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 Rockville
Responsible Personnel:	Robert DiSpirito, City Manager
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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.

Robert DiSpirito	Robert DiSpirito	10/21/2020
Printed Name	Signature	Date

Reporting Period (State Fiscal Year): 2019 and 2020

Due Date: 10/31/20 **Date of Submission:** 10/31/20

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: 2.862

Total impervious acres treated by stormwater water quality best management practices (BMPs): 583

Total impervious acres treated by BMPs providing partial water quality treatment (multiply acres treated by percent of water quality provided): 282

Total impervious acres treated by nonstructural practices (i.e., rooftop disconnections, non-rooftop disconnections, or vegetated swales): 0

Total impervious acres untreated in the jurisdiction: 2.279

Twenty percent of this total area (this is the restoration requirement): 456

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:

While we identified BMPs that have not been inspected in the last three years, we did not try to modify our baseline calculation for this submission. We plan to ensure that all facilities are inspected before the end of this permit term. If the City is unable to inspect all facilities currently "out of compliance" by year 5 of the permit, staff will modify the area treated for the FY2020 submission. We did clearly mark facilities that have not been inspected within the last three years in our Urban BMP Database.

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

Section I: Impervious Area Restoration Reporting

Has MDE approved the work plan?
☑Yes ☐No

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

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

The City of Rockville (City) has made progress. Staff has addressed all MDE comments on the FY2019 SWM database submission and this is reflected in the FY2020 tables included in this packet. The City continues to reduce the backlog of SWM facility inspections. Unfortunately, the City has not made progress on procuring an Asset Management software and, therefore, still does not have a good solution to track SWM inspection and maintenance records. We will continue to work on fixing this issue in FY2021. Additionally, we have begun discussion with Montgomery County but have not yet developed an MOU. We have modified the *Impervious Area Restoration Work Plan* to represent this schedule shift.

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:

NA, the City has already met the 20 percent treatment goal.

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

Section I: Impervious Area Restoration Reporting

Upon request, the City of Rockville would be happy to provide specific information and/or a tour of any of the restoration projects listed as complete on the Restoration Activity Schedule.

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

   Is the database complete?
   ☑ Yes ☐ No

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

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

   Please see the City's *Restoration Activity Schedule*. These activities have already been implemented.

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

   The City is currently working with Montgomery County to formalize a process for receiving inspection and maintenance records for BMPs treating county and school property. We are also trying to identify which jurisdiction will take credit for treatment when drainage areas cross jurisdictional boundaries. We plan to develop an MOU in year 3 of this permit cycle. City staff also plans to reach out to WMATA and discuss how to work together to implement our respective permits. You will note that this is the same answer submitted for the FY2019 report. The City has not made as much progress as hoped and therefore this is still the plan.

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

   $ 5,660,214.00 for FY20. Please note: The City achieved its restoration requirement through a mix of public and private implementation work. City staff

cannot accurately estimate the cost of the private investment. This figure represents the City costs for FY20.

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: 61

   Describe the actions taken to address the complaints:

   The City receives water quality complaints in a variety of ways including a spill hotline, direct phone calls, email, inspections, online forms, and staff observation. All complaints are compiled into a database that tracks details on the complaint including the actions taken to address the issue. See attached *IDDE Complaints Tracking Spreadsheet FY2019* and *IDDE Complaints Spreadsheet FY2020* for details.

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

   Employee training focused on the following topics. Examples of the training can be found in MCM 3 and MCM 6.
   - **Illicit discharge detection**
   - **Good Housekeeping in City Operations**
   - **Spill Reporting**
   - **Waste Management**
   - **Pollution Prevention**

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

   Target audiences within the City of Rockville include resident property owners, organization property owners (ex. places of worship, homeowners' associations, other non-profits), business/commercial, youth, and City employees.

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):

   Please see attached *Education and Outreach Materials* spreadsheet for a list of examples indicated above. The City of Rockville stormwater public outreach

program is designed to convey many stormwater issues, topics, and pollution reduction actions to a variety of audiences. To do this, the Environmental Management Division (EMD) works with the City's Public Information Office (PIO) to develop communication plans that outline the messages and methods used to reach specific audiences. See attached *Outreach Program Narrative* for more details.
5. Describe how stormwater educational materials were distributed to the public (e.g., newsletters, website): **Stormwater education materials were distributed to the public through email and print newsletters, presentations, flyers and posters, television programs, social media campaigns, informational booths at community events, public art (storm drains) and the City website.**
6. Describe how educational programs facilitated efforts to reduce pollutants in stormwater runoff: **While we have not yet been able to identify methods to measure the behavior change and pollution reduction that results from our education and outreach, our efforts focus on sharing specific actions that can be taken to reduce pollution based on the most up-to-date science. We also provide direct resources in terms of links, brochures, giveaways and incentives that help facilitate those actions being taken. For example, we not only share the harmful effects of pet waste on local streams but give away free pet waste bag dispensers at local events. Green Your Backyard Information Session presentations educate attendees about how they can reduce stormwater pollution by installing small scale stormwater management techniques and direct them to rebates that can help offset the cost.**
7. Provide a summary of the activities planned for the next reporting cycle: **Due to COVID-19, some outreach and education methods will be more heavily relied upon in the coming reporting cycle while others will be modified or postponed. Our activities will focus on email and print newsletters, social media posts, direct mailings, online surveys, virtual meetings, webpages and videos because they are particularly suited to reaching the public and educating on stormwater while allowing for social distancing. While we do not plan to attend or facilitate large community gatherings, we will be creating opportunities for outreach and education alongside socially distant volunteer efforts and events such as stream cleanups, invasive plant removal workdays, and tree giveaways.**
8. List the total cost of implementing this MCM over the permit term:

$216,218.00 total for the two years outlined in this report.

MCM #2: Public Involvement and Participation

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

   Our involvement and participation programs, including volunteer programs, events and public meetings, are designed to provide opportunities for a variety of audiences and ages to participate directly in reducing stormwater pollution or spreading awareness.

   The City offers many opportunities for a variety of audiences and ages including:

   - **Public meetings for stormwater capital improvement projects that encourage participation and feedback from neighborhood groups and individual residents.**
   - **Industry focused meetings to solicit feedback from business and commercial property owners.**
   - **An Adopt A Stream Program that engages community groups such as homeowners' associations, scout troops, businesses, and places of worship in taking ownership of local streams and holding litter cleanups at least twice a year.**
   - **A Storm Drain Marking Program that provides an opportunity for elementary and middle school students to take part in a simple action that can spread the message that storm drains run directly to our local streams. The storm drain placards used in the program also include the City's pollution hotline number.**
   - **Storm drain mural painting projects for local groups such as internal City camps, external youth camps, school art or science teachers and classes, artists or local non-profit property owners.**
   - **Invasive plant removal events and a Weed Warrior Program that provide an opportunity for older children and adults to take part in improving the biodiversity, and therefore health of the watersheds, in City parks.**

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

   Number of participants at public events: 704

   Quantity of trash and debris removed at clean up events: 455 bags

   Number of employee volunteers participating in sponsored events: 10

MCM #2: Public Involvement and Participation

Number of trees planted:	336
Length of stream cleaned (feet):	58.485.04
Number of storm drains stenciled:	48
Number of public notices published to facilitate public participation:	*
Number of public meetings organized:	15
Total number of attendees at all public meetings:	64

*** We do not currently track the number of notices that are sent out to advertise public meetings. For CIP related public meeting, notices are mailed to all addresses within the neighborhood or area affected by the project. For commercial inspection program public meetings, notices were sent to all potentially impacted industries.**

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

Most public meetings related to stormwater are held for stormwater capital improvement projects (CIP) in association with the 30%, 60%, and 90% design phase milestones. All stormwater CIP public meetings include an introduction to stormwater and how the project relates to improving stormwater pollution and/or volume. The reasons and goals for the project are outlined as well as explaining next steps in the project. During 30% design public meetings, public feedback is solicited. During later phases, the meetings are focused on project progress reports.

In FY20, three meetings were held with representatives from the auto industry to introduce the upcoming stormwater commercial inspection program and solicit feedback from the industry on educational materials and to better balance water quality goals with potential impacts to businesses.

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

As mentioned above, public comments are solicited during 30% design phase public meetings for CIPs. These comments are incorporated into the design and/or project wherever technically and financially feasible.

MCM #2: Public Involvement and Participation

Describe any additional events and activities if applicable:

The City's RainScapes Rebate Program facilitates the installation of small-scale stormwater management techniques on private property by providing education on and rebates for rain barrels, conservation landscapes and rain gardens, tree canopy plantings, pavement removal, and permeable paver retrofits. See attached *RainScapes Rebate Program* attachment for details.

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

While the effects of COVID-19 are still unknown, the City plans to continue efforts to involve community members in stormwater efforts by finding opportunities to engage audiences where they are already gathering, and by partnering with existing events and groups. We will also be creating a plan to engage underserved and more diverse audiences in our programs. We have committed to partnering with the Department of Recreation and Parks to host a youth conservation corps program that would engage people of color in environmental issues and help to improve access to nature.

We have also developed COVID-19 safety guidelines that will allow many of our volunteer and engagement programs to resume during their normal seasons and plan to host a no-contact tree giveaway in fall 2020.

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

$216,218.00 total for the two years outlined in this report.

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:

   The City has previously submitted the *Storm Drain Network* Map. This year we are including the C*ommercial Facilities Within the City of Rockville Map* (Target properties for the Commercial Inspection Program)

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 City has the Water Quality Protection Ordinance that prohibits illicit discharges into the storm drain system and stream network and codifies compliance and administrative enforcement. *Chapter 23.5* is included as an attachment.

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

   The provision of the City Code, Sec. 23.5-31(a), grants right of entry for inspections, investigations, and monitoring. Our IDDE program inspects properties for discharges and best management practices. Well established inspection programs, such as the fats, oils and grease (FOG) program, are performed unscheduled to determine how business and best management practices are implemented. Newer programs (auto and eventually stonecutter programs et. al.) are scheduled to allow for the business owners to "prepare" for the inspection. The inspector arrives at the selected time and discusses program initiatives and issues that need to be fixed for future visits. Subsequent visits with these sectors will be unscheduled. For all programs after the initial inspection, if an activity is identified that is not consistent with our code, an investigation will ensue. Procedures for eliminating discharges include annual inspections,

distribution of outreach materials describing BMPs, and enforcement action (NOVs and penalties) with compliance plans (timelines for meeting City code requirements).

The City uses the authority granted within Chapter 23.5 to access a property when needed if investigating an active discharge.

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:

Under the last permit cycle, the City submitted an SOP for *Dry Weather Discharge/Outfall Inspection* and *Spill Response Procedures*. Both are again submitted in this packet for your reference. However, the City is refocusing its IDDE program to one that stops pollution at its source. This new program will target inspections of commercial facilities including food service establishments, auto businesses, stone cutters, large retail centers, and smaller, light-industrial businesses, such as landscapers and carpet cleaners, whose business processes have the potential to discharge. SOPS related to this pollution prevention program includes *FOG Program SOPs.* Our FOG program is well established and has been implemented for the last seven years. The *FOG Program SOPs* are included in this packet for your review. Our commercial inspection program was recently launched and follows the inspection procedures and enforcement guidelines established in the FOG SOP however the specific program SOPs are still being developed. The City will submit these SOPs for MDE review when they are complete.

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:

MDE has approved the *Dry Weather Discharge/Outfall Inspection* and *Spill Response Procedures*. The *FOG Program SOPs* are attached for MDE approval. Please note: SOPs are constantly evolving documents that are updated often as new information or new techniques come to light. We will submit relevant updates to MDE.

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

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

   Prior MS4 permit reporting describes our strategy to inspect outfalls for dry weather flows. Since the prior submission, the City of Rockville, with MDE approval, refocused our efforts on pollution prevention by carrying out targeted property inspections. Our IDDE program is overhauled to address possible points of discharge, namely commercial facilities that have the potential to release contaminants into our storm drains including food service establishment (FSE) SSOs. Our program has prioritized the largest sector business first (FSEs) and has, over the last year, expanded to include the automotive industry. Next year we plan on adding stone cutting businesses to our inspection docket.

   The businesses identified for the commercial inspection program represent potential discharges in the City's storm drain system. There are approximately 330 FSE in the City, 150 auto businesses, 40 stone cutters, 14 landscapers, and six large retail (540 points of discharge). In FY19, 181 FSEs were inspected and the auto inspection program was developed. In FY20 there were 150 FSE inspections and two auto business inspections. In FY20 we performed outreach events to discuss this new inspection program to businesses. Our auto inspection momentum was cut short due to COVID shelter in place restrictions implemented in March.

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

   How many outfalls are identified on the map? 540*

   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)? 108

   How many outfalls were screened for dry weather flows? 332*

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

   The City's goal is to inspect all commercial properties biannually, with a 30% target completion each year.

Fiscal Year	Number of Inspections
FY19	181
FY 20	152

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

***The 540 outfalls noted above represent the number of businesses to be inspected, rather than the 419 outfalls located within the City of Rockville.**

At what frequency were outfalls screened during the reporting period?

How many dry weather flows were observed? 0

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:

Illicit Discharges are identified in multiple ways ranging from routine stream inspections to resident reports. A spreadsheet is maintained of all Illicit Discharges investigated in the City and includes the date of occurrence, address, location, cause, amount, method of investigation, compliance method implemented, and resolution. Attached is *IDDE Complaints Tracking Spreadsheet FY2019* and *IDDE Complaints Spreadsheet FY2020*.

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

   Under the prior approved SOP for Dry Weather Discharge/Outfall Inspections, maintenance needs were identified by environmental inspectors who tabulated the findings and forwarded the structures needing maintenance to the appropriate City staff. City staff plan to inspect outfalls once during this permit cycle to identify additional maintenance needs. Additionally, the City maintains a spill response unit that is deployed to contain and remediate spills of approximately 25 gallons or less. The City also has a contact to obtain emergency spill response support when needed.

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:

Four spills associated with NOVs were issued with directives to clean up the material. Three of the NOVs were issued with penalty. All penalty fees were collected with compliance received.

The tracking sheets *IDDE Complaints Tracking Spreadsheet FY2019* and *IDDE Complaints Spreadsheet FY2020* is attached.

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:

Use	Title
Notify neighborhood when dumping, etc. occurs	***Stormwater Pollution Found in the Area***
FOG Outreach	***Food Service Establishments-Fats, Oils, and Grease-What is Rockville Doing About FOG?***
Notify residents up-stream of an SSO and how they can help prevent it in the future	***Help Prevent Sewer Blockages in your Area***
BMPs for auto inspection	***Commercial Inspection pamphlet***
Poster of Dos and Don'ts for Automotive sector	***We Prevent Pollution-Keeping Fluids out of Our Streams***

Door hangers are used when an IDDE is associated with a resident.

During inspections, outreach materials are distributed to highlight best management practices to avoid spills. Some of the outreach materials used for FOG and the auto program are attached: *FOG, We Prevent Pollution, and Commercial Inspection Booklet.*

11. Specify the number of employees trained in illicit discharge detection and spill prevention: 340

Fiscal Year	Number of Employees

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

FY 19	**162**
FY 20	**178**

12. Provide examples of training materials. If not available, describe plans to develop employee training and submit examples with the next Progress Report:
    New employees receive IDDE identification and notification training. Field staff (i.e., road crews, athletic field maintenance and police, etc.) receive spill containment and response and IDDE identification training.

Audience	**Training Title**
New Employees	***IDDE Card; Safety Orientation Slides (Reporting Illicit Discharge: IDDE)***
Refuse and Recycling	***SWPPP/Spill Response Training 2019 (R and R)***
Field Crews/ Stockroom/ Fleet Services	***SWPPP/Spill Response Training (2019)***

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

    $393,198.00 total for the two years outlined in this report.

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:

Residential and Commercial Building (BLD) permits for development projects have a Department of Public Works (DPW) sign-off as a required activity before they can be issued. DPW is responsible for review and approval of Sediment Control plans and Permits (SCP). Prior to DPW sign-off of a BLD permit, staff ensures that all stormwater related permits, including SCPs have been issued in advance. The City does not have a grading permit. The City also requires evidence of any needed permit authorization from the State. These state permits are referenced in the permit conditions. The City's permit software requires that staff ensure a state Construction NPDES permit is obtained (if needed) before an SCP permit is issued.

Erosion & Sediment Control Program Implementation Information

MCM #4: Construction Site Stormwater Runoff Control

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:

   Complaints can be received from multiple sources, including but not limited to, online complaints, other City staff referrals, and phone calls. Complaints are evaluated and investigated within 1 business day of receipt during normal working hours. After the issue is assessed, the inspector determines if the complaint was credible and develops the appropriate response and/or enforcement action if necessary. A follow up to the complainant is sent once the investigation concludes.

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

   See attached *Complaints Received FY19FY20* excel sheet for more details.

2. Total number of active construction projects within the reporting period: 76

   Provide a list of all construction projects and disturbed areas:

   See attached *FY19 FY20 Project Tracking and Disturbances* excel sheet for more details.

   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):
   378

   Describe the status of enforcement activities:

   All active enforcement actions have been settled and resolved with the exception of one outstanding penalty payment.

   See attached *Total Violations FY19FY20* for more information.

MCM #4: Construction Site Stormwater Runoff Control

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:

See attached *COR Sediment and Erosion Control Program SOP's Version 5* for more information.

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

☑ Yes ☐ No

If No, explain:

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

   3

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

   No external entities are involved in the City of Rockville's implementation of MCM # 4. The City's Engineering and Environmental Management Divisions of the Department of Public Works coordinate in the operation of this program.

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

   $393,198.00 total for the two years outlined in this report.

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

1. 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:

City staff has responded to the feedback received from MDE on FY2019's submittal and believe most issues were corrected. Outstanding items are as follows:

- **The City is still coordinating with Montgomery County to set up a process for receiving inspection and maintenance records for County owned and/or maintained property. We have identified differences between our SWM facility inventories and are in the process of identifying one, common data set. By the FY2021 database submission, the City should have either, the inspection records, or a schedule for when out-of-compliance, county-maintained facilities will be inspected.**

- **We continue to refine the process for getting new SWM facilities into our database and hope to continue to reduce the number of facilities that have not been inspected in the last 3 years.**
- **We continue to refine the inspection tracking database so we can extract when a facility fails its first inspection, gets reinspected and passes vs. just when it passes inspection. In the FY19 submission, staff assumed that if there was an inspection record within 3 months of an "initial inspection", we could count that as a reinspection. However, after further analysis of the data, we do not believe that is a good assumption. For this FY20 submission we only provide one inspection date.**
- **The City still needs to develop a systematic approach to inspecting stream projects. Stream restoration projects are not being inspected in a timely manner.**

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2. Total number of triennial inspections performed: 533

Total number of BMPs jurisdiction-wide: 984

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:

City staff is doing three things to try and catch up on past inspections:

- **Better coordinate with Montgomery County to ensure county owned facilities are being inspected/maintained and that the City receives those records in a timely manner.**
- **Work to get an asset management system that allows for better tracking of facilities and their inspection dates. We are concerned that the facilities in the database are not accurately "coming up for inspection" in our current system and, therefore, are being missed.**
- **Identify and train staff to perform the inspection of stream restorations using Chesapeake Bay Program methods.**

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

MCM #5: Post Construction Stormwater Management

3. Total number of violation notices issued: 8

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

The number included above is the number of compliance assistance actions the City has performed over the past two years and not NOVs. The City is relying heavily on compliance assistance and has seen very good results with this process. If cleanouts/maintenance is not performed in a timely manner, additional warning letters are sent out. These warning letters clearly define the action required, provide an avenue to negotiate action timelines (they can request deadline extensions) and introduce enforcement options (like fines) the City can take if cleanout/maintenance is not performed. The City has been flexible and extended the deadlines by which action was needed and as a result has gotten compliance with cleanout and maintenance requirements.

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):

NA

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

Please see *FY19-FY20 COR SWM Facility Maintenance Report.*

Number of publicly owned BMPs: 214

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

BMPs are maintained on an as-needed basis. The City performs general trash pick-up and low flow debris removal/unclogging on the most frequent basis. All dams are mowed at least once a year. Underground filters are cleaned based on inspection results which occur between once every year to once every three years depending on the type and location of the facility. Funding permitting, the City vacuums pervious pavement installations twice a year and at a minimum of once a year if funding is limited. The City is still refining it's bioretention, green roof, and other landscaped ESD facility maintenance. We are trying to increase the routine maintenance on these facilities to three to four times a year. Currently we work on them one to two times a year.

MCM #5: Post Construction Stormwater Management

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

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

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

The City is in the beginning stages of developing SOPs for its public SWM facility program. We are fortunate to have seasoned personnel with extensive institutional knowledge running the program. However, we are currently drafting maintenance checklists and programmatic SOPs so additional staff can perform this work if needed.

6. Number of staff trained in proper BMP design, performance, inspection, and routine maintenance: 15

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

The City's priority is to find an asset management solution for its SWM facility inspection and maintenance program. It is very difficult to ensure all public and private SWM facilities are inspected and maintained as required while cobbling together different data management methods. We find that inspections fall through the cracks. We also observe that our maintenance actions are not all being captured in a manner usable for reporting or forecasting budgetary needs in the future. We will continue to carryout scheduled inspection and maintenance activities. We will also work on developing SOPs for this program.

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

$2,923,188 total for the two years outlined in this report.

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:
   - **Illicit discharge detection**
   - **Good Housekeeping in City Operations**
   - **Spill Reporting**
   - **Waste Management**
   - **Pollution Prevention**

   Training materials:

Audience	Training Title
New Employees	***IDDE Card; Safety Orientation Slides (Reporting Illicit Discharge: IDDE)***
Refuse and Recycling	***SWPPP/Spill Response Training 2019 (R and R)***
Field Crews/ Stockroom/ Fleet Services	***SWPPP/Spill Response Training (2019)***

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

   Please see *MCM 6 – Employee Good Housekeeping/IDDE Training Dates*

   Number of staff attended: 340 *

Fiscal Year	Number of Employees
FY 19	**162**
FY 20	**178**

   ***This includes both new employee IDDE Training and existing employee good housekeeping/IDDE training.**

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:

   Good housekeeping records are retained for the City's maintenance facility. City staff is still working on formalizing a "SWPPP-like" program at the City's water

treatment plant (WTP). Please note that the WTP staff have extensive SOPs and are carrying out pollution prevention actions. Additionally, the City is in the process of complying with America Water infrastructure Act (AWIA) and an in-depth risk assessment is being performed. Before the end of this permit cycle, the City will be able to provide detailed good housekeeping records for the WTP.

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).

Please refer to 2 *Spill Incident Reporting Forms* attached

Property Name: Date:

Describe observations:

Describe permittee's response:

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

***Rockville does not regularly keep track of amount of debris collected from street sweeping and inlet cleaning. The City does not take alternative credit for these activities.**

Number of miles swept: 2961.74

Amount of debris collected from sweeping (indicate units): NA*

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

The City focuses its street sweeping program on business districts and arterial roads. The City sweeps designated business districts twice a week weather permitting and its arterial roadways once every four weeks. All remaining City-maintained streets are swept twice a year.

Number of inlets cleaned: 157

Fiscal Year	Number of inlets cleaned
FY 19	60
FY 20	97

MCM #6: Pollution Prevention and Good Housekeeping

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

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:

Waste Type	Disposal Method
Street Sweeping and Inlet Cleanings	**The City does not consider this type of debris to be hazardous. Street sweeping and inlet cleaning debris is stored at the City's maintenance facility, once enough debris is accumulated it is hauled away and properly disposed of by a contractor.**
Regular Trash	**Trash is either collected via contractor or City crews and taken directly to the transfer station.**
Hazardous	**The City does not generate large amounts of hazardous waste in its operations. Any such waste is disposed of by licensed hazardous waste contractors.**

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

☑ Yes ☐ No

Rockville has been issued Maryland Department of Agriculture Pesticide Public Agency Permit No. 8989 for its pesticide application program. The City also has a contract with TrueGreen, a licensed pest control company.

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

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

☑ Yes ☐ No

If Yes, list name(s):

See attached MCM 6 – *Pesticide and Fertilizers Applicators*

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

Good housekeeping methods (e.g., integrated pest management, alternative materials/techniques) used by the City in its application of pesticides during the reporting year:

- **All certified applicators attend required annual recertification training**
- **All registered applicators attend an in-house training program**
- **An *Integrated Pest Management Plan* (attached) is employed using thresholds and methods that target specific pests.**
- **Pesticides are stored in a secured posted area as required by law.**

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):

Good housekeeping methods (e.g., application methods, chemical storage, native or low maintenance species, training) used by the City in fertilizer application during the period:

- **Fertilizers are applied using the guidelines and requirements under the State of Maryland's Nutrient Management Laws by certified applicators.**
- **Professional Fertilizer Applicators are required to attend annual recertification training.**

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's Gude Maintenance Facility has a fully covered salt barn for road salt storage. The City makes and uses a brine solution to pretreat the roadway. The City has SOPs to calibrate the salt spreaders at the beginning of each winter season. All new spreaders are automatic and control the amount of salt released based on the speed the truck is going. Operations and Maintenance Division managers have undergone the APWA Winter Maintenance Training which includes courses on salt efficacy and how to assess the amount needed based on forecasted temperature and precipitation.

Describe good housekeeping BMP alternatives not listed above:

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 has General Discharge Permit No. 12SW (NPDES No. MDR00) for Stormwater Discharges Associated with Industrial Activity for its Gude Maintenance Yard.

MCM #6: Pollution Prevention and Good Housekeeping

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

   $1,275,958.00 for the two years outlined in this report.

   $1,275,958.00 for the two years outlined in this report. (Due to document protection controls, this answer could not be entered below question #6.)

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