

**Year 6 Annual Report**  
**Massachusetts Small MS4 General Permit**  
**Reporting Period: July 1, 2023-June 30, 2024**

*\*\*Please DO NOT attach any documents to this form. Instead, attach all requested documents to an email when submitting the form. Also ensure any websites included on this form are to publicly accessible sites\*\**

*Unless otherwise noted, all fields are required to be filled out. If a field is left blank, it will be assumed the requirement or task has not been completed. Please ONLY report on activities between July 1, 2023 and June 30, 2024 unless otherwise requested.*

**Part I: Contact Information**

Name of Municipality or Organization: City of Leominster

EPA NPDES Permit Number: MAR041203

**Primary MS4 Program Manager Contact Information**

Name: Shawn Comeau

Title: Department of Public Works

Street Address Line 1: 109 Graham Street

Street Address Line 2:

City: Leominster

State: MA

Zip Code: 01453

Email: scomeau@dpw-leominster-ma.gov

Phone Number: (978) 534-7590

**Stormwater Management Program (SWMP) Information**

SWMP Location (publicly available web address): <https://www.leominster-ma.gov/DocumentCenter/View/931/Stormwater-Management-Program-Plan-PDF>

Date SWMP was Last Updated: 9/4/2018

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

## Part II: Self-Assessment

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

**Impairment(s)**

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

**TMDL(s)**

*In State:*

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

*Out of State:*

Bacteria/Pathogens     
  Metals     
  Nitrogen     
  Phosphorus

Clear Impairments and TMDLs

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

### Annual Requirements

- Provided an opportunity for public participation in review and implementation of SWMP and complied with State Public Notice requirements
- Kept records relating to the permit available for 5 years and made available to the public
- The SSO inventory has been updated, including the status of mitigation and corrective measures implemented
  - This is not applicable because we do not have sanitary sewer
  - This is not applicable because we did not find any new SSOs
  - The updated SSO inventory is attached to the email submission
  - The updated SSO inventory can be found at the following publicly available website:
- Updated system map due in year 10 with information from completed catchment investigations
- Provided training to employees involved in IDDE program within the reporting period
- Properly stored and disposed of catch basin cleanings and street sweepings so they did not discharge to receiving waters
- All curbed roadways were swept at least once within the reporting period
- Enclosed all road salt storage piles or facilities and implemented winter road maintenance procedures to minimize the use of road salt
- Implemented SWPPPs for all permittee owned or operated maintenance garages, public works yards, transfer stations, and other waste handling facilities

- Updated inventory of all permittee owned facilities as necessary
- O&M programs for all permittee owned facilities have been completed and updated as necessary
- Implemented all maintenance procedures for permittee owned facilities in accordance with O&M programs
- Implemented program for MS4 infrastructure maintenance to reduce the discharge of pollutants
- Inspected all permittee owned treatment structures (excluding catch basins)

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

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

Annual Requirements

*Public Education and Outreach\**

- Annual message was distributed encouraging the proper management of pet waste, including noting any existing ordinances where appropriate
- Permittee or its agents disseminated educational material to dog owners at the time of issuance or renewal of dog license, or other appropriate time
- Provided information to owners of septic systems about proper maintenance in any catchment that discharges to a water body impaired for bacteria

This is not applicable because there are no septic systems present

*\* Public education messages can be combined with other public education requirements as applicable (see Appendix H and F for more information)*

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

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

Annual Requirements

*Public Education and Outreach\**

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

*\* Public education messages can be combined with other public education requirements as applicable (see Appendix H and F for more information)*

*Good Housekeeping and Pollution Prevention for Permittee Owned Operations*

- Increased street sweeping frequency of all municipal owned streets and parking lots subject to Permit part 2.3.7.a.iii.(c) to a minimum of two times per year (spring and fall)

*Structural BMPs*

- Installed a structural BMP as a demonstration project within the drainage area of the water quality limited water or its tributaries. The type of BMP installed is (*e.g. biofiltration*):

\_\_\_\_\_

- Any structural BMPs already existing or installed in the regulated area by the permittee or its agents was tracked and the phosphorus removal by the BMP was estimated consistent with Attachment 3 to Appendix F. The BMP type, total area treated by the BMP, the design storage volume of the BMP, and the estimated phosphorus removed in mass per year by the BMP were documented.

- No BMPs were installed
- The above referenced BMP information is attached to the email submission
- The above referenced BMP information can be found at the following publicly available website:

\_\_\_\_\_

Total estimated phosphorus removed in **lbs/year** from the installed BMPs:

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

\_\_\_\_\_

**Solids, Oil and Grease (Hydrocarbons), or Metals**  
Annual Requirements

*Good Housekeeping and Pollution Prevention for Permittee Owned Operations*

- Increased street sweeping frequency of all municipal owned streets and parking lots to a schedule that targets areas with potential for high pollutant loads
  - The street sweeping schedule is attached to the email submission
  - The street sweeping schedule can be found at the following publicly available website:

<https://www.leominster-ma.gov/308/Highway>

- Prioritized inspection and maintenance for catch basins to ensure that no sump shall be more than 50 percent full; Cleaned catch basins more frequently if inspection and maintenance activities indicated excessive sediment or debris loadings

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

The street sweeping schedule is from the end of March through the end of November, weather permitting. We do not have a schedule to attach, the city streets are swept each year as necessary. See website listed above for Information on the city street programs.

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

The City of Leominster Department of Public Works continues it's program in which we inspect the storm drainage system infrastructure for illicit discharges, perform investigation to identify areas of possible contamination and then work to eliminate them.

### Part III: Receiving Waters/Impaired Waters/TMDL

Have you made any changes to your lists of receiving waters, outfalls, or impairments since the NOI was submitted?

- Yes
- No

If yes, describe below, including any relevant impairments or TMDLs:

Based on the "Final Massachusetts Integrated List of Waters for the Clean Water Act 2022 Reporting Cycle", no changes were made to the City's waterbody impairments.

## Part IV: Minimum Control Measures

Please fill out all of the metrics below. If applicable, include in the description who completed the task if completed by a third party.

### MCM1: Public Education

Number of educational messages completed during this reporting period: 5

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

#### **BMP:Timed/Targeted Message**

Message Description and Distribution Method:

The City's Conservation Commission has a "Stormwater And Water Pollution" page located on the City website. The page gives an overview of stormwater, provides information regarding stormwater runoff pollution that flows into drain systems and into waterbodies, and addresses the negative impacts that pet waste has to water quality. The page also includes links to dog waste educational resources that provide additional information on dog waste bacteria that gets washed up if not properly disposed of, proper disposal methods and how to handle dog waste in private and public properties. The Conservation Commission's Facebook page currently has 193 followers.

Targeted Audience: Residents, businesses, developers, industry

Responsible Department/Parties: Conservaton Office

Measurable Goal(s):

Post educational messages on the City's website and maintain education content throughout the permit term.

Message Date(s): On-going

Message Completed for: Appendix F Requirements  Appendix H Requirements

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

If yes, describe why the change was made:

#### **BMP:Supplemental Messages on Facebook**

Message Description and Distribution Method:

The City's DPW posts informational flyers as well as spreads awareness regarding stormwater related projects throughout the city on their Facebook Page, which currently has over 1,300 followers. The Department of Public Works consistently posts messages about illicit discharges to stormwater systems and installation of new stormwater systems.

Targeted Audience: All

Responsible Department/Parties: Department of Public Works

Measurable Goal(s):

Post educational messages on the City's social media and maintain educational contact throughout the Permit term. Also continuously update the storm drainage system infrastructure.

Message Date(s): On-going

Message Completed for: Appendix F Requirements  Appendix H Requirements

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

If yes, describe why the change was made:

**BMP:MS4 Booklets for Private Contractors**

Message Description and Distribution Method:

MS4 booklets were handed out to City approved private contractors as necessary.

Targeted Audience: Developers (construction)

Responsible Department/Parties: Department of Public Works

Measurable Goal(s):

Maintain educational content throughout the Permit term.

Message Date(s): On-going

Message Completed for: Appendix F Requirements  Appendix H Requirements

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

If yes, describe why the change was made:

**BMP:Supplemental Messaging for Dog Owners**

Message Description and Distribution Method:

32 catch basins were stenciled in neighborhoods with excessive dog waste in catch basins, and education material was distributed accordingly.

Targeted Audience: Residents/Dog Owners

Responsible Department/Parties: Department of Public Works

Measurable Goal(s):

Supplemental messaging for residents regarding dog waste disposal.

Message Date(s): On-going

Message Completed for: Appendix F Requirements  Appendix H Requirements

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

If yes, describe why the change was made:

**BMP: Community Nature Walks**

Message Description and Distribution Method:

The Conservation Commission has led 10 nature walks throughout the Permit Year, focused on ecology and the services they provide humans, such as stormwater and pollution management.

Targeted Audience: Residents

Responsible Department/Parties: Conservation Commission

Measurable Goal(s):

Maintain educational content throughout the Permit term.

Message Date(s): On-going

Message Completed for: Appendix F Requirements  Appendix H Requirements

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

If yes, describe why the change was made:

Add an Educational Message

**MCM2: Public Participation**

Describe the opportunity provided for public involvement in the development of the Stormwater Management Program (SWMP) during this reporting period:

The City of Leominster SWMP and NOI have been posted to the website. Updates to the SWMP, with new

impaired waters information has been developed and has been posted to the City's website.

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

Describe any other public involvement or participation opportunities conducted during this reporting period: Public involvement regarding stormwater management has been encouraged during Conservation Commission meetings and during the Municipal Vulnerability Program which is a grant program to assist in areas that require storm drainage system upgrades.

**MCM3: Illicit Discharge Detection and Elimination (IDDE)**

**Sanitary Sewer Overflows (SSOs)**

Check off the box below if the statement is true.

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

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

Number of SSOs identified:

Number of SSOs removed:

**MS4 System Mapping**

Percent of Phase II map complete:

Optional: Provide additional status information regarding your map:

The City will continue to update their Storm Sewer Map on GIS as needed to stay consistent with the City's operations program and meet permit requirements. Adjustments will be made to the map as new information is discovered after catch basin and storm sewer cleaning, catchment investigations, CCTV inspections and/or other field efforts are conducted.

**Screening of Outfalls/Interconnections**

If conducted, please submit any outfall monitoring results from this reporting period. Outfall monitoring results should include the date, outfall/interconnection identifier, location, weather conditions at time of sampling, precipitation in previous 48 hours, field screening parameter results, and results from all analyses. Please also include the updated inventory and ranking of outfalls/interconnections based on monitoring results.

- No outfalls were inspected
- The above referenced outfall screening data is attached to the email submission
- The above referenced outfall screening data can be found at the following publicly available website:

[Empty text box]

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

Number of outfalls screened:

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

Percent of outfalls screened:

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

All dry weather screenings have been performed, The Department of Public Works is working on the wet weather investigations.

**Catchment Investigations**

*If conducted, please submit all data collected during this reporting period as part of the dry and wet weather investigations. Also include the presence or absence of System Vulnerability Factors for each catchment.*

- No catchment investigations were conducted
- The catchment investigation data is attached to the email submission
- The catchment investigation data can be found at the following publicly available website:

[Empty text box]

*Below, report on the number of catchment investigations completed during this reporting period.*

Number of catchment investigations completed this reporting period:

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

Percent of total catchments investigated:

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

[Empty text box]

**IDDE Progress**

*If illicit discharges were found, please submit a document describing work conducted over this reporting period, and cumulative to date, including location source; description of the discharge; method of discovery; date of discovery; and date of elimination, mitigation, or enforcement OR planned corrective measures and schedule of removal.*

- No illicit discharges were found
- The illicit discharge removal report is attached to the email submission
- The illicit discharge removal report can be found at the following publicly available website:

[Empty text box]

*Below, report on the number of illicit discharges identified and removed, along with the volume of sewage removed during this reporting period.*

Number of illicit discharges identified:

Number of illicit discharges removed:

Estimated volume of sewage removed:  gallons/day

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

Total number of illicit discharges identified:

Total number of illicit discharges removed:

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

**Employee Training**

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

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

**MCM4: Construction Site Stormwater Runoff Control**

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

Number of site plan reviews completed:

Number of inspections completed:

Number of enforcement actions taken:

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

The City of Leominster Department of Public Works reviews all site plans submitted to the Planning Department. Also the Conservation Agent reviews all site plans submitted to the Conservation Commission. These plans are reviewed for compliance with the Massachusetts Stormwater Management Regulations. Inspections are completed by the engineer of record.

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

### **Ordinance or Regulatory Mechanism**

Date update was completed (due in year 3):

Website of ordinance or regulatory mechanism:

### **As-built Drawings**

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

Number of as-built drawings received:

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

### **Street Design and Parking Lots Report**

Below, describe any changes made or planned to be made to local regulations and guidelines based on the report completed in Year 4:

### **Green Infrastructure Report**

Below, describe progress towards making green infrastructure practices allowable based on the report completed in Year 4:

**Retrofit Properties Inventory**

Below, list remaining permittee-owned properties that could be modified or retrofitted with BMPs to mitigate impervious areas (must maintain a minimum of 5 sites in inventory until less than 5 sites remain):

Main Street Sidewalks  
Union Street Sidewalks  
Public Works Facility  
Municipal parking areas (Church Street, Mechanic Street, etc.)

Below, list all properties that have been modified or retrofitted with BMPs to mitigate impervious area that were inventoried as part of 2.3.6.d of the permit and the type of BMP(s) implemented. Non-MS4 owned properties that have been modified or retrofitted with BMPs to mitigate impervious area may also be listed, but must be indicated as non-MS4.

See attached list of all BMP's that are maintained.

**MCM6: Good Housekeeping**

**Catch Basin Cleaning**

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

Number of catch basins inspected: 2,642

Number of catch basins cleaned: 2,642

Total volume or mass of material removed from all catch basins: 1,108 tons

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

Total number of catch basins: 420

*If applicable:*

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

Catch basins were tracked to see if they were 50% full and cleaning activities have been increased. The total number of catch basins listed is an estimate.

**Street Sweeping**

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

Number of miles cleaned: 195

Volume of material removed: [ ] [Select Units]

Weight of material removed: [ ] [Select Units]

**Stormwater Pollution Prevention Plan (SWPPP)**

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

Number of site inspections completed: 8

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

All Municipal facilities are monitored each year.

**Additional Information**

**Monitoring or Study Results**

Results from any other stormwater or receiving water quality monitoring or studies conducted during the reporting period not otherwise mentioned above, where the data is being used to inform permit compliance or permit effectiveness must be attached.

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

[ ]

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

[ ]

**Additional Information**

*Optional:* Enter any additional information relevant to your stormwater management program implementation during the reporting period. Include any BMP modifications made by the MS4 if not already discussed above.

## Year 7

### Activities Planned for Next Reporting Period

Please confirm that your SWMP has been, or will be, updated to comply with all applicable permit requirements including but not limited to the year 7 requirements summarized below. (Note: impaired waters and TMDL requirements are not listed below)

Yes, I agree

- Complete investigations of catchments associated with Problem Outfalls
- Complete investigations of catchments where any information gathered on the outfall/interconnection identifies sewer input

### Annual Requirements

- Annual report submitted and available to the public
- Annual opportunity for public participation in review and implementation of SWMP
- Keep records relating to the permit available for 5 years and make available to the public
- Properly store and dispose of catch basin cleanings and street sweepings so they do not discharge to receiving waters
- Annual training to employees involved in IDDE program
- Update inventory of all known locations where SSOs have discharged to the MS4
- Continue public education and outreach program
- Update outfall and interconnection inventory and priority ranking and include data collected in connection with the dry weather screening and other relevant inspections conducted
- Implement IDDE program
- Review site plans of construction sites as part of the construction stormwater runoff control program
- Conduct site inspection of construction sites as necessary
- Inspect and maintain stormwater treatment structures
- Log catch basins cleaned or inspected
- Sweep all curbed streets at least annually
- Continue investigations of catchments associated with Problem Outfalls
- Implemented SWPPPs for all permittee owned or operated maintenance garages, public works yards, transfer stations, and other waste handling facilities
- Review inventory of all permittee owned facilities in the categories of parks and open space, buildings and facilities, and vehicles and equipment; update if necessary

- Review O&M programs for all permittee owned facilities; update if necessary
- Implement all maintenance procedures for permittee owned facilities in accordance with O&M programs
- Implement program for MS4 infrastructure maintenance to reduce the discharge of pollutants
- Enclose all road salt storage piles or facilities and implemented winter road maintenance procedures to minimize the use of road salt
- Review as-built drawings for new and redevelopment to ensure compliance with post construction bylaws, regulations, or regulatory mechanism consistent with permit requirements
- Inspect all permittee owned treatment structures (excluding catch basins)
- Identify additional permittee-owned properties that could potentially be modified or retrofitted with BMPs to reduce impervious areas so that the permittee maintains a minimum of 5 sites in their inventory, until such a time when the permittee has less than 5 sites remaining

Provide any additional details on activities planned for permit year 7 below:

The City of Leominster will continue to meet and/or exceed our annual requirements each year.

## Part V: Certification of Small MS4 Annual Report 2023

### 40 CFR 144.32(d) Certification

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


Name:

Mark F. Piermarini, P.E.

Title:

Asst. Director of Public Works

Signature:



Date:

09/23/24

*[Signatory may be a duly authorized representative]*