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Karen Henry
Acting Director

December 22, 2022

Mr. Stewart Comstock, P.E.
Program Review Division Chief
Stormwater, Dam Safety, and Flood Management Program
Water and Science Administration
Maryland Dept. of the Environment
1800 Washington Blvd.
Baltimore, MD 21230

Subject: Anne Arundel County NPDES MS4 Permit # MD0068306 (20-DP-3316)
Fiscal Year 2022 (FY22) Annual Report

Dear Mr. Comstock:

With this correspondence we are submitting Anne Arundel County's Fiscal Year 2022 NPDES MS4 Annual Report (Report). This Report provides compliance information pertinent to the subject NPDES MS4 Permit (Permit) and covers the time period of July 1, 2021 through June 30, 2022. This is the first annual compliance report for the above referenced Permit, issued Nov. 5, 2021. The County's Department of Public Works, Bureau of Watershed Protection and Restoration continues to coordinate Permit administration in collaboration with sister County agencies.

Pursuant to your Department's guidance, all compliance report information and data are submitted electronically; no hard copy documents are provided. In addition to the narrative Report, data and supporting information are submitted in the required MS4 Geodatabase format (Appendix A to the Report). Appendix A also includes stand-alone geodatabases specific to the County stormwater infrastructure and to identification of commercial and industrial outfalls as required by Part IV.C of the Permit. Additionally, we call your attention to the ReadMe document included in this submittal for information and explanation relative to the completed FY22 MS4 Geodatabase fields. The County's

comments on the November 2021 Draft Supplement to the Geodatabase Design and User's Guide (Version 1.2 Draft Updates) are also provided with this Report submission.

Specific compliance narrative reports and other supporting data (e.g., Illicit Discharge Detection and Elimination – FY2022 Annual Report; 2022 Financial Assurance Plan (FAP), Year 2 BMP Portfolio) are submitted in electronic format as Report appendices and are included in the *NarrativeFiles* table of the MS4 Geodatabase.

Demonstration of sufficient funding to comply with Permit conditions is documented in the required FY22 WPRP Annual Financial Report (*NarrativeFiles*, Appendix G of the Report). Additional financial information is reported in the *FiscalAnalyses* table of the MS4 Geodatabase. The County's 2022 FAP and County Resolution 37-22, approving the FAP, are also found in the *NarrativeFiles* and in Appendix G.

Stormwater BMP data collection from newly completed grading permits continues with data from as-built plans entered into a database structure and geospatial framework designed to manage the County's inventory. With the advent of the November 2021 MS4 Geodatabase schema, the data previously associated with the *BMPPOI* feature class, *BMP* table and *RestBMP* feature class are condensed into a single feature class. The County continues to align our BMP data with this new format as we concurrently transition BMPs and their associated inspection records into a single central repository. In this year's MS4 Geodatabase the County will maintain these data as three separate datasets. Thus, we have not fully conformed to the new schema with this submittal. We anticipate fully implementing the November 2021 schema with the FY23 Annual Report submittal.

Stormwater management construction inspection and preventative maintenance inspections continued in FY22. We are pleased to report that 6,618 triennial maintenance inspections were conducted and are included in the *BMPInspections* table of the MS4 Geodatabase. This is 1,305 more inspections than were conducted in FY21. These triennial maintenance inspections are in addition to the reported inspections for alternative BMPs and restoration BMPs. Additionally, this Report speaks to MDE's FY21 Annual Report comment regarding the County's need for a stormwater management facility inspection rate increase.

The County's Erosion and Sediment Control Program continues to maintain delegation of enforcement authority through June 2023. Further, the County SCD and our Department of Inspections & Permits staff continue collaboration to improve the program and to address concerns documented in the April 2021 delegation of authority correspondence. We refer you to Appendix B and the *NarrativeFiles* for review of the Anne Arundel SCD Board of Supervisors Resolution 2021-1 that speaks to updated procedures.

As required by the Permit, we continue implementation of an IDDE Program in FY22. With this Report, we submit the Outfall Screening Prioritization Process (FY22-FY26) and the County's IDDE Standard Operating Procedures as required by the Permit (Appendix C, *NarrativeFiles*). We appreciate MDE's timely review of these documents.

The Outfall Screening Prioritization Process (FY22-FY26) identifies the different geographic areas of the County that will be assessed each year, with the entire County evaluated by the end of the permit term. During FY22, the northwest portion of the County was the targeted screening area for outfalls and commercial/industrial watershed review. The IDDE program successfully inspected 150 major and minor outfalls, including outfalls located on four County-owned properties within the targeted screening area and visually screened 250 commercial and industrial areas for evidence of upland pollutant sources. Complete documentation of IDDE activities and follow-up enforcement actions are found in Appendix C and in the *IDDE* and *NarrativeFiles* tables of the MS4 Geodatabase.

Information on the application of de-icing materials in FY22, and implementation of our Bureau of Highway's Salt Management Plan, are found in Part IV.D.4.c of the Report and in the *ChemicalApplication* table of the MS4 Geodatabase. The winter of 2021-2022 saw total snow accumulation of 13.3 inches at BWI airport, this is the third most snow recorded in the past five reporting periods, and coincided with the application of 11,253.75 total tons of salt (road salt and liquid salt brine) to County roadways. While this was an increase in quantity of salt used, the application of the County's Salt Management Plan and Sensible Salting Practices continue to result in efficient use of de-icing materials to ensure County roadway safety.

County facilities having coverage under the Stormwater Industrial General Permit 12-SW or 12-SR report maintenance of that coverage and completed the required SWPPP training during FY22. These activities are reported in the *PropertyManagement* table of the MS4 Geodatabase. These same facilities are working toward completing NOIs and updating SWPPPs for coverage under the newly issued 20-SW. In addition to those County properties subject to this Industrial General Permit, the County is currently working toward development of Good Housekeeping Plans and pollution prevention training for other County facilities as per the Permit requirements.

We continue supporting a robust and comprehensive public education and outreach program through online and social media platforms. The County public education programs focus on multiple aspects of stormwater pollution reduction and prevention. Additionally, we continue to maintain the Environmental Hotline for 24/7 reporting of environmental complaints. The Hotline, staffed by the Department of Inspections & Permits, is but one of three primary means of reporting environmental concerns to the County; the other two include the mobile app SeeClickFix[®] and dialing 311 to reach a County constituent services representative. During FY22, the County documented 511 building and 601 environmental complaints in our Code Compliance Database. Please see Part IV.D.5 of the Report for additional information.

Our stormwater restoration alternative control practices are continued at an equivalent level of implementation as in the previous MS4 Permit. In FY22, the County performed 6,654 lane miles of street sweeping (256 miles every two weeks) that resulted in collection of 172.86 tons of material. Additionally, the manual and mechanical storm drain inlet cleaning successfully removed 139.7 tons of debris while septage pumping greatly exceeded the required implementation level with over 20 million gallons of septage (equivalent to 20,747 units) pumped during this reporting period.

Our progress toward achieving the impervious acre restoration requirement (2,998 acres) of this Permit is documented in Part IV.E.2 of the Report. At the end of FY22, we completed all but two projects listed in the Year 1 BMP Portfolio, which were replaced by other projects from the County's project pipeline. A project by project accounting of Year 1 BMP Portfolio is included in this Report; additionally, planned restoration activities for FY23 are found in the Year 2 BMP Portfolio (Appendix D). In summary, the County exceeded the Year 1 20% restoration benchmark set forth in our Permit. Moreover, our cumulative progress of 1,535 equivalent impervious acres of restoration puts us at 51% achievement of the overall permit goal.

With this report, we are submitting the FY22 Countywide TMDL Stormwater Implementation Plan (Appendix E, *NarrativeFiles*). This document provides annual implementation progress for all County TMDLs as required by the Permit. Appended to the Countywide TMDL Plan for MDE review and comment are the Final Draft West River Sediment TMDL Restoration Plan and the Draft Baltimore Harbor Sediment TMDL Restoration Plan. Also appended to this Countywide TMDL Plan is the final revised Non-Tidal South River Watershed Sediment TMDL Stormwater Wasteload Allocation Attainment Report for MDE's concurrence. Finally, the County provides a response to the FY21 Countywide TMDL Plan submittal comments, received from MDE on September 12, 2022.

As documented in the FY21 MS4 Annual Report, the County joined the Pooled Monitoring Program (PMP), coordinated through the Chesapeake Bay Trust (CBT) in January 2021. Documentation of participation, including MOUs between the County and CBT, were previously provided to MDE.

Per current Permit requirements, the County notified MDE on March 1, 2022 of our intent to continue participation in the PMP in lieu of Assessment of Controls monitoring. County participation in the PMP for Assessment of Controls BMP Effectiveness Monitoring will continue for the duration of the permit term. However, County participation in the PMP for Assessment of Controls Watershed Assessment Monitoring is modified such that the County will implement the permit-required biological and habitat monitoring and continue PMP participation in lieu of the required bacteria and chloride monitoring. The Watershed Assessment Monitoring MOU between the County and CBT was amended to reflect this change. The amended MOU and other supporting documentation for PMP participation were previously submitted to MDE and are also found in Appendix F and the *NarrativeFiles*. Finally, as required by Part IV.G.2.b of the Permit, we submit our Comprehensive Plan for Watershed Assessment Monitoring: Biological and Habitat Monitoring (November 2022) for MDE's review and concurrence (Appendix F, *NarrativeFiles*).

Mr. Stewart Comstock
December 22, 2022
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We thank you for your consideration of this FY22 NPDES MS4 Annual Report. Should you have any questions regarding the submittal content please contact Janis Markusic at 410.222.0551 or via email at pwmark02@aacounty.org.

Sincerely,



Erik Michelsen,
Deputy Director
Bureau of Watershed Protection and Restoration

EM:JM

cc: Karen Henry, Acting Director, DPW
Ginger Ellis, Planning Administrator, BWPR
Brenda Morgan, Engineer Administrator, BWPR
Janis Markusic, Program Manager, BWPR
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Anne Arundel County NPDES MS4 Permit #MD0068306 (20-DP-3316)

Fiscal Year 2022 NPDES MS4 Annual Report

Correction to Transmittal Letter dated 22 December 2022

Replace the paragraph at the top of page 4 with the following paragraph:

Our progress toward achieving the impervious acre restoration requirement (2,998 acres) of this Permit is documented in Part IV.E.2. of the Report. At the end of FY22, Anne Arundel County completed all of the projects listed in the Year 1 BMP Portfolio. A project by project accounting of the Year 1 BMP Portfolio is included in this Report; additionally, planned restoration activities for FY23 are found in the Year 2 BMP Portfolio (Appendix D). In summary, the County exceeded the Year 1 20% restoration benchmark set forth in our Permit. Moreover, our cumulative progress of 1,535 equivalent impervious acres of restoration puts us at 51% achievement of the overall permit goal.