



Bureau of Watershed Protection & Restoration

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December 31, 2024

Ms. Gillian Adkins

Natural Resources Planner

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 2024 (FY24) Annual Report

Dear Ms. Adkins:

With this correspondence we are submitting Anne Arundel County's Fiscal Year 2024 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, 2023 through June 30, 2024. This is the third 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.

As with previous report submissions, all compliance information and data are submitted electronically. In addition to the narrative report, data and supporting information are provided in the required MS4 Geodatabase Version 1.2 format (Appendix A to the Report). Appendix A also includes stand-alone geodatabases specific to the County stormwater infrastructure and identification of commercial and industrial outfalls as required by Part IV.C., and a stand-alone Excel workbook of biological and habitat data collected in FY24 as required by Part IV. G.2.b.

Specific compliance narrative reports and other supporting data (e.g., IDDE – FY24 Annual Report; Countywide TMDL Stormwater Implementation, Year 4 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 FY24 WPRP Annual (Financial) Report (Appendix I, *NarrativeFiles*). Additional financial information is found in the *FiscalAnalyses* table of the MS4 Geodatabase. Additionally, the FY24 Financial Assurance Plan (FAP) was approved by Anne Arundel County Council via Resolution No. 39-24 on November 4,



2024. The complete FY24 FAP and Resolution No. 39-24 are submitted with this Annual Report (Appendix I and *NarrativeFiles*).

Information pertaining to the County's stormwater management facilities is found in the MS4 Geodatabase. Stormwater BMP data collection continues, with data from as-built plans entered into a database structure and geospatial framework designed to manage the County's inventory.

Stormwater management construction inspection and preventative maintenance inspections continued in FY24. We are pleased to report that 7,774 triennial maintenance inspections were conducted and are included in the *BMPInspections* table of the MS4 Geodatabase. These triennial maintenance inspections are in addition to the reported inspections for alternative BMPs and restoration BMPs. County agencies continue to work toward an annual inspection rate as discussed in Part IV.D.1.d of the Report.

The County's Erosion and Sediment Control Program continues to maintain delegation of enforcement authority through June 2025. The County implemented steps to address issues identified during the FY23 delegation review, as documented in Part IV.D.2. of the Report. In September 2024 (FY25), an application for continued delegation of authority was prepared and submitted by the County.

As required by the Permit, we continue implementation of an IDDE Program in FY24. The County's Outfall Screening Prioritization Process (FY22-FY26) and IDDE Standard Operating Procedures (SOP) were previously submitted and approved by MDE. During FY24, 172 outfalls (major and minor) were assessed and 332 commercial and industrial areas were evaluated for evidence of upland pollutant sources. Complete documentation of IDDE activities, and any required follow-up enforcement actions, are found in Appendix C and the *IDDEScreening* and *NarrativeFiles* tables of the MS4 Geodatabase.

During this reporting year, all Anne Arundel County-owned facilities holding a Stormwater General Permit (20-SW) provided MDE with a new NOI and updated SWPPPs as required. Relevant information regarding the 20-SW Permit compliance can be found in the *MunicipalFacilities* feature class and Part IV.D. 4 of the Report. Additionally, through a joint effort with six other MS4 Phase I jurisdictions, the required Good Housekeeping Plan (GHP) development moved forward. The GHP template documents were completed in March 2024 and the County then initiated property assessment for GHP need. As of November 2024, 149 properties were assessed and 10 properties require a GHP. The draft GHPs for those 10 properties can be found in Appendix D of the Report and in the *NarrativeFiles*. The County respectfully requests MDEs review and concurrence for these GHPs. Please refer to Part IV.D.4.b of the Report for additional information.

Information on application of de-icing materials during FY24 is found in Part IV.D.4.c of the Report and in the *ChemicalApplication* table of the M4 Geodatabase. As required, the County's Salt Management Plan is submitted with this Report in Appendix E and in the *NarrativeFiles*. Continued application of the County's Salt Management Plan and Sensible Salting Practices result in the efficient use of de-icing materials to ensure roadway safety.

The County continues supporting a robust and comprehensive environmental and stormwater outreach and education program through both online and social media platforms, as well as participation in restoration project-specific public meetings. Please see Part IV.D.5 of the Report for a comprehensive summary of our program. The County continues maintaining the Environmental Hotline for 24/7



reporting of environmental complaints. The Hotline, staffed by the Department of Inspections & Permits, is but one of several primary means of reporting environmental concerns to the County. The County webpage also provides a link to submit on-line requests for investigation of environmental concerns or any other observation or issue of concern, residents may also use the mobile app SeeClickFix© or dial 311 to reach a County constituent services representative.

Stormwater restoration alternative control practices are continued at equivalent levels of implementation as in the previous MS4 Permit. In FY24, the County performed 6,658 lane miles of street sweeping (256 miles every two weeks), resulting in collection of 233 tons of material. Manual and mechanical storm drain inlet cleaning successfully removed 300 tons of debris.

The County also continues to experience a high level of septage pumping, with 21.7 million gallons of septage (equivalent to 21,736 units) pumped during the reporting period.

Progress toward achieving the impervious acre restoration requirement (2,998 acres) of this Permit is documented in Part IV.E.2 of the Report. Overall, the County far exceeded the Year 3 restoration benchmark of 60%, completing 2,232 acres of equivalent impervious restoration by the end of the reporting period. This is roughly 60% of the allocated restoration goal. Although we did not complete all of the restoration projects identified in the Year 3 BMP Portfolio, a number of “replacement” projects were constructed this year. A project-by-project accounting of the Year 3 BMP Portfolio, and the planned Year 4 BMP Portfolio, are found in Appendix D and the *NarrativeFiles*.

The County’s TMDL implementation update is fully described in the FY24 Countywide TMDL Stormwater Implementation Plan (Appendix G, *NarrativeFiles*). This document provides annual implementation progress for all County TMDLS as required by the Permit. Additionally, FY24 progress is reported in the *LocalTMDLProgress* and *ChesapeakeBayProgress* tables of the MS4 Geodatabase. No new TMDLs were issued to the County in FY24; however, following MDEs August 2022 guidance for developing local PCB TMDL watershed implementation plans, the County developed the draft PCB TMDL Implementation Plan for the Patuxent Watershed along with the Sampling and Analysis Plan. Both of these documents are submitted as appendices to the Countywide TMDL Stormwater Implementation Plan (Appendix G, *NarrativeFiles*). The County requests MDE review and approval of the draft Patuxent Watershed PCB TMDL Implementation Plan. Concurrent with MDE review, the County will advertise this draft Implementation Plan for a 30-day public comment period in December 2024.

In January 2024, the County received MDE review comments on the Draft Baltimore Harbor Sediment TMDL Implementation Plan. Those review comments are being addressed in the update to that Implementation Plan that is currently under contract. Additionally, MDEs approval of the West River Sediment TMDL Implementation Plan included a set of recommendations that are being considered in the update to that TMDL Implementation Plan. Those updated Implementation Plans will be submitted to MDE for review and approval before the end of the permit term.

With respect to Assessment of Controls (Part IV.G) compliance, the County continues participation in the Pooled Monitoring Program (PMP) as coordinated through the Chesapeake Bay Trust (CBT) in lieu of all required BMP Effectiveness and Watershed Assessment Monitoring except Biological and Habitat monitoring (Part IV.G.2.b.i). Documentation of County funding for the PMP is found in Appendix H.



The FY24 biological and habitat data collected in support of this permit requirement is submitted as a stand-alone Excel Workbook in Appendix A. The Excel file structure follows the template and data guide provided by MDE in June 2024.

Assessment of Controls includes PCB Source Tracking requirements, which the County is pursuing in coordination with University of Maryland Baltimore County (UMBC) in the Baltimore Harbor and Curtis Creek/Bay PCB TMDL watershed. Results of this monitoring work are appended to the Countywide TMDL Stormwater Implementation Plan (Appendix G). PCB source tracking in the Patuxent River watershed will be initiated following receipt of MDE concurrence on the associated TMDL Implementation Plan and the Sampling and Analysis Plan (Appendix G, *NarrativeFiles*).

We thank you for your consideration of the FY24 NPDES MS4 Annual Report and Appendices. Should you have any questions regarding the submittal content please contact me at 410-222-7520 or via email at pwmich20@aacounty.org.

Sincerely,



Erik Michelsen
Senior Environmental Policy Officer
Deputy Director
Bureau of Watershed Protection and Restoration
Department of Public Works

EM:JM

cc: Karen Henry, Director, DPW
Brenda Morgan, Engineer Manager, BWPR
Douglas Griffith, Environmental Planner, BWPR

