



RHODE ISLAND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
Office of Water Resources

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## RIPDES SMALL MS4 ANNUAL REPORT GENERAL INFORMATION PAGE

RIPDES PERMIT #RIR040005

REPORTING PERIOD:       **YEAR 17**  
Jan 2020-Dec 2020

### OPERATOR OF MS4

Name: City of Providence			
Mailing Address: 25 Dorrance Street			
City: Providence	State: RI	Zip: 02903	Phone: (401) 680-5000
Contact Person: Craig J. Hochman, P.E.		Title: Deputy Chief Engineer	
		Email: chochman@providenceri.gov	
Legal status (circle one):			
PRI - Private	<b>PUB - Public</b>	BPP - Public/Private	STA - State      FED - Federal
Other (please specify):			

### OWNER OF MS4 (if different from OPERATOR)

Name:			
Mailing Address:			
City:	State:	Zip:	Phone: (   )
Contact Person:		Title:	
		Email:	

### CERTIFICATION

I certify under penalty of law that this document and all attachments were prepared under the 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, I certify that 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.

Print Name    Leo J. Penatta

Print Title    Director of Public Works

Signature     

Date    3-9-21





**MINIMUM CONTROL MEASURE #1:  
PUBLIC EDUCATION AND OUTREACH (Part IV.B.1 General Permit)**

**SECTION I. OVERALL EVALUATION:**

**GENERAL SUMMARY, STATUS, APPROPRIATENESS AND EFFECTIVENESS OF MEASURABLE GOALS:**

Include information relevant to the implementation of each measurable goal, such as activities, topics addressed, audiences and pollutants targeted. Discuss activities to be carried out during the next reporting cycle. If addressing TMDL requirements, please indicate rationale for choosing the education activity to address the pollutant of concern.

**(Note: Identify parties responsible for achieving the measurable goals and reference any reliance on another entity for achieving measurable goals. Mark with an asterisk (\*) if this person/entity is different from last year.)**

**Responsible Party Contact Name & Title:** William C. Bombard, P.E., City Engineer

**Phone:** 401.680.7535

**Email:** wbombard@providenceri.gov

IV.B.1.b.1	Use the space below to provide a General Summary of activities implemented to educate your community on how to reduce stormwater pollution. For TMDL affected areas, with stormwater associated pollutants of concern, indicate rationale for choosing the education activity. List materials used for public education and topics addressed. Summarize implementation status and discuss if the activity is appropriate and effective.
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The City has not implemented formal activities to educate the community on how to reduce stormwater pollution regardless of TMDL status. The Department of Public Works, Parks Department and the Office of Sustainability share responsibility for implementing the public education and outreach measure. The COVID pandemic has slowed down the City's community collaborations in the reporting year but many independent events/activities, which incorporate stormwater education, still occurred, including the following:

- The Sustainability Department maintains a "Stormwater Management" page on the City's website to inform residents on what the City is doing to improve water quality and what they can be doing themselves at home. <https://www.providenceri.gov/sustainability/stormwater-management/>. They also maintain multiple social media pages, including a Sustain PVD Facebook page which advertises the events the Department hosted throughout the year.
- The City is working with community partners, such as the Green Infrastructure Coalition, to educate residents on reducing stormwater pollution, including implementing demonstration projects in the neighborhoods and at public events.
- The City is working with local non-profit organizations, such as Groundwork Rhode Island, to install public right-of-way bioswales in the sidewalk in front of a participating resident's property. Before installation, the property owner is informed of the importance and functionality of a natural drainage system.
- Roger Williams Park continues to add informational signs regarding stormwater green infrastructure and the impact of feeding the waterfowl near around the park, some of which are even permeable.
- The Parks Departments has recently built the Stormwater Innovation Center which allows the public to come and learn about the benefits of green infrastructure. They also maintain a Facebook page for the center which advertises the dozens of events they hold throughout the year. The Parks Department and the Stormwater Innovation Center held their inaugural "Rain Harvest Arts Festival", celebrating the City's investment in green infrastructure and highlighting the cleaned stormwater runoff.
- The Planning Department, in conjunction with the Department of Public Works, has been working with Crossman Engineering on a Sample Environmental Project (SEP) to restore the Seekonk River bank along River Road and address shoulder erosion along Irving Avenue with a strong emphasis on green infrastructure. Multiple public meetings and stakeholder collaborations have been a part of this project.
- The Sustainability Department, in conjunction with the Woonasquatucket River Watershed Council (WRWC), hosted the annual SustainPVD event. Due to the COVID pandemic, the event had to be held online but the results were still positive. According to WRWC records, 25 people attended the virtual workshop and 46 rain barrels were distributed, 7 of which are from Providence.

IV.B.1.b.2	Use the space below to provide a general summary of how the public education program was used to educate the community on how to become involved in the municipal or statewide stormwater program. Describe partnerships with governmental and non-governmental agencies used to involve your community.
<p>There has been no formal public education program in the reporting year.</p> <p>The City's Forestry Division of the Parks Department is a partner in the Providence Neighborhood Planting Program (PNPP), which plants approximately 500 trees every year with the help of neighborhood residents. The Parks Department has also planted trees throughout the parks across the City. In the reporting year, 580 trees were planted.</p> <p>The City works with neighborhood groups and environmental group to supply tools and collect trash during neighborhood cleanup events.</p> <p>The City works closely with the Woonasquatucket River Watershed Council (WRWC) in their efforts to implement green infrastructure, educate residents, and clean up the river. For example, with the support of the City, the WRWC installed several StormTrees along Pleasant Valley Parkway and Manton Avenue to increase the water quality before discharging into the Woonasquatucket River. Many public meetings were held in preparation on the project and informative signage is included as part of the project.</p> <p>The Parks Departments has recently brought the Stormwater Innovation Center online which allows the public to come and learn about the benefits of green infrastructure. They also maintain a Facebook page for the center which advertises the dozens of events they hold throughout the year. Additionally, the Stormwater Innovation Center hosts and presents training events to share knowledge related to stormwater/green infrastructure design, construction, and maintenance. The Parks Department and the Stormwater Innovation Center held their inaugural "Rain Harvest Arts Festival", celebrating the City's investment in green infrastructure and highlighting the cleaned stormwater runoff</p> <p>In the reporting year, the City worked with Groundwork Rhode Island to redesign and install sidewalk right-of-way bioswales. Groundwork Rhode Island collaborated with many homeowners to get their approval before installing the bioswale in front of their property. Ten homeowners were interested and a bioswale was installed.</p> <p>Significant public works capital projects (RIDOT, City Planning Department) have incorporated stormwater features in design plans. Informative signs are proposed to accompany the stormwater features indicating their purpose and general information on stormwater.</p>	

**PUBLIC EDUCATION AND OUTREACH cont'd**

Check all topics that were included in the Public Education and Outreach program during this reporting period. For each of the topics selected, provide:

Target Audience(s): Public Employees, Residents, General Public, Businesses, Industries, Restaurants, Contractors, Developers, Agriculture, Other (describe);

Target Pollutant(s): (e.g. pet waste, fertilizers, Total Suspended Solids, etc.);

Strategies/Media: Direct Mailings, List Servs, Kiosks or Other Displays, Newspaper Ads or Articles, Public Events or Presentations, School Programs, Printed Materials, Direct Trainings, Videos, Webpage, Other (describe)

Topic	Target Audience(s)	Target Pollutant(s)	Strategies/Media
<input checked="" type="checkbox"/> Construction Sites	Contractors	TSS	Direct Engagement
<input checked="" type="checkbox"/> Pesticide and Fertilizer Application	Residents, businesses, neighborhood groups	Pesticides	Website <a href="https://www.providenceri.gov/sustainability/pesticidefree/">https://www.providenceri.gov/sustainability/pesticidefree/</a>
<input checked="" type="checkbox"/> General Stormwater Management Info	Residents, General Public	Pet Waste, TSS	Public Events, Social Media, Webpage
<input checked="" type="checkbox"/> Pet Waste Management	Residents	Pet Waste/Bacteria	Informative Signage
<input checked="" type="checkbox"/> Household Hazardous Waste Disposal	Residents	Hazardous Waste	Eco-Depot
<input checked="" type="checkbox"/> Recycling	Residents, Businesses	Non-Recyclable Waste	Rejecting contaminated recycling bins at the curb
<input type="checkbox"/> Illicit Discharge Detection and Elimination			
<input checked="" type="checkbox"/> Riparian Corridor Protection/Restoration	Project Stakeholders	TSS	Plan revisions based on received feedback
<input type="checkbox"/> Infrastructure Maintenance			
<input checked="" type="checkbox"/> Trash Management	Businesses/Waste Haulers	Dumpster Waste	Hauler License and dumpster minimum standards
<input checked="" type="checkbox"/> Smart Growth	Residents, General Public	Carbon Dioxide	Bike lanes
<input type="checkbox"/> Vehicle Washing			
<input type="checkbox"/> Storm Drain Marking			
<input checked="" type="checkbox"/> Water Conservation	Residents/Attendees	TSS	Sustain PVD rain barrels
<input checked="" type="checkbox"/> Green Infrastructure/Better Site Design/LID	Residents	TSS	Right-of-way bioswales
<input type="checkbox"/> Wetland Protection			
<input type="checkbox"/> Other:			
<input type="checkbox"/> None			

**Additional Measurable Goals and Activities**

Please list all stormwater training attended by your staff during the 2020 calendar year and list the name(s) and municipal position of all staff who attended the training.

**Trainings:**

4-30-2020 (StormwaterONE) "Non-Structural BMPs"

Attendees: William Bombard, P.E., City Engineer

5-5-2020 (SNEP Network) "Got LID? A municipal Self-Assessment Tool for Rhode Island Communities"

Attendees: Craig Hochman, P.E., Deputy Chief Engineer

5-7-2020 (LTAP) "Roadway Drainage Webinar Part Two"

Attendees: Craig Hochman, P.E., Deputy Chief Engineer

6-26-2020 (SNEP Network) "Green Stormwater Infrastructure 101 for New England Communities"

Attendees: Craig Hochman, P.E., Deputy Chief Engineer; Brian Byrnes, Parks Deputy Superintendent; Justin Mateus, Civil Engineer

7-31-2020 (SNEP Network) "Designing Green Stormwater Infrastructure"

Attendees: Craig Hochman, P.E., Deputy Chief Engineer; Justin Mateus, Civil Engineer

10-23-2020 (SNEP Network) "Green Stormwater Project Construction Oversight Training"

Attendees: Craig Hochman, P.E., Deputy Chief Engineer



## MINIMUM CONTROL MEASURE #2: PUBLIC INVOLVEMENT/PARTICIPATION (Part IV.B.2 General Permit)

### SECTION I. OVERALL EVALUATION:

#### GENERAL SUMMARY, STATUS, APPROPRIATENESS AND EFFECTIVENESS OF MEASURABLE GOALS:

Include information relevant to the implementation of each measurable goal, such as types of activities and audiences/groups engaged. Discuss activities to be carried out during the next reporting cycle. If addressing TMDL requirements, please indicate rationale for the activities chosen to address the pollutant of concern.

**(Note: Identify parties responsible for achieving the measurable goals and reference any reliance on another entity for achieving measurable goals. Mark with an asterisk (\*) if this person/entity is different from last year.)**

**Responsible Party Contact Name & Title:** William C. Bombard, P.E., City Engineer

**Phone:** 401.680.7535

**Email:** wbombard@providenceri.gov

IV.B.2.b.2.ii	Use the space below to describe audiences targeted for the public involvement minimum measure, include a description of the groups engaged, and activities implemented and if a particular pollutant(s) was targeted. If addressing TMDL requirements indicate how the audience(s) and/or activity address the pollutant(s) of concern. Name of person(s) and/or parties responsible for implementation of activities identified. Assess the effectiveness of BMP and measurable goal.
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The City has not implemented formal activities to educate the community on how to reduce stormwater pollution regardless of TMDL status. The Department of Public Works, Parks Department and the Office of Sustainability share responsibility for implementing the public involvement and participation measure. The COVID pandemic has slowed down the City's community collaborations in the reporting year but many independent events/activities still occurred, including the following:

- The City of Providence participates in the RI Green Infrastructure Coalition, which engages more than 40 not-for-profit organizations with city officials to promote and construct pathways for rainwater, melting snow and other runoff, resulting in a cityscape to be attractive to business, tourism, and residents while improving the water quality in nearby waterbodies. More information can be found at the following website: <http://www.greeninfrastructureri.org/>
- The City works with neighborhoods and environmental groups to provide trash bags and remove trash during neighborhood cleanup events, such as on Earth Day weekend.
- The Providence Parks Department, Forestry Division has planted 580 trees in the reporting year. A majority of street trees are planted by neighborhood groups and volunteers. Planting of street trees has resulted in an estimated 6,960 sf of impervious sidewalk removal. <https://www.providenceri.com/parks-and-rec/forestry/street-tree-planting>
- The Parks Department and Sustainability Department held numerous online events throughout the reporting year that were advertised through their social media pages and the City's website. With the COVID pandemic, in-person events were less prevalent this year but still occurred, primarily with the Parks Department and their Stormwater Innovation Center with an added emphasis on socially distant learning. More information about the Providence Stormwater Innovation Center can be found at the following website: <https://www.stormwaterinnovation.org/>. Additionally, the Stormwater Innovation Center hosts and presents training events to share knowledge related to stormwater/green infrastructure design, construction, and maintenance. The Parks Department and the Stormwater Innovation Center held their inaugural "Rain Harvest Arts Festival", celebrating the City's investment in green infrastructure and highlighting the cleaned stormwater runoff.
- The City worked with Groundwork Rhode Island to redesign and install sidewalk right-of-way bioswales. Groundwork Rhode Island collaborated with many homeowners to get their approval before installing the bioswale in front of their property. Ten homeowners were interested and a bioswale was installed.
- The Sustainability Department, in conjunction with the Woonasquatucket River Watershed Council (WRWC), hosting the annual SustainPVD event. Due to the COVID pandemic, the event had to be held online but the results were still positive. According to WRWC records, 25 people attended the virtual workshop and 46 rain barrels were distributed, 7 of which are from Providence.

Opportunities provided for public participation in implementation, development, evaluation, and improvement of the Stormwater Management Program Plan (SWMPP) during this reporting period. Check all that apply:

- |  |  |
|--|--|
| <input checked="" type="checkbox"/> Cleanup Events             | <input type="checkbox"/> Storm Drain Markings            |
| <input checked="" type="checkbox"/> Comments on SWMPP Received | <input checked="" type="checkbox"/> Stakeholder Meetings |
| <input type="checkbox"/> Community Hotlines                    | <input checked="" type="checkbox"/> Volunteer Monitoring |
| <input checked="" type="checkbox"/> Community Meetings         | <input checked="" type="checkbox"/> Plantings            |
| <input type="checkbox"/> Other (describe)                      |  |

Additional Measurable Goals and Activities

**SECTION II. Public Notice Information (Parts IV.G.2.h and IV.G.2.i) \*Note: attach copy of public notice**

Was the availability of this Annual Report and the Stormwater Management Program Plan (SWMPP) announced via public notice? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	If YES, Date of Public Notice: SWMPP – March 2, 2021 2020 RIPDES Annual Report DRAFT – March 2, 2021
How was public notified: <input type="checkbox"/> List-Serve (Enter # of names in List: _____) <input type="checkbox"/> Newspaper Advertising <input type="checkbox"/> TV/Radio Notices <input type="checkbox"/> Town Hall posting <input checked="" type="checkbox"/> Website <input type="checkbox"/> Other:	
Enter Web Page URL: <a href="https://www.providenceri.gov/public-works/forms/">https://www.providenceri.gov/public-works/forms/</a>	
Was public meeting held? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
Date:	Where:
Summary of public comments received: No public comments received.	
Planned responses or changes to the program: Send social media updates about website uploads. Organize the DPW Engineer webpage to be more navigable and user friendly. Include links to other City department webpages regarding stormwater, pollution and conservation.	



## MINIMUM CONTROL MEASURE #3: ILLICIT DISCHARGE DETECTION AND ELIMINATION (Part IV.B.3 General Permit)

### SECTION I. OVERALL EVALUATION:

#### GENERAL SUMMARY, STATUS, APPROPRIATENESS AND EFFECTIVENESS OF MEASURABLE GOALS

Include information relevant to the implementation of each measurable goal, such as activities implemented (when reporting tracked and eliminated illicit discharges, please explain the rationale for targeting the illicit discharge) to comply with on-going requirements, and illicit discharge public education activities, audiences and pollutants targeted. Discuss activities to be carried out during the next reporting cycle. If addressing TMDL requirements, please indicate rationale for the activities chosen to address the pollutant of concern.

**(Note: Identify parties responsible for achieving the measurable goals and reference any reliance on another entity for achieving measurable goals. Mark with an asterisk (\*) if this person/entity is different from last year.)**

**Responsible Party Contact Name & Title:** William C. Bombard, P.E., City Engineer

**Phone:** 401.680.7535

**Email:** wbombard@providenceri.gov

**Has this person received training on Illicit Discharge Detection and Elimination (IDDE)?** No

**If yes, when and where?** N/A

**If no, who is trained on IDDE?** Justin Mateus, DPW Civil Engineer, received NPDES Certified Stormwater Inspector training on February 16, 2018.

IV.B.3.b.1:	If the outfall map was not completed, use the space below to indicate reasons why, proposed schedule for completion of requirement and person(s)/ Department responsible for completion. (The Department recommends electronic submission of updated EXCEL Tables if this information has been amended.)
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**Number of Outfalls Mapped within regulated area:** 151

**Percent Complete:** 100%

**If 100% Complete, Provide Date of Completion:** December 2020

Over the past couple of years, the City has been working with their sewer/stormwater consultant, CDM Smith, to enhance the mapping of the sanitary, stormwater and combined sewer systems using GIS and include their associated catch basins, manholes, and outfalls. The outfalls were mapped using GPS and the manholes were mapping using aerial pictometry, which resulted in some connectivity issues. Throughout the reporting year, the manholes upstream of the non-connecting areas were GPS located to better represent the in-field connection on the GIS. The outfalls also include attributes such as pipe diameter and ownership. Furthermore, the MS4 Regulated area has been further refined based on the GIS mapping efforts.

IV.B.3.b.2	Indicate if your municipality chose to implement the tagging of outfalls activity under the IDDE minimum measure, activities and actions undertaken under the 2020 calendar year.
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The City did not implement the tagging of outfalls in the 2020 reporting year. All outfalls were GPS located/verified during the 2018 inspection and georeferenced on the GIS map.

IV.B.3.b.3	Use the space below to provide a summary of the implementation of recording of system additional elements (catch basins, manholes, and/or pipes). Indicate if the activity was implemented as a result of the tracing of illicit discharges, new MS4 construction projects, and inspection of catch basins required under the IDDE and Pollution Prevention and Good Housekeeping Minimum Measures, and/or as a result of TMDL related requirements and/or investigations. Assess effectiveness of the program minimizing water quality impacts.
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A project to digitize the sewer network was awarded in 2017. In 2018, the City worked with their sewer/stormwater consultant, CDM Smith, to create the Providence Sewer GIS Map, which digitized all the City's as-built sewer plans. The Sewer GIS displays the entirety of the sewer system (sanitary, storm, and combined lines) and each line includes attributes such as ownership, flow direction, pipe shape and diameter, and a direct link to the scanned as-built plan. In 2019, the Sewer GIS was enhanced to include manholes and catch basins. This activity was implemented as a result of needing to identify the City's regulated MS4 area. The Sewer GIS can be found on the DPW Engineering webpage or at the following link:

<https://cdmsmith.maps.arcgis.com/apps/webappviewer/index.html?id=bededb127dc94cf78501c5a2ab1e409e>

In the reporting year, 2020, the Sewer GIS was enhanced even further to include mainline CCTV inspections. In the City's effort to establish a sewer asset management system, approximately 11 miles of sewer pipe was CCTV inspected in the reporting year and all of the observed pipe defects have been reflected within the Sewer GIS. Including the CCTV observations and footage in the Sewer GIS allows for the most accurate understanding of pipe conditions. Asset management information is maintained in a separate, private webmap accessible only to City employees. The City has also GPS located many manholes in the reporting year to improve GIS accuracy and connectivity. The CCTV inspections focused mainly on the combined sewer system but some lines from the stormwater system were inspected too.



**ILLICIT DISCHARGE DETECTION AND ELIMINATION cont'd**

IV.B.3.b.4	<p>Indicate if the IDDE ordinance was <b>not</b> developed, adopted, and submitted to RIDEM, explain reasons why, submit proposed schedule for completion and identify person(s) / Department and/or parties responsible for the completion of this requirement.</p> <p><b>Date of Adoption:</b> 12/8/05 (Illicit Discharge Detection and Elimination – No. 569)          If the Ordinance was amended in 2020, please indicate why changes were necessary.</p>
<p>No amendments were made to the IDDE ordinance in the reporting year.</p>	
IV.B.3.b.5.ii, iii, iv, & v	<p>Use the space below to provide a summary of the implementation of procedures for receipt and consideration of complaints, tracing the source of an illicit discharge, removing the source of the illicit discharge and program evaluation and assessment as a result of removing sources of illicit discharges. Identify person(s) / Department and/or parties responsible for the implementation of this requirement.</p>
<p>The Department of Public Works, Engineering and Sewer Divisions are responsible for tracing an illicit discharge and the Engineering Division alone is responsible for removing the source of an illicit discharge.</p> <p>The City works with its sewer/stormwater consultant, CDM Smith, to identify outfalls with illicit discharge and trace the line upstream until the contaminant is no longer evident. Once the illicit connection is determined to be within a short range of manholes, closed circuit television (CCTV) is used to identify any connections not on the City's sewer record plans. Once the illicit connection is found, the Chief Engineer sends the responsible party a letter from the City explaining the problem and what they have to do to repair it. The Sewer Division then checks on the responsible party regularly to ensure the illicit connection is disconnected in a timely manner. If no action is taken by the responsible party within a timely manner, the City reserves the right to plug the illicit connection to discontinue any further contamination. This is all done in accordance with the IDDE Plan developed in 2018.</p> <p>In addition to working with the consultant, the City also utilizes a computer-based service request system where residents can report complaints of illicit discharge and sewer odor via phone call, email, or by downloading the City's application PVD311. The system is capable of generating work orders and will automatically email citizens upon fulfillment of a service request. Such requests are received by the Department of Public Works, Mayor's Center for City Services, and the City Council Office.</p> <p>Illicit discharges may also be reported directly to the Department of Public Works, Engineering Division for further investigation.</p> <p>In the reporting year, DPW was authorized to proceed with the procurement of a sewer CCTV camera to further assist in illicit discharge detection. At the time of this report submission, the sewer CCTV camera is in active procurement.</p>	
IV.B.3.b.5.vi	<p>Use the space below to provide summary of implementation of catch basin and manhole inspections for illicit connections and non-stormwater discharges. If the required measurable goal of inspecting all catch basins and manholes for this purpose was not accomplished, please indicate reasons why, the proposed schedule of completion and identify person(s) / Department and/or parties responsible for the implementation of this requirement. Evaluate effectiveness of the implementation of this requirement. The operator must keep records of all inspections and corrective actions required and completed.</p> <p><b>Number of Catch Basins and Manholes Inspected for illicit connections/IDDE:</b> 2,365 catch basins, citywide, including MS4 and combined systems.</p> <p><b>Percent Complete:</b> 16.5%</p> <p><b>Date of Completion:</b> December 31, 2020</p>
<p>The City has an informal program of inspection for catch basins. As the structures are cleaned, a very basic visual inspection is performed by the operator. If anything out of the ordinary is observed, it is sent to the DPW Engineering Division for further investigation and follow-up. In the reporting year, no illicit connections were found. This program is effective, as operators can identify evidence of illicit discharge (toilet paper, human waste, petroleum slicks, etc). DPW is currently in the process of procuring a sewer CCTV camera, which will come with IDDE training for the CCTV and clamshell truck operators.</p> <p>In the reporting year, the City has been working with their sewer/stormwater consultant, CDM Smith, to develop a mobile application to help clamshell/vacuum truck operators track data from catch basin inspections. It is hopeful that the mobile application will be used during catch basin inspection/cleaning in the second half of 2021.</p>	

**ILLICIT DISCHARGE DETECTION AND ELIMINATION cont'd**

<p>IV.B.3.b.5.vii</p>	<p>If dry weather surveys including field screening for non-stormwater flows and field tests of selected parameters and bacteria were not completed, indicate reasons why, proposed schedule for the completion of this measurable goal and person(s) / Department and/or parties for the completion of this requirement. Evaluate effectiveness of the implementation of this requirement. <b>The results of the dry weather survey investigations should be submitted to RIDEM electronically, if not already submitted or if revised since 2009, in the RIDEM-provided EXCEL Tables and should include visual observations for all outfalls during both the high and low water table timeframes, as well as sample results for those outfalls with flow. The EXCEL Tables must include a report of all outfalls and indicate the presence or absence of dry weather discharges.</b></p> <p><b>Number of Outfalls Surveyed Jan-Apr: 0      Number of Outfalls Surveyed Jul-Oct: 0</b>  <b>Percent Complete: N/A for 2020</b>  <b>Date of Completion: June 27, 2018</b></p>
<p>All 151 outfalls were inspected 2018, from July to October due to an excessively wet spring that year. Of all the outfalls inspected, 22 were determine to have illicit, non-stormwater flow and were added to the prioritization list for further investigation. Also, in 2018, the first four prioritized outfalls (Mash02, Mosh06, Woon02, and Woon44) were investigated upstream and narrowed down to a target area for CCTV. In the reporting year, 2020, another 3 High Intensity Target (HIT) outfalls (Mosh13, Seek01, and SD6) were investigated.</p> <p>The Department of Public Works, Engineering Division is responsible for dry weather outfall inspections.</p>	
<p>IV.B.3.b.7</p>	<p>Use the space below to provide a description of efforts and actions taken as a result of for coordinating with other physically interconnected MS4s, including State and federal owned or operated MS4s, when illicit discharges were detected or reported. Identify person(s) / Department and/or parties responsible for the implementation of this requirement. Evaluate effectiveness of the implementation of this requirement.</p>
<p>There has been one potential illicit discharge at Dixon Street, within the pipe connecting Mashapaug Pond to the Roger Williams Park Ponds. RIDOT and Providence Parks Department have been working to identify the source, and will continue in 2021 to isolate the discharge and follow-up for removal.. In the reporting year, the City investigated three additional outfalls with illicit discharge but the extent of the investigation stayed within the City's MS4 only.</p>	
<p>IV.B.3.b.8</p>	<p>Use the space below to provide a description of efforts and actions taken for the referral to RIDEM of non-stormwater discharges not authorized in accordance to Part I.B.3 of this permit or another appropriate RIPDES permit, which the operator has deemed appropriate to continue discharging to the MS4, for consideration of an appropriate permit. Identify person(s) / Department and/or parties responsible for the implementation of this requirement. Evaluate effectiveness of the implementation of this requirement.</p>
<p>In the reporting year, there was one non-stormwater discharge that was referred to RIDEM near King Street and Sheridan Street. The non-stormwater discharge was observed by NBC and referred to the City. After further investigation, the City identified a site plan showing the private drain from an old mill that was discharging non-stormwater directly into the Woonasquatucket River. Since the non-stormwater flow never entered the City's sewer system, the incident was referred to RIDEM for further action.</p> <p>Additionally, the City was made aware of a possible illicit connection in the Storm line connecting Mashapuag Pond to the Roger Williams Park Ponds near Dixon St. The connection was identified by RIDOT when CCTV inspecting the line and passed along to the City for further investigation. The City, with the assistance of RIDOT, is currently working on drafting letters to the surrounding property owners to identify whether or not they are illicit tied into the storm line.</p> <p>The Department of Public Works, Engineering Division is responsible for implementing this measure.</p>	
<p>IV.B.3.b.9</p>	<p>Use the space below to provide a description of efforts and actions taken to inform public employees, businesses, and the general public of hazards associated with illegal discharges and improper disposal of waste, as well as allowable non-stormwater discharges identified as significant contributors of pollutants. Include a description on how this activity was coordinated with the public education minimum measure and the pollution prevention/good housekeeping minimum measure programs. Identify person(s) / Department and/or parties responsible for the implementation of this requirement. Evaluate effectiveness of the implementation of this requirement.</p>
<p>No formal efforts have been taken to inform public employees, businesses and the general public of hazards associated with illegal discharges.</p>	
<p>Every year, the Department of Public Works hosts Eco-Depot, which allows residents to opportunity to properly dispose of hazardous household wastes. This event has been very effective. In previous years, Public Works has worked with different schools within the MS4 to mark storm drain with a sticker adhered to the inlet stone saying "Don't Dump, Drains to Bay"</p>	
<p>Additional Measurable Goals and Activities</p>	

**ILLICIT DISCHARGE DETECTION AND ELIMINATION cont'd**

**SECTION II.A Other Reporting Requirements - Illicit Discharge Investigation and System Mapping (Part IV.G.2.m)**

# of Illicit Discharges Identified in 2020: 5	# of Illicit Discharges Tracked in 2020: 9
# of Illicit Discharges Eliminated in 2020: 0	# of Complaints Received: 2
# of Complaints Investigated: 2	# of Violations Issued: 0
# of Violations Resolved: 0	# of Unresolved Violations Referred to RIDEM: 1
Total # of Illicit Discharges Identified to Date (since 2003): 11	Total # of Illicit Discharges remaining unresolved at the end of 2020: 8
<p>Summary of Enforcement Actions:</p> <p>The four outfall inspections from 2019 and the three outfall inspections from 2020 were further investigated in the reporting year but the source remains elusive. The illicit discharge discovered at King St and Sheridan St was handed over to RIDEM for enforcement and the Dixon St possible illicit connection is still under investigation. No formal enforcement actions were taken by the City in the reporting year.</p>	
<p>Extent to which the MS4 system has been mapped:</p> <p>The Providence MS4 system has been mapped to include main lines, manholes, catch basins, inlets, outfalls, flow direction, laterals, the regulated area, and CCTV inspections. The main lines include attributes such as ownership, type, shape, diameter, and a direct link to the as-built sewer plan.</p> <p>Total # of Outfalls Identified and Mapped to date: 151</p>	

**SECTION II.B Interconnections (Parts IV.G.2.k and IV.G.2.l)**

Interconnection:	Date Found:	Location:	Name of Connectee:	Originating Source:	Planned and Coordinated Efforts and Activities with Connectee:
N/A					



**MINIMUM CONTROL MEASURE #4:  
CONSTRUCTION SITE STORMWATER RUNOFF CONTROL  
(Part IV.B.4 General Permit)**

**SECTION I. OVERALL EVALUATION:**

<b>GENERAL SUMMARY, STATUS, APPROPRIATENESS AND EFFECTIVENESS OF MEASURABLE GOALS:</b>	
<p>Include information relevant to the implementation of each measurable goal, such as activities implemented to support the review, issuance and tracking of permits, inspections and receipt of complaints. Discuss activities to be carried out during the next reporting cycle. If addressing TMDL requirements, please indicate rationale for the activities chosen to address the pollutant of concern.</p> <p><b>(Note: Identify parties responsible for achieving the measurable goals and reference any reliance on another entity for achieving measurable goals. Mark with an asterisk (*) if this person/entity is different from last year.)</b></p> <p><b>Responsible Party Contact Name &amp; Title:</b> William C. Bombard, P.E., City Engineer  <b>Phone:</b> 401.680.7535                      <b>Email:</b> wbombard@providenceri.gov</p>	
IV.B.4.b.1	<p>Indicate if the Sediment and Erosion Control and Control of Other Wastes at Construction Sites ordinance was <b>not</b> developed, adopted, and submitted to RIDEM, explain reasons why, submit proposed schedule for completion and identify person(s) / Department and/or parties responsible for the completion of this requirement.</p> <p><b>Date of Adoption:</b> 12/08/05 (Soil Erosion and Sediment Control – No. 568)          If the Ordinance was amended in 2020, please indicate why changes were necessary. <b>Please also indicate if amendments have been made based on the 2010 RI Stormwater Design and Installation Standards Manual, and provide references to the amended portions of the local codes/ordinances.</b></p>
<p>Amendments have not been made based on the 2010 RI Stormwater Design and Installation Standards Manual.</p>	
IV.B.4.b.6	<p>Use the space below to describe actions taken as a result of receipt and consideration of information submitted by the public.</p>
<p>The City maintains a computer-based service request system to receive citizen inquiries and complaints by phone and e-mail. The system is capable of generating work orders and will automatically email citizens upon fulfillment of a service request.</p> <p>The Department of Public Works and/or the Department of Inspections and Standards is responsible for responding to considerations and complaints. This measure is effective as response times range from 12-72 hours. Responses to complaints or requests for action are reported back to the citizens through the program.</p>	
IV.B.4.b.8	<p>Use the space below to describe activities and actions taken as a result of referring to the State non-compliant construction site operators. The operator may rely on the Department for assistance in enforcing the provisions of the RIPDES General Permit for Stormwater Discharges Associated with Construction Activity to the MS4 if the operator of the construction site fails to comply with the local and State requirements of the permit and the non-compliance results or has the potential to result in significant adverse environmental impacts.</p>
<p>All site plans undergo a pre-construction review. The Department of Public Works, Engineering Division and Department of Inspection and Standards, Building Official are responsible for this goal.</p> <p>The City does not perform erosion and sediment control inspections. The Department of Inspections and Standards requires the submittal of a RIDOA form 128, which requires the engineer/architect to account and to submit reports certifying compliance with submitted plans and specifications outlined in RIGL 23-27.3 Section 128.0 of the RI Building Code.</p> <p>Non-compliant construction site operators are referred to the relevant agencies (DPW, RIDEM, CRMC, Narragansett Bay Commission, etc.). Non-compliant sites may be referred by the engineer/architect (via Form 128 requirements), by the public, or as observed by the Department of Public Works or the Department of Inspections and Standards.</p>	
<p>Additional Measurable Goals and Activities</p> <p>Public comment and information regarding new development projects and construction runoff related impacts are available at the Department of Inspections and Standards upon request.</p>	

**CONSTRUCTION SITE STORMWATER RUNOFF CONTROL cont'd**

**SECTION II. A - Plan and SWPPP/SESC Plan Reviews during Year 17 (2020), Part IV.B.4.b.2:** Issuance of permits and/or implementation of policies and procedures for all construction projects resulting in land disturbance of greater than 1 acre.  
**Part IV.B.4.b.4:** Review 100% of plans and SWPPPs/SESC Plans for construction projects resulting in land disturbance of 1-5 acres must be conducted by adequately trained personnel and incorporate consideration of potential water quality impacts.

# of Construction Applications Received: 15 # of Construction Reviews Completed: 15 # of Permits/Authorizations Issued: 15	
Summary of Reviews and Findings, include an evaluation of the effectiveness of the program.  The City's Chief Engineer is responsible for reviewing the site plans as well as the SWMPPP and SESC. The Department of Inspections and Standards requires the submittal of a RIDOA form 128 by the engineer of record, requiring reports certifying compliance with submitted plans and specifications. Additional plan requirements can be found in the City's Code of Ordinances, Chapter 5, Sections 5-104 and 5-105. <a href="https://library.municode.com/ri/providence/codes/code_of_ordinances?nodet=PTIICOOR_CH5BUSTAP_ARTVIISOERSECO">https://library.municode.com/ri/providence/codes/code_of_ordinances?nodet=PTIICOOR_CH5BUSTAP_ARTVIISOERSECO</a>	
NOTE: The City of Providence has a lower threshold requirement than the RIPDES permit. The City requires a SWPPP for any development of redevelopment disturbing 20,000 square feet or greater.	
Identify person(s) /Department and/or parties responsible for the implementation of this requirement: The Building Official and City Engineer are responsible for implementation of this minimum measure.	

**SECTION II.B - Erosion and Sediment Control Inspections during Year 17 (2020), Parts IV.G.2.n and IV.B.4.b.7:** Inspection of 100% of all construction projects within the regulated area that discharge or have the potential to discharge to the MS4. (The program must include two inspections of all construction sites, first inspection to be conducted during construction for compliance of the Erosion and Sediment controls at the site, the second to be conducted after the final stabilization of the site.) Inspections must be conducted by adequately trained personnel.

# of Active Construction Projects: 0	
# of Site Inspections: Minimum of 30	# of Complaints Received: 0
# of Violations Issued: 0	# of Unresolved Violations Referred to RIDEM: 0
Summary of Enforcement Actions, include an evaluation of the effectiveness of the program.  The Department of Inspections and Standards performs at least two site inspections during project construction; first when the top soil is removed and the erosion controls are installed and again when the final grading is established. In addition, the City inspects active construction site after precipitation events. If, during an inspection, the site is non-compliant, the contractor is ordered to immediately address the issues. If non-compliance continues, a \$200 fine may be issued with an additional \$50 per day of continued non-compliance.	
Identify person(s) /Department and/or parties responsible for the implementation of this requirement: The Building Official, Department of Inspections and Standards is responsible for the implementation of this requirement.	
Identify the type and date of training this person(s)/parties has/have received to be considered "adequately trained": The Building Official has not received formal training on erosion and sediment control inspections. The Department of Inspections and Standards is looking into training inspectors in 2021.	



**MINIMUM CONTROL MEASURE #5:  
POST CONSTRUCTION STORMWATER MANAGEMENT IN NEW DEVELOPMENT AND  
REVELOPMENT  
(Part IV.B.5 General Permit)**

**SECTION I. OVERALL EVALUATION:**

**GENERAL SUMMARY, STATUS, APPROPRIATENESS AND EFFECTIVENESS OF MEASURABLE GOALS:**

Include information relevant to the implementation of each measurable goal, such as activities implemented to support the review, issuance and tracking of permits, inspections and receipt of complaints, etc. Please indicate if any projects have incorporated the use of Low Impact Development techniques. Discuss activities to be carried out during the next reporting cycle. If addressing TMDL requirements, please indicate rationale for the activities chosen to address the pollutant of concern.

**(Note: Identify parties responsible for achieving the measurable goals and reference any reliance on another entity for achieving measurable goals. Mark with an asterisk (\*) if this person/entity is different from last year.)**

**Responsible Party Contact Name & Title:** William C. Bombard, P.E., City Engineer

**Phone:** 401.680.7535

**Email:** wbombard@providenceri.gov

IV.B.5.b.5	Use the space below to describe activities and actions taken to coordinate with existing State programs requiring post-construction stormwater management.
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The City has actively required developers of parcels more than 20,000 SF to conform to the Post-Construction Storm Water Management Ordinance. The City will continue to coordinate with all existing RIPDES programs, including sites with an acre or more of disturbance.

IV.B.5.b.6	Use the space below to describe actions taken for the referral to RIDEM of new discharges of stormwater associated with industrial activity as defined in RIPDES Rule 31(b)(15) (the operator must implement procedures to identify new activities that require permitting, notify RIDEM, and refer facilities with new stormwater discharges associated with industrial activity to ensure that facilities will obtain the proper permits).
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In the reporting year, there were 9 permitted stormwater connections to the City of Providence sewer network (MS4 and combined system), none of which were associated with industrial activity.

IV.B.5.b.9	Indicate if the Post-Construction Runoff from New Development and Redevelopment Ordinance was <b>not</b> developed, adopted, and submitted to RIDEM, explain reasons why, submit proposed schedule for completion and identify person(s) / Department and/or parties responsible for the completion of this requirement. <b>Date of Adoption:</b> 12/08/05 (Post Construction – Storm Water Control – No. 567) If the Ordinance was amended in 2020, please indicate why changes were necessary. <b>Please also indicate if amendments have been made based on the 2010 RI Stormwater Design and Installation Standards Manual, and provide references to the amended portions of the local codes/ordinances.</b>
------------	---

The City is looking into updating the Post-Construction Runoff from New Development and Redevelopment Ordinance to include language requiring developers to address TMDL's when developing in a polluted waterbody's watershed.

IV.B.5.b.12	Use the space below to describe activities and actions taken to identify existing stormwater structural BMPs discharging to the MS4 with a goal of ensuring long term O&M of the BMPs.
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All municipal owned BMP's are known and listed in the attachment labeled "Municipal BMP's" but are not distinguished by MS4 or combined sewer system watersheds.

The City has coordinated with RIDOT and NBC for identification of existing structural BMP's in past reporting years. New BMP's are identified during plan review stages by the Engineering Division at DPW. Developers are required to submit a Stormwater Management Plan and an O&M inspection schedule and maintenance checklist with their plans. A comprehensive list of privately-owned BMP's has been developed and mapped on GIS with attributes including owner, required O&M, maintenance contact, etc.

**Additional Measurable Goals and Activities**

The City continues to administer an on-street overnight parking program to discourage illegal installation of impervious parking areas in residential lots.

**POST CONSTRUCTION STORMWATER MANAGEMENT IN NEW DEVELOPMENT AND REDEVELOPMENT**  
**cont'd**

**SECTION II.A. - Plan and SWPPP/SESC Plan Reviews during Year 17 (2020), Part IV.B.5.b.4:** Review 100% of post-construction BMPs for the control of stormwater runoff from new development and redevelopment projects that result in discharges to the MS4 which incorporates consideration of potential water quality impacts (the program requires reviewing 100% of plans for development projects greater than 1 acre, not reviewed by other State programs). Plan reviews must be conducted by adequately trained personnel.

# of Post-Construction Applications Received: 15
# of Post-Construction Reviews Completed: 15
# of Permits/Authorizations Issued: 15
Summary of Reviews and Findings, include an evaluation of the effectiveness of the program.
<p>The City's Chief Engineer is responsible for reviewing the site plans as well as the associated hydraulic models and calculations for two-year, ten-year, twenty-five-year, and one hundred-year storms. Additional plan requirements can be found in the City's Code of Ordinances, Chapter 5, Section 5-87.</p> <p><a href="https://library.municode.com/ri/providence/codes/code_of_ordinances?nodet=PTIICOOR_CH5BUSTAP_ARTVIISOERSECO">https://library.municode.com/ri/providence/codes/code_of_ordinances?nodet=PTIICOOR_CH5BUSTAP_ARTVIISOERSECO</a></p> <p>NOTE: The City of Providence has a lower threshold requirement than the RIPDES permit. The City requires a SWPPP for any development of redevelopment disturbing 20,000 square feet or greater.</p> <p>Identify person(s) /Department and/or parties responsible for the implementation of this requirement: The City Engineer, William C. Bombard, P.E., is responsible for implementing this measure.</p> <p>Identify the type and date of training this person(s)/parties has/have received to be considered "adequately trained": Bill Bombard, Chief Engineer, is self-taught in plan review from many years of professional experience.</p>

**SECTION II.B. - Post Construction Inspections during Year 17 (2020), Parts IV.G.2.o and IV.B.5.b.10 - Proper Installation of Structural BMPs:** Inspection of BMPs, to ensure these are constructed in accordance with the approved plans (the program must include inspection of 100% of all development greater than one acre within the regulated areas that result in discharges to the MS4 regardless of whom performs the review). Inspections must be conducted by adequately trained personnel.

# of Active Construction Projects: 0	# of Construction Projects Completed: 15
# of Site Inspections for proper Installation of BMPs: 15	# of Complaints Received: 0
# of Violations Issued: 0	# of Unresolved Violations Referred to RIDEM: 0
Summary of Enforcement Actions:	
<p>The Department of Inspections and Standards completes their final site inspection once all construction is completed. Due to numerous site inspections during construction, it is unlikely to post-construction non-compliance but if so, the contractor is order to immediately address the issue. If non-compliance continues, a \$200 fine may be issued with an additional \$50 per day of continued non-compliance.</p> <p>Identify person(s) /Department and/or parties responsible for the implementation of this requirement: The City's Building Official is responsible for implementing this requirement.</p> <p>Identify the type and date of training this person(s)/parties has/have received to be considered "adequately trained": The Building Official has not received training on proper installation of structural BMPs. The Department of Inspections and Standards is looking into training inspectors in 2021.</p>	

**POST CONSTRUCTION STORMWATER MANAGEMENT IN NEW DEVELOPMENT AND REDEVELOPMENT**  
*cont'd*

**SECTION II.C. - Post Construction Inspections during Year 17 (2020), Parts IV.G.2.p and IV.B.5.b.11 - Proper Operation and Maintenance of Structural BMPs:** Describe activities and actions taken to track required Operations and Maintenance (O&M) actions for site inspections and enforcement of the O&M of structural BMPs. Tracking of required O&M actions for site inspections and enforcement of the O&M of structural BMPs.

# of Site Inspections for proper O&M of BMPs: 0	# of Complaints Received: 0
# of Violations Issued: 0	# of Unresolved Violations Referred to RIDEM: 0
Summary of Activities and Enforcement Actions. Evaluate the effectiveness of the Program in minimizing water quality impacts.  Proper operations and maintenance of post construction BMPs has not been enforced in the reporting year. The City is currently working on incorporating this requirement by enforcing private BMP owners to submit an annual report to confirm their BMP O&M compliance.  Identify person(s) /Department and/or parties responsible for the implementation of this requirement: The Department of Public Works, Engineering Division is responsible for implementing this requirement.	



**Strategies for requiring the use of non-structural Low Impact Development (LID) site design practices and techniques into stormwater management designs for new and redevelopment projects, check all that apply in your municipality/MS4:**

- None
- Ordinances or by-laws requiring LID standards (e.g. reduced road widths, % conservation land, etc.)
- Ordinances or by-laws requiring LID design at conceptual review (i.e., Pre-application and/or Master Plan) stages for municipal review prior to plans being engineered.
- Ordinances or by-laws requiring LID standards only in impaired waterbody drainage areas
- Local development regulations requiring use of LID to the maximum extent practicable
- LID Guidance available in written form
- LID Guidance available at pre-application meetings
- Other strategies to ensure incorporation of LID to the maximum extent practicable, describe:  
\_\_\_\_\_  
\_\_\_\_\_

Person(s)/Department responsible for reviewing submissions for LID:

The Department of Public Works and the Department of Planning and Development are responsible for reviewing submissions.

Person(s)/Department/Board responsible for approving submissions for LID at Preliminary and/or Final Review, if applicable:

The Department of Public Works and the Department of Planning and Development are responsible for approving submissions.

**Are you aware of the Municipal LID Self-Assessment that was introduced by the DEM and RI NEMO in 2019 and finalized and distributed in March 2020?**

- Yes  No

**A final version of the Municipal LID Self-Assessment is available on the DEM's website:**

<http://www.dem.ri.gov/programs/benviron/water/permits/ripdes/stwater/t4guide/lid-checklist-primer.pdf>

**Additional guidance is also available:**

<http://www.dem.ri.gov/programs/benviron/water/permits/ripdes/stwater/t4guide/lid-assessment-fs.pdf>

<http://www.dem.ri.gov/programs/benviron/water/permits/ripdes/stwater/pdfs/lidfactsheet.pdf>

<http://www.dem.ri.gov/programs/benviron/water/permits/ripdes/stwater/t4guide/lidplan.pdf>

**Did your community complete the Municipal LID Self-Assessment in 2020?**  Yes  No

**If yes, please provide a copy as an attachment to this Annual Report.**

**If no, does your community plan to complete it?**

- Yes  No

If No, why not? \_\_\_\_\_  
\_\_\_\_\_

**POST CONSTRUCTION STORMWATER MANAGEMENT IN NEW DEVELOPMENT AND REDEVELOPMENT**  
*cont'd*

**Strategies being implemented to ensure long-term Operation and Maintenance (O&M) of privately-owned structural stormwater BMPs, check all that apply in your municipality/MS4:**

- None
- Ordinances or by-laws identify BMP inspection responsible party
- Ordinances or by-laws identify BMP maintenance responsible party
- Ordinances or by-laws identify BMP inspections and maintenance requirements
- Ordinances or by-laws provide for easements or covenants for inspections and maintenance
- Ordinances or by-laws require for every constructed BMP an inspections and maintenance agreement
- Ordinances or by-laws contain requirements for documenting and detailing inspections
- Ordinances or by-laws contain requirements for documenting and detailing maintenance
- Ordinances or by-laws contain authority to enforce for lack of maintenance or BMP failure
- The MS4 is responsible for inspections of all privately-owned BMPs
- The MS4 is responsible for maintenance of all privately-owned BMPs
- Establishment of escrow account for use in case of failure of BMP
- Other strategies to ensure long-term O&M of privately-owned BMPs, describe:  
     Fines or liens for failure to implement or respond.

Does your municipality/MS4 require the use BMPs Operations and Maintenance Agreements?       YES     NO

If YES, please indicate if the Operations and Maintenance Agreements include the following:

a. Party responsible for the long-term O&M of permanent stormwater management BMPs	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
b. A description of the permanent stormwater BMPs that will be operated and maintained	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
c. The location of the permanent stormwater BMPs that will be operated and maintained	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
d. A timeframe for routine and emergency inspections and maintenance of all permanent stormwater management BMPs	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
e. A requirement that all inspections and maintenance activities are documented	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
f. Annual submission of inspection/maintenance certification/documentation to the MS4	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
g. Stormwater management easement for access for inspections and maintenance or the preservation of stormwater runoff conveyance, infiltration, and detention areas and other stormwater controls and BMPs by persons other than the property owner	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
h. Steps available for addressing a failure to maintain the stormwater controls and BMPs	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO

Please elaborate, if appropriate:

The Department of Public Works and Department of Inspections and Standards are working on securing a process for BMP inspection, annual submission of O&M activities, and failure enforcement.

Does your municipality/MS4 keep an inventory of privately-owned BMPs?       YES     NO

**For privately-owned structural BMPs**, does your municipality/MS4 have a system for tracking:

a. Agreements and arrangements to ensure O&M of BMPs?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
b. Inspections?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
c. Maintenance and schedules?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
d. Complaints?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
e. Non-Compliance?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
f. Enforcement actions?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO

Do you use an electronic tool (e.g. GIS, database, spreadsheet) to track post-construction BMPs, inspections, and maintenance?       YES       NO

If yes, please elaborate on which tools are used:

\_\_\_\_\_

\_\_\_\_\_

*NOTE: BMP maintenance tasks can be a great way to involve and educate the community to their purpose and function. BMPs have the potential to create a highly interactive environment for community members and volunteers to get involved.*



**MINIMUM CONTROL MEASURE #6:  
POLLUTION PREVENTION AND GOOD HOUSEKEEPING IN MUNICIPAL OPERATIONS  
(Part IV.B.6 General Permit)**

**SECTION I. OVERALL EVALUATION:**

<b>GENERAL SUMMARY, STATUS, APPROPRIATENESS AND EFFECTIVENESS OF MEASURABLE GOALS:</b>	
<p>Include information relevant to the implementation of each measurable goal, such as activities and practices used to address on-going requirements, and personnel responsible. Discuss activities to be carried out during the next reporting cycle. If addressing TMDL requirements, please indicate rationale for the activities chosen to address the pollutant of concern.</p> <p><b>(Note: Identify parties responsible for achieving the measurable goals and reference any reliance on another entity for achieving measurable goals. Mark with an asterisk (*) if this person/entity is different from last year.)</b></p> <p><b>Responsible Party Contact Name &amp; Title:</b> William C. Bombard, P.E., City Engineer  <b>Phone:</b> 401.680.7535      <b>Email:</b> wbombard@providenceri.gov</p>	
IV.B.6.b.1.i	<p>Use the space below to describe activities and actions taken to identify structural BMPs (these include but are not limited to: retention/detention basins, vegetated treatment, infiltration and pre-treatment controls, etc.) owned or operated by the small MS4 operator (the program must include identification and listing of the specific location and a description of all structural BMPs in the SWMPP and update the information in the Annual Report). Evaluate appropriateness and effectiveness of this requirement.</p> <p><b>Do you have an inventory of MS4-owned/operated BMPs?</b>      <input checked="" type="checkbox"/> YES      <input type="checkbox"/> NO</p> <p><b>Total # of MS4-owned/operated BMPs</b> (does not include CBs or MHs): 58</p>
<p>Structural BMPs owned and maintained by the City are known and listed in the attachment labeled "Municipal BMP's." A large majority of municipal BMPs are within the many City-owned parks throughout Providence. Over the past couple of years, the Parks Department has made a tremendous effort in incorporating green infrastructure within Roger Williams Park, including the new Stormwater Innovation Center. Additionally, the Department of Public Works has worked with Groundwork Rhode Island to install right-of-way bioswales within residential sidewalks.</p>	
IV.B.6.b.1.ii	<p>Use the space below to describe activities and actions taken for inspections, cleaning and repair of detention/retention basins, storm sewers and catch basins with appropriate scheduling given intensity and type of use in the catchment area. Evaluate appropriateness and effectiveness of this requirement.</p> <p><b># of MS4-owned/operated BMPs inspected in 2020:</b> 58</p> <p><b># of MS4-owned/operated BMPs maintained/cleaned in 2020:</b> 48</p> <p><b># of MS4-owned/operated BMPs repaired in 2020:</b> 0</p> <p>Does your municipality/MS4 have a system for tracking:</p> <p>a. Inspection schedules of MS4-owned BMPs?      <input type="checkbox"/> YES      <input checked="" type="checkbox"/> NO</p> <p>b. Maintenance/cleaning schedules of MS4-owned BMPs?      <input type="checkbox"/> YES      <input checked="" type="checkbox"/> NO</p> <p>c. Repairs, corrective actions needed?      <input type="checkbox"/> YES      <input checked="" type="checkbox"/> NO</p> <p>d. Complaints?      <input checked="" type="checkbox"/> YES      <input type="checkbox"/> NO</p> <p>Do you use an electronic tool (e.g. GIS, database, spreadsheet) to track stormwater BMPs, inspections, and maintenance?      <input checked="" type="checkbox"/> YES      <input type="checkbox"/> NO</p>
<p>All municipal BMP's were maintained in the reporting year except for the 10 right-of-way bioswales installed by Groundwork Rhode Island. The Parks Department uses an electronic tool called Green Cities, which is a program that automatically develops work orders and sends them to the appropriate employee to make corrective actions. This tool has proven to be extremely effective.</p>	

**POLLUTION PREVENTION AND GOOD HOUSEKEEPING IN MUNICIPAL OPERATIONS cont'd**

IV.B.6.b.1.iii	<p>Use the space below to describe activities and actions taken to support the requirement of yearly inspection and cleaning of all catch basins (a lesser frequency of inspection based on at least two consecutive years of operational data indicating the system does not require annual cleaning might be acceptable). Evaluate appropriateness and effectiveness of this requirement.</p> <p><b>Total # of CBs within regulated area (including SRPW and TMDL areas):</b> Approximately 14,300 catch basins and inlets, half of which are in the MS4 and half in the combined system. Numbers below are reflective of both systems.</p> <p><b># of CBs inspected in 2020:</b> 2,365      <b>% of Total inspected:</b> 16.5%</p> <p><b># of CBs cleaned in 2020:</b> 2,365      <b>% of Total cleaned:</b> 16.5%</p> <p>Quantity of sand/debris collected by cleaning of catch basins: 683.73 tons</p> <p>Location used for the disposal of debris: Rhode Island Resource Recovery Corporation</p> <p>Do you use an electronic tool (e.g. GIS, database, spreadsheet) to track the inspections and cleaning of catch basins?                              <input checked="" type="checkbox"/> YES                              <input type="checkbox"/> NO</p>
<p>Catch basin digger trucks are assigned to clean as many catch basins in two wards per month. There are 15 Wards in the City, with the trucks rotating between all wards regularly. Catch basins are also cleaned as needed, or as reported by the public. Also, locations prone to flooding are cleaned regularly. After a basin has been cleaned, visual observations are made by the operator. If a deficiency exists, it is reported to the Sewer Superintendent. Although only a fraction of the City's catch basins was cleaning, this measure is effective since catch basin cleaning occurs every day.</p> <p>The City is looking into tracking the catch basin cleaning activities via GIS instead of a spreadsheet. This is in the works and, with the City's Sewer/Stormwater GIS recently being completed, is hopeful to start in 2021.</p>	
IV.B.6.b.1.iv	<p>Use the space below to describe activities and actions taken to minimize erosion of road shoulders and roadside ditches by requiring stabilization of those areas. Evaluate appropriateness and effectiveness of this requirement.</p>
<p>The majority of City owned roads are constructed with a curb and gutter system. At locations where erosion is evident, efforts are made to stabilize the erosion. This is an appropriate measure due to the fact that the City is extensively built with a curb and gutter system therefore limiting erosion of road shoulders. As road resurfacing and reconstruction projects occur, efforts are made to increase curb reveal to facilitate proper drainage. The DPW Engineering Department and Highway Department are responsible for this measure.</p> <p>There is one area of erosion on Irving Avenue and River Road that the City has attempted to stabilize multiple times. After a RIDOT resurfacing project, the curb reveal was eliminated, forcing runoff onto the sidewalk and grassed areas. The areas of erosion have been filled with asphalt and crushed stone until a more permanent solution can be contracted. The Department of Public Works and Planning Department are currently working with Crossman Engineering to design to depave a portion of the area, divert runoff to a series of green infrastructure to armor the riverbank. This project is highlighted as a Sample Environmental Project in the Consent Agreement and is planned for late 2021 or 2022 construction.</p>	
IV.B.6.b.1.v	<p>Use the space below to describe activities and actions taken to identify and report known discharges causing scouring at outfall pipes or outfalls with excessive sedimentation, for the Department to determine on a case-by-case basis if the scouring or sedimentation is a significant and continuous source of sediments. Evaluate appropriateness and effectiveness of this requirement.</p>
<p>There are no known discharges causing scouring at outfall pipes.</p> <p>Excessive sedimentation is found at the forebay at York Pond. The forebay is cleaned to the maximum extent possible, as needed. This is the responsibility of the Parks Department.</p> <p>In the reporting year, sand has been used in 1 isolated location, Citywide. DPW is making an effort to eliminate sand usage totally during winter storm events, substituted for only salt.</p>	



**POLLUTION PREVENTION AND GOOD HOUSEKEEPING IN MUNICIPAL OPERATIONS cont'd**

IV.B.6.b.6	<p>Use the space below to describe all employee training programs used to prevent and reduce stormwater pollution from activities such as park and open space maintenance, fleet and building maintenance, new construction and land disturbances, and stormwater system maintenance for the past calendar year, including staff municipal participation in the URI NEMO stormwater public education and outreach program and all in-house training conducted by municipality or other parties. Evaluate appropriateness and effectiveness of this requirement.</p> <p>How many stormwater management trainings have been provided to <i>municipal employees</i> during this reporting period? Unknown, six (6) were attended by municipal employees.</p> <p>What was the date of the last training? 10/23/2020</p> <p>How many <i>municipal employees</i> have been trained in this reporting period? 4</p> <p>What percent of <i>municipal employees</i> in relevant positions and departments received stormwater management training? Not Tracked</p> <p>Have <i>municipal employees</i> that are responsible for inspecting or cleaning catch basins also been trained to detect and report illicit connections or non-stormwater discharges? No</p>
<p>Training opportunities are presented to municipal employees via email and the employee is responsible for signing up for applicable trainings related to their job. The most common sender on training opportunities is the SNEP Network, the Rhode Island Department of Environmental Management, the Rhode Island Department of Transportation, the American Public Works Association, and stormwater conscious organization that the City is associated with, such as the Green Infrastructure Coalition.</p>	
IV.B.6.b.7	<p>Use the space below to describe actions taken to ensure that new flow management projects undertaken by the operator are assessed for potential water quality impacts and existing projects are assessed for incorporation of additional water quality protection devices or practices. Evaluate appropriateness and effectiveness of this requirement.</p> <p>The City continues to assess potential water quality impacts to existing and new flow management projects as areas are being developed or redeveloped and as potential water quality impacts arise during the permitting process. This proves to be an effective and appropriate means to review water quality impacts. If detrimental water quality impacts are foreseen, a permit will not be issued to move forward.</p> <p>The City Engineer is responsible for this action.</p> <p>Additional Measurable Goals and Activities</p> <p>The Parks Department continues to coddle Canadian Geese eggs in association with the US Fish &amp; Wildlife Service to limit the amount of waterfowl and their waste pollutants. The Parks Department has implemented many maintenance procedures, relative to stormwater, including but not limited to: mowing grass slope at higher height to provide filtration, removal of sediment in stormwater retro-fits 3 times per year, and leaving areas of turf adjacent to Park waterbodies unmowed for most of the year.</p>

**SECTION II.A - Structural BMPs (Part IV.B.6.b.1.i)** These include but are not limited to: retention/detention basins, vegetated treatment, infiltration and pre-treatment controls, etc.

BMP ID:	Location:	Name of BMP Owner/Operator:	Description of BMP:	Frequency of Inspection:
	See Attached			

**SECTION II.B - Discharges Causing Scouring or Excessive Sedimentation (Part IV.B.6.b.1.v)**

Outfall ID:	Location:	Description of Problem:	Description of Remediation Taken, include dates:	Receiving Water Body Name/Description:
N/A				

**POLLUTION PREVENTION AND GOOD HOUSEKEEPING IN MUNICIPAL OPERATIONS cont'd**

**SECTION II.C - Note any planned municipal construction projects/opportunities to incorporate water quality BMPs, low impact development, or activities to promote infiltration and recharge (Part IV.G.2.j).**

The Forestry Division of the Parks Department continues its yearly neighborhood tree planting program. Some trees are planted in existing tree wells, however the majority are planted in new tree wells, resulting in a decrease of impervious area.

The Department of Public Works and Planning Department are working in conjunction with a design consultant, Crossman Engineering, to provide plans and specifications for the Irving Ave/River Road/Seekonk River green infrastructure retrofit. This project will provide sediment and erosion control along Irving Ave as well as introduce infiltration through several retention filters. The project will also address the erosion on the Seekonk River riverbank. This project is waiting on RIDEM approval for the final plan set before posting an RFP.

The Department of Public Works is working with a consultant, Crossman Engineering, to design an access road to maintain and service a sanitary sewer line running parallel to a wetland adjacent to the Seekonk River. This sanitary line has been known to surcharge in the past during heavy rain storms so having access to the line is paramount. This project is currently working on a mitigation plan to offset the environmental effects of installing the access road. The plan will likely consist of removing invasive vegetation within the project area.

Groundwork Rhode Island was been working with the City to install right-of-way bioswales in residential sidewalks. All bioswales are strategically located just upstream of drainage structures to promote infiltration and increase the water quality entering the MS4. These bioswales are great for Providence, not only for the water quality benefits, but also for public education and public involvement in stormwater management. All property owners are consulted on the right-of-way bioswale before they're installed.

**SECTION II.D - Please include a summary of results of any other information that has been collected and analyzed. This includes any type of data (Part IV.G.2.e).**



# TOTAL MAXIMUM DAILY LOAD (TMDL) or other Water Quality Determination REQUIREMENTS

**SECTION I. If you have been notified that discharges from your MS4 require non-structural or structural stormwater controls based on an approved TMDL or other water quality determination, please provide an assessment of the progress towards meeting the requirements for the control of stormwater identified in the approved TMDL (Part IV.G.2.d). Please indicate rationale for the activities chosen to address the pollutant of concern.**

**(Note: Identify parties responsible for achieving the measurable goals and reference any reliance on another entity for achieving measurable goals. Mark with an asterisk (\*) if this person/entity is different from last year.)**

**Responsible Party Contact Name & Title:** William C. Bombard, P.E., City Engineer

**Phone:** 401.680.7535

**Email:** wbombard@providenceri.gov

LIST OF IMPAIRED WATERS:				
Impaired Water Body: Mashapaug Pond  WBID: MASH	Pollutants Causing Impairments: Total Phosphorous and Bacteria	Has TMDL been completed? Has MS4 been notified of TMDL requirements? Has MS4 developed a Scope of Work or TMDL Implementation Plan?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
Impaired Water Body: Roger Williams Park Ponds  WBID: RWP	Pollutants Causing Impairments: Total Phosphorous and Bacteria	Has TMDL been completed? Has MS4 been notified of TMDL requirements? Has MS4 developed a Scope of Work or TMDL Implementation Plan?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	
Impaired Water Body: Woonasquatucket River  WBID: WOON	Pollutants Causing Impairments: Bacteria	Has TMDL been completed? Has MS4 been notified of TMDL requirements? Has MS4 developed a Scope of Work or TMDL Implementation Plan?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
Impaired Water Body: West River  WBID: WEST	Pollutants Causing Impairments: Bacteria	Has TMDL been completed? Has MS4 been notified of TMDL requirements? Has MS4 developed a Scope of Work or TMDL Implementation Plan?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
What kind of public education and outreach strategy does the MS4 implement to target each pollutant of concern? (e.g., signage on installed stormwater controls, resources on website, pamphlets about litter, pet waste, grass clippings, fertilizer use, etc.)				
Pollutant of Concern: Bacteria in the Roger Williams park Ponds	Strategy: Install signage discouraging citizens to feed the wild life, especially the geese.	Target Audience: Roger Williams Park attendees		
Has the MS4 installed stormwater BMPs or required the installation of stormwater BMPs on private property to address impairments? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO				
If yes, indicate the name of the impaired water body associated with the stormwater control, type of stormwater control, date installed, ownership, and who is responsible for maintenance:				
Impaired Water Body: Roger Williams Parks Ponds	Type of Stormwater Control: Bioretention Pond	Date Installed: Several Installed	<input checked="" type="checkbox"/> Municipally Owned <input type="checkbox"/> Privately Owned	Who maintains it? Park Department
Additional enhanced minimum measures used to address water quality issues (e.g., increased street sweeping or catch basin cleaning in areas with high pollutant loading, installation of floatable traps/screens, etc.):				
-Street sweeping and catch basin cleaning activities occur more frequently in known flooding zones.				





## SPECIAL RESOURCE PROTECTION WATERS (SRPWs)

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**SECTION I.** In accordance with Rule 31(a)(5)(i)G of the *Regulations for the Rhode Island Pollutant Discharge Elimination System (RIPDES Regs)*, on or after March 10, 2008, any discharge from a small municipal separate storm sewer system to any Special Resource Protection Waters (SRPWs) or impaired water bodies within its jurisdiction must obtain permits if a waiver has not been granted in accordance to Rule 31(g)(5)(iii). A list of SRPWs can be found in Appendix D of the *RIDEM Water Quality Regulations* at this link:

<http://www.dem.ri.gov/pubs/regs/regs/water/h20q09a.pdf>

The 2008 303(d) Impaired Waters list can be found in Appendix G of the *2008 Integrated Water Quality Monitoring and Assessment Report* at this link: <http://www.dem.ri.gov/programs/benviron/water/quality/pdf/iwqmon08.pdf>

**If you have discharges from your MS4 (regardless of its location) to any of the listed SRPWs or impaired waters (including impaired waters when a TMDL has not been approved), please provide an assessment of the progress towards expanding the MS4 Phase II Stormwater Program to include the discharges to the aforementioned waters and adapting the Six Minimum Control Measures to include the control of stormwater in these areas. Please indicate a rationale for the activities chosen to protect these waters. Please note that all of the measurable goals and BMPs required by the 2003 MS4 General Permit may not be applicable to these discharges.**

No direct efforts have been taken towards the progress of expanding the MS4 Stormwater Program to SPRW's/303(d)'s. As mentioned earlier in the report, there are numerous neighborhood and community partners working within all watersheds with a varied target audience.

SPRWs in Providence: Providence River, Upper Narragansett Bay, Moshassuck River, Woonasquatucket River.



# RHODE ISLAND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

Office of Water Resources



## INSTRUCTIONS FOR THE RI POLLUTANT DISCHARGE ELIMINATION SYSTEM (RIPDES)

### SMALL MUNICIPAL SEPARATE STORM SEWER SYSTEMS AND INDUSTRIAL ACTIVITY AT ELIGIBLE FACILITIES OPERATED BY REGULATED SMALL MS4s ANNUAL REPORT FORM

#### **WHO MUST SUBMIT AN ANNUAL REPORT:**

Owners/Operators of regulated small municipal separate storm sewer systems (MS4s) and industrial activities authorized to discharge stormwater under the Rhode Island Pollutant Discharge Elimination System (RIPDES) Stormwater General Permit for Small Municipal Separate Storm Sewer Systems and Industrial Activity at Eligible Facilities Operated by Regulated Small MS4s (hereafter referred to as "the General Permit"), must submit an Annual Report, outlined in Part IV.G of the permit. The Report must be submitted each year after permit issuance by March 10<sup>th</sup> to track progress of compliance. If you have questions regarding this Annual Report Form contact Jennifer Stout of the Rhode Island Department of Environmental Management (RIDEM), Office of Water Resources, Permitting Section at (401) 222-4700 ext. 7726.

The Annual Report must be submitted to:

RIDEM  
Office of Water Resources  
RIPDES Program  
Permitting Section  
235 Promenade Street  
Providence, RI 02908  
ATTN: Jennifer Stout

#### **INSTRUCTIONS FOR COMPLETION:**

##### **GENERAL INFORMATION PAGE:**

###### *"RIPDES Permit #"*

Include your permit ID # to ensure proper tracking.

###### *"Operator of MS4"*

Give the legal name of the person, firm, public (municipal) organization, or any other entity that is responsible for day-to-day operations of the MS4 described in this application (RIPDES Rules 3 & 12). Enter the complete address and telephone number of the operator. Circle the appropriate choice to indicate the legal status of the operator of the MS4.

###### *"Owner of MS4"*

If the owner is the same as the operator do not complete this section. Give the legal name of the person, firm, public (municipal) organization, or any other entity that owns the MS4 described in this application (RIPDES

Rules 3 & 12). Do not use a colloquial name. Enter the complete address and telephone number of the owner.

###### *"Certification"*

State and federal statutes provide for severe penalties for submitting false information on this application form. State and federal regulations require this application to be signed as follows (RIPDES Rule 12);

*For a corporation:* by a responsible corporate officer, which means: (i) president, secretary, treasurer, or vice president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision making functions, or (ii) the manager of one or more manufacturing, production, or operating facilities, provided the manager is authorized to make management decisions which govern the operation of the regulated facility including having the explicit or implicit duty of making major capital investment recommendations, and initiating and directing other comprehensive measures to assure long term environmental compliance with environmental laws and regulations; the manager can ensure that the necessary systems are established or actions taken to gather complete and accurate information or permit application requirements; and where authority to sign documentation has been assigned or delegated to the manager in accordance with corporate procedures;

*For a partnership or sole proprietorship:* by a general partner or the proprietor;

*For a Municipality, State, Federal or other public site:* by either a principal executive officer or ranking elected official.

##### **SECTION I- OVERALL EVALUATION OF BMPS AND MEASURABLE GOALS:**

One or more pages, front and back, are provided to report on the status of measurable goals which have been developed to aid in the implementation of strategies, procedures, and programs used to achieve each of the six minimum control measures in Part IV.B of the General Permit. This section provides narrative space for a descriptive explanation and evaluation of the actions taken to satisfy each of the minimum control measures for the 2020 calendar year. Please type or print. If additional space is needed, modify as necessary. Please submit attachments to the appropriate minimum control measure following the format provided.

A Permit ID # has been provided, which refers to the part of the permit where you can find a listing or description of the required measurable goal.

Please provide a general summary of actions taken (implementation of BMPs, development of procedures, events, etc.) to meet the measurable goals of the minimum measure. **Be sure to identify parties responsible for achieving each measurable goal** and reference any reliance on another entity for achieving any measurable goal. **Mark with an asterisk (\*) if this person/entity is different from last year.**

Describe whether each measurable goal was completed within the time proposed in the General Permit or your Stormwater Management Program Plan (SWMPP). Why or why not? Provide a progress report and discussion of activities that will be carried out during the next reporting cycle to satisfy the requirements of the minimum measures. If applicable, assess the appropriateness of the actions taken to meet the requirements of the minimum measure. In determining appropriateness, you may want to consider at a minimum the local population targeted, pollution sources addressed, receiving water concerns, integration with local management procedures, and available resources and violations or environmental impacts eliminated or minimized.

Also, discuss the effectiveness of the implementation of BMPs to meet the requirements of the minimum measure and the overall effectiveness of the minimum measure. Describe your progress towards achieving the overall goal of reducing the discharge of pollutants. Please include assessment parameters/indicators used to measure the success of the minimum measure. Also include a discussion of any proposed changes to BMPs or measurable goals.

After evaluation, it may be necessary to make changes or modifications to your Implementation Schedule if the time frame, appropriateness or effectiveness cannot be assured. If so, please include descriptions of changes or modifications, and detailed justification in the appropriate sections.

## **SECTION II- ADDITIONAL ANNUAL REPORT REQUIREMENTS**

Section II refers to additional reporting requirements that the General Permit requires to be submitted to the Department as part of the Annual Report. Section II requirements apply to Minimum Control Measures 2 through 6.

**Minimum Control Measure #2: Section II:**  
Specify the date of and how the annual report was public noticed. If a public meeting was needed, provide the date and place. Include a summary of public comments received

in the public comment period of the draft annual report and planned responses or changes to the program (new or revised BMP's and measurable goals, partnerships, etc.). Be sure to attach a copy of your public notice (Parts IV.G.2.h and IV.G.2.i) to the Annual Report.

**Minimum Control Measure #3: Section II.A:**  
Provide the number of illicit discharges identified in 2020, number of illicit discharges tracked in 2020, number of illicit discharges eliminated in 2020, complaints received, complaints investigated, violations issued and resolved with a summary of enforcement actions, number of unresolved violations that have been referred to RIDEM, the total number of illicit discharges identified to date, and the total number of illicit discharges remaining unresolved at the end of 2020. Include a short narrative describing the extent to which your system has been mapped (Part IV.G.2.m), and the total number of outfalls identified to date.

**Minimum Control Measure #3: Section II.B:**  
List identified MS4 interconnections, including location, date found, operator of the physically interconnected MS4, and originating source of newly identified physical interconnections with other small MS4s. Also note any planned or coordinated activities with the physically interconnected MS4 (Part IV.G.2.k and IV.G.2.l).

**Minimum Control Measures #4 & 5: Section II.A:**  
Identify the number of construction and post-construction plan and SWPPP/SESC Plan reviews completed during Year 17 (2020) and any additional information. This includes, but is not limited to a summary of the reviews, responsible parties, and types of projects reviewed.

**Minimum Control Measure #4: Section II.B:**  
Construction inspection information for erosion and sediment control should be submitted annually as stated in Part IV.G.2.n. Provide a summary of the number of site inspections conducted, inspections that have resulted in enforcement actions, violations that have been resolved and of those unresolved, referred to RIDEM.

**Minimum Control Measure #5: Section II.B:**  
Post-construction inspection information for proper installation of post-construction structural BMPs should be submitted annually as stated in Part IV.G.2.o. This should provide a summary of the number of site inspections conducted, inspections that have resulted in enforcement actions, violations that have been resolved and of those unresolved, referred to RIDEM.

**Minimum Control Measure #5: Section II.C:**  
Inspection information for proper operation and maintenance of post-construction structural BMPs should be submitted annually as stated in Part IV.G.2.p. This should provide a summary of the number of site inspections conducted, inspections that have resulted in

enforcement actions, violations that have been resolved and of those unresolved, referred to RIDEM.

**Minimum Control Measure #6: Section II.A:**  
As prescribed in Part IV.B.6.b.1.i of the General Permit, the MS4 operator must identify and list the specific location and description of all structural BMPs in the SWMPP at the time of application and update the information in the annual report.

**Minimum Control Measure #6: Section II.B:**  
Part IV.B.6.b.1.v of the General Permit states to identify and report annually, as part of the annual report, known discharges causing scouring at outfall pipes or outfalls with excessive sedimentation. Include Outfall ID #, location, description of the problem, any remediation taken, and the ultimate receiving water body.

**Minimum Control Measure #6: Section II.C:**  
As noted in Part IV.G.2.j of the General Permit, specify any planned municipal construction projects or opportunities to include water quality BMPs, low impact development, or seek to promote infiltration and recharge.

**Minimum Control Measure #6: Section II.D:**  
Please include a summary of results of any other information that has been collected and analyzed. This includes any type of data, including, but not limited to, dry weather survey data (Part IV.G.2.e).

### **TOTAL MAXIMUM DAILY LOAD (TMDL) or other Water Quality Determination REQUIREMENTS**

**Section I:**  
Complete this section only if your MS4 is subject to an approved TMDL. TMDL requirements may require the implementation of the six minimum control measures to address the pollutants of concern, and/or additional structural stormwater controls or measures that are necessary to meet the provisions of the approved TMDL. Be sure to identify the approved TMDL and assess the progress towards meeting the requirements for the control of stormwater (Part IV.G.2.d).

Provide a progress report on the present status and discussion of activities that have been accomplished or will be carried out during the next reporting cycle to satisfy the requirements of the TMDL. If applicable, assess the appropriateness of the BMPs selected under each of the six minimum control measures to meet the requirements of the TMDL. In determining appropriateness, you may want to consider violations or environmental impacts eliminated or minimized.

Please include assessment parameters/indicators that will be used to measure the success of the selected BMPs. Also include a discussion of any proposed changes to BMPs or measurable goals.

### **SPECIAL RESOURCE PROTECTION WATERS (SRPWs)**

**Section I:**  
Complete this section only if your MS4, located outside Urbanized Areas or Densely Populated Areas, discharges to:  
a SRPW as listed in Appendix D of the *RIDEM Water Quality Regulations* at this link:

<http://www.dem.ri.gov/pubs/regs/regs/water/h20q09a.pdf>  
or

an impaired water body including water bodies with no approved TMDL as listed in Appendix G of the *2008 Integrated Water Quality Monitoring and Assessment Report* at this link:

<http://www.dem.ri.gov/programs/benviron/water/quality/pdf/iwqmon08.pdf>.

In accordance with Rule 31(a)(5)(i)G in the *Regulations for the Rhode Island Pollutant Discharge Elimination System* (RIPDES Regulations), MS4s were required to incorporate any discharges to these water bodies into their MS4 Program on or after March 10, 2008 unless a waiver has been granted in accordance with Rule 31(g)(5)(iii).

Provide a progress report on the present status and discussion of activities that have been accomplished or will be carried out during the next reporting cycle to incorporate these areas into the MS4's Phase II Stormwater Program.