



Maryland
Department of
the Environment

Wes Moore, Governor
Aruna Miller, Lt. Governor

Serena McIlwain, Secretary
Suzanne E. Dorsey, Deputy Secretary

March 24, 2023

Mr. Paul Mantello, Town Manager
Town of Boonsboro
21 N. Main Street
Boonsboro, MD 21713

Dear Mr. Mantello:

The Maryland Department of the Environment, Water and Science Administration (Department) has completed a review of the Town of Boonsboro's progress report under the National Pollutant Discharge Elimination System (NPDES) General Permit No. 13-IM-5500 for Discharges from Small Municipal Separate Storm Sewer Systems (MS4). The report reflects progress made to meet permit conditions during the period July 1, 2021 through June 30, 2022. Further information is required to demonstrate compliance with the terms and conditions outlined in the permit.

The Progress Report indicated the Town calculated a restoration target of 30 acres and has demonstrated a plan to restore 49 acres, meeting the restoration target and complying with the permit requirement. The Department's full review is attached. Major deficiencies include:

- The Town must submit information for stream restoration projects to verify that they qualify for restoration credit.
- All required information must be entered in the database. A significant amount of information is missing in the current submittal.
- Please continue to plan for restoration implementation beyond 2025. An updated RAS submitted in the 2023 Progress Report should provide an estimate of impervious area restoration implementation through 2030. The Department recommends that the Town should plan for additional restoration equivalent to 10% of the current baseline by 2030. This information will help to inform future permit requirements.

The comments in the attachment shall be addressed in the next progress report due on October 31, 2023, in accordance with Appendix D of the permit. The Department recognizes the significant effort necessary to implement a stormwater program and commends the Town of Boonsboro for its commitment and progress to date. If you have any questions or concerns, please contact me at 410-537-3547 or Michelle.Crawford1@Maryland.gov, or Deborah Cappuccitti at Deborah.Cappuccitti@Maryland.gov or 410-537-3533.

Sincerely,

Michelle Crawford
Natural Resources Planner
Water and Science Administration

Attachment

Town of Boonsboro
Small Municipal Separate Storm Sewer System (MS4) Permit
Maryland Department of the Environment (Department) Review of
Fiscal Year (FY) 2022 MS4 General Permit Progress Report

Reporting

1. The Town of Boonsboro submitted a complete Progress Report Form and included a signature for the appropriate responsible personnel and contact information. This information is required to be updated annually.
2. The next Progress Report is due on October 31, 2023 and must include updates to the impervious area restoration program and responses to comments outlined below including any outstanding questions regarding Minimum Control Measures (MCM).

Section I: Impervious Area Restoration Reporting

3. The Town of Boonsboro calculated an impervious area restoration target of 30 acres based on an estimated untreated impervious area baseline of 148 acres. The Town identified projects that will restore 49 acres by 2025, exceeding the 20% target and including 15 acres of completed projects. Restoration will be accomplished through tree planting and stream restoration projects.
4. The Town has met the permit requirement by demonstrating a plan to meet the 20% restoration target by 2025.
5. The Work Plan was submitted in the required format and included a description of restoration planning activities. The Town continued to install restoration projects and seek funding. An inventory of stormwater management infrastructure, GIS survey, and information dashboard were also being developed to track maintenance and inspection needs. The Town is commended for these efforts.
6. A Restoration Activity Schedule (RAS) was submitted in the required format. Please correct the following:
 - a. All BMPs listed in the RAS and completed must also be listed in the BMP database in Tables B.1.a “All BMPs” and B.1.c “Alternative BMPs”. None of the 13 BMPs listed were found in the submitted BMP database. See further information below in Comment 7a.
 - b. The Town must submit information for the two completed stream restoration projects to verify they qualify for restoration credit: briefly describe the stream’s pre-restoration conditions and the channel design approach. This was requested in the previous year’s review. The Town should also submit this information for the stream restoration project planned for 2023 when it is available.
 - c. Please continue to plan for restoration implementation beyond 2025. An updated RAS submitted in the 2023 Progress Report should provide an estimate of impervious area restoration implementation through 2030. The Department recommends that the Town should plan for additional restoration equivalent to 10% of the current baseline by 2030. This information will help to inform future permit requirements.
 - d. Correct the format for reporting cost. For example \$45,000 should be listed as “45”.
7. A BMP database was submitted in the required format. Please correct the following:
 - a. Enter all BMPs that have been completed for restoration into the BMP database. In the Town’s 2021 submittal, BMPs were listed in Table B.1.c for tree planting and stream restoration but were missing from the current submittal. Ensure all

information for these BMPs is listed in Tables B.1.a “BMP” and B.1.c “ALT”. This must be corrected in the next Progress Report so the Department may verify these BMPs for credit.

- b. All 60 BMPs listed in the database had a current triennial inspection date and a passing status. Please continue working with Washington County to ensure all BMPs are inspected and maintained.
- c. The REPORTING_YEAR field shall be updated annually with the fiscal year of the report being submitted. The next Progress Report should list “2023” i.e., July 1, 2022 through June 30, 2023.
- d. In Table B.1.a “BMP” correct all entries in the “BMP Type” column to match the types in Table B.3 BMP Database Codes in the permit, for example, “SPWED” change to “PWED”.
- e. Complete all required information in the database. This must be completed by the end of the permit term and an update must be submitted in the next Progress Report to receive credit for water quality treatment:
 - i. Ensure all BMPs located within the Town and that are listed in the “ESD” and “ALT” tables are also listed in Table B.1.a “BMP”.
 - ii. Table B.1.b “ESD” complete for all BMPs: ON_OFF_SITE, BMP_STATUS, APPR_DATE, and BUILT_DATE.
 - iii. Table B.1.c “ALT”: No BMPs are listed in the current submittal. List all Alternative BMPs in this table including FPU and STRE. See the permit Appendix B for the full list of BMP types that must be entered here.

MCM #1: Public Education and Outreach

- 8. The Town provided sufficient information to demonstrate compliance with this MCM.
- 9. The Town provided educational materials to the public during tree planting events; was coordinating with Washington County to plan future staff training, and submitted sample educational materials with the Progress Report.
- 10. The Town shall continue to implement this program and provide an update in future Progress Reports as requested by the Department.

MCM #2: Public Involvement and Participation

- 11. The Town provided sufficient information to demonstrate compliance with this MCM.
- 12. The Town engaged 50 members of the public and 2 Town staff at the annual Fall Tree Planting event.
- 13. The Town shall continue to implement this program and provide an update in future Progress Reports as requested by the Department.

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

- 14. Further information must be provided below to demonstrate compliance with this MCM.
- 15. The Town identified 17 outfalls and screened 12 outfalls during the reporting period, observing 12 dry weather flows, and found no potential illicit discharges. A summary and details were submitted. The Town described the investigation and resolution of an illicit discharge that occurred during the reporting period. This is a significant stormwater program component and the Town is congratulated on this achievement.
- 16. The Town planned to develop standard operating procedures (SOP) for screening outfalls after completing its inventory of stormwater management assets. Procedures must be submitted in the next Progress Report to demonstrate compliance with the permit. The Town may reference the following document as a guideline:

https://mde.maryland.gov/programs/Water/StormwaterManagementProgram/Documents/I DDE_SOP_Guidance_MS4PhaseII.pdf

17. The Town shall continue to implement this program and provide an update in future Progress Reports as requested by the Department.

MCM #4: Construction Site Stormwater Runoff Control

18. The Town provided sufficient information to demonstrate compliance with this MCM.

19. The Town described coordination with the Department, Washington County, and the local Soil Conservation District to ensure controls are maintained at construction sites and complaints are resolved. The County submits information to the Department on active construction in the Town, and responds to public complaints.

20. The Town shall continue to implement this program and provide an update in future Progress Reports as requested by the Department.

MCM #5: Post Construction Stormwater Management

21. Further information must be provided below to demonstrate compliance with this MCM.

22. Of the 59 BMPs within the Town, 29 are publicly owned. During the past two fiscal years, 18 inspections were performed and no violation notices were issued. Maintenance activities and coordination with the County were described.

23. The Town planned to develop BMP maintenance checklists and procedures after completing its inventory of stormwater management assets. Procedures for maintenance and any associated checklists are required by the permit and must be submitted with the next Progress Report to show compliance.

24. The Town shall continue to implement this program and provide an update in future Progress Reports as requested by the Department.

MCM #6: Pollution Prevention and Good Housekeeping

25. The Town provided sufficient information to demonstrate compliance with this MCM.

26. The Town described activities including: good housekeeping practices for salt storage and application, covered storage of pesticides and waste vehicle fluids, planning future staff training in partnership with the County, obtaining pesticide applicator certification, developing a good housekeeping plan for applicable Town facilities based on the Town's maintenance shop.

27. The Town shall continue to implement this program and provide an update in future Progress Reports as requested by the Department.

Financial Information

28. The Town reported the total cost for restoration was approximately \$686,000 including \$606,400 in grant funding, and \$34,680 to implement the Minimum Control Measures including a \$5,000 grant. The Department commends the Town for its commitment to maintaining program funding. Please continue to report cost information in future Progress Reports as requested by the Department.