

**Municipality/Organization:** City of Leominster, MA

**EPA NPDES Permit Number:** MAR041203

**MassDEP Transmittal Number:** W-041009

**Annual Report Number  
& Reporting Period:** Year 15  
April 1, 2017 – March 31, 2018

## 1. NPDES PII Small MS4 General Permit Annual Report (Due: May 1, 2018)

### Part I. General Information

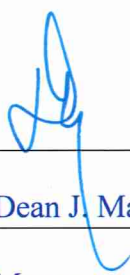
**Contact Person:** Mayor Dean J. Mazzarella **Title:** Mayor

**Telephone #:** 978-534-7500 **Email:** dmazzarella@leominster-ma.gov

**Mailing Address:** City Hall, 25 West Street, Leominster, MA 01453

#### 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:** Dean J. Mazzarella

**Title:** Mayor

**Date:** 4-6-18

## **Part II. Self-Assessment**

During Permit Year 15, the City continued to implement stormwater management consistent with the 2003 MS4 General Permit and has achieved nearly all of the measurable goals for the selected BMPs.

The City would like to highlight the following program accomplishments:

- The City continued to prepare for the upcoming 2016 MS4 permit obligations. The City has evaluated anticipated action items and associated deadlines. In response to the anticipated and increasing permit requirements, the City hired a new Stormwater Coordinator in Permit Year (PY) 15 to assist in future management of the MS4 compliance program.
- Residents of Leominster have the opportunity to participate in a number of City sponsored events with the environment and clean waters in mind, such as the Annual Monoosnoc Brook Clean-up, Annual City-wide Cleanup, Annual Recycling Event, and free workshops at the Leominster Public Library.
- The City has been successful at leveraging local and grant funding to support implementation of green infrastructure on municipal facilities and private property including the Granite Street Stormwater Demonstration Park, municipal roadway green infrastructure installations, the Gateway Project which includes porous pavement demonstration, and the Monoosnoc Brook Walk. In addition, the 2015 Adams/Cotton Street project included the installation of (2) 1500 Gallon Stormwater Detention Vaults, a BioSwale/Recharge Trench, and a Treebox for improved stormwater infiltration.
- Leominster continues to update its stormwater management system tracking database and continues to identify, inspect and maintain its municipally-owned stormwater control systems.
- Improvements to the City's winter operations program have been implemented and continue to provide value. Automatic Vehicle Locators are installed in all trucks, and ground speed controls are calibrated for more optimal operation.
- All existing City-owned sediment separator stormwater management systems were cleaned in 2017, as well as over 7,200 catch basins.
- The City completed a storm sewer replacement project in 2017. This project included the installation of approximately 1,300 feet of new storm sewer on Mill Street.

### Part III. Summary of Minimum Control Measures

#### 1. Public Education and Outreach

| <b>BMP ID #</b> | <b>BMP Description</b>                             | <b>Responsible Dept./Person Name</b> | <b>Measurable Goal(s)</b>                             | <b>Progress on Goal(s) – Permit Year 15</b><br>(Reliance on non-municipal partners indicated, if any)                                                                                                                                                                                                                                                                                                                                                                                                                | <b>Planned Activities</b>                                                               |
|-----------------|----------------------------------------------------|--------------------------------------|-------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------|
| 1.1             | Educational Signage at High-use Recreational Areas | Recreation & Conservation            | Install signage at watershed trail areas and dog park | BMP complete. The City continues to maintain all posted signs as needed. In May 2005, a total of 36 new signs were installed. During Permit Year 10, 10 new Conservation Signs were added at new locations (Sholan Farms, Wachusett St., Hill St., Barrett Park, and Prospect Park) for a total of 46 maintained signs. New signs for dog walkers were added at Barrett Park and Sholan Farms. New Conservation signs were installed on new businesses when required. Leominster does not currently have a dog park. | Measurable goals for the 2003 General Permit have been met. Continue to maintain signs. |
| Revised         |                                                    |                                      |                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                         |
| 1.2             | General Education Brochure                         | DPW Engineering                      | Develop and distribute mass mailing in water bills    | BMP complete. No activities were planned for Permit Year 15. Stormwater educational brochures, based on EPA's educational materials, were distributed in previous Permit Years and are readily available at the City Hall.                                                                                                                                                                                                                                                                                           | Measurable goals for the 2003 General Permit have been met.                             |
| Revised         |                                                    |                                      |                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                         |

| BMP ID # | BMP Description                             | Responsible Dept./Person Name           | Measurable Goal(s)                | Progress on Goal(s) – Permit Year 15<br>(Reliance on non-municipal partners indicated, if any)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Planned Activities                                                                                                                                                                                     |
|----------|---------------------------------------------|-----------------------------------------|-----------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|          | Lawn Care and Pet Waste Brochure and Survey | Engineering and Conservation Commission | Continue public education efforts | <p>Stormwater educational fact sheets and displays continue to be displayed at the library and City Hall, outside of the Building Department office. This display was sponsored by the Leominster Public Library and the Massachusetts Watershed Coalition. The information targets residents, developers, businesses, and other institutions in Leominster. Fact Sheets include:</p> <ul style="list-style-type: none"> <li>• <i>Is Your Lawn Care Stormwater-Friendly?</i></li> <li>• <i>Making Auto Care Stormwater-Friendly</i></li> <li>• <i>Pet Waste and Water Quality</i></li> <li>• <i>Example Rain Garden Illustration</i></li> <li>• <i>Reducing Pavement &amp; Permeable Paving Options</i></li> <li>• <i>Using Rock-filled Trenches</i></li> <li>• <i>Vegetated Swales</i></li> <li>• <i>Fertilizers &amp; Water Quality</i></li> </ul> <p>Information on saving water outdoors is available at:<br/> <a href="http://www.leominster-ma.gov/depts/safety/pw/water/tips.asp">http://www.leominster-ma.gov/depts/safety/pw/water/tips.asp</a></p> <p>A Guide for Landowners &amp; Landscapers is available at:<br/> <a href="http://www.leominster-ma.gov/gov/boardcomm/conservation/stormwater/guide.asp">http://www.leominster-ma.gov/gov/boardcomm/conservation/stormwater/guide.asp</a></p> | <p>Measurable goals for the 2003 General Permit have been met.</p> <p>Continue to work with the Massachusetts Watershed Coalition to provide stormwater informational materials at City buildings.</p> |
| Revised  | Healthy Lawn Workshop                       | DPW & MassDEP                           | Broadcast on local cable TV       | <p>The City and the Massachusetts Watershed Coalition hosted MassDEP's <i>Healthy Landscaping &amp; Lawn Care Workshop</i> on June 7, 2011 at the Leominster Public Library.</p> <p>On October 19, 2015, the Massachusetts Watershed Coalition and Ecological Landscape Alliance hosted a "eco-tour" of Leominster raingardens and other stormwater management facilities. Attendees had the opportunity to learn about raingarden function, installation and integration into landscape. Maps of the walking tour are found here:<br/> <a href="http://www.ecolandscaping.org/wp-content/uploads/2015/05/MB-BMP-sites-walking-tour-map-081815.jpg">http://www.ecolandscaping.org/wp-content/uploads/2015/05/MB-BMP-sites-walking-tour-map-081815.jpg</a></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | <p>Measurable goals for the 2003 General Permit have been met.</p> <p>The City will consider hosting additional free workshops related to stormwater and nonpoint source pollution.</p>                |

| <b>BMP ID #</b> | <b>BMP Description</b>                         | <b>Responsible Dept./Person Name</b> | <b>Measurable Goal(s)</b>                      | <b>Progress on Goal(s) – Permit Year 15</b><br>(Reliance on non-municipal partners indicated, if any)                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | <b>Planned Activities</b>                                                                                                                                                       |
|-----------------|------------------------------------------------|--------------------------------------|------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1.3<br>Revised  | Stormwater Curriculum for Grades 5 & 6         | Conservation & School Dept.          | No measurable goals planned for Permit Year 13 | <p>Fall Brook Elementary School students, working with the Massachusetts Watershed Coalition, installed a rain garden at the school in May 2009. The City continues to provide support and guidance to the Fall Brook Rain Garden Project.</p> <p>The City collaborates with Nashua River Watershed Association and local teachers to support implementation of award-winning stormwater program curriculum.</p> <p>A stormwater educational kiosk can be found at the City Hall.</p>                                                                                               | Measurable goals for the 2003 General Permit have been met. The City is working collaboratively with the School Department to develop a stormwater curriculum for Grades 5 & 6. |
| Revised         | Stormwater Runoff Public Service Announcements | Conservation & DPW                   | Reach as many households as possible           | <p>During Permit Year 9, the City hosted a presentation by Ed Himlan of the Massachusetts Watershed Coalition titled, <i>Creating a Rain Garden for Your Home</i> on April 7, 2011 at the Leominster Public Library. A video of this free workshop is available to watch anytime on the LATV website under “Media on Demand.”</p> <p>The City obtained EPA’s new free stormwater DVD, <i>Reduce Runoff: Slow it Down, Spread it out, Soak it in!</i> In previous permit years, it aired on LATV once per quarter. Copies of the DVD are available at City Hall and the library.</p> | Measurable goals for the 2003 General Permit have been met.                                                                                                                     |
| Revised         | Pet Waste PSA and Brochure                     | Conservation & DPW                   | Reach local residents                          | <p>In previous permit years, a Pet Waste brochure was provided to all licensed dog owners. The City continued to distribute the brochure during Permit Year 15.</p> <p>The City continues to provide educational materials on Pet Waste at City buildings, maintain pet waste stations at public parks, and enforces City Code regarding proper pet waste disposal.</p>                                                                                                                                                                                                             | Measurable goals for the 2003 General Permit have been met. Continue pet waste outreach efforts.                                                                                |

| <b>BMP ID #</b> | <b>BMP Description</b>     | <b>Responsible Dept./Person Name</b> | <b>Measurable Goal(s)</b>                              | <b>Progress on Goal(s) – Permit Year 15</b><br>(Reliance on non-municipal partners indicated, if any)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | <b>Planned Activities</b>                                                                                                                                                                                          |
|-----------------|----------------------------|--------------------------------------|--------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1.8             | Develop Stormwater Website | ConCom & DPW                         | Add stormwater page to existing web site by Spring '05 | <p>Information regarding stormwater management is available on City websites. For example, the DPW Annual Reports, which include stormwater and drainage activities, can be downloaded on the City website (<a href="http://www.leominster-ma.gov/">http://www.leominster-ma.gov/</a>).</p> <p>The Leominster Conservation Commission hosts a webpage for homeowners about raingardens. <a href="http://www.leominster-ma.gov/gov/boardcomm/conservation/involve/rain.asp">http://www.leominster-ma.gov/gov/boardcomm/conservation/involve/rain.asp</a></p> <p>This webpage also has a link to Citywide stormwater management facilities.</p> <p>Stormwater related PSAs are available to watch anytime on the LATV website under “Media on Demand” (see BMPs 1.2 and 1.3).</p> <p>The Leominster Stormwater Committee webpage provides information on stormwater: <a href="http://www.leominster-ma.gov/gov/boardcomm/stormwater/default.asp">http://www.leominster-ma.gov/gov/boardcomm/stormwater/default.asp</a></p> | <p>The City plans to improve the DPW and/or Conservation Commission pages to include information more specific to the “Small MS4” General Permit program.</p> <p>A stormwater website continues to be updated.</p> |
| Revised         |                            |                                      |                                                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                    |

## 2. Public Involvement and Participation

| BMP ID # | BMP Description               | Responsible Dept./Person Name | Measurable Goal(s)                                                                                                               | Progress on Goal(s) – Permit Year 15<br>(Reliance on non-municipal partners indicated, if any)                                                                                                                                                                                                          | Planned Activities                                                                                                                                                                                                                                           |
|----------|-------------------------------|-------------------------------|----------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 2.1      | Stormwater Advisory Committee | Public Works & ConCom         | Establish Committee by Fall '03, etc.                                                                                            | The Stormwater Advisory Committee includes City staff from Public Works, Conservation, and Health Departments.                                                                                                                                                                                          | Measurable goals for the 2003 General Permit have been met.                                                                                                                                                                                                  |
| Revised  |                               |                               |                                                                                                                                  | The committee meets on an as needed basis. The Stormwater Advisory Committee will continue to communicate and meet as needed to discuss stormwater management activities, preparation for the reissued MS4 General Permit and conducted a Stormwater Management/MS4 Program training refresher in 2015. |                                                                                                                                                                                                                                                              |
| 2.2      | Public Meetings on SWMP       | SW Advisory Committee         | Host annual public meetings each fall, beginning November 2005                                                                   | In 2015, the City hosted educational workshops for the general public on stormwater issues presented by the Massachusetts Watershed Coalition and MassDEP. Please refer to BMPs 1.2 and 1.3.                                                                                                            | Measurable goals for the 2003 General Permit have been met. The Stormwater Advisory Committee plans to solicit public comment during development of a new Notice of Intent and Stormwater Management Plan.                                                   |
| Revised  |                               |                               |                                                                                                                                  |                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                              |
| 2.3      | Shoreline Clean-ups           | Public Works & ConCom         | Expand annual Monoosnoc Brook cleanup. Remove trees along the north side of the brook through partnership with Mosquito Control. | A City project to clear Monoosnoc Brook for flood control (through a partnership with Mosquito Control) was completed in a previous permit year.<br><br>The annual City-wide City Cleanup took place April 22 through May 5, 2017.                                                                      | Continue to support community stewardship for the Monoosnoc Brook watershed through the Nashua River Watershed Association's <i>Monoosnoc Brook Greenway Project</i> (MBGP) and the Massachusetts Watershed Coalition's <i>Monoosnoc Brook Rescue Plan</i> . |
| Revised  |                               |                               |                                                                                                                                  |                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                              |

| <b>BMP ID #</b> | <b>BMP Description</b>                | <b>Responsible Dept./Person Name</b> | <b>Measurable Goal(s)</b>                                      | <b>Progress on Goal(s) – Permit Year 15</b><br>(Reliance on non-municipal partners indicated, if any)                                                                                                                                                                                                                                                                                                                                                                                                                                                     | <b>Planned Activities</b>                                                                                                                                      |
|-----------------|---------------------------------------|--------------------------------------|----------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 2.4             | Catch Basin Stenciling                | Public Works                         | Stencil priority basins by Fall 2004. Will inspect March 2007. | There was no storm drain stenciling completed in 2017.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | <p>Measurable goals for the 2003 General Permit have been met.</p> <p>The City will consider additional storm drain stenciling in 2018 as resources allow.</p> |
| Revised         |                                       |                                      |                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                                                |
| 2.5             | HHW and Electronics Collection Events | Public Works                         | Host 4 annual HHW collection events                            | <p>Measurable goal met. In Permit Year 15, continues to hold Hazardous Waste and Electronics collection events for citizens of Leominster. A HHW day occurred on August 26, 2017.</p> <p>The City holds a Spring and Fall Recycling Event, collecting items such as electronics, motor oil, and drugs. The Health Department has collection boxes for used syringes, batteries and ink cartridges. A new drug and battery disposal kiosk has been placed in the Police Department for public use.</p> <p>The City provides a drug drop-off box at the</p> | Continue to provide information on proper disposal of all rubbish to discourage illegal dumping.                                                               |



| <b>BMP ID #</b> | <b>BMP Description</b> | <b>Responsible Dept./Person Name</b> | <b>Measurable Goal(s)</b> | <b>Progress on Goal(s) – Permit Year 15</b><br>(Reliance on non-municipal partners indicated, if any)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | <b>Planned Activities</b> |
|-----------------|------------------------|--------------------------------------|---------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|
| Revised         |                        |                                      |                           | <p>Leominster Police Station to promote the proper disposal of pharmaceuticals.</p> <p>The City conducted fall leaf and yard waste pickup for City residents between the dates of Oct. 2 – Nov. 25, 2017.<br/> <a href="http://www.leominster-ma.gov/depts/safety/health/recycle/curbside/yard.asp">http://www.leominster-ma.gov/depts/safety/health/recycle/curbside/yard.asp</a></p> <p>The City provides detailed information on the Health Department’s web page<br/> <a href="http://www.leominster-ma.gov/depts/safety/health/recycle/default.asp">http://www.leominster-ma.gov/depts/safety/health/recycle/default.asp</a> ) regarding how, where, and the cost of disposal for almost any household item (from yard waste to bulk items to construction and demolition materials).</p> |                           |

### 3. Illicit Discharge Detection and Elimination

| BMP ID # | BMP Description                              | Responsible Dept./Person Name | Measurable Goal(s)                    | Progress on Goal(s) – Permit Year 15<br>(Reliance on non-municipal partners indicated, if any)                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Planned Activities                                                                                                 |
|----------|----------------------------------------------|-------------------------------|---------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------|
| 3.1      | Identify & Map Outfalls and Receiving Waters | Engineering                   | Map all outfalls in GIS by Spring '05 | Measurable goal met. The City has completed GIS outfall mapping that includes receiving waters, and has identified 450 outfalls. The City continues to document which outfalls are City-owned. So far, a total of 322 outfalls have been identified as City-owned and in the urbanized area. Pipe connectivity is being confirmed in drainage problem areas, during capital improvement projects and during catch basin cleaning. These updates are incorporated into GIS.                                                                                           | Measurable goals for the 2003 General Permit have been met. Continue to improve drainage mapping as budget allows. |
| Revised  |                                              |                               |                                       | <p>Priority catchments were identified in PY13 related to potential risk for illicit discharges. This preliminary prioritization was a part of the refinement of the written IDDE Program Manual.</p> <p>Additionally, the City continues to map and track city-owned stormwater control systems. See weblink here:<br/> <a href="https://www.google.com/maps/d/viewer?mid=zsMHR76jcDAA.k0ubdw_H-xEQ">https://www.google.com/maps/d/viewer?mid=zsMHR76jcDAA.k0ubdw_H-xEQ</a></p> <p>MassDOT performed an Impaired Waters Assessment for Monoosnoc Brook in 2015.</p> |                                                                                                                    |
| 3.2      | Screen Outfalls for Illicit Connections      | Public Works                  | Screen all outfalls by Spring '05     | Public Works and the Massachusetts Watershed Coalition have performed in-stream monitoring at priority areas (North Nashua River, Monoosnoc Brook) in wet and dry weather.                                                                                                                                                                                                                                                                                                                                                                                           | The City has refined its outfall screening protocol and                                                            |

| BMP ID # | BMP Description | Responsible Dept./Person Name | Measurable Goal(s) | Progress on Goal(s) – Permit Year 15<br>(Reliance on non-municipal partners indicated, if any)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Planned Activities                                |
|----------|-----------------|-------------------------------|--------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------|
| Revised  |                 |                               |                    | <p>Opportunistic visual inspections are done during catch basin cleaning. Employees are trained on opportunistic inspections for illicit cross-connections.</p> <p>In Permit Year 13, the City’s current IDDE program was reviewed, refined and updated into a written Program Manual. The Program Manual outlines regulatory authority, screening, investigation and elimination workflow processes and identifies priority catchments. A key component of Leominster’s IDDE program, is the use of opportunistic inspections as a method to identify illicit discharges. A SOP for opportunistic inspections was refined and developed as a part of the development of the IDDE Program Manual. On December 3, 2015, 45 City of Leominster employees were introduced to the City IDDE Program and trained on the fundamentals of illicit discharges, how to identify an illicit discharge, and the SOP for opportunistic inspections.</p> <p>The Nashua River Watershed Association, in cooperation with Leominster, conducts water quality sampling at three locations along the Monoosnoc Brook as well as the North Nashua River. Sampling parameters included E. coli, temperature, dissolved oxygen, and conductivity. The City additionally completed independent screening of these locations in April through October.</p> <p>The Health Department reviews all submitted Title V septic system inspection reports to ensure compliance and prevent pollution. All complaints related to sewage odors or discharges are investigated. All proposed septic system design plans are reviewed and inspections are performed during construction activities.<br/> <a href="http://www.leominster-ma.gov/depts/safety/health/title_v_septic_systems.asp">http://www.leominster-ma.gov/depts/safety/health/title_v_septic_systems.asp</a></p> <p>In PY 15, the City, through its inspection program, discovered an illicit connection which required the separation of a sewer pipe from a storm drain manhole. This illegal connection was disconnected within 30 days of notification to the owner.</p> | anticipates initiating this program in 2018-2019. |

| <b>BMP ID #</b> | <b>BMP Description</b>                 | <b>Responsible Dept./Person Name</b> | <b>Measurable Goal(s)</b>               | <b>Progress on Goal(s) – Permit Year 15</b><br>(Reliance on non-municipal partners indicated, if any)                                                                                                                                                                                                                                                                                          | <b>Planned Activities</b>                                                                                                                                                                                                           |
|-----------------|----------------------------------------|--------------------------------------|-----------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 3.3             | Draft Illicit Connection Bylaw         | Engineering & ConCom                 | Submit to City Council Spring '04       | BMP complete. The City amended their Municipal Code of Ordinances on March 28, 2005. <i>Article V. Illicit Connections and Discharges to the Storm Drain System</i> was added to Chapter 21 – Water & Sewers, which prohibits illicit discharges to the MS4 and City waters, illicit connections, and obstructions of the drainage system.                                                     | Measurable goals for the 2003 General Permit have been met.                                                                                                                                                                         |
| Revised         |                                        |                                      |                                         |                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                                                                                                                     |
| 3.4             | Revise Sewer and Drain Use Regulations | Engineering                          | Revise and adopt with new Illicit bylaw | See BMP 3.3 above.<br><br>The City staff that clean the City's catch basins report violations of the City Code regarding improper pet waste disposal or other illicit discharges to the Director of Public Works and tracks potential illegal dumping on the catch basin cleaning form.<br><br>The City continues to identify possible illegal dumping through its catch basin cleaning forms. | Measurable goals for the 2003 General Permit have been met.<br><br>Continue to enforce the Municipal Code of Ordinances Chapter 6 <i>Dogs</i> § 6-8. <i>Pet waste disposal</i> to the extent possible based on observed violations. |
| Revised         |                                        |                                      |                                         |                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                                                                                                                     |

#### 4. Construction Site Stormwater Runoff Control

| BMP ID # | BMP Description                                               | Responsible Dept./Person Name    | Measurable Goal(s)                                                                    | Progress on Goal(s) – Permit Year 15<br>(Reliance on non-municipal partners indicated, if any)                                                                                                                                                                            | Planned Activities                                          |
|----------|---------------------------------------------------------------|----------------------------------|---------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------|
| 4.1      | Construction Site ESC Bylaw and Regulations for Sites >1-Acre | Con Com, Public Works            | Review existing mechanisms for adequacy and completeness by Spring '05, etc.          | The City of Leominster passed the Stormwater and Erosion Control Ordinance in Chapter 21 of the City Code on July 14, 2014 which went into effect on January 1, 2015. The Stormwater Committee provided outreach to businesses about the new ordinance in late fall 2014. | Measurable goals for the 2003 General Permit have been met. |
| Revised  |                                                               |                                  |                                                                                       |                                                                                                                                                                                                                                                                           |                                                             |
| 4.2      | Site Plan Review                                              | Planning, Building & Engineering | Incorporated into Development Review Board process with appropriate ordinance changes | Improved construction site runoff control procedure review requirements are included in the Stormwater and Erosion Control Ordinance and Regulations developed thereunder.                                                                                                | Measurable goals for the 2003 General Permit have been met. |
| Revised  |                                                               |                                  |                                                                                       | In 2017, there were 11 stormwater permit application reviews conducted under the new stormwater management permit application. Applications are required to be reviewed and signed by the City's engineering department.                                                  |                                                             |
| 4.3      | Site Inspections                                              | Health Dept. & ConCom            | Implement new site inspection process for Spring '07                                  | The Health Inspector and/or the Conservation Agent/Environmental Inspector conduct inspections of ongoing construction projects throughout the City.                                                                                                                      | Measurable goals for the 2003 General Permit have been met. |
| Revised  |                                                               |                                  |                                                                                       |                                                                                                                                                                                                                                                                           | Continue construction site inspections by City personnel.   |

| <b>BMP ID #</b> | <b>BMP Description</b>                              | <b>Responsible Dept./Person Name</b> | <b>Measurable Goal(s)</b>                                          | <b>Progress on Goal(s) – Permit Year 15</b><br>(Reliance on non-municipal partners indicated, if any)                                                                                                                                                                                                                                                                                                                       | <b>Planned Activities</b>                                   |
|-----------------|-----------------------------------------------------|--------------------------------------|--------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------|
| 4.4             | Establish System to Report Non-compliant Activities | Con Com                              | Establish during 2004 construction season & use web site reporting | The Conservation Agent has taken the lead in conducting inspections of construction sites. The Conservation Agent receives calls and complaints from the public, which are reported, along with any action taken, to the Conservation Commission in the Agent's monthly reports.                                                                                                                                            | Measurable goals for the 2003 General Permit have been met. |
| Revised         |                                                     |                                      |                                                                    | In addition, the City purchased SeeClickFix platform and launched it on the City website in March 2017. The platform is accessible to all residents on the City homepage: <a href="http://www.leominster-ma.gov/">http://www.leominster-ma.gov/</a> . Residents are now able to submit a report regarding issues such as illegal dumping, and a City staff member responds and closes out the report after it is addressed. |                                                             |

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

| <b>BMP ID #</b> | <b>BMP Description</b>                                            | <b>Responsible Dept./Person Name</b> | <b>Measurable Goal(s)</b>                                      | <b>Progress on Goal(s) – Permit Year 15</b><br>(Reliance on non-municipal partners indicated, if any)                                                                                                                                                                              | <b>Planned Activities</b>                                   |
|-----------------|-------------------------------------------------------------------|--------------------------------------|----------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------|
| 5.1             | Stormwater Management Ordinance and Regulations for Sites >1-Acre | Con Com                              | Research and/or revise existing ordinances to comply with SWMP | The City of Leominster passed the Stormwater and Erosion Control Ordinance in Chapter 21 of the City Code on July 14, 2014. The Stormwater Committee provided outreach to businesses about the new ordinance in late fall 2014. The ordinance went into effect on January 1, 2015. | Measurable goals for the 2003 General Permit have been met. |
| Revised         |                                                                   |                                      |                                                                |                                                                                                                                                                                                                                                                                    |                                                             |

## 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 15<br>(Reliance on non-municipal partners indicated, if any)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Planned Activities                                                                                                                                                                                         |
|----------|-------------------|-------------------------------|--------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 6.1      | Employee Training | Public Works                  | Conduct stormwater training each winter                                                                                  | During Permit Year 12, City staff involved with the Stormwater Committee were trained on MS4 compliance and basic stormwater practices on April 17, 2015.<br><br>In 2015, City staff were introduced to Leominster's updated IDDE Program Manual and Standard Operating Procedures for opportunistic inspections.<br><br>Staff from the Stormwater Committee continues to receive hands-on training from the Massachusetts Watershed Coalition through training and public presentations.<br><br>In 2017, DPW staff attended trainings on Septic Inspections, NASSCO, Trench Safety, and Haz-Mat. | Measurable goals for the 2003 General Permit have been met.<br><br>Continue to identify training workshops for Stormwater Advisory Committee members and City staff responsible for implementing the SWMP. |
| Revised  |                   |                               |                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                            |
| 6.2      | Street Sweeping   | Public Works                  | Sweep all City streets annually by June 30th and downtown areas once a week. Sweep outfall areas while doing main roads. | All City streets were swept by June 30, 2017 per permit requirements.<br><br>The City currently sweeps streets twice per year and three times per week downtown.                                                                                                                                                                                                                                                                                                                                                                                                                                  | Measurable goals for the 2003 General Permit have been met.<br><br>Continue the annual street sweeping program.                                                                                            |
| Revised  |                   |                               |                                                                                                                          | The City currently has a total of two street sweepers, however the City is in the process of purchasing a third street sweeper.                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                            |



| <b>BMP ID #</b> | <b>BMP Description</b>                      | <b>Responsible Dept./Person Name</b> | <b>Measurable Goal(s)</b>                                    | <b>Progress on Goal(s) – Permit Year 15</b><br>(Reliance on non-municipal partners indicated, if any)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | <b>Planned Activities</b>                                                                                                                                                                                                                                                         |
|-----------------|---------------------------------------------|--------------------------------------|--------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 6.3             | Predictive Catch Basin Cleaning Program     | Public Works                         | Clean all basins once per year (3600). Total costs per year. | The City cleaned 7,270 catch basins in Permit Year 15 and removed approximately 3,014 tons of material during catch basin cleaning operations.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Measurable goals for the 2003 General Permit have been met.                                                                                                                                                                                                                       |
| Revised         |                                             |                                      |                                                              | The City has a cooperative agreement with Clinton, MA for permitted disposal of catch basin residuals.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | The City will consider prioritization of the cleaning schedule to reach outfall areas and other sensitive areas first during development of the updated SWMP.                                                                                                                     |
| 6.4             | O&M Schedule for City Owned Structural BMPs | Engineering                          | Implement program by Spring '05                              | The City owns and operates a number of stormwater control systems throughout the City. Over the past several years the City has populated both public and private system data into GIS and currently has over 200 stormwater control systems mapped. Ownership attributing is ongoing and the City maintains an active maintenance program for City-owned systems as resources afford. O&M Plans for private BMPs were developed for compliance with local permits. For several city-owned green infrastructure BMPs, the City hires third party operation and maintenance. All City-owned sediment vaults were cleaned during PY 15 by City staff. | Measurable goals for the 2003 General Permit have been met with refinements to GIS ownership attributing and maintenance program schedules.<br><br>The City plans to formalize their O&M procedures for City-owned properties and infrastructure according to EPA's requirements. |

| <b>BMP ID #</b> | <b>BMP Description</b>                        | <b>Responsible Dept./Person Name</b> | <b>Measurable Goal(s)</b>                         | <b>Progress on Goal(s) – Permit Year 15</b><br>(Reliance on non-municipal partners indicated, if any)                                                                                                                                                                                                                                                                           | <b>Planned Activities</b>                                                                                |
|-----------------|-----------------------------------------------|--------------------------------------|---------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------|
| 6.5             | Vehicle Washing: Separate Garage Floor Drains | Public Works                         | Tie garage drains into sanitary sewer             | In prior permit years, the City determined that it was necessary to install an oil/water separator at the Public Works facility and redirect the floor drains to the sanitary sewer. All of the recommended work at the DPW garage has been completed, including retrofitting catch basins with hoods, eliminating floor drain sumps, and installing new drain and sewer lines. | BMP complete. Measurable goals for the 2003 General Permit have been met.                                |
| Revised         |                                               |                                      |                                                   |                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                          |
| 6.6             | Separate Combination Sewer/Drain Manholes     | Public Works                         | Separate when encountered                         | Completed all 500 separations by September 2011.                                                                                                                                                                                                                                                                                                                                | BMP complete. Measurable goals for the 2003 General Permit have been met.                                |
| Revised         |                                               |                                      |                                                   |                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                          |
| 6.7             | Repair Leaking Sewer Trunk Lines              | Public Works                         | Relined leaking sewer trunk line – Granite Street | The City continues to conduct sewer line repairs and pipe relining efforts.<br><br>In PY 15, several sewer manholes were repaired or replaced. Additionally, approximately 400 linear feet of sewer main was replaced on Pleasane Terrace.                                                                                                                                      | The Sewer Department will continue to repair and replace problematic sewer lines as budget is available. |
| Revised         |                                               |                                      |                                                   |                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                          |

## 7. BMPs for Meeting Total Maximum Daily Load (TMDL) Waste Load Allocations (WLA)

| BMP ID # | BMP Description                                | Responsible Dept./Person Name | Measurable Goal(s)                                       | Progress on Goal(s) – Permit Year 14<br>(Reliance on non-municipal partners indicated, if any)                                                                                                                                                                                  | Planned Activities                                                                                                                                                                                                                                                               |
|----------|------------------------------------------------|-------------------------------|----------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 7.1      | Check Current Impairment Lists and TMDL Status | Public Works                  | Annually review the current MA Integrated List of Waters | Reviewed the Proposed Massachusetts 2014 Integrated List of Waters and MassDEP TMDL website.                                                                                                                                                                                    | The TMDL and impairment status of receiving waters in Leominster's Urbanized Area will be reevaluated during development of the next NOI. The City will determine appropriate BMPs given the pollutants of concern and targeted land uses and activities in impaired watersheds. |
| Revised  |                                                |                               |                                                          | Monoosnoc Brook and the North Nashua River are listed as Category 5 waterbodies requiring development of a TMDL for E.Coli (pathogens) and biological impairments. A draft pathogen TMDL report is available for the Nashua River Watershed, which includes these water bodies. |                                                                                                                                                                                                                                                                                  |
| 7.2      | Bring Sanitary Sewer to Two Streets in 2007    | New England Development       | Finish in 2007                                           | Completed in September 2007.                                                                                                                                                                                                                                                    | BMP complete. Measurable goals for the 2003 General Permit have been met.                                                                                                                                                                                                        |
| Revised  |                                                |                               |                                                          |                                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                  |
| 7.3      | Street Sweeping Summer/Fall 2007               | Public Works                  | Increase sweeping to 3-4 times/yr. in watershed areas.   | BMP complete. See BMP 6.2.                                                                                                                                                                                                                                                      | The City plans to prioritize the sweeping schedule to reach watershed areas and other sensitive areas first, and to meet the obligations of the upcoming 2016 MS4 General Permit.                                                                                                |
| Revised  |                                                |                               |                                                          |                                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                  |

### 7b. WLA Assessment

At this time, there are no final TMDLs for discharges directly to receiving waters in Leominster's Urbanized Areas. The City will reevaluate the status of receiving waters under the revised General Permit and will consider adding BMPs to address pollutants of concern during development of the next NOI.