



**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:

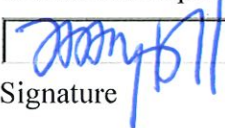
Maryland Department of the Environment, Water and Science Administration
Sediment, Stormwater, and Dam Safety Program
1800 Washington Boulevard, Suite 440, Baltimore, MD 21230-1708
Phone: 410-537-3543 FAX: 410-537-3553
Web Site: www.mde.maryland.gov

Contact Information

Permittee Name:	City of Brunswick, Maryland
Responsible Personnel:	Abigail Hall
Mailing Address:	811 West Potomac Street
	Brunswick, MD
Phone Number(s):	301-834-7500 Ext. 200
Email address:	ahall@brunswickmd.gov
Additional Contact(s):	John Gerstner
Mailing Address:	811 West Potomac Street
	Brunswick, MD 21716
Phone Number(s):	301-834-7500
Email address:	jgerstner@brunswickmd.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.

Abigail Hall		10/31/2024
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:

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

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

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

Total impervious acres untreated in the jurisdiction:

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

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:

BMPs with unverified as-builts or failing inspections are designated as REM and are not considered as providing WQ treatment. Actions will be taken to rectify As-Built records in the next reporting year, or determine a project to validate the BMP.

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

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:

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:

General Program Updates

- **Chesapeake Bay Landscape Professional Certification Classes** Four (4) DPW personnel members have attended CBLP classes. One Level 1 Certification class (pending exam), and three employees attended the CBLP for Crews course this year. Essentially, more personnel will have experience in BMP operation and maintenance.
- **Strategic Reorganization: Environmental Programs is now a division of the Department of Public Works!** This strategic realignment allows for an efficient sharing of resources whether it is experience/expertise, data/information, manpower, or funding. This is a key update for the MS4 program allowing regular representation and visibility into the MS4 program. The Environmental Program Manager submits weekly and monthly reports to the Director of Public works for distribution directly to City Administration and the Mayor & Council.

Minor Project Updates

- **Microbioretention Facilities at PD/DPW HQ** The microbioretention areas at 811 W Potomac were replanted with native plants. While the initial plantings were approved species, the city desired more flowering plant types for the flagship building.
- **H Street Raingarden Restoration** A raingarden was (re)discovered on private property following a call from the property owner. A records search revealed site plans as well as legal documents showing a City SWM Easement, therefore placing maintenance responsibility. The city worked with the property owner and the Frederick County to

Major Project Updates (Grants)

- **MDE Most Effective Basins/IIJA: Stream Restoration (Site S-1) Design/Engineering — (Final Permitting!)** This stream restoration remains a leading RAS project and is estimated to provide 50.6 EIA in restoration as well as load reductions in Total Phosphorus (179.3 lb/yr), Total Nitrogen (282.9 lb/yr), and Total Suspended Solids (449K lb/yr). Actual credit amounts will be assessed once the project is constructed. The City will put the project out

Section I: Impervious Area Restoration Reporting

for construction bid as early as February 2025. MDE has communicated that construction funding is available for the project (totaling \$1.6M). Very exciting!

- **MDEM HMGP: Comprehensive SWM & Flooding Plan – Underway** The City applied to the MD Hazard Mitigation Grant Program (HMGP) to fund a *Comprehensive Stormwater Management Plan and Flood Study by Drainage Area*. This plan will assess the entire City by drainage area to identify flood-prone areas (flash and nuisance flooding). The plan will also identify ideal locations for green infrastructure implementation, yielding additional project for our RAS. The city has selected a consultant to develop the document and a kick-off meeting will be held by EOY.
- **MWIFA (Loan) Stream Restoration (Site S-6) – Awarded/Underway** The City applied for grant assistance for a 1,500 LF stream restoration project yielding an estimated 45 AC of EIA credit. The city is currently working with a consultant to finalize the project agreements and SOW.
- **MWIFA (Loan) Septic Connections Phase 1 – Awarded/Underway** The City applied for grant/loan assistance to connect 13 existing septic systems to the wastewater treatment plant (WWTP). Project implementation costs will include design and construction costs for sanitary sewer extension, connection, as well as any roadway trenching. This will yield 3.0 EIA towards our restoration goals. The city is currently working with a consultant to finalize the project agreements and SOW.
- **FEMA BRIC Pond Retrofit (Brunswick Shopping Center — Awarded (Pending Acceptance)** This project upgrades a pond to provide water quality treatment enhancements. Currently the pond only provides quantity. This is considered a high-priority project due to the pond location. High visibility of this project is an opportunity to educate the public on green infrastructure. A contractor has been selected under a design-build basis and we are expecting a SOW and cost estimate by EOY.
- **FEMA BRIC Pond SmartSWM (Brunswick Shopping Center) — Awarded (Pending Acceptance)** This project is installs a SmartSWM weir device that will provide longer-term storage and regulate downstream flow from a stormwater management pond in the Brunswick Crossing development. A contractor has been selected under a design-build basis and we just received the SOW for review.
- **MWIFA (Loan) Septic Connections Phase 2 – Awarded/Underway** The City applied for grant/loan assistance to connect 7 existing septic systems to the wastewater treatment plant (WWTP). Project implementation costs will include design and construction costs for sanitary sewer extension, connection, as well as any roadway trenching. This will yield 1.61 EIA towards our restoration goals. The city is currently working with a consultant to finalize the project agreements and SOW.

Section I: Impervious Area Restoration Reporting

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:

The City is on track and making strategic progress on meeting our restoration targets using grant and City budgeting. The projects identified in our RAS are generally set at this point and represent a variety of methodologies and scales. The city is including future potential projects in the RAS with longterm restoration goals and modified targets in mind.

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

See #2 for a full description of projects and progress on restoration efforts.

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:

The city has been working closely with Frederick County to validate the BMP database, record-by-record. This was a constructive interaction allowing both parties to share and update data as well as to discuss future approaches and opportunities to collaborate. In comparing records on file, we were able to determine which BMPs were pending As-Builts, hence the unknown inspection responsibility and status. It was also refreshing to discuss departmental day-to-day operations at the county and municipal levels.

The City and County received an SWM status update from the developer of Brunswick Crossing (see Attachments). Any SWM Facilities pending final acceptance have been removed from the YR6 BMP Database for the current period and will be re-added as they are fully validated with supporting data following the County's database. Brunswick Crossing Pond #3 is Complete and included on the BMP database for tracking; however, a BMP_ID has not been assigned yet. We used FR24BMP999999 as a placeholder for this year only. There are currently 3 active BMPs in Brunswick Crossing.

Section I: Impervious Area Restoration Reporting

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

The Restoration Activities planned for 2025 include the full launch of our City Street Sweeping program and design of our first Stream Restoration project (Site S-1):

Street Sweeper: Full rollout of the Monthly City-wide Street Sweeping program will be in effect in the next reporting year. (See Map in Attachments).

The city continues to uphold the weekly Potomac Street sweeping schedule using the city's sweeper. This established area and program will remain a weekly effort and maintain a separate Alternative BMP ID from the Monthly Sweeping BMP.

Stream Restoration (Site S-1): Final design and permitting will be complete by the end of January 2025 and we expect to bid the work out early next year. The total estimated construction time is 3-4 months. Schedule considerations include the in-stream work closures as well as phasing of funds. The city was notified by MDE/DNR that construction funds have been set aside for this project.

Section I: Impervious Area Restoration Reporting

6. Describe coordination efforts with other agencies regarding the implementation of impervious area restoration activities:
 1. **MD State Highway Administration (MDSHA):** State Roads MD-17, MD-180, MD-464, and MD-478 bound and/or pass through the City of Brunswick thereby creating opportunities to coordinate in impervious area restoration measures. While we have not had specific negotiations to date, credit trading is something the City is interested in investigating, particularly along MD-17 (Petersville Road)
 2. **CSX:** The City has coordinated with CSX to maintain SD outfalls on/near CSX property. CSX coordination must be carefully coordinated to ensure safety of personnel performing outfall inspections and maintenance (including removing sediment and debris obstructions). Coordination between CSX, Planning & Zoning, and Public Works is ongoing.
 3. **Frederick County Office of Environmental Compliance:** The County maintains SWM facility inspection records. City personnel have coordinated with the County to obtain BMP inspection forms to be consistent with data collection when possible.
 4. **Brunswick Main Street:** Each year BMS conducts a spring clean effort in the downtown area. During this popular event, dozens of bags of trash/debris are collected. This effort prevents solid waste from entering our streams and the Potomac River. Main Street is a powerhouse when it comes to organizing volunteers. MS4 programming looks forward to future opportunities to work with this organization!
 5. **Brunswick Sustainability Committee:** This newly-formed (2024) committee will be an integral component of the City's MS4 program, particularly involving volunteer activities and public outreach, education, and participation. Stream cleanup efforts are planned for 2025 along with invasives species removal efforts. The next invasive removal day is Nov 2, 2024, where we will be digging kudzu crowns.
 6. **Other Local Groups and Committees with goals and interests that support MS4 program:**
 - a. Brunswick AT Community
 - b. C&O Canal Towns
 - c. Bird City
 - d. Wild Potomac (a new 501c3)

Section I: Impervious Area Restoration Reporting

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

We estimate the total cost of the impervious area restoration program for 2025 at \$1,929,000. The projects we have identified are estimated to exceed the restoration target by over 10 AC.

The estimated cost through 2030 is \$4,506,000. The most costly projects are two proposed stream restoration projects. (Let's hear it for grant funding!)

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:

Describe the actions taken to address the complaints:

To clarify, 6 Storm Drain/SWM concerns were reported through the City’s new Community Concern Reporter (ArcGIS Online service). However, these complaints were mostly due to increased runoff or clogged storm drains and not specifically Water Quality observations. City DPW personnel were able to pinpoint the issues and address in a timely manner, such as in cases of clogged inlets or provide recommendations to property owners to stabilize and address stormwater issues on private property. Each case was addressed and closed.

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

- **Annual DPW SWPPP Training:** Each year DPW personnel are required to review the SWPPP Training Procedures. The topics covered in this document include general pollution prevention procedures, but also specific procedures related to the city’s industrial sites.
- **CBLP Level 1:** One (1) DPW member attended the Chesapeake Bay Landscape Professional L-1 Course in Sept 2024. This course provided a hands-on and in-depth overview of sustainable landscape and green infrastructure (GI) practices.
- **CBLP for Crews:** Three (3) DPW personnel members attended CBLP for Crews. Attendees will learn about BMP installation and maintenance methodologies. The city has a goal of amplifying our in-house BMP capabilities using our talented DPW crews.

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

Our target audience includes: property owners (residents, business owners, tenants), City employees, students, trail users, local environmental health enthusiasts, and City contractors.

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):

Social media continues to be an easy and accessible way to reach the public. The city has started a Facebook page for Environmental Programs, and also hosted a webpage accessible from the City's home website for information sharing. Topics posted on this year:

- Pool Draining Protocols (The city developed a Pool Draining SOP providing guidance for homeowners and their neighbors to refer to).
- Frederick County Youth Environmental Summit (Rotary Event)
- Composting at Railroad Days event
- Rain Barrels
- Street Sweeper Introduction and Naming Contest

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

Educational materials were primarily distributed on Facebook Pages and the City's website.

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

We do not currently have a program in place to measure program effectiveness, the aim of Public Education and Outreach continues to focus on the idea that watersheds are scalable and the message that small-scale actions at the property level can and do make a difference in the watershed. Even something as simple and "harmless" as draining a pool can have larger-scale effects if not done properly.

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

Some ideas that we are considering include:

- MS4 booth and demonstration at Brunswick Springfest or Railroad Days.
- ArcGIS Storyboard on the City's BMPs.
- Start an Instagram page with more bite-sized MS4-related messages.

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

\$5,000

MCM #2: Public Involvement and Participation

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

The city's Public Involvement and Participation program is accessible to anyone. The idea is to host a variety of activities that can accommodate skill and capabilities of anyone interested. We have found that tree planting and invasives removal efforts gain a lot of attention. We hope to have the same interest levels in future stream cleanup activities through the Sustainability Committee.

Regular Sustainability Committee members have a broad spectrum of expertise in environmental stewardship, both professionally and personal interest-wise. What we have found is that there is a correlation to MS4 in most areas discussed at meetings which will allow synergies between programs. That is how sustainability should work! MS4 is just one component of sustainability principles.

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

Number of participants at public events:

Quantity of trash and debris removed at clean up events:

Number of employee volunteers participating in sponsored events:

Number of trees planted:

Length of stream cleaned (feet):

Number of storm drains stenciled:

Number of public notices published to facilitate public participation:

Number of public meetings organized:

Total number of attendees at all public meetings:

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

MCM #2: Public Involvement and Participation

No Public Meetings were held that specifically discussed stormwater/MS4 or environmental restoration. The proposed **Comprehensive Stormwater and Flooding Plan** effort will include opportunities for public meetings for input specific to stormwater restoration.

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

The proposed **Comprehensive SWM and Flooding Plan** will follow a master planning approach. This effort will include a public charrette as well as public-facing digital data collection methods. Progress on this plan has been delayed; however, the city has approached a new contractor to work with. This plan is the ideal platform for collecting and integrating public input in one centralized product.

Describe any additional events and activities if applicable:

The City's Sustainability Committee began an Invasive Plant Removal effort to combat kudzu growth scheduled each Saturday through the EOY. During the pilot effort (10/3/2024) we were able to clear approximately 100 SF of ground. This is an intensive procedure involving digging and cutting of kudzu crowns.

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

- **Invasives Removal** - Kudzu Abatement every Saturday through EOY.
- **Stream Clean Up** – Date TBD
- **Spring Clean Up** – Solid Waste Removal (Brunswick Main Street) -- April
- **Tree Planting** -- Ballfields and along Cummings Avenue

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

\$3,000

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:

[Our IDDE and MS4 Map is included in the Attachments.](#)

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 Brunswick Code of Ordinances Section 4-2404 Discharge to and Use of Public Sewers prohibits illicit discharges to the public sewer system. Additionally, per Section 4-1304 of the City Code, the City of Brunswick has adopted the Frederick County Stormwater Management Requirements in the County Stormwater Management Ordinance. Violations of this Ordinance are considered a civil infraction and enforceable as such.](#)

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

[See the City of Brunswick Code of Ordinances, Section 4-2411 Powers and Authority of Inspectors. Additionally, the City of Brunswick has adopted the International Property Maintenance Code \(IPMC\) in the Code of Ordinances by reference \(Section 7-1501\) which also allows for entry to private property for inspections.](#)

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:

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

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:

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:

Priority areas include industrial and commercial areas or locations where infrastructure is aging. Outfalls selected for screening include those that may produce a single representative sample from the identified priority area. Locations with long storm drain runs (multiple inlets, larger drainage areas) in residential locations were also selected.

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

How many outfalls are identified on the map?

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)?

How many outfalls were screened for dry weather flows?

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

Annually

At what frequency were outfalls screened during the reporting period?

Annually. 36 Screenings occurred in 2023; however, all 50 identified outfalls were screened in 2024. Environmental Programs trained an additional employee to assist with this past year's outfall screenings. Outfall screenings will be a 2 person effort going forward allowing the City to conduct screenings as the program intends.

How many dry weather flows were observed?

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

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

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

The City investigated one potential ID by following the pipe network up to all receiving inlets. Storm drain grates were pulled to allow full access. Each inlet was dry and the flow was determined to be groundwater Inflow & Infiltration (I&I) as observed in other outfalls.

7. Describe maintenance or corrective actions undertaken during this reporting period to address erosion, debris buildup, sediment accumulation, or blockage problems:

The leading corrective action observed at outfalls was minor vegetative growth. Minor issues were cleared while on site by hand or using a weed eater. Several outfalls required Public Works support to remove logs and debris buildup to clear the invert-outs and outflow swale channels. Please see the attached **2023 Outfall Maintenance Work Request** provided to the Public Works Department.

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:

No confirmed Illicit Discharges were detected during this reporting period. See MCM # 6 for information on Spill Response in the City of Brunswick.

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:

High-level/general information links are available on the City of Brunswick's Environmental Programs page of the website. We are starting to post IDDE/and spill response information to the Environmental Programs Facebook page, such as the newly developed SOP on Residential Pool Draining.

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

The city also placed 7 No Dumping signs in areas where yard debris and trash appeared to be intentionally placed, such as dead end roads that fall towards ravines and yard waste “hot spots.” Note, the city maintains a yard waste dumpster that is available for public use and open during operating hours Monday - Friday.

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

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

The SWPPP Training Deck and attendance sheets are included in the Attachments and applies to spill prevention on site at DPW facilities, but also citywide occurrences. This document is reviewed and updated as needed.

13. List the cost of implementing this MCM during this permit term:

\$10,000

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:

The City of Brunswick has an MOU in place with the County Permitting Office to ensure all permit requirements are met.

The County Stormwater Management Ordinance (§ 1-15.2-6.1. Permit Requirement) requires that—unless exempt—all SEC and SWM are approved, easements granted, maintenance agreements are recorded, and security is provided for the site prior to obtaining a building or grading permit. The Department of Permits and Inspections and SCD conduct all permit reviews. Approval is given once all requirements are met.

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:

At the City level, complaints are typically received investigated by the City's Certified Stormwater Inspector and Public Works personnel. If the complaint is a legitimate violation, it is elevated to the Frederick County Inspector(s) for enforcement. The City assists in coordinating as needed to restore compliance.

Provide a list of all complaints and summary of actions taken to resolve them:

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

Provide a list of all construction projects and disturbed areas:

- Ongoing: Brunswick Crossing PUD (2024: 137 SFDs, 2023: 38 SFDs)
- 2022: WB Tower Relocation
- 2022-2023: Brunswick Elementary School Reconstruction
- 2022-2023: Brunswick Police and DPW Headquarters Construction
- 2023-2024: Residences at Railroad Square
- 2024: Brunswick Crossing Pond Renovation
- 2023-2024: MDOT MD 17 (Petersville Road) Roundabout

Does the permittee submit grading reports to MDE (only applies if the permittee has an MDE approved ordinance)?

Yes No N/A

MCM #4: Construction Site Stormwater Runoff Control

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):

1

Describe the status of enforcement activities:

Residences at Railroad Square: Site Sediment and Erosion Controls were reestablished and released sediment was shoveled and swept from affected areas. The site has since been stabilized and building construction activity has moved to the building interior.

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:

Please consult with Frederick County for ESC Inspection Records.

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

Yes No

If No, explain:

Please consult with Frederick County for ESC Inspection Records.

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

1

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

The City of Brunswick has an strong working relationship with the Frederick County Office of Environmental Compliance. The City communicates primarily with the Supervisor and directly with inspectors on an as needed basis regarding specific projects.

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

\$3,000

MCM #5: Post Construction Stormwater Management

Stormwater Management Program Procedures, Ordinances, and Legal Authority	
1. Does the permittee have an MDE approved ordinance?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Has the permittee submitted modifications to MDE?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Has the adopted ordinance been submitted to MDE?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
If No, is the adopted ordinance attached?	<input type="checkbox"/> Yes <input type="checkbox"/> 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? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
If Yes, check all that apply:	
<input checked="" type="checkbox"/> Plan Review and Approval	
<input checked="" type="checkbox"/> First Year Post Construction Inspections	
<input checked="" type="checkbox"/> As-Built Plan Approval	
<input checked="" type="checkbox"/> Post Construction Triennial Inspections	
<input checked="" type="checkbox"/> Enforcement	
<input checked="" type="checkbox"/> 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? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Describe the status of the database and efforts to complete all data fields: The City of Brunswick coordinated with the Frederick County Office of Environmental Compliance and Office of GIS to update the BMP database to cross reference BMP IDs and validate facilities. During this effort, it was determined that three BMPs that the city added to the list are not on county record, likely due to missing As-Builts. Once As-Built documentation has been performed or found in records, we will confirm inspection responsibility. This also provided an opportunity to confirm construction status timelines with Pleasants Development regarding the BMPs in Brunswick Crossing. This was a constructive coordination effort for all departments/agencies and sets us up for success in the next reporting year— a major win!	
BMP Database actions planned for the next year include:	
<ul style="list-style-type: none">• Obtain As-Built documentation the WWTP Sand Filter. (City)• Obtain As-Built documentation Bioretention at the DPW Equipment Storage Facility. (City)• Locate As-Built documentation for the UG Sandfilters at Brunswick Storage (Frederick Co.)	

MCM #5: Post Construction Stormwater Management

2. Total number of triennial inspections performed:

Total number of BMPs jurisdiction-wide:

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:

Triennial inspections of all KNOWN and validate BMPs has been performed on schedule. BMPs pending validation will be conducted once As-Builts have been obtained.

Are BMP inspection records retained and available to MDE during field review of local programs?

Yes No

3. Total number of violation notices issued:

Describe efforts to bring BMPs into compliance and the status of enforcement activities within the jurisdiction:

The Pond at Brunswick Shopping Center (FR23BMP000932) failed inspection for tree growth in the embankment and a washout of the inflow structure causing parking lot damage constituting a safety issue. Resolving this violation and stabilizing the BMP involves two property owners and is multi-disciplinary. Therefore, an All-Hands meeting is proposed to determine short- and long-term actions as well as responsibilities to bring the pond into compliance. Attendees will Include: Frederick County Environmental Compliance; Brunswick Offices of: P&Z, Code Enforcement, and DPW; Shopping Center Owner; and Brunswick Apartments owner.

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):

If any potential violations are reported or observed in between triennial inspections, the City contacts Frederick County to coordinate enforcement and compliance. We have great communication with the County and are able to approach each individual case effectively.

MCM #5: Post Construction Stormwater Management

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

Number of publicly owned BMPs:

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

Publicly owned BMPs are weeded and mowed as a regular part of DPW mowing rounds. More involved maintenance, such as woody vegetation removal or deposition abatement occurs as needed, and usually within a day or two of the Stormwater Inspector report to DPW. Three DPW personnel member recently attended the CBLP for Crews training to gain specific knowledge regarding BMP maintenance and operation.

Microbioretention areas, such as those at 811 W Potomac St (PD/DPW HQ) are maintained more regularly, primarily via weeding, as they also act as landscaping features in a high visibility area.

The city recently purchased a soil sample probe to assess BMP media. This tool will allow us to determine how well BMPs are draining and if a media replacement is warranted.

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:

The City is continuing to build upon our collective knowledge of BMP operation and maintenance. Five DPW personnel members attended Chesapeake Bay Landscape Professional training workshops this year.

The CBLP for Crews class was held 10/30/2024. The Environmental Programs Manager will have a debrief with DPW personnel. Collectively, we will use gained knowledge and the CBLP materials supplied to improve our BMP maintenance protocols and checklist.

MCM #5: Post Construction Stormwater Management

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

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

- DPW Staff Member to take CBLP Level 1 Exam and sign up for Level 2 class.
- Work with all parties to bring Brunswick Shopping Center Pond into compliance.
- Apply for grant funding to re-establish the BMP at Kim Weddle Park and upgrade it to a sand filter or bioretention area.
- Work with DPW personnel to expand the in-house BMP maintenance checklist and schedule using CBLP guidance materials.

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

\$20,000

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:

The SWPPP Training presentation (PDF attached) covers:

- Stormwater Pollution Prevention Plan (SWPPP)
- Spill Response and Notification Protocols
- Proper Vehicle Fueling Techniques
- Used Oil Handling Procedures
- Household Hazardous Waste Handling Procedures
- Used Battery Management
- Spent Solvent and Paint Management
- (New) Street Sweeper Dumpster Practices
- (New) Road Salt Storage Practices
- General Good Housekeeping Practices

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

10/12/2023 and 10/25/2024

Number of staff attended:

MCM #6: Pollution Prevention and Good Housekeeping

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).

2023		
Location of Occurrence	Type of Spill/Release	Status and Details
100 Souder Road – Car Wash	Illegal Autowash Pit Waste Dumping to Open Space	Closed Slope stabilized and pit waste pumping plan instated.
704 E F Street – Residence	Failing Septic	Closed Septic Pit stabilized and property connected to municipal sanitary sewer.
MD 17 Roadway (Near 218 Petersville Road)	Tractor Traylor Oil Spill in Roadway	Closed Loose absorbent placed and swept by MDOT.
215 W B Street – Residence	Home Heating Oil Release to Ground and Sidewalk	Open (See MDE Oil Control Program for Updates) Note: Fully and promptly remediated on Public sidewalk area of exposure.
2024		
6 and 8 E B Street	Home Heating Oil Release to Basement	Open (See MDE Oil Control Program for Updates) Note: Site contained. No exposure to public or adjacent areas occurred.
20 C&O Canal Towpath Rd - WWTP	Diesel Release to pavement surface and Sand Filter	Closed Contaminated soils excavated for disposal. Site restabilized.
Brunswick Street – 300 to 600 Block	Transmission Fluid Leak	Closed Loose absorbent placed and promptly swept.

MCM #6: Pollution Prevention and Good Housekeeping

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

Number of miles swept:

Amount of debris collected from sweeping (indicate units):

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:

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

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:

- Yard waste collection site at 600 Petersville Road; Dumpster emptied when full.
- Public Waste Oil collection relocated to 600 Petersville Road (Public) and 811 W Potomac Street (City Use). Tanks are emptied on a 5-week pumping schedule or when nearing full. Operated by Maryland Environmental Service (MES).
- Street Sweeping (and SD Inlet Waste) Dewatering Dumpster hauled to Frederick County for landfill disposal when full. Liquid effluent is directed via pipe to the municipal Sanitary Sewer.

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

Yes No

[Pesticide Public Agency Permit 9179](#)

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):

[Russell Fader and David Woods](#)

MCM #6: Pollution Prevention and Good Housekeeping

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

Detailed mapping, proper storage, spill prevention, and vehicle identification are key components of the pesticide applicator program.

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):

No fertilizers were applied during this reporting period.

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 City does not pre-treat with deicing solutions, occasionally salt is placed prior to forecasted ice events. Roadway salt and deicer is contained under cover and not exposed to rain or runoff.

Describe good housekeeping BMP alternatives not listed above:

In collaboration and record-comparison with the County, it was determined that the SWM feature at 818 East B Street (BMP ID FRBR19BMP0003) was designed as a stabilized outfall, and not a bioretention area as noted in previous BMP Databases. City of Brunswick DPW cleared the vegetation and debris from the area for assessment. Crews will place new riprap and geotextile to fully restore the outfall this winter (Dec/Jan). The project is expected to take 2-3 days to complete.

The BMP has been removed from the database following communication and instruction from MDE.

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:

The city maintains four ACTIVE General Discharge Permits for Stormwater Associated with Industrial Activities:

Site	Registration No.	Details
DPW Storage Facility 600 Petersville Road	20SW3351	Non Compliance (Missing Records) <u>Response:</u> The City developed an internal inspection schedule to improve Record-Keeping procedures at all sites.
PD & DPW Headquarters 811 W Potomac Street	20SW3720	In Compliance 2024
210 Thirteenth Avenue DPW Equipment Storage Facility	20SW3721	Pending Inspection
20 C&O Canal Towpath Rd. Brunswick WWTP	20SW3111	In Compliance

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

\$20,000