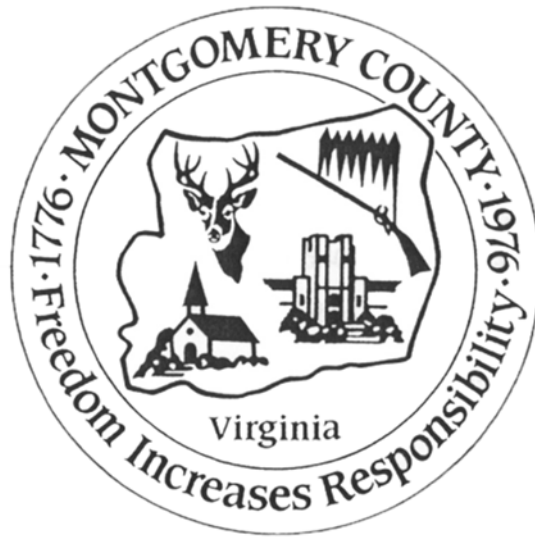


Montgomery County
Municipal Separate Storm Sewer System (MS4)
VPDES Permit No. VAR040134
Year 2 Annual Report



Coverage Issued: May 21, 2014
Reporting Period: July 1, 2015 through June 30, 2016

Prepared by:
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Date: September 30, 2016
Revised January 27, 2016

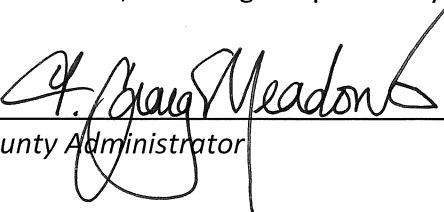
Background Information

This document serves as the annual report for the reporting period of July 1, 2015 through June 30, 2016 for Montgomery County, Virginia General Permit No. VAR040134 (effective May 21, 2014 – June 30, 2018).

In this past permit year there have been no significant modifications to any department's roles and responsibilities as described in the County's Program Plan (dated April 2014). Approximately 80% of the MS4 outfalls and associated acreage by HUC have been mapped during the permit year; no new MS4 outfalls and associated acreage by HUC were added during the permit year. Minor revisions to BMPs are described in the body of the annual report based upon evaluations made upon the end of the reporting year.

CERTIFICATION

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


County Administrator

1/27/17
Date

VAR040134

Permit Number

Montgomery County, VA

MS4 Name

Minimum Control Measure Implementation

MCM 1: PUBLIC EDUCATION AND OUTREACH ON STORMWATER IMPACTS

This minimum control measure is intended to implement a diverse public education program to increase target audience knowledge about the steps that can be taken to reduce stormwater pollution and hazards associated with illegal discharges and improper disposal of waste.

Annual Reporting Requirements

1. Identification of three (3) high-priority water quality issues that contribute to the discharge of stormwater and a rationale for the selection of the three high-priority water quality issues.
 - i. *Bacteria*
 - ii. *Nutrients (Nitrogen and Phosphorous)*
 - iii. *Sediment*

2. Identification and estimation of the population size of the target audience or audiences who is most likely to have significant impacts for each high-priority water quality issue.

The identification and estimation of the target audience(s) was not completed during the reporting period, due to personnel changes and other commitments of existing staff. This information will be provided in the next annual report.

3. Development of relevant message or messages and associated educational and outreach materials for message distribution to the selected target audiences while considering the viewpoints and concerns of the target audiences including minorities, disadvantaged audiences, and minors.

Montgomery County has recently entered into an agreement with the Montgomery County office of the Virginia Cooperative Extension to assist with and provide public education and outreach. No new materials were developed during the reporting period, due to the timing of the agreement with the Virginia Cooperative Extension, personnel changes and other commitments of existing staff. A list of materials to be developed will be provided in the next annual report.

4. Public participation during public education and outreach program development.

Refer to BMPS 1-1 and 1-2.

5. Summary of annual education and outreach activities designed to reach an equivalent 20% of each high-priority issue target audience.

Montgomery County has recently entered into an agreement with the Montgomery County office of the Virginia Cooperative Extension to assist with and provide public education and outreach. No education and outreach activities were completed during the reporting period, due to the timing of the agreement with the Virginia Cooperative Extension, personnel changes and other commitments of existing staff. A summary of activities to be conducted will be provided in the next annual report.

6. Adjustment of target audiences and messages including educational materials and delivery mechanisms to reach target audiences in order to address any observed weaknesses or shortcomings.

Montgomery County has recently entered into an agreement with the Montgomery County office of the Virginia Cooperative Extension to assist with and provide public education and outreach. No education and outreach activities were conducted during the reporting period, due to the timing of the agreement with the Virginia Cooperative Extension, personnel changes and other commitments of existing staff. A summary proposed adjustments will be provided in the next annual report.

7. A list of the education and outreach activities conducted during the reporting period for each high-priority water quality issue, the estimated number of people reached, and an estimated percentage of the target audience or audiences that will be reached.

Montgomery County has recently entered into an agreement with the Montgomery County office of the Virginia Cooperative Extension to assist with and provide public education and outreach. Additionally, Channel 190 on Shentel and XFINITY is the local channel that periodically shows information regarding stormwater management. No education and outreach activities were conducted during the reporting period, due to the timing of the agreement with the Virginia Cooperative Extension, personnel changes and other commitments of existing staff.

8. A list of the education and outreach activities that will be conducted during the next reporting period for each high-priority water quality issue, the estimated number of people that will be reached, and an estimated percentage of the target audience or audiences that will be reached. *Montgomery County has recently entered into an agreement with the Montgomery County office of the Virginia Cooperative Extension to assist with and provide public education and outreach. A list and details regarding the proposed activity is provided in BMP 1-2.*

BMP 1-1: Montgomery County Stormwater Management Website

Develop a Montgomery County Stormwater Management website, where citizens can obtain information regarding the County's Stormwater Management Program, ordinances, design guidelines, general information, contact information, pollution prevention information, educational programs and links to other organizations and sites. The website will also inform the citizens about on-going community based projects.

Measureable Goals Achieved in Reporting Year

Stormwater management web page is located on County's website covering construction pollution, MS4 permit, stormwater reporting, and the stormwater ordinance.

<http://www.montgomerycountyva.gov/content/15989/16023/16945/default.aspx>

Annual Reporting Requirements

- | | |
|------------------------------|---------------------------------------|
| 1. Estimated number of views | 261 |
| 2. Most popular material | Report Stormwater Problems (53 views) |

BMP 1-2: Stormwater Education Program

Develop a stormwater educational program for Montgomery County school age children. Educators will develop and provide programs addressing storm water and related water quality issues. Different programs will target appropriate grade levels and will be SOL correlated.

Measureable Goals Achieved in Reporting Year

The Director of Environmental Services/County Engineer coordinated with the Virginia Cooperative Extension and the Montgomery County Public Schools to develop and facilitate a Stream Quality Assessment Field Day for 6th Graders throughout the school year.

Annual Reporting Requirements

1. Summary of educational program. *During the week of April 25, 2016, the Montgomery County 4-H and the Skyline Soil and Water Conservation District held Stream Water Quality Assessment Field Day at Camp Alta Mons for approximately 280 Blacksburg Middle School 6th grade science students. The day included instruction on indicators of water quality – macroinvertebrate counts, physical measures (temperature, vegetation, etc.), and chemical tests (dissolved oxygen, nitrates, pH, and turbidity). There was discussion about stormwater runoff and watersheds, types of pollution, etc.*
2. Summary of future program goals. *The Stream Water Quality Assessment Field Days are scheduled for September 2016 for Christiansburg Middle School 6th grade science students, and in October 2016 and April 2017 for other county 6th grade students. Approximately 240 students will be reached during the 2016/2017 reporting period, based on attendance at previous Skyline Soil and Water Conservation District held Stream Water Quality Assessment Field Days and the population of the schools scheduled to attend.*

MCM 2: PUBLIC INVOLVEMENT/PARTICIPATION

This minimum control measure is intended to implement a program that helps to inform and educate County residents.

Annual Reporting Requirements

1. Update the MS4 Program Plan a minimum of once a year. *Refer to BMP 2-1.*
2. Post copies of the annual report on the website. *Refer to BMP 2-1.*
3. Participate in a minimum of four (4) local activities annually. *Refer to BMP 2-2 and 2-3.*

BMP 2-1: Montgomery County MS4 Program Plan and Annual Reports Posted to Stormwater Website

The Montgomery County's MS4 Program Plan and annual reports are posted to the Stormwater Management website, where citizens can provide review and comment.

Measureable Goals Achieved in Reporting Year

The Director of Environmental Services/County Engineer worked with the Public Information office to update and post the permit, program plan, and annual report(s) to the stormwater management website.

Annual Reporting Requirements

1. Update the MS4 Program Plan a minimum of once a year. *The MS4 Program Plan was updated; refer to Attachment 2-1.*
2. Post copies of the annual report on the website. *Web link to the MS4 Program plan and annual report web page:*
<http://www.montgomerycountyva.gov/content/15989/16023/16945/default.aspx>

BMP 2-2: MS4 Annual Report to Board of Supervisors

Provide an annual update to the Montgomery County Board of Supervisors.

Measureable Goals Achieved in Reporting Year

The Director of Environmental Services/County Engineer provided an update to the Board of Supervisors during the June 28, 2016 meeting.

Annual Reporting Requirements

The Board of Supervisors agenda and meeting minutes from June 28, 2016 will be included in the 2016/2017 annual report.

BMP 2-3: Annual Local Outreach Activities

Develop a plan and a MOU with the Town of Blacksburg, Town of Christiansburg, City of Radford, Radford University and/or Virginia Tech to participate in up to four (4) local outreach activities, including the annual update to the Board of Supervisors.

Measureable Goals Achieved in Reporting Year

The Director of Environmental Services/County Engineer met on March 1, 2016 and May 31, 2016 with the Town of Blacksburg, Town of Christiansburg, Virginia Tech, and the City of Radford to discuss the MOU and to identify three (3) local outreach activities.

Annual Reporting Requirements

1. The localities met to discuss joint participation in outreach activities; however, due to schedules, competing commitments, and personnel changes, the localities did not meet to finalize the MOU. Montgomery County will evaluate during the 2016/2017 reporting period the viability of the MOU and whether a regional approach to the outreach activities is viable.
2. Summary of the three (3) events. *To be provided in the 2016/2017 annual report.*

MCM 3: ILLICIT DISCHARGE DETECTION AND ELIMINATION

This minimum control measure is intended to detect and eliminate illicit discharges to the MS4 storm system.

Annual Reporting Requirements

1. A list of any written notifications of physical interconnection given by the operator to other MS4s. *Refer to BMP 3-3.*
2. The total number of outfalls screened during the reporting period, the screening results, and detail of any follow-up actions necessitated by the screening results. *Refer to BMP 3-3. In the 2016/2017 reporting period and beyond, the County anticipates using trained in-house staff to perform screening and reporting of the required 50 outfalls of the 65 identified MS4 outfalls in the 2016/2017 reporting year.*
3. A summary of each investigation conducted by the operator of any suspected illicit discharge. The summary must include: (i) the date that the suspected discharge was observed, reported, or both; (ii) how the investigation was resolved, including any follow-up, and (iii) resolution of the investigation and the date the investigation was closed. *Refer to BMP 3-3.*

BMP 3-1: Storm Sewer and Outfall Map and Database

Develop, maintain, and update a Storm Sewer and Outfall Map and Database to include the following information as required by the MS4 General Permit (9VAC25-890-40).

Measureable Goals Achieved in Reporting Year

As per the MS4 Program Plan, 50% of the MS4 outfalls were mapped and a database was created by June 2016; 100% of the MS4 outfalls are to be mapped and a database created by June 2017.

Annual Reporting Requirements

Status of the outfall map and database development, including any schedule updates and documentation of property transfers that may have occurred since the prior annual report: *Approximately 85% of the MS4 outfalls were mapped by June 30, 2016, and are included in a database. Since the majority of the MS4 outfall mapping was recently completed, no outfalls were screened during the reporting period and, therefore, no property transfers occurred. Since June 30, 2016, 100% of the outfalls were mapped. There are 65 MS4 outfalls identified in the Montgomery County urbanized area.*

BMP 3-2: Illicit Discharge Ordinance

Establish a program to detect and eliminate illicit discharges in to the Municipal Separate Storm Sewer System by developing and adopting regulations and an enforcement program to prevent illegal discharges into the MS4 storm drain system.

Measureable Goals Achieved in Reporting Year

The Illicit Discharge Ordinance was drafted and public hearing was held on June 9, 2015.
The Illicit Discharge Ordinance was approved by the Board of Supervisors on June 22, 2015.

Annual Reporting Requirements:

Status of ordinance development and adoption. *The Illicit Discharge Ordinance was drafted and public hearing was held on June 9, 2015. Board of Supervisors approved the ordinance on June 22, 2015. Refer to Attachment 3-2.*

BMP 3-3: Illicit Discharge Program

Develop, implement, and enforce a program to detect and eliminate illicit discharges, as defined in the MS4 General Permit (9VAC25-890-40).

Measureable Goals Achieved in Reporting Year

The Director of Environmental Services/County Engineer implemented a program that efficiently and effectively meets the MS4 General Permit Requirements.

Annual Reporting Requirements

1. Status of the illicit discharge program development, including any schedule updates and a list of physical interconnection given by the operator to other MS4s. *The illicit discharge program was previously developed by the County. Refer to Attachment 3-3. Current known physical interconnections occur with the Town of Christiansburg, Town of Blacksburg, and VDOT. Letters will be forwarded to these entities in the 2016/2017 reporting period.*
2. Summary of outfalls screened during the reporting period. *Since the outfall mapping was completed in October 2016, outfalls were not screened during this annual reporting period.*
 - a. Total number of outfalls screened. *None*
 - b. Screening results *Not applicable*
 - c. Details of follow-up actions, if any. *None.*
3. A summary of each investigation conducted by the operator of any suspected illicit discharge. *There were no suspected illicit discharges in the reporting year.*

MCM 4: CONSTRUCTION SITE STORMWATER RUNOFF CONTROL

This minimum control measure is intended to reduce pollutants in stormwater runoff from land disturbing activities to the MS4 storm system.

Annual Reporting Requirements

- | | |
|--|-------------|
| 1. Total number of regulated land-disturbing activities | 62 |
| 2. Total number of acres disturbed | 61.36 acres |
| 3. Total number of inspections conducted | 184 |
| 4. Total number of enforcement actions taken | 41 |
| 5. Type of enforcement actions taken during the reporting period | |

Notice of Corrective Action (41)

BMP 4-1: Erosion and Sediment Control Program Update

Update the existing Erosion and Sediment Control Ordinance and associated documents including written plan review procedures, written inspection procedures and schedule, written compliance and enforcement, certification of staff, and definition of roles and responsibilities procedures to comply with the requirements of the MS4 General Permit.

Measureable Goals Achieved in Reporting Year

The Director of Environmental Services/County Engineer drafted an update of the Erosion and Sediment Control Ordinance and program, including specifics regarding steep slope development.

Annual Reporting Requirements

Summary of tasks completed to date and updated schedule, as needed, for the erosion and sediment control program update. *The Director of Environmental Services/County Engineer provided an update to the program on July 25, 2016 and the revised ordinance (Attachment 4-1) was approved on September 12, 2016.*

BMP 4-2: Erosion and Sediment Control Tracking and Reporting

Develop a tracking and reporting mechanism for regulated land-disturbing activities to provide the required reporting in all subsequent annual reports.

Measureable Goals Achieved in Reporting Year

The Director of Environmental Services/County Engineer developed a current and accurate database of regulated land-disturbing activities.

Annual Reporting Requirements

1. Status of the tracking and reporting program development including tasks completed to date and schedule updates. *A tracking and reporting program – Montgomery Permitting and Inspections Portal – is currently being used to track land-disturbing activities.*
2. Upon completion of the program development, provide information regarding the total number of regulated land-disturbing activities, total number of acres disturbed, total number of inspections completed; and summary of enforcement actions taken, including the total number and type of enforcement actions taken during a reporting period. *Refer to information above in MCM 4.*

MCM 5: POST-CONSTRUCTION STORMWATER MANAGEMENT IN NEW DEVELOPMENT AND DEVELOPMENT ON PRIOR DEVELOPED LANDS

This minimum control measure is intended to reduce pollutants in stormwater runoff from developed properties to the MS4 storm system.

Annual Reporting Requirements

1. Provide a summary of the electronic database of all known operator-owned and privately-owned stormwater management facilities that discharge into the MS4. *Refer to BMP 5-2.*
2. Submit an electronic database or spreadsheet of all stormwater management facilities brought online during each reporting year with the appropriate annual report. *Refer to BMP 5-2.*

BMP 5-1: Stormwater Management Ordinance and Manual

Develop, adopt, and enforce an ordinance and policies and a procedures manual requiring stormwater quality and quantity controls for applicable land-disturbing activities in compliance with state and federal regulations and with the requirements of the MS4 General Permit.

Measureable Goals Achieved in Reporting Year

The stormwater ordinance and a policies and procedures manual to prevent or minimize water quality and quantity impacts from new or re-developments were adopted and implemented by July 1, 2014.

Annual Reporting Requirements

Summarize the status of the ordinance and manual development and evaluation. *The stormwater ordinance and manual have been adopted and implemented. Refer to Attachment 5-1.*

BMP 5-2: Stormwater Management Tracking and Reporting System

Develop and maintain a database of all known operator-owned and privately-owned stormwater management facilities that discharge into the MS4 storm system for tracking and reporting.

Measureable Goals Achieved in Reporting Year

An electronic database for BMP inspection schedules was previously developed to meet the requirements of the MS4 General Permit.

Annual Reporting Requirements

Submit an electronic database of all stormwater management facilities, including those completed during each reporting year, with the annual report. *Refer to Attachment 5-2.*

BMP 5-3: Individual Lot Special Criteria

Develop and implement strategies other than maintenance agreements such as periodic inspections, homeowner outreach and education, and other methods targeted at promoting the long-term maintenance of stormwater control measures that are designed to treat stormwater runoff solely from the individual residential lot.

Measureable Goals Achieved in Reporting Year

Individual Lot Special Criteria was developed; refer to Attachment 5-3.

Annual Reporting Requirements

Provide information regarding strategies employed, the means of advertisement, location of the event, and the number of citizens reached. *Since this is a new program, there is no information this annual reporting period.*

MCM 6: POLLUTION PREVENTION/GOOD HOUSEKEEPING FOR MUNICIPAL OPERATIONS

This minimum control measure is intended to reduce pollutants in stormwater from daily operations and maintenance activities and municipal facilities, and from turf and landscape areas.

Annual Reporting Requirements

1. A summary report on the development and implementation of the daily operational procedures. *Refer to BMP 6-2.*
2. A summary report on the development and implementation of the required SWPPPs. *Refer to BMP 6-3.*
3. A summary report on the development and implementation of the turf and landscape nutrient management plans. *Refer to BMP 6-4.*
4. A summary report on the required training, including a list of training events, the training date, the number of employees attending training and the objective of the training. *Refer to BMP 6-4.*

BMP 6-1: Household Hazardous Waste Event

Expand current program and encourage citizen participation in events to dispose of household materials that could be hazardous to dispose of in bulk landfills.

Measureable Goals Achieved in Reporting Year

Increased the number of household waste events by two (2) per year and citizen participation.

Annual Reporting Requirements

Since December 2014, the Montgomery Regional Solid Waste Authority has held monthly collection events at its permanent household hazardous waste facility located at 555 Authority Drive in Christiansburg, Virginia. These events are open to residents of the Town of Blacksburg, Town of Christiansburg, and Montgomery County. Between July 1, 2015 and June 30, 2016, approximately 337 citizens participated and the Authority has collected approximately 55,000 pounds of material.

BMP 6-2: Municipal Good Housekeeping Procedures

Develop and implement written procedures designed to minimize or prevent pollutant discharge from: (i) daily operations such as road, street, and parking lot maintenance; (ii) equipment maintenance; and (iii) the application, storage, transport, and disposal of pesticides, herbicides, and fertilizers.

Measureable Goals Achieved in Reporting Year

Written procedures were developed this annual reporting period.

Annual Reporting Requirements

Summarize the status of the good housekeeping procedures development including tasks completed to date and schedule updates. *Municipal Good Housekeeping Procedures were developed; refer to Attachment 6-2.*

BMP 6-3: Municipal SWPPPS

Develop and update SWPPPs for high-priority municipal facilities, including a training program. Each facility will be evaluated for the potential of illicit discharges from storage yards, outdoor storage areas, waste transfer stations, fleet or maintenance shops and other municipal facilities. The disposal method for waste materials will be evaluated. Any operation that has potential to discharge material into the municipal separate storm sewer system will be examined for potential for unwanted discharge.

Measureable Goals Achieved in Reporting Year

Four (4) high-priority facilities were identified within the current MS4 boundary.

- (1) MCPS Facilities Department
- (2) Christiansburg High School
- (3) Christiansburg Middle School
- (4) Elliston Industrial Park

Annual Reporting Requirements

Summarize the status of the SWPPP development, including name and location of facilities where the plans are completed, in progress, and yet to be started, and schedule updates. *The high-priority facilities were identified; a SWPPP was prepared for the MCPS Facilities Department this annual reporting period; refer to Attachment 6-3. The County intends to develop future SWPPPs as per the following schedule.*

<u>Site</u>	<u>Scheduled Completion</u>
(1) <i>Christiansburg High School</i>	<i>June 2017</i>
(2) <i>Christiansburg Middle School</i>	<i>June 2017</i>
(3) <i>Elliston Industrial Park</i>	<i>June 2018</i>

BMP 6-4: Municipal Nutrient Management Plans

Develop and implement Nutrient Management Plans on all required lands as per the schedule provided in 9VAC25-890-40.

Measurable Goals Achieved in Reporting Year

Twelve (12) applicable lands within the current MS4 boundary were identified.

- (1) Blacksburg Middle/High School
- (2) Christiansburg High School
- (3) Christiansburg Middle School
- (4) Old Christiansburg Middle School
- (5) Christiansburg Primary School
- (6) Falling Branch Elementary School
- (7) Prices Fork Elementary School
- (8) Gilbert Linkous Elementary School
- (9) Harding Ave. Elementary School
- (10) Margaret Beeks Elementary School
- (11) Old Blacksburg High School
- (12) Old Blacksburg Middle School

Annual Reporting Requirements

- 1. Status of the program development and implementation. *Twelve (12) applicable lands within the current MS4 boundary were identified. The County intends to develop the SWPPPs as per the following schedule.*

	<u>Site</u>	<u>Scheduled Completion</u>
(1)	<i>Blacksburg Middle/High School</i>	<i>June 2017</i>
(2)	<i>Christiansburg High School</i>	<i>June 2017</i>
(3)	<i>Christiansburg Middle School</i>	<i>June 2017</i>
(4)	<i>Old Christiansburg Middle School</i>	<i>June 2018</i>
(5)	<i>Christiansburg Primary/Elementary School</i>	<i>June 2018</i>
(6)	<i>Falling Branch Elementary School</i>	<i>June 2018</i>
(7)	<i>Prices Fork Elementary School</i>	<i>June 2018</i>
(8)	<i>Gilbert Linkous Elementary School</i>	<i>June 2018</i>
(9)	<i>Harding Ave. Elementary School</i>	<i>June 2019</i>
(10)	<i>Margaret Beeks Elementary School</i>	<i>June 2019</i>
(11)	<i>Old Blacksburg High School</i>	<i>June 2019</i>
(12)	<i>Old Blacksburg Middle School</i>	<i>June 2019</i>

- Total acreage of lands where turf and landscape nutrient management plans are required.

Site	Acres
(1) Blacksburg Middle/High School	44.2
(2) Christiansburg High School	18.9
(3) Christiansburg Middle School	15.5
(4) Old Christiansburg Middle School	9.5
(5) Christiansburg Primary/Elementary School	21.0
(6) Falling Branch Elementary School	13.8
(7) Prices Fork Elementary School	8.7
(8) Gilbert Linkous Elementary School	6.0
(9) Harding Ave. Elementary School	3.7
(10) Margaret Beeks Elementary School	8.7
(11) Old Blacksburg High School	12.9
(12) Old Blacksburg Middle School	<u>16.5</u>

Total Acres: 179.4

- Acreage of lands upon which turf and landscape nutrient management plans have been implemented. *None during this reporting period.*

BMP 6-5: Municipal Training Program

Develop an annual written training plan including a schedule of training events that ensures implementation of the training requirements of the MS4 Permit.

Measureable Goals Achieved in Reporting Year

An annual written training plan was developed; refer to Attachment 6-5.

Annual Reporting Requirements

- Summary of required training events – *Training events were not conducted during the reporting period, due to personnel changes and other commitments of existing staff. The County's goal in the next reporting period is to develop the training program and complete one training session by June 30, 2017.*
- Summary of the training or certification program is provided to emergency response employees shall be included in the first annual report. *Montgomery County has approximately 200 firefighters trained at various levels of Hazardous Materials Response. This training is provided as part of the Department of Fire Programs, The Virginia Department of Emergency Management, and the Virginia Association of Volunteer Rescue Squads training courses. The following courses were attended by Montgomery County firefighters during the reporting year.*
 - Hazardous Materials First Responder – Awareness and Operations*
 - Chemistry of Hazardous Materials*
 - Hazardous Material Advanced Tactical Control*
 - Hazardous Materials Incident Planning and Management*
 - Hazardous Materials Tactical Command and Safety*

OTHER MS4 PERMIT REPORTING REQUIREMENTS

- A. Results of information collected and analyzed, including monitoring data, if any, during the reporting period. *No additional information was collected and/or analyzed.*
- B. A summary of the stormwater activities the operator plans to undertake during the next reporting cycle. *Refer to Minimum Control Measures discussion above.*
- C. A change in any identified best management practices or measurable goals for any of the minimum control measures including steps to be taken to address any deficiencies. *Refer to updated MS4 Program Plan; see Attachment 2-1.*
- D. Notice that the operator is relying on another government entity to satisfy some of the state permit obligations (if applicable). *This will be addressed with a MOU with adjoining MS4 agencies.*
- E. The approval status of any programs pursuant to Section II.C of the general permit (if appropriate), or the progress towards achieving full approval of these programs. *Refer to Minimum Control Measures discussion above.*
- F. Information required for any applicable TMDL special condition contained in Section I of the general permit. *Not applicable.*

ATTACHMENT INDEX

- 2-1: MS4 Program Plan
- 3-2: Illicit Discharge Ordinance
- 3-3: Illicit Discharge Program
- 4-1: Erosion & Sediment Control Ordinance
- 5-1: Stormwater Management Ordinance
- 5-2: Database of stormwater management facilities completed during the reporting year
- 5-3: Individual Lot Criteria
- 6-2: Municipal Good Housekeeping Procedures
- 6-3: MCPS Facilities Department SWPPP
- 6-5: Municipal Training Program