

Municipality/Organization: City of Leominster, MA
EPA NPDES Permit Number: MAR041203
MassDEP Transmittal Number: W-041009
Annual Report Number & Reporting Period: Year 13
April 1, 2015 – March 31, 2016

1. NPDES PII Small MS4 General Permit Annual Report (Due: May 1, 2016)

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:  4-25-16

Part II. Self-Assessment

During Permit Year 13, 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:

- In Permit Year 13, the City's current IDDE program was reviewed, refined and updated into a written Program Manual. The Program Manual outlines regulatory authority, screening, investigation and elimination workflow processes and identifies priority catchments. A key component of Leominster's IDDE program, is the use of opportunistic inspections as a method to identify illicit discharges. A SOP for opportunistic inspections was refined and developed as a part of the development of the IDDE Program Manual. On December 3, 2015, 45 City of Leominster employees were introduced to the City IDDE Program and trained on the fundamentals of illicit discharges, how to identify an illicit discharge, and the SOP for opportunistic inspections.
- 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.
- 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. In addition, the 2015 Adams/Cotton Street project included the installation of (2) 1500 Gallon Stormwater Detention Vaults, a BioSwale/Recharge Trench, and a Treebox for improved stormwater infiltration. The City and Massachusetts Watershed Coalition led a Walk For Green Infrastructure Tour in 2015 in Leominster to highlight green infrastructure installations across the community. Approximately 25-30 people attended.
- Maintenance and remediation of several municipally-owned detention basins. The City continues to perform ongoing inspections of city-owned stormwater treatment systems.
- In PY13, the City of Leominster replaced 38 catch basins and installed 2100 feet of drain pipe. Additionally, a Stormceptor water quality treatment device was installed as part of the MassDOT Whitier Bridge Project.

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 13 (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. New Conservation signs were installed on new businesses when required. Leominster does not currently have a dog park.	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 13. Stormwater educational brochures, based on EPA’s educational materials, were distributed in previous Permit Years and are readily available at the City Hall.	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 13 (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> • <i>Fertilizers & Water Quality</i> <p>Information on saving water outdoors is available at: http://www.leominster-ma.gov/depts/safety/pw/water/tips.asp</p>	<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>
	Healthy Lawn Workshop	DPW & MassDEP	Broadcast on local cable TV	The City and the Massachusetts Watershed Coalition hosted MassDEP's <i>Healthy Landscaping & Lawn</i>	Measurable goals for the 2003 General Permit have been met.

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Revised				<p><i>Care Workshop</i> on June 7, 2011 at the Leominster Public Library.</p> <p>On October 19, 2015, the Massachusetts Watershed Coalition and Ecological Landscape Alliance hosted a “eco-tour” of Leominster raingardens and other stormwater management facilities. Attendees had the opportunity to learn about raingarden function, installation and integration into landscape. Maps of the walking tour are found here</p> <p>http://www.ecolandscaping.org/wp-content/uploads/2015/05/MB-BMP-sites-walking-tour-map-081815.jpg</p>	The City will consider hosting additional free workshops related to stormwater and nonpoint source pollution.
1.3	Stormwater Curriculum for grades 5 & 6	Conservation & School Dept.	No measurable goals planned for Permit Year 13	Fall Brook Elementary School students, working with the Massachusetts Watershed Coalition, installed a rain garden at the school in May 2009. The City continues to provide support and guidance to the Fall Brook Rain Garden Project.	Measurable goals for the 2003 General Permit have been met.
Revised			<p>The City collaborates 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>		
	Stormwater Runoff Public Service Announcements	Conservation & DPW	Reach as many households as possible	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</i>	Measurable goals for the 2003 General Permit have been met.

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Revised				<p>Home 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>	The City plans to air EPA’s DVD again in Permit Year 14.
Revised	Pet Waste PSA and Brochure	Conservation & DPW	Reach local residents	<p>In previous permit years, a Pet Waste brochure was provided to all licensed dog owners. The City continued to distribute the brochure during Permit Year 13.</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>	Measurable goals for the 2003 General Permit have been met. 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>The Leominster Conservation Commission hosts a webpage for homeowners about raingardens. http://www.leominster-ma.gov/gov/boardcomm/conservation/involve/rain.asp</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 continues to be updated.</p>

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Revised				<p>This webpage also has a link to Citywide stormwater management facilities.</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>	

2. Public Involvement and Participation

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 13 (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, and Health Departments.	Measurable goals for the 2003 General Permit have been met.
Revised				The committee meets on an as needed basis. The Stormwater Advisory Committee will continue to communicate and meet as needed to discuss stormwater management activities, preparation for the reissued MS4 General Permit and conducted a Stormwater Management/MS4 Program training refresher in 2015.	
2.2	Public Meetings on SWMP	SW Advisory Committee	Host annual public meetings each fall, beginning November 2005	During Permit Year 13, 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.	Measurable goals for the 2003 General Permit have been met. The Stormwater Advisory Committee plans to solicit public comment during development of a new Notice of Intent and Stormwater Management Plan. for the following permit year.
Revised					

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 13 (Reliance on non-municipal partners indicated, if any)	Planned Activities
2.3	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 annual City-wide City Pride Cleanup Day took place on May 2, 2015.	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> .
Revised					
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 2015.	Measurable goals for the 2003 General Permit have been met. The City will consider additional storm drain stenciling in 2016 as resources allow.
Revised					
2.5	HHW and Electronics Collection Events	Public Works	Host 4 annual HHW collection events	Measurable goal met. In Permit Year 13, continues to hold Hazardous Waste and Electronics collection events for citizens of Leominster. The HHW days occurred on March 21, 2015, June 20, 2015, August 22, 2015, and November 21, 2015. The City holds a Spring and Fall Recycling Event, collecting items such as electronics, motor oil, and drugs. The Health Department has collection boxes for used syringes, batteries and ink cartridges. A new drug and battery disposal kiosk has been placed in the Police Department for public use.	Continue to provide information on proper disposal of all rubbish to discourage illegal dumping.

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Revised				<p>Drug Take Back Day was held on September 26, 2015.</p> <p>The City conducted fall leaf and yard waste pickup for City residents between the dates of April 6 – May 30 and Oct. 5 – Nov. 28.</p> <p>The City provides detailed information on the Health Department’s web page (http://www.leominster-ma.gov/depts/safety/health/recycle/curbside/waste.asp) 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 13 (Reliance on non-municipal partners indicated, if any)	Planned Activities
3.1	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. The City continues to document which outfalls are City-owned. So far, a total of 312 outfalls were identified as City-owned and in the urbanized area. Pipe	Measurable goals for the 2003 General Permit have been met.

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Revised				<p>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>Priority catchments were identified in PY13 related to potential risk for illicit discharges. This preliminary prioritization was a part of the refinement of the written IDDE Program Manual.</p> <p>Additionally, the City has begun to map and track city-owned stormwater control systems. See weblink here: https://www.google.com/maps/d/viewer?mid=zsMHR76jcDAA.k0ubdw_H-xEQ</p> <p>MassDOT performed an Impaired Waters Assessment for Monoosnoc Brook in 2015.</p>	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 Brook) in wet and dry weather.	The City will refine an Outfall Monitoring Program according

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Revised				<p>Opportunistic visual inspections are done during catch basin cleaning. Employees are trained on opportunistic inspections for illicit cross-connections.</p> <p>In Permit Year 13, the City’s current IDDE program was reviewed, refined and updated into a written Program Manual. The Program Manual outlines regulatory authority, screening, investigation and elimination workflow processes and identifies priority catchments. A key component of Leominster’s IDDE program, is the use of opportunistic inspections as a method to identify illicit discharges. A SOP for opportunistic inspections was refined and developed as a part of the development of the IDDE Program Manual. On December 3, 2015, 45 City of Leominster employees were introduced to the City IDDE Program and trained on the fundamentals of illicit discharges, how to identify an illicit discharge, and the SOP for opportunistic inspections.</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>	to EPA’s requirements.
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 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.
Revised					

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 13 (Reliance on non-municipal partners indicated, if any)	Planned Activities
3.4	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 or other illicit discharges to the Director of Public Works and tracks potential illegal dumping on the catch basin cleaning form.	Measurable goals for the 2003 General Permit have been met.
Revised					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 13 (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 which went into effect on 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				In 2015, there were 6 stormwater permit application reviews conducted under the new stormwater management permit application.	
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 conduct inspections of ongoing construction projects throughout the City.	Measurable goals for the 2003 General Permit have been met.
Revised					Continue construction site inspections by City personnel.

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 13 (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	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.	Measurable goals for the 2003 General Permit have been met.
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 13 (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. The Stormwater Committee provided outreach to businesses about the new ordinance in late fall 2014. The ordinance went into effect on January 1, 2015.	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 13 (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 were trained on MS4 compliance and basic stormwater practices on April 17, 2015.	Measurable goals for the 2003 General Permit have been met.
Revised				<p>City staff were introduced to Leominster's updated IDDE Program Manual and Standard Operating Procedures for opportunistic inspections.</p> <p>Staff from the Stormwater Committee continues to receive hands-on training from the Massachusetts Watershed Coalition through training and public presentations.</p>	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.	<p>The City currently sweeps streets twice per year and three times per week downtown.</p> <p>The city currently has a total of three street sweepers.</p>	<p>Measurable goals for the 2003 General Permit have been met.</p> <p>Continue the annual street sweeping program.</p>
Revised					
6.3	Predictive catch basin cleaning program	Public Works	Clean all basins once per year (3600). Total costs per year.	The City cleaned 7,020 catch basins in Permit Year 13 and removed approximately 2,886 tons of material	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 13 (Reliance on non-municipal partners indicated, if any)	Planned Activities
Revised				<p>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.</p> <p>The City has a cooperative agreement with Clinton, MA for permitted disposal of catch basin residuals.</p>	<p>The City will consider prioritization of the cleaning schedule to reach outfall areas and other sensitive areas first during development of the updated SWMP.</p>
6.4	O&M Schedule for City owned structural BMPs	Engineering	Implement program by Spring '05	<p>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 222 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 private BMPs were developed for compliance with local permits. The City pays for third party operation and maintenance of municipally owned BMPs.</p>	<p>Measurable goals for the 2003 General Permit have been met with refinements to GIS ownership attributing and maintenance program schedules.</p> <p>The City plans to formalize their O&M procedures for City-owned properties and infrastructure according to EPA's requirements.</p>

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 13 (Reliance on non-municipal partners indicated, if any)	Planned Activities
6.5	Vehicle Washing: separate garage floor drains	Public Works	Tie garage drains into sanitary sewer	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.	BMP complete. Measurable goals for the 2003 General Permit have been met.
Revised					
6.6	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.
Revised					
6.7	Repair leaking sewer trunk lines	Public Works	Relined leaking sewer trunk line – Granite Street	Several sewer line repairs and pipe relining efforts were conducted in 2015. The City re-lined approximately 14,000 feet of sewer pipe in 2015. The City spent \$1.1 million in total sewer repairs in PY13.	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 13 (Reliance on non-municipal partners indicated, if any)	Planned Activities
7.1	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. The City will determine appropriate BMPs given the pollutants of concern and targeted land uses and activities in impaired watersheds.
Revised					
7.2	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.
Revised					
7.3	Street Sweeping Summer/Fall 2007	Public Works	Increase sweeping to 3-4 times/yr. in watershed areas.	BMP complete. See BMP 6.2.	The City plans to prioritize the sweeping schedule to reach watershed areas and other sensitive areas first.
Revised					

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 under the revised General Permit and will consider adding BMPs to address pollutants of concern during development of the next NOI.