

# Notice of Intent (NOI) for coverage under Small MS4 General Permit Page 1 of 19

## Part I: General Conditions

### General Information

Name of Municipality or Organization:  State:   
EPA NPDES Permit Number (if applicable):

### Primary MS4 Program Manager Contact Information

Name:  Title:   
Street Address Line 1:   
Street Address Line 2:   
City:  State:  Zip Code:   
Email:  Phone Number:   
Fax Number:

### Other Information

Stormwater Management Program (SWMP) Location (web address or physical location, if already completed):

### Eligibility Determination

Endangered Species Act (ESA) Determination Complete?  Eligibility Criteria (check all that apply):  A  B  C  
National Historic Preservation Act (NHPA) Determination Complete?  Eligibility Criteria (check all that apply):  A  B  C

Check the box if your municipality or organization was covered under the 2003 MS4 General Permit

### MS4 Infrastructure (if covered under the 2003 permit)

Estimated Percent of Outfall Map Complete?  If 100% of 2003 requirements not met, enter an estimated date of completion (MM/DD/YY):

Web address where MS4 map is published:   
If outfall map is unavailable on the internet an electronic or paper copy of the outfall map must be included with NOI submission (see section V for submission options)

### Regulatory Authorities (if covered under the 2003 permit)

<b>Illicit Discharge Detection and Elimination (IDDE) Authority Adopted?</b> <small>(Part II, III, IV or V, Subpart B.3.(b.) of 2003 permit)</small>	<input type="text" value="Yes"/>	Effective Date or Estimated Date of Adoption (MM/DD/YY):	<input type="text" value="03/28/05"/>
<b>Construction/Erosion and Sediment Control (ESC) Authority Adopted?</b> <small>(Part II, III, IV or V, Subpart B.4.(a.) of 2003 permit)</small>	<input type="text" value="Yes"/>	Effective Date or Estimated Date of Adoption (MM/DD/YY):	<input type="text" value="08/04/14"/>
<b>Post- Construction Stormwater Management Adopted?</b> <small>(Part II, III, IV or V, Subpart B.5.(a.) of 2003 permit)</small>	<input type="text" value="Yes"/>	Effective Date or Estimated Date of Adoption (MM/DD/YY):	<input type="text" value="08/04/14"/>



[Click to lengthen table](#)

## Notice of Intent (NOI) for coverage under Small MS4 General Permit

### Part III: Stormwater Management Program Summary

Identify the Best Management Practices (BMPs) that will be employed to address each of the six Minimum Control Measures (MCMs). For municipalities/organizations whose MS4 discharges into a receiving water with an approved Total Maximum Daily Load (TMDL) and an applicable waste load allocation (WLA), identify any additional BMPs employed to specifically support the achievement of the WLA in the TMDL section at the end of part III.

For each MCM, list each existing or proposed BMP by category and provide a brief description, responsible parties/departments, measurable goals, and the year the BMP will be employed (public education and outreach BMPs also requires a target audience). **Use the drop-down menus in each table or enter your own text to override the drop down menu.**

#### MCM 1: Public Education and Outreach

BMP Media/Category <small>(enter your own text to override the drop down menu)</small>	BMP Description	Targeted Audience	Responsible Department/Parties <small>(enter your own text to override the drop down menu)</small>	Measurable Goal	Beginning Year of BMP Implementation
Mailing	Consumer Confidence Report Ads	Residents	Department of Public Works	Deliver Annually	2018
Mailing	Consumer Confidence Report Ads	Businesses, Institutions and Commercial Facilities	Department of Public Works	Deliver Annually	2018
Brochures/Pamphlets	Building Permit Handout	Developers (construction)	Building Permitting and Enforcement	Ongoing Availability	2018
Mailing	Consumer Confidence Report Ad	Industrial Facilities	Department of Public Works	Deliver Annually	2018
Web Page	Spring Fertilizer, Summer Pet Waste, Septic System and Fall Leaf Pick-up	Residents	Department of Public Works	Post Seasonal Message	2018
Web Page	Spring Fertilizer, Summer Pet Waste, Septic System and Fall Leaf Pick-up	Businesses, Institutions and Commercial Facilities	Department of Public Works	Post Seasonal Message	2018
Brochures/Pamphlets	Septic system management BMPs Handout	Residents	Health Department	Ongoing Availability	2018
Brochures/Pamphlets	During Dog Licensing	Residents	City Clerk	Ongoing Availability	2018







## Notice of Intent (NOI) for coverage under Small MS4 General Permit

**Part III: Stormwater Management Program Summary (continued)**

**MCM 3: Illicit Discharge Detection and Elimination (IDDE)**

<b>BMP Categorization</b> (enter your own text to override the drop down menu)	<b>BMP Description</b>	<b>Responsible Department/Parties</b> (enter your own text to override the drop down menu)	<b>Measurable Goal</b> (all text can be overwritten)	<b>Beginning Year of BMP Implementation</b>
SSO inventory	Develop SSO inventory in accordance of permit conditions	Department of Public Works	Complete within 1 year of effective date of permit	2018
Storm sewer system map	Create map and update during IDDE program completion	Department of Public Works	Update map within 2 years of effective date of permit and complete full system map 10 years after effective date of permit	2018
Written IDDE program	Create written IDDE program	Department of Public Works	Complete within 1 year of the effective date of permit and update as required	2018
Implement IDDE program	Implement catchment investigations according to program and permit conditions	Department of Public Works	Complete 10 years after effective date of permit	2018
Employee training	Train employees on IDDE implementation	Department of Public Works	Train annually	2018
Conduct dry weather screening	Conduct in accordance with outfall screening procedure and permit conditions	Department of Public Works	Complete 3 years after effective date of permit	2018
Conduct wet weather screening	Conduct in accordance with outfall screening procedure	Department of Public Works	Complete 10 years after effective date of permit	2019
Ongoing screening	Conduct dry weather and wet weather screening (as necessary)	Department of Public Works	Complete ongoing outfall screening upon completion of IDDE program	2018



### Notice of Intent (NOI) for coverage under Small MS4 General Permit

**Part III: Stormwater Management Program Summary (continued)**

**MCM 4: Construction Site Stormwater Runoff Control**

<b>BMP Categorization</b> (enter your own text to override the drop down menu or entered text)	<b>BMP Description</b>	<b>Responsible Department/Parties</b> (enter your own text to override the drop down menu)	<b>Measurable Goal</b> (all text can be overwritten)	<b>Beginning Year of BMP Implementation</b>
Site inspection and enforcement of Erosion and Sediment Control (ESC) measures	Complete written procedures of site inspections and enforcement procedures	Conservation	Complete within 1 year of the effective date of permit	2018
Site plan review	Complete written procedures of site plan review and begin implementation	Planning/zoning Department	Complete within 1 year of the effective date of permit	2018
Erosion and Sediment Control	Adoption of requirements for construction operators to implement a sediment and erosion control program	Conservation	Complete within 1 year of the effective date of permit	2018
Waste Control	Adoption of requirements to control wastes, including but not limited to, discarded building materials, concrete truck wash out, chemicals, litter, and sanitary wastes	Conservation	Complete within 1 year of the effective date of permit	2018



## Notice of Intent (NOI) for coverage under Small MS4 General Permit

### Part III: Stormwater Management Program Summary *(continued)*

#### MCM 5: Post-Construction Stormwater Management in New Development and Redevelopment

<b>BMP Categorization</b> (enter your own text to override the drop down menu or entered text)	<b>BMP Description</b>	<b>Responsible Department/Parties</b> (enter your own text to override the drop down menu)	<b>Measurable Goal</b> (all text can be overwritten)	<b>Beginning Year of BMP Implementation</b>
As-built plans for on-site stormwater control	The procedures to require submission of as-built drawings and ensure long term operation and maintenance will be a part of the SWMP	Conservation	Require submission of as-built plans for completed projects	2018
Target properties to reduce impervious areas	Identify at least 5 permittee-owned properties that could be modified or retrofitted with BMPs to reduce impervious areas and update annually	Department of Public Works	Complete 4 years after effective date of permit and report annually on retrofitted properties	2018
Allow green infrastructure	Develop a report assessing existing local regulations to determine the feasibility of making green infrastructure practices allowable when appropriate site conditions exist	Department of Public Works	Complete 4 years after effective date of permit and implement recommendations of report	2020
Street design and parking lot guidelines	Develop a report assessing requirements that affect the creation of impervious cover. The assessment will help determine if changes to design standards for streets and parking lots can be modified to support low impact design options.	Engineering	Complete 4 years after effective date of permit and implement recommendations of report	2020



### Notice of Intent (NOI) for coverage under Small MS4 General Permit

**Part III: Stormwater Management Program Summary (continued)**

**MCM 6: Municipal Good Housekeeping and Pollution Prevention**

<b>BMP Categorization</b> (enter your own text to override the drop down menu or entered text)	<b>BMP Description</b>	<b>Responsible Department/Parties</b> (enter your own text to override the drop down menu)	<b>Measurable Goal</b> (all text can be overwritten)	<b>Beginning Year of BMP Implementation</b>
O&M procedures	Create written O&M procedures including all requirements contained in 2.3.7.a.ii for parks and open spaces, buildings and facilities, and vehicles and equipment	Department of Public Works	Complete and implement 2 years after effective date of permit	2019
Inventory all permittee-owned parks and open spaces, buildings and facilities, and vehicles and equipment	Create inventory	Department of Public Works	Complete 2 years after effective date of permit and implement annually	2019
Infrastructure O&M	Establish and implement program for repair and rehabilitation of MS4 infrastructure	Department of Public Works	Complete 2 years after effective date of permit	2018
Stormwater Pollution Prevention Plan (SWPPP)	Create SWPPPs for maintenance garages, transfer stations, and other waste-handling facilities	Department of Public Works	Complete and implement 2 years after effective date of permit	2019
Catch basin cleaning	Establish schedule for catch basin cleaning such that each catch basin is no more than 50% full and clean catch basins on that schedule	Department of Public Works	Clean catch basins on established schedule and report number of catch basins cleaned and volume of material moved annually	2018
Street sweeping program	Sweep all streets and permittee-owned parking lots in accordance with permit conditions	Department of Public Works	Sweep all streets and permittee-owned parking lots once per year in the spring	2018
Road salt use optimization program	Establish and implement a program to minimize the use of road salt	Department of Public Works	Implement salt use optimization during deicing season	2018







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### Part IV: Notes and additional information

Use the space below to indicate the part(s) of 2.2.1 and 2.2.2 that you have identified as not applicable to your MS4 because you do not discharge to the impaired water body or a tributary to an impaired water body due to nitrogen or phosphorus. Provide all supporting documentation below or attach additional documents if necessary. Also, provide any additional information about your MS4 program below.

Click to add text

## Notice of Intent (NOI) for coverage under Small MS4 General Permit

### Part V: 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:

Title:

Signature:

Date:

[To be signed according to Appendix B, Subparagraph B.11, Standard Conditions]

Note: When prompted during signing, save the document under a new file name



Part V: 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:

Title:

Signature:

Date:

[To be signed according to Appendix B, Subparagraph B.11, Standard Conditions]

Note: When prompted during signing, save the document under a new file name



Department of Public Works  
*City of Leominster, Massachusetts 01453*  
109 Graham Street  
Tel: 978-534-7590  
Fax: 978-534-7599  
www.leominster-ma.gov



August 17, 2018

Newton Tedder  
US Environmental Protection Agency  
Stormwater and Construction Permits Section (OEP06-1)  
Five Post Office Square, Suite 100  
Boston, MA 02109

**Re: Endangered Species Determination for Leominster, MA Associated with the MA MS4 General Permit**

Dear Mr. Tedder:

The City of Leominster, MA is a non-federal representative designated by the Environmental Protection Agency (EPA) for conducting formal or informal consultation with the U.S. Fish and Wildlife Service.

I have evaluated the United States Fish & Wildlife Service iPAC Biological and Conservation Data System files in response to new regulation promulgation under the 2016 Massachusetts Municipal Separate Sewer System (MS4) General Permit. The objective of this review is to determine the presence of endangered or threatened species within the program implementation area in Leominster, MA.

Our review evaluated the area of impact of required program activities, analysis of these program activity areas within the iPAC database, examining maps, other sources of information, and the personal knowledge of staff or cooperating experts.

According to the information currently in the iPAC database, there are two threatened species within the proposed project area (Small Whorled Pogonia and Northern Long-Eared Bat) and no critical habitat. Please see Attachment 1 as the official species list.

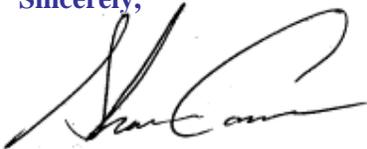
The proposed stormwater program activities are a continuation of previous permitted activities and include non-structural management of stormwater runoff as required by the MA MS4 General Permit. These activities will include education, investigation, and pollutant source control on existing municipal facilities and roadways and will not disturb terrestrial vegetation. Both listed species are sensitive to land disturbance and as the program implementation will not disturb vegetation we have therefore determined that our programmatic activities will have “no affect” on the listed species.

If during the course of the permit term we plan to install structural stormwater treatment practices or engage in other land disturbing activities as a result of compliance with the MS4 General Permit, the City of Leominster will initiate further informal or formal consultation with the USFWS.

**Based on this review and an evaluation of determination requirements outlined in Appendix C of the MA MS4 General Permit, we have determined that we meet Criterion C. We request EPA's concurrence of this determination for inclusion in our Stormwater Management Program Plan.**

**Please do not hesitate to contact me if you have further questions about Leominster's stormwater management program.**

**Sincerely,**

A handwritten signature in black ink, appearing to read "Shawn Comeau", written in a cursive style.

**Shawn Comeau  
Stormwater Coordinator  
City of Leominster  
978-534-7590  
scomeau@cityofleominster.org**



# United States Department of the Interior



FISH AND WILDLIFE SERVICE  
New England Ecological Services Field Office  
70 Commercial Street, Suite 300  
Concord, NH 03301-5094  
Phone: (603) 223-2541 Fax: (603) 223-0104  
<http://www.fws.gov/newengland>

In Reply Refer To:  
Consultation Code: 05E1NE00-2017-SLI-1182  
Event Code: 05E1NE00-2018-E-06559  
Project Name: City of Leominster Stormwater Discharges

August 17, 2018

Subject: Updated list of threatened and endangered species that may occur in your proposed project location, and/or may be affected by your proposed project

## To Whom It May Concern:

The enclosed species list identifies threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitat, that may occur within the boundary of your proposed project and/or may be affected by your proposed project. The species list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*).

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Please feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the ECOS-IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the ECOS-IPaC system by completing the same process used to receive the enclosed list.

The purpose of the Act is to provide a means whereby threatened and endangered species and the ecosystems upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 *et seq.*), Federal agencies are required to utilize their authorities to carry out programs for the conservation of threatened and endangered species and to determine whether projects may affect threatened and endangered species and/or designated critical habitat.

A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2)(c)). For projects other than major construction activities, the Service suggests that a biological evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

If a Federal agency determines, based on the Biological Assessment or biological evaluation, that listed species and/or designated critical habitat may be affected by the proposed project, the agency is required to consult with the Service pursuant to 50 CFR 402. In addition, the Service recommends that candidate species, proposed species and proposed critical habitat be addressed within the consultation. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found in the "Endangered Species Consultation Handbook" at:

<http://www.fws.gov/endangered/esa-library/pdf/TOC-GLOS.PDF>

Please be aware that bald and golden eagles are protected under the Bald and Golden Eagle Protection Act (16 U.S.C. 668 *et seq.*), and projects affecting these species may require development of an eagle conservation plan ([http://www.fws.gov/windenergy/eagle\\_guidance.html](http://www.fws.gov/windenergy/eagle_guidance.html)). Additionally, wind energy projects should follow the wind energy guidelines (<http://www.fws.gov/windenergy/>) for minimizing impacts to migratory birds and bats.

Guidance for minimizing impacts to migratory birds for projects including communications towers (e.g., cellular, digital television, radio, and emergency broadcast) can be found at: <http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/towers.htm>; <http://www.towerkill.com>; and <http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/comtow.html>.

We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to include conservation of threatened and endangered species into their project planning to further the purposes of the Act. Please include the Consultation Tracking Number in the header of this letter with any request for consultation or correspondence about your project that you submit to our office.

Attachment(s):

- Official Species List
-

## Official Species List

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

**New England Ecological Services Field Office**

70 Commercial Street, Suite 300

Concord, NH 03301-5094

(603) 223-2541

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## Project Summary

Consultation Code: 05E1NE00-2017-SLI-1182

Event Code: 05E1NE00-2018-E-06559

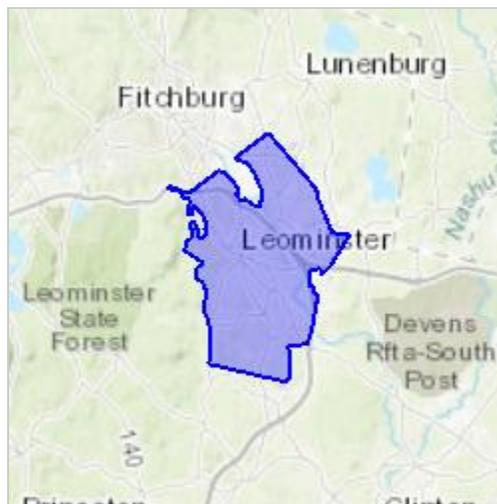
Project Name: City of Leominster Stormwater Discharges

Project Type: Regulation Promulgation

Project Description: The project includes non-structural management of stormwater runoff as required by the MA MS4 General Permit. These activities will almost entirely include pollutant source control on existing municipal facilities and roadways. If during the course of the permit term we plan to install structural stormwater treatment practices the City of Leominster will initiate informal or formal consultation with the USFWS as necessary. The project area was defined based on regulated MS4 boundary as defined by EPA.

Project Location:

Approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/place/42.52504413567837N71.74685457619339W>



Counties: Worcester, MA

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## Endangered Species Act Species

There is a total of 2 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries<sup>1</sup>, as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

- 
1. [NOAA Fisheries](#), also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

### Mammals

NAME	STATUS
Northern Long-eared Bat <i>Myotis septentrionalis</i> No critical habitat has been designated for this species. Species profile: <a href="https://ecos.fws.gov/ecp/species/9045">https://ecos.fws.gov/ecp/species/9045</a>	Threatened

### Flowering Plants

NAME	STATUS
Small Whorled Pogonia <i>Isotria medeoloides</i> No critical habitat has been designated for this species. Species profile: <a href="https://ecos.fws.gov/ecp/species/1890">https://ecos.fws.gov/ecp/species/1890</a>	Threatened

### Critical habitats

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

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**Newton Tedder**  
**US Environmental Protection Agency**  
**Stormwater and Construction Permits Section (OEP06-1)**  
**Five Post Office Square, Suite 100**  
**Boston, MA 02109**

The City of Leominster (MS4 permittee) has determined that the discharges regulated under this permit do not have the potential to cause effects on National Register of Historic Properties.

The implementation of this Stormwater Management Plan (SWMP) will require development of standards of practice, compliance documentation, investigation and operations of existing drainage facilities, local regulatory policies and other studies. The SWMP does not obligate the City of Leominster to undertake any activity involving subsurface land disturbance and program implementation will only take place on existing municipal separate storm sewer systems that have been previously authorized for coverage under the MS4 General Permit.

If during the course of MS4 General Permit program implementation, the City of Leominster anticipates subsurface land disturbance as a result of this General Permit, the City will prepare a complete information submittal to the State Historic Preservation Office.

Sincerely,

**Shawn Comeau**  
**Stormwater Coordinator**  
**City of Leominster**  
**978-534-7590**  
**scomeau@cityofleominster.org**



## CM 1: Public Education and Outreach (Permit Section 2.3.2)

Objective: Implement an education program that addresses stormwater issues of significance. The ultimate objective of a public education program is to increase knowledge of and help change behaviors of the public so that pollutants in stormwater are reduced. The “public” as defined in the MS4 General Permit are residents, businesses/institutions, developers/contractors, and industrial facilities.

BMP ID #	BMP Description	Permit Section Reference	Measurable Goal(s)	Deadline(s)
1.1	Develop public education program plan (Education and Outreach Plan)	2.3.2.a	<p>Develop an Education &amp; Outreach (E&amp;O) Plan which will outline an education approach that is inclusive of all education requirements across the permit and for impaired waters.</p> <ul style="list-style-type: none"> <li>• Develop educational messages to be distributed to target audiences, consider the topics listed in 2.3.2.d of the MS4 General Permit.</li> <li>• Develop educational messages specific to the areas that discharge to priority waters, impaired waters, and drinking water supplies.</li> <li>• Plan to provide educational web content and other publicly accessible resources.</li> <li>• Consider needs specific to community based on language, types of businesses, etc.</li> <li>• Develop methods to evaluate effectiveness of the messages and overall education program.</li> </ul>	End of Permit Year (PY) 1
1.2	Deliver targeted/timed educational messages	2.3.2.c	Post educational messages on the City website. Maintain educational content throughout the permit term.	End of PY 1
			Distribute a minimum of 1 additional educational message to each of the 4 target audiences. (Ensure that messages to each audience are at least 1 year apart.)	End of PY 2
			Distribute a minimum of 1 educational message to each of the 4 target audiences (residents, commercial, construction, industrial.)	End of PY 5
1.3	Deliver supplemental educational messages in areas that discharge to Total Phosphorus impaired waterbodies (Nashua River Watershed)	2.2.2.b.i.1 & Appendix H part II	For areas that discharge to waterbodies with a Total Phosphorus impairment, distribute 1 educational message in the June/July timeframe of each permit year that pertains to proper pet waste management.	Annual (June/July)
			For areas that discharge to waterbodies with a Total Phosphorus impairment, distribute 1 educational message in Aug./Sept./Oct. timeframe of each permit year that pertains to proper disposal of leaf litter.	Annual (Aug/Sept/Oct)



BMP ID #	BMP Description	Permit Section Reference	Measurable Goal(s)	Deadline(s)
			For areas that discharge to waterbodies with a Total Phosphorus impairment, distribute 1 educational message in March/April timeframe of each permit year that pertains to proper disposal of grass clippings and fertilizer use.	Annual (March/April)
1.4	Deliver supplemental educational messages in areas that discharge to bacteria or pathogen impaired waterbodies (Monoosnuc Brook, North Nashua River)	2.2.2.c.i.1 &	For areas that discharge to bacteria or pathogen impaired water bodies, provide educational materials to dog owners at the time of issuance or renewal of a dog license, or other appropriate time. These education materials describe the detrimental impacts of improper management of pet waste, requirements for waste collection and disposal, and penalties for noncompliance.	Throughout Permit Term
		Appendix H part III	For areas that discharge to bacteria or pathogen impaired water bodies, provide educational materials to owners of septic systems about proper maintenance (as applicable).	Annual
1.5	Assess educational program and modify if needed	2.3.2.e	Assess effectiveness of the educational program per the E&O Plan and modify messages if needed. Modify ineffective messages, if any, prior to next message delivery.	Annual



## CM 2: Public Involvement and Participation (Permit Section 2.3.3)

Objective: Provide opportunities to engage the public to participate in the review and implementation of the SWMP.

BMP ID #	BMP Description	Permit Section Reference	Measurable Goal(s)	Deadline(s)
2.1	Conduct public participation activities	2.3.3.b	Allow public participation in the implementation of the SWMP, annually. All public involvement activities shall comply with state public notice requirements.  Document and report on activities.	Annual
2.2	Provide opportunity for public to review SWMP	2.3.3.b & c	Allow public participation in review of the SWMP annually. Facilitate public review of SWMP, annually. Allow public to comment on SWMP, annually. All public involvement activities shall comply with state public notice requirements.  Document public review and public comments.	Annual
2.3	Make program documents available to the public	2.3.3.a	Post the SWMP and all Annual Reports on City website (following public notice requirements).	Annual



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## 1.2 WATER QUALITY STANDARDS

### 1.2.1 Impaired Waters

Discharges to waterbodies with approved TMDL or to water quality limited water bodies, or discharges causing or contributing to impairment have additional requirements in parts 2.1 and 2.2 of the MS4 General Permit. The City of Leominster MS4 discharges to waterbodies that are considered impaired, according to MassDEP's 2014 Integrated List of Waters (Integrated List). Both the Monoosnuc Brook and North Nashua Rivers are listed as TMDL Category 5, meaning a TMDL is required due to bacteria impairment. Additionally, three ponds and lakes are listed as TMDL Category 4, meaning a TMDL is complete, however the lakes and ponds do not require special monitoring obligations under the MS4 General Permit. Additionally, Leominster is specifically identified in 2.2.2.b.i. of the MS4 General Permit regarding Total Phosphorus impaired waters. While no segment of waters within Leominster is listed in the Integrated List for phosphorus impairment, the Nashua River as a whole is impaired due to phosphorus. This reference in 2.2.2.b.i. obligates Leominster to meet provisions of Appendix H and are described below. A list of impaired waters that are within the City of Leominster and their impairment causes is provided in Table 1-1 on the following page. A map showing MassDEP's 2014 Integrated Waters for the city of Leominster is provided in Appendix C of this SWMP.

For the areas within the City that directly discharge to impaired waterbody segments with or without an approved TMDL, there are additional control measures or BMPs that have been established, as required by parts 2.1 and 2.2 of the MS4 General Permit. A description of the BMPs and measurable goal(s) associated with these requirements have been integrated into Section 1.1 of this SWMP. The following is a summary of the additional permit requirements, per Appendix H of the General Permit:

- For the areas that discharge to waters that are impaired by Total Phosphorus (Nashua River Watershed):
  - Supplement the Residential and Business/Commercial/Institutional public education and outreach program with an annual timed message on specific topics (March/April: disposal of grass clippings and fertilizer use; June/July: proper management of pet waste; August/September/October: proper disposal of leaf litter).
  - Adopt or amend an ordinance or other regulatory mechanism that includes a requirement that new development or redevelopment stormwater management BMPs be optimized for phosphorus removal.
  - Include consideration of BMPs that infiltrate stormwater where feasible in retrofit inventory and priority.
  - Establish housekeeping procedures to manage grass cuttings and leaf litter on permittee property.
  - Increase street sweeping frequencies on all municipally owned streets and parking lots to a minimum of 2x per year (one time each spring and fall).
  - Develop a Phosphorus Source Identification Report which includes the total MS4 area draining to each water quality limited receiving water, all screening and monitoring results, impervious area and DCIA for the target catchment, identification, delineation and prioritization of potential catchments with high phosphorus loading, and identification of potential retrofit opportunities or installation of structural BMPs during redevelopment.
  - Evaluate all properties presenting retrofitting opportunities or areas for structural BMP installation.



- Provide a listing of planned structural BMPs and a plan and schedule for the implementation of such BMPs.
- Estimate the total phosphorus removal provided by any structural BMP installed in the regulated area.
- For the areas that discharge to waters that are impaired by bacteria or pathogens but do not have an approved TMDL (Monoosnuc Brook, North Nashua River):
  - Supplement residential public education and outreach program with an annual message encouraging the proper management of pet waste and proper maintenance of septic systems.
  - Designate catchments draining to any waterbody impaired for bacteria or pathogens as either Problem or High Priority catchments in implementation of the IDDE program.

**Table 1-1: Impaired Waters in Leominster**

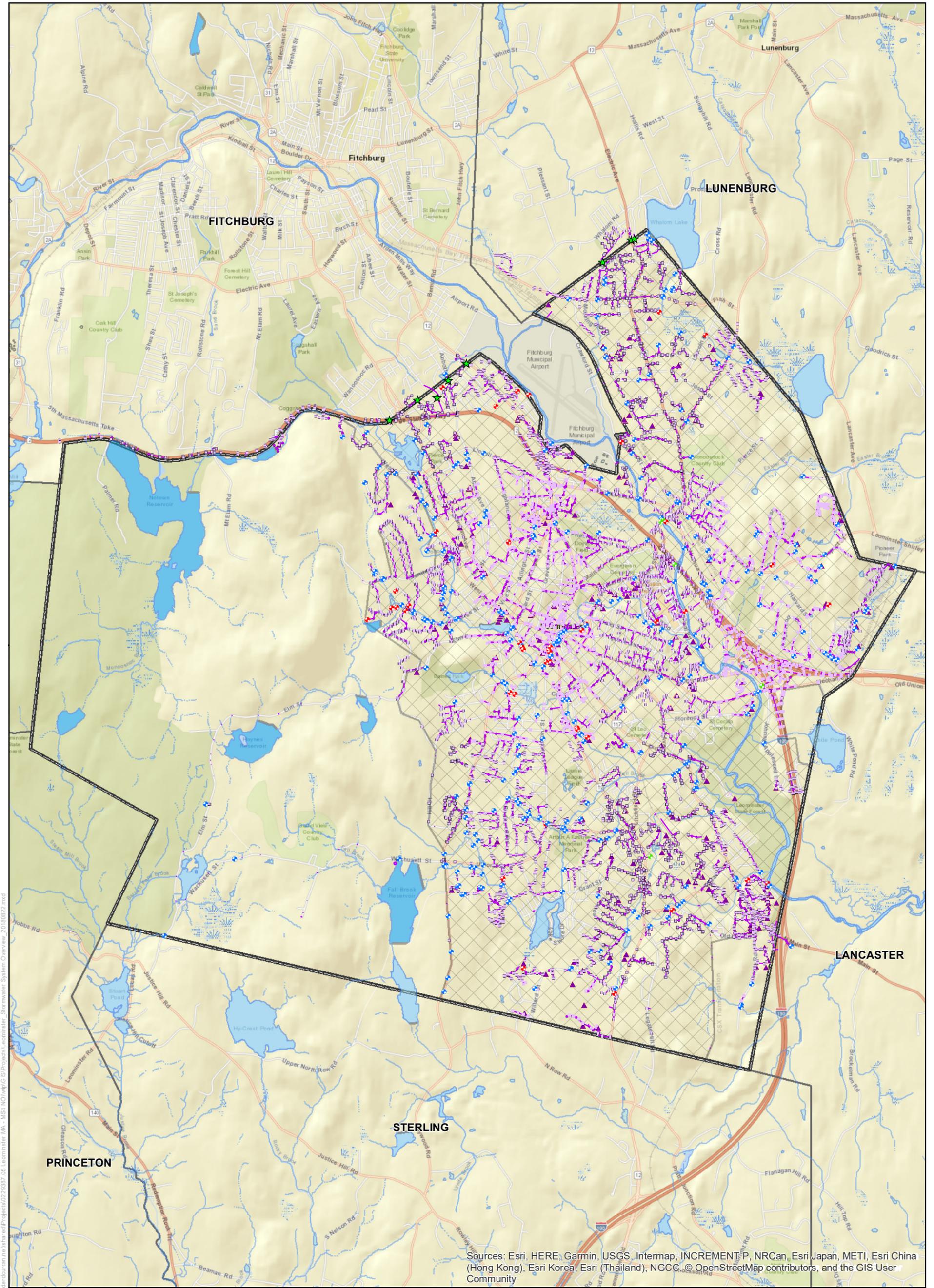
Waterbody	MassDEP Segment ID	TMDL	Category	Impairment Cause	Analytical Method (Appendix G)
North Nashua River	MA81-02	No	5	Ambient Bioassays – Chronic Aquatic Toxicity	Contact MassDEP
				Aquatic Macroinvertebrate Bioassessments	Contact MassDEP
				Escherichia Coli	1103.1; 1603; Colilert 12 16; Coli-18 12 15 16; mColiBlue-2417
North Nashua River	MA81-03	No	5	Escherichia Coli	1103.1; 1603; Colilert 12 16; Coli-18 12 15 16; mColiBlue-2417
North Nashua River	MA81-04	No	5	Escherichia Coli	1103.1; 1603; Colilert 12 16; Coli-18 12 15 16; mColiBlue-2417
				Taste and Odor	No Monitoring Required
Monoosnuc Brook	MA81-13	No	5	Escherichia Coli	1103.1; 1603; Colilert 12 16; Coli-18 12 15 16; mColiBlue-2417
Lake Whalom	MA81154	Yes	4a	Eurasian Water Milfoil, Myriophyllum Spicatum	No Monitoring Required
				Non-Native Aquatic Plants	No Monitoring Required



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Waterbody	MassDEP Segment ID	TMDL	Category	Impairment Cause	Analytical Method (Appendix G)
White Pond	MA81155	Yes	4c	Non-Native Aquatic Plants	No Monitoring Required
Lake Samoset	MA81116	Yes	4c	Non-Native Aquatic Plants	No Monitoring Required

Note: Reissuance and/or approval of the Massachusetts Integrated List of Waters may necessitate modifications to this Plan to maintain compliance with applicable requirements.



Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, © OpenStreetMap contributors, and the GIS User Community

# Stormwater Collection System Overview

City of Leominster, MA

- Legend**
- Leominster Boundary
  - Urbanized Area
  - Stormwater Pipe
  - Stormwater Catch Basin
  - Stormwater Manhole
  - Stormwater Interconnection
  - Stormwater BMP
- Stormwater Outfall Ownership**
- City of Leominster
  - Private
  - State



Project #: 0229387.05  
Map Created: July 2018

Figure Exported: 8/22/2018 By: esneeshy Using: \\woodardcurran.net\shared\Projects\0229387.05 Leominster MA - MS4 NOI\wp\GIS\Projects\Leominster Stormwater System Overview\_20180822.mxd

Third Party GIS Disclaimer: This map is for reference and graphical purposes only and should not be relied upon by third parties for any legal decisions. Any reliance upon the map or data contained herein shall be at the users' sole risk. **Data Sources:**

## Tedder, Newton

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**From:** Shawn Comeau <scomeau@DPW.Leominster-MA.Gov>  
**Sent:** Friday, September 28, 2018 12:43 PM  
**To:** Tedder, Newton  
**Cc:** Zach Henderson; Mark Piermarini; John Roseberry; Raymond Racine; abenevides.woodardcurran.com  
**Subject:** RE: Small MS4 NOI submission - additional or corrected information required  
**Attachments:** Leominster\_Stormwater System Overview\_20180822.pdf; Leominster Education and Outreach Plan.pdf; Leominster Impaired Waters.pdf

**Categories:** Record Saved - Shared

Greetings,

We received and reviewed the Small MS4 NOI Information Requested attachment in your email on Tuesday September 27. The following are our responses, as requested with the original EPA request in italics.

2003 Information: The link provided does not show outfall locations. Please provide an updated map or hard copy  
Leominster Response: The web map includes outfalls but requires you to navigate to the Layers tab and then click the "additional information" button in the lower left legend. You then will be provided with options for showing outfalls or other pipe features. We have gone ahead and attached a stormwater system overview figure as an alternative and which is include in our SWMP.

Please provide measurable goals specific to the public education messages and anticipated environmental outcome. For more information on measurable goals please see: <https://www3.epa.gov/npdes/pubs/measurablegoals.pdf>  
Leominster Response: We anticipate that we will track numbers of letters sent, number of brochures distributed and webpage "likes" as additional measurable goals. This information will be provided in our annual report. We are unsure what you mean by environmental outcomes but do anticipate a greater awareness and understanding of stormwater issues as a result of our efforts in the City of Leominster. We have attached an excerpt from our SWMP regarding these BMPs which provides additional detail on our measurable goals.

Please indicate which TMDLs are applicable to you and responsible parties for implementing permit terms  
Leominster Response: We recognize that we are responsible for provisions in section 2.2.2.b.related to waters impaired for phosphorus. We do not believe that we have been listed in the MS4 General Permit for any specific TMDLs, but we recognize that we are within the Nashua River watershed and therefore will be implementing additional measures focused on phosphorus control. The officially listed waterbody segments for the Nashua River (2014 Integrated List) lie outside the City. Our description of impaired and TMDL waters as outlined within our SWMP are also attached for reference.

Let us know if you have additional questions or needs.

Shawn Comeau  
MS4/OSHA Coordinator  
City of Leominster  
Dept. of public works  
109 Graham Street  
Leominster, MA 01453  
978-534-7590 Ext. 529

978-534-7599 Fax

-----Original Message-----

From: Tedder, Newton [mailto:Tedder.Newton@epa.gov]

Sent: Tuesday, September 25, 2018 6:08 PM

To: Shawn Comeau

Cc: Reports Stormwater; Zach Henderson

Subject: Small MS4 NOI submission - additional or corrected information required

EPA requires additional or corrected information to receive a complete NOI submission for your MS4 and continue the review process. Please respond to this email with the requested details in the attached report. You do not need to resubmit the NOI form.

Newton W. Tedder  
U.S. Environmental Protection Agency, Region 1  
5 Post Office Square, Suite 100  
Mail Code OEP06-4  
Boston, MA 02109-3912  
Phone: (617) 918-1038

All drains lead to the ocean