City will refine an Outfall Monitoring Program according to EPA's requirements.

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Revised				<p>Brook) in wet and dry weather.</p> <p>Opportunistic visual inspections are done during catch basin cleaning. Employees are trained on opportunistic inspections for illicit cross-connections.</p> <p>Several cross-connections, failed septic systems, and cracked sanitary lines have been addressed over the permit period.</p> <p>During the summer, the Nashua River Watershed Association, in cooperation with Leominster, conducts water quality sampling at four locations along the Monoosnoc Brook as well as the North Nashua River. Sampling parameters included E. coli, temperature, dissolved oxygen, and conductivity.</p> <p>The Health Department reviews all submitted Title V septic system inspection reports to ensure compliance and prevent pollution. All complaints related to sewage odors or discharges are investigated. All proposed septic system design plans are reviewed and inspections are performed during construction activities.</p>	
3.3	Draft Illicit Connection Bylaw	Engineering & ConCom	Submit to City Council Spring '04	BMP complete. The City amended their Municipal Code of Ordinances on March 28, 2005. <i>Article V. Illicit Connections and Discharges to the Storm Drain System</i> was added to Chapter 21 – Water & Sewers, which	Measurable goals for the 2003 General Permit have been met.

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 12 (Reliance on non-municipal partners indicated, if any)	Planned Activities
Revised				prohibits illicit discharges to the MS4 and City waters, illicit connections, and obstructions of the drainage system.	
3.4 Revised	Revise Sewer and Drain Use Regulations	Engineering	Revise and adopt with new Illicit bylaw	See BMP 3.3 above. The City staff that clean the City’s catch basins report violations of the City Code regarding improper pet waste disposal to the Director of Public Works.	Measurable goals for the 2003 General Permit have been met. Continue to enforce the Municipal Code of Ordinances Chapter 6 <i>Dogs</i> § 6-8. <i>Pet waste disposal</i> to the extent possible based on observed violations.

4. Construction Site Stormwater Runoff Control

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 12 (Reliance on non-municipal partners indicated, if any)	Planned Activities
4.1	Construction Site ESC Bylaw and regulations for sites >1-acre	Con Com, Public Works	Review existing mechanisms for adequacy and completeness by Spring '05, etc.	The City of Leominster passed the Stormwater and Erosion Control Ordinance in Chapter 21 of the City Code on July 14, 2014 with an effective date of January 1, 2015. The Stormwater Committee provided outreach to businesses about the new ordinance in late fall 2014.	Measurable goals for the 2003 General Permit have been met.
Revised					
4.2	Site Plan Review	Planning, Building & Engineering	Incorporated into Development Review Board process with appropriate ordinance changes	Improved construction site runoff control procedure review requirements are included in the Stormwater and Erosion Control Ordinance and Regulations developed thereunder.	Measurable goals for the 2003 General Permit have been met.
Revised					
4.3	Site Inspections	Health Dept. & ConCom	Implement new site inspection process for Spring '07	The Health Inspector and/or the Conservation Agent/Environmental Inspector have performed weekly	Measurable goals for the 2003 General Permit have been met.

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 12 (Reliance on non-municipal partners indicated, if any)	Planned Activities
Revised				inspections at all construction sites since 2005. The City maintains records of site inspections and persistently enforces local stormwater requirements. There were at least four non-compliance orders regarding erosion controls during Permit Year 12. A list of projects on hold or under enforcement (non-conformance orders) is available through the Conservation Agent. The City has documentation for all site inspections.	Continue construction site inspections by City personnel.
4.4	Establish system to report non-compliant activities	Con Com	Establish during 2004 construction season & use web site reporting	The Conservation Agent has taken the lead in conducting inspections of construction sites. The Conservation Agent receives calls and complaints from the public, which are reported, along with any action taken, to the Conservation Commission in the Agent's monthly reports.	The City will publish additional information on the web regarding situations when citizens should report non-compliant activities and who to call as part of BMP 1.8.
Revised					

5. Post-Construction Stormwater Management in New Development and Redevelopment

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 12 (Reliance on non-municipal partners indicated, if any)	Planned Activities
5.1	Stormwater Management Ordinance and regulations for sites >1-acre	Con Com	Research and/or revise existing ordinances to comply with SWMP	The City of Leominster passed the Stormwater and Erosion Control Ordinance in Chapter 21 of the City Code on July 14, 2014 with an effective date of January 1, 2015. The Stormwater Committee provided outreach to businesses about the new ordinance in late fall 2014.	Measurable goals for the 2003 General Permit have been met.
Revised					

6. Pollution Prevention and Good Housekeeping in Municipal Operations

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 12 (Reliance on non-municipal partners indicated, if any)	Planned Activities
6.1	Employee Training	Public Works	Conduct stormwater training each winter	During Permit Year 12, City staff involved with the Stormwater Committee are being trained on MS4 compliance and basic stormwater practices on April 17, 2015.	Measurable goals for the 2003 General Permit have been met.
Revised				Staff from the Stormwater Committee continues to receive hands-on training from the Massachusetts Watershed Coalition through training and public presentations.	Continue to identify training workshops for Stormwater Advisory Committee members and City staff responsible for implementing the SWMP.
6.2	Street Sweeping	Public Works	Sweep all City streets annually by 6-30 and downtown areas once a week. Sweep outfall areas while doing main roads.	The City currently sweeps streets twice per year and three times per week downtown. The city bought a new mechanical street sweeper for a total of three street sweepers.	Measurable goals for the 2003 General Permit have been met. Continue the annual street sweeping program.
Revised					
6.3	Predictive catch basin cleaning program	Public Works	Clean all basins once per year (3600). Total costs per year.	The City cleaned 6,792 catch basins in Permit Year 12 and removed approximately 3,860 tons of material during catch basin cleaning operations. Now using a Vactor to clean some basins with BMPs (such as hoods). Catch basins near sensitive resource areas such as streams are cleaned multiple times per year. The City has a cooperative agreement with Clinton, MA for permitted disposal of catch basin residuals.	Measurable goals for the 2003 General Permit have been met. Upon reissuance of the General Permit, prioritize the cleaning schedule to reach outfall areas and other sensitive areas first.
Revised					

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 12 (Reliance on non-municipal partners indicated, if any)	Planned Activities
6.4	O&M Schedule for City owned structural BMPs	Engineering	Implement program by Spring '05	The City owns and operates a number of stormwater control systems throughout the City. Over the past several years the City has begun to populate both public and private system data into GIS and currently has over 215 stormwater control systems mapped. Ownership attributing is ongoing and the City maintains an active maintenance program for City-owned systems as resources afford. O&M Plans for these BMPs were developed for compliance with local permits. The City pays for third party operation and maintenance of BMPs..	<p>Measurable goals for the 2003 General Permit have been met with refinements to GIS ownership attributing and maintenance program schedules.</p> <p>Upon reissuance of the General Permit, the City plans to formalize their O&M procedures for City-owned properties and infrastructure according to EPA's requirements..</p>
6.5	Vehicle Washing: separate garage floor drains	Public Works	Tie garage drains into sanitary sewer	<p>In prior permit years, the City determined that it was necessary to install an oil/water separator at the Public Works facility and redirect the floor drains to the sanitary sewer. All of the recommended work at the DPW garage has been completed, including retrofitting catch basins with hoods, eliminating floor drain sumps, and installing new drain and sewer lines.</p>	BMP complete. Measurable goals for the 2003 General Permit have been met.
Revised					

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 12 (Reliance on non-municipal partners indicated, if any)	Planned Activities
6.6 Revised	Separate Combination Sewer/Drain Manholes	Public Works	Separate when encountered	Completed all 500 separations by September 2011.	BMP complete. Measurable goals for the 2003 General Permit have been met.
6.7 Revised	Repair leaking sewer trunk lines	Public Works	Relined leaking sewer trunk line – Granite Street	Several sewer line repairs and relining's were conducted in 2014. Three catch basins were removed from sanitary sewer lines in Permit Year 12. 500 feet of sewer line was replaced on Main Street, and 700 feet of sewer line was replaced on Whitney Street.	The Sewer Department will continue to repair and replace problematic sewer lines as budget is available.

7. BMPs for Meeting Total Maximum Daily Load (TMDL) Waste Load Allocations (WLA)

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 12 (Reliance on non-municipal partners indicated, if any)	Planned Activities
7.1 Revised	Check current impairment lists and TMDL status	Public Works	Annually review the current MA Integrated List of Waters	Reviewed the Proposed Massachusetts 2012 Integrated List of Waters and MassDEP TMDL website. Monoosnoc Brook and the North Nashua River are listed as Category 5 waterbodies requiring development of a TMDL for E.Coli (pathogens). A draft pathogen TMDL report is available for the Nashua River Watershed, which includes these water bodies.	The TMDL and impairment status of receiving waters in Leominster’s Urbanized Area will be reevaluated during development of the next NOI for compliance with the reissued General Permit. The City will determine appropriate BMPs given the pollutants of concern and targeted land uses and activities in impaired watersheds.
7.2 Revised	Bring sanitary sewer to 2 streets in 2007	New England Development	Finish in 2007	Completed in September 2007.	BMP complete. Measurable goals for the 2003 General Permit have been met.
7.3 Revised	Street Sweeping Summer/Fall 2007	Public Works	Increase sweeping to 3-4 times/yr. in watershed areas.	BMP complete. See BMP 6.2.	Upon reissuance of the General Permit, prioritize the sweeping schedule to reach watershed areas and other sensitive areas first.

7b. WLA Assessment

At this time, there are no final TMDLs for receiving waters in Leominster’s Urbanized Areas. The City will reevaluate the status of receiving waters once the General Permit is reissued and will consider adding BMPs to address pollutants of concern during development of the next NOI.