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 18**
Jan 2021-Dec 2021

OPERATOR OF MS4

Name: City of Providence – Department of Public Works			
Mailing Address: 700 Allens Avenue			
City: Providence	State: RI	Zip: 02905	Phone: (401)680-7515
Contact Person: Craig Hochman, P.E.	Title: Chief Engineer		
	Email: chochman@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 & Title: *Emily Koo, Interim Director of Sustainability (ekoo@providenceri.gov), *Craig Hochman, Chief Engineer (chochman@providenceri.gov), *Dave Everett, Principal Planner (deverett@providenceri.gov), *Brian Byrnes – Deputy Superintendent of Parks (bbyrnes@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.

On Earth Day of 2021, the City of Providence Office of Sustainability launched an ongoing public education campaign on pesticide and chemical reduction. Pesticide Free PVD encourages residents, property owners, and businesses to commit to eliminating the use of harmful chemicals like pesticides and fertilizers in lawns and gardens, as well as other toxins in the home. In addition to maintaining a "Stormwater Management" webpage, a Pesticide Free PVD webpage (http://sustainpvd.com/pesticidefree) consolidates information and resources for residents on potential negative health and environmental impacts, what it takes build a healthy ecosystem and reduce contaminated stormwater pollution, and other trainings, resources and best practices. Materials used for public education included a simple pledge (online and paper), 10 easy tips for residents, Pesticide Free PVD yard signs, and testimonials shared on social media. Additionally, the Office of Sustainability made 5 Facebook posts and 3 Twitter posts in the reporting year regarding stormwater.

The Planning Department and DPW facilitated site visits and planning for potential strategic green stormwater BMPs with non-profit and neighborhood groups. The city supported a successful application for SNEP stormwater technical assistance for the York Pond watershed and subsequent trainings (project ongoing, will result in design of one BMP in a prominent location with additional public education and outreach). Additionally, the city facilitated interaction with Groundwork RI in relation to implementing bioretention sites.

The Parks Departments has recently built the Stormwater Innovation Center (https://www.stormwaterinnovation.org/) 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 Stormwater Innovation Center held multiple trainings and seminars throughout the year, including field trips and classes for elementary schools in Cranston and 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.

Between the launch of the Pesticide Free PVD campaign in April 2021 and the end of the calendar year, over 100 residents pledged to go pesticide free, resulting in 500,000 square feet (~11.5 acres) of private, primarily residential, land pledged managed without pesticides. Early adopters of the Pesticide Free PVD campaign included the Parks Department, a community development corporation, a college, a property management company, and a neighborhood parks conservancy. Many residents learned about taking the pledge via public outreach at community events and by noticing the "Pesticide Free PVD" yard signs in neighborhoods. The campaign was also promoted on social media, featured on a national radio network, and advertised in local news sources. Outreach for Pesticide Free PVD will resume in the spring of 2022, with a presence at community events and a door-knocking campaign targeted at TMDL affected areas. The Audubon Society of Rhode Island was a core partner in highlighting the efforts of the Parks Department to limit exposure to chemical-heavy pesticide and fertilizer treatments and reduce stormwater pollution. Clean Water Action Rhode Island was also a core partner in the partnership to reduce neurotoxic chemicals both within city government and citywide and will lead the door-to-door outreach.

The Office of Sustainability supported and promoted several public education programs in 2021, from a virtual training on stormwater-friendly landscaping for residents (Providence Stormwater Innovation Center) to virtual and in-person rain barrel workshops (Woonasquatucket River Watershed Council) and the Rain Harvest Arts Festival. The SustainPVD Fair, hosted in September of 2021, included a stormwater demo for kids and adults to identify bacteria in water samples under a microscope.

Groups including the Seekonk River Alliance and Blackstone Parks Conservancy were assisted in learning about stormwater issues and specific remedies and educational tools for the York Pond watershed and Seekonk River. This led to collaboration with Groundwork RI in selecting potential sites, development of a schematic design for a BMP, and a Southeast New England Program (SNEP) technical assistance grant for green stormwater management. This education led to a successful Narragansett Bay Estuary Program (NBEP) collaborative grant application with the groups and assistance from the Department of Planning and Development and Department of Public Works.

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.

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. The art festival included the painting of stormwater murals on catch basins and to learn about stormwater practices.

The Woonasquatucket River Greenway Extension project has incorporated significant stormwater features in design plans. Informative signs are proposed to accompany the stormwater features indicating their purpose and general information on stormwater.

The Woonasquatucket River Watershed Council (WRWC) installed the green infrastructure landscape features at the Farm Fresh development (10 Sims Ave). During the reporting year, WRWC staff led tours of the green infrastructure during Market Days, typically running 4 tours each day. Additionally, stormwater green infrastructure tours have been led through the Manton/Aleppo neighborhood. During the reporting year, 1 tour was led with local residents. The WRWC runs a bike camp for youths during the summer. A component of this camp is stormwater educations. During the reporting year, approximately 700 youths took part in the camp, mostly Providence residents.

The WRWC performs regular group cleanups (Clean Day on the Greenway) at local parks, and along the Woonasquatucket River bike path. In the reporting year, WRWC led a project to paint murals on storm drains at D 'Abate elementary school.

The city has supported Groundwork RI and WRWC in applying for grants to Narragansett Bay Estuary Program (NBEP) and Southeast New England Program (SNEP) for the design and/or installation of green infrastructure. Teaming with local non-profits is an effective tool, as they are the primary entity applying for grants in the City.

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**
X Construction Sites	Contractors, Developers	Sediment	Requirements on site plans for SESC, and to control runoff on developed site to extent practicable
X Pesticide and Fertilizer Application	Residents, Businesses, Contractors, General Public	Pesticides, fertilizers, other chemicals for lawns and gardens	Webpage, Printed materials, Web news ads and articles, community events, testimonials, social media, Radio
X General Stormwater Management Info	Residents, Neighborhood Groups	General	Direct Engagement, Sustainability Website, Stormwater Innovation Center website
X Pet Waste Management	Residents	Pet Waste/Bacteria	Signage and trash bags at Parks
X Household Hazardous Waste Disposal	Residents	Hazardous Wastes	Eco-Depot
X Recycling	Residents, Businesses	Non-Recyclable Waste	Rejecting contaminated recycling bins for pickup. Door knockers
☐ Illicit Discharge Detection and Elimination			
X Riparian Corridor Protection/Restoration			
X Infrastructure Maintenance	Residents, Neighborhood Groups	General	Direct Engagement, Street Sweeper Mapper
X Trash Management	Residents, businesses, waste haulers	Floatable	Hauler License and dumpster minimum standards. Door knockers
☐ Smart Growth			
☐ Vehicle Washing			
X Storm Drain Marking	Schools	General	Painted murals at Classical and Sophia Academy
X Water Conservation – Rain Barrel	Residents	General	Social Media
X Green Infrastructure/Better Site Design/LID	Residents, Neighborhood Groups, Engineers/Designers	General, Sediment	Direct Engagement, webinar
☐ Wetland Protection			
☐ Other:			

Additional Measurable Goals and Activities

Please list all stormwater training attended by your staff during the 2021 calendar year and list the name(s) and municipal position of all staff who attended the training.

Trainings:
Many dates in 2021: SNEP – Building Support for Sustainable Stormwater Funding Series (Craig Hochman – Chief Engineer, Martina Haggerty – Director of Projects, Alicia Lehrer – Executive Director of WRWC.

3/5/21: SNEP – Maintaining Green Stormwater Infrastructure

4/28/21: SNEP – Addressing Stormwater Management through Community-Driven Green Infrastructure Design (Craig Hochman -Chief Engineer)

5/27/21: The Nuts and Bolts of Dedicated Municipal Stormwater Funding (Craig Hochman – Chief Engineer)

10/26/21 and 10/27/21: RI Stormwater Expo – Presenter and Field Training Presentations (Craig Hochman – Chief Engineer)

Multiple Dates in 2021 and 2022: SNEP Network Stormwater Training Series (Craig Hochman – Chief Engineer, Dave Everett – Principal Planner)

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: *Emily Koo, Director of Sustainability (ekoo@providenceri.gov), *Craig Hochman, Chief Engineer (chochman@providenceri.gov), *Dave Everett, Principal Planner (deverett@providenceri.gov), *Brian Byrnes – Deputy Superintendent of Parks (bbyrnes@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 Pesticide Free PVD campaign targets residents, property owners, and businesses in the City of Providence. Pesticides, fertilizers, and other chemicals used for lawns and gardens were the targeted pollutants, with the goal of reducing exposure to neurotoxic chemicals in both public and private green spaces. The City's Office of Sustainability (Emily Koo, Interim Director of Sustainability) has led the campaign with support from Healthy Babies Bright Futures, Clean Water Action Rhode Island, the Audubon Society of RI, and others.
In 2021, the Pesticide Free PVD public education campaign yielded the following results: 100 pledges taken and 500,000 square feet of pesticide free land. While in late spring, approximately half of all pledges were on the east side (3 out of 15 wards), by the end of fall, this imbalance had shifted with 38% of pledges on the east side and 62% in the remainder of the city. In-person events and interactions helped bring broader awareness about chemical reduction and stormwater pollution throughout Providence's neighborhoods.

Residents and members of the Seekonk River Alliance and Blackstone Parks Conservancy were actively involved in site selection for bioretention under the guidance of the Planning Department and in coordination with Groundwork RI. The Planning Department received a SNEP technical assistance grant in collaboration with these groups and the Department of Public Works which included stormwater training sessions and site visits to select and design a BMP. This effort, which is ongoing, was instrumental in the non-profits receiving a NBEP grant to design an additional BMP.

The WRWC performs regular group cleanups (Clean Day on the Greenway) at local parks, and along the Woonasquatucket River bike path. In the reporting year, WRWC led a project to paint murals on storm drains at D 'Abate elementary school.

The city has supported Groundwork RI and WRWC in applying for grants to Narragansett Bay Estuary Program (NBEP) and Southeast New England Program (SNEP) for the design and/or installation of green infrastructure. Teaming with local non-profits is an effective tool, as they are the primary entity applying for grants in the City.

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

With remaining funds for the Pesticide Free PVD campaign, we intend to execute a targeted door-knocking campaign in TMDL affected areas. Information about the Stormwater Management Program Plan may be included in this additional outreach in the spring of 2022.

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: Draft Annual Report was posted to DPW website, however without public notice.
How was public notified: ☐ List-Serve (Enter # of names in List: _____) ☐ TV/Radio Notices ☒ Website ☐ Newspaper Advertising ☐ Town Hall posting ☐ Other: Enter Web Page URL: _____	
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 & Title: *Craig Hochman, Chief Engineer (chochman@providenceri.gov) , *Joe Atchue – Director of Inspections and Standards (jatchue@providenceri.gov)

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

If yes, when and where?

If no, who *is* trained on IDDE? Former employee who resigned late 2021.

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

The outfall map has not been amended since December 2020.

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 2021 calendar year.

The city did not implement the tagging of outfalls under the IDDE minimum measure in 2021 calendar 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.

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. In previous reporting years, 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. Additional efforts need to occur to further define potential sewer mains that appear to be separated, but tie into a combination sewer system downstream. Revisions are made to the system as new development occurs, errors or new information are encountered, or other historic record plans are discovered. Also, the MS4 area needs to be further defined.

The GIS system, with historic record drawings is posted to the city website for public consumption and field use by DPW crews. https://cdmsmith.maps.arcgis.com/apps/webappviewer/index.html?id=9d5b1e994a2c4630b1679446889078e1

This implementation is helpful to trace potential issues that may cause water quality impacts. In the reporting year, this program was not necessary in minimizing water quality impacts as it was not required for a specific issue.

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 2021, please indicate why changes were necessary.

No amendments were made to the IDDE ordinance during the reporting year.

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 Department of Public Works, Engineering and Sewer Divisions are responsible for tracing an illicit discharge and the Department of Public Works and Department of Inspections and Standards are responsible for removing the source of an illicit discharge.

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. 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.

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 can generate 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.

Illicit discharges may also be reported directly to the Department of Public Works, Engineering Division for further investigation.

In the reporting year, DPW procured a sewer CCTV camera to further assist in illicit discharge detection. In 2021, 1 complaint was submitted through email by RIDEM staff. A meat distributor was observed washing trucks, which drained to an MS4 catch basin. The DPW Environmental Division addressed the issue with the manager of the business.

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:** 1124 catch basins citywide, including MS4 and combined system. See appendix B for locations of catch basins cleaned in the reporting year. **Percent Complete:** 7.8% of MS4 and Combined system **Date of Completion:** 12/31/21

The measurable goal to clean and inspect all structures has not been completed due to lack of funding, equipment, and staff. The DPW – Sewer Division is responsible for cleaning and inspecting for illicit discharges.

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.). The program is also ineffective as a limited number of catch basins are visited annually and no formal program for manhole inspections exist.

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 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.** **Number of Outfalls Surveyed Jan-Apr:** 0 **Number of Outfalls Surveyed Jul-Oct:** 0 **Percent Complete:** N/A for 2021 **Date of Completion:** June 27, 2018

All 151 outfalls were inspected in 2018, from July to October due to an excessively wet spring that year. Of all the outfalls inspected, 22 were determined 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.

The Department of Public Works, Engineering Division is responsible for dry weather outfall inspections.

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 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 to isolate the discharge and follow-up for removal.

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.

In the reporting year, there were no referrals to RIDEM for non-stormwater discharges.

The City is aware of a possible illicit connection in the MS4 line connecting Mashapaug Pond to the Roger Williams Park Ponds near Dixon St. The potential connection was identified by RIDOT/Providence Parks Department, with a potential connection identified, however this has not been confirmed.

The Department of Public Works, Engineering Division 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 and has not been coordinated with the public education minimum measure. This measure is ineffective. The Sustainability, Parks, Planning and Public Works departments all have a share of responsibility for the implementation of this measure.

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.

Additional Measurable Goals and Activities

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

# of Illicit Discharges Identified in 2021:1	# of Illicit Discharges Tracked in 2021:1
# of Illicit Discharges Eliminated in 2021:0	# of Complaints Received:0
# of Complaints Investigated:1	# of Violations Issued:0
# of Violations Resolved:0	# of Unresolved Violations Referred to RIDEM:0
Total # of Illicit Discharges Identified to Date (since 2003):11	Total # of Illicit Discharges remaining unresolved at the end of 2021: 8

Summary of Enforcement Actions:

The Dixon St possible illicit connection is still under investigation. No formal enforcement actions were taken by the City in the reporting year.

Total # of Outfalls identified and mapped to date: 151

Total # of Interconnections with other MS4s identified and mapped to date: 0

Extent to which the MS4 system has been mapped (% complete): 95% est.

Identify how the following components of the MS4 system have been mapped:	Not mapped	GIS	Auto CAD	Paper	Other (please specify)
Catch basins	☐	☒	☐	☒	☐
Manholes	☐	☒	☐	☒	☐
Pipes, ditches, and other conduits	☐	☒	☐	☐	☐
Flow direction and connectivity	☐	☒	☐	☒	☐
Interconnections with other regulated MS4s	☒	☐	☐	☐	☐
MS4-owned stormwater controls (BMPs, not including catch basins or manholes)	☐	☐	☐	☒	☐
Delineation of outfall catchment/drainage areas	☒	☐	☐	☐	☐

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:

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 & Title: *Joe Atchue – Director, Department of Inspections and Standards (jatchue@providencri.gov), *Craig Hochman – Chief Engineer, Department of Public Works (chochman@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 2021, 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 ordinance was not amended in 2021, and has not been amended 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 can generate work orders and will automatically email citizens upon fulfillment of a service request.

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.

Additionally, a daytime phone number and after hours/weekend phone number has been added to the DPW Sewer website for sewer emergencies.

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 and Department of Inspection and Standards, Building Official are responsible for this goal.

The City does not perform erosion and sediment control inspections regularly. Inspections are performed in response to complaints, observed erosion outside of the site, or observed failed erosion and sediment controls.

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.

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, Planning Department and Department of Public Works upon request.

SECTION II. A - Plan and SWPPP/SESC Plan Reviews during Year 18 (2021), 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: 5 # of Construction Reviews Completed: 5 # of Permits/Authorizations Issued: 5
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 SWPPP 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. https://library.municode.com/ri/providence/codes/code_of_ordinances?nodeId=PTIICOOR_CH5BUSTAP_ARTVIISOERSECO NOTE: The City of Providence has a greater 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. Identify the type and date of training this person(s)/parties has/have received to be considered "adequately trained": No formal training for reviewing SWPPP or SESC. Experience and prior education are used to review.

SECTION II.B - Erosion and Sediment Control Inspections during Year 18 (2021), 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:118 Residential, 12 commercial	

# of Site Inspections: 20	# of Complaints Received:3
# of Violations Issued:0	# of Unresolved Violations Referred to RIDEM:0

Summary of Enforcement Actions, include an evaluation of the effectiveness of the program.
Enforcement is taken when erosion is realized by staff, or when complaints are submitted. There is not a regular program to inspect active construction sites. This reactive program is effective by leveraging current and future permits to the developer to make the necessary corrections and to clean the sediment. This applies to both the MS4 and combination sewer system. Site inspections are performed by DPW at the end of construction, only when a certificate of occupancy is required to be signed off by DPW. The amount of final site inspections performed by DPW is not known in 2021 due to staff resignations and retirements. A new tracking system has been set up for the 2022 reporting year to better capture this information.

During the reporting year, it was observed that utility capital projects were a significant cause of erosion. The DPW caused work to cease until the contractor cleaned up the sediment and installed sediment controls in catch basins and in front of curb inlets. Ability to obtain occupancy permit and future excavation permits were leveraged to achieve the erosion and sediment control. Random site visits occurred until the utilities showed compliance. This was effective in both the MS4 and combination sewer system.

New development plans (effective 11/2/21) for all new buildings require the engineer/surveyor to show the location and type of proposed sediment/erosion control devices and stockpile locations on the plans.

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: *Craig Hochman, P.E., City Engineer (chochman@providenceri.gov), Joe Atchue, Director of Inspections and Standards (jatchue@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. Developers are required to submit RIDEM stormwater permits for projects at time of plan review. Low impact development/green infrastructure is required in accordance with the Post-Construction Stormwater Ordinance. Developers are encouraged to control stormwater to the extent practicable on their site for parcels less than 20,000SF, which has seen the installation of underground infiltration chambers, rain gardens, bioswales, pervious pavement and rain barrels/infiltration basins.

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 2021, 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 ordinance has not been amended since the date of adoption.

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 Appendix C. The 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 agreement with their plans. A comprehensive list and GIS dataset of privately-owned BMP's had been developed with installations from 2005 through early 2017. This was discontinued in 2017 and needs to be revised to include installations since 2017.

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. New development plans for lots under the 20,000SF Post Construction Stormwater Management Ordinance threshold, require a statement, or demonstration that stormwater is controlled on the site to the extent possible. Some developments under the 20,000SF threshold have proposed green infrastructure or creative site grading to control runoff and reduce flows to the MS4 and combination sewer system.

SECTION II.A. - Plan and SWPPP/SESC Plan Reviews during Year 18 (2021), 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: 5 # of Post-Construction Reviews Completed: 5 # of Permits/Authorizations Issued: 5
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 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. https://library.municode.com/ri/providence/codes/code_of_ordinances?nodeId=PTIICOOR_CH5BUSTAP_ARTVIISOERSECO Identify person(s) /Department and/or parties responsible for the implementation of this requirement: Craig Hochman, City Engineer – Department of Public Works Identify the type and date of training this person(s)/parties has/have received to be considered "adequately trained": No trainings attended. Craig Hochman, Chief Engineer, is self-taught in plan review from many years of professional experience.

SECTION II.B. - Post Construction Inspections during Year 18 (2021), 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: Not Tracked	# of Construction Projects Completed: Not Tracked
# of Site Inspections for proper Installation of BMPs: Not Tracked	# of Complaints Received: 0
# of Violations Issued: 0	# of Unresolved Violations Referred to RIDEM: 0
Summary of Enforcement Actions: Currently, post-construction BMP's are not inspected by City staff. The city is considering having the engineer of record submit a certification that BMP's were constructed and are operating in accordance with the plans. 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. 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 BMP's.	

SECTION II.C. - Post Construction Inspections during Year 18 (2021), 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. Maintenance agreements dictate the owner must self-inspect and send inspection reports to the City Engineer and/or Building Official. At the time writing this report, no responses have been received by the Department of Public Works for the 2021 reporting year. This is ineffective as owners do not submit O&M reports and the City does not follow up or perform inspections.

Identify person(s) /Department and/or parties responsible for the implementation of this requirement:
Building Official – Department of Inspections and Standards

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? ☐ Yes ☒ No
If yes and it was completed in 2021, please provide a copy as an attachment to this Annual Report, if you have not already submitted it.

If no, does your community plan to complete it?

☒ Yes ☐ No
If No, why not? _____

_____

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:

These requirements are only for BMP's required on lots greater than 20,000SF in accordance with the Post-Construction Stormwater Ordinance.

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:
These requirements are only for BMP's required on lots greater than 20,000SF development or redevelopment, in accordance with the Post-Construction Stormwater Ordinance.

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:

_____

_____

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.

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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 & Title: Leo Perrotta, Director – Department of Public Works, Brian Byrnes, Deputy Superintendent – Parks Department.

IV.B.6.b.1.i	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. **Do you have an inventory of MS4-owned/operated BMPs?** ☒ YES ☐ NO **Total # of MS4-owned/operated BMPs** (does not include CBs or MHs):64
A spreadsheet is maintained with MS4 owned/operated BMPs. As projects are realized, BMPs are added to the spreadsheet. This is effective as there is good internal communication on capital projects.	
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 2021**: 54 **# of MS4-owned/operated BMPs maintained/cleaned in 2021**:54 **# of MS4-owned/operated BMPs repaired in 2021**:_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
The Parks Department maintains inspections schedules, maintenance/cleaning schedules and repairs/corrective actions needed for those BMP's within the parks. Those not maintained by the Parks Department do not have schedules and are repaired as needed and as resources allow. The BMPs managed by WRWC are inspected and maintained. BMPs with catch basin incorporated into design are cleaned as needed/requested.	

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):** 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. **# of CBs inspected in 2021:** 1124 **% of Total inspected:** 7.86% **# of CBs cleaned in 2021:** 1124 **% of Total cleaned:** 7.86% Quantity of sand/debris collected by cleaning of catch basins:302.75 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. Although only a fraction of the City's catch basins were cleaned, this measure is effective for those catch basins cleaned. In the 2021 reporting year, only 1 clamshell digger was operational.

Labor and equipment shortages don't allow for all locations to be visited, and is ineffective for those locations not visited. This prohibits 2 consecutive years of data from being realized.

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 requirement.

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 multiple times. The areas of erosion have been filled with asphalt and crushed stone. This project is highlighted as a Sample Environmental Project in the Consent Agreement and is planned for 2022 construction to depave an area, divert runoff to a series of green infrastructure, and restore the sidewalk and eroded riverbank

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.

Generally, scour is not observed at outfall pipes. In October 2021, the city did receive a complaint of scour at outfall WOON02, which drains to the Woonasquatucket River around 754 Manton Avenue. It appears that this has been occurring for some time and does not appear to be a source of heavy sedimentation.

Excessive sedimentation is observed at the forebay at York Pond. The forebay has been cleaned to the maximum extend possible in the past. This is the responsibility of the Parks Department.

In the reporting year, sand was used very sparingly during the winter weather season. DPW makes efforts to eliminate or minimally use sand during storm events.

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 2021:** 1183.10 centerline miles **% of Total swept: 99%** Type of sweeper used: ☒ Rotary brush street sweeper ☐ Vacuum street sweeper Quantity of sand/debris collected by sweeping of streets and roads: 316 tons (combination of street sweeping debris AND catch basin debris, which is combined at City yard, and transported mixed to RIRRC). Location used for the disposal of debris: RI Resource Recovery 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 have been swept in the reporting year. Primary streets and high traffic areas are swept several more times each year. The street sweeping mileage is recorded each day, and is measured as roadway centerline 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 GIS every day and can been found at the link below. 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..
https://pvdgis.maps.arcgis.com/apps/webappviewer/index.html?id=8b7115baacfa4e8f83b5141836cb73aa

A map is included in Appendix A showing the number of times a road has been swept in the reporting year.

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 and recycling barrels in major pedestrian areas. Trash pickups are made daily or weekly depending on the volume. Trash and recycling barrels are also maintained at city parks.

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.2	Use the space below to describe any operations under the MS4's legal control, including activities and facilities, that have the potential to introduce pollutants into stormwater runoff, such as pesticide/herbicide/fertilizer application, chemical and waste handling and storage, vehicle fueling, vehicle washing, vehicle maintenance, sand/salt storage, snow disposal, facilities such as public works facilities with maintenance and storage yards, waste transfer stations, municipal wastewater and water treatment facilities, and municipal parking owned and operated by the MS4. Does your MS4 have any salt piles, or piles containing salt, used for deicing? ☒ YES ☐ NO If yes: Are these piles, covered to prevent exposure to rain, snow, snowmelt and/or runoff? ☐ YES ☒ NO If yes, check the type of cover used: ☐ Weatherproof permanent structure/shelter ☐ A temporary, secured, durable, waterproof covering (e.g., tarpaulin, polyethylene, polyurethane) Are these piles located on impermeable surfaces? ☒ YES ☐ NO

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 the department. 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? 3 What was the date of the last training? 10/15/21 How many *municipal employees* have been trained in this reporting period? 5 What percent of *municipal employees* in relevant positions and departments received stormwater management training? unknown Have *municipal employees* that are responsible for inspecting or cleaning catch basins also been trained to detect and report illicit connections or non-stormwater discharges? Informally.
The Parks Department provides training regarding grass clippings and leaf cleanup to keep out of waterbodies and drainage structures. The Parks Department has also eliminated and/or drastically reduced the amount of fertilizer and pesticides in the park system.	
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) 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 List			

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:
Woon02	Behind 754 Manton Ave	Scour and pipe loss	None	Woonasquatucket River
York01	Western edge of York Pond	Sedimentation	None	York Pond

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).

Woonasquatucket River Greenway Extension.

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 will procure the Sample Environmental Project 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. Construction is anticipated in Summer/Fall 2022

The Department of Public Works sidewalk replacements will incorporate grass strips where they are predominant on the street and where abutters have grass on site that they are currently maintaining.

Groundwork Rhode Island has 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. Groundwork RI is proposing new installations in 2022.

The city approved a Green and Complete Streets Ordinance in July 2021. It is anticipated that municipal projects will incorporate water quality BMP's moving forward as a commission to oversee this work is established. A Green and Complete Street Advisory Council has been established and will act as the public input

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: *Craig Hochman, City Engineer – Department of Public Works; *Brian Byrnes, Deputy Superintendent – Parks Department

LIST OF IMPAIRED WATERS:

Impaired Water Body:	Pollutants Causing Impairments:	Has TMDL been completed?	☒ YES ☐ NO
Mashapaug Pond	Total Phosphorous and Bacteria	Has MS4 been notified of TMDL requirements?	☒ YES ☐ NO
WBID: MASH		Has MS4 developed a Scope of Work or TMDL Implementation Plan?	☒ YES ☒ NO
Impaired Water Body:	Pollutants Causing Impairments:	Has TMDL been completed?	☒ YES ☐ NO
Roger Williams Parks Pond	Total Phosphorous and Bacteria	Has MS4 been notified of TMDL requirements?	☒ YES ☐ NO
WBID: RWP		Has MS4 developed a Scope of Work or TMDL Implementation Plan?	☒ YES ☒ NO
Impaired Water Body:	Pollutants Causing Impairments:	Has TMDL been completed?	☒ YES ☐ NO
Woonasquatucket River	Bacteria	Has MS4 been notified of TMDL requirements?	☒ YES ☐ NO
WBID: WOON		Has MS4 developed a Scope of Work or TMDL Implementation Plan?	☐ YES ☒ NO
Impaired Water Body:	Pollutants Causing Impairments:	Has TMDL been completed?	☒ YES ☐ NO
West River	Bacteria	Has MS4 been notified of TMDL requirements?	☒ YES ☐ NO
WBID: WEST		Has MS4 developed a Scope of Work or TMDL Implementation Plan?	☐ YES ☒ 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:	Strategy:	Target Audience:
Bacteria in the Roger Williams Park Ponds	Install signage discouraging citizens to feed the wildlife, especially the geese.	Roger Williams Park attendees
Pesticides	Pesticide Free Pledge, Information	General Public and institutions

Has the MS4 installed stormwater BMPs or required the installation of stormwater BMPs on private property to address impairments? ☐ YES ☒ 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	Type of Stormwater Control:	Date Installed: Several installed	☐ Municipally Owned ☐ Privately Owned	Who maintains it?

TOTAL MAXIMUM DAILY LOAD (TMDL) OR OTHER WATER QUALITY DETERMINATION REQUIREMENTS cont'd

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, which may or may not be in a TMDL area.

SPECIAL RESOURCE PROTECTION WATERS (SRPWs)

SECTION I. In accordance with §1.32(A)(5)(a)(7) of the *Regulations for the Rhode Island Pollutant Discharge Elimination System* (RIPDES Regulations), 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 with §1.32(G)(5)(c). A list of SRPWs can be found in §1.28 of the *RIDEM Water Quality Regulations* at this link: Water Quality Regulations (250-RICR-150-05-1) - Rhode Island Department of State
The 2018-2020 303(d) Impaired Waters Report can be found here: iwr1820.pdf (ri.gov)

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 Jennifer Stout of the Rhode Island Department of Environmental Management (RIDEM), Office of Water Resources, Permitting Section at (401) 222-4700 ext. 2777726.

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 (as defined in Title 250 RICR-150-10-1 ("RIPDES Regulations") §§1.3 and 1.12). 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 Regulations §§1.3 and 1.12). 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 Regulations §1.12);

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 2021 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 2021, number of illicit discharges tracked in 2021, number of illicit discharges eliminated in 2021, 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 2021. 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 18 (2021) 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 §1.28 of the *RIDEM Water Quality Regulations* at this link:
Water Quality Regulations (250-RICR-150-05-1) - Rhode Island Department of State
or
an impaired water body including water bodies with no approved TMDL as listed in the *2018-2020 303(d) Impaired Waters Report* at this link: iwr1820.pdf (ri.gov)

In accordance with §1.32(A)(5)(a)(7) in the *Regulations for the Rhode Island Pollutant Discharge Elimination System* (RIPDES Regulations), MS4s were required to incorporate any discharges to these waterbodies into their MS4 Program on or after March 10, 2008 unless a waiver has been granted in accordance with §1.32(G)(5)(c).

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.