RHODE ISLAND DEPARTMENT OF
ENVIRONMENTAL MANAGEMENT
Office of Water Resources

DEM USE ONLY

Date Received _____

RIPDES SMALL MS4 ANNUAL REPORT

GENERAL INFORMATION PAGE

RIPDES PERMIT #RIR040 _____

REPORTING PERIOD: ☒ **YEAR 14**
Jan 2017-Dec 2017

OPERATOR OF MS4

Name: City of Providence			
Mailing Address: 25 Dorrance Street			
City: Providence	State: RI	Zip: 02903	Phone: (401)
Contact Person: William C. Bombard, P.E.	Title: Chief Engineer		
	Email: wbombard@providenceri.gov		
Legal status (circle one): PRI - Private (PUB - Public) 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 _____

Print Title _____

Signature _____ Date _____

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: 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.

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. There are many independent events/activities, which incorporate stormwater education, including:

- The Providence Parks Department hosted two Stormwater tours around Roger Williams Park, showcasing green infrastructure and water quality improvement efforts. This event was sponsored by the Rhode Island Foundation and The Roger Williams Park Conservancy.
- The Office of Sustainability hosted stormwater presentations for local associations and universities.
- The Sustainability Department maintains an active e-newsletter on stormwater management and pollution prevention, which is sent to approximately 300 community members.
- The Parks Department hosted a stormwater training for local colleges and universities in conjunction with the Green Infrastructure Coalition.
- The City is working with community partners, such as the Green Infrastructure Coalition, to educate on reducing stormwater pollution, including implementing demonstration projects in the neighborhoods and public events.
- Roger Williams Park added informational signs regarding stormwater green infrastructure and the impact of feeding the waterfowl near around the park, some of which are even permeable.
- The Rhode Island Green Infrastructure Coalition collaborated with William D'abate Elementary School to have the students build a rain garden at their school.
- Save The Bay partnered with 360 High School and the students marked 12 storm drains that drain directly to the bay.
- The Parks Department had three shoreline planting events with the Wheeler School, Save the Bay and Park View Middle School.
- The Department of Public Works employed an intern to research and document private BMP's within Providence. The spreadsheet includes the type of BMP and the recommended maintenance.
- The green infrastructure retrofit at Riverside Park includes informational interpretive signs.

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.

There has been no formal public education program in the reporting year.

The City works with neighborhood groups and environmental groups to supply tools and collect trash during neighborhood cleanup events.

A key partner in the Mashapaug Pond area is the Urban Ponds Procession Arts (UPP Arts). The City is a partner in their annual event, the Urban Ponds Procession. The City also hosted their exhibit, "Artists, Environmentalists, Activists" in City Hall from Nov. 28 2016 – Feb. 12 2017 to bring attention to the need and efforts to clean up Mashapaug Pond. http://www.upparts.org/

The City also works closely with the Woonasquatucket River Watershed Council (WRWC) in their efforts to implement green infrastructure, education residents, and clean up the river. For example, in 2017, with support of the City, the WRWC completed a homeowner retrofit and educational project along the Pleasant Valley Steam. The project will continue into 2018 where the Parks Department will help the WRWC install five tree box filter bioretention systems. http://www.wrwc.org/documents/2016_PleasantValleyWaterDiversion.pdf

Check all topics that were included in the Public Education and Outreach program during this reporting period. For each of the topics selected, provide the target pollutant (e.g. construction sites, total suspended solids):

Topic	**Target Pollutant(s)**
☐ Construction Sites	
☐ Pesticide and Fertilizer Application	
☐ General Stormwater Management Information	
☒ Pet Waste Management	Pet waste signs and waste collection bags are provided at various city parks. Target Pollutant: Fecal Coliform
☒ Household Hazardous Waste Disposal	The City participates in hosting Eco-Depot events at the Department of Public Works. This event is advertised on the City's social media. Target Pollutants: Floatables, hazardous materials
☒ Recycling	The DPW Environmental Division has expanded its recycling enforcement compliance area fivefold. There are now 5 active routes with expectations to have nearly all 35 routes active by Winter 2018. All City residents were mailed a multilingual informational brochure on recycling compliance. Target Pollutant: Floatables
☐ Illicit Discharge Detection and Elimination	
☐ Riparian Corridor Protection/Restoration	
☒ Infrastructure Maintenance	The DPW works to clean catch basins and sweep streets throughout the City. Target Pollutants: Sediment, floatables
☒ Trash Management	The DPW Environmental Division has expanded its recycling enforcement compliance area fivefold. This is an ongoing effort to reduce contaminated recycling loads, which are then diverted to the landfill. If non-compliant, the load is rejected at the curb, with multilingual informational literature left at the dwelling. The City also maintains sidewalk trash containers in high pedestrian areas. Target Pollutant: Floatables
☐ Smart Growth	
☐ Vehicle Washing	
☒ Storm Drain Marking	Save The Bay partnered with 360 High School and the students marked 12 storm drains around their school.
☐ Water Conservation	
☒ Green Infrastructure/Better Site Design/LID	DPW has been working with community groups on planning the installation of Green Infrastructure (GI). Target Pollutant: All Pollutants
☐ Wetland Protection	
☐ Other:	
☐ None	

Specific audiences targeted during this reporting period:

- ☐ Public Employees
- ☒ Residential
- ☐ Businesses
- ☐ Restaurants
- ☒ Other: Dog Owner
- ☐ Contractors
- ☐ Developers
- ☒ General Public
- ☐ Industries
- ☐ Agricultural

Additional Measurable Goals and Activities

Please list all stormwater training attended by your staff during the 2017 calendar year and list the name(s) and municipal position of all staff who attended the training.

Trainings:
- 2017 Fall Field Day of the Soils and Water Conservation Society – Bill Bombard, City Engineer; Bill Randall, Sewer Superintendent
- Operating & Financing your Stormwater Program Under "Real World" Conditions – Bill Bombard, City Engineer
- ArcGIS Training – Francisco Ramirez, Assoc. Director of Environmental Control; Dalila Ramirez, Environmental Specialist; Ivan Monzon-Natareno, Data Integration Programmer; Edwin Sanchez, Supervisor of Project Planning; Dino Larson, Energy Manager; Megan Gardner, Landscape Architect; Roger Choiniere, Recovery Coordinator; Patrick Fitzgerald, Preparedness Coordinator; Hamid Akinfolarin, Civil Engineer; Justin Mateus, Civil Engineer; Michael McKenna, Deputy Highway Superintendent; Bill Randall, Sewer Superintendent; Nate Urso, Traffic Engineer; John Skorupski, Engineering Aide
- Unilock Permeable Pavers – Craig Hochman, Deputy City Engineer; Justin Mateus, Civil Engineer; Hamid Akinfolarin, Civil Engineer, Steve Zisiades, Assoc. Engineer; John Skorupski, Engineering Aide
- RIDOT Vortech Swirl Chamber O&M – Justin Mateus, Civil Engineer
- URI Cooperative Extension Green infrastructure Training – David Everett, Principal Planner
- Providence Parks' Stormwater Maintenance Training – Brian Byrnes, Superintendent, Leah Bamberger; Director of Sustainability

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: 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.

The City has not implemented a formal program for the public involvement measure. The Department of Public Works, Parks Department and the Office of Sustainability share responsibility for implementing the public involvement and participation measure. There are many independent events/activities, which incorporate stormwater education, including:

- Roger Williams park added informational signs regarding stormwater green infrastructure and the impact of feeding the waterfowl near around the park.
- The Rhode Island Green Infrastructure Coalition collaborated with William D'abate Elementary School to have the students build a rain garden at their school.
- Save The Bay partnered with 360 High School and the students marked 12 storm drains that drain directly to the bay.
- The Department of Public Works employed an intern to research and document private BMP's within Providence. The spreadsheet includes the type of BMP and the recommended maintenance.
- 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 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 Providence Parks Department, Forestry Division has planted 701 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 7,152 sf of impervious sidewalk removal. https://www.providenceri.com/parks-and-rec/forestry/street-tree-planting

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:

- ☒ Cleanup Events
- ☐ Comments on SWMPP Received
- ☐ Community Hotlines
- ☐ Community Meetings
- ☐ Other (describe)
- ☒ Storm Drain Markings
- ☐ Stakeholder Meetings
- ☒ Volunteer Monitoring
- ☒ Plantings

Additional Measurable Goals and Activities

Groundwork Rhode island installed 18 tree pits on Dexter St and Linwood Ave, 8 of which include curb cuts.

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? ☒ YES ☐ NO	If YES, Date of Public Notice: February 28, 2018
How was public notified: ☐ List-Serve (Enter # of names in List: _____) ☐ TV/Radio Notices ☒ Website Enter Web Page URL: http://www.providenceri.gov/	☐ Newspaper Advertising ☒ Town Hall posting ☐ Other:
Was public meeting held? ☐ YES ☒ NO Date:	Where:
Summary of public comments received:	
Planned responses or changes to the program:	

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

Phone: 401.680.7535 **Email:** wbombard@providenceri.gov

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.) **Number of Outfalls Mapped within regulated area:** 175 **Percent Complete:** 100% **If 100% Complete, Provide Date of Completion:** Initially completed in November 2007, revised in 2016 with new outfall constructed by Narragansett Bay Commission Sewer Separation Project

All known outfalls have been mapped using GIS software including outfall attributes.

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 2017 calendar year.

The City did not implement the tagging of outfalls in the 2017 reporting year.

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.

A system has not been implemented to record additional system elements. In 2014, the City commissioned a GIS digitization of all sewer lines in the City. The City started the process of preparing an RFP in December 2016 to build on the 2014 project by completing the pipe mapping and identifying the extent of the MS4 regulated area. Included in the RFP was a task to record and report maintenance and features of additional elements. This project was awarded early in the reporting year and is currently an ongoing effort.

The program has not been effective in minimizing water quality impacts. The Department of Public Works and Parks Department are responsible for this measure.

IV.B.3.b.4	Indicate if the IDDE ordinance was **not** 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. **Date of Adoption:** 12/8/05 (Illicit Discharge Detection and Elimination – No. 569) If the Ordinance was amended in 2017, please indicate why changes were necessary.

The IDDE ordinance was amended in September of the reporting year to increase the prioritization of dry weather outfall surveys.

IV.B.3.b.5.ii, iii, iv, & v	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.
The City utilizes 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. Such requests are received by the Department of Public Works, Mayor's Center for City Services, and the City Council Office. Also, reports of illicit discharge may be reported directly to the DPW – Engineering Division for investigation. The Department of Public Works, Engineering and Sewer Divisions are responsible for tracing the illicit discharge. The DPW, Engineering Division is responsible for enforcing the removal of the illicit discharge. Public Works has retained a consultant to identify illicit discharge. No illicit discharges were reported in 2017.	
IV.B.3.b.5.vi	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. **Number of Catch Basins and Manholes Inspected for illicit connections/IDDE:** 1666 catch basins, citywide including MS4 and combined system **Percent Complete:** ~14% **Date of Completion:** 12/31/17
The City has an informal program of inspection for manholes and catch basins. As structures are cleaned, a visual inspection is performed by the operator. If anything out of the ordinary is observed, it is sent to the DPW Engineering Division for investigation and follow-up. This is an effective program for the catch basins surveyed, however, there are many thousands not surveyed in a given reporting year, therefore the goal of inspecting all catch basins and manholes was not accomplished. The City has approximately 16,000 catch basins and gutter inlets, some connected to the combined sewer system. The DPW Sewer Division is responsible for the implementation of this requirement. The Sewer Department procured a pole camera and a push camera to aid in the investigation of the structures and pipes as complaints are received.	
IV.B.3.b.5.vii	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. **The results of the dry weather survey investigations must 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.** **Number of Outfalls Surveyed Jan-Apr:** 0 **Number of Outfalls Surveyed Jul-Oct:** 0 **Percent Complete:** 0% **Date of Completion:** N/A
Outfalls were not surveyed in the reporting year. Dry weather outfall surveys are scheduled to resume in early 2018.	
IV.B.3.b.7	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.
There has been no coordination on illicit discharges. The City has not tracked illicit discharges in the reporting year. The Department of Public Works Engineering Division is responsible for this measure.	
IV.B.3.b.8	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.

No actions have been taken for the referral to RIDEM of non-stormwater discharges as outfalls have not been investigated and no illicit discharges have been discovered. The program is ineffective as the DPW has not discovered or traced illicit discharges. The Department of Public Works is responsible for implementing this measure.	
IV.B.3.b.9	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.
No formal efforts have been taken to inform public employees, businesses and the general public of hazards associated with illegal discharges, etc. Implementing this requirement has not been effective.	
Additional Measurable Goals and Activities No additional measurable goals or activities.	

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

# of Illicit Discharges Identified in 2017: 0	# of Illicit Discharges Tracked in 2017: 0
# of Illicit Discharges Eliminated in 2017: 0	# of Complaints Received: 0
# of Complaints Investigated: 0	# of Violations Issued: 0
# of Violations Resolved: 0	# of Unresolved Violations Referred to RIDEM: 0
Total # of Illicit Discharges Identified to Date (since 2003): 0	Total # of Illicit Discharges remaining unresolved at the end of 2017: 0
Summary of Enforcement Actions: No enforcement actions have been taken as illicit discharges have not been traced.	
Extent to which the MS4 system has been mapped: Outfalls have been located and mapped in GIS. The storm sewers have been mapped in GIS with pipe diameter, to the extent of the information currently available. The City recently awarded an RFP to map and identify the regulated MS4 area, update existing information and include associated features (catch basins, manholes, etc). Paper records, plans and as-builts are fairly extensive and accurate.	

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:

MINIMUM CONTROL MEASURE #4:
CONSTRUCTION SITE STORMWATER RUNOFF CONTROL
(Part IV.B.4 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. 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: William C. Bombard, P.E, City Engineer

Phone: 401.680.7535 **Email:** wbombard@providenceri.gov

IV.B.4.b.1	Indicate if the Sediment and Erosion Control and Control of Other Wastes at Construction Sites ordinance was **not** 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. **Date of Adoption:** 12/08/05 (Soil Erosion and Sediment Control – No. 568) If the Ordinance was amended in 2017, please indicate why changes were necessary. 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.

Amendments have not been made based on the 2010 RI Stormwater Design and Installation Standards Manual.

IV.B.4.b.6	Use the space below to describe actions taken as a result of receipt and consideration of information submitted by the public.

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. The City also accepts and investigates complaints received via mail or phone.

The Department of Public Works is responsible for responding to considerations and complaints. This measure is effective as response times range from 12-72 hours.

IV.B.4.b.8	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.

All site plans undergo a pre-construction review. The Department of Public Works – Engineering Division, Department of Inspection and Standards – Building Official are responsible for this goal.

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 to submit reports certifying compliance with submitted plans and specifications outlined in RIGL 23-27.3 Section 128.0 of the RI Building Code.

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.

Additional Measurable Goals and Activities

Public comment and information regarding new development projects and construction runoff related impacts are available at the Department of Inspections and Standards upon request.

SECTION II. A - Plan and SWPPP/SESC Plan Reviews during Year 14 (2017), 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: 4 # of Construction Reviews Completed: 4 # of Permits/Authorizations Issued: 4
Summary of Reviews and Findings, include an evaluation of the effectiveness of the program. The City's ordinance requires developments of 20,000 SF or greater to submit a SWPPP. The figures above reflect the City's minimum threshold of 20,000SF and are located Citywide (not exclusive to the MS4 regulated area). Identify person(s) /Department and/or parties responsible for the implementation of this requirement: The Building Official and City Engineer are responsible for this minimum measure.

SECTION II.B - Erosion and Sediment Control Inspections during Year 14 (2017), 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).

# of Active Construction Projects: Not tracked	
# of Site Inspections: 0	# of Complaints Received: Not Tracked
# 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 City does not perform inspections for erosion and sediment control on private sites. The Department of Inspections and Standards requires the submittal of a RIDOA form 128 by the engineer/architect of record, requiring reports certifying compliance with submitted plans and specifications. The Chief Engineer reviews all plans, stormwater calculations and erosion control methods prior to sending it to the Building Official. Identify person(s) /Department and/or parties responsible for the implementation of this requirement: The Building Official is responsible for the implementation of this requirement.	

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: 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.

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.

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).

In the reporting year, there were 5 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 **not** 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. **Date of Adoption:** 12/08/05 (Post Construction – Storm Water Control – No. 567) If the Ordinance was amended in 2017, please indicate why changes were necessary. 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.

The City has prepared a draft for a Post-Construction Stormwater Management Ordinance.

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.

All municipal owned BMP's are known and listed in under **Minimum Measure #6**, **SECTION II.A - Structural BMPs (Part IV.B.6.b.1.i)**, but are not distinguished by MS4 or combined sewer system watersheds**.**

Groundworks Rhode Island installed 10 tree wells and 8 curb cut tree wells on Dexter Street and Linwood Street in the reporting year.

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 Department at DPW. 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.

SECTION II.A. - Plan and SWPPP/SESC Plan Reviews during Year 14 (2017), 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).

# of Post-Construction Applications Received: 0 # of Post-Construction Reviews Completed: Not Tracked # of Permits/Authorizations Issued: Not Tracked
Summary of Reviews and Findings, include an evaluation of the effectiveness of the program. Post construction stormwater management inspections do not occur, however all construction projects are subject to pre-construction plan review. 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. Identify person(s) /Department and/or parties responsible for the implementation of this requirement: The Department of Public Works is responsible for implementing this requirement.

SECTION II.B. - Post Construction Inspections during Year 14 (2017), 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).

# of Active Construction Projects: Not Tracked	# of Construction Projects Completed: Not Tracked
# of Site Inspections for proper Installation of BMPs: 0	# of Complaints Received: Not Tracked
# of Violations Issued: Not Tracked	# of Unresolved Violations Referred to RIDEM: Not Tracked
Summary of Enforcement Actions: The City does not perform inspections of structural BMP installation. The Department of Inspections and Standards requires the submittal of a RIDOA form 128 by the engineer/architect of record, requiring reports certifying compliance with submitted plans and specifications. 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.	

SECTION II.C. - Post Construction Inspections during Year 14 (2017), 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: Not Tracked
# of Violations Issued: Not Tracked	# of Unresolved Violations Referred to RIDEM: Not Tracked
Summary of Activities and Enforcement Actions. Evaluate the effectiveness of the Program in minimizing water quality impacts. Post construction inspections for proper operation and maintenance of structural BMPs are not performed by the City. O&M of structural BMP's is not tracked in the reporting year but are planned to tracked in 2018. 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.	

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 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 are responsible for approving submissions.

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:

_____

_____

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	☒ YES ☐ NO
b.	A description of the permanent stormwater BMPs that will be operated and maintained	☒ YES ☐ NO
c.	The location of the permanent stormwater BMPs that will be operated and maintained	☒ YES ☐ NO
d.	A timeframe for routine and emergency inspections and maintenance of all permanent stormwater management BMPs	☒ YES ☐ NO
e.	A requirement that all inspections and maintenance activities are documented	☒ YES ☐ NO
f.	Annual submission of inspection/maintenance certification/documentation to the MS4	☒ YES ☐ 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	☐ YES ☒ NO
h.	Steps available for addressing a failure to maintain the stormwater controls and BMPs	☐ YES ☒ NO

Please elaborate, if appropriate:

_____

_____

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

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

a.	Agreements and arrangements to ensure O&M of BMPs?	☐ YES ☒ NO
b.	Inspections?	☒ YES ☐ NO
c.	Maintenance and schedules?	☐ YES ☒ NO
d.	Complaints?	☐ YES ☒ NO
e.	Non-Compliance?	☐ YES ☒ NO
f.	Enforcement actions?	☐ YES ☒ 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:
A GIS Shapefile has been developed in the reporting year and will be maintained by the Department of Public Works – Engineering Division.

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:

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

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.

(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: William C. Bombard, P.E, City Engineer

Phone: 401.680.7535 **Email:** wbombard@providenceri.gov

IV.B.6.b.1.i	Use the space below to describe activities and actions taken to identify structural BMPs 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. **Do you have an inventory of MS4-owned/operated BMPs?** ☒ YES ☐ NO **Total # of MS4-owned/operated BMPs** (does not include CBs or MHs): 19
Structural BMPs owned and maintained by the City are known and listed in Section II.A. As new BMPs are introduced, the list is updated. The SWMPP was revised in 2017 to identify watersheds with TMDLs for total phosphorus and/or bacteria, and will be updated regularly starting in 2018.	
IV.B.6.b.1.ii	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. **# of MS4-owned/operated BMPs inspected in 2017**: 9 **# of MS4-owned/operated BMPs maintained/cleaned in 2017**: 9 **# of MS4-owned/operated BMPs repaired in 2017**: 0 Does your municipality/MS4 have a system for tracking: a. Inspection schedules of MS4-owned BMPs? ☐ YES ☒ NO b. Maintenance/cleaning schedules of MS4-owned BMPs? ☐ YES ☒ NO c. Repairs, corrective actions needed? ☐ YES ☒ NO d. Complaints? ☒ YES ☐ NO Do you use an electronic tool (e.g. GIS, database, spreadsheet) to track stormwater BMPs, inspections, and maintenance? ☐ YES ☒ NO
Most BMP's are maintained by hand or machinery. The York Pond sediment forebay requires a crane to excavate the accumulated sediment. The Parks Department is currently working on tracking BMPs through an electronic tool called GreenCity.	

IV.B.6.b.1.iii	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. **Total # of CBs within regulated area (including SRPW and TMDL areas):** Unknown, estimated to be 12,000 Citywide including combined system. Numbers below are for MS4 and combined sewer system. **# of CBs inspected in 2017:** 1666 **% of Total inspected:** ~14% **# of CBs cleaned in 2017:** 1666 **% of Total cleaned:** ~14% Quantity of sand/debris collected by cleaning of catch basins: 883.16 tons Location used for the disposal of debris: Rhode Island Resource Recovery Corporation Do you use an electronic tool (e.g. GIS, database, spreadsheet) to track the inspections and cleaning of catch basins? ☐ YES ☒ NO

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.

Currently, the sewer systems which the catch basins connect to are not distinguished between MS4 and the combined sewer system. The numbers above are representative of both the MS4 and the combined system This measure is ineffective.

A new GIS based asset management will be introduced in 2018 to begin recording maintenance activities.

IV.B.6.b.1.iv	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

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.

There is one area of erosion on Irving Avenue and River Road that the City has attempted to stabilize. After a RIDOT resurfacing project, the curb reveal was eliminated, forcing runoff onto the sidewalk and grassed areas. Until a more permanent solution can be identified, the areas of erosion have been filled with asphalt. This area has been identified for a green infrastructure retrofit in Fiscal Year 2018.

IV.B.6.b.1.v	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.

There are no known discharges causing scouring at outfall pipes after two dry weather surveys performed in 2007.

Excessive sedimentation is found at the forebay at York Pond. The watershed is approximately 1.75 sq. miles and has many hills, requiring substantial sand during snow/ice events. The forebay is cleaned to the extent possible, as needed. This is the responsibility of the DPW Parks Department.

This is ineffective, as the last outfall survey was completed in 2007.

IV.B.6.b.1.vi	Use the space below to indicate if all streets and roads within the urbanized area were swept annually and if not indicate reason(s). Evaluate appropriateness and effectiveness of this requirement. **Total roadway miles within regulated area (including SRPW and TMDL areas):** ~405 miles of total city roadways. Regulated miles have not been determined. **Roadway miles that were swept in 2017:** 3190 lane miles **% of Total swept:** not Tracked. Total roadway miles include roads that have been swept repeatedly. Type of sweeper used: ☒ Rotary brush street sweeper ☒ Vacuum street sweeper Quantity of sand/debris collected by sweeping of streets and roads: 577.06 ton, Citywide Location used for the disposal of debris: Rhode Island Resource Recovery Corp. Do you use an electronic tool (e.g. GIS, database, spreadsheet) to track the annual sweeping of streets and roads? ☒ YES ☐ NO

All streets in the City are swept at least twice per year. Primary streets and high traffic areas are swept several more times each year. The street sweeping mileage is recorded each day, but is represented as lane miles swept. The daily sweeping logs that the operators complete record lane miles swept and locations swept by Ward and street. This data is entered into an Excel spreadsheet to track number sweepers employed, as well as roads and lane miles swept, each day. The street sweeping figures are Citywide; including streets within the MS4 regulated area and the combined sewer area.

Tracking mileage by MS4, SRPW and TMDL areas does not occur, and is therefore ineffective. The City has been working to issue an RFP to determine the regulated MS4. As part of the RFP, the regulated area will be mapped and a system to track street sweeping activities will be developed in the near future.

The City owns and operates rotary brush street sweepers and contracts vacuum street sweepers.

IV.B.6.b.1.vii	Use the space below to describe activities and actions taken for controls to reduce floatables and other pollutants from the MS4. Evaluate appropriateness and effectiveness of this requirement.

The City and the Downtown Improvement District post and maintain trash barrels in major pedestrian areas. Trash pickups are made daily or weekly depending on the volume.

This is an effective measure in the areas served.

IV.B.6.b.1.viii	Use the space below to describe the method for disposal of waste removed from MS4s and waste from other municipal operations, including accumulated sediments, floatables and other debris and methods for record-keeping and tracking of this information. Do you have a system for tracking actions to remove and dispose of waste? ☒ YES ☐ NO

Sediment excavated from catch basins and street sweeping are disposed of at the Rhode Island Resource Recovery Corporation (RIRRC). Tonnage slips are collected and maintained by the DPW. Also, RIRRC issues statements with monthly tipping totals by category.

The City maintains trash collection facilities in major pedestrian areas throughout the City which helps minimize floatables in the MS4, although quantities are not recorded as citywide trash is mixed at the transfer station.

IV.B.6.b.4 and IV.B.6.b.5	Use the space below to describe and indicate activities and corrective actions for the evaluation of compliance. This evaluation must include visual quarterly monitoring; routine visual inspections of designated equipment, processes, and material handling areas for evidence of, or the potential for, pollutants entering the drainage system or point source discharges to a waters of the State; and inspection of the entire facility at least once a year for evidence of pollution, evaluation of BMPs that have been implemented, and inspection of equipment. A Compliance Evaluation report summarizing the scope of the inspection, personnel making the inspection, major observations related to the implementation of the Stormwater Management Plan (formerly known as a Stormwater Pollution Prevention Plan), and any actions taken to amend the Plan must be kept for record-keeping purposes.

The City of Providence Department of Public Works facility has floor drains and catch basins which drain to the combined sewer system and, therefore, do not pose a threat to any waters of the state. Regardless, the DPW is ever diligent in maintaining a "clean house." Efforts have been made to eliminate bulk storage of chemicals needed for the operation of this department. Sand used for winter operations is stored indoors.

No formal inspection or reports have been issued.

IV.B.6.b.6	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. How many stormwater management trainings have been provided to *municipal employees* during this reporting period? 1 What was the date of the last training? October 10, 2017 How many *municipal employees* have been trained in this reporting period? 2 What percent of *municipal employees* in relevant positions and departments received stormwater management training? Not Tracked
The Parks Department, in conjunction with the Green Infrastructure Coalition, hosted a stormwater training for state and municipal employees at Roger Williams Park. The Parks Department developed a stormwater maintenance program with the Green Infrastructure Coalition and the Rhode Island Nursery and Landscape Association that trains and educates municipal employees and homeowners on green infrastructure, the impacts on stormwater and how to maintain the infrastructure.	
IV.B.6.b.7	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.
The City continues to asses 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. The City Engineer is responsible for this action.	
Additional Measurable Goals and Activities The Parks Department continues to coddle Canadian Geese eggs in association with the US Fish & 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.	

SECTION II.A - Structural BMPs (Part IV.B.6.b.1.i)

BMP ID:	Location:	Name of BMP Owner/Operator:	Description of BMP:	Frequency of Inspection:
Fountain/Dorrance/ Eddy Intersection	71°24'52.12"W, 41°49'29.03"N	Owned by City of Providence. Operator TBD	Vegetated Rain Garden	Not inspected
Mashapaug/JT Owens Park	71°26'13.78"W, 41°47'32.71"N	Providence Parks Department	Vegetated Infiltration Basin	3 times per year
RWP Site 1G – Shoreline Boathouse	71°24'51.08"W, 41°46'59.92"N	Providence Parks Department	Vegetated Buffer	3 times per year
RWP Site 3B – Carousel Parking Lot	71°24'51.08"W, 41°46'59.92"N	Providence Parks Department	Bioretention Area	3 times per year
RWP Site 6 – Roosevelt Pond	71°24'59.46"W, 41°46'56.55"N	Providence Parks Department	Bioretention Area	3 times per year
RWP Site 12 – Lover's Retreat 1	71°25'00.1"W, 41°47'01.1"N	Providence Parks Department	Bioswale	3 times per year
RWP Site 12 – Lover's Retreat 2	71°25'00.1"W, 41°47'01.1"N	Providence Parks Department	Rain Garden	3 times per year

RWP Site 17/18 – Polo Lake	71°24'55.85"W, 41°47'18.02"N	Providence Parks Department	Bioretention Area	3 times per year
RWP Site 24 – Cunliff pond	71°24'51.58"W, 41°46'42.65"N	Providence Parks Department	Bioretention Area	3 times per year
RWP Site 28 – Elm Lake at Edgewood Blvd	71°24'27.58"W, 41°46'43.80"N	Providence Parks Department	Bioretention Area	3 times per year
York01	71°22'49.08"W, 41°50'06.16"N	Providence DPW	Energy Dissipater/Sediment Forebay	3 times per year
Dexter Tree Box Curb Cut 1	71°25'46.7"W, 41°48'18.4"N	Owned by City of providence. Operated by Groundworks Rhode Island	Curb Cut Tree Pit	2 times per year
Dexter Tree Box Curb Cut 2	71°25'46.5"W, 41°48'18.8"N	Owned by City of providence. Operated by Groundworks Rhode Island	Curb Cut Tree Pit	2 times per year
Dexter Tree Box Curb Cut 3	71°25'46.3"W, 41°48'19.5"N	Owned by City of providence. Operated by Groundworks Rhode Island	Curb Cut Tree Pit	2 times per year
Dexter Tree Box Curb Cut 4	71°25'46.1"W, 41°48'19.9"N	Owned by City of providence. Operated by Groundworks Rhode Island	Curb Cut Tree Pit	2 times per year
Dexter Tree Box Curb Cut 5	71°25'45.8"W, 41°48'20.4"N	Owned by City of providence. Operated by Groundworks Rhode Island	Curb Cut Tree Pit	2 times per year
Linwood Tree Box Curb Cut 1	71°25'47.5"W, 41°48'19.4"N	Owned by City of providence. Operated by Groundworks Rhode Island	Curb Cut Tree Pit	2 times per year
Linwood Tree Box Curb Cut 2	71°25'48.0"W, 41°48'20.0"N	Owned by City of providence. Operated by Groundworks Rhode Island	Curb Cut Tree Pit	2 times per year
Linwood Treet Box Curb Cut 3	71°25'48.6"W, 41°48'19.7"N	Owned by City of providence. Operated by Groundworks Rhode Island	Curb Cut Tree Pit	2 times per year

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:

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 Woonasquatucket River Watershed Council is working with the Providence parks Department to treat direct stormwater inputs to the Pleasant Valley Stream by installing five tree box filter bioretention systems with attached catch basins in strategic locations throughout the parkland. Also a part of this project is:

- Pilot Residential Downspout Disconnection - 3 properties will be selected for disconnection and infiltration)
- Public Education and Outreach – Pet Waste control and buffer planting

The Planning Department has provided support for the Irving Ave/River Road/Seekonk River redesign, including proposed green infrastructure and drainage improvements.

The Planning Department assisted the Harbor Management Commission in drafting the Harbor Management Plan. The plan includes recommendations relating to improved stormwater management.

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).

The City of Providence continues to participate in the Upper Narragansett Bay Regional Stormwater Management District. Phase II has been completed, with Phase III to start when funding is available.

The City of Providence has finalized and executed a consent agreement with the Rhode Island Department of Environmental Management regarding its MS4 permit.

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.

It is unknown whether the City of Providence has received notification to require non-structural or structural stormwater controls based on approved TMDL's.

TMDL waters in Providence:
- Mashapaug Pond (Phosphorus, Dissolved Oxygen)
- Roger Williams Park Ponds (Eutrophic – Phosphorus)
- Woonasquatucket River (Fecal Coliform, Dissolved Metals)

The actions that have been taken to date to address the pollutant(s) of concern are the structural BMPs presented in the table at Section IIA.

SPECIAL RESOURCE PROTECTION WATERS (SRPWs)

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 10th to track progress of compliance. If you have questions regarding this Annual Report Form contact Margarita Chatterton of the Rhode Island Department of Environmental Management (RIDEM), Office of Water Resources, Permitting Section at (401) 222-4700 ext. 7605.

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 2017 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 2017, number of illicit discharges tracked in 2017, number of illicit discharges eliminated in 2017, 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 2017. 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 14 (2017) 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.