

March 9, 2011

EPA – Region 1
Attn: Kate Renahan
Office of the Regional Administrator
5 Post Office Square, Suite 100
Mail Code: ORA01-1
Boston, MA 02109-3912

Subject: Comments on the Draft Massachusetts Interstate, Merrimack and South Coastal Small MS4 General Permit

Dear Ms. Renahan:

The City of Haverhill (“the City”) is in receipt of the Draft Massachusetts Interstate, Merrimack and South Coastal Small MS4 General Permit for stormwater management. This letter provides our comments for consideration when developing the final permit. Please note that these comments within are in addition to comments submitted on behalf of the City by Kopelman and Paige, P.C. under separate cover.

The regulatory agencies and the regulated communities share a common mission – to ensure the health and quality of our cities and towns and their natural resources. In order to accomplish these goals, environmental programs must be balanced with other needs and responsibilities of each community and implemented in a fashion that is both feasible and financially responsible. In this context, we offer the following comments on the Draft Permit:

Financial Burden to City of Haverhill

We anticipate that the Stormwater Permit will cost the City of Haverhill nearly **\$5,400,000 over the 5-year permit to comply with all the requirements therein**. For example, the Draft Permit requires sampling of the outfalls that discharge to waters of the United States. The City has 604 outfalls. To deal with these outfalls through Minimum Control Measure # 3, Stormwater Illicit Discharge Detection and Elimination could cost up to **\$294,000** annually. This is just one small component of the Draft Permit. Combined with the labor and consulting fees required to develop and distribute public education materials, to conduct illicit discharge detection and elimination investigations, to complete data and mapping requirements, to inventory and inspect municipal facilities, to inspect and enforce construction activities, to review site plans for proposed new development or redevelopment projects, and to develop and implement reports, policies and ordinances, the financial burden of the Draft Permit is excessive.

The Fact Sheet for the Draft Permit addresses the Unfunded Mandates Reform Act (UMRA). UMRA requires Federal agencies to assess effects of regulatory actions on tribal, state, and local governments and the private sector. UMRA defines “regulatory actions” to include proposed or final rules with Federal mandates. The Fact Sheet indicates that the Draft Permit is not considered a rule and is not subject to the requirements of UMRA. The EPA justified that the original 1999 Final Rule that created the NPDES Phase II program (FR Doc. 99-29181) as not an unfunded mandate and, accordingly, has not provided any direct financial assistance for this program since then. The City disagrees that the 1999 Final Rule is not an unfunded mandate, and because the Draft Permit is an extension of the 1999 Final Rule, the new Draft Permit is also

an unfunded mandate. Compared to the 1999 Final Rule, the Draft Permit has many additional costly requirements. The enclosed City of Haverhill analysis of what we feel it will take to comply with the new stormwater permit indicates that the Stormwater Permit will cost the City over **\$1,200,000 for permit year one** and over **\$5,400,000 over the 5-year permit to comply**. The City hereby requests that the Federal government provide direct financial assistance regarding this permit or reduce the scope of the Draft Permit.

Furthermore, in Section 1.10 c, the permittee is “encouraged to maintain an adequate funding source for the implementation of this program. Adequate funding means that a consistent source of revenue exists for the program.” With only 120 days from the permit’s authorization date to develop the Stormwater Management Plan and commit to particular measures for implementation, there is not adequate time for funding to be secured. In addition, a “consistent source of revenue” implies a funding mechanism such as a stormwater utility. Although the City of Haverhill is exploring options to implement a stormwater utility, this type of program requires years to develop and implement, normally requiring multiple levels of review, public hearings, and approval from Haverhill City Council. At a time when communities are not flush with money, and when most communities do not have enterprise funds for addressing stormwater infrastructure needs, the financial obligations of the proposed regulations are insurmountable. Therefore, the City requests that it be allowed the entire length of the permit cycle to comply with this requirement.

Notice of Intent (NOI)/Stormwater Management Program (SWMP)

The Draft Permit requires the submission of the NOI within 90 days of the effective date of the permit in order to receive authorization to discharge under the permit. Once authorization from EPA is granted, the SWMP must be completed within 120 days. Preparation of these documents will require assistance from an engineering consulting firm. However, because of City and state procurement requirements, seeking out and selecting a consulting firm to complete these documents within the required time-frames is not feasible. We suggest extending the submission of the NOI to 180 days from the effective date of the permit and then completion of the SWMP within one (1) year following receipt of authorization.

Increased Discharges to Impaired Waters without an Approved TMDL

The Draft Permit requires a permittee to identify and estimate a load for each pollutant in the increased discharge for which the receiving water is impaired and implement additional BMPs to assure that the increased discharge is not causing or contributing to a water quality standards violation. It places additional burden and financial cost upon the City to determine pollutant loads in increased discharges. Dry weather screening and the wet weather monitoring of

outfalls should be sufficient to meet water quality standards. Therefore, the City requests that this requirement be eliminated from the permit.

Outfall Inventory

The Draft Permit requires that each outfall be labeled in the field with a unique identifier. The City has identified over 600 outfalls. A Global Positioning System (GPS), reading which captures the latitude and longitude for all outfalls, along with the mapping requirements, should be sufficient to locate each outfall in the field. Accordingly, the requirement to individually label outfalls in the field should be eliminated.

Illicit Discharge Detection and Elimination (IDDE) Program

The City has completed most of the mapping requirements in the Draft Permit. Nevertheless, the requirement to delineate the drainage system into catchments and then evaluate each catchment for potential illicit discharges within one (1) year of the permit effective date is unrealistic. Within that year, the City is being required to identify catchments that are known "Problem Catchments" and then rank each delineated catchment not designated as "Problem Catchments" as "high", "medium" or "low" based on numerous factors. With over 600 outfalls, this will be a time-consuming and costly task for the City. Therefore, the City suggests completion of the mapping and prioritization of the catchments within three (3) years of the permit effective date.

In addition, the City is tasked with establishing a written protocol that identifies responsibilities for eliminating illicit discharges within one (1) year from the effective date of the permit. Combined with the mapping and catchment prioritization requirements, this task places additional burden on the City.

Lastly, the IDDE investigation and elimination schedule is too aggressive. By the end of year 3, a minimum of one-half of the Problem Catchments and catchments identified as "high" or "medium" must be investigated. By the end of the permit term, 100 percent of these areas must be investigated. Within seven (7) years of the effective date of the permit, all catchment areas ranked as "low" must be investigated. Given the high number of catchments and the cost associated with performing these investigations, we suggest completion of all investigations within ten (10) years of the effective date of the permit. The Draft Permit also requires the elimination or appropriate enforcement actions of a confirmed illicit discharge no later than 6 months after confirmation. Because of procurement laws, seeking out and selecting a consulting firm to assist the City in the elimination of an illicit connection will not be feasible within that time frame. The City suggests the Draft Permit provide one (1) full year to eliminate or commence an enforcement action to eliminate the illicit connection.

Outfall Monitoring

The monitoring of 25% of outfalls each year in both wet and dry weather conditions is cumbersome, costly, and unreasonable. Currently, the City has over 604 stormwater outfalls; with a 25% sampling rate, the City would need to sample up to 150 outfalls during dry and wet weather. Dry weather monitoring should be sufficient to identify an illicit connection. The City suggests removing the wet weather requirement or scaling back the dry and wet weather screening program to a more achievable level, such as 10% per year, starting with known problem areas.

In addition, the Draft Permit requires that if no dry weather flow is observed at the outfall, but evidence of flow exists, the outfall shall be revisited during dry weather within one week of the initial observation, if practicable. EPA needs to provide some guidance for the meaning of “no flow is observed, but evidence of flow exists.” How does the City distinguish evidence of normal stormwater flow from evidence of dry weather flows? The EPA should clarify.

Sanitary Sewer Overflows

Sanitary Sewer Overflows SSO should not be in a MS4 permit. The definition of MS4 is Municipal **Separate** Storm Sewer System. Nowhere in this definition is there any reference to a “**Sanitary** sewer.” Furthermore sanitary sewer overflows do not exist in a separate sewer system. No where in the 33 U.S.C or 40 CFR 122 is there a mention regarding SSO except for Wastewater Treatment Plant see 314 CMR 12.03(8).

Infrastructure Operations and Maintenance

Catch Basins

The Draft Permit requires the permittee to optimize catch basin inspection and cleaning such that the catch basins are no more than 50 percent full. The City currently has mapped nearly

4,000 catch basins thus far, but we estimate there may be as many as 10,000 catch basins within Haverhill. The additional cost to inspect and clean all catch basins according to the permit cycle is estimated to be over \$557,000. We therefore request that just 20% of our catch basins be inspected and cleaned during the permit cycle.

Street Sweeping

The Draft Permit requires streets to be swept and/or cleaned a minimum of twice per year, once in the spring (following winter activities) and once in the fall (leaf clean up). The City currently has over 452 lane miles of streets. Currently, the City only sweeps streets with the most debris from sanding operations during the winter months.

The projected cost to sweep the streets is estimated to be \$244,000. This is yet another example of EPA adding additional burdens to the City for this unfunded mandate. We request that the EPA drop this request in the permit.

Stormwater Structures

Lastly, the Draft Permit requires all City-owned stormwater structures, such as swales; retention/detention basins or other structures, be inspected annually at a minimum. As there has been no requirement to date to inspect stormwater structures, it is unknown how many swales and retention/detention areas are currently installed within the City. However, we anticipate this task to be very time consuming based upon a preliminary review of this situation. Over the 5-year permit period this could potentially cost upwards of \$ 50,000.00 to complete this requirement. We request that this requirement be eliminated and instead the City will commit to locating and inspecting all the city-owned structures by the end of the permit cycle.

Floor Drains

The Draft Permit requires the development of an inventory of all floor drains within all City-owned buildings within one (1) year of the effective date of the permit. Identifying all floor drains in City-owned facilities and their connectivity within a year is a requirement that the City will not be able to meet. This is an extensive task that will take much longer than a year. For example, the City has 18 schools and these activities need to be done when school is not in session. The City suggests the deadline be extended to be within five (5) years of the effective

date of the permit. With 40 City owned buildings and reduced staff, this is another example of burdensome (est. \$50,000) unfunded mandate to the City.

The permit also requires that all floor drains not be connected to the drainage system. The City disagrees with this requirement. A spill prevention control plan for City-owned facilities that have floor drains should be sufficient for protecting the drainage system. Requiring disconnection of floor drains is another example of a burdensome cost to the City.

Foundation Drains

In the Fact Sheet, EPA requested comments on potential pollutants in discharges from foundation drains. The purpose of a foundation drain is to collect rainwater so that basements do not become flooded. Foundation drains are located below the basement floor, away from potential sources of pollution. It is doubtful that foundation drains are a source of pollution and the City is aware of no documentation to the contrary.

Assistance from the Regulatory Agencies

There are several areas in which the regulatory agencies could provide information that would greatly reduce the financial burden and time constraints imposed by the Draft Permit, as described below. As much as possible, the regulatory agencies should provide guidance documents and templates to meet the individual requirements of the permit.

Public Education Materials

For the required public education materials, having each community create their own language and graphics for brochures, websites, signs, etc. is an inefficient use of resources. Enough of the information on non-structural controls implementable by the public is generic and can be provided in a series of templates to communities. A few versions of this information could be developed depending on the size and demographics of each community or depending on the watershed. Similarly, for business and industrial user education, much of the information is generic and applies to all facilities. Specific recommendations regarding pet waste management, the use of alternative fertilizers, appropriate fertilizer application, and yard waste recycling, to name a few, are common to most locations. Templates could include areas where communities can input information specific to their locations. This would greatly reduce duplicate efforts and costs.

Ordinances and Policies

Similar to public education materials, the regulatory agencies should provide suggested language for ordinances and policies. The Draft Permit requires the development of a number of specific policies and procedures, including those relating to illicit discharges, construction

oversight, new development reviews, and management of municipal facilities. Again, much of this information is generic and could be provided to communities as a range of templates. Furthermore, many communities are likely to have counsel review new bylaw language prior to its adoption. If the regulatory agencies provide only that language that has been reviewed from a legal perspective and is deemed appropriate and enforceable, this would further reduce the costs to the City.

Other Comments

The following is a list of miscellaneous comments that apply to topics other than those discussed above:

- The definition of a “New Discharger” states, in part, that the discharges did not begin at a particular site prior to August 13, 1979. However, the Fact Sheet states that it would be reasonable for a community to use the effective date of the permit, rather than August 13, 1979, in determining whether a new discharge should be treated as a new discharger. This is a more reasonable approach in defining a “New Discharger” and we recommend that the language “prior to August 13, 1979” be removed from the Draft Permit.
- The requirement to annually estimate changes in the number of acres of impervious area (IA) and directly connected impervious area (DCIA) tributary within the City will be time-consuming and add a financial burden to the City. This requirement should be removed from the permit, or alternatively, be required just in year 1 and year 5 of the permit.
- Section 5.1.5 states that “EPA or MassDEP may require the permittee to add, modify, repair, replace or change BMPs or other measures” at any time. This is open-ended and onerous. More specific allowances should be made for how long a community will be given to make changes if they are requested or required by the regulatory agencies. Please be reminded that the City budgets its expenses on an annual bases. Thus if EPA requires additional BMP’s or changes after the budget is completed, additional funding must wait until the start of the next budget cycle.
- The requirements for construction site stormwater runoff control represent an improvement over the present General Construction Permit. Enforcement is often lacking with the present program, and having communities more involved with construction within their limits should help to mitigate the impacts of construction-related erosion and sedimentation. There could be a substantial reduction in pollutants from this alone, and the requirements appear to be reasonable and achievable.

- Similarly, post-construction stormwater management from new development and redevelopment are also “low-hanging fruit.” The application of the existing DEP stormwater management standards to upland areas outside of the Massachusetts Wetlands Protection Act jurisdiction, which results in two or more acres of impervious surfaces, is appropriate. These are standards that have been implemented in and around wetland resource areas for a number of years and are tested, implementable, and enforceable.

In conclusion, the Draft Permit as presented includes several requirements which are not achievable and do not take into account time and budget constraints that affect cities and towns. The permit should be scaled back to include achievable, cost-effective goals during the course of the five-year permitting period. The final permit should present a means of building upon previous efforts to achieve continuous improvements to water quality in a rational, feasible manner and cost effective manner.

Enclosed for your review is a spreadsheet which illustrates the potential costs to comply with the requirements for permit year one for the City of Haverhill, as well as the projected 5-year cost to the City to maintain compliance. Additionally, attached hereto and incorporated by reference as if fully set forth herein are the “Comments on the Draft Massachusetts Interstate, Merrimack, and South Coastal Small MS4 General Permit” (dated February 22, 2011).

Thank you for your consideration of these comments. Should you have any questions, please contact Mr. Michael Stankovich, Haverhill DPW Director, at (978) 420-3815.

Very truly yours,

James J. Fiorentini

James J. Fiorentini
Mayor City of Haverhill

cc: The Honorable John F. Kerry, U.S. Senator
The Honorable Scott Brown, U.S. Representative
The Honorable Niki S. Tsongas, U.S. Representative

STORMWATER WORK ACTIVITIES FOR THE 6 MINIMUM CONTROL MEASURES	New Permit Requirement (Days)	Cost to Implement Year One	Cost to Implement Year Two	Cost to Implement Entire Permit
Notice of Intent and SWMP				
Preparation and submission of Notice of Intent	7.5	\$7,200		\$7,200
Preparation and submission of SWMP	15	\$14,400		\$14,400
Sub Total:	23	\$21,600	-	\$21,600
Minimum Control Measure 1: Public Education and Outreach				
	New Permit Requirement (Days)	Cost to Implement Year One	Cost to Implement Year Two	Cost to Implement Entire Permit
Distribute a minimum of two (2) educational messages to each of the four audiences identified in Part 2.4.2.1(a). The educational program shall include education and outreach efforts for the following four (4) audiences: (1) residents, (2) businesses, (3)				
Develop educational material	3	\$2,160		\$2,160
Distribute 2 educational messages to the four targeted group	3	\$2,160	\$2,160	\$10,800
Minimum Control 1 Sub Total:	6	\$4,320	\$2,160	\$12,960
Minimum Control Measure 2: Public Participation /Involvement				
	New Permit Requirement (Days)	Cost to Implement Year One	Cost to Implement Year Two	Cost to Implement Entire Permit
Conduct one public meeting (residential)	2	\$2,240	\$0	\$2,240
Conduct one public meeting (business)	0.5	\$560	\$0	\$560
Conduct one public meeting (industrial)	0.5	\$560	\$0	\$560
Conduct one public meeting (developers)	1	\$1,120	\$0	\$1,120
Minimum Control 2 Sub Total:	4	\$4,479	\$0	\$4,479
Minimum Control Measure 3: Stormwater Illicit Discharge Detection and Elimination (IDDE)				
	New Permit Requirement (Days)	Cost to Implement Year One	Cost to Implement Year Two	Cost to Implement Entire Permit
Field locate, inspect and sample (assume 20% have flow) 150 outfalls, dry weather, 20 outfalls/day	7.5	\$6,300	\$6,300	\$31,500
Field locate, inspect and sample 150 outfalls, wet weather, 10 outfalls/day	15	\$12,600	\$12,600	\$63,000

Lab analysis/field kits 20% dry weather outfalls, 100% wet weather outfalls		\$14,200	\$14,200	\$71,000
Investigate positive (20% positive) sample results for 150 outfalls sampled 3 staff days to investigate with two staff members	180	\$151,200	\$151,200	\$756,000
Preparation of a report summarizing IDDE program, including dry and wet weather screening.	10	\$9,600	\$9,600	\$48,000
Develop a map of the separate storm sewer system and all structures associated with the system per 2.4.4.6 (a). The map shall include the entire separate storm sewer system, including pipes, catch basins, interconnections to other small MS4s	35	\$60,000	\$0	\$60,000
Establish a written protocol which clearly identifies responsibilities with regard to eliminating illicit discharges and the systematic procedure for locating and removing illicit connections.	5	\$4,200		\$4,200
Delineate catchments and complete illicit discharge potential assessment and prioritization of catchments as part of IDDE program	17	\$14,280		\$14,280
Remove all illicit discharges found in each identified problem catchment.	10	\$20,000	\$20,000	\$100,000
Train employees about the IDDE Program including how to recognize discharges and SSOs	2	\$1,920	\$1,920	\$9,600
<u>Minimum Control 3 Sub Total:</u>	<u>282</u>	<u>\$294,300</u>	<u>\$215,820</u>	<u>\$1,157,580</u>
Minimum Control Measure 4: Construction Site Runoff Control	New Permit Requirement (Days)	Cost to Implement Year One	Cost to Implement Year Two	Cost to Implement Entire Permit
Enact an ordinance or regulatory mechanism that requires use of sediment and erosion control practices at construction sites	-	-		
Develop procedures for site plan review and enforcement, site plan review	5	\$5,599		\$5,599
<u>Minimum Control 4 Sub Total:</u>	<u>5</u>	<u>\$5,599</u>	<u>\$0</u>	<u>\$5,599</u>

Minimum Control Measure 5: Post-Construction Stormwater Management in New Development and Redevelopment	New Permit Requirement (Days)	Cost to Implement Year One	Cost to Implement Year Two	Cost to Implement Entire Permit
Enact an ordinance or regulatory mechanism that regulates runoff from new development and redevelopment projects.		-		
Develop a report assessing current street design and parking lot guidelines and requirements that affect the creation of impervious cover	7.5	\$7,200		\$7,200
Develop a report assessing existing local regulations to determine the feasibility of making green infrastructure practices allowable	8	\$7,680		\$7,680
Estimate number of acres of impervious area (IA) and directly connected impervious area (DCIA) ; Report tabulated results and estimation methodology if baselines provided by EPA are not used.	5	\$4,200	\$4,200	\$21,000
Estimate the number of acres of DCIA added or removed to each sub basin during the prior year	4	\$3,360	\$3,360	\$16,800
Complete an inventory and priority ranking of MS4 owned property and infrastructure that may be retrofitted with BMPs designed to reduce the frequency, volume, and peak intensity of stormwater discharges to and from its MS4.	5	\$4,800		\$4,800
Minimum Control 5 Sub Total:	30	\$27,240	\$7,560	\$57,480
Minimum Control Measure 6: Pollution Prevention/Good Housekeeping for Municipal Operations	New Permit Requirement (Days)	Cost to Implement Year One	Cost to Implement Year Two	Cost to Implement Entire Permit
Develop written operations and maintenance procedures for the municipal activities listed in paragraphs of 2.4.7.1 (a-c). a. Parks and open space: b. Building and facilities: c. Vehicles and equipment	15	\$12,600		\$12,600

a. Parks and open space: Establish procedures to address the proper use, storage, and disposal of pesticides, herbicides, and fertilizers including minimizing the use of these products and using only in accordance manufacturer’s instruction. Evaluate 1		\$0		\$0
b. Buildings and facilities: This includes schools, town offices, police, and fire stations, pools, parking garages and other permittee-owned or operated buildings or utilities. Evaluate the use, storage, and disposal of both petroleum and non-petroleum		\$0		\$0
c. Vehicles and Equipment: Establish procedures for the storage of permittee-owned vehicles. Vehicles with fluid leaks shall be stored indoors or in contained areas until repaired. Evaluate fueling areas owned by the permittee and used by permittee-own		\$0		\$0
Clean and inspect approximately 10,000 catch basins, assuming inspect and/or clean twice during the 5-yr. permit cycle.		\$557,000	\$557,000	\$2,785,000
Establish procedures for sweeping and/or cleaning streets, sidewalks, and permittee-owned parking lots. These areas shall be swept and/or cleaned a minimum of twice per year.		\$240,000	\$240,000	\$1,200,000
Develop an inventory of all permittee owned facilities within the categories listed per 2.4.7.1 (a-d) and other facilities not in the categories listed, but owned and operated by the permittee.	5	\$2,599		\$2,599
Develop an inventory of all floor drains within all permittee owned buildings Schools, DPW, etc.	5	\$50,000		\$2,599
Minimum Control Measure 6: Pollution Prevention/Good Housekeeping for Municipal Operations	New Permit Requirement (Days)	Cost to Implement Year One	Cost to Implement Year Two	Cost to Implement Entire Permit
If a catch basin sump is more than 50 percent full during two consecutive routine cleaning events, describe any actions taken to investigate the contributing drainage area for sources of excessive sediment loading, and to the extent practicable, abate con	8	\$6,720		\$6,720

Document plan for optimizing catch basin cleaning, which includes metrics and other information used to reach the determination that the established plan for cleaning and maintenance is optimal for the MS4.	5	\$4,200		\$4,200
Establish within 6 months of the effective date of the permit a program to repair and rehabilitate its MS4 infrastructure in a timely manner to reduce or eliminate the discharge of pollutants from the MS4.	5	\$4,800		\$4,800
Establish inspection and maintenance frequencies and procedures for the storm drain systems and for all structural stormwater BMPs such as swales; retention/detention basins or other structures. All permittee-owned stormwater structures shall be inspected	20	\$19,200	\$9,000	\$55,200
Develop, implement, and sign a written SWPPP for maintenance garages, public works facilities, transfer stations, and other waste handling facilities. SWPPP to include all requirements identified in 2.4.7.2 (b)	15	\$14,400		\$14,400
Conduct SWPPP quarterly inspections	10	\$9,600		\$9,600
<u>Minimum Control 6 Sub Total:</u>	<u>88</u>	<u>\$921,1</u>	<u>\$806,000</u>	<u>\$4,097,718</u>
Annual Reporting	New Permit Requirement (Days)	Cost to Implement Year One	Cost to Implement Year Two	Cost to Implement Entire Permit
Self assessment on permit terms and conditions and appropriateness of BMPS	0.5	\$420	\$420	\$2,100
For increased discharges identify those additional BMPs that the permittee has or will implement to assure that the increased discharge is not causing or contributing to a water quality standards violation.	0.5	\$420	\$420	\$2,100

For the public education program report on the messages for each audience; the method for distribution; the measures/methods used to assess the effectiveness of the messages, and the method/measures used to assess the overall effectiveness of the education	0.5	\$420	\$420	\$2,100
For public participation report on the activities undertaken to provide public participation opportunities including compliance with Part 2.4.3.1.	0.5	\$420	\$420	\$2,100
Include inventory of all Problem Catchments and track removal illicit discharges	4	\$3,360	\$3,360	\$16,800
Track progress of IDDE program, including mapping, SSO's, outfall inventory progress, illicit discharge removal in annual reports.	5	\$4,200	\$4,200	\$21,000
Document the number of site reviews, inspections, and enforcement actions in the SWMP and include in each annual report.	1	\$840	\$840	\$4,200
Report on (a) status of assessment of current street design and parking lot guidelines, (b) progress towards allowing green infrastructure, (c) those MS4 owned properties and infrastructure that have been retrofitted with BMPs designed to reduce the freq.	1	\$840	\$840	\$4,200
Annual Reporting	New Permit Requirement (Days)	Cost to Implement Year One	Cost to Implement Year Two	Cost to Implement Entire Permit
Report on actions taken for catch basin sumps that are more than 50 percent full during two consecutive routine inspections. Report on plan for optimizing catch basin cleaning. Report the number of catch basins inspected, number cleaned, and the volume o	2	\$1,680	\$1,680	\$8,400
Report the number of miles of streets swept/cleaned and the volume or mass of material removed.	0.5	\$420	\$420	\$2,100

Report on the status of the inventory and any subsequent updates; The status of the O&M programs for the permittee owned facilities and activities in Parts 2.4.7.1(a – d) ; In addition, the maintenance activities associated with each.	1	\$840	\$840	\$4,200
Report on results of inspections conducted under the Stormwater Pollution Prevention Plan (SWPPP)	0.5	\$420	\$420	\$2,100
Description of activities for next reporting cycle and changes in identified BMPS or measurable goals.	0.5	\$420	\$420	\$2,100
<u>Sub Total for Annual Reporting:</u>	<u>18</u>	<u>\$14,700</u>	<u>\$14,700</u>	<u>\$73,500</u>
Total	454	\$1,29,358	\$1,046,240	\$5,430,917