

Year 2 Annual Report
Massachusetts Small MS4 General Permit
Reporting Period: July 1, 2019-June 30, 2020

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. Please ONLY report on activities between July 1, 2019 and June 30, 2020 unless otherwise requested.

Part I: Contact Information

Name of Municipality or Organization:

EPA NPDES Permit Number:

Primary MS4 Program Manager Contact Information

Name: Title:

Street Address Line 1:

Street Address Line 2:

City: State: Zip Code:

Email: Phone Number:

Stormwater Management Program (SWMP) Information

SWMP Location (web address):

Date SWMP was Last Updated:

If the SWMP is not available on the web please provide the physical address:

Part II: Self-Assessment

First, in the box below, select the impairment(s) and/or TMDL(s) that are applicable to your MS4. Make sure you are referring to the most recent EPA approved Section 303(d) Impaired Waters List which can be found here: <https://www.epa.gov/tmdl/region-1-impaired-waters-and-303d-lists-state>

Impairment(s)

Bacteria/Pathogens
 Chloride
 Nitrogen
 Phosphorus
 Solids/ Oil/ Grease (Hydrocarbons)/ Metals

TMDL(s)

In State:
 Assabet River Phosphorus
 Bacteria and Pathogen
 Cape Cod Nitrogen
 Charles River Watershed Phosphorus
 Lake and Pond Phosphorus

Out of State:
 Bacteria/Pathogens
 Metals
 Nitrogen
 Phosphorus

Clear Impairments and TMDLs

Next, check off all requirements below that have been completed. **By checking each box you are certifying that you have completed that permit requirement fully.** If you have not completed a requirement leave the box unchecked. Additional information will be requested in later sections.

Year 2 Requirements

- Completed Phase I of system mapping
- Developed a written catchment investigation procedure and added the procedure to the SWMP
- Developed written procedures to require the submission of as-built drawings and ensure the long term operation and maintenance of completed construction sites and added these procedures to the SWMP
- Enclosed or covered storage piles of salt or piles containing salt used for deicing or other purposes
- Developed written operations and maintenance procedures for parks and open space, buildings and facilities, and vehicles and equipment and added these procedures to the SWMP
- Developed an inventory of all permittee owned facilities in the categories of parks and open space, buildings and facilities, and vehicles and equipment and added this inventory to the SWMP
- Completed a written program for MS4 infrastructure maintenance to reduce the discharge of pollutants
- Developed written SWPPPs, included in the SWMP, for all of the following permittee owned or operated facilities: maintenance garages, public works yards, transfer stations, and other waste handling facilities where pollutants are exposed to stormwater

Optional: If you would like to describe progress made on any incomplete requirements listed above, provide any additional information, and/or if any of the above year 2 requirements could not be completed due to the impacts of COVID-19, please identify the requirement that could not be completed, any actions taken to attempt to complete the requirement, and reason the requirement could not be completed below:

Annual Requirements

- Provided an opportunity for public participation in review and implementation of SWMP and complied with State Public Notice requirements
- Kept records relating to the permit available for 5 years and made available to the public
- The SSO inventory has been updated, including the status of mitigation and corrective measures implemented
 - This is not applicable because we do not have sanitary sewer
 - This is not applicable because we did not find any new SSOs
 - The updated SSO inventory is attached to the email submission
 - The updated SSO inventory can be found at the following website:
- Properly stored and disposed of catch basin cleanings and street sweepings so they did not discharge to receiving waters
- Provided training to employees involved in IDDE program within the reporting period
- All curbed roadways were swept at least once within the reporting period
- Updated outfall and interconnection inventory and priority ranking as needed

Optional: If you would like to describe progress made on any incomplete requirements listed above, provide any additional information, and/or if any of the above annual requirements could not be completed due to the impacts of COVID-19, please identify the requirement that could not be completed, any actions taken to attempt to complete the requirement, and reason the requirement could not be completed below:

Bacteria/ Pathogens (Combination of Impaired Waters Requirements and TMDL Requirements as Applicable)

Annual Requirements

*Public Education and Outreach**

- Annual message was distributed encouraging the proper management of pet waste, including noting any existing ordinances where appropriate
- Permittee or its agents disseminated educational material to dog owners at the time of issuance or renewal of dog license, or other appropriate time
- Provided 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)*

Optional: If you would like to describe progress made on any incomplete requirements listed above or provide any additional details, please use the box below:

Phosphorus (Combination of Impaired Waters Requirements and TMDL Requirements as Applicable)

Annual Requirements

*Public Education and Outreach**

- Distributed an annual message in the spring (April/May) encouraging the proper use and disposal of grass clippings and encouraging the proper use of slow-release and phosphorus-free fertilizers
- Distributed an annual message in the summer (June/July) encouraging the proper management of pet waste, including noting any existing ordinances where appropriate
- Distributed 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

- Increased 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 already existing or installed in the regulated area by the permittee or its agents was tracked and the phosphorus removal by the BMP was estimated consistent with Attachment 3 to Appendix F. 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 were documented.

- The BMP information is attached to the email submission
- The BMP information can be found at the following website:

Optional: If you would like to describe progress made on any incomplete requirements listed above or provide any additional details, please use the box below:

Optional: Use the box below to provide any additional information you would like to share as part of your self-assessment:

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 this reporting period:**

Below, report on the educational messages completed **during this reporting period**. For the measurable goal(s) please describe the method/measures used to assess the overall effectiveness of the educational program.

BMP: Dog Waste and Surface Water Quality

Message Description and Distribution Method:

Immediately and properly remove and dispose of pet feces on public or private property using a bag or other container that is deposited in a trash receptacle and collected by a waste hauler.

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

To educate and remind the public about dog waste to minimize E. coli in runoff. Handouts are given out during dog licensing and information is posted on the City's website. 68 handouts were distributed in Permit Year 2.

Message Date(s):

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: Stormwater Runoff Information for Businesses

Message Description and Distribution Method:

How to manage business vehicles, general good housekeeping, building care, and landscaping. This brochure is given to all developers and posted on the City's website.

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

As outlined in the Notice of Intent, the measurable goal for this BMP was to ensure ongoing availability of educational information for businesses and institutions. 15 handouts were distributed this Permit Year.

Message Date(s): Pamphlet available year round

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:General Construction and Site Supervision Stormwater Tips

Message Description and Distribution Method:

The City makes the DCR pamphlet “General Construction and Site Supervision Stormwater Tips in the Wachusett Watershed” available on the City’s Stormwater & Water Pollution informational web page. This pamphlet overviews how to plan pollution prevention in advance of construction, BMPs to reduce pollutant discharges, and responsibilities as an owner, operator, or supervisor of a site. This pamphlet is available on the City’s website year-round, and developers are the targeted audience.

Targeted Audience: Developers (construction)

Responsible Department/Parties: Building Department, Conservation Department, and DPW

Measurable Goal(s):

As outlined in the Notice of Intent, the measurable goal for this BMP was to make these educational materials available on an ongoing basis. As these pamphlets are available online and in City offices year round, this measurable goal has been met. 18 pamphlets were distributed this permit year.

Message Date(s): available year round

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:Going Green with Stormwater: Rain Gardens

Message Description and Distribution Method:

Step-by-step instructions on how to create a rain garden, how to reduce runoff, improve water quality, and enhance your landscape. Available as a handout and also posted on the Town's website year round.

Targeted Audience: Residents

Responsible Department/Parties: DPW Operations

Measurable Goal(s):

As outlined in the Notice of Intent, the measurable goal for this BMP was to make these educational materials available on an ongoing basis. As these pamphlets are available online year round, this

measurable goal has been met.

Message Date(s): posted 6/9/2020, available year round

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:Stormwater Pollution Education: Fertilizing the Lawn

Message Description and Distribution Method:

A pamphlet that describes the means by which fertilizer becomes a pollutant, the harms of excess fertilizer, and tips to properly fertilize and keep water clean. The City of Leominster maintains a dedicated Stormwater & Water Pollution informational page on the City website.

Targeted Audience: Residents

Responsible Department/Parties: Conservation Office, Mayors Office

Measurable Goal(s):

Per the Notice of Intent, the measurable goal for this BMP was to deliver these messages seasonally. This goal has largely been met. 30 handouts were distributed this Permit Year.

Message Date(s): posted 6/9/2020, available year round on the website

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:Pet Waste, Lawn & Garden Care, Home/Business Best Practice, Car and Boat Washing, Auto Re

Message Description and Distribution Method:

This posting provides education on how to wash vehicles away from a storm drain, use organic soaps for vehicles, get your car washed professionally, collect used vehicle fluids and recycle them at service stations, and dechlorinate a pool with neutralizing chemical before discharging your pool water.

Targeted Audience: Residents

Responsible Department/Parties: Conservation Committee

Measurable Goal(s):

As outlined in the Notice of Intent, the measurable goal for this BMP was to make these educational materials available on an ongoing basis. As these pamphlets are available online and in City offices year round, this measurable goal has been met.

Message Date(s): posted 6/9/2020 and available on DPW's Facebook page year round

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:Dwayne the Storm Drain

Message Description and Distribution Method:

The MWRA coloring book "Dwayne the Storm Drain" was provided to students at Northwest Elementary School, was handed out throughout the Permit Year and is available in the Conservation and Mayor's offices. This coloring book helps children visualize how water and pollutants that go down storm drains ends up in waterways.

Targeted Audience: Residents/Youth

Responsible Department/Parties: Conservation Office, Mayors Office, City Hall

Measurable Goal(s):

90 coloring books were distributed in Permit Year 2.

Message Date(s): These coloring books are available year round.

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:Various Handouts/Brochures

Message Description and Distribution Method:

Various other handouts/brochures were handed out this Permit Year, including: the "Rain Check Book" to developers, "Stormwater Pollution and Prevention for Industrial Sites" to developers, "Stormwater and Industry" to businesses, "Stormwater Tips for the Business Community in the Watershed" to businesses, "Clear Culverts" to all 4 target audiences, and Pet Waste Brochures during dog licensing.

Targeted Audience: Businesses, institutions and commercial facilities, developers, residents, and industrial

Responsible Department/Parties: Various

Measurable Goal(s):

12 "Rain Check Book" handouts were distributed

47 "Stormwater Pollution and Prevention for Industrial Sites" handouts were distributed

28 "Stormwater and Industry" handouts were distributed
 18 "Stormwater Tips for the Business Community in the Watershed" handouts were distributed
 19 "Clear Culverts" handouts were distributed
 2,658 Pet Waste Brochures were distributed

Message Date(s): Throughout Permit Year 2

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 Management Program (SWMP) **during this reporting period:**

Per the measurable goal for BMP 2.2, the SWMP is posted online for public review.

Was this opportunity different than what was proposed in your NOI? Yes No

Describe any other public involvement or participation opportunities conducted **during this reporting period:**

Per the measurable goal for BMP 2.1, the City of Leominster typically allows the public to engage in the stormwater management program during two public events: Garden Mania and Earth Fest. Neither event was held this year due to the COVID-19 pandemic.

MCM3: Illicit Discharge Detection and Elimination (IDDE)

Sanitary Sewer Overflows (SSOs)

Check off the box below if the statement is true.

This SSO section is NOT applicable because we DO NOT have sanitary sewer

Below, report on the number of SSOs identified in the MS4 system and removed **during this reporting period.**

Number of SSOs identified:

Number of SSOs removed:

MS4 System Mapping

Below, check all that apply.

The following elements of the Phase I map have been completed:

- Outfalls and receiving waters
- Open channel conveyances
- Interconnections
- Municipally-owned stormwater treatment structures
- Waterbodies identified by name and indication of all use impairments
- Initial catchment delineations

Optional: Describe any additional progress you made on your map during this reporting period or provide additional status information regarding your map:

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.

- The outfall screening data is attached to the email submission
- The outfall screening data can be found at the following website:

Below, report on the number of outfalls/interconnections screened **during this reporting period.**

Number of 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:

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:

Catchment investigations to begin following Permit Year 3 outfall screening and reprioritization activities.

IDDE Progress

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.

- The illicit discharge removal report is attached to the email submission
- The illicit discharge removal report can be found at the following website:

*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: gallons/day

*Below, report on the total number of illicit discharges identified and removed to date. At a minimum, report on the number of illicit discharges identified and removed **since the effective date of the permit (July 1, 2018).***

Total number of illicit discharges identified:

Total number of illicit discharges removed:

Optional: Provide any additional information for clarity regarding illicit discharges identified, removed, or planned to be removed below:

To be conducted in future permit years upon verification of an illicit discharge.

Employee Training

Describe the frequency and type of employee training conducted **during the reporting period:**

The City of Leominster held several informal MS4/IDDE meetings and training sessions over the reporting period.

In July 2019, IDDE training was given to staff responsible for outfall screening and sampling. The training involved an overview of the City’s MS4 and IDDE program, as well as detailed instruction on outfall and manhole inspection and catchment investigation procedures.

During various OSHA check-ins and on-site meetings throughout the Permit Year, Department of Public Works staff members received informal trainings on ways to prevent stormwater pollution and illicit

discharges. Examples of the information provided in these meetings include: how to prevent hazardous waste spills from entering surface water or the MS4 system (and that waste entering the system is an illicit discharge), do not dump wash water from paint cans and buckets from line striping operations into catch basins, proper hazardous waste storage techniques, how to inspect equipment for damages to detect malfunctions that could lead to leaks early, etc.

MCM4: Construction Site Stormwater Runoff Control

*Below, report on the construction site plan reviews, inspections, and enforcement actions completed **during this reporting period.***

Number of site plan reviews completed:

Number of inspections completed:

Number of enforcement actions taken:

Optional: Enter any additional information relevant to construction site plan reviews, inspections, and enforcement actions:

The City of Leominster developed a new site plan review form to be completed before an applicant receives a building permit. The form must now be signed off by all City departments prior to issuance of any building permit. Previously, only the Building Department would review smaller projects under the threshold for traditional stormwater permits. This new process allows the Conservation Commission, Planning Department, and others to provide input on all projects regardless of size.

MCM5: Post-Construction Stormwater Management in New Development and Redevelopment

Ordinance or Regulatory Mechanism

Below, select the option that describes your ordinance or regulatory mechanism progress.

- Bylaw, ordinance, or regulations are updated and adopted consistent with permit requirements
- Bylaw, ordinance, or regulations are updated consistent with permit requirements but are not yet adopted
- Bylaw, ordinance, or regulations have not been updated or adopted

As-built Drawings

Describe the measures the MS4 has utilized to require the submission of as-built drawings and ensure long term operation and maintenance of completed construction sites:

The submission of as-builts and development of O&M plans and ongoing maintenance of post-construction stormwater controls are required by the City of Leominster's Stormwater and Erosion Control regulation.

Street Design and Parking Lots Report

Describe the status of the street design and parking lots assessment due in year 4 of the permit term, including any planned or completed changes to local regulations and guidelines:

To be developed in future permit years.

Green Infrastructure Report

Describe the status of the green infrastructure report due in year 4 of the permit term, including the findings and progress towards making the practice allowable:

To be developed in future permit years.

Retrofit Properties Inventory

Describe the status of the inventory, due in year 4 of the permit term, of permittee-owned properties that could be modified or retrofitted with BMPs to mitigate impervious areas and report on any properties that have been modified or retrofitted:

To be developed in future permit years.

MCM6: Good Housekeeping

Catch Basin Cleaning

*Below, report on the number of catch basins inspected and cleaned, along with the total volume of material removed from the catch basins **during this reporting period.***

Number of catch basins inspected:

Number of catch basins cleaned:

Total volume or mass of material removed from all catch basins:

Below, report on the total number of catch basins in the MS4 system.

Total number of catch basins:

If applicable:

Report on the actions taken if a catch basin sump is more than 50% full during two consecutive routine inspections/cleaning events:

If necessary, schedule adjustments will be made to prioritize catch basins located at known problem areas (low spots) and near construction activities (roadway construction, residential, commercial, or industrial development). If inspections and maintenance activities indicate excessive sediment and debris loading (i.e. the sump is more than 50% full during two consecutive routine inspections//cleanings), these catch basins will be marked for more frequent cleaning. Where necessary, street sweeping will be utilized to aid in minimizing catch basin sediment loading.

Street Sweeping

Report on street sweeping completed *during this reporting period* using one of the three metrics below.

- Number of miles cleaned:
- Volume of material removed: [Select Units]
- Weight of material removed:

O&M Procedures and Inventory of Permittee-Owned Properties

Below, check all that apply.

The following permittee-owned properties have been inventoried:

- Parks and open spaces
- Buildings and facilities
- Vehicles and equipment

The following O&M procedures for permittee-owned properties have been completed:

- Parks and open spaces
- Buildings and facilities
- Vehicles and equipment

Stormwater Pollution Prevention Plan (SWPPP)

*Below, report on the number of site inspections for facilities that require a SWPPP completed **during this reporting period.***

Number of site inspections completed:

Describe any corrective actions taken at a facility with a SWPPP:

The City of Leominster developed a SWPPP for their DPW facility in Permit Year 2 and will begin facility inspections during Permit Year 3.

Spill kits have been stationed in 3 easy access locations at the Department of Public Works facility.

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.

- Not applicable
- The results from additional reports or studies are attached to the email submission
- The results from additional reports or studies can be found at the following website(s):

If such monitoring or studies were conducted on your behalf or if monitoring or studies conducted by other entities were reported to you, a brief description of the type of information gathered or received shall be described below:

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:

COVID-19 Impacts

Optional: If any of the above year 2 requirements could not be completed due to the impacts of COVID-19, please identify the requirement that could not be completed, any actions taken to attempt to complete the requirement, and reason the requirement could not be completed below:

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 3 requirements summarized below. (Note: impaired waters and TMDL requirements are not listed below)

Yes, I agree

- Inspect all outfalls/ interconnections (excluding Problem and Excluded outfalls) for the presence of dry weather flow
- Complete follow-up ranking as dry weather screening becomes available

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
- 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
- Continue investigations of catchments associated with Problem Outfalls
- Review inventory of all permittee owned facilities in the categories of parks and open space, buildings and facilities, and vehicles and equipment; update if necessary

Provide any additional details on activities planned for permit year 3 below:

Part V: Certification of Small MS4 Annual Report 2020

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.

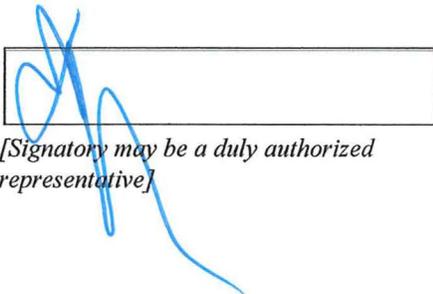
Name:

Dean J. Mazzarella

Title:

Mayor

Signature:



Date:

9/21/20

[Signatory may be a duly authorized representative]

Part V: Certification of Small MS4 Annual Report 2020

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:

Shawn Cemeau

Title:

Code Enforcer

Signature:

Shawn Cemeau

Date:

9-21-2020

[Signatory may be a duly authorized representative]