# **Year 1 Annual Report**

# Massachusetts Small MS4 General Permit Reporting Period: May 1, 2018-June 30, 2019

\*\*Please DO NOT attach any documents to this form. Instead, attach all requested documents to an email when submitting the form\*\*

Unless otherwise noted, all fields are required to be filled out. If a field is left blank, it will be assumed the requirement or task has not been completed.

### **Part I: Contact Information**

Name of Municipality or Organization: City of Lawrence	be e
EPA NPDES Permit Number: MAR041201	
Primary MS4 Program Manager Contact Information	on
Name: Brian Pena	Title: Interim DPW Director
Street Address Line 1: 200 Common Street	
Street Address Line 2: na	
City: Lawrence State: MA	Zip Code: 01840
Email: bpena@cityoflawrence.com	Phone Number: (978) 620-3110
Fax Number: na	
Stormwater Management Program (SWMP) Inform	ation
SWMP Location (web address): http://www.cityoflawr	ence.com/321/Water-Sewer-Department
Date SWMP was Last Updated: Sep 7, 2018	
If the SWMP is not available on the web please provide not posted on the web:	e the physical address and an explanation of why it is
na	

## Part II: Self Assessment

First, in the box below, select the impairment(s) and/or TMDL(s) that are applicable to your MS4.

	-	1 /	. ,	•
Impairment(	<u>(s)</u>			
	<ul><li>☑ Bacteria/Pathogens</li><li>☑ Solids/ Oil/ Grease (Hy</li></ul>	☐ Chloride //drocarbons)/ Metal	☐ Nitrogen	
TMDL(s)				
In State:	☐ Assabet River Phospho☐ Charles River Watersh		eria and Pathogen  ☐ Lake and Pond	☐ Cape Cod Nitrogen Phosphorus
Out of State:	☐ Bacteria/Pathogens	☐ Metals	□ Nitrogen	☐ Phosphorus
			Cl	ear Impairments and TMDLs
<b>you have com</b> unchecked. Ad	<b>ipleted that permit requiren</b> dditional information will b	<b>nent fully.</b> If you ha	ave not completed a re	ch box you are certifying that equirement leave the box
Year 1 Requir	rements			
⊠ Develo	op and begin public education	on and outreach pro	gram	
⊠ Identif last 5 y	ly and develop inventory of years	all known locations	s where SSOs have di	scharged to the MS4 in the
	• The SSO inventory is a	attached to the emai	il submission	
	○ The SSO inventory can	n be found at the fol	llowing website:	
⊠ Develo	op written IDDE plan includ	ling a procedure for	screening and sampl	ing outfalls
⊠ IDDE	ordinance complete			
☐ Identife priority	y each outfall and interconry rank each catchment for in	nection discharging investigation	from MS4, classify in	nto the relevant category, and
	<ul><li>The priority ranking of</li><li>The priority ranking of</li></ul>			the email submission the following website:
	Refer to consent decre annual compliance rep			MA. Most recent semi-
⊠ Constr	ruction/ Erosion and Sedime	ent Control (ESC) of	rdinance complete	
⊠ Develo	op written procedures for sit	te inspections and en	nforcement of sedime	ent and erosion control
⊠ Develo	op written procedures for sit	e plan review		
⊠ Keep a	a log of catch basins cleaned	l or inspected		
☐ Compl	lete inspection of all stormw	vater treatment struc	etures	

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□ Comply with State Public Notice requirements
⊠ Keep records relating to the permit available for 5 years and make available to the public
Properly store and dispose of catch basin cleanings and street sweepings so they do not discharge to receiving waters
□ Annual training to employees involved in IDDE program
□ All curbed roadways have been swept a minimum of one time per year
Bacteria/ Pathogens (Combination of Impaired Waters Requirements and TMDL Requirements as Applicab
Annual Requirements
Public Education and Outreach*
Annual message encouraging the proper management of pet waste, including noting any existing ordinances where appropriate
Permittee or its agents disseminate educational material to dog owners at the time of issuance or renewal of dog license, or other appropriate time
Provide information to owners of septic systems about proper maintenance in any catchment that discharges to a water body impaired for bacteria
* Public education messages can be combined with other public education requirements as applicable (see Appendix $H$ and $F$ for more information)
Phosphorus (Combination of Impaired Waters Requirements and TMDL Requirements as Applicable)
Annual Requirements
Public Education and Outreach*
Distribute an annual message in the spring (April/May) that encourages the proper use and disposal of grass clippings and encourages the proper use of slow-release and phosphorus-free fertilizers
Distribute an annual message in the summer (June/July) encouraging the proper management of pet waste, including noting any existing ordinances where appropriate
Distribute an annual message in the fall (August/September/October) encouraging the proper disposal of leaf litter
* Public education messages can be combined with other public education requirements as applicable (see Appendix H and F for more information)
Good Housekeeping and Pollution Prevention for Permittee Owned Operations
Increase street sweeping frequency of all municipal owned streets and parking lots subject to Permit part 2.3.7.a.iii.(c) to a minimum of two times per year (spring and fall)
Potential structural BMPs
Any structural BMPs listed in Attachment 3 to Appendix F already existing or installed in the regulate area by the permittee or its agents shall be tracked and the permittee shall estimate the phosphorus removal by the BMP consistent with Attachment 1 to Appendix H. Document the BMP type, total area treated by the BMP, the design storage volume of the BMP and the estimated phosphorus removed in
mass per year by the BMP in each each annual report

Good Housekeeping and Pollution Prevention for Permittee Owned Operations

Increase street sweeping frequency of all municipal owned streets and parking lots to a schedule to target areas with potential for high pollutant loads

Prioritize inspection and maintenance for catch basins to ensure that no sump shall be more than 50

percent full; Clean catch basins more frequently if inspection and maintenance activities indicate excessive sediment or debris loadings

Use the box below to input additional details on any unchecked boxes above or any additional information you would like to share as part of your self assessment:

Consistent with permit requirement 2.3.4.5, City of Lawrence is currently undertaking updates to its MS4 map to comprehensively include municipally owned and operated stormwater treatment structures. We anticipate all stormwater treatment structures will be mapped consistent with 2.3.4.5 by the end of Permit Year 2. Additionally, an inspection program will be developed in Permit Year 2 consistent with permit requirement 2.3.7.a.

In regards to annual requirements pertaining to Bacteria/Pathogen impairments, there are no known septic systems within the City of Lawrence and therefore providing information to owners of septic systems about proper maintenance is not applicable.

# Part III: Receiving Waters/Impaired Waters/TMDL

Have you made any changes to your lists of receiving waters, outfalls, or impairments since the NOI was submitted?
Yes □ No ⊠
If yes, describe below, including any relevant impairments or TMDLs:

# **Part IV: Minimum Control Measures**

Please fill out all of the metrics below. If applicable, include in the description who completed the task if completed by a third party.

# MCM1: Public Education

Number of educational messages completed during the reporting period: 5
Below, report on the educational messages completed during the first year. For the measurable goal(s) please describe the method/measures used to assess the overall effectiveness of the educational program.
BMP:1.2 Deliver Targeted Educational Messages
Message Description and Distribution Method:
The City of Lawrence, in its 2019 Consumer Confidence Report (CCR), included educational information regarding water resource protection topics such as SSOs, water conservation, and FOG control. Additional information pertaining to stormwater pollution and prevention was included. The Consumer Confidence Report was made available on the City's website in June of 2019.
Targeted Audience: Businesses/institutions/commercial facilities; developers; industrial facilities & residents.
Responsible Department/Parties: DPW Operations
Measurable Goal(s):
Annually include stormwater information in the CCR.
Message Date(s): June 2019
Message Completed for: Appendix F Requirements   Appendix H Requirements
Was this message different than what was proposed in your NOI? Yes ☐ No ☒
If yes, describe why the change was made:
BMP:1.3 Supplemental Educational Messages
Message Description and Distribution Method:
A clean water ad with information on ways to minimize stormwater runoff pollution from outdoor activities
such as fertilizing lawns and washing vehicles was posted by the Lawrence Department of Public Works to the
community Facebook page.
Targeted Audience: Residents
Responsible Department/Parties: DPW Operations
Measurable Goal(s):
For areas that discharge to waterbodies with a Total Phosphorus impairment, distribute one educational

message in August/September/October time-frame of each PY that pertains to proper disposal of leaf litter.

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Message Date(s): Ads have been developed and will be posted.	
Message Completed for: Appendix F Requirements ☐ Appendix H Requirements ⊠	
Was this message different than what was proposed in your NOI? Yes ☐ No ☒	
If yes, describe why the change was made:	
na	
BMP:1.2 Deliver Targeted Educational Messages	
Message Description and Distribution Method:	
Brochures for construction contractors with information regarding building permitting procedures and City erosion and sediment control standards.	
Targeted Audience: Developers (construction)	
Responsible Department/Parties: Building Permitting and Enforcement	
Measurable Goal(s):	
Distribute a minimum of one educational message to each of the four target audiences (residents, commerci construction, industrial.	al,
Message Date(s): Brochures have been developed and will be distributed.	
Message Completed for: Appendix F Requirements ☐ Appendix H Requirements ☐	
Was this message different than what was proposed in your NOI? Yes ☐ No ☒	
If yes, describe why the change was made:	
Add an Educational Message	
MCM2: Public Participation	
Describe the opportunity provided for public involvement in the development of the Stormwater Managemeter Program (SWMP) during the reporting period:	ent
During a public meeting of the City of Lawrence's Conservation Commission on April 16, 2019, a presentation was given overviewing the City's MS4 Permit and Stormwater Management Plan.	

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Was this opportunity different than what was proposed in your NOI? Yes $\square$ No $\boxtimes$
Describe any other public involvement or participation opportunities conducted during the reporting period:
MCM3: Illicit Discharge Detection and Elimination (IDDE)
Sanitary Sewer Overflows (SSOs)
Below, report on the number of SSOs identified in the MS4 system and removed during this reporting period.
Number of SSOs identified: 5
Number of SSOs removed: 5
Below, report on the total number of SSOs identified in the MS4 system and removed to date. At a minimum, report SSOs identified since 2013.
Total number of SSOs identified: 75
Total number of SSOs removed: 75
MS4 System Mapping
Describe the status of your MS4 map, including any progress made during the reporting period:
City of Lawrence MS4 map is annually updated. Refer to consent decree DJ#90-5-1-1-10166 City of Lawrence, MA. Most recent semi-annual compliance report dated 6/30/2019.
Edwichee, With Wost recent sein annual compliance report dated 0/30/2019.
Screening of Outfalls/Interconnections
If conducted, please submit any outfall monitoring results from this reporting period. Outfall monitoring
results should include the date, outfall/interconnection identifier, location, weather conditions at time of sampling, precipitation in previous 48 hours, field screening parameter results, and results from all analyses.
<ul> <li>The outfall screening data is attached to the email submission</li> </ul>
• The outfall screening data can be found at the following website:
Refer to consent decree DJ#90-5-1-1-10166 City of Lawrence, MA. Most recent semi-annual compliance report dated 6/30/2019.
Below, report on the number of outfalls/interconnections screened during this reporting period.
Number of outfalls screened:
Trainion of outfull betweenous

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Below, report on the percent of total outfalls/interconnections screened to date.	
Percent of total outfalls screened:	
Catchment Investigations  If conducted, please submit all data collected during this reporting period as part of the dry and wet weather investigations. Also include the presence or absence of System Vulnerability Factors for each catchment.  ○ The catchment investigation data is attached to the email submission  ● The catchment investigation data can be found at the following website:	r
Refer to consent decree DJ#90-5-1-1-10166 City of Lawrence, MA. Most recent semi-annual compliance report dated 6/30/2019.	
Below, report on the number of catchment investigations completed during this reporting period.  Number of catchment investigations completed this reporting period:  Below, report on the percent of catchments investigated to date.	
Percent of total catchments investigated:	
Optional: Provide any additional information for clarity regarding the catchment investigations below:	
<b>IDDE Progress</b> If illicit discharges were found, please submit a document describing work conducted over this reporting period, and cumulative to date, including location source; description of the discharge; method of discovery, date of discovery; and date of elimination, mitigation, or enforcement OR planned corrective measures and schedule of removal.	;
<ul> <li>The illicit discharge removal report is attached to the email submission</li> <li>The illicit discharge removal report can be found at the following website:</li> </ul>	
Refer to consent decree DJ#90-5-1-1-10166 City of Lawrence, MA. Most recent semi-annual compliance report dated 6/30/2019.	
Below, report on the number of illicit discharges identified and removed, along with the volume of sewage removed during this reporting period.	
Number of illicit discharges identified:	
Number of illicit discharges removed:	
Estimated volume of sewage removed:	
Below, report on the total number of illicit discharges identified and removed to date. At a minimum, report the number of illicit discharges identified and removed since the effective date of the permit.	on
Total number of illicit discharges identified:	

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Total number of illicit discharges removed:	
Optional: Provide any additional information for clarity regarding planned to be removed below:	illicit discharges identified, removed, or
<b>Employee Training</b>	
Describe the frequency and type of employee training conducted du	uring the reporting period:
Aggressive IDDE program underway. Ongoing employee training a consent decree DJ#90-5-1-1-10166 City of Lawrence, MA. Most re 6/30/2019.	
MCM4: Construction Site Stormwat  Below, report on the construction site plan reviews, inspections, and reporting period.	
Number of site plan reviews completed: 6	
Number of inspections completed: 7	
Number of enforcement actions taken: 0	
MCM5: Post-Construction Stormwater Manager Redevelopment	nent in New Development and
Ordinance Development	
Describe the status of the post-construction ordinance required to b	e complete in year 2 of the permit term:
Ordinance to be considered for refinement in Permit Year 2.	
As-built Drawings	
Describe the status of the measures the MS4 has utilized to require ensure long term operation and maintenance of completed construct of the permit term:	
As-built currently required in City of Lawrence stormwater manage	ement ordinance.

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Street Design and Parking Lots Report	
Describe the status of the street design and parking lots assessment due in yearny planned or completed changes to local regulations and guidelines:	ar 4 of the permit term, including
To be conducted in future permit years.	
Green Infrastructure Report	
Describe the status of the green infrastructure report due in year 4 of the peri and progress towards making the practice allowable:	mit term, including the findings
To be conducted in future permit years.	
Describe the status of the inventory, due in year 4 of the permit term, of permodified or retrofitted with BMPs to mitigate impervious areas and report modified or retrofitted:  To be conducted in future permit years.	
MCM6: Good Housekeeping	
Catch Basin Cleaning	
Describe the status of the catch basin cleaning optimization plan:	
The City of Lawrence intends to refine catch basin cleaning optimization pla	n in Permit Year 2.
If complete, attach the catch basin cleaning optimization plan or the schedule the optimization plan:	
<ul> <li>The catch basin cleaning optimization plan or schedule is</li> </ul>	
The catch basin cleaning optimization plan or schedule can website:	n be found at the following

To be developed in Permit Year 2.

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Below, report on the number of catch basins inspected and cremoved from the catch basins during this reporting period.	cleaned, along with the total vo	lume of material
Number of catch basins inspected: 1649		
Number of catch basins cleaned: 1649		
Total volume or mass of material removed for	rom all catch basins: 350.58	CY
Below, report on the total number of catch basins in the MS	4 system, if known.	
Total number of catch basins: 4604		
If applicable:		
Report on the actions taken if a catch basin sump is more the inspections/cleaning events:	an 50% full during two consecu	utive routine
Catch basin is cleaned. Consistent with permit requirement Year 2.	2.3.7.a, optimization plan to be	refined in Permit
Street Sweeping		
Describe the status of the written procedures for sweeping s	<del>_</del>	
Consistent with permit requirement 2.3.7.a, the City of Law sweeping streets and municipally-owned lots in Permit Year	-	procedures for
Report on street sweeping completed during the reporting p	eriod using one of the three me	trics below.
Number of miles cleaned: 31		
O Volume of material removed:		
O Weight of material removed:	[UNITS]	
If applicable:		
For rural uncurbed roadways with no catch basins, describe	the progress of the inspection,	documentation, and

targeted sweeping plan:

Consistent with permit requirement 2.3.7.a, the City of Lawrence intends to refine written procedures for sweeping streets and municipally-owned lots in Permit Year 2.

### **Winter Road Maintenance**

Describe the status of the written procedures for winter road maintenance including the storage of salt and sand:

Consistent with permit requirement 2.3.7.a, the City of Lawrence intends to refine written procedures for winter road maintenance in Permit Year 2.

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Inventory of Permittee-Owned Properties	
Describe the status of the inventory, due in year 2 of the permit term, of permittee-owned proper parks and open spaces, buildings and facilities, and vehicles and equipment, and include any up	_
Consistent with permit requirement 2.3.7.a, the City of Lawrence intends to develop an inventor permittee-owned properties such as parks and open spaces, buildings and facilities, and vehicle equipment in Permit Year 2.	•
O&M Procedures for Parks and Open Spaces, Buildings and Facilities, and Vehicles and	<u>Equipment</u>
Describe the status of the operation and maintenance procedures, due in year 2 of the permit terpermittee-owned properties (parks and open spaces, buildings and facilities, vehicles and equip include maintenance activities associated with each:	
Consistent with permit requirement 2.3.7.a, the City of Lawrence intends to refine operation an procedures for permittee-owned properties such as parks and open spaces, buildings and facility vehicles and equipment in Permit Year 2.	
Stormwater Pollution Prevention Plan (SWPPP)	
Describe the status of any SWPPP, due in year 2 of the permit term, for permittee-owned or op including maintenance garages, public works yards, transfer stations, and other waste handling pollutants are exposed to stormwater:	
Consistent with permit requirement 2.3.7.b, the City of Lawrence intends to develop SWPPP for works yard.	or its public
Below, report on the number of site inspections for facilities that require a SWPPP completed a reporting period.	luring this
Number of site inspections completed: TBD	
Describe any corrective actions taken at a facility with a SWPPP:  TBD	
O&M Procedures for Stormwater Treatment Structures	
Describe the status of the written procedure for stormwater treatment structure maintenance:	
Consistent with permit requirement 2.3.7.a, the City of Lawrence intends to develop written op maintenance procedures for stormwater treatment structures in Permit Year 2.	eration and

#### **Additional Information**

### **Monitoring or Study Results**

Results from any other stormwater or receiving water quality monitoring or studies conducted during the reporting period not otherwise mentioned above, where the data is being used to inform permit compliance or permit effectiveness must be attached.

permit effectiv	veness must be attached.				
	<ul> <li>Not applicable</li> <li>The results from additional reports or studies are attached to the email submission</li> <li>The results from additional reports or studies can be found at the following website(s):</li> </ul>				
	Refer to consent decree DJ#90-5-1-1-10166 City of Lawrence, MA. Most recent semi-annual compliance report dated 6/30/2019.				
	oring or studies were conducted on your behalf or if monitoring or studies conducted by other reported to you, a brief description of the type of information gathered or received shall be ow:				

#### **Additional Information**

*Optional:* Enter any additional information relevant to your stormwater management program implementation during the reporting period. Include any BMP modifications made by the MS4 if not already discussed above:

In verbal and written communication with EPA, it is our understanding that the City of Lawrence can continue to report on IDDE program activities under consent decree DJ#90-5-1-1-10166 semi-annual reporting as opposed to duplicative reporting under the MS4 General Permit Annual Report. For any blank cells regarding numbers or activities associated with IDDE control measure in this report, please refer to the most recent consent decree semi-annual report dated, 6/30/2019. The City of Lawrence anticipates continuing to report on IDDE program progress under the consent decree, until such time as the decree provisions no longer apply.

### **Activities Planned for Next Reporting Period**

Please confirm that your SWMP has been, or will be, updated to comply with all applicable permit requirements including but not limited to the year 2 requirements summarized below. (Note: impaired waters and TMDL requirements are not listed below)

Yes, I agree ⊠

- Complete system mapping Phase I
- Begin investigations of catchments associated with Problem Outfalls
- Develop or modify an ordinance or other regulatory mechanism for post-construction stormwater runoff from new development and redevelopment
- Establish and implement written procedures to require the submission of as-built drawings no later than two years after the completion of construction projects
- Develop, if not already developed, written operations and maintenance procedures

• Develop an inventory of all permittee owned facilities in the categories of parks and open space, buildings and facilities, and vehicles and equipment; review annually and update as necessary

- Establish a written program detailing the activities and procedures the permittee will implement so that the MS4 infrastructure is maintained in a timely manner
- Develop and implement a written SWPPP for maintenance garages, public works yards, transfer stations, and other waste handling facilities where pollutants are exposed to stormwater
- Enclose or cover storage piles of salt or piles containing salt used for deicing or other purposes
- Develop, if not already developed, written procedures for sweeping streets and municipal-owned lots
- Develop, if not already developed, written procedures for winter road maintenance including storage of salt and sand
- Develop, if not already developed, a schedule for catch basin cleaning
- Develop, if not already developed, a written procedure for stormwater treatment structure maintenance
- Develop a written catchment investigation procedure (18 months)

#### **Annual Requirements**

- Annual report submitted and available to the public
- Annual opportunity for public participation in review and implementation of SWMP
- Keep records relating to the permit available for 5 years and make available to the public
- Properly store and dispose of catch basin cleanings and street sweepings so they do not discharge to receiving waters
- Annual training to employees involved in IDDE program
- Update inventory of all known locations where SSOs have discharged to the MS4 in the last 5 years
- Continue public education and outreach program
- Update outfall and interconnection inventory and priority ranking and include data collected in connection with the dry weather screening and other relevant inspections conducted
- Implement IDDE program
- Review site plans of construction sites as part of the construction stormwater runoff control program
- Conduct site inspection of construction sites as necessary
- Inspect and maintain stormwater treatment structures
- Log catch basins cleaned or inspected
- Sweep all uncurbed streets at least annually

Provide any additional details on activities planned for permit year 2 below:										

## Part V: Certification of Small MS4 Annual Report 2019

### 40 CFR 144.32(d) 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, I certify that 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:	Daniel Rivera	Title:	Mayor	
Signature	[Signatory may be a duly authorized representative]	Date:	9/25/19	