



## RIPDES SMALL MS4 ANNUAL REPORT

### GENERAL INFORMATION PAGE

RIPDES PERMIT #RIR040 005

REPORTING PERIOD:

☒ **YEAR 8**

Jan 2011-Dec 2011

#### OPERATOR OF MS4

Name: CITY OF PROVIDENCE			
Mailing Address: 25 DORRANCE STREET			
City: PROVIDENCE	State: RI	Zip: 02903	Phone: (401) 421-2489
Contact Person: WILLIAM C. BOMBARD, P.E.		Title: CITY ENGINEER	
Legal status (circle one): PRI - Private <u>PUB - Public</u> 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:		

#### 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.)**

IV.B.1.b.1 Provide a General Summary of activities implemented to educate your community on how to reduce storm water pollution. For TMDL affected areas, with storm water 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.

Save The Bay (STB) does marine science based education programs with several schools in the Providence School System. Education programs are aligned with Grade Level Expectation's and Grade Span Expectation's and take place in the classroom, aboard one of their educational vessels or at The Save The Bay Center in Providence. Depending on the program students are exposed to various concepts such as bay diversity, coastal and benthic habitats, water quality, pollution and other marine related topics. Last year 2783 students participated in 203 STB programs from the following schools: Anthony Carnevale Elementary, Charlotte Woods elementary School, Dr. Martin Luther King Jr. School, Edmund w. Flynn , Frank D. Spaziano Elementary School, Mary E. Fogarty, Perry Middle School, Robert Bailey Elementary, Robert F. Kennedy, Vartan Gregorian, Providence Afterschool Alliance, West Broadway, Juanita Sanchez Education Complex (Colley and PAIS), John Hope Settlement House, Crossroads Providence, Ready to Learn, Boys Scouts of RI, Nathan Bishop Middle School, MET, Smith Hill Community Center and various pre-schools located in Providence

IV.B.1.b.2 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 storm water program. Describe partnerships with governmental and non-governmental agencies used to involve your community.

The City works with Save the Bay volunteers to mark storm drains. In the reporting year, there was one volunteer group from Sophia Academy which marked approximately 80 storm drains. Community groups become involved through neighborhood and community cleanup programs. The City lends various tools and equipment and provides trash/recycle pickup.

Also, Save The Bay (STB) does marine science based education programs with several schools in the Providence School System. Education programs are aligned with Grade Level Expectation's and Grade Span Expectation's and take place in the classroom, aboard one of their educational vessels or at The Save The Bay Center in Providence. Depending on the program students are exposed to various concepts such as bay diversity, coastal and benthic habitats, water quality, pollution and other marine related topics. Last year 2783 students participated in 203 STB programs

Additional Measurable Goals and Activities: Please indicate if the following training sessions were attended and list the name(s) and municipal position of all staff who attended the training. (Please note that participation in these trainings was required for those MS4s who committed to participating in the URI NEMO Stormwater Public Education and Outreach Program.)

Attendance at the following trainings if applicable:

☒ RI Stormwater Design and Installation Standards Manual: Workshop Part #1 - Manual Overview (January 13, 2011)

Attending name of staff and title: David Everett, Planner

Attending name of staff and title: William C. Bombard, PE, City Engineer

☐ RI Stormwater Design and Installation Standards Manual: Workshop Part #2 - BMP Construction and Maintenance (January 19, 2011)

Attending name of staff and title: \_\_\_\_\_

Attending name of staff and title: \_\_\_\_\_

☒ RI Stormwater Design and Installation Standards Manual: Workshop Part #3 - A detailed look at the required sizing calculations and critical elements of BMP design (March 22, 2011)

Attending name of staff and title: Craig Hochman, Civil Engineer

Attending name of staff and title: \_\_\_\_\_

☒ RI Stormwater Design and Installation Standards Manual: Workshop Part #4 - A detailed look at the required specifications and measures for BMP construction and maintenance (March 24, 2011)

Attending name of staff and title: Craig Hochman, Civil Engineer

Attending name of staff and title: \_\_\_\_\_

☐ A New Approach to Financing Stormwater Management: Stormwater Utility Districts. Workshop Part 1: Managing Stormwater in Tough Budget Times (October 25, 2011)

Attending name of staff and title: David Everett, Planner

Attending name of staff and title: \_\_\_\_\_

☒ A New Approach to Financing Stormwater Management: Stormwater Utility Districts. Workshop Part 2: Success Stories From New England (November 17, 2011).

Attending name of staff and title: David Everett, Planner

Attending name of staff and title: William C. Bombard, PE, City Engineer

Other Trainings:



## 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.)**

IV.B.2.b.2.ii	Describe audiences targeted for the public involvement minimum measure, include a description of the groups engaged, and activities implemented and if a particular pollutant(s) was targeted. If addressing TMDL requirements indicate how the audience(s) and/or activity address the pollutant(s) of concern. Name of person(s) and/or parties responsible for implementation of activities identified. Assess the effectiveness of BMP and measurable goal.
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The City has issued a public notice in the Providence Journal on February 22, 2012. A Public Meeting was to be held on March 6, 2012 if the City received requests from twenty-five (25) people, a governmental agency or subdivision, or an Association having no less than twenty-five (25) members. During this time, copies of the annual report were available at the Department of Public Works and on the DPW website (<http://www.providenceri.com/DPW>) for public comment.

Save The Bay (STB) does marine science based education programs with several schools in the Providence School System. Education programs are aligned with Grade Level Expectation's and Grade Span Expectation's and take place in the classroom, aboard one of their educational vessels or at The Save The Bay Center in Providence. Depending on the program students are exposed to various concepts such as bay diversity, coastal and benthic habitats, water quality, pollution and other marine related topics. Last year 2783 students participated in 203 STB programs from the following schools: Anthony Carnevale Elementary, Charlotte Woods elementary School, Dr. Martin Luther King Jr. School, Edmund w. Flynn , Frank D. Spaziano Elementary School, Mary E. Fogarty, Perry Middle School, Robert Bailey Elementary, Robert F. Kennedy, Vartan Gregorian, Providence Afterschool Alliance, West Broadway, Juanita Sanchez Education Complex (Colley and PAIS), John Hope Settlement House, Crossroads Providence, Ready to Learn, Boys Scouts of RI, Nathan Bishop Middle School, MET, Smith Hill Community Center and various pre-schools located in Providence

#### Additional Measurable Goals and Activities

IV.B.1.b.1 and 5 Make the Storm Water Management Plan available to the General Public  
The Storm Water Management Plan was made available to the General Public through a Providence Journal Legal Advertisement on February 22, 2012.

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

Date of Public Notice: February 22, 2012	How public was notified: Providence Journal
Was public meeting held? YES NO	
Date:	Where:
Summary of public comments received:	

Planned responses or changes to the program:

No changes to the program planned.



## MINIMUM CONTROL MEASURE #3: ILLCIT 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.)**

IV.B.3.b.1:	Indicate if the outfall map was not completed, 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.) <b>Date of Completion: YEAR 4 (November 2008)</b>
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Outfall map was completed and submitted in Year 4. DPW Engineering Division is responsible.

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 2011 calendar year.
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The City of Providence has chosen not to implement the tagging of outfalls. All outfalls have been located through the use of a handheld GPS (sub-meter accuracy) in 2008.

IV.B.3.b.3	Provide a summary of the implementation of recording of system additional elements (catch basins, manholes, and/or pipes). Indicate if the activity was implemented as a result of the tracing of illicit discharges, new MS4 construction projects, and inspection of catch basins required under the IDDE and Pollution Prevention and Good Housekeeping Minimum Measures, and/or as a result of TMDL related requirements and/or investigations. Assess effectiveness of the program minimizing water quality impacts.
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Over the past four years, work has commenced on scanning all sewer plans and field books to tie into the proposed GIS system. 80% of catch basins, 90% of manholes and 90% of culverts have been geolocated by a Citywide aerial flight.

The City has an informal program of inspection for manholes and catch basins. As these structures are cleaned, a visual inspection is performed by the operator. If anything out of the ordinary is observed, it is sent to the DPW Engineering Division for investigation and follow-up. This is an effective program for the manholes and catch basins surveyed, however, there are approximately 25% of these structures visited in a reporting year.

This program has not been effective in minimizing water quality impacts.

IV.B.3.b.4	Indicate if the IDDE ordinance was <b>not</b> developed, adopted and submitted to RIDEM, explain reasons why, submit proposed schedule for completion and identify person(s) / Department and/or parties responsible for the completion of this requirement.
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**Date of Adoption: 12/8/05 (Illicit Discharge Detection and Elimination – No. 569)**

If the Ordinance was amended in 2011, please indicate why changes were necessary.

n/a

IV.B.3.b.5.ii, iii, iv, & v	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.
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The City has a computer based service request system (QAlert) to receive citizen inquiries and complaints by phone and e-mail. The system is capable of generating work orders and will automatically email citizens upon fulfillment of a service request. Such requests are received by the Department of Public Works, Office of Neighborhood Services, City Council Office or the Mayor's Office.

The Department of Public Works, Engineering Division is responsible for tracing the illicit discharge. The DPW, Environmental Division is responsible for enforcing the removal of the illicit discharge. Tracing illicit discharges does not occur and is therefore ineffective.

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

IV.B.3.b.5.vi	Provide summary of implementation of catch basin and manhole inspections for illicit connections and non-storm water discharges. If the required measurable goal of inspecting all catch basins and manholes for this purpose was not accomplished, please indicate reasons why, the proposed schedule of completion and identify person(s) / Department and/or parties responsible for the implementation of this requirement. Evaluate effectiveness of the implementation of this requirement. The operator must keep records of all inspections and corrective actions required and completed.
<p>The City has an informal program of inspection for manholes and catch basins. As these structures are cleaned, a visual inspection is performed by the operator. If anything out of the ordinary is observed, it is sent to the DPW Engineering Division for investigation and follow-up. This is an effective program for the manholes and catch basins surveyed, however, there are many thousands not surveyed in a given reporting year, therefore the goal of inspecting all catch basins and manholes was not accomplished. The City has approximately 16,000 catch basins and gutter inlets, some connected to the combined sewer system. The DPW Sewer Division is responsible for the implementation of this requirement.</p> <p>The City does not have a program that identifies/catalogues catch basins and manholes, nor does the City have the necessary personnel to implement this requirement.</p>	
IV.B.3.b.5.vii	<p>If dry weather surveys including field screening for non-storm water flows and field tests of selected parameters and bacteria were not completed, indicate reasons why, proposed schedule for the completion of this measurable goal and person(s) / Department and/or parties for the completion of this requirement. Evaluate effectiveness of the implementation of this requirement. <b>The results of the dry weather survey investigations must be submitted to RIDEM electronically, if not already submitted or if revised since 2009, in the RIDEM provided EXCEL Tables and should include visual observations for all outfalls during both the high and low water table timeframes, as well as sample results for those outfalls with flow. The EXCEL Tables must include a report of all outfalls and indicate the presence or absence of dry weather discharges.</b></p> <p><b>Date of Completion: Year 4 (November 2008)</b></p>
n/a	
IV.B.3.b.7	Provide a description of efforts and actions taken as a result of for coordinating with other physically interconnected MS4s, including State and federal owned or operated MS4s, when illicit discharges were detected or reported. Identify person(s) / Department and/or parties responsible for the implementation of this requirement. Evaluate effectiveness of the implementation of this requirement.
<p>Illicit discharges have not been traced, nor have new illicit discharges been reported. The Department of Public Works Engineering Division is responsible for this requirement.</p> <p>This requirement is ineffective due to the fact that illicit discharges are not traced.</p>	
IV.B.3.b.8	Provide a description of efforts and actions taken for the referral to RIDEM of non-storm water discharges not authorized in accordance to Part I.B.3 of this permit or another appropriate RIDES 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.
To date, no non-storm water discharges have been traced. The DPW Engineering Division is responsible for this requirement.	
IV.B.3.b.9	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-storm water discharges identified as significant contributors of pollutants. Include a description on how this activity was coordinated with the public education minimum measure and the pollution prevention/good housekeeping minimum measure programs. Identify person(s) / Department and/or parties responsible for the implementation of this requirement. Evaluate effectiveness of the implementation of this requirement.
<p>No formal efforts have been taken to inform public employees, businesses and the general public of hazards associated with illegal discharges, etc. Prior to the snow season beginning, management coordinates with staff to reduce distribution of sand by applying straight salt and reducing spreader output. This is generally reviewed on a storm by storm basis.</p> <p>Implementing this requirement has not been effective.</p>	



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

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 2011: 0	# of Illicit Discharges Tracked in 2011: 0
# of Illicit Discharges Eliminated in 2011: 0	# of Complaints Received: 0
# of Complaints Investigated: 0	# of Violations Issued: 0
# of Violations Resolved: 0	# of Unresolved Violations Referred to RIDEM: 0
Total # of Illicit Discharges Identified to Date (since 2003):	Total # of Illicit Discharges remaining unresolved at the end of 2011:
Summary of Enforcement Actions: None	
Extent to which the MS4 system has been mapped: 75%	
Total # of Outfalls Identified and Mapped to Date: 175	

**SECTION II.B Interconnections (Part 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:
None found					



**MINIMUM CONTROL MEASURE #4:  
CONSTRUCTION SITE STORM WATER 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.)**

IV.B.4.b.1	Indicate if the Sediment and Erosion Control and Control of Other Wastes at Construction Sites ordinance was <b>not</b> developed, adopted and submitted to RIDEM, explain reasons why, submit proposed schedule for completion and identify person(s) / Department and/or parties responsible for the completion of this requirement. <b>Date of Adoption: 12/08/05 (Soil Erosion and Sediment Control – No. 568)</b> If the Ordinance was amended in 2011 please indicate why changes were necessary.
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N/A

IV.B.4.b.6	Describe actions taken as a result of receipt and consideration of information submitted by the public.
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The City maintains computer based service request system to receive citizen inquiries and complaints by phone and e-mail. The system is capable of generating work orders and will automatically email citizens upon fulfillment of a service request. The DPW Engineering and Environmental Divisions are responsible for responding to considerations and complaints.

IV.B.4.b.8	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 Storm Water 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.
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Currently, all sites are inspected. Current inspection details are included in Section 6.3 of the SWMPP. The DPW, City Engineer and building officials are responsible for this goal.

**Additional Measurable Goals and Activities**

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

**CONSTRUCTION SITE STORM WATER RUNOFF CONTROL cont'd**

**SECTION II. A - Plan and SWPPP Reviews during Year 8 (2011) 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.

**IV.B.4.b.4:** Review 100% of plans and SWPPPs 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 Reviews completed: 0

Summary of Reviews and Findings, include an evaluation of the effectiveness of the program. Identify person(s) /Department and/or parties responsible for the implementation of this requirement.  
No projects with a land disturbance greater than 1 acre were reviewed.

**SECTION II.B - Erosion and Sediment Control Inspections during Year 8 (2011) (Part IV.G.2.n) Part IV.B.4.b.7:** Inspection of 100% of all construction projects within the regulated area that discharge or have the potential to discharge to the MS4 (the program must include two inspections of all construction sites, first inspection to be conducted during construction for compliance of the Erosion and Sediment controls at the site, the second to be conducted after the final stabilization of the site).

# of Site Inspections: 0

# of Complaints Received: 0

# of Violations Issued: 0

# of Unresolved Violations Referred to RIDEM: 0

Summary of Enforcement Actions, include an evaluation of the effectiveness of the program. Identify person(s) /Department and/or parties responsible for the implementation of this requirement.  
None



**MINIMUM CONTROL MEASURE #5:  
POST CONSTRUCTION STORM WATER 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.)**

IV.B.5.b.5	Describe activities and actions taken to coordinate with existing State programs requiring post-construction storm water management.
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The City has actively required developers of parcels less than 1 acre to conform to the Post-Construction Storm Water Management Ordinance

IV.B.5.b.6	Describe actions taken for the referral to RIDEM of new discharges of storm water 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 storm water discharges associated with industrial activity to ensure that facilities will obtain the proper permits).
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No new industrial activity has been proposed within the City

IV.B.5.b.9	Indicate if the Post-Construction Runoff from New Development and Redevelopment Ordinance was <b>not</b> developed, adopted and submitted to RIDEM, explain reasons why, submit proposed schedule for completion and identify person(s) / Department and/or parties responsible for the completion of this requirement. <b>Date of Adoption: 12/08/05 (Post Construction – Storm Water Control – No. 567)</b> If the Ordinance was amended in 2011 please indicate why changes were necessary.
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N/A

IV.B.5.b.12	Describe activities and actions taken to identify existing storm water structural BMPs discharging to the MS4 with a goal of ensuring long term O&M of the BMPs.
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The City has not identified new existing storm water structural BMP's discharging to the MS4 during the reporting year.

The City has coordinated with RIDOT and NBC for identification of existing structural BMP's in past reporting years. New BMP's are identified during plan review stages by the Engineering Department at DPW. Many of the existing structural BMP's are not the responsibility of the City, but are still known by municipal staff.

The energy dissipater and sediment forebay at York Pond is the only structural BMP owned and maintained by the City.

**Additional Measurable Goals and Activities**

The City has pending amendments to the Comprehensive Plan referencing the State Stormwater Design and Installation Manual and encouraging vegetation, natural drainage patterns and on-site infiltration. Additional language will reference RIPDES and the requirements of MS4's, citing NEMO resources, encouraging partnerships, BMP's, rain barrels, improved pet waste pickup, appropriate lawn care practices, as well as youth education.

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

**SECTION II.A. - Plan and SWPPP Reviews during Year 8 (2011) Part IV.B.5.b.4:** Review 100% of post-construction BMPs for the control of storm water runoff from new development and redevelopment projects that result in discharges to the MS4 which incorporates consideration of potential water quality impacts (the program requires reviewing 100% of plans for development projects greater than 1 acre, not reviewed by other State programs).

# of Post-Construction Reviews completed: 0

Summary of Reviews and Finding, include an evaluation of the effectiveness of the program. Identify person(s) /Department and/or parties responsible for the implementation of this requirement.  
N/A

**SECTION II.B. - Post Construction Inspections during Year 8 (2011): Parts IV.G.2.o and IV.B.5.b.10 Proper Installation of Structural BMPs:** Inspection of BMPs, to ensure these are constructed in accordance with the approved plans (the program must include inspection of 100% of all development greater than one acre within the regulated areas that result in discharges to the MS4 regardless of whom performs the review).

# of Site Inspections: 0

# of Complaints Received: 0

# of Violations Issued: 0

# of Unresolved Violations Referred to RIDEM: 0

Summary of Enforcement Actions:  
None

**SECTION II.C. - Post Construction Inspections during Year 8 (2011): Parts IV.G.2.p and IV.B.5.b.11 Proper Operation and Maintenance of Structural BMPs (Part)** 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: 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. Identify person(s) /Department and/or parties responsible for the implementation of this requirement.  
None



**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.)**

IV.B.6.b.1.i	Describe activities and actions taken to identify structural BMPs owned or operated by the small MS4 operator (the program must include identification and listing of the specific location and a description of all structural BMPs in the SWMPP and update the information in the Annual Report). Evaluate appropriateness and effectiveness of this requirement.
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The City is responsible for one structural BMP at the inlet to York Pond consisting of an energy dissipater and a sediment forebay. Plans are kept at Department of Public Works. (-71.380301, 41.835045)

The BMP is not maintained and is ineffective.

IV.B.6.b.1.ii	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.
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There are no detention/retention basins maintained by the City. Storm sewers and catch basins are cleaned as needed, with attention given to problematic areas. A database is maintained to monitor storm-related problem areas throughout the City. This data has been linked to a GIS map.

The City's one digger has cleaned 761 catch basins, river grates and chutes. 527 tons of debris was removed, consisting of sand, organic debris, floatables and garbage.

IV.B.6.b.1.iii	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.
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Total # of CBs within regulated area (including SRPW and TMDL areas) approximately 12,000

Total # of CBs inspected in 2011: 761

Total # of CBs cleaned in 2011: 761

The City has not met the requirement for yearly inspection and cleaning of all catch basins. Until such time as the sewer maps are digitally available and it can be determined which catch basins are connected to the MS4, not the combined sewer system, it will be difficult to obtain and track the required inspection reports.

In the reporting year, 527 tons of debris was collected from 761 cleaned catch basins.

IV.B.6.b.1.iv	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.
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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 the effect of 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.

IV.B.6.b.1.v	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.
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**POLLUTION PREVENTION AND GOOD HOUSEKEEPING IN MUNICIPAL OPERATIONS cont'd**

<p>There are no known discharges causing scouring at outfall pipes after two dry weather surveys.</p> <p>Excessive sedimentation is found at the forebay at York Pond. The watershed is approximately 1.75 sq. miles and has many hills, requiring substantial sand during snow/ice events. The forebay is cleaned as needed. This is the responsibility of the DPW Sewer Department.</p>	
IV.B.6.b.1.vi	<p>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.</p> <p>Total roadway miles within regulated area (including SRPW and TMDL areas): 421</p> <p>Total roadway miles that were swept in 2011: approximately 2500 roadway miles</p>
<p>All streets were swept 6-7 times during the reporting year. Main roads and commercialized areas are swept more frequently, as often as weekly. This is the responsibility of the DPW Highway Department utilizing two private vendors and two City owned street sweepers. This is a highly effective method of sweeping.</p>	
IV.B.6.b.1.vii	<p>Describe activities and actions taken for controls to reduce floatables and other pollutants from the MS4. Evaluate appropriateness and effectiveness of this requirement.</p> <p>In previous years, the City has issued trash barrels with lids, serving as the only barrel a resident can use to dispose trash. The City enforces a "no bin, no barrel" policy, in which trash is only collected with the presence of properly sorted recyclables. The City has also created a dropoff at the Department of Public works for E-waste. This has made a marked improvement in the amount of floatables.</p> <p>The City also maintains trash containers in high pedestrian areas</p>
IV.B.6.b.1.viii	<p>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.</p> <p>Sediment excavated from catch basins are disposed of at the landfill.</p> <p>All floatables from the MS4 are disposed of at the landfill. The DPW Sewer and Highway Departments are responsible for this goal.</p> <p>The City maintains trash collection facilities in major pedestrian areas throughout the City which helps minimize floatables in the MS4.</p>
IV.B.6.b.4 and IV.B.6.b.5	<p>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 Storm Water Pollution Prevention Plan, and any actions taken to amend the Plan must be kept for record-keeping purposes.</p> <p>The City of Providence Department of Public Works facility has floor drains and catch basins which drain to the combined sewer system and, therefore, do not pose a threat to any waters of the state. Regardless, the DPW is ever diligent in maintaining a "clean house." Efforts have been made to eliminate bulk storage of chemicals needed for the operation of this department. Sand used for winter operations is stored indoors.</p>
IV.B.6.b.6	<p>Describe all employee training programs used to prevent and reduce storm water pollution from activities such as park and open space maintenance, fleet and building maintenance, new construction and land disturbances, and storm water system maintenance for the past calendar year, including staff municipal participation in the URI NEMO storm water public education and outreach program and all in-house training conducted by municipality or other parties. Evaluate appropriateness and effectiveness of this requirement.</p> <p>In-house training is done informally in the municipal garages. They are encouraged to take all precautions towards using maintenance procedures and minimizing impacts to storm water facilities. A formal program could be more effective.</p> <p>Additionally, Engineering staff attend URI NEMO trainings.</p>
IV.B.6.b.7	<p>Describe actions taken to ensure that new flow management projects undertaken by the operator are assessed for potential water quality impacts and existing projects are assessed for incorporation of additional water quality protection devices or practices. Evaluate appropriateness and effectiveness of this requirement.</p>

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

The City continues to assess potential water quality impacts to existing and new flow management projects as areas are being developed or redeveloped and as potential water quality impacts arise during the permitting process. This proves to be an effective and appropriate means to review water quality impacts. If detrimental water quality impacts are foreseen a permit will not be issued to move forward.

The City Engineer is responsible for this action.

Additional Measurable Goals and Activities

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

BMP ID:	Location:	Name of BMP Owner/Operator:	Description of BMP:
York01	-71.380301, 41.835045	City of Providence	Energy Dissipater/Sediment Forebay

**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:
A present there are no plans to	-71.380301, 41.835045	Excessive Sedimentation	Clean forebay, dates unknown	York Pond -> Seekonk River
Woon14	-71.418092 41.827690	Sedimentation	Owner unknown: RIDOT or City	Woonasquatucket River

**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).**

A present there are no plans to modify the existing MS4 to incorporate any BMP's.

With all new sidewalk construction and reconstruction, a grass strip is incorporated at the front of the sidewalk. This action has added approximately 4,000 square yards of pervious area.

**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).**

None





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

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**SECTION I.** If you have been notified that discharges from your MS4 require non-structural or structural storm water 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 storm water identified in the approved TMDL (Part IV.G.2.d). Please indicate rationale for the activities chosen to address the pollutant of concern.

No progress has been made to confirm to the approved TMDLs in the City

DRAFT



## SPECIAL RESOURCE PROTECTION WATERS (SRPWs)

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

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

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

If you have discharges from your MS4 (regardless of its location) to any of the listed SRPWs or impaired waters (including impaired waters when a TMDL has not been approved), please provide an assessment of the progress towards expanding the MS4 Phase II Storm Water Program to include the discharges to the aforementioned waters and adapting the Six Minimum Control Measures to include the control of storm water 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.

There are no SRPWs in the City. No further action has been taken to adapting the Six Minimum Control Measures to the 303(d) Impaired Waters in the City.



# 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 storm water under the Rhode Island Pollutant Discharge Elimination System (RIPDES) Storm Water General Permit for Small Municipal Separate Storm Sewer Systems and Industrial Activity at Eligible Facilities Operated by Regulated Small MS4s (hereafter referred to as "the General Permit"), must submit an Annual Report, outlined in Part IV.G of the permit. The Report must be submitted each year after permit issuance by March 10<sup>th</sup> to track progress of compliance. If you have questions regarding this Annual Report Form contact Margarita Chatterton of the Rhode Island Department of Environmental Management (RIDEM), Office of Water Resources, Permitting Section at (401) 222-4700 ext. 7605.

The Annual Report must be submitted to:

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

### **INSTRUCTIONS FOR COMPLETION:**

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

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

Include your permit ID # to ensure proper tracking.

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

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

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

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

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

##### ***"Certification"***

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

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

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

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

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

One or more pages, front and back, are provided to report on the status of measurable goals which have been developed to aid in the implementation of strategies, procedures, and programs used to achieve each of the six minimum control measures in Part IV.B of the General Permit. This section provides narrative space for a descriptive explanation and evaluation of the actions taken to satisfy each of the minimum control measures for the 2011 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.

Describe whether each measurable goal was completed within the time proposed in the General Permit or your Storm Water 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 2011, number of illicit discharges tracked in 2011, number of illicit discharges eliminated in 2011, 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 2011. 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 reviews completed during Year 8 (2011) 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 storm water 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 storm water (Part IV.G.2.d).

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

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

**SPECIAL RESOURCE PROTECTION WATERS (SRPWs)**

**Section I:**

Complete this section only if your MS4, located outside Urbanized Areas or Densely Populated Areas, discharges to:

a SRPW as listed in Appendix D of the *RIDEM Water Quality Regulations* at this link:

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

or

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

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

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

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