

Year 3 Annual Report

Massachusetts Small MS4 General Permit

Reporting Period: July 1, 2020-June 30, 2021

****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, 2020 and June 30, 2021 unless otherwise requested.

Part I: Contact Information

Name of Municipality or Organization: Town of Leicester

EPA NPDES Permit Number: MAR041202

Primary MS4 Program Manager Contact Information

Name: Dennis Griffin

Title: Highway Superintendent

Street Address Line 1: 59 Peter Salem Road

Street Address Line 2:

City: Leicester

State: MA

Zip Code: 01524

Email: Griffind@leicesterma.org

Phone Number: (508) 892-7021

Stormwater Management Program (SWMP) Information

SWMP Location (web address): <https://www.leicesterma.org/highway-department/pages/stormwater-information>

Date SWMP was Last Updated: Jun 30, 2021

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

N/A

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 3 Requirements

- ☒ Inspected and screened all outfalls/interconnections (excluding Problem and Excluded outfalls)
☒ Updated outfall/interconnection priority ranking based on the information collected during the dry weather inspections as necessary
☐ Post-construction bylaw, ordinance, or other regulatory mechanism was updated and adopted consistent with permit requirements

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 3 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:

The post-construction bylaw, ordinances, and other regulatory mechanisms are in progress with the Town and are expected to be incorporated into the Town's ordinances and bylaws at the Spring 2022 annual Town Meeting.

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 system map due in year 2 as necessary
- ☒ Enclosed all road salt storage piles or facilities and implemented winter road maintenance procedures to minimize the use of road salt
- ☒ Implemented SWPPPs for all permittee owned or operated maintenance garages, public works yards, transfer stations, and other waste handling facilities
- ☒ Updated inventory of all permittee owned facilities as necessary
- ☒ O&M programs for all permittee owned facilities have been completed and updated as necessary
- ☒ Implemented all maintenance procedures for permittee owned facilities in accordance with O&M programs
- ☒ Implemented program for MS4 infrastructure maintenance to reduce the discharge of pollutants
- ☒ Inspected all permittee owned treatment structures (excluding catch basins)

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:

N/A

Nitrogen (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) that encourages the proper use and disposal of grass clippings and encourages the proper use of slow-release 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 listed in Table 3 of Attachment 1 to Appendix H already existing or installed in the regulated area by the permittee or its agents was tracked and the nitrogen removal by the BMP was

- ☐ estimated consistent with Attachment 1 to Appendix H. The BMP type, total area treated by the BMP, the design storage volume of the BMP and the estimated nitrogen 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:

The Town has noted BMPs on its Phase I Map. The Town is currently evaluating these BMPs and is assessing means to track nitrogen removal.

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:

The Town has noted BMPs in its Phase I Map. The Town is currently evaluating these BMPs and is assessing means to track phosphorus removal.

Solids, Oil and Grease (Hydrocarbons), or Metals

Annual Requirements

Good Housekeeping and Pollution Prevention for Permittee Owned Operations

- ☒ Increased street sweeping frequency of all municipal owned streets and parking lots to a schedule that targets areas with potential for high pollutant loads
- Prioritized inspection and maintenance for catch basins to ensure that no sump shall be more than 50
- ☒ percent full; Cleaned catch basins more frequently if inspection and maintenance activities indicated excessive sediment or debris loadings

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:

N/A

Lake and Pond Phosphorus TMDL

- ☒ Completed the funding source assessment

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:

The Legal Analysis requirement was also completed during the Year 3 reporting period.

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:

The number of outfalls for each receiving waterbody was adjusted after dry weather outfall investigations were conducted. The current number of outfalls are shown in the Year 3 Stormwater Management Program, which can be found at the following link: <https://www.leicesterma.org/highway-department/pages/stormwater-information>

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: Proper Disposal of Pet Waste

Message Description and Distribution Method:

The public education flyer encourages pet owners to properly dispose of pet waste in order to help reduce stormwater pollution. A copy of the flyer is provided with a dog license application or renewal. The flyer was distributed at Town offices. A new link to an updated flyer was provided under the stormwater page at the Town's website and the flyer was posted on the Town of Leicester home page. A link to the updated flyer was posted to the Town's social media accounts during the Year 3 reporting period.

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

In July 2020, 150 copies were printed for distribution. The flyer has been available on the Town website since June 2019. The Town is monitoring the number of copies distributed. The Town had 1,140 followers on Twitter at the time the flyer was posted.

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: Tips for Proper Leaf Disposal

Message Description and Distribution Method:

The public education flyer provides tips to residents as to how they can help protect local waterways through proper leaf disposal. This includes mulching and composting. A link to the flyer was posted to the Town's social media accounts during the Year 3 reporting period. A link to the flyer was also provided under the stormwater page at the Town's website and the flyer was posted on the Town of Leicester home page.

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

The Town has approximately 1,140 followers on Twitter.

Message Date(s): 10/22/2020

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 and Lawn Maintenance

Message Description and Distribution Method:

The public education flyer included tips involving lawn maintenance and use of phosphorus free slow release fertilizers to help reduce stormwater pollution. The flyer was distributed at Town offices. A new link to the brochure was provided under the stormwater page at the Town's website and posted on the Town of Leicester home page. A link to the flyer was posted to the Town's Twitter account during the Year 3 reporting period.

Targeted Audience: Residents

Responsible Department/Parties: Highway Department

Measurable Goal(s):

250 copies were printed for distribution in the Spring of 2021. The Town is monitoring the number of copies distributed. The Town has approximately 1,140 followers on Twitter.

Message Date(s): 4/29/2021

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:**

The Town's SWMP is posted on the Town of Leicester website stormwater link for viewing by the public. In addition, a hard copy of the SWMP is located at the Highway Department Office for review by the public.

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:**

The Town's Household Hazardous Waste Cleanup Day was held on April 2, 2021 at the Highway Department garage. Due to COVID-19, the Annual Public Safety Day was postponed during the reporting period.

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

Optional: Provide additional status information regarding your map:

Current MS4 system mapping follows Phase I requirements. No updates were made during the Year 3 reporting period.

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. Please also include the updated inventory and ranking of outfalls/interconnections based on monitoring results.

- ☐ No outfalls were inspected
- ☒ 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: 89

Below, report on the percent of outfalls/interconnections screened **to date**.

Percent of outfalls screened: 100

Optional: Provide additional information regarding your outfall/interconnection screening:

Four outfalls had dry weather flow and were subsequently sampled. Outfalls 74 and 75, located on Grove Street, indicated a possible illicit discharge. Additional samples were collected from two upstream manholes, one catch basin, and Outfall 74. It was determined that the potential illicit discharge originated at the manhole between 69 and 65 Grove Street. The Town continues to investigate this potential illicit discharge. Any outfall in an area of concern to public health or going to an impaired waterbody is considered "High Priority" in the Outfall Inventory and Priority Ranking Matrix.

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.

- ☒ No catchment investigations were conducted
- ☐ 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: 0

Below, report on the percent of catchments investigated **to date**.

Percent of total catchments investigated: 0

Optional: Provide any additional information for clarity regarding the catchment investigations below:

The Town has developed a methodology for catchment investigations and will utilize this methodology to investigate catchments associated with Problem Outfalls by the end of the Year 7 reporting period.

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.

- ☐ No illicit discharges were found
- ☒ 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: 0

Number of illicit discharges removed: 0

Estimated volume of sewage removed: 0 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: 0

Total number of illicit discharges removed: 0

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

Outfalls 74 and 75, located on Grove Street, indicated a possible illicit discharge. Additional samples were collected from two upstream manholes, one catch basin, and Outfall 74. It was determined that the potential illicit discharge originated at the manhole between 69 and 65 Grove Street. The Town continues to investigate this potential illicit discharge. An Illicit Discharge Tracking Sheet is provided with this Annual Report summarizing completed and planned corrective measures taken.

Employee Training

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

A training session was held for Highway Department personnel on December 16, 2020. A total of eleven employees attended the session. The training session included a presentation on the basic principles of illicit discharges, examples of illicit and non-illicit discharges, short training videos, an overview of the Town's IDDE bylaw, discussion on SSOs, review of Town inspection forms, and methods for implementing corrective actions if an illicit discharge is discovered. Documentation of the IDDE training session is included in the Town's written IDDE Plan, which was updated in June 2021 and included as part of the Town's SWMP.

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: 4

Number of inspections completed: 0

Number of enforcement actions taken: 0

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

The Town completed four site plan reviews during the reporting period and currently has one site plan under review.

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

As-built Drawings

*Below, report on the number of as-built drawings received **during this reporting period**.*

Number of as-built drawings received:

Optional: Enter any additional information relevant to the submission of as-built drawings:

N/A

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:

This assessment has not yet been started to date.

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:

This report has not been started to date.

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:

This inventory has not been compiled to date.

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: 1,500

Number of catch basins cleaned: 1,500

Total volume or mass of material removed from all catch basins: 400 cubic yards

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

Total number of catch basins: 1,265

If applicable:

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

The Town of Leicester is working on surface runoff control to stabilize flow at two locations, including the intersection of Westminster and Stafford Street, and the intersection of Sabina and Charlton Street.

All problem catch basins are cleaned twice per year.

Drainage system repairs are completed by Highway Department personnel when blockages are detected and catch basin inspections reveal structural and operational deficiencies.

Street Sweeping

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

☒ Number of miles cleaned: 175

☐ Volume of material removed: [Select Units]

☐ Weight of material removed: [Select Units]

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: 2

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

N/A

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:

N/A

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:

The Highway Department typically repairs an average of 15-20 catch basins per year in order to maintain infrastructure quality.

Leicester conducts jetting in areas of the drainage system where any blockages are observed.

Leicester updated its SWPPP for the Highway Department Garage in Year 3.

COVID-19 Impacts

Optional: If any of the above year 3 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:

N/A

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

Yes, I agree ☒

- Develop a report assessing current street design and parking lot guidelines and other local requirements within the municipality that affect the creation of impervious cover
- Develop a report assessing existing local regulations to determine the feasibility of making green infrastructure practices allowable when appropriate site conditions exist
- Identify a minimum of 5 permittee-owned properties that could potentially be modified or retrofitted with BMPs to reduce impervious areas

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 curbed streets at least annually
- Continue investigations of catchments associated with Problem Outfalls
- Implemented SWPPPs for all permittee owned or operated maintenance garages, public works yards, transfer stations, and other waste handling facilities
- 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
- Review O&M programs for all permittee owned facilities; update if necessary
- Implement all maintenance procedures for permittee owned facilities in accordance with O&M programs
- Implement program for MS4 infrastructure maintenance to reduce the discharge of pollutants
- Enclose all road salt storage piles or facilities and implemented winter road maintenance procedures to minimize the use of road salt
- Review as-built drawings for new and redevelopment to ensure compliance with post construction bylaws, regulations, or regulatory mechanism consistent with permit requirements

- Inspect all permittee owned treatment structures (excluding catch basins)

Provide any additional details on activities planned for permit year 4 below:

Part V: Certification of Small MS4 Annual Report 2021

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:

David A. Genereux

Title:

Town Administrator

Signature:

Date:

*[Signatory may be a duly authorized
representative]*