Washington County
MARYLAND

DIVISION OF
ENVIRONMENTAL MANAGEMENT
WATER QUALITY | SOLID WASTE | ENGINEERING SERVICES
STORMWATER & WATERSHED SERVICES

October 31, 2024

Ms. Deborah Cappuccitti
Senior Regulatory Compliance Engineer
Maryland Department of the Environment, Water and Science Administration
Sediment, Stormwater, and Dam Safety Program
1800 Washington Blvd, Suite 440
Baltimore, MD 21230-1708

Re: General Permit No. 13-IM-5500
General NPDES No. MDR 0555500
2024 Municipal Small MS4 Progress Report Year 6

Dear Ms. Cappucitti,

As required by the National Pollutant Discharge Elimination System General Permit for Discharges from Small Municipal Separate Storm Sewer Systems, General Discharge Permit No. 13-IM-5500, General NPDES No. MDR055500, Washington County's Division of Environmental Management is hereby providing to you the attached, 2023 Washington County Maryland, NPDES Municipal Small MS4 Year 6 Progress Report, for General Permit No. 13-IM-5500. We have also addressed comments made in MDEs review of our 2023 Year 5 Progress Report, which are attached as a separate document.

The Year 6 submission is in the format as required by the MS4 Permit and contains the completed forms from Appendix D Section I (Impervious Area Restoration Reporting) & Section II (Minimum Control Measures Reporting), with the updated Impervious Area Restoration Work Plan and updated Restoration Activity Schedule (RAS). All information provided has been reviewed for accuracy and is based on the best available information at the time of compilation. Staff has developed the list based on projects that we believe will meet the 20% requirement. The RAS will be adjusted as we proceed to plan and implement our restoration schedule. Each project has a "projected" implementation year (consistent with the language in the GP). We ask that MDE view the list in this context.

The County recognizes MDE's request to update the RAS to include an additional 10% restoration planning through 2030. Washington County staff will continue to evaluate the potential for future projects to meet the 2030 restoration goal. The County will continue to move forward with the projects listed on the RAS, but we must note the practicability of doing so. The County does not control outside permitting, nor can we force a private property owner to grant us an easement even if we need one for a project.

Consideration of the total cost and cost-effectiveness of any project when considering local clean water goals in addition to other local goals (education, emergency services, etc.), is paramount. Given the persistent inflationary strain on our citizens, the affordability of our stormwater programs, including the restoration requirement, is forefront in our decision-making. Should a proposed restoration project be deemed impracticable, costly, or otherwise ineffective, the County reserves the right to substitute a different project. The County also reserves the ability to participate in the State's nutrient trading program, should it be necessary to meet restoration goals.

Should you require further information, or have any questions or comments, please contact me directly at 240.313.2611 (email jswauger@washco-md.net).

Respectfully,

John W. Swauger, Jr.
Stormwater Management NPDES/MS4 Manager

Attachments: (Link to SharePoint)

MARYLAND DEPARTMENT OF THE ENVIRONMENT
WATER AND SCIENCE ADMINISTRATION

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM GENERAL PERMIT FOR DISCHARGES FROM SMALL MUNICIPAL SEPARATE STORM SEWER SYSTEMS

GENERAL DISCHARGE PERMIT NO. 13-IM-5500
GENERAL NPDES NO. MDR055500

Final Determination:	April 27, 2018
Effective Date:	October 31, 2018
Expiration Date:	October 30, 2023

This National Pollutant Discharge Elimination System (NPDES) general permit covers small municipal separate storm sewer systems (MS4s) in certain portions of the State of Maryland. MS4 owners and operators to be regulated under this general permit must submit a Notice of Intent (NOI) to MDE by October 31, 2018. An NOI serves as notification that the MS4 owner or operator intends to comply with the terms and conditions of this general permit.

APPENDIX D

Municipal Small MS4 Progress Report

Maryland Department of the Environment (MDE)

National Pollutant Discharge Elimination System (NPDES)
Small Municipal Separate Storm Sewer Systems (MS4) General Permit

This Progress Report is required for those jurisdictions covered under General Discharge Permit No. 13-IM-5500. Progress Reports must be submitted to:

Maryland Department of the Environment, Water and Science Administration
Sediment, Stormwater, and Dam Safety Program
1800 Washington Boulevard, Suite 440, Baltimore, MD 21230-1708
Phone: 410-537-3543 FAX: 410-537-3553
Web Site: www.mde.maryland.gov

Contact Information

Permittee Name:	Washington County Maryland
Responsible Personnel:	Mr. John F. Barr - BOCC President
Mailing Address:	100 W. Washington Street
	Hagerstown, MD 21740
Phone Number(s):	240-313-2300
Email address:	jbarr@washco-md.net
Additional Contact(s):	John W. Swauger, Jr. - SWM NPDES/MS4 Manager
Mailing Address:	16232 Elliott Parkway
Phone Number(s):	240-313-2611
Email address:	jswauger@washco-md.net

Signature of Responsible Personnel

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.

John F. Barr	[signature]	10-24-24
Printed Name	Signature	Date

Reporting Period (State Fiscal Year): 2024

Due Date: 10/31/2024 **Date of Submission:** 10/31/2024

Type of Report Submitted:

Impervious Area Restoration Progress Report (Annual): ☑

Six Minimum Control Measures Progress (Years 2 and 4): ☑

Both: ☑

Permittee Information:

Renewal Permittee: ☑

New Permittee: ☐

Compliance with Reporting Requirements

Part VI of the Small MS4 General Discharge Permit (No. 13-IM-5500) specifies the reporting information that must be submitted to MDE to demonstrate compliance with permit conditions. The specific information required in this MS4 Progress Report includes:

1. Annual: Progress toward compliance with impervious area restoration requirements in accordance with Part V of the general permit. All requested information and supporting documentation must be submitted as specified in Section I of the Progress Report.
2. Years 2 and 4: Progress toward compliance with the six minimum control measures in accordance with Part IV of the general permit. All requested information and supporting documentation shall be reported as specified in Section II of the Progress Report. MDE may request more frequent reporting and/or a final report in year 5 if additional information is needed to demonstrate compliance with the permit.

Instructions for Completing Appendix D Reporting Forms

The reporting forms provided in Appendix D allow the user to electronically fill in answers to questions. Users may enter quantifiable information (e.g., number of outfalls inspected) in text boxes. When a more descriptive explanation is requested, the reporting forms will expand as the user types to allow as much information needed to fully answer the question. The permittee must indicate in the forms when attachments are included to provide sufficient information required in the MS4 Progress Report.

Section I: Impervious Area Restoration Reporting Form

Section I: Impervious Area Restoration Reporting

1. a. Was the impervious area baseline assessment submitted in year 1?
☑ Yes ☐ No

   b. If No, describe the status of completing the required information and provide a date at which all information required by MDE will be submitted:

   c. Has the baseline been adjusted since the previous reporting year?
☑ Yes ☐ No

2. Complete the information below based on the most recent data:

   Total impervious acres of jurisdiction covered under this permit: 4348

   Total impervious acres treated by stormwater water quality best management practices (BMPs): 615

   Total impervious acres treated by BMPs providing partial water quality treatment (multiply acres treated by percent of water quality provided): 0

   Total impervious acres treated by nonstructural practices (i.e., rooftop disconnections, non-rooftop disconnections, or vegetated swales): 148

   Total impervious acres untreated in the jurisdiction: 3585

   Twenty percent of this total area (this is the restoration requirement): 717

   Verify that all impervious area draining to BMPs with missing inspection records is not considered treated. Describe how this information was incorporated into the overall analysis:

- **The BMPs included in the calculation of the restoration requirement contain only those BMPs that are considered as being in Normal Operation status. All BMPs with a status of Normal Operation are inspected on a triennial basis as per the MS4 Permit requirements.**

2. Has an Impervious Area Restoration Work Plan been developed and submitted to MDE in accordance with Part V.B, Table 1 of the permit or other format?
☑ Yes ☐ No

Section I: Impervious Area Restoration Reporting

Has MDE approved the work plan?
☑ Yes ☐ No

If the answer to either question is No, describe the status of submitting (or resubmitting) the work plan to MDE and provide a date at which all outstanding information will be available:

Describe progress made toward restoration planning, design, and construction efforts and describe adaptive management strategies necessary to meet restoration requirements by the end of the permit term:

- **County staff (Division of Engineering & Division of Environmental Management,) continue to analyze various means of restoration. A swale study has been completed. A study for retrofitting existing dry ponds is underway. A stream restoration project is awaiting permit approval from MDE. The County is developing a proposal for a Turnkey Program for future projects to meet the proposed 2030 goal.**

3. Has a Restoration Schedule been completed and submitted to MDE in accordance with Part V.B, Table 2 of the permit?
☑ Yes ☐ No

In year 5, has a complete restoration schedule been submitted including a complete list of projects and implementation dates for all BMPs needed to meet the twenty percent restoration requirement?
☑ Yes ☐ No

Are the projected implementation years for completion of all BMPs no later than 2025?
☑ Yes ☐ No

Describe actions planned to provide a complete list of projects in order to achieve compliance by the end of the permit term:

- **Washington County has provided a Restoration Activity Schedule that indicates a successful restoration goal by 2025. All proposed projects are subject to approval by the county administration as well as budgetary limitations. The County will continue to analyze areas for restoration and will update the Restoration Schedule accordingly.**

Describe the progress of restoration efforts (attach examples and photos of proposed or completed projects when available):

Section I: Impervious Area Restoration Reporting

4. Has the BMP database been submitted to MDE in Microsoft Excel format in accordance with Appendix B, Tables B.1.a, b, and c?
☑ Yes ☐ No

   Is the database complete?
☑ Yes ☐ No

   If either answer is No, describe efforts underway to complete all data fields, and a date that MDE will receive the required information:

5. Provide a summary of impervious area restoration activities planned for the next reporting cycle (attach additional information if necessary):

- **A stream restoration project is proposed for the Spring/Summer 2025 at the Smithsburg High School location.**
- **Efforts continue to plant additional trees on publicly owned property.**
- **It is anticipated that a BMP retrofit study will be completed and some restoration will be completed in 2025.**

6. Describe coordination efforts with other agencies regarding the implementation of impervious area restoration activities:

- **Washington County works with MD DNR Forestry Department for implementation of tree plantings in various locations in the county.**

7. List total cost of developing and implementing the impervious area restoration program during the permit term:

- **The estimated cost is approximately 17 million dollars based off previous project costs and proposed estimated amounts. Available monies will ultimately be determined by Washington County's Operating and CIP budgets and are subject to approval by the Washington County Board of County Commissioners. Some efforts and costs are borne by developers and outside agencies and therefore the cost may be estimated. Washington County will revise the cost of developing and implementing the program as necessary as information becomes available.**

Section II: Minimum Control Measures Reporting Forms

MCM #1: Public Education and Outreach

1. Does the permittee maintain a process and phone number for the public to report water quality complaints?
☑ Yes ☐ No

Number of complaints received: 23

Describe the actions taken to address the complaints:

- **Public complaints regarding water quality and/or illicit discharges to stormwater can be made by use of the "Hotline" and web-based complaint forms.**
- **Phone calls are taken via the Division of Environmental Management main phone number during normal working hours. After hour complaints are taken via voicemail which are immediately forwarded to county staff through the email system. An Initial Complaint Form is Initialized by county staff.**
- **A Complaint Form is provided on the Stormwater & Watershed Services webpage. The complaint once submitted is emailed directly to county staff for documentation and investigation.**

Illicit Discharge Complaint Form - Washington County (washco-md.net)

Illegal Dumping Complaint Form - Washington County (washco-md.net)

2. Describe training to employees to reduce pollutants to the MS4:

- **Washington County implements training programs either in person/classroom or online line training modules produced by Excal Visual. All employees can utilize the internal computer network to view the video training and complete an exam. The four training modules are: "Rain Check "which provides a comprehensive overview of Pollution Prevention and Good Housekeeping; "IDDE- A Grate Concern" focuses on Illicit Discharge Detection awareness; "Spill Prevention Containment and Countermeasures (SPCC) focuses on Good Housekeeping Measures for County Public Works facilities; "Storm Watch" provides a general overview of Good Housekeeping methods.**
- **At the conclusion of each training module, a multiple-choice exam must be completed with a passing score to be valid.**

EHS Compliance Training Videos | Excal Visual Inc | United States (excaltraining.com)

3. Describe the target audience(s) within the jurisdiction:

- **The citizens of Washington County are the target audience of the Public Education and Outreach MCM. Through use of the County's social media, we are able to reach those citizens that are interested in Stream Clean Up and Tree Planting events.**

4. Are examples of educational/training materials attached with this report?
☐ Yes ☑ No

Provide the number and type of educational materials distributed: **See Attachment Educational Materials**

Describe how the public outreach program is appropriate for the target audience(s):

- **Washington County provides educational outreach to all ages from Pre-K to senior citizen groups on a variety of topics relating to clean water, TMDL implementation, and NPDES Permit implementation, with a focus on local water quality and local stream TMDLs. County staff have created age-appropriate outreach displays and presentations that are used at schools and for community groups. Displays range in complexity from the basics of the water cycle to deep dives into TMDL and NPDES analysis. Our staff have extensive experience with all age groups and tailor each outreach event to the audience and topics depending on the group's background education and experience.**

5. Describe how stormwater educational materials were distributed to the public (e.g., newsletters, website):

- **County staff plan and attend multiple general public outreach events such as town fairs, the Washington County Home Builders Association Homeshow, and our annual Earth Day community service event. The events allow staff to interact with citizens while distributing pet waste bags, native wildflower seeds, educational handouts, and our children's stormwater book. We are frequently invited into the schools to support teachers and school staff in constructing and implementing their Meaningful Watershed Educational Experience (MWEE), assisting the students and teachers with expert subject matter advice. Each classroom is provided with presentations regarding stormwater and watershed topics as well as the "Marew's Stormwater Adventure", book reading to younger crowds.**
- **Over the last three years, Stormwater and Watershed Services produced videos for the general public that discuss stormwater pollution prevention and highlighting water quality projects completed by local environmental groups. These videos coincide with Earth Day and have become part of our Annual Stormwater Week. Video topics have included residential water quality practices, tree plantings, and other stormwater pollution prevention topics. County residents can also access our stormwater and watershed education information on the Stormwater Watershed Services website.**

6. Describe how educational programs facilitated efforts to reduce pollutants in stormwater runoff:

- **County staff partner with local environmental non-profits throughout the year on creek cleanups and litter cleanups. The education programs further facilitate outreach efforts which in turn lead to County hosted stream and trash clean up events. MWEEs offered presentations on current stormwater and water quality efforts and encouraged students to continue these efforts at home. Our department hosts cleanups with other nonprofit organizations to help reduce pollutants in stormwater runoff. Pet waste bags are distributed throughout the county along with the educational discussion of how managing pet waste helps reduce fecal bacteria and other pollutants in stormwater runoff.**

7. Provide a summary of the activities planned for the next reporting cycle:

- **The Stormwater & Watershed Services Department plans to attend the 2025 Washington County Homebuilders Homeshow and other events that we are invited to, such as the Keedysville Spring Fest. We plan to host the 2025 Earth Day event as well as continuing our efforts to bolster educational programs and the current MWEEs for all Washington County schools. A public facing form is available on the county's website to facilitate educational requests for the department. The department also plans to continue working with nonprofit organizations to host clean-up events, educational events, and any other event that promotes better stormwater and/or water quality.**

8. List the total cost of implementing this MCM over the permit term:

~$308,430

MCM #2: Public Involvement and Participation

1. Describe how the public involvement and participation program is appropriate for the target audience(s):

- **Washington County provides logistic support, public announcements, and staff resources to various stream clean up events and tree planting events. In addition, the County coordinates and provides support for various schools in the county where students complete the tree plantings.**
- **Washington County partnered with NGOs in several events during the last reporting cycle.**
- **Stormwater Awareness Week, which coincides with Earth Day, promoted several videos related to water quality. The week ended with County Employees planting 78 trees at Emma K. Doubs Park.**

(See Attachment Educational Materials and Event Notices*)*

2. Quantify and report public involvement and participation efforts shown below where applicable. **Totals Based on FY 23 & FY 24**

Number of participants at public events:	700
Quantity of trash and debris removed at clean up events:	20 Tons
Number of employee volunteers participating in sponsored events:	125
Number of trees planted:	9669
Length of stream cleaned (feet):	220000
Number of storm drains stenciled:	10
Number of public notices published to facilitate public participation:	10
Number of public meetings organized:	2
Total number of attendees at all public meetings:	3550

Describe the agenda, items discussed, and collaboration efforts with interested parties for public meetings:

MCM #2: Public Involvement and Participation

Describe how public comments have been incorporated into the permittee's MS4 program, including water quality improvement projects to address impervious area restoration requirements:

- **County staff regularly meet with community groups for discussions ranging from outreach planning and grant searches to project development for TMDL and NPDES permit implementation.**

Describe any additional events and activities if applicable:

3. Provide a summary of activities planned for the next reporting cycle:

- **The Stormwater & Watershed Services Department plans to attend the Homeshow and any Earth Day events in the following reporting cycle, as well as continuing our educational program (MWEE) for all Washington County schools. The department also plans to continue working with nonprofit organizations to host clean-up events, educational events, or any of the sort that promotes better stormwater and/or water quality**.

4. List the total cost of implementing this MCM for the permit term:
~$298,000

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

1. Does the permittee maintain a map of the MS4 owned or operated by the permittee, including stormwater conveyances, outfalls, stormwater best management practices (BMPs), and waters of the U.S. receiving stormwater discharges?
   ☑ Yes ☐ No

   If Yes, attach the map to this report and provide a progress update on any features that are still being mapped. If No, detail the current status of map development and provide an estimated date of submission to MDE:

2. Does the permittee have an ordinance, or other regulatory means, that prohibits illicit discharges?
   ☑ Yes ☐ No

   If Yes, describe the means for enforcement utilized by the permittee (alternatively, a link may be provided to the permittee's webpage where this information is available). If No, describe the permittee's plan, including approximate time frame, to establish a regulatory means to prohibit illicit discharges:

   (See attachment.)

3. Describe the process the permittee utilizes for gaining access to private property to investigate and eliminate illicit discharges:

4. Did the permittee submit to MDE standard operating procedures (SOPs) in accordance with Part IV.C of the permit?
   ☑ Yes ☐ No

   If No, provide a proposed date that SOPs will be submitted to MDE. MDE may require more frequent reports for delays in program development:

   Did MDE approve the submitted SOPs?
   ☑ Yes ☐ No

   If No, describe the status of requested SOP revisions and approximate date of resubmission for MDE approval:

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

5. Describe how the permittee prioritized screening locations in areas of high pollutant potential and identify the areas within which screenings were conducted during this reporting period:

- **Visual observations when traveling throughout the county were conducted in search for high pollution potential. Survey123 was utilized for potential hotspot data collection. Identified sites were visited at random to continue monitoring potential pollution.**

6. Answers to the following questions must reflect this two-year reporting period.

How many outfalls are identified on the map? 420

How many outfalls were required to be screened for dry weather flows to meet the minimum numeric requirement (i.e., 20% of total outfalls, up to 100)? 168

How many outfalls were screened for dry weather flows? 216

Per the permittee's SOP, how frequently were outfalls required to be screened?

- **20% per year up to 100**

At what frequency were outfalls screened during the reporting period?

How many dry weather flows were observed? 5

If dry weather flows were observed, how many were determined to be illicit discharges? 0

Describe the investigation process to track and eliminate each suspected illicit discharge and report the status of resolution:

- **A public-facing IDDE complaint form is available on the county's webpage and Survey123 is available for in-house IDDE complaint forms. An analytical test kit is used at the location of the complaint when the illicit discharge is not as obvious as, for example, a bucket of paint. Suspicious flow is tested for pollutants such as detergents, petroleum products, and waste. Once the initial investigation is finished, the IDDE complaint form is either closed or documented for further investigation. A closed investigation is the result of no illicit discharge detection, a resolved complaint, or the complaint located outside of the county's jurisdiction.**

Further investigation includes continued laboratory testing, the clean-up process and if necessary, notification of nearby residential notification.

7. Describe maintenance or corrective actions undertaken during this reporting period to address erosion, debris buildup, sediment accumulation, or blockage problems:
   - **All county-owned outfalls are maintained by the highways department. The Stormwater & Watershed Services department monitors outfalls to ensure no obstruction or overgrowth is present. During the required outfalls inspections, data regarding the stability conditions are included in the records.**

8. Is the permittee maintaining all IDDE inspection records and are they available to MDE during site inspections?
   ☑ Yes ☐ No

9. If spills, illicit discharges, and illegal dumping occurred during this reporting period, describe the corrective actions taken, including enforcement activities, and indicate the status of resolution:
   - **Corrective actions taken include immediate response to IDDE complaints, immediate containment of fuel spills, and continued monitoring at industrial sites and throughout the county through dry weather outfall and hotspot inspections.**
   - **Complaints of Illegal Dumping on county property or within county rights of way are handled by Clean County staff who remove the debris and haul it to the landfill for proper disposal. All complaints regarding dumping on private property are referred to the Department of Planning and Zoning and/or the Health Department for resolution.**

10. Attach to this report specific examples of educational materials distributed to the public related to illicit discharge reporting, illegal dumping, and spill prevention. If these are not available, describe plans to develop public education materials and submit examples with the next Progress Report:
    (See Attachment IDDE)

11. Specify the number of employees trained in illicit discharge detection and spill prevention: 30

12. Provide examples of training materials. If not available, describe plans to develop employee training and submit examples with the next Progress Report:
    - **IDDE A Grate Concern**

    (See Attachment IDDE Training)

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

13. List the cost of implementing this MCM during this permit term:
    $385,000

MCM #4: Construction Site Stormwater Runoff Control

Erosion & Sediment Control Program Procedures, Ordinances, and Legal Authority

1. Does the permittee have an MDE approved ordinance?
   ☑ Yes ☐ No

   Has the permittee submitted modifications to MDE?
   ☑ Yes ☐ No

   Has the adopted ordinance been submitted to MDE?
   ☑ Yes ☐ No

   If No, is the adopted ordinance attached?
   ☐ Yes ☐ No

2. Does the permittee rely on the County, local Soil Conservation District, or MDE to perform any or all requirements for an acceptable erosion and sediment control program? ☑ Yes ☐ No

   If Yes, check all that apply:
   ☑ Plan Review and Approval
   ☑ Construction Inspections
   ☑ Enforcement

3. Does the permittee have a process to ensure that all necessary permits for a proposed development have been obtained prior to issuance of a grading or building permit?
   ☑ Yes ☐ No

   Explain how the permittee ensures all permits are in place:

Erosion & Sediment Control Program Implementation Information

1. Does the permittee have a process for receiving, investigating, and resolving complaints from interested parties related to construction activities and erosion and sediment control?
   ☑ Yes ☐ No

   Describe the process:
   - **The Washington County Division of Permits & Inspections receives complaints via email, office visit or phone call. A service request is produced, noting complainants' concerns. The service request is then forwarded to one of three of our Construction Inspectors. The**

Construction Inspector then investigates the complaint, with a site visit. At that time, it is determined if the property owner is in violation or if the complaint is a civil issue.

(See Attachment Inspections and Permits)
Provide a list of all complaints and summary of actions taken to resolve them:

FY23 & FY24

2. Total number of active construction projects within the reporting period: 159

Provide a list of all construction projects and disturbed areas:
(See Attachment Inspections and Permits)

Does the permittee submit grading reports to MDE (only applies if the permittee has an MDE approved ordinance)?
☐ Yes ☑ No ☐ N/A

3. Total number of violation notices issued related to this MCM within the permit area (report total number whether the permittee or another entity performs inspections):
N/A

Describe the status of enforcement activities:

- **MDE is the enforcement agency for Sediment & Erosion Control violations.**

Describe how the permittee communicates and collaborates with the enforcement authority for violations within the permit area. Include measures taken by the permittee such as suspending or denying a building or grading permit in order to prevent the discharge of pollutants into the MS4:

- **Service Requests are set up for grading over 5000 Sq. Ft., that information is forwarded to MDE for investigation. MDE works with the County to ensure proper permits are applied for when applicable.**

Are erosion and sediment control inspection records retained and available to MDE during field review of local programs?
☐ Yes ☑ No

If No, explain:

- **MDE responsible for ESC. ESC inspection records are completed by the responsible party listed on NOI. They are always available onsite. Construction inspection (Stormwater Management Construction/Roadway Construction) records are available through County software application Accela. Pre-Construction Meeting notes, Interim Water Quality Inspections, and Final Closeout Inspections are available at the Soil Conservation District.**

MCM #4: Construction Site Stormwater Runoff Control

(See Attachment RCP Certificate Holders)

4. Number of staff trained in MDE's Responsible Personnel Certification:
   40

5. Describe the coordination efforts with other entities regarding the implementation of this MCM:
   - **Pre-Construction meetings are held for both Commercial and Residential Properties with disturbance over 15,000 Sq. Ft. During this meeting the plans are discussed in detail to ensure the sequence of construction is understood and followed. During this meeting the Engineer, Contractor, Owner/Developer and County Inspector are involved to ask questions or voice concerns.**
   - **Once construction starts Sediment Erosion Control (SEC) complaints for active construction sites are handled on a case-by-case basis. If Sediment/Dust is leaving the site or proper SEC measures are not installed this is often handled through Soil Conservation District (SCD) or Maryland Department of the Environment (MDE). Some large disturbances are forwarded to MDE for further enforcement. MDE then follows up with a site visit and a report noting the property owner is in violation. Construction Inspectors often notify contractors of complaints of mud on the road or if it's something minor noticed onsite. Construction Inspectors work closely with Contractors/Owners/Engineers, MDE, SCD to ensure compliance. Service Requests are generated for tracking purposes for properties with no active SEC Plan or Grading Permits, phone calls, correspondence, field visits, photos, are documented and attached to the address/parcel.**

6. List the total cost of implementing this MCM over the permit term:
   - **$1,110,000**

MCM #5: Post Construction Stormwater Management

Stormwater Management Program Procedures, Ordinances, and Legal Authority

1. Does the permittee have an MDE approved ordinance? ☑ Yes ☐ No

   Has the permittee submitted modifications to MDE? ☑ Yes ☐ No

   Has the adopted ordinance been submitted to MDE? ☑ Yes ☐ No

   If No, is the adopted ordinance attached? ☐ Yes ☐ No

2. Does the permittee have a memorandum of understanding (MOU) with the County to perform any or all requirements for an acceptable stormwater program?
   ☐ Yes ☐ No

   If Yes, check all that apply:
   - ☐ Plan Review and Approval
   - ☐ First Year Post Construction Inspections
   - ☐ As-Built Plan Approval
   - ☐ Post Construction Triennial Inspections
   - ☐ Enforcement
   - ☐ BMP Tracking and Reporting

Stormwater Management Program Implementation Information

1. Has an Urban BMP database been submitted in accordance with the database structure in Appendix B, Tables B.1.a, b, and c as a Microsoft Excel file?
   ☑ Yes ☐ No

   Describe the status of the database and efforts to complete all data fields:
   - **Data fields are complete with the best data available. Any deficiencies found will be addressed upon notification.**

2. **FY 23 & FY 24**

   Total number of triennial inspections performed: 1656

   Total number of BMPs jurisdiction-wide: 2886

   Are inspections performed at least once every three years for all BMPs?
   ☑ Yes ☐ No

If No, describe how the permittee will catch up on past inspections and remain on track to perform BMP inspections once every three years:

Are BMP inspection records retained and available to MDE during field review of local programs?
☑ Yes ☐ No

- **Total for FY 23 & FY24**

3. Total number of violation notices issued: 251

   Describe efforts to bring BMPs into compliance and the status of enforcement activities within the jurisdiction:
   - **When deficiencies are noted during a routine triennial inspection, property owners are notified of the issues by a corrective action letter sent via certified mail. This letter details the necessary repairs needed to bring the structure back into compliance with the Washington County Stormwater Ordinance. As per the ordinance, owners are given 90 days to submit an approved plan detailing the method of correction and timeframe for repairs. Then, owners are given 150 days to complete the repair work. After 150 days or after receiving notification from the property of the completed repair, the county reinspects the structure to ensure all the cited deficiencies have been addressed.**

4. Describe how the permittee coordinates and cooperates with the County to ensure stormwater BMPs are functioning according to approved standards. (Applicable for municipalities that rely on the County to perform stormwater triennial inspections):

5. Provide a summary of routine maintenance activities for all publicly owned BMPs:

   Number of publicly owned BMPs: 232

   Describe how often BMPs are maintained. Specify whether maintenance activities are more frequent for certain BMP types:
   - **County owned, residential stormwater bmps are mowed once every 3-4 weeks by a private contractor.**
   - **The County Highways Department maintains all stormwater BMPs within rights-of-way and at Highway facilities, every 2 weeks.**
   - **Brush removal, fence repair, and stabilization, is performed as needed.**

MCM #5: Post Construction Stormwater Management

Are BMP maintenance checklists and procedures for publicly owned BMPs available to MDE during field review of local programs?
☑ Yes ☐ No

Are BMP maintenance records retained and available to MDE during field review of local programs?
☑ Yes ☐ No

If either answer is No, describe planned actions to implement maintenance checklists and procedures and provide formal documentation of these activities:

6. Number of staff trained in proper BMP design, performance, inspection, and routine maintenance: 10

7. Provide a summary of activities planned for the next reporting cycle:
   - **The Department of Stormwater Watershed Services plans to assume responsibility for maintenance of county owned stormwater BMPs within county subdivisions. Thus, insuring those BMPs remain in compliance.**

8. List the total cost of implementing this MCM over the permit term:
   ~$550,000

MCM #6: Pollution Prevention and Good Housekeeping

1. Provide a list of topics covered during the last training session related to pollution prevention and good housekeeping, and attach to this report specific examples of training materials:

   (See Attachment Pollution Prevention Training)

   List all training dates within this two-year reporting period:

   (See Attachment Pollution Prevention Training)

   Number of staff attended: 134

2. Are the good housekeeping plan and inspection records at each property retained and available to MDE during field review of the local program? ☑ Yes ☐ No

   If No, explain:

   Provide details of all discharges, releases, leaks, or spills that occurred in the past reporting period using the following format (attach additional sheets if necessary).

   (See Attachment Spill Response)

   Property Name: Date:

   Describe observations:

   Describe permittee's response:

3. Quantify and report property management efforts as shown below, where applicable (attach additional sheets if necessary).
   - **FY 23 & FY24**

   Number of miles swept: Total 1589

   Amount of debris collected from sweeping (indicate units): 723 Tons

   If roads and streets are swept, describe the strategy the permittee has implemented to maximize efficiency and target high priority areas:

   Number of inlets cleaned: 57

   Amount of debris collected from inlet cleaning (indicate units): 31.560 lbs

MCM #6: Pollution Prevention and Good Housekeeping

Describe how trash and hazardous waste materials are disposed of at permittee owned and operated property(ies), including debris collected from street sweeping and inlet cleaning:

- **Sweeper and inlet debris is collected in a dump truck that works with our sweeper. The debris is taken to 40 West Landfill where it is weighed and properly disposed. Roadside trash and debris are collected and disposed of in our dumpster and then hauled to the landfill where it is disposed of properly. All hazardous waste is handled by our solid waste dept in accordance with state and federal laws.**

Does the permittee have a current State of Maryland public agency permit to apply pesticides?

☑ Yes ☐ No

If No, explain (e.g., contractor applies pesticides):

Does the permittee employ at least one individual certified in pesticide application?

☑ Yes ☐ No

If Yes, list name(s):

(See Attachment Fertilizer and Pesticide)

If the permittee applied pesticides during the reporting year, describe good housekeeping methods (e.g., integrated pest management, alternative materials/techniques):

(See Attachment Fertilizer and Pesticide)

If the permittee applied fertilizer during the reporting year, describe good housekeeping methods (e.g., application methods, chemical storage, native or low maintenance species, training):

(See Attachment Fertilizer and Pesticide)

If the permittee applied materials for snow and ice control during the reporting year, describe good housekeeping methods (e.g., pre-treatment, truck calibration and storage, salt domes):

- **Washington County Highways utilizes a spray truck to apply a mixture of sodium-based salt and water for pretreatment of county roads to reduce salt applications. All salt used for roadway treatment is contained within salt domes at each of the county's highway facilities.**

Describe good housekeeping BMP alternatives not listed above:

MCM #6: Pollution Prevention and Good Housekeeping

4. If applicable, provide a status update for permittee owned or operated properties regarding coverage under the Maryland General Permit for Stormwater Discharges Associated with Industrial Activity or an individual industrial surface water discharge permit:
   (See Attachment NPDES Industrial General Permit)
5. List the total cost of implementing this MCM over the permit term:

~$550,000