

Municipality/Organization: City of Leominster, MA

EPA NPDES Permit Number: MA0100617

MassDEP Transmittal Number: W-041009

Annual Report Number & Reporting Period: Year 9
April 1, 2011 – March 31, 2012

NPDES PII Small MS4 General Permit Annual Report (Due: May 1, 2012)

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: 3/27/12 _____

Part II. Self-Assessment

During Permit Year 9, 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 largely through 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.
- 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 has identified and mapped all known outfalls in the Urbanized Area.
- The *Illicit Connections and Discharges to the Storm Drain System Ordinance* was adopted in March 2005.
- The Granite Street Stormwater Park is being retrofitted with stormwater best management practices (BMPs) to treat the first one-half inch of run-off from approximately four acres of asphalt pavement roadway in the City. The existing stormwater infrastructure collects untreated runoff from a series of catch basins, which is discharged directly to the Monoosnoc Brook. The Brook has been significantly impacted by this discharge, as demonstrated by a deposit of sand directly at the outfall. In fall of 2010 the sediment vault, infiltration trench and a 1,299 square foot bio-cell were installed. Additional treatment practices were installed in Spring 2011, which included a gravel wetland and tree box filters. Additional work planned includes a porous driveway, permeable walking paths and interpretive signage.

The City is still in progress implementing some BMPs and permit requirements. The City currently reviews nearly all projects disturbing one acre or greater through the existing local permitting process (Conservation Commission, ZBA, Planning Board, and Building Department). The Stormwater Advisory Committee presented a stormwater ordinance to City Council in March 2005 that was not adopted. A revised *Stormwater and Erosion Control Ordinance* is now before City Council and the City Solicitor in the final stages before adoption.

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 9 (Reliance on non-municipal partners indicated, if any)	Planned Activities
1.1 Revised	Educational signage at high-use recreational areas	Recreation & Conservation	Install signage at watershed trail areas and dog park	BMP complete. A total of 36 new signs were installed in May 2005. The City maintains all posted signs as needed.	Measurable goals for the 2003 General Permit have been met. Continue to maintain signs.
1.2 Revised	General Education Brochure	DPW Engineering	Develop and distribute mass mailing in water bills	BMP complete. No activities were planned for Permit Year 9. 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.
	Lawn care and pet waste brochure and survey	Engineering and Conservation Commission	Continue Public Education Efforts	This year stormwater educational fact sheets and display were moved from the library to 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: <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 	Measurable goals for the 2003 General Permit have been met. Continue to work with the Massachusetts Watershed Coalition to provide stormwater informational materials at City buildings.

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 9 (Reliance on non-municipal partners indicated, if any)	Planned Activities
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 was also broadcast on LATV and is available to watch anytime on the LATV website under "Media on Demand." (http://www.leominster.tv/publicweb/SitePages/latv_mod.aspx)	Measurable goals for the 2003 General Permit have been met. Host additional free workshops related to stormwater and nonpoint source pollution when possible.
1.3 Revised	Stormwater Curriculum for grades 5 & 6	Conservation & School Dept.	No measurable goals planned for Permit Year 9	The City was unable to fund the Theater for Children one day environmentally-focused performance this year due to a rise in cost and budget constraints. Fall Brook Elementary School students, working with the Massachusetts Watershed Coalition, installed a rain garden at the school in May 2009. This project is ongoing, including additional plantings, weeding, public outreach, and scientific investigation by students and teachers. Several Leominster teachers attended Project WET workshops taught by Jim Lafley, the MA Project WET Coordinator. Educators are encouraged to integrate Project WET information and activities into existing curricula.	Measurable goals for the 2003 General Permit have been met. Continue to pursue opportunities to incorporate stormwater and nonpoint source pollution into Leominster's curriculum as budget allows.

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 9 (Reliance on non-municipal partners indicated, if any)	Planned Activities
Revised	Stormwater Runoff Public Service Announcements	Conservation & DPW	Reach as many households as possible	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 was also broadcast on LATV and is available to watch anytime on the LATV website under “Media on Demand.” (http://www.leominster.tv/publicweb/SitePages/latv_mod.aspx)	Measurable goals for the 2003 General Permit have been met. The City plans to air EPA’s DVD again this year.
Revised	Pet Waste PSA and Brochure	Conservation & DPW	Reach local residents	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 in August 2011 and October 2011. Copies of the DVD are available at City Hall and the library. A Pet Waste brochure was mailed to all licensed dog owners in previous permit years. 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. The Pet Waste PSA called, <i>Scoop it! Bag it!</i> , created by Fall Brook 5 th Grade students as part of a comprehensive class project addressing the impact of pet waste on the environment, was also broadcast on LATV and is available to watch anytime on the LATV website under “Media on Demand.”	Measurable goals for the 2003 General Permit have been met. Continue pet waste outreach efforts.

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 9 (Reliance on non-municipal partners indicated, if any)	Planned Activities
1.8	Develop Stormwater Website	ConCom & DPW	Add stormwater page to existing web site by Spring '05	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/). Stormwater related PSAs are available to watch anytime on the LATV website under "Media on Demand" (see BMPs 1.2 and 1.3).	The City plans to improve the DPW and/or Conservation Commission pages to include information more specific to the "Small MS4" General Permit program.

2. Public Involvement and Participation

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 9 (Reliance on non-municipal partners indicated, if any)	Planned Activities
2.1	Stormwater Advisory Committee	Public Works & ConCom	Establish Committee by Fall '03, etc.	The Stormwater Advisory Committee includes City staff from Public Works, Conservation, Health, and Water Departments. In Permit Year 9, this Committee met on the following dates: <ul style="list-style-type: none"> • August 24, 2011 • October 20, 2011 • January 17, 2012 • March 9, 2012 • March 21, 2012 • March 22, 2012 	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.

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 9 (Reliance on non-municipal partners indicated, if any)	Planned Activities
2.2 Revised	Public Meetings on SWMP	SW Advisory Committee	Host annual public meetings each fall, beginning November 2005	The City hosted educational workshops for the general public on stormwater issues presented by the Massachusetts Watershed Coalition and MassDEP in Permit Year 9. Please refer to BMPs 1.2 and 1.3.	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 reissued General Permit is finalized.
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.	The Annual Monoosnoc Brook Cleanup was held from 10 a.m. to noon on August 5, 2011 in downtown Leominster. According to the Nashua River Watershed Association, over 120 tons of trash have been removed. The Monoosnoc Brook Greenway Project celebrated its 25th year. A City project to clear Monoosnoc Brook for flood control (through a partnership with Mosquito Control) was completed in a previous permit year. The annual City-wide City Pride Cleanup Day was held on May 7, 2011.	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> . The next annual City-wide City Pride Cleanup Day is scheduled for May 5, 2012.
2.4 Revised	Catch basin stenciling	Public Works	Stencil priority basins by Fall 2004. Will inspect March 2007.	BMP complete. Storm drain stenciling was completed by volunteer groups in September 2005. Upon inspection, Public Works noted that the stenciling has worn and should be redone.	Measurable goals for the 2003 General Permit have been met. Upon reissuance of the General Permit, City will reassess the appropriateness of this BMP.

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 9 (Reliance on non-municipal partners indicated, if any)	Planned Activities
2.5	HHW and Electronics Collection Events	Public Works	Host 4 annual HHW collection events	Measurable goal met. In Permit Year 9, Public Works hosted Hazardous Waste Collection days on June 25, 2011, August 27, 2001, November 19, 2011, and March 24, 2012. The City collected 668 gallons of used oil and 397 units of paint. All-American-Recycling joined the City on January 14, 2012 for an Electronics Recycling day at City Hall.	Continue to hold Hazardous Waste and Electronics collection events for citizens of Leominster. Continue to provide information on proper disposal of all rubbish to discourage illegal dumping.
Revised				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).	

3. Illicit Discharge Detection and Elimination

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 9 (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.	Measurable goal met. The City has completed GIS outfall mapping that includes receiving waters, and has identified 450 outfalls.	Measurable goals for the 2003 General Permit have been met. Continue to improve drainage mapping as budget allows.

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 9 (Reliance on non-municipal partners indicated, if any)	Planned Activities
3.2 Revised	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 (Nashua River, Magoosnoc Brook) in wet and dry weather. The City has not performed dry weather screening at all of their outfalls.	Upon reissue of the General Permit, the City will develop an Outfall Monitoring Program according to EPA's requirements.
3.3 Revised	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 prohibits illicit discharges to the MS4 and City waters, illicit connections, and obstructions of the drainage system.	Measurable goals for the 2003 General Permit have been met.
3.4 Revised	Revise Sewer and Drain Use Regulations	Engineering	Revise and adopt with new Illicit bylaw	See BMP 3.3 above.	Measurable goals for the 2003 General Permit have been met.

4. Construction Site Stormwater Runoff Control

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 9 (Reliance on non-municipal partners indicated, if any)	Planned Activities
4.1 Revised	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 currently reviews nearly all projects disturbing one acre or greater through the existing local permitting process (Conservation Commission, ZBA, Planning Board, and Building Department). The Stormwater Advisory Committee presented a stormwater ordinance to City Council in March 2005 that was not adopted. A revised <i>Stormwater and Erosion Control Ordinance</i> is now before City Council and the City Solicitor in the final stages before adoption.	The Stormwater Advisory Committee will continue efforts to adopt the <i>Stormwater and Erosion Control Ordinance</i> as soon as possible.
4.2 Revised	Site Plan Review	Planning, Building & Engineering	Incorporated into Development Review Board process with appropriate ordinance changes	Changes to the existing Site Plan Review ordinance and procedures were investigated in a prior permit year.	Improved construction site runoff control requirements will be included in the <i>Stormwater and Erosion Control Ordinance</i> and Regulations developed thereunder.
4.3 Revised	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 inspections at all construction sites since 2005.	Continue construction site inspections by City personnel. Additional construction site runoff control measures and site inspection requirements will be included in the <i>Stormwater and Erosion Control Ordinance</i> and Regulations developed thereunder.

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 9 (Reliance on non-municipal partners indicated, if any)	Planned Activities
4.4	Establish system to report non-compliant activities	Con Com	Establish during 2004 construction season & use web site reporting	ConCom has taken the lead in doing site inspections of construction sites during heavy rain events and every week during construction. 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 non-compliant activities and who to call as part of BMP 1.8. Continue to enforce the Municipal Code of Ordinances Chapter 6 <i>Dogs § 6-8. Pet waste disposal</i> to the extent possible based on observed violations.
Revised				The contractors that clean the City's catch basins report violations of the City Code regarding proper pet waste disposal to the Director of Public Works.	

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 9 (Reliance on non-municipal partners indicated, if any)	Planned Activities
5.1	Stormwater Management Ordinance and regulations for sites >1-acre	ConCom	Research and/or revise existing ordinances to comply with SWMP	The City currently reviews nearly all projects disturbing one acre or greater through the existing local permitting process (Conservation Commission, ZBA, Planning Board, and Building Department). The Stormwater Advisory Committee presented a stormwater ordinance to City Council in March 2005 that was not adopted. A revised <i>Stormwater and Erosion Control Ordinance</i> is now before City Council and the City Solicitor in the final stages before adoption.	The Stormwater Advisory Committee will continue efforts to adopt the <i>Stormwater and Erosion Control Ordinance</i> as soon as possible.
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 9 (Reliance on non-municipal partners indicated, if any)	Planned Activities
6.1	Employee Training	Public Works	Conduct stormwater training each winter	<p>One or more City representatives attended the following stormwater training workshops:</p> <p>MACC Environmental Conference. March 3, 2012. Sessions attended:</p> <ul style="list-style-type: none"> • <i>Stormwater Quality Treatment BMPs: A Structural Stormwater Best Management Practices Overview.</i> • <i>An Update on Several Stormwater Permits in Massachusetts: What Conservation Commissioners Need to Know</i> • <i>Erosion and Sediment Control: Beyond Hay Bales and Silt Fences</i> <p>SuAsCo Conference. <i>Municipal Funding Strategies for Stormwater Management.</i> December 13, 2011.</p> <p>Massachusetts Watershed Coalition conference. May 19, 2011. Sessions attended:</p> <ul style="list-style-type: none"> • <i>Planning and Designing Better Development Sites.</i> • <i>Massachusetts Stormwater Regulations.</i> • <i>A Community Guide to Growing Greener.</i> <p>EPA 2012 Construction General Permit webinar. March 15, 2012.</p>	<p>Continue to identify training workshops for Stormwater Advisory Committee members and City staff responsible for implementing the SWMP.</p> <p>Continue to work with the Nashua River Watershed Association and Massachusetts Watershed Coalition on sampling efforts where City staff can receive hands-on training (as has occurred in prior permit years).</p>
Revised					

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 9 (Reliance on non-municipal partners indicated, if any)	Planned Activities
6.2 Revised	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 twice per week downtown. In Permit Year 9, the City swept approx. 400 street miles and collected 2,128 tons of material.	Continue the annual street sweeping program.
6.3 Revised	Predictive catch basin cleaning program	Public Works	Clean all basins once per year (3600). Total costs per year.	The City cleaned 3,143 catch basins in Permit Year 9. Now using a Vactor to clean some basins with BMPs (such as hoods).	Upon reissuance of the General Permit, prioritize the cleaning schedule to reach outfall areas and other sensitive areas first.
6.4	O&M Schedule for City owned structural BMPs	Engineering	Implement program by Spring '05	The City owns and operates a number of structural BMPs through watershed restoration projects with BMP retrofits. These projects include the Granite Street Stormwater Park (completed in Permit Year 9), the Rockwell Pond Source Reduction Pilot Project, and the Lower Monoosnoc Brook Remediation Project (in progress). BMPs in use include bioretention areas or rain gardens, infiltration trenches, a sediment vault, a gravel wetland, tree box filters, and more. O&M Plans for these BMPs were developed for compliance with local permits.	Continue to work with the Massachusetts Watershed Coalition on these watershed restoration projects that include structural BMPs as funding is available. Additional work planned for the Granite Street Stormwater Park includes a porous driveway, permeable walking paths, and interpretive signage. Continue to develop O&M Plans for each new structural BMP.

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 9 (Reliance on non-municipal partners indicated, if any)	Planned Activities
Revised	O&M Schedule for City owned structural BMPs (continued)			<p>Drainage repairs, drain/sewer separations and drain installation was done on a total of 47 streets during the construction season. This work consisted of installing new under-drains, new catch basins, new manholes, new drain lines, culvert repairs, and broken sewer line repairs.</p> <p>The Department of Public Works is responsible for snow removal City-wide, including all municipal parking lots, the Library, City Hall, Court House, Schools, downtown, Housing Authority parking lot, Senior Center, and Public Works facility.</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.
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. Much 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>	If budget is available, complete remaining work to redirect all DPW garage floor drains to the sanitary sewer.
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.

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 9 (Reliance on non-municipal partners indicated, if any)	Planned Activities
6.7	Repair leaking sewer trunk lines	Public Works	Relined leaking sewer trunk line – Granite Street	Sewer line repairs were completed at West at School Street, Lindell Avenue, Whitney Street, and Mechanic at Seventh Street. 1,500 feet of sewer trunk line was relined on Industrial Road.	The Sewer Department will continue to repair and replace problematic sewer lines as budget is available.
Revised					

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 9 (Reliance on non-municipal partners indicated, if any)	Planned Activities
7.1	Targeted education to septic system owners	Health Dept & Engineering	Develop & distribute phosphorous reduction brochure	As required by Part II.D.2 of the General Permit, the City with help from their consultant evaluated the appropriateness of this BMP and determined that it was not appropriate. We have replaced this BMP as described. The intent of the replaced BMP is met through ongoing Public Education and Outreach efforts described in Section 1.	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.
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.	

7.2 Revised	Bring sanitary sewer to 2 streets in 2007	New England Development	Finish in 2007	BMP completed in September 2007. Additional sanitary sewer extensions, such as Debbie Drive in Fall 2012, are ongoing.	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.