STORMWATER MANAGEMENT PLAN

for

City of Westbrook, Maine

MS4 General Permit Effective July 1, 2022
Initially Submitted to Maine DEP March 31, 2021

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APPENDICES

1 INTRODUCTION

1.1 Overview of Regulatory Program

The City of Westbrook is subject to the General Permit for the Discharge of Stormwater from Small Municipal Separate Storm Sewer Systems (MS4s) which was issued by the Maine Department of Environmental Protection (DEP) with an effective date of July 1, 2022. Because the permit is a Clean Water Act permit, it is limited to a duration of five (5) years, and is due to expire on June 30, 2027. However, if the Maine DEP does not issue another Permit by June 30, 2027, the permit will be administratively continued and the City may need to update this Stormwater Management Plan to show what activities it will complete during the continued time period.

Communities are regulated under this program when and if they are identified as having "Urbanized Areas" in their municipal boundary. An Urbanized Area is a U.S. Census-defined term, applied to a large area (50,000 people or more) that has a high population density and/or a high percentage of impervious cover (hard scape surfaces like parking lots or buildings). Both of these criteria (high population density and high percentage of impervious cover) cause an area to be at risk for adverse surface water quality impacts from polluted stormwater discharges.

The U.S. Environmental Protection Agency (USEPA) and Maine DEP began regulating communities for their stormwater discharges using the Urbanized Area criteria in 2003. The City of Westbrook became regulated in 2003 based on the 2000 census.

Once a community becomes regulated by the MS4 General Permit, only the Urbanized Area portions of the City are regulated. As each U.S. Census is published, if the Urbanized Area changes (based on changes to the population or impervious cover), additional areas can be added to the regulated area only after a new MS4 General Permit is issued. Once an Urbanized Area is regulated by the MS4 General Permit, it cannot be removed from regulation, even if a subsequent census identifies it is no longer classified as an Urbanized Area. So the area regulated by the MS4 General Permit can either grow larger or stay the same size, but it cannot become smaller. Appendix A shows the Urbanized Area that is regulated by the 2022 MS4 General Permit for the City, which is based on the cumulative 2000 and 2010 U.S. Census Urbanized Area data. The 2022 MS4 General Permit specifically does not include any areas identified by the 2020 U.S. Census.

1.2 Cooperation Between Regulated Communities

There are 30 municipalities in the State of Maine that are subject to the 2022 MS4 General Permit. There are also two transportation agencies which are subject to their own MS4

General Permit, and eight state/federal agencies that are subject to a third MS4 General Permit (which are called "nested" MS4s). The regulated MS4s (municipal, transportation and state/federal) have a strong history of cooperating on a state-wide basis to complete activities required by the General Permit such as public outreach and training as a cost saving measure and to improve the quality of compliance.

The City of Westbrook is a member of the Casco Bay Interlocal Stormwater Working Group (ISWG), pronounced *izzy-wig.* ISWG is a coalition of 14 MS4 municipalities in the greater Portland and Saco areas (Biddeford, Cape Elizabeth, Cumberland, Falmouth, Freeport, Gorham, Old Orchard Beach, Portland, Saco, Scarborough, South Portland, Windham, and Yarmouth) as well as the Southern Maine Community College and University of Southern Maine which are also regulated as MS4s under a separate permit. This coalition is facilitated by the Cumberland County Soil and Water Conservation District, which also assists in completing some of the permit requirements under contract to the coalition.

Similarly, the Bangor area MS4s have formed the Bangor Area Stormwater Working Group (BASWG), the Lewiston-Auburn area MS4s formed the Androscoggin Valley Stormwater Working Group (AVSWG), and the southern-most regulated MS4s formed the Southern Maine Stormwater Working Group (SMSWG). For some public education requirements, all of the stormwater working groups are working cooperatively as identified in this plan.

In implementing the 2022 MS4 General Permit, the City of Westbrook relies on the ISWG to complete some requirements, hires a third party-consultant to implement some requirements and implements other requirements using municipal staff. This plan describes which elements will be completed individually, regionally or as a state-wide effort.

1.3 Stormwater Management Plan

Though the MS4 General Permit is a Clean Water Act Permit, it does not specify numeric effluent limitations (concentrations that a stormwater discharge must meet). Instead, the MS4 General Permit specifies narrative effluent limitations, in the form of Minimum Control Measures (MCMs).

Each of the four MS4 General Permits (effective 2003, 2008, 2013, and 2022) has required that the regulated MS4s develop and implement a Stormwater Management Plan (SWMP or Plan) to coincide with the effective dates of the General Permit.

This SWMP describes how the City will implement Best Management Practices (BMPs) to meet the six MCMs, set forth in Part IV(C) of the 2022 MS4 General Permit. The six MCMs that are required to be addressed in this Plan are:

1 Education/Outreach Program

2 Public Involvement and Participation
3 Illicit Discharge Detection and Elimination Program
4 Construction Site Stormwater Runoff Control
5 Post-Construction Stormwater Management in New Development and Redevelopment
6 Pollution Prevention/Good Housekeeping for Municipal Operations

The 2022 MS4 General Permit requires that for each MCM, the City must:

- Define appropriate BMPs
- Designate a person(s) responsible for implementing each BMP
- Define a date or timeline with milestones for implementation of each BMP
- Define measurable goals for each BMP

The prior MS4 General Permits also required that the SWMP address these six MCMs, but the specific requirements related to each MCM have changed with each permit. In many instances, the BMPs in this plan expand upon or continue BMPs that were developed under prior General Permits.

In addition to addressing the six (6) Minimum Control Measures, the City must address several impaired waters requirements. Sections 1.4 and 1.5 describe the water quality status in the City, and what watersheds are considered to be priorities. Sections 1.6 through 1.9 describe how permit coverage is obtained, how the SWMP is modified (when needed), when public notice is required, and annual reporting requirements.

The Maine DEP will review this Stormwater Management Plan and determine if the City is controlling pollutants to the "Maximum Extent Practicable". The term "Maximum Extent Practicable" is defined in the Clean Water Act. The term means available and feasible considering cost, existing technology, and logistics based on the overall purpose of the project. Effectively, the City is allowed to consider these concepts as they select Best Management Practices (BMPs) to meet permit requirements but the Maine DEP decides if the City is meeting the "Maximum Extent Practicable" standard.

The SWMP is not an enforceable document and so some flexibility is built in to the BMPs to allow communities to engage in an adaptive management approach to mitigating or eliminating the discharge of pollutants to and from its regulated small MS4. This allows the City to adjust BMPs throughout the Permit Cycle if needed based on evaluations of their effectiveness, changing conditions, specific local concerns, or changes in other factors. Some SWMP Modifications require DEP review and approval and public notice. Section 1.6 Obtaining Coverage to Discharge, and Section 1.8 SWMP Modifications describe the requirements associated with modifying a SWMP.

1.4 Water Quality and Discharges to Impaired Waters

The 2022 MS4 General Permit contains the following requirements for discharges to waters that are not meeting their fishable and swimmable standards (a.k.a. impaired waters):

1. If the waterbody to which a point source discharge drains is impaired and has an EPA approved total maximum daily load (TMDL) then the SWMP must address compliance with the TMDL waste load allocation ("WLA") and any implementation plan. The GP does not authorize a direct discharge that is inconsistent with the WLA of an approved TMDL. This requirement applies only to TMDLs that were approved by EPA as of 10/15/2020.
2. If a TMDL is approved or modified by EPA after 10/15/2020, the Maine DEP will notify the permittee if any changes are needed to the SWMP and may take other actions regarding the approved TMDL as identified in the 2022 MS4 General Permit.
3. If an MS4 has a discharge to an Urban Impaired Stream, it must develop and implement three (3) BMPs to address the water's impairment, unless the DEP has determined the MS4 discharge is not causing or contributing to the impairment.

The Fact Sheet that was issued with the 2022 MS4 General Permit also contained a strongly worded recommendation for MS4s to consult with the Maine DEP Division of Environmental Assessment regarding impaired waters that do not have approved TMDLs. The consult would be focused on identifying the root cause of the impairment and developing a strategy to reduce the discharge of pollutants of concern if the permittee is causing or contributing to the impairment.

Section 1.4.1 describes generally how the State evaluates surface waters and describes TMDL documents and Urban Impaired Streams. Section 1.4.2 describes the status of the waters that receive discharges from the City's MS4. If applicable, Section 1.4.3 describes recent progress by the City on addressing any impairments which have MS4 requirements, and provides rationale for how the BMPs in this SWMP address these 2022 MS4 General Permit requirements.

1.4.1 State Water Quality Assessments

The State of Maine is required by the Clean Water Act to identify water quality classifications for each surface water in the State, and then to assess whether each of those waters is meeting its designated classification standards. Maine has four classifications for freshwater rivers, three classes for marine and estuarine waters, and one class for lakes and ponds. Each classification identifies a use and set of water quality standards for the water. The classifications, uses, and standards are described and assigned to the various waters in the Maine Statutes (Title 38, Sections 464 through 469).

Assessments as to whether each water is achieving its designated classification are based on data that is obtained from a number of sources depending on the type of water being assessed:

- Lakes and ponds are assessed primarily through data obtained from the DEP and regional entities and lake associations. The regional and lake association data is coordinated through the Lake Stewards of Maine (Volunteer Lake Monitoring Program).

- Marine and Estuarine waters are assessed by evaluation of data obtained from the DEP, Maine Healthy Beaches, Department of Marine Resources, Marine Environment's Gulf Watch, Gulf of Maine Council, and several other academic and non-profit organizations.

- Wetlands are assessed primarily using data obtained from the DEP Biomonitoring Program.

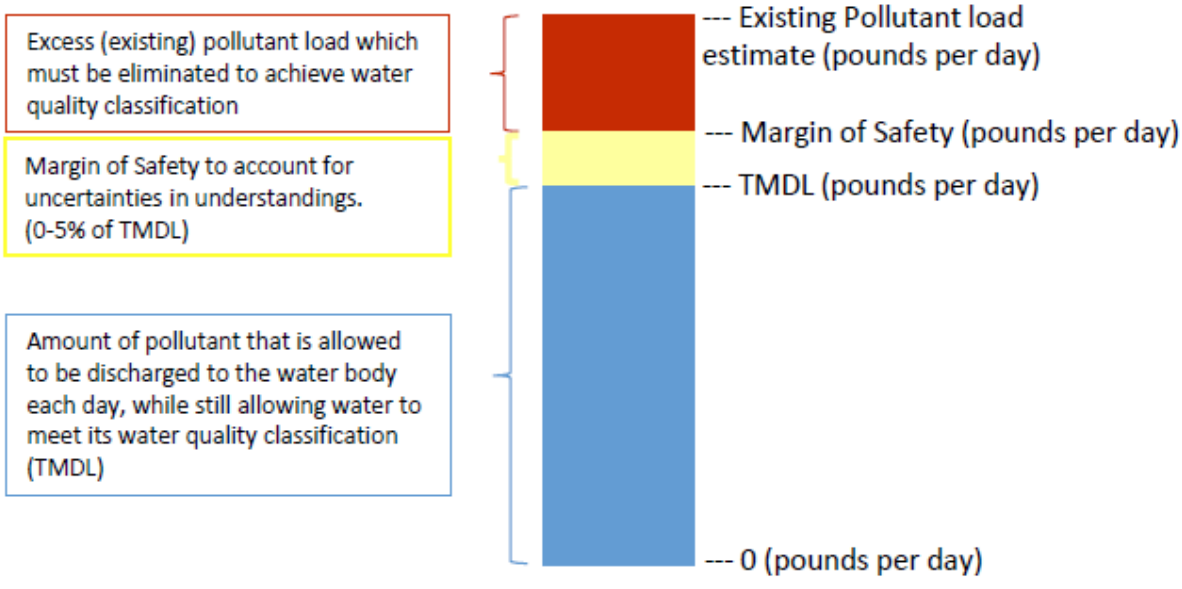
- Rivers and Streams are assessed using data from the DEP Biomonitoring Program, Surface Water Ambient Toxics (SWAT) Monitoring Program, the Atlantic Salmon Recovery Plan, Volunteer River Monitoring Program (VRMP) and through many other government agencies such as, but not limited to, the Department of Inland Fisheries and Wildlife, EPA, United States Geologic Survey.

Every two years, the DEP publishes a report and list documenting the results of the assessments, and identifying which waters are meeting their designated classifications, and which are considered impaired. The report and list are called the Integrated Water Quality Report and are generally referred to by the Section of the Clean Water Act which requires them as the 305(b) report and/or the 303(d) list, respectively. There are five general status categories available for assignment to each water:

- Category 1: Attaining all designated uses and water quality standards, and no use is threatened.
- Category 2: Attains some of the designated uses; no use is threatened; and insufficient data or no data and information is available to determine if the remaining uses are attained or threatened (with presumption that all uses are attained).
- Category 3: Insufficient data and information to determine if designated uses are attained (with presumption that one or more uses may be impaired).
- Category 4: Impaired or threatened for one or more designated uses, but does not require development of a TMDL (Total Maximum Daily Load) report.
    - 4A means a TMDL has already been completed
    - 4B means other pollution control measures will address impairment
    - 4C means the impairment is not caused by a pollutant
- Category 5: Waters impaired or threatened for one or more designated uses by a pollutant(s), and a TMDL report is required

In Maine, the most current 303(d) list approved by the EPA is from the 2016 data. The Maine DEP has indicated they will issue a combined 2018/2020/2022 303(d) list in spring 2022.

A TMDL document identifies the source(s) of the impairments and recommendations to correct the impairments. In particular, a TMDL document identifies how much of a pollutant a water body can receive and still meet its water quality classification. Typically, the units are identified as pounds per day, which is the basis for the term "Total Maximum Daily Load". TMDLs typically include a Margin of Safety between 2 and 5% of the TMDL to account for uncertainties or lack of knowledge about the relationship between the pollutant loading and water quality.



Total Maximum Daily Load (TMDL) Components

In addition to the Maine 305(b) report and 303(d) list, Maine has developed a special rule, Chapter 502, which has restrictions related to Direct Watersheds of Lakes Most at Risk from New Development and Urban Impaired Streams. This rule became effective in 1997 and has been modified several times over the years. The rule defines an Urban Impaired Stream as a stream that fails to meet its water quality standards because of effects of stormwater runoff from developed land. The rule imposes additional stormwater treatment controls on development in the watersheds of Urban Impaired Streams.

1.4.2 Westbrook Water Quality Status

The following is a summary of the waters in the City's Urbanized Area that receive point source discharges from the City's MS4 and each waterbody's TMDL and impairment status. **Table 1**

shows the waters where the City has MS4 discharges and their impairment status. The Table shows the number of MS4 outfalls (in parentheses) that discharge to each waterbody as of December 2020.

Figure 1 shows the locations of the fresh waters and their status according to the 2016 303(d) list (https://maine.maps.arcgis.com/apps/webappviewer/index.html?id=dffb3d2b85904b18978d02fc9d913b5f).

The following documents were reviewed in making these determinations:

- Statewide Bacteria TMDL (September 2009 and 2013 Addendum)
- Impervious Cover TMDL (September 2012)
- Statewide Non-Point Source TMDL (2015)
- Chapter 502 Direct Watersheds of Lakes Most at Risk from New Development and Urban Impaired Streams
- Final 2016 Maine Integrated Water Quality Report and Appendices (Maine 303(d) list)
- USEPA and Maine DEP approved TMDL lists
- Capisic Brook Watershed Management Plan (December 2012)

Figure 1 - City of Westbrook Freshwater Impairment Status

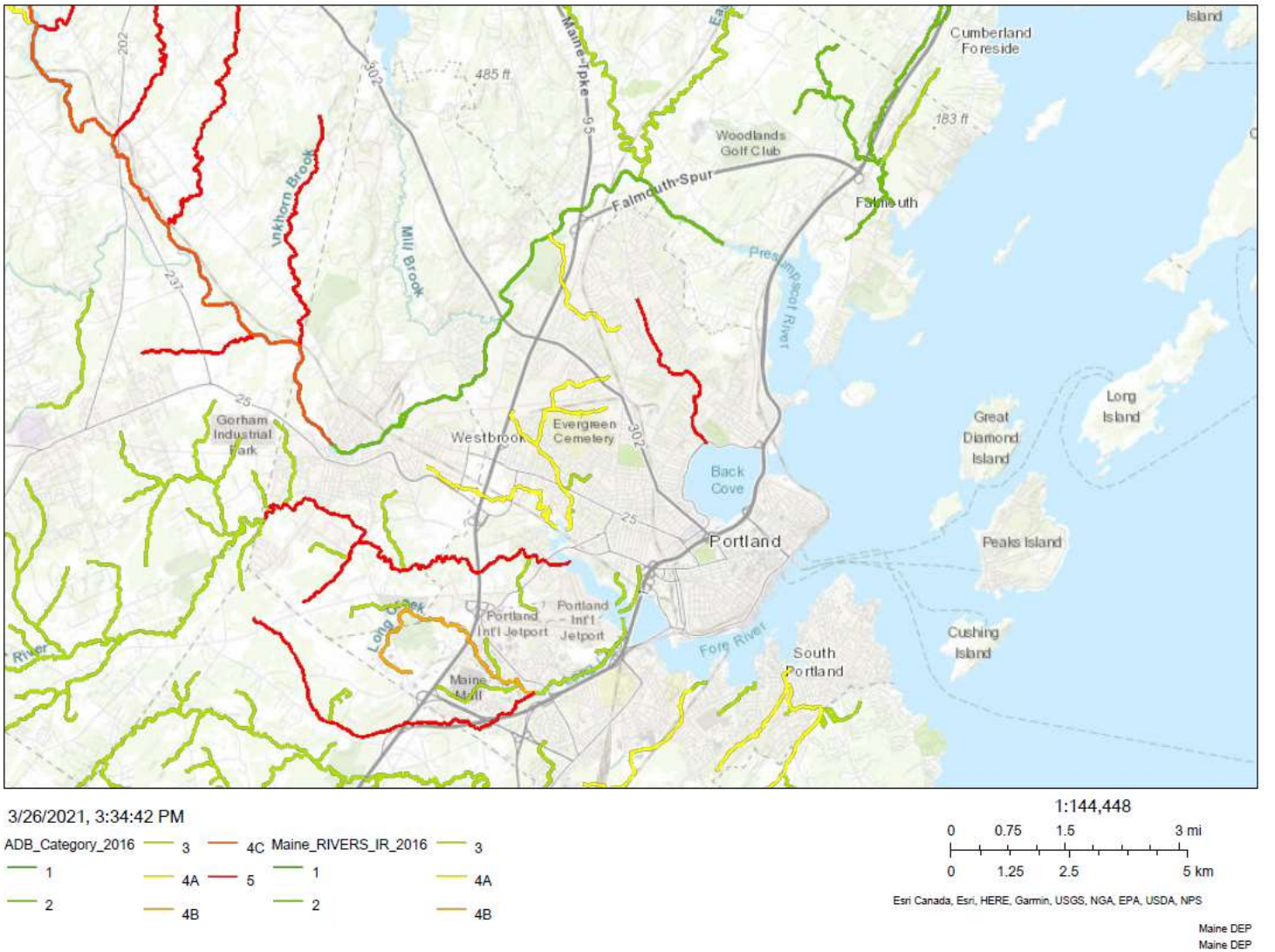


Figure 1 Fresh Water Impairment Status from 2016 303(d) list

Table 1 Status of Waterbodies Receiving MS4 Discharges – Westbrook Maine					
Water bodies with MS4 discharges (# outfalls)	**Maine DEP classification and numeric designation**	**Completed TMDLs (EPA approval date shown)**	**Urban Impaired Stream (Chap 502)**	**Non-TMDL listing in 2016 303(d) list**	**Watershed Management Plan / Other Water Quality Document**
Capisic Brook (4 piped outfalls)	ME0106000105_610R01_W023 Class C	9/27/2012: Aquatic life use impairments now Category 4-A due to approval of Statewide % IC TMDL	Yes	None	Yes – 2012 WMP
Fore River/Nasons Brook (16 piped outfalls)	ME0106000105_607R11_02 Class B	9/27/2012: Aquatic life use impairments now Category 4-A due to approval of Statewide % IC TMDL. 3/26/2012: New 5-A listing for aquatic life use due to dissolved oxygen impairment (based on 2008 TMDL-DO study data) and for algae (periphyton; nonattainment of biocriteria in 2003 and 2004 at biomonitoring station S-638).	Yes	None	No
Highland Lake (6 piped outfalls)	0106000103	None	No	Removed from 303(d) list in 2010	None
Mill Brook (50 piped outfalls + 34 ditches)	No Designation - Class B	None	No	None	Recommendations for Future Restoration and Management Efforts for Mill Brook, Westbrook, Maine
Minnow Brook (2 piped outfalls)	No Designation – Class B	None	No	None	None
Presumpscot River (72 piped	ME0106000103_609R_02 Class C	11/25/2014: CSO abatement ongoing. 9/28/2009: Recreational use impairments	No	None	None

outfalls)		now Category 4-A due to approval of statewide bacteria TMDL.			
Stroudwater River (64 piped outfalls)	ME0106000105_610R04 Class B	None	No	5A -TMDL required for DO.	None

Table 1 shows the City has two Urban Impaired Streams, Fore River/Nasons Brook and Capisic Brook which has its own Watershed Management Plan. As stated in the 2022 MS4 General Permit Fact Sheet, the City consulted with the Maine DEP Bureau of Water Quality to discuss what steps could be taken to best improve the quality of these Urban Impaired Streams. The recommendations from that meeting are summarized in Section 2.7 – Impaired Waters BMPs. Inkhorn Brook and Clark Brook are both listed as Category 5-A waters however there are no MS4 discharges to Inkhorn Brook and, it appears, none in Clark Brook.

1.4.3 Progress on addressing Impairments and approach to BMP development

Section 1.4.3 describes how impaired waters are addressed in this SWMP, and provides some background on work the City has done in recent years to improve water quality in these waters.

1.4.3.1 Discharges to Waters with TMDLs

Within Westbrook the only impaired water with a TMDL that received MS4 discharge is the Presumpscot River which has a bacteria TMDL. The drainage area for the Presumpscot River includes a large section of Westbrook's downtown area including Riverbank Park. In recent years the City has increased the frequency of street sweeping in the City to remove winter sand and litter from streets. This increased sweeping also removes pet waste, a bacteria source, from streets preventing it from washing into storm drains. The City will also be installing medallions reading "No Dumping – Drains to River" next to storm drains in the downtown area to educate the public and reduce the number of dog waste bags thrown into catch basins.

A second bacteria source in the downtown area is the large amount of waterfowl drawn to the river and park by frequent feeding of the animals. During the previous permit cycle, Public Services partnered with a Girl Scout to educate the public about the harm caused by feeding waterfowl and install signs with the same message in the park along the river. This outreach has driven conversations between residents on social media expanding the audience. The City will continue this outreach into the 2022 MS4 General Permit cycle.

1.4.3.2 Discharges to Urban Impaired Streams

This section describes the historical activities that have been undertaken and the current status of proposed and planned projects, which support the selection of 3 BMPs and their Measurable Goals as described in Section 2.7 of this SWMP.

As an Urban Impaired Stream, Capisic Brook has received much attention over the past decade in order to attempt to correct the Brook's impairment. A Watershed Management Plan was

developed for the Brook in 2012. Due to the small of the watershed and minimal infrastructure (4 piped outfalls) located in Westbrook, the major contribution by the City of Westbrook has been to ensure that all relevant MS4 General Permit MCMs have been enacted in the Capisic Brook watershed.

The Nasons Brook watershed (notated within Westbrook GIS as Fore River) contains a large amount of industrial and commercial development. While there is residential development in some of the remaining area, much is undeveloped land facing intense development pressure. There is no Watershed Management Plan in place for this watershed, therefore in pervious permit cycles, Westbrook has focused on ensuring that all relevant MS4 General Permit MCMs have been enacted in the watershed as in Capisic Brook.

Discussion with the Maine DEP Bureau of Water Quality informed the City that the most significant contributor to the impairment of both watersheds is salt. With that knowledge, and with guidance from DEP staff, the City has developed 3 BMPs for each watershed. A description of these BMPs can be found in section 2.7 of this SWMP.

1.4.3.3 Discharges to impaired waters that do not have TMDLs:

The Stroudwater River has recently been listed as an impaired water due to dissolve oxygen deficiency. The river is currently listed as 5-A status indicating that it needs a TMDL but is also classified as low priority for a TMDL by the Maine Department of Environmental Protection. The Stroudwater River passes through a variety of landscapes including residential area which may suggest that fertilizer runoff is a significant contributor to the impairment, however, the water is often visibly cloudy suggesting that significant erosion is occurring at some point along the river as well. The City has not yet met with the Maine DEP regarding this impairment however we plan to use the time between submission of this SWMP and 7/1/22 to work with DEP staff to determine the cause of the deficiency.

1.5 Priority Watersheds

Previous MS4 General Permits required that regulated MS4s identify a Priority Watershed, and apply BMPs to that Watershed. The 2022 MS4 General Permit does not contain any specific requirements related to Priority Watersheds. However, it does require that an MS4 have a procedure in place to prioritize watersheds when addressing illicit discharges. The City of Westbrook uses this prioritization to identify where illicit discharge inspections are conducted first. The City may also use the prioritization for illicit discharge investigations in the event there were insufficient resources to address all potential illicit discharges simultaneously. The IDDE Plan describes in more detail how the prioritization is applied.

The Maine DEP maintains a list of waters that are vulnerable to non-point source pollution, which is then available to receive grant funding under Sections 308(b) and 319 of the Clean

Water Act as long as the funding is not used to satisfy the conditions of a Clean Water Act Permit (such as the 2022 MS4 General Permit). The list includes the MS4's "Priority Watershed".

MS4s should keep in mind that they may not use 319 grant funding to implement any BMPs required by the MS4 General Permit.

The City's two highest priority watersheds are:

1. Mill Brook due to:
    a. The importance of the Brook to annual alewife migration, and
    b. The healthy condition of both the watershed and the waterbody
    c. The watershed is contained entirely in Westbrook allowing the City to maintain watershed and waterbody health through prioritization.

2. Capisic Brook due to:
    a. The brook is one of the City's two Urban Impaired Streams
    b. The brook has an established Watershed Management Plan

The locations of both watersheds are shown in the City of Westbrook Watershed Map included in the City IDDE plan which can be found in Appendix E

1.6 Obtaining Coverage to Discharge

As required, a Notice of Intent (NOI) to comply with the 2022 MS4 General Permit was submitted to the Maine DEP with this SWMP. A copy of the City's NOI is provided in Appendix B.

30-day Public Notice was provided by both the Maine DEP and the City to allow the public to comment on the SWMP. A copy of the Public Notice provided by the City is contained in Appendix B.

Following review of the SWMP and NOI, and receipt of any public comments, the Maine DEP issues a permittee specific DEP Order, establishing terms and conditions that are enforceable in addition to the language in the 2022 MS4 General Permit which is also enforceable.

The permittee specific DEP Order is also subject to a 30-day public comment period, but only the DEP provides this public notice. DEP provides any updated information to the City at the end of the public comment permit.

If no comments are received, DEP provides notice to the City that they are authorized to discharge under the 2022 MS4 General Permit and the permittee specific DEP Order.

Once the DEP issues authorization to discharge, the City has 60 days to update the SWMP to reflect any new or changed requirements based on the DEP Order and any comments. At that time, the permittee specific DEP Order will be included in Appendix B. In addition, the permittee will include all comments received in Appendix C along with any notes on how the comments were addressed in the SWMP. The SWMP needs to be resubmitted to the DEP after revision along with a narrative indicating how the SWMP has been modified to be consistent with the 2022 MS4 General Permit and permittee specific DEP Order unless the Department indicates in writing that resubmittal is not required. The new permit conditions do not take effect until **7/1/2022**.

1.7 SWMP Availability

The SWMP must be made available to the public by publishing on the City Website. A copy must also be made available to the public at the Westbrook Public Services Department located at 371 Saco Street.

If any of the following entities request a copy, one must be made immediately available to them:

a) USEPA or Maine DEP,
b) Any interconnected or adjacent MS4,
c) Any owner or operator of a water supply company where the MS4 discharges to a water supply watershed, or
d) Members of the public.

1.8 SWMP Modifications during the Permit Cycle

During the permit term (2022 to 2027), the SWMP must be kept current. As required by the 2022 MS4 General Permit, the City will amend the SWMP if the Maine DEP or the City determine that:

a) The actions required by the BMPs fail to control pollutants to the meet the terms and conditions of the 2022 MS4 General Permit and the permittee specific DEP Order;
b) The BMPs do not prevent the potential for a significant contribution of pollutants to waters of the State other than groundwater;
c) New information results in a shift in the SWMP's priorities.

Even though this SWMP is not an enforceable document, if any changes are made, the SWMP will be made available for 30-day public comment by posting the changes on the City's website.

If the changes being made are not explicitly required by the 2022 MS4 General Permit or the

permittee specific DEP Order, the opportunity for public comment will be made on the City's website annually and the DEP will be notified of the changes in the annual report following the permit year the changes were made.

If the changes being made are explicitly required by the 2022 MS4 General Permit or the permittee specific DEP order one of the following processes will be followed depending on who identified the need for the change:

- If the changes are initiated by the City, the Maine DEP will be notified prior to changing any elements by filing a permit application with the DEP that includes a justification to formally modify the requirement;
- If the changes are initiated by the Maine DEP, it will notify the City, and the City must respond in writing within 30 days of the notice explaining how it will modify the SWMP. The City must then modify the SWMP within 90 calendar days of the City's written response, or within 120 calendar days of the DEP notice (whichever is less). Any such modification must be submitted to the DEP for final review.

1.9 Annual Compliance Report and Record Keeping

By September 15 of each year, the City will electronically submit an Annual Compliance Report for the Maine DEP's review using a standardized form provided by the Maine DEP. The Annual Compliance Report must be sent to:

Rhonda.poirier@maine.gov
Municipal/Industrial Stormwater Coordinator
Department of Environmental Protection
17 State House Station Augusta,
Maine 04333-0017

The Annual Compliance Report must include the following:

a. The status of compliance with the terms and conditions of the 2022 MS4 General Permit and the City's permittee specific DEP Order, based on the implementation of the City's Plan for each permit year, an assessment of the effectiveness of the components of its stormwater management program, an assessment of the appropriateness of identified BMPs, progress towards achieving identified measurable goals for each of the MCMs and progress toward achieving the goal of reducing the discharge of pollutants to the (Maximum Extent Practicable (MEP)
b. A summary of the information collected and analyzed, including monitoring data, if any, during the reporting period.
c. A summary of the stormwater activities the City intends to undertake pursuant to its Plan to comply with the terms and conditions of the 2022 MS4 General Permit and the City's permittee specific DEP Order during the next reporting cycle.

d. A change in any identified BMPs or measurable goals that apply to the Plan.
e. A description of the activities, progress, and accomplishments for each of the MCMs #1 through #6 including such items as the status of education and outreach efforts, public involvement activities, stormwater mapping efforts, the number of visual dry weather inspections performed, the number of inaccessible and new outfalls, dry weather flow sampling events and laboratory results, detected illicit discharges, detected illicit connections, illicit discharges that were eliminated, construction site inspections, number and nature of enforcement actions, post construction BMP status and inspections, the number of functioning post construction BMPs, the number of post construction sites requiring maintenance or remedial action, the status of the permittee's good housekeeping/pollution prevention program including the percentage of catch basins cleaned, those catch basins cleaned multiple times and the number of catch basins that could not be evaluated for structural condition in a safe manner. Where applicable, the MS4 must quantify steps/measures/activities taken to comply with the 2022 MS4 General Permit and its Plan including reporting on the types of trainings presented, the number of municipal and contract staff that received training, the length of the training and training content delivered as well as any revisions to the SWPPP procedures and/or changes in municipal operations.

The Maine DEP will review the annual reports and provide comments to the MS4s. Changes to the report based on the Maine DEP's review comment(s) must be submitted to the Department within 60 days of the receipt of the comment(s).

The regulated MS4s must keep records required by the 2022 MS4 General Permit and permittee specific DEP Order for at least three (3) years following its expiration or longer if requested by the Maine DEP Commissioner. The regulated MS4s must make records, including this Plan, available to the public at reasonable times during regular business hours.

2 MINIMUM CONTROL MEASURES

1.1 MCM 1 Education/Outreach Program

The 2022 MS4 General Permit requires municipalities to develop and implement two Education/Outreach Campaigns to address stormwater issues of significance:

1. An Outreach to Raise Awareness Campaign targeted at two audiences applying three (3) tools per audience per year. One target audience must be the public and the second audience may be selected from: municipal, commercial, development/construction, or institutions.
2. An Outreach to Change Behavior Campaign to promote one behavior change directed at two audiences using a minimum of three (3) outreach tools per year. This campaign will promote and reinforce desirable behaviors designed to reduce stormwater pollution.

In 2018, the Interlocal Stormwater Working Group executed a statewide survey to assess public awareness of a variety of stormwater issues and related behaviors. The survey results report[1] was included in the ISWG Permit Year 5 (2017-2018) annual reports. In addition, the ISWG communities reviewed regional water quality related to stormwater issues, examined the unique conditions within each of their communities, and evaluated the needs for public education around stormwater at five of their regional meetings (9/13/2018, 3/21/2019, 7/18/2019, 3/26/2020, 5/21/2020). Based on the survey results and the discussions at their regional meetings, the ISWG communities agreed on which issues of significance to address and what tools and messages might be effective. Each of the BMPs provides a brief introductory section describing the rationale for the selection of the BMP based on the regional and local issues within the ISWG region. The BMPs are further structured to allow for adaptive education and outreach approaches to create a strong, diverse, and effective campaign over the duration of this permit.

The City will fulfill the requirements for Public Education/Outreach through participation in the ISWG and the City's provision of funding to the Cumberland County Soil & Water Conservation District (CCSWCD) for Public Education/Outreach services, as described in the following BMPs. The BMPs will be implemented according to their individual timelines over the term of the permit.

1.1.1 BMP 1.1 – Outreach to Raise Awareness Campaign

Responsible Party – Director of Engineering and Public Services (with implementation assistance from Cumberland County Soil & Water Conservation District)

The 2022 MS4 General Permit requires the permittee to raise awareness of the public as well as

[1] http://thinkbluemaine.cumberlandswcd.com/wp-content/uploads/2018/07/Survey_Summary-FINAL.pdf

one of the following groups: municipal, commercial, development/construction, or institutions. This BMP describes the reasoning and measurable goals for the public audience and the selected second audience: development/construction.

Background for Measurable Goal 1.1a Public Audience: The Think Blue Maine campaign began in 2003 as a statewide effort to raise awareness of common stormwater pollutants and ways to prevent those pollutants. The Think Blue Maine campaign has been historically successful in increasing awareness of stormwater issues. The ISWG, Androscoggin Valley Stormwater Working Group (AVSWG), and Southern Maine Stormwater Working Group (SMSWG) coordinate their Think Blue Maine messaging and education efforts to provide consistent messaging in Southern Maine. In addition, the Massachusetts and New Hampshire small MS4s are using similar Think Blue campaigns, so there is some regionally consistent messaging in circulation.

In 2018, the ISWG executed a statewide survey around public awareness of stormwater issues and behaviors that impact stormwater. Ninety-four percent of survey respondents in the ISWG region ages 25 to 34 stated it was "very important to have clean water in the lakes and streams in [their] community", and 86% of ISWG respondents ages 25 to 34 believe that stormwater runoff has a major impact or somewhat impacts water quality, but only 46% of ISWG respondents ages 25 to 34 were able to correctly describe what happens to stormwater at their residence. Because this age group has not been targeted before for education and has the potential to impact stormwater for many years into the future, the ISWG, AVSWG, and SMSWG communities will cooperatively use the Think Blue Maine campaign to raise awareness of the target audience to be more aware of stormwater issues and be more willing to change their behavior in the future.

Measurable Goal 1.1a – The City, through its participation in the ISWG, will raise 15%[2] of the target audience's awareness of what happens to stormwater at their residence or place of work. According to the 2019 US Census Bureau, the ISWG region's population for ages 25 to 34 is approximately 38,000 people: therefore 15% of the target audience is approximately 6,000 people.

Target Audience: People 25 to 34 in the ISWG region

Overarching Message: "Water that lands on our roads, roofs, and other hard surfaces picks up pollutants and carries them to our local waterbodies without being treated." This message will be presented with variations based on target audience interests and outreach tools used.

Outreach Tools: A minimum of three outreach tools will be selected from Appendix D each year. Each tool will be assessed and customized based on the target audience's receptiveness to the method. Any tool used in a given year will be tailored to the message for the relevant target audience subset based on common characteristics and/or demographics.

[2] As recommended in the EPA's "Getting in Step: A guide for conducting watershed outreach campaigns" (2003), when 15 to 20 percent of an audience adopts a new idea or behavior, it will be able to permeate to the rest of the audience.

Evaluation: Effectiveness will be evaluated annually by tracking process indicators[3] for each tool implemented that year and by tracking impact indicators[4] where available (see Appendix D).
Implementation schedule: A minimum of three of the tools from Appendix D will be implemented each year for the duration of the permit.

Background for Measurable Goal 1.1b Development/Construction Audience: Evaluation of municipal stormwater programs, through annual meetings with municipal staff and officials, has revealed a large amount of effort required to comply with MCM 4 tasks. The ISWG communities identified opportunities to address common MCM 4 goals through coordinated regional and statewide stormwater education to developers and contractors to reduce development and construction-related stormwater pollutants that are not already required by MCM 4. Due to the cyclical nature of the development/construction sector, a baseline evaluation will be conducted in Permit Year 1 to establish contractor and developer awareness and the baseline target audience.

Measurable Goal 1.1b – The City, through its participation in the ISWG, will raise awareness of developers and contractors by 15% from the Permit Year 1 established baseline audience of developers and contractors about construction-related stormwater pollutants and methods available to reduce discharge of those pollutants.

Target Audience: Developers and contractors who are located within the ISWG region.
Overarching Message: "Through proper design and site management, erosion and sediment control best management practices can reduce the potential to negatively impact local water bodies."
This message will be presented with variations based on target audience interests and outreach tools used.
Outreach Tools: A minimum of three outreach tools will be selected from Appendix D each year. Each tool will be assessed and customized based on the target audience's receptiveness to the method. Any tool used in a given year will be tailored to the message for the relevant target audience subset based on common characteristics and/or demographics.
Evaluation: Effectiveness will be evaluated annually by tracking process indicators for each tool implemented that year and by tracking impact indicators where available (see Appendix D). Effectiveness will also be measured by the number of DEP certified contractors operating in the ISWG region over the course of the permit term.
Implementation schedule: A minimum of three of the tools will be implemented each year for the duration of the permit.

1.1.2 BMP 1.2 –Outreach to Change Behavior Campaign

Responsible Party – Director of Engineering and Public Services (with implementation assistance from Cumberland County Soil & Water Conservation District)

[3] Indicators related to the execution of the outreach program.
[4] Indicators related to the achievement of the goals or objectives of the program.

The ISWG communities have focused on changing behavior to reduce nutrients into regional waterbodies in their MS4 permit for the past three permit cycles. The ISWG communities will continue their efforts to reduce sources of nutrients by promoting proper dog waste disposal to two target audiences this permit term for the following reasons:

1. Generally, excess nutrients in our waters are a nationally recognized water quality issue related to stormwater – there are multiple common sources of nutrients including sediments, pet waste, septic systems, and fertilizers.
2. The Statewide survey conducted in Permit Year 5 of the previous cycle identified that survey respondents are aware that nutrient sources (including dog waste) are a common stormwater pollutant and respondents expressed a willingness to take action to help reduce stormwater pollution. Eighty-four percent of 2018 survey respondents in the ISWG region ages 25 to 34 and 67% of 2018 survey respondents in the ISWG region ages 35 to 55 selected "picking up pet waste and putting it in the trash" as a practice they believed could reduce water pollution.
3. Most ISWG communities are part of the Casco Bay watershed. In the June 2019 Casco Bay Nutrient Council report, nutrients were identified as the main pollutant of concern for the health of Casco Bay. While there is discrepancy between nutrient models as to the contribution percentages of the three main sources of nutrients (stormwater, wastewater, and atmospheric deposition), stormwater runoff is believed to contribute between 24% and 64% of the nitrogen entering Casco Bay.
4. Several ISWG communities have encountered problems with dog waste not being picked up[5] or not being properly disposed of in the trash, causing local water quality concerns[6] and unsanitary conditions for the public and municipal staff.
5. Most ISWG communities have taken steps to discourage improper dog waste disposal through ordinances. However, there are currently still barriers to effectively educating and enforcing these types of ordinances.
6. Dog owners ages 25 to 64 are the least likely age group to pick up after their dog[7]. However, dog owners age 25 to 64 receive their information through different outreach methods[8]. In order to provide effective messaging on proper dog waste management, two audiences will be created to allow appropriate outreach tools to be used per age group.

   A baseline evaluation will be conducted in Permit Year 1 to establish dog owner behavior of dog waste disposal and the baseline target audience within the ISWG region.

Measurable Goal 1.2a – The City, through its participation in the ISWG, will work towards

[5] https://www.pressherald.com/2019/03/21/south-portland-raises-a-red-flag-over-dog-waste-problem-at-hinckley-park/

[6] https://www.pressherald.com/2019/08/30/south-portland-park-tests-positive-for-algae-that-can-harm-dogs/

[7] Hall, S.L. (2006 June) Survey on Poop: Half don't scoop; neighborhoods seeking solutions. *The News & Observer,* pp. B1.

[8] https://umaine.edu/undiscoveredmaine/small-business/resources/marketing-for-small-business/social-media-tools/social-media-statistics-details/

changing the behavior of 15% of pet owners from the Permit Year 1 established baseline audience of dog owners so more will properly dispose of their pet waste.

Target audience: Dog owners ages 25 to34 within the ISWG region

Overarching Message: "Dispose of dog waste as a solid waste, so it does not end up in our stormwater. Once in the stormwater, dog waste contributes nutrients, bacteria, and pathogens to our ponds, lakes, streams, rivers, and bays, which can lower property values, harm our drinking water, and hinder recreational and economic opportunities."
This message will be presented with variations based on target audience interests and outreach tools used.

Outreach Tools: A minimum of three outreach tools will be selected from Appendix D each year. Each tool will be assessed and customized based on the target audience's receptiveness to the method. Any tool used in a given year will be tailored to the message of the relevant target audience subset based on common characteristics and/or demographics.

Evaluation: Effectiveness will be evaluated annually by tracking process indicators for each tool implemented that year and by tracking impact indicators where available (see Appendix D). Effectiveness will also be evaluated by conducting visual (observational) surveys of dog waste disposal at public areas and tracking the presence of dog waste bags in catch basins.

Implementation schedule: A minimum of three of the tools will be implemented each year for the duration of the permit.

Measurable Goal 1.2b – The City, through its participation in the ISWG, will work towards changing the behavior of 15% of pet owners from the Permit Year 1 established baseline audience of dog owners so more will properly dispose of their pet waste.

Target audience: Dog owners ages 35 to 55 within the ISWG region

Overarching Message: "Dispose of dog waste as a solid waste, so it does not end up in our stormwater. Once in the stormwater, dog waste contributes nutrients, bacteria, and pathogens to our ponds, lakes, streams, rivers, and bays, which can lower property values, harm our drinking water, and hinder recreational and economic opportunities."
This message will be presented with variations based on target audience interests and outreach tools used.

Outreach Tools: A minimum of three outreach tools will be selected from Appendix D each year. Each tool will be assessed and customized based on the target audience's receptiveness to the method. Any tool used in a given year will be tailored to the message for the relevant target audience subset based on common characteristics and/or demographics.

Evaluation: Effectiveness will be evaluated annually by tracking process indicators for each tool implemented that year and by tracking impact indicators where available (see Appendix D). Effectiveness will also be evaluated by conducting visual (observational) surveys of dog waste disposal at public areas and tracking the presence of dog waste bags in catch basins.

Implementation schedule: A minimum of three of the tools will be implemented each year for the duration of the permit.

1.1.3 BMP 1.3 – Effectiveness Evaluation

Responsible Party – Director of Engineering and Public Services (with implementation assistance from Cumberland County Soil & Water Conservation District)

Measurable Goal 1.3a – The City, through its participation in ISWG, will submit an annual report each year of the 2022 MS4 General Permit term documenting the implementation of each BMP. The annual report will include the message for each audience, the methods of distribution, the outreach tools used, the measures/methods used to determine on-going effectiveness of the campaigns, and any changes planned based on the measures of effectiveness.

Measurable Goal 1.3b – In Permit Year 5 of the 2022 MS4 General Permit the City, through its participation in ISWG, will conduct an evaluation of the overall effectiveness of the Awareness and Behavior Change BMPs (BMPs 1.1 and 1.2). The evaluation will be a review of the annually reported benchmark values for the Awareness and Behavior Change BMPs as well as documentation of overall changes during the permit term. The evaluation will identify recommendations for future awareness and behavior change target audiences, messages, tools, and benchmarks. A comprehensive survey will be conducted for the ISWG region to evaluate the impact of the awareness campaigns.

1.1.4 BMP 1.4 – Additional Activities

Responsible Party – Director of Engineering and Public Services (with implementation assistance from Cumberland County Soil & Water Conservation District)

This BMP describes activities that are not required by the 2022 MS4 General Permit but are being conducted by the City to supplement the Education/Outreach program.

Measurable Goal 1.4a – The City will continue to support the Cumberland County Soil & Water Conservation District's youth education curriculum to community schools as funding allows. Annual reports will include the total number of students reached, which schools were involved, and the lesson topics covered.

Measurable Goal 1.4b – The City will support the regional YardScaping effort to reduce nutrients from entering regional waterways and increase buffers. Annual reports will include the total number of people reached with workshops, partner point of sale locations, and workshop survey data.

1.2 MCM 2 Public Involvement and Participation

The City will fulfill the requirements for Public Involvement and Participation through participation in the ISWG and the City's provisions of funding to Cumberland County Soil & Water Conservation District for Public Involvement and Participation services, or through directly fulfilling the requirements, as described in this section of the plan.

1.2.1 BMP 2.1 - Public Notice Requirement

Responsible Party – Director of Engineering and Public Services (with implementation assistance from Cumberland County Soil & Water Conservation District)

Measurable Goal 2.1a – The City will follow applicable state and local public notice requirements for their Stormwater Management Plans and Notices of Intent (NOIs) to comply with the MS4 General Permit. Copies of the NOIs and plans will be made available on the City's website. The City will document public meetings related to their stormwater program and attendance of those meetings in their annual report.

Measurable Goal 2.1b – The ISWG members meet as a group 6 times per year to review issues associated with implementation of the Stormwater Management Plan and MS4 General Permit. These meetings will be publicized through the CCSWCD website, on ISWG member websites, and open to the public.

1.2.2 BMP 2.2 - Public Event

Responsible Party – Director of Engineering and Public Services (with implementation assistance from Cumberland County Soil & Water Conservation District)

Measurable Goal 2.2a – The City will annually host, conduct, and/or participate in a public community event with a pollution prevention and/or water quality theme from the list included in the 2022 MS4 General Permit or another activity approved by the DEP. Stormwater stewardship and educational messages and activities will be incorporated into the event. The event will be advertised on the City's website, through the City's and CCSWCD's social media accounts, and other Municipal and CCSWCD communication methods. The annual report will include a description of the event and the estimated attendance/participation.

1.3 MCM 3 Illicit Discharge Detection and Elimination

The City will continue to implement its Illicit Discharge Detection and Elimination (IDDE) program, which includes:

- A Watershed-based map of the stormwater infrastructure,
- A written IDDE Plan which describes:
  - Inspections of the infrastructure during dry weather (and monitoring of outfall that flow during dry weather)
  - Investigations of potential illicit discharges,
  - Enforcement of the Non-Stormwater Discharge Ordinance
  - A Quality Assurance Project Plan
- Development of a list of outfalls that have the potential to cause illicit discharges during wet weather.

The City's ordinance can be found at:
https://www.ecode360.com/33911416?highlight=stormwater&searchId=3564914801295009

The following BMPs will be implemented to meet this Minimum Control Measure.

1.3.1 BMP 3.1 – Continue to Implement the Non-Stormwater Discharge Ordinance

Responsible Party - Director of Engineering and Public Services

Measurable Goal 3.1a – The City implemented a Non-Stormwater Discharge Ordinance on July 6, 2009. The Ordinance is cataloged as Chapter 281 Streets and Sidewalks; Article VI Non-stormwater Discharge, of the City's Code of Ordinances. Though the ordinance language gives the City Engineer (now the Director of Engineering and Public Services) and any employee(s) designated by the Mayor the authority to administer, implement and enforce the provisions of the article, it is standard practice for enforcement such as issuing letters of warning, notices of violation and/or fines to be carried out by Code Enforcement Officers. The City will continue to enforce this ordinance throughout the permit cycle. No ordinance changes are needed to comply with the 2022 MS4 General Permit.

Measurable Goal 3.1b – The City will document the results of enforcement actions taken for illicit discharges on an excel spreadsheet.

1.3.2 BMP 3.2 – Maintain the Written IDDE Plan

Responsible Party - Director of Engineering and Public Services

Measurable Goal 3.2a - The City prepared a written IDDE Plan during the previous permit cycle. This plan has been updated to contain the elements required in the 2022 MS4 General Permit (Part IV.C.3.b.i through vi). The IDDE Plan is contained in Appendix E of this SWMP. The plan will

be reviewed annually and updated if needed to reflect any changes to the program.

Measurable Goal 3.2b - The City will conduct a wet weather assessment in accordance with the 2022 MS4 General Permit Part IV.C.3.f, and will incorporate the wet weather assessment into their IDDE Plan by the end of Permit Year 5 (6/30/2027).

1.3.3 BMP 3.3 - Maintain Storm Sewer System Infrastructure Map

Responsible Party - Director of Engineering and Public Services

Measurable Goal 3.3a – The City created a watershed-based map of the MS4 infrastructure during the first three permit cycles (2003-2022). The map is online and available to the public on the home page of the City's website: www.westbrookmaine.com in the GIS Maps section. The map shows the locations of stormwater catch basins, drain manholes, connecting surface and subsurface infrastructure showing the direction of pipe flow and the locations of stormwater outfalls. The infrastructure is documented in a Geographic Information System (GIS), which contains unique identifiers for outfalls and catch basins, as well as outfall material, size and receiving water. The map is updated quarterly as follows:

- The GIS geodatabase is updated to reflect changes to infrastructure based on inspections by Public Services staff quarterly,
- The GIS geodatabase is updated when as-built drawings become available for municipal infrastructure

1.3.4 BMP 3.4 – Conduct Infrastructure Inspections and Monitor Flowing Outfalls

Responsible Party - Director of Engineering and Public Services

Measurable Goal 3.4a – The City's Public Services Staff will conduct infrastructure inspections for pollutants using the following frequency:

- One dry weather inspection will be conducted on each outfall at least once per permit cycle as required by the 2022 MS4 General Permit
- Dry weather ditch inspections will be conducted during the completion of ditch work
- Catch basins will be inspected for evidence of pollutants during their required sediment inspections (see BMP 6.4 for details).

The City's IDDE Plan (contained in Appendix E) describes the information collected electronically during infrastructure inspections. The City documents electronically in the GIS.

Measurable Goal 3.4b – If an outfall is observed to be flowing during dry weather inspections, the flow will be sampled and analyzed once per permit term using the methods described in the IDDE Plan unless it is exempt from dry weather investigations (as described in Part IV.C.3.e.vi of the 2022 MS4 General Permit). Outfalls sampled during dry weather will be handled as follows:

1. Outfalls where sampling and analysis reveals the potential for an illicit discharge: The City will investigate the catchment area associated with the outfall for potential illicit discharges as described under Measurable Goal 3.5a

2. Outfalls where sampling and analysis does not reveal the potential for an illicit discharge: The City will document the dry weather flow as either uncontaminated groundwater, water from a natural resource or an allowable non-stormwater discharge.

The Public Services department will summarize the monitoring results and any investigation completed, or the exempt status, as applicable in an Excel spreadsheet or GIS geodatabase.

1.3.5 BMP 3.5 – Conduct Investigations on suspect illicit discharges

Responsible Party - Director of Engineering and Public Services

Measurable Goal 3.5a – Whenever the Public Services Department becomes aware of a potential illicit discharge, it will investigate to identify the source using methods described in the written IDDE Plan (Appendix D). The Public Services Department will track the status and outcome of the investigations using an excel spreadsheet.

1.3.6 BMP 3.6 – Significant Contributors of Pollutants

Responsible Party - Director of Engineering and Public Services

Measurable Goal 3.6a - During the 2013-2022 Permit Cycle the Maine DEP identified that hydrant flushing was a potential contributor of pollutants to MS4s. The DEP published an issue profile providing water districts and departments guidance on how to meet ambient water quality standards for chlorine during hydrant flushing. The document was specifically designed for discharges to MS4s. In addition, the Maine Rural Water Association and Maine Water Utilities Association prepared a guidance document and training to show departments and districts how to meet the requirements of the issue profile.

The City previously made annual requests to the Portland Water District to provide an annual report describing their hydrant flushing dechlorination processes, and the City will continue to request that they provide the reports each year.

Measurable Goal 3.6b – If any of the following allowed non-stormwater discharges (in addition to hydrant flushing) are identified as significant contributors of pollutants to the MS4, the City will work with the responsible dischargers to control these sources so that they are no longer significant contributors of pollutants.

- Landscape irrigation
- Diverted stream flows

- Rising ground waters
- Uncontaminated ground water infiltration (as defined at 40 CFR 35.2005(20))
- Uncontaminated pumped ground water
- Uncontaminated flows from foundation drains
- Air conditioning and compressor condensate
- Irrigation water
- Flows from uncontaminated springs
- Uncontaminated water from crawl space pumps
- Uncontaminated flows from footing drains
- Lawn watering runoff
- Flows from riparian habitats and wetlands
- Residual street wash water (where spills/leaks of toxic or hazardous materials have not occurred, unless all spilled material has been removed and detergents are not used), and
- Firefighting activity runoff (hydrant flushing is addressed in MG 3.6a)
- Water line flushing and discharges from potable water sources
- Individual residential car washing
- Dechlorinated swimming pool discharges

1.4 MCM 4 Construction Site Stormwater Runoff Control

The City will update, implement and enforce its Construction Runoff Control Program for construction activities that disturb greater than or equal to one acre of land including projects less than one acre that are part of a larger common plan of development or sale as required by the 2022 MS4 General Permit through implementation of BMPs as described in this section.

The City's existing Code of Ordinances are referenced in this MCM and can be found here: Westbrook, Maine Code of Ordinances (ecode360.com)

The City's Site Plan Review process can be found in Chapter 335, Article XIII.

The following sites are required to submit a sediment and erosion control plan to the City for review and approval:

Large sites:
Any site subject to Site Plan Review is required to submit an Erosion Control Plan including details of erosion control methods used and written notes. Sites that are subject to Site Plan Review include:

- New structures, expansions, alterations or new or altered impervious cover exceeding 3,000 square feet

Small sites:
Though not required by the 2022 MS4 General Permit, small development sites that are not subject to the Site Plan Review requirement to submit an Erosion Control Plan are required to submit a Surface Drainage Plan for review. Sites must also use Best Management Practices for Erosion and Sedimentation control whenever there is the potential to discharge into the City's stormwater system. The Director of Engineering and Public Services has the authority to require additional BMPs at these sites if there is a reasonable expectation that stormwater runoff will cause erosion and lead sediment to leave the development site. These sites are subject to enforcement of Chapter 281 – Non-Stormwater Discharge.

Westbrook Ordinances can be found at: Ordinances – City of Westbrook, Maine. The following BMPs will be implemented to meet this Minimum Control Measure.

1.4.1 BMP 4.1 – Erosion Sediment Control Ordinance

Responsible Party - Planner and Director of Engineering and Public Services

Measurable Goal 4.1a – The City's Site Plan Review Procedures (specified in Chapter 335, Article XIII; 13.1-13.7 – Subdivision and Site Plan Review) already specify that any application for Site Plan Review contain an Erosion Control Plan. This requirement covers all sites that disturb one or more acres of land including projects less than one acre that are part of a larger common plan

of development or sale as required by the 2022 MS4 General Permit.

The City will review the Subdivision and Site Plan Review Ordinance by 7/1/2022 to ensure that the Erosion Control Plan meet a set of standards consistent with the applicable sections of Attachment C to the 2022 MS4 General Permit, (which are the same as the Maine DEP Stormwater Rule Chapter 500 Appendices A Erosion and Sediment Control, B Inspections and Maintenance, and C Housekeeping). If revisions to the Ordinance are necessary they will be made and a redline strikeout record of the changes will be kept on file to document the changes.

Measurable Goal 4.1b – If needed to simplify the Subdivision and Site Plan Review Ordinance revision, the City will develop either on its own, or regionally, a set of standards consistent with the construction site requirements contained in Attachment C to the 2022 MS4 General Permit, (which are the same as the Maine DEP Stormwater Rule Chapter 500 Appendices A Erosion and Sediment Control, B Inspections and Maintenance, and C Housekeeping).

The standards will include a requirement to control waste such as discarded building materials, concrete truck wash-outs, chemicals, litter and sanitary waste at the construction site that may cause adverse impacts to water quality if passed through the storm drain system.

1.4.2 BMP 4.2 – Site Plan Review Procedures

Responsible Party - Planner and Director of Engineering and Public Services

Measurable Goal 4.2a – The City's Site Plan Review Procedures will continue to be implemented and those procedures reviewed to ensure that they contain the required elements listed in the 2022 MS4 General Permit (consideration of potential water quality impacts, erosion control, waste storage, the ability for the public to comment at publicly noticed meetings and procedures to consider information submitted by the public). Any necessary revisions will be completed before 7/1/22.

1.4.3 BMP 4.3 – Procedures for notifying construction site developers and operators

Responsible Party - Planner and Code Enforcement Officer

Measurable Goal 4.3a – The City will continue notifying developers and contractors of requirements to obtain coverage under the MCGP and Chapter 500 for sites that disturb one or more acres of land using the following methods:

- Providing notices on the Planning Department and Code Enforcement Department webpages
- Requiring check box on building permit for sites that disturb one or more acres of land, and
- In discussions with applicants.

1.4.4 BMP 4.4 – Conduct and Document Construction Site Inspections

Responsible Party – Director of Engineering and Public Services

Measurable Goal 4.4a – The City will continue implementing its procedure for construction site inspections which will be formalized in a written document by 7/1/2022. The written procedure will:

- Identify that third-party inspectors conduct these inspections
- Identify that the inspector will review any inspection deficiencies with the contractor during or at the conclusion of the inspection to allow for BMP repairs to be done no later than the next workday, additional BMPs to be added within 7 calendar days, and significant repairs to be completed with 7 calendar days and prior to any storm event (rainfall) and that:
    - The inspection reports are provided to the Director of Engineering and Public Services within 3 days of the inspection for any sites that require corrective measures, and within one week for any sites that do not require corrective measures.
- Require three inspections during active earth-moving phase of construction
- Require a minimum of one inspection annually until the project reaches substantial completion.
- Require a final inspection at project completion to ensure that permanent stabilization has been achieved and all temporary erosion and sediment controls have been removed, and
- Include use of the construction inspection form provided in Appendix E of this SWMP.

Measurable Goal 4.4b. The City will document construction sites that trigger the ordinance using an excel spreadsheet each year. The spreadsheet will contain the site's name, map and lot number, dates of inspections, and any enforcement actions and corrective actions taken.

1.5 MCM 5 Post-Construction Stormwater Management in New Development/ Redevelopment

The City will continue to implement its Post Construction Stormwater Management Program to address stormwater runoff from new development and redevelopment projects that disturb greater than or equal to one acre, including projects less than one acre that are part of a larger common plan of development or sale, that discharge into the City's MS4 through implementation of the following BMPs.

The City's current Ordinances contain provisions to prevent or minimize water quality impacts from development in accordance with the requirements of the MS4 General Permit.

The following is a summary of the ordinance contents as they relate to the MCM 5 requirements:

Chapter 278, requires that:

- Preparation and implementation of a Post Construction Stormwater Management Plan in accordance with Maine DEP Guidance,
- Execution and filing of a Maintenance Agreement for any infrastructure that will remain under private control,
- Submittal of an annual report documenting that all on-site BMPs have been inspected by a qualified inspector and are either functioning as intended or if they require maintenance and repair, a list of deficiencies, and documentation once they are corrected.

The following BMPs will be implemented to meet this Minimum Control Measure.

1.5.1 BMP 5.1 – Promote strategies to prevent or minimize water quality impacts

Responsible Party - Planner and Code Enforcement Officer

Measurable Goal 5.1a – The City will rely on the Maine DEP Chapter 500 Stormwater Rules which provide stormwater treatment standards for sites that disturb one or more acres of land and are either: in the in the watershed of an Urban Impaired Stream or a lake most at risk that create 20,000 square feet of impervious cover, or in any other watershed that creates 1 acre or more of impervious cover or is in any watershed where 5 or more acres of land will be developed.

Measurable Goal 5.1b – The City's current ordinances contain general provisions to prevent or minimize water quality impacts from development. Additionally, staff works closely with developers to encourage the use Low Impact Development (LID) techniques where appropriate and viable. The City will continue this approach as well as using LID techniques in City projects to

encourage widespread acceptance of the techniques.

During the previous permit cycle, the City worked with an intern to create a Low Impact Development and Stormwater BMP Guide which we have made available to developers and the public both in print and on the City website. The City will maintain, expand and promote this resource during the 2022 MS4 General Permit cycle.

1.5.2 BMP 5.2 – Maintain Post Construction Ordinance or Similar Measure

Responsible Party - Planner and Code Enforcement Officer

Measurable Goal 5.2a – During the 2008-2013 permit cycle, the City passed a Post Construction Discharge Ordinance (Chapter 278 as described above) which requires that any site that disturbs more than one or more acres certify to the City annually by March 1 that they have inspected and maintained their stormwater BMPS. The City will continue to track:

- The cumulative number of sites that have post construction BMPs discharging into the permittee's MS4;
- The number of sites that have post construction BMPs discharging into the permittee's MS4 that were reported to the municipality;
- The number of sites with documented functioning post construction BMPs; and
- The number of sites that required routine maintenance or remedial action to ensure that the post construction BMP is functioning as intended.

Measurable Goal 5.2b – By 7/1/2023, the City's Post Construction Ordinance (Chapter 278) will be updated to state that for any sites reporting that maintenance is required:

- Deficiencies will be corrected within 60 days of identification and a record of the corrective action taken will be provided to the City Enforcement Authority within the same 60-day period.
- If it is not possible to correct the deficiency and notify the City within 60 days, the property owner will coordinate with the Enforcement Authority to establish an expeditious schedule to correct the deficiency and will provide a record of the corrective actions taken.

1.6 MCM 6 Pollution Prevention/Good Housekeeping for Municipal Operations

The objective of this MCM is to mitigate or eliminate pollutant runoff from municipal operations on property that is owned or managed by the permittee and located within the 2000-2010 Urbanized Area through implementation of the following BMPs.

1.6.1 BMP 6.1 – Operations at Municipally Owned Grounds and Facilities

Responsible Party – Director of Engineering and Public Services

Measurable Goal 6.1a – During the previous MS4 permit cycle, the City developed an inventory of municipal operations conducted in, on, or associated with facilities, buildings, golf courses, cemeteries, parks and open space owned or operated by the City that have the potential to cause or contribute to stormwater pollution. The City will review and update its inventory annually.

Measurable Goal 6.1b – During the previous MS4 permit cycle, the City developed and implemented Operation and Maintenance (O&M) Procedures for the municipal operations listed in their inventory that had the potential to cause or contribute to stormwater pollution. The City will continue to implement these O&M Procedures and will review and update the O&M Procedures annually to iteratively improve strategies and practices to eliminate or better control pollutant discharges.

1.6.2 BMP 6.2 – Training

Responsible Party – Director of Engineering and Public Services

Measurable Goal 6.2a – The City will conduct annual training as follows:

a. Train the Public Services staff including wastewater and fields crews as well as School Department Fleet Maintenance staff on SWPPP procedures and related SOPs. This will include a pre and post training quiz to evaluate training effectiveness. A minimum of 80% of the staff described above will receive training.
b. All new employees within the Public Services staff as described above will receive SWPPP and SOP training within 30 days of hire.

1.6.3 BMP 6.3 – Continue Street Sweeping Program

Responsible Party – Director of Engineering and Public Services

Measurable Goal 6.3a - Each permit year the City will continue to sweep all publicly accepted paved streets and publicly owned paved parking lots at least once a year as soon as possible after snowmelt.

1.6.4 BMP 6.4 – Cleaning of Catch Basins

Responsible Party – Director of Engineering and Public Services

Measurable Goal 6.4a – The City will inspect its catch basins for sediment content at least once every two years but the City will continue to attempt to inspect each catch basin annually if time and municipal budget allows and will clean catch basins that accumulate more than three inches of sediment.

Measurable Goal 6.4b – The City will track which catch basins accumulate excess sediment (i.e., more than 50% of the sump contains sediment) to ensure those basins are inspected again the following year and cleaned if necessary. If a catch basin exhibits less than 25% sediment in its sump for two consecutive years, it is removed from the excess sediment list, and can be inspected again every two years.

Measurable Goal 6.4c – The City will continue to beneficially re-use any catch basin grit that does not exhibit evidence of sewage, oil/grease, litter, or other pollutants in accordance with Maine DEP Solid Waste Management Rule 418 Beneficial Use of Solid Waste. Grit that exhibits evidence of pollutants will be profiled to assess its waste classification and disposed of at an appropriately licensed solid waste facility.

1.6.5 BMP 6.5 – Maintenance and Upgrading of Storm water Conveyances and Outfalls

Responsible Party – Director of Engineering and Public Services

Measurable Goal 6.5a – The City will maintain and upgrade the stormwater conveyance systems based on the results of the catch basin, outfall, and ditch inspections, in accordance with the urgency of any needed repairs or maintenance. The City continues to perform systematic capital upgrades of the storm drain system in correlation with the road paving program for the City. The City's proprietary stormwater treatment systems are inspected by municipal staff and maintained by a contracted third party.

1.6.6 BMP 6.6 – Stormwater Pollution Prevention Plans (SWPPPs)

Responsible Party – Director of Engineering and Public Services

Measurable Goal 6.6a – During the last Permit Cycle, the City prepared a SWPPP for the Public Services Facility. The City will amend the SWPPP to comply with the requirements specified in Part IV.C.6.d by 6/30/2022. In addition, the City will amend the SWPPP within 30 calendar days of completion of any of the following:

- A change in design, construction, operation, or maintenance that may have a significant effect on the discharge or potential for discharge of pollutants including the addition or reduction of industrial activity,

- Monitoring, inspections, or investigations by the City, local, state or federal officials which determine the SWPPP is ineffective in eliminating or significantly minimizing the intended pollutants,

- A discharge occurs that is determined by the Maine DEP to cause or have the reasonable potential to cause or contribute to the violation of an applicable water quality standard.

Measurable Goal 6.6b - The City will implement the plan throughout each Permit Year including conducting quarterly facility inspections using the City's own form and visual monitoring using the forms containing the inspection criteria identified in Appendix E of the 2022 MS4 General Permit.

1.7 Impaired Waters BMPs

The City's MS4 includes point source discharges to Capisic Brook and Nasons Brook both of which are classified as an Urban Impaired Streams in Maine DEP Rule Chapter 502. Westbrook also has MS4 point source discharges to the Stroudwater River which was recently categorized as impaired though it does not have a TMDL at this point. Details of the work completed to date in these watersheds are contained in Section 1.4 of this SWMP, and set the framework for identification of the three BMPs that will be implemented to meet the Urban Impaired Stream requirement of the 2022 MS4 General Permit.

1.7.1 BMP 7.1 – Minimize Chloride Contributions to Capisic Brook and Nasons Brook

Responsible Party – Director of Engineering and Public Services (with implementation assistance from Cumberland County Soil & Water Conservation District)

As described in Section 1.4 of the Municipality's SWMP, chlorides have been identified as a stressor of the Urban Impaired Stream(s) that receive MS4 discharges.

The Municipality has already taken several actions over the past few years to minimize their chloride contributions during deicing, will continue to implement the following chloride reduction practices which are also specified in the Maine BMP Manual for Snow and Ice Control, 2015:

- Annual review of appropriate application rates with crew at beginning of winter season
- Use of Ground Speed Control and Annual Equipment Calibration to ensure proper application rates
- Recalibration of equipment whenever major repairs are made
- Use of pavement temperature gauges to determine application rates
- Use of multi-section blades that adhere to shape of roads (or other kind of blade)
- Pretreatment of roads with brine when appropriate
- Use of liquid (prewetting) to improve performance and to reduce "bounce and scatter" when applying sodium chloride, and
- Use of road weather information cameras/sensors, real time conditions.

In addition, although there are two regional pilot programs beginning in 2021 which target chloride reduction by private applicators, there is still a need for a statewide program, additional public education around chlorides, and limited liability legislation for private applicators.

The Municipality will implement the following Measurable Goals related to chloride reduction in both Capisic Brook and Nasons Brook.

Measurable Goal 7.1a. At least one representative from the Municipality will attend an annual regional training or roundtable to learn about new chloride reduction techniques coordinated by the ISWG or another organization.

Measurable Goal 7.1b. The Municipality will complete the following actions to facilitate future reduction of chlorides through application by private contractors:

- In Permit Year 1, and alternating years thereafter until it passes, the Municipality will provide educational outreach regarding limited liability legislation to legislators and at least two other organizations representing firms that conduct application of chloride on private property. The Municipality will also provide comments on any drafted legislation, and provide testimony at the committee level once drafted to help inform the review committee. The information provided will identify how chlorides affect water quality and how limited liability legislation will support a training, data collection, and certification program like the New Hampshire "Green Snow Pro" program or Minnesota's Smart Salting Training Program for private applicators.
- In years when limited liability legislation has not passed and is not active for procedural reasons, the Municipality will provide winter maintenance education and outreach to the public. The messaging will be delivered using two tools per year selected from Appendix D.
- Should the legislation be successful:
    - The first year after it passes, the Municipality will provide awareness of its passage in the form of a presentation to the Select Board/Council.
    - Beginning the second and subsequent years after passage, the Municipality will educate property owners/managers, private contractors, and/or the public on winter maintenance practices to maintain public safety and protect the environment. These practices will be delivered using two tools per year selected from Appendix D.

1.7.2 BMP 7.2 – Conduct Enhanced Outreach to Commercial and Industrial Property Owners in Capisic Brook and Nasons Brook watersheds

Responsible Party – Director of Engineering and Public Services

The City will implement enhanced outreach to commercial and industrial property owners in the Capisic Brook and Nasons Brook watersheds. The outreach will focus on the financial costs property owners incur due to excess salt application and the potential cost savings to be realized while maintaining safe conditions. The City of Westbrook will partner with the City of Portland on outreach in the Nasons Brook watershed.

Measurable Goal 7.2 – Implement the following outreach, conductivity testing and reporting in the Capisic Brook and Nasons Brook watersheds. The steps below are written to include Portland and reference Nasons Brook. To reduce repetition, assume Westbrook will be conducting the same program in the Capisic Brook watershed concurrently.

Year 1: The cities of Portland and Westbrook will work collaboratively to develop a Salt Reduction Outreach Plan for commercial and potentially industrial and residential property

owners in the Nasons Brook watershed. Additionally, the cities will determine conductivity testing sites and protocols for the watershed. Conductivity testing will begin in fall 2022 to establish baseline conductivity.

Year 2: Portland and Westbrook enact the Salt Reduction Outreach Plan

Year 3: Portland and Westbrook continue enacting the Salt Reduction Outreach Plan, conduct conductivity testing based on the protocols established in Year 1 and submit a progress report in their Stormwater Annual Report

Year 4: Portland and Westbrook enact the Salt Reduction Outreach Plan

Year 5: Portland and Westbrook conduct conductivity testing following the Year 1 protocol and submit a Collaboration Final Report in their Stormwater Annual Report

1.7.3 BMP 7.3 – Development of a Municipal Ordinance Requiring all Development and Redevelopment in the Capisic Brook and Nasons Brook Watersheds to Improve the Quality of Stormwater Runoff from the Site.

Responsible Party – Director of Engineering and Public Services

Measurable Goal 7.3 – The City of Westbrook will develop a local ordinance requiring all development and redevelopment in the heavily developed Capisic Brook and Nasons Brook watersheds to improve the quality of stormwater runoff from the site. Due to the high salt runoff in these watersheds, the ordinance will include conductivity as a water quality metric but will also consult with the DEP to ensure the ordinance targets all appropriate pollutants. The DEP will also be consulted on the best approach to measure the effectiveness of this BMP.

2 GENERAL REQUIREMENTS

2.1 Certification

The General Permit requires that this Plan be certified by either a principal executive officer or ranking elected official. This section provides the necessary 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 gathered and evaluated 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."

Signature:  Date: 3/31/21

Michael Foley

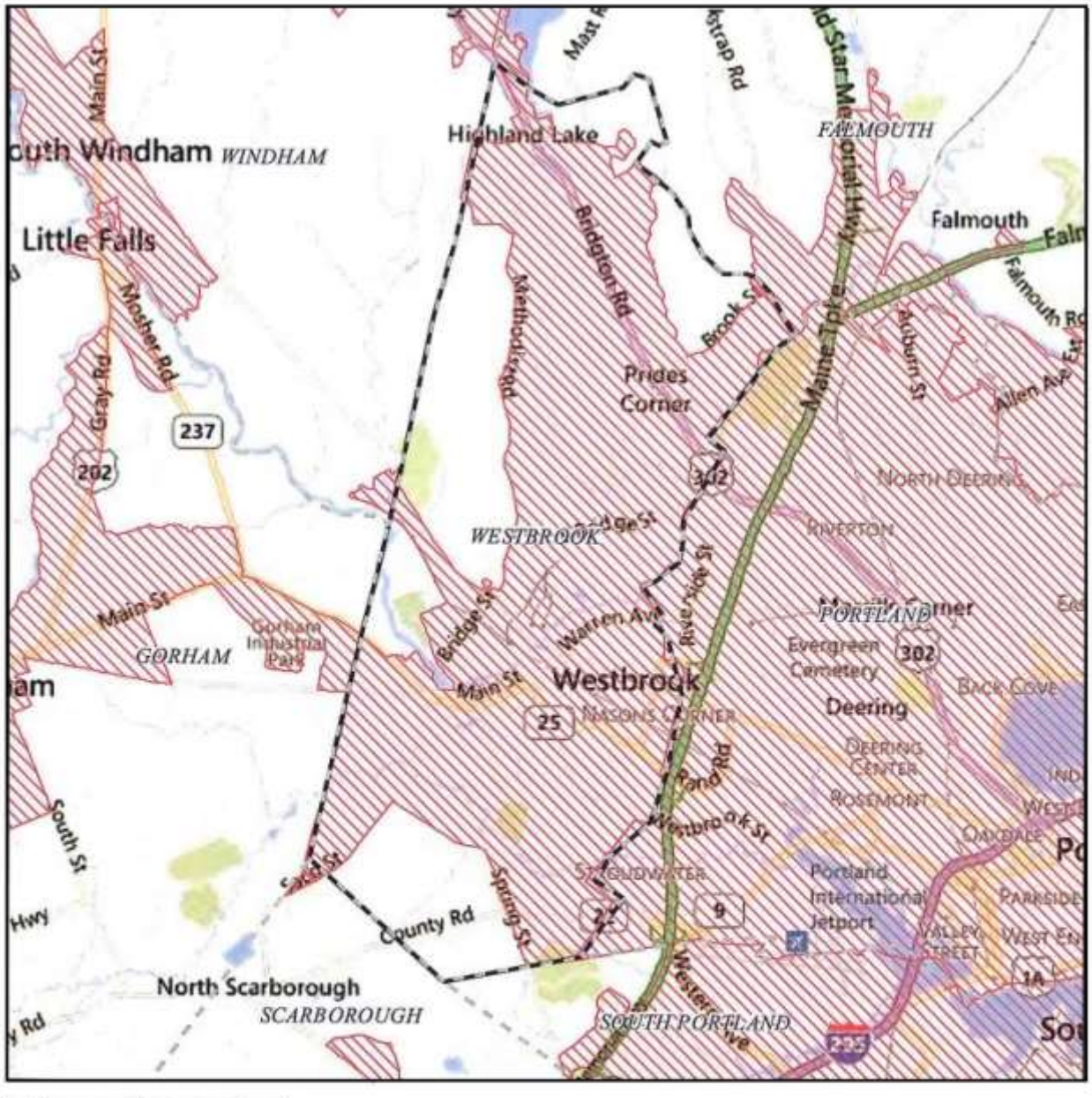
Title: Mayor

APPENDIX A

URBANIZED AREA MAP

City of Westbrook

Urbanized Area Map



NPDES Phase II Stormwater Program
Automatically Designated MS4 Areas

Westbrook ME

Regulated Area (2010 Urbanized Area)

0 1 2 3 4 5 Kilometers
0 1 2 3 4 Miles

Town Population: **17417**
Regulated Population: **16649**
(Populations estimated from 2010 Census)

EPA DRAFT

Urbanized Areas: US Census Bureau (2010)
Town Boundaries: NAVTEQ
Base map © 2009 Microsoft Corporation and its data suppliers

US EPA Region 1 GIS Center Map #6538, 6/26/2012

APPENDIX B

NOTICE OF INTENT and PERMITTEE SPECIFIC DEP ORDER

NOTICE OF INTENT TO COMPLY WITH MAINE GENERAL PERMIT FOR THE DISCHARGE OF STORMWATER FROM MUNICIPAL SEPARATE STORM SEWER SYSTEMS (MS4)

PLEASE TYPE OR PRINT IN *BLACK INK ONLY*

PERMITTEE INFORMATION					
MS4 Entity	City of Westbrook			Permittee ID #	MER041002
Name and title of chief elected official or principal executive officer	Michael Foley, Mayor				
Mailing Address	2 York St				
Town/City	Westbrook	State	Me	Zip Code	04092
Daytime Phone	207-854-9105	Email	mfoley@westbrook.me.us		
PRIMARY CONTACT PERSON FOR OVERALL STORMWATER MANAGEMENT PROGRAM (if different than PEO/CEO)					
Name and Title	Lynn Leavitt				
Mailing Address	371 Saco St				
Town/City	Westbrook	State	Me	Zip Code	04092
Daytime Phone	207-591-8135	Email	lleavitt@westbrook.me.us		
STORMWATER MANAGEMENT PLAN (SWMP)					
Urbanized Area (sq. mi.)	13.7				
I have attached our updated SWMP with ordinances, SOPs, forms. ☑					
Name of streams, wetlands, or waterbodies to which the regulated small MS4 discharges (*attach additional sheets as necessary*): Presumpscot River, Mill Brook, Stroudwater River, Highland Lake, Minnow Brook, Nasons Brook, Capisic Brook, Long Creek					
List of impaired waterbodies that receive stormwater from the regulated small MS4 (*attach additional sheets as necessary*): Capisic Brook, Nasons Brook					

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.

Signature of Permittee		Date	3/31/21

This NOI registration form must be filed with the Department at the following address:

Stormwater Program Manager
Maine Department of Environmental Protection
Bureau of Water Quality
17 State House Station
Augusta ME 04333-0017
Rhonda.Poirier@maine.gov

OFFICE USE ONLY							
Date Recieved		Staff		Date Accepted		Date Not Accepted	

City of Westbrook

City Hall • Westbrook, ME 04092 • (207) 854-0636 • Fax (207) 854-0639

LEGAL NOTICE

This City of Westbrook will file a Notice of Intent (NOI) to comply with the Maine General Permit for the Discharge of Stormwater from Small Municipal Separate Storm Sewer Systems issued 10/15/2020 (MER041000 W009170-5Y-C-R) and an associated Stormwater Management Plan (SWMP) with the Maine Department of Environmental Protection. This NOI and SWMP will be filed by March 31, 2021.

A copy may be seen at the City of Westbrook Public Services Department and on the municipal website at http://westbrookmaine.com/170/Stormwater-Compliance. The DEP will review the submittal and assess if it is complete for processing within 60 days of submittal. Once it has been deemed complete for processing, it will be made available on the Maine DEP website for 30-day public comment: www.maine.gov/dep/comment/index.html.

A request for public hearing or request that the Board of Environmental Protection assume jurisdiction over this application must be received by the DEP, in writing, no later than 20 days after the application is found acceptable for processing. Requests must indicate the interest of the person filing the request and specify the reasons why a hearing is warranted. Unless otherwise provided by law, a hearing is discretionary and may be held if the Commissioner or the Board finds significant public interest or there is conflicting technical information.

The NOI and SWMP are also available for viewing at the DEP Office in Augusta by scheduled appointment during normal business hours during the pandemic. Written public comments or requests for information may be made to the Division of Water Quality Management, Department of Environmental Protection, State House Station #17, Augusta, ME 04333-0017; telephone (207)592-6233 and must include the name of the municipality filing the NOI and the Permit number provided above.

American Journal - 3/25/21

APPENDIX C

SUMMARY OF PUBLIC COMMENTS RECEIVED

APPENDIX D

EDUCATION & OUTREACH TOOLS, LEVELS OF EFFORT AND EFFECTIVENESS BENCHMARKS

Below is a list of tools with their corresponding minimum level of effort and effectiveness benchmark that will be selected from each year to implement BMP 1.1 and 1.2.

Outreach Tool	Minimum Level of Effort	Effectiveness Benchmark
Poster	10 posters/municipality	Total number of posters distributed
Flyer	1 flyer	Total number of flyers distributed
Brochure	1 brochure	Total number of brochures distributed
Rack Card	1 rack card	Total number of rack cards distributed
Newsletter Article	2 newsletter articles	Total number of newsletters distributed
Post Card	1 post card	Total number of postcards distributed
Factsheet	1 factsheet	Total number of factsheets distributed
Sign	5 signs/municipality	Total number of signs distributed
Story Walk	1 story walk	Number of QR code (or similar technology) scans from signs
Story Map	1 regional story map	Number of visitors to webpage
Stormwater Geocaching	1 regional activity (14 sites)	Number of participants per site
Augmented Reality App	1 regional activity (14 sites)	Number of app downloads Number of engagements within the app
Municipal Electronic Message Board	3 messages	Amount of time message was displayed
Email Newsletter	4 email newsletters	Number of people reached with email Number of interactions with email (e.g., link clicks)
Municipal Website Content	Annual updates to website stormwater content	Number of visitors to stormwater webpage(s)
Think Blue Maine Website Content	Semiannual updates to website content	Number of visitors to website
Social Media Post (each platform counts as separate tool)	12 posts	Amount of post engagement (e.g., reactions, comments, shares, etc.)
Social Media Ad (each platform counts as separate tool)	Ad(s) run 90 days (multiple ads may be run for shorter durations to total 90 days)	Amount of ad engagement (e.g., reactions, comments, shares, link clicks, etc.) Number of people reached with ad
Social Media Video (each platform counts as separate tool)	3 videos	Amount of video engagement (e.g., views, reactions, comments, shares, etc.)
Online ad	Ad(s) run 90 days (multiple ads may be run for shorter durations to total 90 days)	Number of people reached with ad Amount of ad engagement (e.g., link clicks)
Radio Ad	1 radio ad	Number of people reached with ad

Radio Segment	1 radio segment	Number of people reached with segment
Television Ad (broadcast or streaming)	1 television ad	Number of people reached with ad
Television News Segment (broadcast or streaming)	1 television news segment	Number of people reached with segment
Newspaper Article	1 newspaper article	Number of people reached with article
Newspaper Ad	1 newspaper ad	Number of people reached with ad
Webinar/Workshop	7 hours of training offered (multiple webinars/workshops may be offered to reach 7 hours)	Number of workshop attendees
Social Gathering	3 events	Number of interactions
Tabling	3 events	Number of interactions
Outreach partnership with local retailer	50% of industry retailers in region participating	Number of local retailers participating
Outreach partnership with local organization	3 content shares by partner organization	Number of people reached
Item with branding/messaging	1 item with branding/messaging	Total number of items distributed
A DEP-approved tool	Minimum level of effort will be determined based on the tool	Effectiveness benchmark will be determined based on the tool

APPENDIX E

IDDE PLAN AND QAPP

Attached as a Separate File for Email

APPENDIX F

CONSTRUCTION INSPECTION FORMS

CITY OF WESTBROOK, ME

EROSION AND SEDIMENT CONTROL INSPECTION REPORT FOR CONSTRUCTION SITES AN ACRE OR GREATER

Inspection Date:
Project Address / Location:
Map / Lot:
Project in Shoreland Zone[1]: ☐ Y ☐ N
Property Owner:
Excavation Contractor:
DEP ESC-certified contractor?[1] ☐ Y ☐ N ☐ N/A
Weather / Temp:

Project Type:
Inspection Duration:
Inspector:
Inspector Qualifications:
Owner Contact Info:
Contractor Contact Info:
Photos: ☐ Y ☐ N
Date & inches last precip:

Inspection Criteria[2]	Inspection Result[3]								Observations / Corrective Actions Needed
E&SC Plan On Site		N/A		M		P		F	
Contractor ESC Log Up to Date		N/A		M		P		F	
Winter Stabilization (11/1 – 4/15)		N/A		M		P		F	
Culverts / Inlet-Outlet Protection		N/A		M		P		F	
Detention / Sediment Ponds		N/A		M		P		F	
Dewatering Area		N/A		M		P		F	
Ditches / Swales / Channels		N/A		M		P		F	
Dust Control		N/A		M		P		F	
Gabions		N/A		M		P		F	
Hay Bales		N/A		M		P		F	
Level Spreader		N/A		M		P		F	
Material Storage Areas		N/A		M		P		F	
Mats / Mulches / Blankets		N/A		M		P		F	
Riprap Slope Stabilization		N/A		M		P		F	
Silt Fencing / Silt Sock		N/A		M		P		F	
Solid Waste / Hazardous Materials		N/A		M		P		F	
Stabilized Construction Entrance		N/A		M		P		F	
Stone Check Dam		N/A		M		P		F	
Storm Drain Inlet Protection		N/A		M		P		F	
Topsoil Stockpile		N/A		M		P		F	
Vegetated Buffers		N/A		M		P		F	
Vegetated Stabilization (seed/sod)		N/A		M		P		F	
Wood Waste Bark Filter Berms		N/A		M		P		F	
Other Stormwater Controls		N/A		M		P		F	

*1. Contractor **MUST BE** certified by DEP in ESC if working within 250' of a river, coastal or freshwater wetland; or 75' of stream.*
2. Refer to Maine Erosion & Sediment Control BMPs
3. N/A = Not Applicable; M = Maintenance Needed; P = Pass; F = Fail

Additional Comments (including any deviations from ESC plan, recommendations for improvements to contractor, and remedial actions needed):

Remedial Actions Needed? ☐ Y ☐ N

Expected Completion Date:

Contractor Signature