



**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](http://www.mde.maryland.gov)

**Contact Information**

Permittee Name:	City of Takoma Park MD
Responsible Personnel:	Daryl Braithwaite
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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.

Daryl Braithwaite	Daryl Braithwaite	11/6/20
Printed Name	Signature	Date

**Reporting Period (State Fiscal Year):**

**Due Date:**

**Date of Submission:**

**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:

***There are 141 BMPs within the City boundary. 68 of them are public facilities and the City is directly responsible for the inspection and maintenance of them and the records are complete and up to date. There are 73 permitted BMP's on private property. Of those 9 are incomplete and have not been counted towards the treatment totals.***

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**

*Comments from MDE received on December 23, 2019 outlined the issues to be address in next reporting periods. The restoration work plan has been updated and will be submitted along with this report.*

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 Takoma Park installed its first structural BMP (Bioretention) in 2007. Since then the City has successfully installed a total of sixty-eight (68) such facilities. We have also restored nine hundred and fifty (950) linear feet of stream. We have continued to review and enhance our non-structural practices such as street sweeping, tree planting and storm infrastructure cleaning. Beginning in 2017, the City has been weighing materials collected by the street sweeping operation as well as the materials collected during inlet and storm pipe cleaning and have applied the formula provided on table B.4. to calculate the credit. As of the end of this reporting period, the City has calculated a treatment credit of 98.58 acres of the 109.38 acres required to meet the 20% treatment requirement. The City has identified 5 years of future capital projects for stormwater management that are anticipated to be completed to meet and exceed the treatment requirements within the permit term.*

3. Has a Restoration Schedule been completed and submitted to MDE in accordance with Part V.B, Table 2 of the permit?

Yes  No

*The updated Restoration Schedule is submitted with this report.*

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:

*We plan to annually review and update the Restoration Schedule to keep it accurate as project schedules change or new projects are identified. Methodologies for updating and or revisions will include refinement of the tentative schedules, project scope and budget estimate for projects considered suitable.*

*Effort will be focused on stream restoration and outfall stabilization projects. Refined methodologies will be developed to enhance benefits of alternative BMP's such as urban*

### Section I: Impervious Area Restoration Reporting

*forest tree planting, drainage structure dredging and debris removal to its maximum potential.*

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

*In FY20, the City completed the installation of 4 modular wetland facilities as part of a project on Lincoln Avenue. These facilities provide over 1 inch of treatment for 1.5 impervious acres. Additionally, a bioretention facility was installed at Flower Avenue and Sligo Creek Parkway – a project designed and coordinated with MNCPPC. Also, during this period plans for the first phase of the Takoma Branch Stream restoration were finalized and are at 100 % completion. The first phase of the project encompasses 110 feet along with outfall reconstruction. With permitting at or near conclusion, the completion of is anticipated in late spring to early summer in 2021. Photos of the completed bio retention pond adjacent to Sligo Creek and Flower Avenue Bridge as well as photos from construction the modular wetland installation on Lincoln Avenue are included in the attachment.*

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):

*Restoration activity schedule table is attached to the report. The table provides detail breakdown of each stormwater management projects for next five years. For the next reporting cycle, we plan to complete 110 Ln Ft of stream restoration of the Takoma Branch and install erosion control at a nearby dead-end road (Sligo Mill Rd) impacting the stream, complete outfall stabilization at Brashear's Run, as well as installation of a linear bioretention facility at Grant & Holly Avenues and an outfall stabilization project on Maple Avenue at Brashear's Run.*



## Section I: Impervious Area Restoration Reporting

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

*Coordination continues between the City and Maryland National Capital Parks & Planning Commission (MNCPPC) on stormwater projects within park and stream beds under the MNCPPC jurisdiction. In this reporting cycle, we collaborated with MNCPPC on the design of the outfall stabilization for Brashear's Run. MNCPPC staff developed the design plans in conjunction with City input. The City will be bidding the project to an approved list of Montgomery Parks vendors. The City will provide the funding and oversight for the construction.*

*Also, a MD-DNR permit was secured during this period for the first segment of a stream restoration at Takoma Branch. MNCPPC was also involved in the design development of the Takoma Branch Stream Restoration project. Once final permitting is received the project will be advertised for bid and construction should begin. The entire project may span over several reporting periods.*

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

*City's annual stormwater budget is approximately \$700,000. The funds are used to implement impervious area restoration projects as well as cover staff salaries for the 1.5FTE who oversee the program. The fund is also used to maintain and expand the City's storm drainage structures and network. Each year about \$250,000 is budgeted for Capital Projects, \$150,000 for maintenance and repairs, \$120,000 for video inspections, pipe cleaning and IDDE and \$80,000 for engineering assistance. The remainder is personnel costs. In addition to the dedicated stormwater budget, the City funds several programs through the Public Works operating budget that supplements the stormwater program (leaf collection, street sweeping and tree planting), The City anticipates the budget to remain similarly allocated through the permit term.*

## **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:

1

Describe the actions taken to address the complaints:

*A report was received on January 31, 2020 of observation of extremely muddy water in Sligo Creek downstream from Maple Ave. in Takoma Park. Additionally, the flow in the tributary was reported as much higher than usual long after rain. PW Director visited the site on February 1, 2020. At that time the flow had subsided. It is believed that the cause may have been related to a WSSC trenching operation near Takoma Station Metro. We notified the Montgomery Department of Environmental Program on the same day. No conclusion as to the cause of the discharge was reached.*

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

*An annual pollution prevention training session was last held on September 17, 2019 with twenty-two (22) Public Works Department employees in attendance (Sanitation Streets, Parks and Vehicle Maintenance Divisions). It was a two (2) hour session and provided information about Stormwater Management Program and the Minimum Control Measures required by MS4 Phase II. The training also included information about Best Management Practices for Public Works operations. Attendees took a quiz and discussed the answers.*

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

*The target audiences are the residents and businesses owners living and working within the boundary of the City of Takoma Park. We have also put special emphasis on the youth from preschool to university students and civic groups such as Boy Scouts of America.*

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):

*The City has limited staffing to address public education. As a result most of our programs are static and rely on existing mechanisms to share information, like the City's Newsletter and website.*

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

*1. Takoma Park Monthly Newsletter - April 2020 City Newsletter included an article on the Flower Avenue Green Street (see Appendix). The March and*

*October 2020 editions included information about a program to encourage planting of trees on private property and provided rebate.*

- 2. Takoma Park Quarterly Guide - The Fall 2019 Takoma Park Quarterly Guide included information on the Flower Avenue Green Street project and the Sligo Creek Parkway and Flower Avenue bioretention facility (see Appendix)*
- 3. The City website - <http://takomaparkmd.gov/government/public-works/stormwater-management-program/> has stormwater management information about the permitting process, as well as general information about the City's programs and stormwater issues. The website also provides links to the Maryland Department of Environment and the United States Environmental Protection Agency. The City's NPDES MS-4 compliance reports and Watershed Implementation Plan Phase II reports are also posted on the website.*
- 4. Bus Shelter Posters – The City has an arrangement with our bus shelter provider to use 10 shelter ad spaces each month for public education efforts. The program includes an ad for stormwater, Anti-Litter and Pesticide Restriction “Safe Grow Law”. During this reporting period the Safe Grow Law ad was up in April, 2019 and 2020, the Stormwater Poster in May and June, 2020 and the Anti-Litter Ad in August, 2019. The posters are included as an attachment to this report.*

*The outreach programs listed above reach the residential population of the City. The Newsletter and Quarterly Guide is mailed to every household in the City monthly.*

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

*The efforts have included public messages about not littering, or using pesticides for lawn treatment, as well as increasing public awareness of stormwater and the purpose of BMPs and how they reduce pollution. Newsletter articles provide more detail into the topic to enhance understanding and also reference the City's website where more complete information is accessible.*

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

- ❖ Public meetings: Provide community updates about planned stormwater improvement construction projects*
- ❖ Coordinate with City Television to air new versions of video on public educational material.*
- ❖ Purchase the newer version of education material for personnel training regarding MS4 Phase II requirement*

- ❖ *Work with City TV to produce and air at least one program on Stormwater Management Bio retentions within the City.*
- ❖ *Resume solicitation for volunteers to participate in the Mark A Drain decal installation campaign, special focus on Scouts and Neighborhood Associations.*

8. List the total cost of implementing this MCM over the permit term:  
*An estimated cost is \$7,500 over the permit term. This includes just material expenditures*

## MCM #2: Public Involvement and Participation

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

*Our focus is on the residents within our city. As such our public participation programs are more action oriented – picking up trash in the creek bed, or ones that enhance quality of life, like the Plant A Tree Program. Those are usually good incentives for generating public involvement. We have limited staffing, so rely on the Friends of Sligo Creek for coordination of the trash pickup event.*

*The Mark A Drain campaign has been of interest by the Scouts. They can earn merit badges for their participation and often coordinate with others to make it a larger group.*

*Involvement and participation help enhance public understanding of the type of activities that contribute to reduction or removal of stormwater pollution. This in turn results in community support, a pillar of any successful program. Also, it enhances understanding of our collective role and responsibility in its protection.*

*The quantities listed below were significantly impacted by the COVID pandemic.*

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

*There are four (4) types of public events where residents can participate and facilitate in reducing pollutants in stormwater runoff. The programs are described in detail below:*

*a. Make a Difference – Plant a Tree, Twice a Year Planting Program*

*This program encourages residents to plant over-story trees and is offered twice a year, in the fall and spring. Residents purchase a 1 ½ caliper tree at a discounted price (includes installation and one-year warranty). The City provides an additional \$100 incentive for the first tree purchased. In this reporting period 70 trees were planted on private property through this program (38 Fall, 2019, 32 Spring, 2020).*

*b. Sweep the Creek Program- Friends of Sligo Creek Twice a year*

*Friends of Sligo Creek “Sweep the Creek” events are usually held twice each year, in Fall and Spring. Events in this reporting period took place on September 26 and October 11, 2019. Due to the pandemic the Spring event was cancelled. The data on participants is not published at this time.*

*c. Mark a Drain Campaign - On going*

*The City continues efforts to recruit volunteers to install “No Dumping!” decals storm drains throughout the City’s website at*

<http://publicworks-takomapark.s3.amazonaws.com/public/stormwater/improving-water-quality-inlet-marking-information-booklet.pdf>.

*d. Household Hazardous Waste Collection Day*

*The City’s annual Household Hazardous Waste (HHW) event took place June 15, 2020. Clean Harbors Inc. provided the services. Among the materials collected were over 160 pounds of flammable liquid and 2,240 pounds of liquid pesticides.*

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

*City staff hold public meetings for stormwater quality projects in order to discuss the objectives and process of each project. Public comments and feedback, generally are considered and incorporated into the design.*

Describe any additional events and activities if applicable:

3. Provide a summary of activities planned for the next reporting cycle:  
*The current plan is to continue implementing and monitoring to the extent possible, four (4) annual events (Make a Difference – Plant a Tree, Bi-Annual Planting Program, Sweep the*

**MCM #2: Public Involvement and Participation**

*Creek Program- Friends of Sligo Creek, Mark a Drain Campaign, Household Hazardous Waste Collection Day). Depending on the status of the pandemic, these activities may continue to be impacted in the next reporting year.*

4. List the total cost of implementing this MCM for the permit term:  
*The estimated cost is \$15,000 annually or \$75,000 over the permit term. The cost of the tree planting is funded by the Urban Forest budget and the Household Hazardous Waste Collection Day is funded by the Sanitation Division Budget. The only program listed funded by the Stormwater budget is the Mark A Drain Campaign.*

*Tree planting - The City provides \$100 rebate per tree  
House Hold Hazardous Waste event \$10,000  
Mark Drain Campaign material - up to \$3,000 plus personnel cost*



**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:  
***(Appendix. Conveyance and outfall map)***

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’s relies on enforcement through Montgomery County. Upon report of illicit discharge, City staff notify the Montgomery County Department of Environmental Protection (MCDEP) and inform the Maryland Department of Environment (MDE) as necessary.***

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

***Under the City Code section 16.04.270 “Unsafe Condition-Entry onto property”, city staff is authorized to enter onto private property for the purpose of investigating an issue. Though authorized, staff do try to contact and notify the private property owner before or after making a site visit. Additional investigation would be done by MC DEP staff.***

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:

***The City plans to complete the SOP and submit to the State by November, 2020.***

**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:

***Guidance for developing standard operating procedures for the Illicit Discharge Detection and Elimination program received on August 3, 2020 was utilized in developing this document. Objective is to submit for approval no later than November 2020.***

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:

***The City has a total of 78 outfalls that drain to Sligo Creek and Long Branch Creek watershed. The City water quality monitoring program has been in effect since 2007 and is designed to screen all 78 outfalls annually. During this reporting period, the City contracted with Bay Land Consultants & Designers, Inc. to provide the annual dry weather analysis and outfall evaluation for all 78 outfalls. This year dry weather flow was observed in 13 of 78 outfalls. Water quality samples were obtained and tested for pollutants from these outfalls. Currently the source of dry weather flow is primarily from spring water, ground water and perennial streams.***

***The City primary land use is residential lots. There is limited commercial areas and no industrial locations. For the purposes of prioritizing screening locations, we rely on the past water quality testing results to determine which areas we will more closely investigate to identify the source of pollutants identified by the annual testing.***

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***

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

At what frequency were outfalls screened during the reporting period?

**Annually**

How many dry weather flows were observed?

13

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

3

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

***In compliance with City's SOP for Illicit Discharge Detection and Elimination, once elevated levels of pollutants are detected from outfall water quality testing, investigation back up the system should take place to detect the source. Manholes closest to the outfall should be investigated first, with staff progressively moving up the pipe network and inspecting manholes to determined specifically where the source is coming from. Indicators such as the presence of flow, colors, odors, floatable materials, or deposits or stains shall be used to trace source.***

***In March, 2020, the City contracted Bay Land Consultants to investigate possible illicit discharge source at three outfalls with levels of pollutants exceeding EPA standards detected in the 2019 dry weather sampling. Chlorine, E. coli and enterococci were identified for Outfall #80. E. coli and enterococci for Outfall #212. Enterococci, color, chloride and chlorine for Outfall #1106. These parameters exceeded EPA standards at each of the associated outfalls. Bay Land attempted to track back through the system but did not find conclusive evidence of the source.***

***Tracing related to Outfall #80 included testing back up the line at 3 manholes. Sample results exceeded standards. The outfall exceeded E coli and Enterococci. The first manhole had elevated enterococci, the second manhole exceeded E. Coli and the third exceeded enterococci and chlorine. The chlorine results in the third manhole suggest possible sanitary wastewater contamination.***

***Tracing related to outfall #212 included testing back up the line of 5 manholes. The levels of E coli and enterococci were low in all manholes except the second one which had high enterococci.***

***Tracing related to outfall 1106 included testing back up the line at one manhole for Chloride, Chlorine and color. Both had elevated chloride which could be a result of sewage contamination and water softener discharges. The manhole tested exceeded color indicator could be an indication of sewage, grey water and industrial discharges. (Out fall photos are included in the Appendix)***

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

*The City intends to follow up with CCTV inspections from these outfalls back up the pipe to determine condition of the pipes and also contacting WSSC to request information on the location of sewer lines in the vicinity of the stormwater system infrastructure and request WSSC investigate waste water system integrity in these locations.*

7. Describe maintenance or corrective actions undertaken during this reporting period to address erosion, debris buildup, sediment accumulation, or blockage problems:  
*To address debris buildup, sediment accumulation or blockage problems, the City performed the following corrective or maintenance actions:*

- 1. Video Pipe Inspection and Cleaning: Every year Department of Public Works obtains contractual support to conduct closed circuit television (CCTV) investigations and cleaning of its stormwater infrastructure. During this reporting period the CCTV inspection and cleaning took place in a portion of Sub-basin 4. The annual funding available for this work is \$55,000. In FY20 8,737 linear feet of pipe was cleaned, as well as 50 inlets and 12.87 tons of debris (wet weight) was removed. When the video work is done, the contractor provided pipe and structure rating to identify any problems or issues that may need to be addressed.*
- 2. Street Sweeping and Vacuum Leaf Collection: Takoma Park maintains a street sweeping program that covers all residential streets and city parking lots. The sweeping cycle runs from March through October each year. The City operates a TYMCO Model 600 BAH sweeper mounted on a 2011 International 4300 DT10m Truck. The sweeper is operated by in-house staff. In addition to the sweeping route, storm drain pipes and inlets are also regularly inspected during and after rain, snow and storm events to ensure proper drainage. In this reporting period, the City sweeper collected 70.2 tons of debris. Street sweeping zones were visited 3 to 6 times during sweeping periods in spring, summer and fall. We have developed a spread sheet to track street sweeping lane-mile coverage.*
- 3. The City operates a 5-week program for vacuum leaf collection. This program plays a significant role in keeping leaf debris out of the storm drain system and thus we considered it as an effective BMP as it reduces leaves from entering the storm drain system and significantly reduces the amount of decaying organic matter entering the stream. The City has started to weight the leaf tonnage collected annually however, we have not incorporated this weight in our pollution reduction computations as of this time.*

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:

*None occurred*

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:

*Webpage: During this reporting period, the City developed a web page that help residents determine whether they are seeing pollution or a naturally occur condition in the stream. Weblink for the page:*

<https://takomaparkmd.gov/government/public-works/stormwater-management-program/what-is-the-stuff-in-the-creeks/>

*Storm Drain Marking Decal: No Dumping decals are posted on storm drains throughout the City. The decal has contact information to report illicit discharge.*

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 training material consisted of presentation, video and quiz purchased from the Excel Visual media called Rain Check - Stormwater Pollution Prevention for MS4s. Training materials can be viewed at: <https://www.excalvisual.com/product-page/rain-check-stormwater-pollution-prevention-for-m-1>*

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

*The annual budget is \$120,000 for video inspection, cleaning and dry weather testing as well as IDDE tracking. Over the 5-year permit term, the total is \$600,000.*

**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:  
***Montgomery County is not to issue a construction permit unless a municipal letter is provided through the City's Planning Office. This Municipal letter informs the applicant of City permit requirements for stormwater, tree protection, driveway apron permits and storage permits. Grading, building permits and sediment and erosion control (S&E) plans are approved by Montgomery County Department of Permitting Services. City reviews stormwater management plan issuing SWM permits and issues stormwater permit. City requires applicant to submit S&E approved plan prior to issuing SWM PERMIT***

**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:

*During this reporting period, erosion and sediment control plan review and inspection during construction, continue to be performed by Montgomery County's Department of Permitting Services. City staff has, however, actively observed and worked closely with Montgomery County inspectors regarding identifying compliance issues. No complaints were registered during this period.*

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:

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):

Describe the status of enforcement activities:  
*The status remains unchanged*

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:

*City staff routinely observe construction sites for implementation of erosion and sediment control practices and their effectiveness, especially during storm events. Related issues of concern that are identified during storm events are generally handled by City staff by taking necessary action or informing Montgomery County inspectors of potential enforcement required. The City does not have authority to suspend building or grading permit.*

Are erosion and sediment control inspection records retained and available to MDE during field review of local programs?  
 Yes  No

**MCM #4: Construction Site Stormwater Runoff Control**

If No, explain:

***Inspection is performed by Montgomery County Inspectors and the inspection records are retained by the County.***

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

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

***The coordination is limited to Montgomery County.***

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

***The cost associated with this MCM is staff time and all staff are salaried. Hours spent on specific topics or inspection is not monitored.***



**MCM #5: Post Construction Stormwater Management**

<b>Stormwater Management Program Procedures, Ordinances, and Legal Authority</b>	
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 checked="" type="checkbox"/> Yes <input 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
1.	Does the permittee have a memorandum of understanding (MOU) with the County to perform any or all requirements for an acceptable stormwater program? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
	If Yes, check all that apply: <input type="checkbox"/> Plan Review and Approval <input type="checkbox"/> First Year Post Construction Inspections <input type="checkbox"/> As-Built Plan Approval <input type="checkbox"/> Post Construction Triennial Inspections <input type="checkbox"/> Enforcement <input type="checkbox"/> BMP Tracking and Reporting
<b>Stormwater Management Program Implementation Information</b>	
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:  <i>The urban BMP database is submitted in this reporting period. Of the 141 structural private and public BMPs reported, we have complete records for 132 facilities and we continuing to gather any missing As-Built plans for those remaining. No treatment credit is claimed for any of the 9 facilities without complete records.</i>
2.	Total number of triennial inspections performed: <input type="text" value="64+68=13"/>
	Total number of BMPs jurisdiction-wide: <input type="text" value="141"/>
	Are inspections performed at least once every three years for all BMPs? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

**MCM #5: Post Construction Stormwater Management**

If No, describe how the permittee will catch up on past inspections and remain on track to perform BMP inspections once every three years:

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

Yes  No

3. Total number of violation notices issued:

2

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

***6506 Kansas Ave.: Required facility was not built. City followed up with the owner, facility was constructed. City is waiting As Built documentation.***

***1006 Larch Avenue - Cristo Ray High School: Facility was not maintained, City notified the owner and they are currently working with contractor to restore the facility.***

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):

*N/A*

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

***The City has contracted for maintenance services for 30 of the public facilities. They receive inspection and maintenance 6 times per year. The remaining facilities consisting of bioretention ponds, extended wet and dry ponds as well as permeable pavers, modular wetlands, filtras and a green roof are currently inspected and maintained by City's staff. The activity includes removal of sediment and debris from catch basins and traps, raking and removal of any leaves or debris within the facility surface, removal and replacement of dead vegetation, sweeping or vacuuming permeable pavers to remove collected sediments, trash removal as needed.***

Number of publicly owned BMPs:

68

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

***Thirty of the bioretention facilities receive maintenance and inspection 6 times per year. The remainder of the bio retention facilities and modular wetland systems are inspected and***

**MCM #5: Post Construction Stormwater Management**

***maintained at least twice a year. Permeable pavers are also inspected and vacuumed annually. The green roof receives annual maintenance and supplemental planting.***

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:

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:

***Activities planned for next reporting cycle are:***

- ***Mail Inspection forms for Tri- Annual inspection of Permitted faculties***
- ***Review Inspections form by Owners and perform inspections as necessary on permitted facilities Inspection***
- ***Continue Inspection and maintenance of all publicly owned BMPs***

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

***The estimated cost for the permit term is \$200,000***

***Contract maintenance costs \$35,000 annually***

***In house Inspection and maintenance – Garden Division personnel costs and supplies***

**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:

*They are:*

- *Review of the Stormwater Management Program and the Minimum Control Measures required by MS4 Phase II.*
- *Best Management Practices for Public Works operations*

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

- *September 17, 2019*

Number of staff attended:

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).

Property Name: *Takoma Park Public Works Facility* Date: *8/06/2020*

Describe observations:

***On September 12, 2019, approximately 2 quarts of antifreeze spilled on the Public Works Yard.***

Describe permittee's response:

***Staff put down absorbent pads to catch the antifreeze before it entered into the drain system and dispose of it at a licensed waste disposal site.***

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:

**MCM #6: Pollution Prevention and Good Housekeeping**

*City has subdivided the city streets into 5 zones and digitized in GIS. The Five (5) street sweeping Zones were selected for maximum efficiency. Each Zone is swept on a designated weekday i.e. zones 1 thru 5 will be swept on Monday thru Friday. During this period a spread sheet was developed utilizing the lane -mile method of the credit determination. This method was developed in accordance with Guidance published in 2019. The frequency at which each street mile is swept was recorded enabling determination of Equivalent Impervious Acre (EIA) credit. The spread sheet along with our GIS mapping enhancement may also serve as tools enabling evaluation and enhancement of the street sweeping program.*

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:

*Trash and debris collected from street sweeping and inlet cleaning are transported to the Waste Management Transfer facility located at District of Columbia (DC). The City has hired Clean Harbor Inc. to safely dispose of hazardous material that are generated at the City owned properties and all hazardous items that are collected from the residents on the drop off day. The event is held the first Saturday in June.*

Does the permittee have a current State of Maryland public agency permit to apply pesticides?  
 Yes  No

If No, explain (e.g., contractor applies pesticides):  
*City does not apply pesticide*

Does the permittee employ at least one individual certified in pesticide application?  
 Yes  No

If Yes, list name(s):

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

**No pesticides were applied**

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**

**MCM #6: Pollution Prevention and Good Housekeeping**

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):

*Salt used for snow and ice control is stored in a water proof facility with a domed vinyl roof. Prior to each salt truck deployment, the staff calibrate the spreaders to ensure they are working appropriately. After events where road salt was used, the City runs the street sweeper over the streets to pick up excess piles and remove salt from the roadway surface*

Describe good housekeeping BMP alternatives not listed above:

*Seasonal Leave Collection*

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:

*City's Public Work Facility has received a permit for industrial discharge.*

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

*The cost associated with this MCM is staff time and all staff are salaried. Hours spent on specific topics or inspection is not monitored. The street sweeping and leaf collection program are funded through the Streets and Parks Division. The inlet cleaning is funded in the Stormwater budget.*

*The overall cost is broken down as follows:*

*Annual sweeping    \$10,000*

*Inlet cleaning       \$55,000*

*Leaf Collection      \$74,000*

*\$ 139,000.00 / year or \$695,000 for 5 years*

## ATTACHMENT 1

Bus Shelter Ads – Anti-Litter, Stormwater and Plastic Ban



Neighborhood Services  
**Public Service Announcement**

# Litter lingers

Protect our streets and wildlife

Keep our City **Clean and Green!**



Reduce, Reuse,  
Recycle!



Always put trash  
in the can!



Dispose of cigarette  
waste properly!





Department of Public Works  
**Stormwater Management**

# When it rains



# it drains.



## Keep our water clean!



**No lawn care  
pesticide!**



**Make sure your  
car isn't leaking  
fluid!**



**Scoop up after  
your pet!**

[takomaparkmd.gov](http://takomaparkmd.gov)





## Servicios Barriales Anuncio de servicio público

# El plástico contamina nuestras

Dile "adiós" a los plásticos de un solo uso en Takoma Park.



No uses bolsas de plástico



No uses pajillas de plástico



No uses poliestireno



## ¡Avanza hacia un futuro sostenible!



Trae tu propia bolsa



Usa pajillas de bambú



Compra tazas reutilizables

[takomaparkmd.gov](http://takomaparkmd.gov)





# Neighborhood Services Public Service Announcement

## Plastic pollutes our streams

Say "so long" to single-use plastics  
in Takoma Park



No plastic bags



No plastic straws



No polystyrene



## Step towards a Sustainable Future!



Bring your own bag



Use bamboo straws



Buy reusable mugs

[takomaparkmd.gov](http://takomaparkmd.gov)

## ATTACHMENT 2

Excerpts from IDDE Report



### 4.3. Photo Documentation of Sampled Outfalls



Photo 1 – Structure #80



Photo 2 – Structure #212



Photo 3 – Structure #1106

## 5. RECOMMENDATIONS

*E. coli* and *Enterococci* are indicators of fecal material contamination for illicit discharge detection. We recommend the City should first contact Washington Suburban Sanitary Commission to see if any sewer pipe rehabilitation is on schedule near the three outfall systems that BayLand tracked. If sewer pipe rehabilitation has not occurred or is not on schedule in these locations, BayLand recommends closed-circuit television (CCTV) pipe inspection services that can be accessed at the outfalls, manholes, inlets or other underground structures. This will allow the City to see the condition of the pipes and determine if exfiltration is occurring. BayLand recommends the following for the individual systems that were tracked:

### Outfall #80:

- CCTV beginning at the outfall and upstream of manhole 8003.
  - This will help determine if exfiltration is occurring from the sewer system.

- If chlorine results at outfall #80 for the 2020 outfall screening are high in concentration a hot spot study may be needed at the shopping plaza on Laurel Avenue.

**Outfall #212:**

- CCTV beginning at the outfall and upstream to manhole 21203.
  - This will help determine if there has been septic migration into the storm drain system around manhole 21202

**Outfall #1106:**

- CCTV beginning at the outfall and upstream of manhole 110601.
  - Manhole 110601 had a strong sewage odor and the water was heavily stained with orange and contained some solids.
  - This will help determine if exfiltration is coming from the sewer system into manhole 110601.
  - Manhole 110601 could not be tested for enterococci as the lab considered the results unreadable due to the color and solids in the sample.

We consider the recommendations for outfall #1106 to be of highest priority and outfall #212 to be the lowest priority.

## 6. CONCLUSION

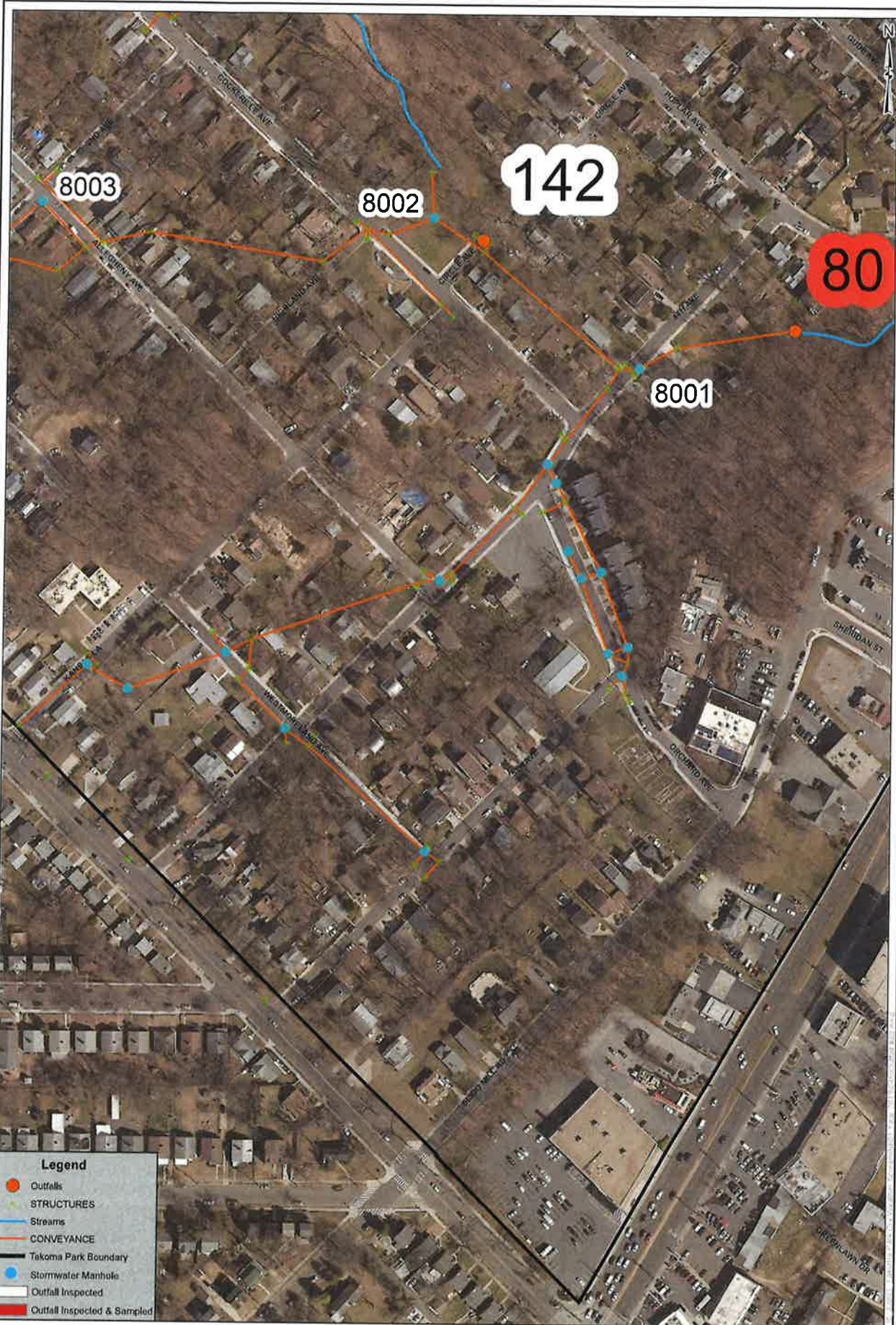
The Sligo Creek Watershed has been significantly influenced by commercial and residential land uses, particularly relating to the stormwater system within Takoma Park. Water sampling results during the outfall screenings over the years continue to indicate possible sanitary wastewater contamination or septic migration into storm drain system. Chloride exceeded EPA standards at outfall #1106 as well as at manhole 110601. Color exceeded the standards at manhole 110601 and was near the EPA standard at outfall #1106. E. coli and enterococci levels were low in the outfall #212 system with the exception for manhole 21202. The system for outfall #80 displayed high levels of both E. coli and enterococci. Levels of chlorine at manhole 8003 exceeded both chronic and acute EPA standards.

Tracking and locating the illicit discharges will reduce toxic pollutants which are threatening to aquatic life and human health. Outfall screening and evaluation will continue for 2020 and will follow the same methodologies used in 2019. These results will be used in conjunction with the illicit discharge tracking results.









- Legend**
- Outfalls
  - STRUCTURES
  - Streams
  - CONVEYANCE
  - Takoma Park Boundary
  - Stormwater Manhole
  - Outfall Inspected
  - Outfall Inspected & Sampled

150 75 0 150  
 Feet  
 1" = 150 Feet

*BayLand*  
**Consultants & Designers, Inc.**  
*"Integrating Engineering and Environment"*  
 7455 New Ridge Road, Suite T Phone: (410) 694-9401  
 Hanover, Maryland 21076 Fax: (410) 694-9405  
 Website: www.baylandinc.com

**Takoma Park  
 Outfall #80**





- Legend**
- Outfalls
  - STRUCTURES
  - Streams
  - CONVEYANCE
  - Takoma Park Boundary
  - Stormwater Manhole
  - Outfall Inspected
  - Outfall Inspected & Sampled

150 75 0 150  
 Feet  
 1" = 150 Feet

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**Takoma Park  
 Outfall #212**