

Municipality/Organization: City of Lawrence

EPA NPDES Permit Number: MA 041201

MassDEP Transmittal Number: W-036114

**Annual Report Number
& Reporting Period:**

Year 12
April 1, 2014 – March 31, 2015

NPDES PII Small MS4 General Permit Annual Report (Due: May 1, 2015)

Part I. General Information

Contact Person: John R Isensee

Title: DPW Director

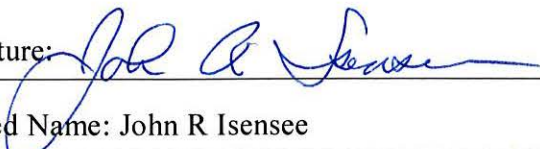
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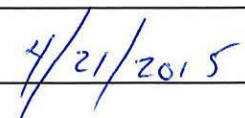
Certification:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature: 

Printed Name: John R Isensee

Title: DPW Director

Date: 

Part II. Self-Assessment

The City of Lawrence has completed the required self-assessment for Permit Year 12 and has determined that our municipality complies with all permit conditions.

During this Permit Year, the City has placed a significant focus on educating the public about water resource protection. Mayor Rivera initiated a bi-monthly newsletter in June 2014, which keeps residents informed of City issues and includes a section called “Make Lawrence Greener & Cleaner!” for news about ongoing City programs such as street sweeping and yard waste pick-up. Water quality information (e.g. Source Water Assessment and Protection, FOG, SSOs, etc.) is included in the City’s Annual Drinking Water Quality Report made available to all residents. To further increase transparency and accessibility of information, the Water & Sewer Department introduced social media pages in July 2014 and a new easy-to-remember website URL: www.cityoflawrence.com/water.

The City developed several programmatic documents for City staff and contractors to support MS4 General Permit requirements and improve water quality, including:

- Illicit Discharge Detection and Elimination (IDDE) Program Manual
 - o Illicit Discharge Monitoring Plan
 - o Illicit Discharge Investigation Plan
 - o Illicit Discharge Abatement Plan
- Emergency Response Plan for Sanitary Sewer Overflows (SSOs)
- Capacity, Management, Operations, and Maintenance (CMOM) Program Assessment
- Construction Site Erosion and Sediment Control (ESC) Program Manual

The City also implemented the use of an electronic SSO Reporting Tool, allowing for improved tracking and reporting of SSOs that could affect the City’s MS4 and water resource areas.

An aggressive sewer system investigation program was completed between April and October of 2014 to identify structural and operations and maintenance (O&M) defects in the City’s collection system. Sewer system rehabilitation is expected to be completed during the Summer and Fall of 2015 to improve sewer system functionality and reduce the likelihood of sewer exfiltration (i.e. indirect illicit discharge) into the City’s MS4.

Part III. Summary of Minimum Control Measures

1. Public Education and Outreach

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 12 (Reliance on non-municipal partners indicated, if any)	Planned Activities
1-A Revised	Classroom Education	DPW/Recycling Coordinator	Raise awareness starting with children	Groundwork Lawrence (GWL) developed recycling and clean water materials for youth education that are available at www.groundworklawrence.org/cleaning_and_greening. GWL also hosted a community cleanup event (Earth Day/Comcast Cares Day) on April 26, 2014. The City's Recycling Coordinator organizes an ongoing school outreach program.	Continue working with local groups to host community cleanup events Continue to provide school outreach program
1-B Revised	Educational Displays	DPW/Recycling Coordinator	Maintain awareness	Recycling information is available on the City's website at www.cityoflawrence.com/recycling-program.aspx. Printed materials are available at the DPW Office (City Hall, Room 201). The City of Lawrence provides an Annual Drinking Water Quality Report to its citizens. In addition to water quality of drinking water, the 2014 report covered topics related to sanitary sewer overflows, water conservation and Fats, Oil and Grease control which all indirectly benefit stormwater quality.	Continue to improve recycling and water quality information available on City's website, distributed through mailings or disseminated through local or regional organizations.

1-C	New Articles	DPW/Director	Clean problem locations	The City maintains several dozen hidden cameras in known problem areas. The City issued a press release on December 15, 2014, stating that over 50 tickets for illegal dumping in City alleyways have been issued. The press release is available on the City's website at www.cityoflawrence.com/SharedFiles/Download.aspx?pageid=541&mid=1184&fileid=9167 .	Continue to maintain hidden cameras throughout the City
Revised					
1-D	Local Cable		Supply information	Access to City Council TV is available on YouTube via the City's website at www.youtube.com/user/LawrenceCityCouncil/videos?flow=grid&live_view=500&sort=dd&view=0 . Videos of City Council meetings are updated as needed, and include hearings for the Stormwater Management & IDDE Ordinances. The City also maintains Twitter accounts (@COL1853, @Lawrence_H2O) and a Facebook page (www.facebook.com/LawrenceH2O) which has 106 "likes".	Continue to update City Council TV YouTube channel with videos of recent meetings; continue to update Twitter & Facebook accounts to reach residents via social media
Revised	City Web Site	IT Dept./Director			
1-E	Mailings	DPW/Director	Raise homeowners' awareness	The Water & Sewer Department made the 2014 Annual Drinking Water Quality Report available to residents in March 2015. This report includes water quality protection information and can be found electronically at www.cityoflawrence.com/water . Mayor Rivera began a bi-monthly newsletter, which is sent to interested members of the general public. Local non-profit agencies continue to provide information addressing quality of life issues.	Continue to include water resource protection information in annual drinking water quality reports Continue to issue bi-monthly newsletter to interested citizens
Revised					

1a. Additions

2. Public Involvement and Participation

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 12 (Reliance on non-municipal partners indicated, if any)	Planned Activities
2-A	Community Hot Line		Increase public participation	Hidden cameras and increased public input via walk-ins and calls to City Hall have resulted in an increase in enforcement actions related to littering and illegal dumping.	Continue to maintain hidden cameras throughout the City
Revised	Inspectional Services	Insp. Services/ Director			
2-B	Neighborhood Meetings	DPW/Director	Inform and interact	Neighborhood meetings provide opportunities for public involvement and participation in the implementation of the City's Stormwater Management Program.	Continue to support and attend neighborhood meetings
Revised				Public notification is done when required by law (e.g. public hearings, abutter notification).	
Revised					
Revised					
Revised					
Revised					

2a. Additions

3. Illicit Discharge Detection and Elimination

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 12 (Reliance on non-municipal partners indicated, if any)	Planned Activities
3-A Revised	Mapping Outfalls	DPW/Director	Locate illegal discharge	The City retained Woodard & Curran (W&C) to update and maintain the City's GIS database. As part of W&C's contract, a low altitude aerial survey of the City was completed in the fall of 2014 to gather orthography and key planimetric features (catch basins, manholes, etc.) to improve the existing storm sewer system map.	Continue to update and maintain the City's GIS database with accurate drainage information
3-B Revised	Illicit Discharge	Water & Sewer Dept./Commissioner	Identify origin of discharge	The City's 21 primary MS4 outfalls were GPS-located and screened in dry- and wet-weather between June and October of 2014. Screening results were used to rank outfalls for investigation priority. The City and W&C developed an IDDE Program Manual in December of 2014. The City and W&C are currently implementing the IDDE Program, which includes outfall and interconnection screening and sampling as well as systematic catchment investigations to identify illicit discharges in Problem Catchments.	Continue dry- and wet-weather screening of all MS4 outfalls and interconnections, and update priority ranking as needed Complete systematic catchment investigations of five (5) Problem Catchments Continue to implement the City's IDDE Program Manual
3-C Revised	Ordinance Development	City Council	Reduce illegal dumping	The City Council voted to implement an IDDE Ordinance in March 17, 2015, prohibiting non-stormwater discharge into the City's MS4.	Develop stormwater regulations to support implementation of IDDE Ordinance

3a. Additions

4. Construction Site Stormwater Runoff Control

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 12 (Reliance on non-municipal partners indicated, if any)	Planned Activities
4-A	Site Plan Review	Engineering Dept./City Engineer	Improve runoff quality	The City and W&C developed a Construction Site Erosion and Sediment Control (ESC) Program Manual in March 2015.	Continue to implement the City's Construction Site ESC Program Manual, including site plan review and construction inspections
Revised				Construction sites permitted under EPA's CGP were inspected in March 2015 for active construction and site stabilization measures.	
4-B	Runoff Ordinance	City Council	Reduce site runoff	The City Council voted to implement a Stormwater and Erosion Control Ordinance in March 17, 2015, requiring certain developers to obtain a Stormwater Management Permit from the City.	Develop stormwater regulations to support implementation of Stormwater and Erosion Control Ordinance
Revised					
Revised					
Revised					
Revised					

4a. Additions

5. Post-Construction Stormwater Management in New Development and Redevelopment

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 12 (Reliance on non-municipal partners indicated, if any)	Planned Activities
5-A	Design Standards	Engineering Dept./City Engineer	Plans include treatment or recharge	As per the City's Construction Site ESC Program and Stormwater and Erosion Control Ordinance, the City requires developers to meet Massachusetts Stormwater Handbook design standards and associated long-term operations and maintenance obligations for stormwater management systems.	Continue to require developers to meet Massachusetts Stormwater Handbook design standards
Revised					
5-B	Final Inspection	Insp. Services/Director	Compliance with plans	The City's Construction Site ESC Program and Stormwater and Erosion Control Ordinance requires developers to develop long-term operations and maintenance (O&M) plans to ensure stormwater management systems function as designed. The City has retained W&C to conduct final inspections of post-construction stormwater BMPs to document whether final conditions agree with site plan.	Continue to require developers to prepare long-term O&M plans Conduct final inspections of post-construction stormwater BMPs
Revised					
Revised					
Revised					

5a. Additions

6. Pollution Prevention and Good Housekeeping in Municipal Operations

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 12 (Reliance on non-municipal partners indicated, if any)	Planned Activities
6-A	Employee Training	DPW/Director	Educate employees	New employees are trained in the proper handling and disposal of hazardous materials. Additional employee training is conducted on an as-needed basis.	Continue to train employees and focus specifically on stormwater pollution prevention, IDDE, and other stormwater topics
Revised					
6-B	Catch Basin Cleaning	DPW/Director	Improve system functioning	City crews conduct catch basin cleaning daily as time allows, except during the winter months.	Continue to conduct catch basin cleaning on a regular basis
Revised					
6-C	Street Sweeping	DPW/Director	Reduce load to system	The City hires a contractor to sweep the entire City in the spring. City crews sweep streets daily as time allows, except during the winter months.	Continue to sweep streets on a regular basis
Revised					
Revised					
Revised					
Revised					

6a. Additions

7. BMPs for Meeting Total Maximum Daily Load (TMDL) Waste Load Allocations (WLA) <<if applicable>>

The Merrimack River, Spicket River, and Shawsheen River are all listed as Category 5 impaired waterways in the Massachusetts Year 2012 Integrated List of Waters, and the Shawsheen River Basin has an approved Bacteria TMDL. The City will continue to address the discharge of pollutants to these impaired waterways with the efforts described above. Catchments that discharge directly to the Shawsheen River have been prioritized for systematic illicit discharge investigations to reduce the discharge of fecal coliform into the TMDL-impaired waterway.

Part IV. Summary of Information Collected and Analyzed

Results of outfall dry- and wet-weather sampling have been incorporated into the City's IDDE Program Manual, and are available for review at the Water and Sewer Department (City Hall, Room 204).