



**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

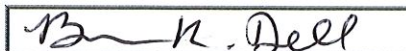
Permittee Name:	City of Brunswick, Maryland
Responsible Personnel:	Bruce Dell
Mailing Address:	1 West Potomac Street Brunswick, MD
Phone Number(s):	301-834-7500 Ext. 300
Email address:	planner@brunswickmd.gov
Additional Contact(s):	Abigail Ingram
Mailing Address:	601 East Potomac Street
Phone Number(s):	301-834-7500 Ext. 303
Email address:	aingram@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.

Bruce Dell

Printed Name



Signature

10/29/21

Date

Reporting Period (State Fiscal Year):

2021

Due Date:

10/31/2020

Date of Submission:

10/30/2020

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 outdated inspection records were flagged as Assumed/Inactive (status=REM). These BMPs were initially included in the RAS as a project line item as a reconciliation effort. However, based on MDE comment guidance, these BMPs were rolled into the baseline calculations and deducted from the untreated area. These BMPs are placed on a priority list to inspect and make repairs, if needed, to ensure adequate performance future reporting. The City will consult with our MDE reviewer, Pet Depkin, for field training on techniques and procedures for BMP facility inspections so that we may conduct them in-house. This training opportunity was mentioned during YR2 review correspondence. We will follow up and look forward to scheduling a field exercise for Spring 2022.

Section I: Impervious Area Restoration Reporting

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

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:

We continue to coordinate with the City Engineering firm to analyze the viability of several locations for potential BMP implementation as opportunities arise. Every development discussion always includes a consideration of stormwater, regardless of the scale of the project.

Our most intensive and costly projects are include stream restoration/bank armoring and velocity-reducing techniques along our main tributaries. These projects get the biggest “bang-for-the-buck” compared to others. As seen across the region, stream corridors in Brunswick are experiencing increased erosion and bank degradation in response to more frequent and intense weather events. These stream restoration projects protect health, ensure safety, and protect critical assets as well as property values while also reducing sediment loads to the Potomac River.

The major stream restoration project on the Brunswick RAS is located in a wooded area with low visibility. Work in this stream corridor presents an opportunity to integrate trail and wayside signage that educates the public on these types of projects and how MS4 funding operates. This is a very costly undertaking and having public/taxpayer visibility is critical. It is important for the taxpayer to understand where their dollars are going, especially when it comes to a sensitive topic like stormwater funding. Integration of trails and signage also helps satisfy MCM #1 Public Education and Outreach.

Older SWM pond conversion is one technique we are still examining to provide water quality in ponds that are currently only providing storage. (A description of the SmartSWM devices included in the Comment Response matrix).

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 continues to investigate all opportunities for BMP implementation as they arise; therefore, we do expect the project list to evolve over the permit period to improve our abilities to achieve compliance. We are actively researching and applying for grant opportunities to aid BMP implementation. The City recently hired an Economic Development Coordinator, who we will be collaborating with on grant opportunities.

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

Progress this past year was slowed due to personnel workloads and availability to advance the program. This combined with the residual effects of pandemic budgeting fallout slowed progress in 2021. No new projects were implemented; however, some adjustments were made to the BMP list and Restoration Schedule. Next year the City expects to see some major traction with the MS4 program and BMP projects.

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:

Per YR2 MDE comments, our BMP database is complete. Revisions have been made accordingly. City personnel are looking forward to working with MDE for guidance and training on stormwater inspections.

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):

While it is no longer a RAS project line item, validation of remaining BMPs is a goal. We expect to have more progress on the design and engineering on our leading stream restoration project.

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 Public Schools:** The Draft Stormwater Report identified potential opportunities to implement or enhance BMP facilities at Brunswick High School and Brunswick Elementary School. These two locations have adequate open space to increase or add new BMP facilities and expand treatment.
4. **Frederick County Office of Environmental Compliance:** The County maintains SWM facility inspection records. While we have worked with the County to obtain updated records, it is apparent that additional ongoing coordination would be beneficial. City personnel have coordinated with the County to obtain BMP inspection forms to be consistent with data collection when possible.

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

Estimated \$1,174,000 with the primary projects comprising expansion of our mechanical street sweeping program, and restoration of a degraded stream channel.