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

ST. MARY'S COUNTY
YEAR 6 - 2024 MS4 PROGRESS REPORT

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

OCTOBER 31, 2024

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:	St. Mary's County
Responsible Personnel:	James M. Gotsch, P.E., Director
Mailing Address:	Department of Public Works & Transportation
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Phone Number(s):	(301) 475-4200 Ext. 3510
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Additional Contact(s):	Dylan Payne, Program Manager
Mailing Address:	Department of Public Works & Transportation
Phone Number(s):	(301) 475-4200 Ext. 3514
Email address:	Dylan.Payne@stmaryscountymd.gov

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.

James M. Gotsch		10-31-24
Printed Name	Signature	Date

Reporting Period (State Fiscal Year): 2024

Due Date: 10-31-24 **Date of Submission:** 10-31-24

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: 2548.50

   Total impervious acres treated by stormwater water quality best management practices (BMPs): 330.79

   Total impervious acres treated by BMPs providing partial water quality treatment (multiply acres treated by percent of water quality provided): 67.55

   Total impervious acres treated by nonstructural practices (i.e., rooftop disconnections, non-rooftop disconnections, or vegetated swales): 2.55 (RAS)

   Total impervious acres untreated in the jurisdiction: 2217.71

   Twenty percent of this total area (this is the restoration requirement): 443.54

   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:
   Only impervious areas draining to functioning water quality BMPs with as-built plans or proper verification documentation were counted as treated. Impervious areas draining to BMPs with missing documentation or facilities not currently being tracked, were included in the total untreated impervious acres in the jurisdiction.

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

   Has MDE approved the work plan?
☑ Yes ☐ No
   MDE has approved the previous versions of the Work Plan. A revised version of the Work Plan including Year 6 information has been included with this submittal as ***Attachment "B"*** - Y6 2024 SMC Work Plan.

Section I: Impervious Area Restoration Reporting

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:
N/A

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:
Documented restoration projects in the amount of 599.78 acres completed between January 2006 and October 2024 is calculated to provide enough treatment to meet St. Mary's County's current 20% restoration goal. The County has an additional 53.7 acres of restoration credit from future shoreline management projects and 11.47 acres from redevelopment projects that are currently in the planning phase. Once completed, these projects will bring the St. Mary's County's restoration credit to an estimated 664.95 acres.

The St. Mary's County DPW&T- MS4 Program has planned for and is currently working towards an additional 10% restoration goal, through 2030 per MDE guidance. St. Mary's County MS4 has established a path toward the target goal of 221.77 acres by planning 221.41 acres of restoration activities including the completion of currently under construction and planned restoration projects. The remaining 0.36 acre goal will be met by way of continued efforts to document completed restoration projects, tracking BAT conversions, prioritizing BMP maintenance, restoring failing BMP's while working closely with the responsible parties and their contractors to ensure the facilities are in compliance, and collection of missing as-built plans to make them creditable. Proposals have been acquired for the creation of as-built plans for County owned facilities that were missing as-built data.

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:
A complete list of projects is provided with this submittal that illustrates that the County exceeds the 20% restoration goal and meets all but 0.36 acres of the additional 10% goal through 2030. St. Mary's County will continue to document and update the Restoration Activity Schedule (RAS) as projects are proposed and/or completed.

Section I: Impervious Area Restoration Reporting

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

Restoration projects completed from January 2006 to October 2024 have surpassed the St. Mary's County 20% restoration goal. See attached report for project descriptions and treatment. Furthermore, St. Mary's County will have completed over 90% of the proposed 10% restoration goal by 2025 and will meet the remaining goal by 2030 through continued efforts. Many of the previously planned projects are now under construction or have been granted permits.

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:

N/A

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

The County will continue documenting additional restoration projects from inception to completion according to State requirements. These types of restorations would comprise of funded County capital improvement program (CIP) projects, County facility maintenance projects, and private development projects. The County has been working with and supporting outside environmental contractors to set up supplementary living shoreline and stream restoration projects. These kinds of nutrient removal and water quality credits align shared goals that support the local watersheds and the MS4 permit objectives. The County will also continue maintenance efforts to restore failing or non-compliant BMPs to a functioning condition.

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

St. Mary's County works with a multitude of internal divisions within our Department of Public Works and Transportation for example, MS4 division tracking of the RAS, Construction and Inspection division for implementation of new treatment devices, Highways Maintenance division for upkeep of existing stormwater infrastructure and debris removal/regenerative street sweeping and Engineering division for the rehabilitation within subdivision related to roads and stormwater management. We also work with other County departments such as Land Use and Growth Management (LUGM) with the Watershed Implementation Plan (WIP) and tracking of residential stormwater efforts. Furthermore, the County works with State agencies such as the Department of Natural Resources along shorelines, the Maryland Department of the Environment where opportunities become available, Soil Conservation District with ag related restoration activities and the Health Department on IDDE concerns and newly installed BAT systems. We continue to coordinate with multiple organizations outside the federal, state, and local governments, for example University of Maryland Extension on implementing/documenting homeowner BMPs.

Section I: Impervious Area Restoration Reporting

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

Based on the costs on the restoration activity schedule the estimated implementation totals during this permit term thus far is $27.7 million with an additional 2+ million dollars for the currently proposed projects.

The County has spent approximately $2.98 M of approved funding dedicated solely to water quality and nutrient removal Capital Improvement Programs (CIP) related to the implementation of restoration type activities. These CIP projects are focused on impending efforts that include stormwater management retrofits, potential MS4, National Pollutant Discharge Elimination System (NPDES) creditable practices, and support for creditable shoreline, stream/wetland restoration type projects. These efforts all provide County watershed benefits as well as to ensure MS4 Permit compliance.

Through grant funding of CIPs, the County has used $4.78 M for a multitude of water quality retrofit projects.

The budget authority totals for Operating costs since the inception of the permit cycle are as follows: contracted SWM support services and mapping $671,000, contracted SWM inspections $643,000, contracted IDDE inspections $327,090.

The County has also spent approximately $1,760,000 on employees' annual salaries and associated employment costs. Salary and CIP costs are not included in Section II, MCM implementation costs.

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: 40

   Describe the actions taken to address the complaints:
   The County has in place a website and our 311 System for reporting water quality and suspected stormwater pollution complaints as well as the phone number for intake of concerns. Included with this submittal is a spread sheet that lists the complaints from the 311 System entitled ***Attachment "C"*** – Y6 2024 SMC MCM 1 311 Reports - Suspected Stormwater Pollution. Of the complaints received via the 311 System or other means, it was determined after research, investigation, inspection, and a validation process that some fell under the IDDE category, others were forwarded to the appropriate local or state agencies for further review and enforcement and some were not confirmed.

2. Describe training to employees to reduce pollutants to the MS4:
   MS4 pollutant training overlaps with the good housekeeping training as well as the County's Stormwater Pollution Prevention Plans (SWPPP). These trainings include sediment discharge, waste management, hazardous & yard waste, chemicals, washing activities, material storage, disposal options, roadway maintenance, recycling & trash pickup, illicit discharges, spill prevention and best management practices for associated items. The best management practices (BMP) cover multiple targeted activities and pollutants, along with key approaches for prevention, containment, maintenance, and standard practices. Educational classes are offered, and professional environmental publications are routinely distributed to bring awareness to current events and topics regarding stormwater pollution and mitigation techniques. The County has also provided classroom opportunities with on-demand classes and webinars by Halfmoon Education and CED Engineering on topics that address sources of stormwater pollutants.

3. Describe the target audience(s) within the jurisdiction:
   The County's main target audience is all residents of St. Mary's County and some in Calvert County. Focusing on urbanized areas with underserved communities, local businesses and student education. The County receives help from educators with the University of Maryland Extension and local non-profits to bring awareness to stormwater pollution and mitigation, and maintenance. Our stormwater inspectors are on the front lines of this effort. Every inspection at a residence or business brings the opportunity to educate the public on stormwater BMP's, their purpose and importance related to water quality. The County will continue to engage the community on the important role they play. We are expanding our educational outreach program to influence more commercial establishments on best management practices.

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

   Provide the number and type of educational materials distributed:
   Describe how the public outreach program is appropriate for the target audience(s):
   97,250 pieces of educational material have been distributed to the public. Materials targeted various age ranges and stormwater related topics. Publications included an MS4 Fact Sheet, stormwater coloring books, rain garden installation guide, ground and stormwater tip book and a stormwater bookmark. ***Attachment "D" -*** Y6 2024 SMC MCM 1 Educational Material.

5. Describe how stormwater educational materials were distributed to the public (e.g., newsletters, website):
   The County distributed 1,250 publications at various special events last year which included the County Fair, Earth Day, Environmental Stewardship Event and the Backyard Buffer Program. MS4 also distributed a total of 96,000 MS4 Fact Sheets, ***Attachment "E" -*** Y6 2024 SMC MCM 1 MS4 Flyer, mailing one to each tax paying residence over the past two years.
   The County also provided educational materials via a flyer box at each of the convenience centers and the landfill. In addition, reference materials on environmental stewardship were provided by the local University of Maryland Extension during two events, the Environmental Stewardship Event and the Backyard Buffers Program ***Attachment "F" -*** Y6 2024 SMC MCM 1-2 UME Annual Report.

6. Describe how educational programs facilitated efforts to reduce pollutants in stormwater runoff:
   The Bioretention Interpretive Board installed at Lexington Park Public Library, ***Attachment "G" -*** Y6 2024 SMC MCM 1 Interpretive Board-Bioretention, illustrates the flow of water from a parking lot into the stormwater BMP where it is treated, removing pollutants. Coloring books for children teach stormwater pollutants and good housekeeping practices. Rain barrel workshops are educational for adults and children, in addition to materials distributed, 38 rain barrels to the community to reduce stormwater pollutants. Neighborhood clean-up programs removed debris and litter from entering waterways. Composting reduced yard waste, 18 composting bins were distributed during educational events. Environmental related presentations to high school students create future stewards.

7. Provide a summary of the activities planned for the next reporting cycle:
   - Report on progress made with re-establishing the local Watershed Stewards Academy. This activity will be a joint effort with the University of Maryland Extension and is actively being discussed.
   - Create door tags for pollution prevention education
   - Updates to the County website for public information related to stormwater
   - Outreach activity with the local 4-H youth development organization and/or Boy Scouts of America to schedule a storm drain inlet tagging and cleaning event focused on education

8. List the total cost of implementing this MCM over the permit term:
   The total cost of implementing this MCM has been approximately $9,200+ for the overall permit term thus far.

MCM #2: Public Involvement and Participation

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

The public participation events conducted educate children and adults within the urbanized areas and throughout the County. We conduct rain barrel workshops with a presentation prior distributing rain barrels to discuss pollutants and conservation. The Stormwater Inlet Painting event, ***Attachment "H" -*** Y6 2024 SMC MCM 2 Stormwater Inlet Painting, held at a local public library within an underserved community allowed participation of both children and parents to learn about the importance of keeping pollutants from entering our waterways and reduce impacts to the local watershed. The County government sponsors a Citizens Academy for citizens to participate over the course of 10 weeks. It includes 8 weeks of classes (dinner provided), optional public forum participation, and a recognition ceremony. DPW&T hosted 30 participants and presented the MS4 Program goals and public education and participation opportunities currently available. ***Attachment "I" -*** Y6 2024 SMC MCM 2 Citizens Academy

2. Quantify and report public involvement and participation efforts shown below where applicable.

Number of participants at public events:	3122
Quantity of trash and debris removed at clean up events:	250lbs+
Number of employee volunteers participating in sponsored events:	86
Number of trees planted:	4036
Length of stream cleaned (feet):	300
Number of storm drains stenciled:	168
Number of public notices published to facilitate public participation:	96,000
Number of public meetings organized:	18
Total number of attendees at all public meetings:	400

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

Posting public notices for public meetings and MS4 workshops on the County's website or though social media outlets and/or University of Maryland Extension's webpage is the most effective way to do promote collaborations with interested parties to reach our common goals.

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:

MS4 has initiated unscheduled projects after receiving comments from citizens regarding erosion, sediment, localized flooding or damage to existing BMP's. The program continues to establish partnerships with non-profit agencies specializing in restoration and mitigation. Working in partnership with these agencies often leads to additional water quality improvements and restoration involving stream restoration and living shoreline projects.

Describe any additional events and activities if applicable:

County's MS4 Staff attended clean-up events where the residents collected 250+ pounds of trash and debris from drainage ditches and tree planting took place. The County plans to continue to utilize its partnership with the University of Maryland Extension under their Sea Grant Extension Program and other organizations to find additional ways to promote public involvement.

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

Yearly re-occurring events are scheduled to promote public involvement and participation, some of these include but are not limited to.

1.) Community tabling events/educational booth
- River Festival (Historic St. Mary's City) – late September
- St. Mary's County Fair (St. Mary's Fairgrounds) – multiple days in September
- Oyster Festival (St. Mary's Fairgrounds) – mid-October
- Envirothon through our local SCD Office – mid-November

2.) Workshops
- Environmental Stewardship Event – Summer
- Workshops: Backyard Composting, Rain Barrels, Septic Solutions 101
- Watershed Stewards Academy – Joint – Open for Calvert and St. Mary's Counties' residents

3.) Current St. Mary's County programs and partner programs to encourage participation in,
- Hazardous Waste Collection Days – 2 times a year
- Recycling – general practice, paper shredding events, free mulch days
- Backyard Buffers Program – St. Mary's WSA and Department of Natural Resources
- Prescription Drop-Off Program – Ongoing. In 2021 there were 1366 pounds collected, in 2022 1053 pounds, in 2023 1444 pounds of prescription medications were collected by the Sheriff's Office. Proper disposal of prescription and over-the-counter medications protects our community and environment especially water quality by keeping drugs from entering our water system when flushed or poured down the drain.

Other planned efforts include trying to establish an adopt a stream/river/stormwater facility for litter removal and clean-ups (like the current Adopt-A-Road program), distributing public surveys related to stormwater and stormwater events/workshops to get the public's opinion, and creating additional partnerships within the community to increase our participation in related outreach events and education.

4. List the total cost of implementing this MCM for the permit term:

The total cost of implementing this MCM has been approximately $6,600+ for the overall permit term thus far.

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:
   Many of the outfalls in the current MS4 map were identified through a desktop evaluation and are not true stormwater outfalls, as determined upon inspection. For example, many of the current outfalls are drainage ditches, ditch intersections, or driveway culverts. Therefore, we will work to improve the accuracy of the existing outfall inventory and allow resources to be focused on screening true stormwater outfalls with higher pollutant potential. Coordination efforts have begun between the County's GIS Department, MS4 Staff and contractor to create an IDDE outfall screening/inspection feature class within the current geodatabase. An updated map will be submitted to MDE in a future progress report. It is anticipated that this effort will result in a reduction in the number of outfalls mapped as part of the MS4.

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:
   The signed and approved IDDE Ordinance No. 2020-45 entitled St. Mary's County Storm Water and Illicit Discharge Detection and Elimination Ordinance took effect as of January 4, 2021, and was included with a previous annual report submission. The document is also recorded in the courthouse land records of St. Mary's County at Liber 28 Folio 392. In the recorded ordinance under Article IV, it defines violations, enforcement measures and associated penalties.

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

   1. First Effort – Request permission to enter property from resident/owner/property manager. The County has created an IDDE inspection letter for contactors to give to the community when attempting to inspect or test outfall locations on private property that helps to explain IDDE and serves as notice to the citizens. See ***Attachment "J" -*** Y6 2024 SMC MCM 3 IDDE Inspection Letter
   2. A right of entry form can also be used if additional investigation, testing, or onsite labor is required.
   3. Ordinance No. 2020-45, Section 265-12 - If the violation constitutes an imminent or substantial endangerment to public health or public safety, DPW&T is authorized to enter upon the subject private property, without giving prior notice, to take any and all measures necessary to abate the violation and/or restore the property.

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

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:
   Previously a standard operating procedure (SOP) entitled Illicit Discharge Detection and Elimination (IDDE) Inspection & Investigations Program Standard Operating Procedures dated July 17, 2020, was submitted. Then a revised version dated 9/28/21 was also submitted which added the requested language about the 100 outfalls related to the permit requirements to be inspected each year.

   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:
   N/A

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:
   Screening locations were identified through prioritizing those within and adjacent to the County high level urban land use area and along the MD 235 corridor where illicit discharges are most likely to occur. These locations included commercial, industrial, and residential land uses. IDDE inspections were performed at outfalls that were determined to be true stormwater outfalls, and therefore have higher pollutant potential. Efforts are underway to further refine the outfall inventory to allow for more focused screening in future years. For example, this could include focusing on major outfalls.

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

   How many outfalls are identified on the map? 2159

   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)? 100

   How many outfalls were screened for dry weather flows? 213

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

   At what frequency were outfalls screened during the reporting period?
   Once per year

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

How many dry weather flows were observed? 21

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:

See ***Attachment "K"*** - Y6 2024 SMC MCM 3 IDDE Field Investigations. That project memorandum helps to explain and illustrate some of the County's investigation processes. Specifically, the workflow for identifying and tracking down suspect, potential, or obvious illicit discharges. Along with the coordination efforts that take place between the County's MS4 Program and hired contractor. These collaborative efforts to complete additional investigations and reinspection if warranted are unified. Included in the project memorandum is one example of those efforts, see Attachment 1, Email Notification Regarding Possible Illicit Discharge. That incident was followed up by an internal MS4 inspector's examination. See the first investigation summary form of ***Attachment "L"*** - Y6 2024 SMC MCM 3 IDDE Summary Forms as an example, as well as a few others.
The County has also contracted services to inspect existing infrastructure at outfall locations throughout the County to assist in identifying maintenance concerns that need rehabilitation and visual inspections for possible discharges while onsite.

Please also reference the Field Investigation and Enforcement Actions section of the Standard Operating Procedure (SOP): Paraphrased - Investigate promptly, once detected, follow to source, contact the property owner to address resolution. For identified hazardous conditions/concerns monitor and activate additional County resources as required.

7. Describe maintenance or corrective actions undertaken during this reporting period to address erosion, debris buildup, sediment accumulation, or blockage problems:
   Any issues identified during routine IDDE inspections, items included in the said project memorandum under Table 3, or citizens' concerns brought to our attention, are forwarded for a follow up inspection. As necessary notifications are sent to the associated property owners or in the case of the publicly owned site to the MS4 Senior Program Manager for corrective action. Some of the required maintenance activities are handled with resources within the Department and some are contracted out. In most cases the County Highways Division mitigates erosion issues, sediment accretion concerns and blockages in compromised outfall locations.

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

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

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:
   IDDE investigations take place upon intake of complaints. Our inspectors visit the site and fill out a field report and document the issue with notes and pictures of each event. Once the initial field investigation is performed and IDDE concerns are validated. The next step would be to forward the occurrence to any of the County's other departments if required. Any corrective actions that are needed will be completed and if the illicit discharge requires additional steps to comply, then some means of enforcement will be taken per the approved IDDE ordinance.

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:
    The County website has information available about IDDE related topics that the public can access. Flyers have been made and continue to be distributed. Additional Program materials have also been developed as part of the Public Education development activities.

11. Specify the number of employees trained in illicit discharge detection and spill prevention: 7

12. Provide examples of training materials. If not available, describe plans to develop employee training and submit examples with the next Progress Report:
    The complete Illicit Discharge Detection & Elimination (IDDE) Program, County Training Session power point presentation and example Certificate of Completion were submitted with a previous annual report as supplemental information. Also note that this MCM overlaps some topics that are covered under MCM 6 and with our annual SWPPP Training.

13. List the cost of implementing this MCM during this permit term:
    The total cost of implementing this MCM has been $327,090 for the overall permit term thus far.

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:

   The County's DPWT will not issue Grading Permits until all items on the DPWT grading permit requirement letter have been completed. This process includes an application, inspection and applications fees, a performance bond or letter of credit guaranteeing the restoration and stabilization of the site and construction of the stormwater management structures, the recording of an Inspection and Maintenance Agreement for private stormwater management facilities, NOCC forms, site plan approval from Land Use and Growth Management (LUGM), three sets of final plans with St. Mary's County Soil Conservation District (SCD) signature approval, and a copy of the NPDES Notice of Intent (NOI) must be filed by the Applicant with the Maryland Department of the Environment, Water Management Administration regarding construction activities if applicable.

MCM #4: Construction Site Stormwater Runoff Control

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:
   St. Mary's County Soil Conservation District (SCD) is the designated authority regarding erosion and sediment control.

   Provide a list of all complaints and summary of actions taken to resolve them:
   If the Department of Public Works and Transportation (DPWT) receives an erosion and sediment control call, we will research, investigate, and validate the complaint and then it is sent to the local SCD to investigate and/or forward to the local MDE assigned inspector for enforcement.

2. Total number of active construction projects within the reporting period: 110

   Provide a list of all construction projects and disturbed areas:
   A list of active construction projects including the associated disturbed areas are contained in ***Attachment "M"*** – Y6 2024 SMC MCM 4 Active Grading Permits with LOD Table.

   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):
   0

   Describe the status of enforcement activities:
   The County is not the Designated Authority for enforcement of this MCM. However, the County works closely with our local SCD and MDE to report any potential violations made during our inspections.

   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:
   County inspectors from LUGM and DPW&T routinely identify such sites and advise both those responsible for the construction project and the MDE assigned Inspector of the perceived failures. Actions from County staff will occur in coordination with the MDE inspectors on how violations affect the existing permits. This may include the County creating a code violation case and the posting of stop work orders. At times when the Sediment and Erosion Control (SEC) plan approval is revoked by SCD, the County requires that a revised SEC plan is received prior to resumption of work.

MCM #4: Construction Site Stormwater Runoff Control

Are erosion and sediment control inspection records retained and available to MDE during field review of local programs?

☐ Yes ☑ No

If No, explain:

The County is not the Designated Authority for related to inspection records or this MCM.

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

   64+

5. Describe the coordination efforts with other entities regarding the implementation of this MCM:

   The County works with the local SCD and MDE inspectors to ensure the full implementation and enforcement of this MCM.

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

   The total cost of implementing this MCM has been $829,107 for the overall permit term thus far. This information was provided by the local SCD office as they are the Designated Authority for the implementation of this MCM.

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:
   The database for BMP's is a live document with new and/or revised dates regarding inspections etc. being updated recurrently. The County implemented Cityworks Respond software for the purpose of better managing and tracking BMP inspections, and maintenance activities.
   Cityworks Respond is a GIS-centric Asset Management System (AMS) that ties into the existing County Geodatabase. It provides detailed tracking of site visits, follow up inspections, completed work, future work required and cost tracking. In the future, data generated from its implementation will provide the County with valuable information that can be used to determine programmatic funding needs related to operating costs and staffing.
   The MS4 Program uses Cityworks to see the real-time status of all inspections from customized dashboards. Users can easily check on the status of BMP's through queries and generate reporting on any aspect of the inspection report or BMP.

2. Total number of triennial inspections performed: 874

MCM #5: Post Construction Stormwater Management

Total number of BMPs jurisdiction-wide: 1309

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

3. Total number of violation notices issued: 16

Describe efforts to bring BMPs into compliance and the status of enforcement activities within the jurisdiction:
In general, the County uses energy to bring existing facilities into compliance. The SWM Ordinances outlines the review and enforcement process. See ***Attachment "N"*** - Y6 2024 SMC MCM 5 Stormwater Inspection Compliance Workflow Chart, for the timeline of events for each circumstance within the process. It should be noted that the majority of non-compliant BMPs are brought back into compliance before issuance of violations, citation or legal action through working with the responsible parties.

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):
N/A

5. Provide a summary of routine maintenance activities for all publicly owned BMPs:
Of the 194 publicly owned/operated sites, St. Mary's County Government is the responsible party for 142 facilities. See breakdown of County tracked Public or Quasi-Public BMPs:
Recreation & Parks - 51
Department of Public Works & Transportation - 91
St. Mary's County Public School System - 41
St. Mary's Housing Authority - 3
Metropolitan Commission - 4
United States Postal Service - 2
Volunteer Rescue Squads - 2

Constant stormwater management maintenance activities relating to the published maintenance schedule for BMP facilities are employed for publicly owned sites. These types of efforts include landscaping features (plantings, biomaterials, mulch, and Filterra units) that are addressed using the County's landscaping contract. Other corrective actions that fall outside of the mowing or landscaping contracts are addressed by specialized contractors based on seasonal inspections.

Number of publicly owned BMPs: 194

MCM #5: Post Construction Stormwater Management

Describe how often BMPs are maintained. Specify whether maintenance activities are more frequent for certain BMP types:

Regular maintenance of the BMPs and their schedules for each type have been established and posted on the County's website. This maintenance schedule was established to keep BMPs in good condition and function as designed. It also explains the remedial actions that need to be taken to ensure that proper repairs or restoration are completed in accordance with the general guidelines established by MDE. These minimum requirements for standard best management practices (BMP's) are being implemented.

BMP landscaping needs are addressed in house or by a contractor, this maintenance is performed at least two times a year. Maintenance needs are achieved based on current inspections. These systematic maintenance efforts help to keep larger corrective actions costs down.

The County has noticed that particular micro-practices need more attention to maintain in working order. This starts in the design phase with additional efforts to wane compaction around the proposed devices, protective sediment control measures to alleviate unwanted sediment during the construction and continued actions throughout the lifecycle of the device. Other work once constructed includes attention to undesirable non-native vegetation and the remediation thereof and replacement of dead installed plants. These smaller facilities seem to require more maintenance and up-keep for functionality and aesthetics.

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:

Through the implementation of the software "Cityworks" the County is recording maintenance records with a newly improved process. This software initiates inspections based on dates, so our inspectors will get work orders beforehand detailing the upcoming BMP inspections that are due. The inspection reports have also been revamped to be mobile & digital so the inspectors will be able to fill them out in the field which improves efficiency. See ***Attachment "O" -*** Y6 2024 SMC MCM 5 Cityworks.

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 County has plans to implement additional activities for the next reporting cycle, they include but are not limited to;

- Continue the use of the new software to keep track of maintenance and inspection items
- Continue to use digital forms/checklists to expedite the inspection process
- Continue to enhance and support ongoing maintenance solutions toward compliance
- Key on facilities that need corrective action by increasing enforcement efforts for violations

MCM #5: Post Construction Stormwater Management

8. List the total cost of implementing this MCM over the permit term:
   Contracted SWM Inspections = $643,000
   MS4 Staff Development Training related to SWM = $9,900
   County Owned SWM Maintenance Activities = $195,500 + (p/o $2.98 M CIP funds)
   Equipment & Maintenance of Equipment = $141,065
   The total cost of implementing this MCM has been $989,465 for the overall permit term thus far.

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:
   The topics included sources of pollution, County procedures related to prevention, reporting and action procedures, how to prevent/reduce pollutant runoff, application of pesticides, fertilizer & ice control measures, sediment discharge, waste management, yard waste, chemicals, washing activities, material storage, roadway maintenance, septic system discharge, swimming pool discharge, landscaping irrigation, accidental spills, Biochemical Oxygen Demand (BOD), micro-plastics, spill prevention, proper labeling of materials/chemicals, Reduce-Reuse-Recycle, and discussed individual checklist for maintenance and management criteria. This list of topics was covered in a Power Point Presentation entitled "Good Housekeeping Program Procedures, County Training Session" that was previously submitted in year 3. See ***Attachment "P" -*** Y6 2024 SMC MCM 6 Training Sign-in Sheet Example.

   List all training dates within this two-year reporting period:
   February 22, 2023, June 6, 2024, & June 7, 2024

   Number of staff attended: 53

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:

   The Good Housekeeping Program Procedures are kept at a single location at the main office of the DPW&T along with the inspection reports for the individual sites. This information is also available to County staff via our local network.

   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).

   Property Name: Date:

   Valley Lee Convenience Center 4/22/2024

   Describe observations:

   Bio-Degradable Oil spill caused by hydraulic fitting failure on a trash trailer.

Describe permittee's response:

County staff quickly shut off the unit, minimal oil loss occurred. The County employee was able to contain the spill on the pavement and clean the spill up with absorbent pads and stay dry.

3. Quantify and report property management efforts as shown below, where applicable (attach additional sheets if necessary).

Number of miles swept: 469

Amount of debris collected from sweeping (indicate units): 92.74t

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

The County has procured a new regenerative street sweeper/vacuum truck. The County has developed a system for tracking and logging the cleaning of the roadways and inlets in the priority urbanized areas. This strategy will in turn help to reduce nitrogen, phosphorus and sediment loads at the upland point sources before making its way to the local watersheds and Chesapeake Bay. With the implementation of this plan an equivalent credit for impervious acres being treated will be reported. Note: The amount of debris collected is 92.74 "Dry" Tons (i.e. has accounted for the 70% factor).

Number of inlets cleaned: 2

With the implementation of the sweeper truck the County started to clean inlets but found this to be difficult with the existing short hose attachment. Therefore, the County is in the process of procuring new street sweeper/vacuum truck accessories to be able to clean out more catch basins. We have established a process to safely clean streets by completing the sweeper portion and then following up with the inlet cleaning with appropriate traffic controls and additional equipment.

Amount of debris collected from inlet cleaning (indicate units): N/A

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:

The County currently has hazardous waste days a couple times a year for the collection of hazardous waste, where a contractor collects and disposes of such waste. The collection occurs at a licensed County site currently covered under permit 20SW0656. Debris from street sweeping and inlet cleaning is stored at a SCD approved E&S site that is also under the same 20SW0656 permit and reusing acceptable materials.

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):
Richard Tarr, Pesticides
Francis Bowles. Pesticides
James C. Farren, Professional Fertilizer Business License
James C. Farren, Professional Fertilizer Applicator
David M. Oliver, Professional Fertilizer Applicator
Bernard L. Copsey Sr., Professional Fertilizer Applicator
Robert A. Bailey, Professional Fertilizer Applicator

See ***Attachment "Q"*** – Y6 2024 SMC MCM 6 Licenses

If the permittee applied pesticides during the reporting year, describe good housekeeping methods (e.g., integrated pest management, alternative materials/techniques):
Pesticides are applied per the standard set forth by Maryland Department of Agriculture and are stored in an enclosed building with appropriate labeling/warnings.

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):
Fertilizer is stored in a shed with appropriate labels on the doors and is the only contents of the shed. Fertilizer is applied using a tractor or walk-behind applicator attachment by a Licensed Professional.

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):
The County created a capital facility project that replaced an existing salt dome with a new modern barn structure implementing improved design to minimize unwanted runoff. Other existing salt domes and barns utilized straw bales/foam rubber berms to prevent ingress/egress of runoff. Currently the County applies salt at a rate of 400-600 pounds per mile depending on the type of storm event, the County stives to minimize salt usage when applicable. The County applied 1,300 tons of road salt during the 2023 & 2024 snow seasons.

Describe good housekeeping BMP alternatives not listed above:
See previously submitted material about other additional Good Housekeeping alternatives in the Power Point Presentation used for the County Training Sessions.

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:
The properties operating under Industrial Stormwater Discharge Permits have increased to the following: 20SW0656, 20SW3778, 20SW3779, 20SW3780, 20SW3781, 20SW3782.

MCM #6: Pollution Prevention and Good Housekeeping

5. List the total cost of implementing this MCM over the permit term:
   The associated costs for this MCM overlap with MCM3, as the set-up of these two MCMs were supported by the same contractor in the beginning of the permit cycle. Other additional costs since that time were generally in-house overhead operating costs. The approximate costs for implementing this MCM are $25,000 for setup and $429,400 for street sweeping efforts totaling $454,400.