



Maryland

Department of the Environment

Larry Hogan, Governor
Boyd K. Rutherford, Lt. Governor

Ben Grumbles, Secretary
Horacio Tablada, Deputy Secretary

January 16, 2020

Mr. Ethan Strickler
Town of Boonsboro
21 N Main Street
Boonsboro, MD 21713

Dear Mr. Strickler:

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 October 31, 2018 through June 30, 2019. The Department has determined that the submittal meets reporting requirements as outlined in the permit.

The progress report provided an impervious acre baseline assessment and indicated that the Town of Boonsboro's target restoration requirement is initially estimated to be 30 acres. The Town is in the process of finalizing which projects will be used to address the restoration target and is planning on using a combination of stormwater management facility retrofits and alternative stormwater best management practices (BMP). Additional program accomplishments include developing a restoration program work plan. Results of the Department's review are provided as an attachment and includes specific comments for your attention. Some major comments in the attached review include:

- The Town shall submit a copy of the BMP database for Town-owned BMPs. This information is essential for the Town to accurately estimate stormwater management and must be submitted with the next progress report.
- The Town shall submit a restoration activity schedule detailing planned activities that will be used to achieve the restoration target.

The comments in the attachment shall be addressed in the next progress report due on October 31, 2020, 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 on this review, please contact me at Deborah.Cappuccitti@Maryland.gov or 410-537-3533, or Nora Howard at Nora.Howard1@Maryland.gov or 410-537-3768.

Sincerely,

A handwritten signature in black ink, appearing to read "Deborah J. Cappuccitti".

Deborah J. Cappuccitti
Senior Regulatory Compliance Engineer
Water and Science Administration

Attachment

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

Reporting

1. The Progress Report Submittal Form was complete 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, 2020 and must include:
 - Updates to the impervious area restoration progress and responses to all comments outlined below.
 - Progress on program implementation to address the six minimum control measures (MCMs) for the first two years of the permit term (i.e., October 31, 2018 – June 30, 2020). While this information is only required in years 2 and 4, the Department will request any supplemental information related to MCM program development as necessary at any time during the permit term. This will ensure the Town of Boonsboro remains on track for achieving compliance with the permit conditions.
 - Complete the MS4 Progress Report as noted in Appendix D of the permit and include any supplemental attachments in order to thoroughly address reporting requirements.

Impervious Area Baseline Analysis and Urban BMP Database

3. The Town has calculated an initial impervious area restoration target of 30 acres. The methodology used in the impervious area baseline report is acceptable for determining the impervious area restoration target. However, the Town shall continue to revise the restoration target as comments below are addressed.
4. Washington County is responsible for reporting stormwater BMP data to the Department in accordance with the structure outlined in the permit. However, the Town is responsible for maintaining and reporting a database for any restoration BMP that is not reviewed by the County and subsequently, not reported in the County database.
5. The Town is responsible for performing routine maintenance for all Town-owned BMPs.

Work Plan

6. The Town provided an acceptable work plan with the first progress report submittal. The plan provided sufficient detail regarding future efforts including implementing alternative BMPs and dry pond retrofits.
7. The work plan must be updated annually and identify adaptive management strategies for meeting the restoration target.
8. Please consider funding strategies for long term inspection and maintenance needs for all BMPs in future work plans.

Restoration Activity Schedule

9. The Town will submit a restoration activity schedule with the Year 2 progress report. The schedule will include projects selected by the Town including stormwater management facility retrofits and alternative BMP strategies to address the impervious acre restoration target of 30 acres. The Progress Report included a list of potential projects and completed projects that may receive credit.

Funding and Resources

10. The Town will provide an estimate on the total cost of implementing the impervious area restoration program during the permit term with the Year 2 progress report. The Town reported spending approximately \$10,000 in the first year of the permit.
11. Please check the Department's website for available resources related to MS4 program development and guidance for compliance with permit requirements at:
mde.maryland.gov/programs/Water/StormwaterManagementProgram/Pages/NPDES_MS4_New.aspx

Minimum Control Measures

12. Below are the Department's comments on information voluntarily reported by the Town on their progress developing programs under the Minimum Control Measures (MCM).
 - a. MCMs 1 and 2: The Town held several events for education and outreach and measured successes such as attendance and trash collected. Staff training is planned next year. The public may report suspected illicit discharges on the Town website. The Department commends the Town for this progress.
 - b. MCM 3: The Town drafted an ordinance for illicit discharge detection and elimination (IDDE) for Council approval. The ordinance described prohibited discharges and connections, the Town's right of entry for investigating suspected illicit discharges, and enforcement procedures. Standard operating procedures were being developed and a detailed map of the MS4 was submitted with a description of the future screening schedule that included prioritized outfalls to be screened annually.
 - c. MCMs 4 & 5: The Town noted that the County will track and report the following information. The following information is required in future annual reports:
 - i. MCM 4: A list of all construction projects and disturbed areas; Status of enforcement activities; Erosion and sediment control inspection records available to MDE during field review.
 - ii. MCM 5: Ongoing maintenance for Town owned BMPs.
 - iii. The Town reported it will begin tracking records of inspections and maintenance, and develop maintenance checklists.
 - d. MCM 6: The Town contacted the Department to discuss its plans for staff training and good housekeeping activities, as well as receive feedback on their good housekeeping plan template. The Department commends the Town for taking proactive steps to initiate a high quality program.